JOHNNY CHUNG: HIS UNUSUAL ACCESS TO THE WHITE HOUSE, HIS POLITICAL DONATIONS, AND RELATED MATTERS

HEARINGS

BEFORE THE

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT HOUSE OF REPRESENTATIVES

ONE HUNDRED FIFTH CONGRESS

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JOHNNY CHUNG: HIS UNUSUAL ACCESS TO THE WHITE HOUSE, HIS POLITICAL DONATIONS, AND RELATED MATTERS

THURSDAY, NOVEMBER 13, 1997

HOUSE OF REPRESENTATIVES,
COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
Washington, DC.

The committee met, pursuant to notice, at 10:15 a.m., in room 2154, Rayburn House Office Building, Hon. Dan Burton (chairman of the committee) presiding.

Present: Representatives Burton, Morella, Cox, Ros-Lehtinen, McHugh, Horn, Mica, Davis of Virginia, McIntosh, Souder, Shadegg, Sununu, Pappas, Snowbarger, Barr, Portman, Waxman, Lantos, Kanjorski, Sanders, Maloney, Barrett, Norton, Fattah, Cummings, Kucinich, Davis of Illinois, Tierney, Allen, and Ford.

Staff present: Kevin Binger, staff director; Richard Bennett, chief counsel; Dudly Hodgson, chief investigator; Barbara Comstock, chief investigative counsel; Judith McCoy, chief clerk; William Moschella, deputy counsel and parliamentarian; Teresa Austin, assistant clerk/calendar clerk; Will Dwyer, director of communications; Ashley Williams, deputy director of communications; Dave Bossie, oversight coordinator; Robert Rohrbaugh, James C. Wilson, and Uttam Dhillon, senior investigative counsels; Charli Coon, Kristi Remington, Bill Hanka, and Jennifer Safavian, investigative counsels; Phil Larsen, investigative consultant; Jim Schumann, investigator; Robin Butler, office manager; Carolyn Pritts, David Jones, and John Mastranadi, investigative staff assistants; Phil Schiliro, minority staff director; Phil Barnett, minority chief counsel; Kenneth Ballen, minority chief investigative counsel; Agnieszka Fryszman, Kristin Amerling, Christopher Lu, Andrew McLaughlin, Michael Raphael, Michael Yang, and Michael Yeager, minority counsels; Harry Gossett, minority professional staff member; Ellen Rayner, minority chief clerk; Jean Gosa and Andrew Su, minority staff assistants; and Sheridan Pauker, minority research assistant.

Mr. BURTON. Good morning, a quorum being present, the Committee on Government Reform and Oversight will come to order.

Before Mr. Waxman and I begin our opening statements, we will dispose of some procedural matters. First of all, I ask unanimous consent that all Members' statements be included in the record.

And without objection, so ordered.

[The prepared statement of Hon. Danny K. Davis follows:]

Danny K. Davis

STATEMENT OF DANNY K. DAVIS (IL)
"Campaign Finance Reform Investigation"

Mr. Chairman, we assemble here today to continue the investigation of campaign finance abuses from the 1996 election cycle. Today we examine Johnny Chung and his unusual access to the White House, his political donations and related matters.

While I am encouraged that this hearing is taking place, I can not help but remain somewhat pessimistic because as I reviewed the depositions of the witnesses before us they shed no further light on the issue of foreign influence in our political process. In particular, one of the witnesses before us Ms. Maggie Williams has had to spend over $250,000 in legal fees throughout this investigation and expend money to come from France to appear before this Committee. I suppose what is most concerning is that Ms. Williams was questioned for over 10 hours without a lunch break.

The real issue before us today is not conduit payments to the Democratic National Committee, rather when will we begin to have serious debate on reforming the campaign finance laws. We must seize the moment and provide real reform if the people are to believe that we are serious.

It is no secret that the current system of campaign finance laws are severely flawed. These laws threaten the very essence of our democracy. It is imperative that we reform the current system and send a message that this government is not for sale. We must eradicate the notions that money can buy justice, elections and anything else you want in America. The current system has too much money in it. It is tantamount to capitalism run-amuck. This is capitalism at its very worst. This is the vultureness of capitalism which undermines the very essence and ideals of democracy. We must send the message that no part of our government system can be bought or purchased.

Campaign finance reform is one of the critical issues of the day. The stakes are too high for us to dally around and do nothing about campaign finance reform. There have been over 70 bills introduced in this Congress alone regarding campaign finance reform and the leadership has yet to schedule debate on any of them.

This Committee has spent over $3 million on this investigation and held only three hearings to date. The hearings have revealed no new information that was not already uncovered by the Senate investigation. Unfortunately, we continue to waste valuable taxpayer dollars by holding hearings just for the sake to hold hearings.

History has thrust on our generation an indescribably important destiny—to complete a process of campaign finance reform—to make democracy real in the lives of each and every American. This is our opportunity to make the magnificent words of the constitution and declaration of independence ring true—that this is in fact a government "by and for the people"----not by and for the rich and wealthy, but by and for all the people irrespective income, gender, or color.

I urge that we get serious about campaign finance reform and begin to look at legislative initiatives that seek to close campaign finance loopholes. Again, thank you for this opportunity Mr. Chairman.

Thank you.

Mr. BURTON. I ask unanimous consent that all exhibits, articles, and extraneous or tabular material referred to during this hearing be included in the record.

Without objection, so ordered.

I ask unanimous consent that the depositions of Maggie Williams, Evan Ryan, and Gina Ratliffe be made a part of the record.

Without objection, so ordered.

I ask unanimous consent that Members be able to use the depositions of Carol Khare and Kelly Crawford in open session.

Without objection——

Mr. WAXMAN. Reserving the right to object, and I will not object, but I do want to indicate that it is our desire that those three depositions be made public.

We are withholding a unanimous consent request while our lawyers look at those depositions to see if there is any reason that they ought not to be made public. I just want to point that out. We will hopefully come back to this issue later. I withdraw my reservation to the unanimous consent request.

Mr. BURTON. Without objection, so ordered.

In concurrence with the minority, I ask unanimous consent that the Members be able to use the depositions of Ari Swiller, Dick Morris and Eric Sildon in open session.

Without objection, so ordered.

I ask unanimous consent that the depositions of Carol Khare and Kelly Crawford be made a part of the record once they have had the opportunity to review their deposition pursuant to committee rule No. 20.

Without objection, so ordered.

Questioning in the matter under consideration shall proceed under clause 2(j)(2) of House rule 11, and committee rule 14, in which the chairman and ranking minority member allocate time to committee counsel as they deem appropriate for extended questioning, not to exceed 60 minutes per panel, equally divided between the majority and minority.

Today, we are going to begin 2 days of hearings regarding Johnny Chung, his political donations, and his unusual access to the President of the United States.

Today's hearing will focus on his controversial $50,000 contribution to the Democratic National Committee in March 1995, the role of the First Lady's office, his success in gaining access to the President for Chinese associates, and his involvement in the Harry Wu affair.

Mr. Chung has been subpoenaed to appear before this committee. As everyone knows, he has invoked his fifth amendment right against self-incrimination. We are continuing to have discussions with his attorney, who has asked that Mr. Chung testify in executive session. At this point, it is our plan to conduct a deposition with Mr. Chung tomorrow morning before making a final determination on that matter.

These are our first hearings on Johnny Chung. They will not be our last. We will not try to answer all of the questions that have been raised about him in just 2 days. This is an area that we will return to in the coming months.

Johnny Chung contributed $366,000 to the Democratic National Committee. All of that money has been returned because of suspicions about its legality.

While all the answers are not in yet, these suspicions appear to be well-founded. In addition to his donations to the DNC, this committee has obtained clear-cut evidence that employees of Johnny Chung arranged conduit contributions to the Clinton/Gore campaign. Committee staff has interviewed three individuals in California, who contributed $1,000 each to the Clinton/Gore campaign and were reimbursed in cash by an employee of Johnny Chung.

This hearing is not, however, just about Johnny Chung. This hearing is about a White House that attracted him like a magnet. This is a story about a President who was starved for cash and did not mind going all out to get it.

Johnny Chung wanted to use the White House, and this is a White House that was willing to be used.

In a Los Angeles Times article this summer, Johnny Chung said, quote, "I see the White House is like a subway, you have to put in coins to open the gates."

Where did he get this impression? It is not hard to figure out. This is the same White House where hundreds and hundreds of major donors, complete strangers, were invited to sleep over in the Lincoln bedroom at the President's directive. This was the same White House where over 100 fund-raising coffees were held by the President. This was the same White House where convicted stock swindlers and drug traffickers found their way into intimate gatherings with the President. This was the same White House where John Huang and Charlie Trie were roaming the hallways with controversial figures like James Riady of Indonesia and Ng Lap Seng of Macau.

Time after time, we are seeing that the President and his people were more than happy to be used, as long as the money kept flowing in.

Johnny Chung was described by one National Security Council aide as a, quote, "hustler." More and more this description appears to fit. To Johnny Chung, the White House and the President were promotional tools for his business ventures.

His promotional booklet for his fax business features no less than 12 photos of the President and the First Lady. There are another dozen photos of Mr. Chung in various rooms at the White House. He was aggressively using this booklet to recruit new investors for his company. One California investor was so impressed with Mr. Chung and his connections with the President that he and his family invested over $900,000 in Johnny Chung's company. Within months, he realized he had made a mistake and sued to get his money back.

Johnny Chung was also working very hard to develop business ties in China. When the Los Angeles Times asked him about his efforts to get Chinese officials in to see the President of the United States, he said, "I am trying to build a new business in China, so I am happy to do my best to help."

In March 1995, Johnny Chung wanted to get six well-placed Chinese nationals into the White House to see the President. He went

to see Richard Sullivan at the DNC. He offered to make a substantial contribution if he could get them in and arrange this meeting.

Mr. Sullivan would not set up the meeting. In his Senate deposition, Mr. Sullivan said, "Johnny Chung had made me nervous. Him showing up with these five people from China . . . I had a sense that he might be taking money from them and then giving it to us, you know. That was my concern."

Mr. Chung was not deterred. He went to the First Lady's office at the White House. Mr. Chung has said in news interviews that the First Lady's Chief of Staff was willing to help him, but that she solicited a large contribution from him to help pay off the DNC's debts to the White House. Mr. Chung said that he readily agreed to donate $50,000. This charge is denied by Mrs. Clinton's Chief of Staff, Margaret Williams. We will hear testimony from her today.

Mr. Chung has also stated that he was told that the First Lady was aware of his contribution. I will ask the staff at this point to play that portion of his interview that Mr. Tom Brokaw had with him.

Would you put that on right now, please? I hope the sound system is working.

[Video tape presentation was shown.]

Mr. BURTON. One by one, Mr. Chung's requests were quickly agreed to. It apparently took a flurry of phone calls between the White House and the DNC before the final and most important request was filled: admission to the President's Saturday morning radio address. After interviewing and deposing several people over the last 2 weeks, we still do not know who gave the final approval for this request. We will ask several of our witnesses today who gave the final approval. We need to know that. However, it appears that this may remain an even greater mystery than who hired Craig Livingstone.

There are three important questions that we would like to try to answer on this issue: First, did the White House staff solicit campaign contributions in exchange for official favors? Second, why wasn't anyone asked to screen foreign nationals being brought into the President, as was done in previous administrations? Third, was Mr. Chung's donation itself legal?

We have 2 days to try to resolve these three questions. We will see how far we get.

I think that it is interesting to note that Richard Sullivan, the finance director of the Democrat National Committee, would not set up a meeting with the President, because he was concerned that Mr. Chung's contributions may have come from a foreign source. I will repeat his words once again: "I had a sense that he might be taking money from them, (his Chinese associates), and giving it to us."

However, when Mr. Chung's $50,000 check came in, it was readily accepted, no questions asked. In fact, Mr. Chung contributed a total of $190,000 after that date.

Were Mr. Sullivan's concerns justified? The facts aren't all in yet. Mr. Chung's finances are difficult to unravel. However, here is what we do know about the $50,000 donation.

On March 6, Johnny Chung received a $150,000 wire transfer. The money came from the Haomen Tangshan Beer Co. in Beijing.

Mr. Chung escorted the chairman of this company to see President Clinton in December 1994. At the time, there was less than $20,000 in Mr. Chung's account.

On March 9, the day of his meeting with Mrs. Clinton, Mr. Chung wrote a check to the DNC for $50,000.

What do these transactions mean? We honestly don't know. Was this a conduit contribution? Was this $150,000 legitimate income earned by Mr. Chung's business? We don't have the answers yet. We hope to ask Mr. Chung these questions tomorrow.

If nothing else about the way the White House dealt with Johnny Chung generates any outrage, the case of Harry Wu should. On June 19, 1995, human rights activist Harry Wu was arrested in China. He was trying to expose slave labor conditions there. This set off a lengthy and very delicate area of negotiations to win his release.

When Johnny Chung met the President in a receiving line at a fund-raiser, he informed the President that he was going to go to China and try to get Harry Wu released. According to Johnny Chung's account, the President urged him to go on.

Mr. Chung sent a fax to both the White House and the DNC stating that he needed a letter of credentials so that the Chinese Government would know that he was there on the President's behalf. He told the DNC that he was going to meet with the President of China.

This should have set off alarm bells. He should have immediately received a call from the White House. He should have been told that this was an extremely sensitive situation and that it had to be handled by professional diplomats. Instead, he apparently got no response from the White House.

What he did get was a letter of credentials and encouragement from the head of the Democrat National Committee, Mr. Fowler. The chairman of the DNC was perfectly prepared to allow one of his major contributors to go blundering into a very delicate situation with God knows what consequences.

At the same time Mr. Fowler's letter was being prepared, another DNC official, Bobby Watson, was calling the White House to warn them that Mr. Chung was on his way to China, and that he intended to represent to the Chinese Government that he was speaking for the President of the United States. In other words, they knew that they shouldn't have been doing what they were doing, but they did it anyway, and then they tried to contain the damage.

By the time the National Security Council found out about this, Mr. Chung was already on his way to China. It was too late.

Far East expert Robert Suettinger stated in a memo to Anthony Lake: "All we can do is hope the Chinese recognize Chung's credentials are thin, and that his message should be treated with caution. No one in the administration has any idea of what he plans to say on the subject of Harry Wu.

"In the Harry Wu case, however, he could conceivably do damage, depending on what he says and how much credibility he carries with Beijing."

Mr. Suettinger's comments pretty much say it all. He will be testifying tomorrow.

Was the Clinton White House that desperate to humor Johnny Chung and keep the money flowing? A man's life and freedom were hanging in the balance. Would no one call Johnny Chung and stop him from forging ahead into this explosive situation?

We have two panels of witnesses over the next 2 days. We have serious issues to deal with. We have a lot of ground to cover. As I said earlier, we are not going to try to answer all of the questions about Johnny Chung and the White House over the next 2 days. However, I hope that we will make a dent.

I look forward to hearing the testimony of Ms. Williams and other witnesses today, and I now recognize Mr. Waxman for this opening statement.

Mr. WAXMAN. Thank you, Mr. Chairman.

This is not a hearing about economic espionage or foreign agents or conspiracies to infiltrate our political system or any of the more sensational charges that we heard about earlier this year. This is a hearing about campaign contributions and access, and that is an important topic, especially if we have any genuine interest in reforming our campaign finance system.

I think Robert Suettinger will testify tomorrow, providing the best description of Johnny Chung in a 1995 memo. That memo appeared in the New York Times on February 15th, warned that Mr. Chung should be treated with a pinch of suspicion. Mr. Suettinger wrote, "My impression is is that he's a hustler and appears to be involved in setting up some kind of consulting operation."

I think that is right. Nothing in the materials that the committee has received indicates anything else. Johnny Chung was acting in his self-interest to make money. And in doing so, he did what thousands of other people do in Washington every year. He set out to gain access.

Now, one of the reasons the public ridicules politicians is that in these instances we invariably have selective outrage. When Republicans buy or sell access, Democrats howl. When Democrats buy or sell access, we have Republican outrage.

We specialize in self-righteousness and ignore the overwhelming reality, and that reality is that money buys access. To pretend otherwise is ridiculous.

I have a page from the Senate Republican Campaign committee's 1996 manual. It provides advice on fund-raising to Republican candidates, and has a section entitled: "Why do people give money?" It lists three reasons. One, they know you and like you; two, they believe in similar issues, (usually small donors); three, to gain access to power.

So there is no misunderstanding, I am not suggesting that only Republicans think this way. There is probably nearly identical advice given to the Democrats in our campaign finance manuals. Johnny Chung and thousands others fall into category No. 3. They are in the business of politics and money brings enhanced access.

I am amazed that anyone would be surprised by this. If Jane Smith, just a regular constituent, called any member of this committee and asked for a meeting, the answer would probably be no. That is a reality of politics. We have too many requests and we can't meet with everyone. But if Jane Smith and her husband had given $2,000 each and then called our staffs, the chances are pretty

good that there would be a meeting. And that is a cold reality of politics today.

It may, and I hope it does, bother us. We should find it repugnant and we should come clean to the American people and admit what they already know is true. In the scheme of things, Johnny Chung was not a big player by Washington standards. He is dwarfed by the money and access that tobacco companies and others like Archer Daniels Midland or Amway enjoy. Nonetheless, the record shows Mr. Chung gave hundreds of thousands of dollars and then visited the White House over 50 times. He ate in the Mess, attended a radio address, sat in the movie theater, attended parties, and schmoozed. The only thing it seems he didn't do is ask for any policy favors.

It could be that the White House extends these privileges to every American that asks. I am skeptical and find it impossible to believe that Mr. Chung would have had the same opportunities had he not given campaign contributions.

Another reality of politics is that this didn't start with Johnny Chung. I have an article from May 1, 1992, by Lars-Erik Nelson, and that should be of great interest to this committee. It was given to me by my Uncle Ben, who was looking through some of his papers, and I want to read parts of this article. The headline says:

President Bush and his campaign team recognize dollars, ignore donors. Who is that distinguished gentleman sitting at the head table with Michael Kojima? Why, yes, it's President Bush. And there's Barbara, too. Aren't they lucky to be rubbing shoulders with Michael Kojima at this gala President's dinner?

A better question, of course, is who is Michael Kojima to be seated with the President? And the answer to that is, nobody has a clue. Kojima simply donated $400,000 to a Republican fund-raiser and was made an honored guest.

He is described as a Los Angeles businessman, but his office address is a front, rented space in a law firm where he never shows up. His voting address is also a fake; it's his wife's business address.

He shows up in no newspaper clippings. The California secretary of state has no listing for his business. California politicians, both Democrat and Republican, have never heard of him.

The organizers of the President's dinner, which raised $9 million for Republican congressional candidates, admit they are mystified about Kojima. This is the first time he has appeared as a heavy-hitting contributor, and, as GOP spokesman Rich Galen explained, you don't cross-examine a guy who writes checks with so many zeros after the dollar sign.

Lots of things stink in your Nation's capital, but this President's dinner absolutely reeks.

One of the cochairmen, James Elliot, is a convicted felon, in connection with an S&L racket, who was lobbying for a Presidential pardon. He figured selling tickets to the President's dinner might help his cause. Surely, it would. If he could sell $92,000 worth of tickets, he gets to be photographed with the President.

There is worse, however. According to a suit filed in Illinois, Elliot leaned on employees of his company, Cherry Payment Systems, to buy $1,500-per-plate tickets to the President's dinner if they knew what was good for them. William Neiss, an employee who refused, said he was fired as a result.

President Bush, of course, is horrified that anyone would lean on people to support the Republican Party. Bush has been in politics for 28 years, but he is like unto a newborn babe when it comes to the subject of campaign contributions.

Also, he has nothing, in principle, against selling access to himself. Spokesman Marlin Fitzwater explained: "It's buying access in the system, yes," he said. "That's what the political parties and the political operation is all about."

Now, you and I were not born yesterday. Certainly it is a long-established practice that the extremely wealthy can buy their way into the system, buy invitations to state dinners in the White House, buy photo opportunities with the President, buy a lunch with Vice President Quayle, ($20,000), or even buy Ambassadorships, ($100,000).

Generally, however, the politicians who peddle this access know who is buying it. In the case of Kojima, they have no idea. They don't know who he is or what he does or where his money comes from. He called himself an international business consultant, but what could that mean? The Bank of Credit and Commerce International was an international business. Manuel Noriega was in international business.

The Secret Service checked only to make sure he posed no physical threat to the President. As for embarrassing Bush, the Secret Service couldn't care less. "We don't veto his guest list," a spokesman said. Oddly, the Republicans don't care who Kojima is, either. They just look at the check, cash it, and ask him where he wants to sit.

After 2 days of searching all available records for Michael Kojima, all I can tell you about him is this: Whoever he is, whatever he does, and whatever he wants out of life, he has more access to President Bush than you ever will.

Well, there it is. Before we had a Clinton administration, or any of us had ever heard of Johnny Chung, we had money, access, international consultants, coercion to contribute, and a willingness to accept money with no questions asked. As Yogi Berra once said, it is déjà vu all over again.

Was it wrong that Michael Kojima could work the system so that he could sit by President Bush's side? Absolutely. Should we be disgusted? Absolutely. Was it wrong that Johnny Chung could work the system so that he could be at President Clinton's side? Absolutely. Should we be disgusted? Absolutely.

Mr. Chairman, I know that on many occasions you have said that it is not the system that is broken. I think you are dead wrong. The system is a farce. Johnny Chung is an equal opportunity opportunist. And I want, if we could, to show a couple of photos of him.

We know about him with President Clinton. But he was also able to get photographs and access to the Speaker of the House, Newt Gingrich. The majority leader, Senator Bob Dole.

Mr. Chairman, I know you oppose reforms that fundamentally change how we finance campaigns and I think you are wrong again. The only legitimate purpose our hearings can serve is to change the system. If we had public financing, I believe we would have a whole lot less of Michael Kojimas and Johnny Chungs to worry about.

One last point. Our first witness today is Maggie Williams and she is here voluntarily. She has already been deposed in the Senate for 8 hours, and in the House for over 10 hours.

She now lives in Paris and made a special trip to be here today. She worked for the Clinton administration for 4 years. No one has produced any evidence that she ever acted illegally or unethically, notwithstanding that she has already incurred over a quarter of a million dollars in legal fees. I think in most cases people don't go into public service for the money. But this is ridiculous.

Ms. Williams, having reviewed your depositions, I think the Senate made the right choice by not calling you as a witness. I am not sure why you are here, but I want to thank you for coming here today and tell you that I look forward to your testimony.

Mr. Chairman, I yield back the balance of my time.

Mr. BURTON. Thank you, Mr. Waxman.

Ms. Williams, would you rise so that you can be sworn, please?

[Witness sworn.]

Mr. BURTON. Be seated.

Ms. Williams, on behalf of this committee, we welcome you here today. You are recognized for 5 minutes, if you wish to make an opening statement. If it is longer than that, we will include your entire statement in the record.

STATEMENT OF MARGARET A. WILLIAMS, ACCOMPANIED BY ED DENNIS, ESQ.

Ms. WILLIAMS. Thank you. Good morning, Mr. Chairman, Mr. Waxman, members of the committee. You have asked me to come here today to address you concerning Johnny Chung.

I will tell you what I know of this matter. There are many things that I do not know and will be unable to assist you with, but those things that I know about, I am more than happy to answer your questions this morning.

I do not remember the exact circumstances of my first introduction to Johnny Chung. I know I met him early in the first term of the Clinton administration. I do remember the story he told me at our first meeting. He told me that Mrs. Clinton's encouragement was important to the success of his business. He credited her with his professional achievements and told me she remained a significant inspiration in his life.

His enthusiasm for Mrs. Clinton, I will tell you, bordered on the worshipful. Mr. Chung would not and seemingly could not stop saying how much he admired her. He was highly emotional about his support for her, and I did not doubt his sincerity. This initial interaction with Mr. Chung became the context for my association with him. At some point, I also learned that he was a contributor to the Democratic National Committee.

As has been reported in the media and recorded in the visitor entry records, Johnny Chung came to the buildings in the White House complex a number of times. Many of those entries were arranged by my assistant, Evan Ryan. Long before Mr. Chung requested that he be cleared through my office for entry into the White House complex, he routinely would be in the Old Executive Office Building and stop by my office which housed the First Lady's staff. Our staff office, unlike most of the offices in the Old Executive Office Building, kept the reception door open. The open door, a rotating picture gallery featuring the First Lady busy with her many activities, stacks of reprinted speeches available for the taking, and a huge cardboard cutout of the First Lady, a favorite site for visitor photos, encouraged unscheduled drop-bys from interns, visitors with other business in the Old Executive Office Building, family members, and friends. The reception area was a welcoming place and we made it that way on purpose.

Mr. Chung visited the First Lady's office in the Old Executive Office Building more often than most. Like other visitors to our reception area, he typically would spend time viewing the pictures, using the phone reserved for guests, chatting with anyone and everyone working or passing through the front of our office. His many visits and then his constant requests later to be cleared into the complex did provoke complaints from both my volunteers and my staff. They found his visits to be a nuisance. They found his personal manner irritating. Indeed, there were times when I walked through

other offices to avoid running into Mr. Chung when I was especially busy.

Nevertheless, the standard of treatment I demanded for Johnny Chung was the same standard of treatment I demanded for all of our visitors and supporters who came into the Old Executive Office Building. I continued to require that the First Lady's staff, whether they wanted to or not, extend every courtesy to him. And I instructed my staff to be tolerant of both his visits as well as his requests.

Now, to be honest, any special treatment given to Mr. Chung represented my efforts to compensate to some degree for the snickers that sometimes occurred during his inartful and sometimes confounding use of the English language. He could be embarrassingly aggressive. He was like a bull in a China shop is, but he was never unkind. He was never rude. He was different, it was clear. It was clear to me; it was clear to my staff that he was different. He was different socially and culturally, and it showed. Sometimes painfully so. And as an African American, I can tell you, I know what it means to be different in politics in America, and be on the outside of things and struggle mightily for insider status and recognition. And so I, perhaps, had an especially high tolerance for Mr. Chung.

A prime example of his aggressive and I believe sometimes simply misguided behavior was his persistent requests to give money directly to Mrs. Clinton. He wanted to demonstrate his financial support for her. On more than one occasion I told Mr. Chung this was not possible, although his offer was much appreciated.

In response to his requests, I told him he could support Mrs. Clinton by supporting the DNC. So when he asked me how can I give, how can I show support, I told him support the DNC or perhaps give to the Clinton/Gore campaign. Write Mrs. Clinton a note and tell her how much you appreciate the work she is doing for our country. Help the President and Mrs. Clinton's legal defense fund. These were my standard responses to anyone asking me how they could help or show their support for the Clintons.

I do not remember if I ever responded to Mr. Chung's requests to give money to Mrs. Clinton by directing him to the President and First Lady's legal defense fund, although it is likely that I did. I do know that when Lynn Cutler, one of the founders of the Back-to-Business Committee, asked if I knew Clinton supporters who would be spokespersons or contributors to the group, Mr. Chung's name was one of the four or five people I recommended that she talk to.

One day Mr. Chung came to the Old Executive Office Building. I believe that either in the reception area of my office in the Old Executive Office Building or in the hallway leading into the reception area, Mr. Chung pressed me to take a check for the DNC. He was both excited and insistent, saying words to the effect, "I give to the DNC through you; I give through the First Lady's office."

Now, I did not encourage Mr. Chung to believe that presenting me or someone in my office with a campaign contribution or a DNC contribution would result in any credit with me or my office, nor did I encourage him to believe that our office was a conduit for campaign contributions of any kind.

And now, in retrospect, after having had depositions of nearly 15 hours about this matter, after coming here and leaving my new husband in Paris, France, in retrospect, I could have been equally insistent, I suppose, that I could have been rude and refused to take the check from him. But it made no sense to me at that time to do anything than take the check, quiet him, shorten our encounter, remain gracious, and get on with what I had to do.

I believe I put the check in my outbox leaving an assistant or volunteer to direct it to its appropriate destination, as I had done with other checks that my office had received through the mail.

Entry records to the White House complex suggest that Mr. Chung had a picture taken with Mrs. Clinton on the same day he gave me that check to pass along to the DNC. I did arrange for Mr. Chung to use my personal account at the White House lunchroom. Possibly more than one time—my personal account, the account that I pay for with my own money.

Both arrangements were the type I had made for others, including Members of Congress, members and friends of the administration, staff, visitors, and family, on numerous occasions. I needed no special motivation to do for Mr. Chung what I had done for others.

[The prepared statement of Ms. Williams follows:]

STATEMENT OF MARGARET WILLIAMS
BEFORE THE UNITED STATES HOUSE OF REPRESENTATIVES
COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT
WASHINGTON, D.C.
NOVEMBER 13, 1997

Mr. Chairman, Members of the Committee, you have asked me to address this Committee concerning Johnny Chung.

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Mr. Chung visited the First Lady's Office in the Old Executive Office Building more often than most. Like other visitors to our reception area, he typically would spend time viewing the picture gallery, using the phone reserved for guests and chatting with anyone working or passing through the front office of the suite. His many visits and then his constant requests to be cleared into the complex provoked complaints from volunteers and staff who were seated in the reception area. It was not a secret that many on my staff found his visits to be a nuisance and his personal manner irritating. Indeed, there were times when I walked through other offices to avoid running into Mr. Chung when I was especially busy. Nevertheless, the standard of treatment I demanded for Johnny Chung was the same standard of treatment I demanded for all of our visitors and supporters. I continued to require that the First Lady's staff extend every courtesy to him, and I instructed my staff to be tolerant of both his visits and his requests.

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A prime example of his aggressive and I believe sometimes simply misguided behavior was his persistent requests to give money directly to Mrs. Clinton. He wanted to demonstrate his financial support for her. On more than one occasion, I told Mr. Chung this was not possible, although his offer was much appreciated. In response to his requests I told him he could support Mrs. Clinton by supporting the DNC. So when he asked how he could give and show his support, I told him he could "support the DNC" or "Give to the Clinton-Gore campaign." "Write Mrs. Clinton a note and tell her how much you appreciate the work she is doing for our country," "Help the President's and Mrs. Clinton's Legal Defense Fund" -- these were my standard responses to anyone asking me how they could show their support for the Clintons. I do not remember if I ever responded to Mr. Chung's requests to give money to Mrs. Clinton by directing him to the President and First Lady's Legal Defense Fund, although it is likely that I did. I do know that when Lynn Cutler, one of the founders of the Back to Business Committee, asked if I knew Clinton supporters who would be spokespersons or contributors to the group, Mr. Chung's name was one of the four or five people I recommended she talk to.

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Entry records to the White House complex suggest that Mr. Chung had a picture taken with Mrs. Clinton on the same date he gave me that check to pass along to the DNC. I did arrange for Mr. Chung to use my personal account at the White House lunchroom, possibly more than one time. I did arrange for him to have a picture with Mrs. Clinton. Both arrangements were the type I had made for others -- members of Congress and the Administration, staff, friends, visitors and family on numerous occasions. I needed no special motivation to do for Mr. Chung what I had done for others.

Mr. BURTON. Thank you, Ms. Williams. I will now start our questioning with Mr. Bennett.

Mr. WAXMAN. Mr. Chairman, yes, before you do, I want to apologize that I have to go to another committee where they are holding a hearing on tobacco. I will return in time to ask some questions of you, Ms. Williams.

Mr. BENNETT. Good morning, Ms. Williams.

Ms. WILLIAMS. I'm sorry, I didn't hear your name.

Mr. BENNETT. My name is Dick Bennett. I have been the chief counsel for the last 2 months. I don't believe—you did not testify before the U.S. Senate.

Ms. WILLIAMS. No, I didn't.

Mr. BENNETT. We felt it was important to have you testify here publicly. I thank you for coming and——

Mr. BURTON. Excuse me; could you pull the mic closer to you to be sure to hear you.

Ms. WILLIAMS. Certainly.

Mr. BENNETT. For the record, I note that you are represented by an old friend of mine, Mr. Ed Dennis from Philadelphia. Mr. Dennis, it is nice to see you.

Ms. Williams, if at any time you need to refer to Mr. Dennis, indicate that and I will give you the time. Also, Mr. Lanny Breuer from the White House is back. Mr. Breuer, nice to see you, and we will not call you forward to testify.

Mr. BREUER. I appreciate that.

Ms. WILLIAMS. I have one more thing. Could you explain the lights?

Mr. BENNETT. The lights. The light is green while I am speaking, then it comes to yellow as I begin to—I think it is 3 minutes left and it will turn yellow. When it hits red, I am to stop.

Ms. WILLIAMS. OK.

Mr. BENNETT. And if you see it go red and I am still talking, tell me to shut up. You can tell me that if you want.

Ms. Williams, you served as Chief of Staff to Mrs. Clinton from the very first days of the Clinton administration until May of this year; is that correct?

Ms. WILLIAMS. Yes, sir, that is correct.

Mr. BENNETT. Were you always the Chief of Staff for Mrs. Clinton?

Ms. WILLIAMS. I always felt I was the Chief of Staff.

Mr. BENNETT. And that was your title the entire time you were at the White House?

Ms. WILLIAMS. My entire title was Assistant to the President and Chief of Staff to Mrs. Clinton.

Mr. BENNETT. I think you indicated in your opening statement that Mr. Chung's enthusiasm for Mrs. Clinton bordered on the worshipful. I believe that was your word.

Ms. WILLIAMS. Yes, sir, that was my word.

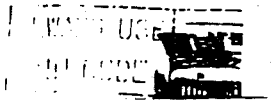
Mr. BENNETT. In fact, Mrs. Clinton had showed some kindness to Mr. Chung previously; had she not? I will put on the screen, if I can, exhibit 232, a letter of April 26, 1993, and the exhibits are

there for you, Ms. Williams, or you can look on the TV screen in front of you. It might assist you.

The letter of April 26, 1993, is a letter to Mr. Chung from Mrs. Clinton, and as you can see, that is not just a form letter; it is a sincere letter noting personal things in Mr. Chung's life, correct?

[Exhibit 232 follows:]

THE WHITE HOUSE
WASHINGTON



THE WHITE HOUSE

April 26, 1993

Mr. Johnny Chung
President & CEO
Telform Inc.
100 North Barranca Avenue
Seventh Floor
West Covina, California 91791

Dear Mr. Chung:

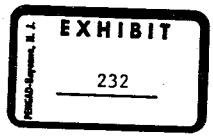
Thank you for your letter and my apologies for not getting back to you sooner.

It appears from the correspondence you have had with federal and state officials, and with the private sector, that you are already on the right track. Nevertheless, I wish you good luck with your innovative system.

Sincerely yours,

Hillary

Hillary Rodham Clinton



F 0018591

Ms. WILLIAMS. I do not know if it's not a form letter.

Mr. BENNETT. It certainly directs attention to personal items in his life; does it not? To your knowledge, she was supportive to Mr. Chung and kind to him; wasn't she?

Ms. WILLIAMS. Yes, she was.

Mr. BENNETT. And, indeed, in terms of your opening statement where you noted that he visited the office——

Mr. LANTOS. Do you have copies of that letter?

Mr. BENNETT. I believe you do as an exhibit, Congressman Waxman. It is exhibit 232 in the exhibit book before you. Exhibit 232 in the exhibit book right before you, sir. Letter of April 26, 1993.

Mr. LANTOS. May I make an inquiry of counsel?

Mr. BENNETT. You certainly may, sir, yes.

Mr. LANTOS. You are referring to this as a letter indicating a personal relationship?

Mr. BENNETT. No, sir, I'm just indicating the kindness that Mrs. Clinton showed to Mr. Chung. I am not indicating a deep personal relationship between Mrs. Clinton and Mr. Chung, no, sir.

Mr. LANTOS. Let me read this letter, to be sure we read the same letter:

> Dear Mr. Chung: Thank you for your letter and my apologies for not getting back to you sooner.
>
> It appears from the correspondence you have had with federal and state officials, and with the private sector, that you are already on the right track. Nevertheless, I wish you good look with your innovative systems. Sincerely yours, Hillary Rodham Clinton.

This is about as nonpersonal a letter as I have ever seen.

Mr. BURTON. The counsel has the time.

Mr. LANTOS. I am not trying to impose on his time. But if he misrepresents a letter, that needs to be pointed out, Mr. Chairman.

Mr. BURTON. Mr. Lantos, you will have time and you can point it out when you have the time. Mr. Bennett.

Mr. LANTOS. I think it is relevant to point it out when it is raised.

Mr. BENNETT. Ms. Williams, with all due respect to Congressman Lantos, you understand my question. I am not asking you with respect to that letter that Mr. Chung was a close personal friend of Mrs. Clinton. With respect to her reference, you're on the right track, I wish you good luck with your innovative system, trying to cast that in as neutral a form as possible, clearly she was wishing him good luck in some venture; isn't that correct from the way you interpret this letter?

Ms. WILLIAMS. Yes, she says I wish you good luck.

Mr. BENNETT. And you don't have any particular knowledge of how well she knew Mr. Chung in April 1993?

Ms. WILLIAMS. No.

Mr. BENNETT. Do you know whether she knew him in April 1993?

Ms. WILLIAMS. In April 1993?

Mr. BENNETT. Yes.

Ms. WILLIAMS. I do not know dates. I can't tell you if she knew him in April 1993.

Mr. BENNETT. When was the first time—I believe you previously indicated to us, and correct me if I am wrong, Ms. Williams, that

you believe you may have first met Mr. Johnny Chung during the campaign of 1992.

Ms. WILLIAMS. No, I first met him early in the Clinton administration. So that would have been early 1993.

Mr. BENNETT. And April 1993 being early when you first met him, do you know whether or not Mrs. Clinton knew him at that time?

Ms. WILLIAMS. The reason why I'm hesitant to respond exactly is because I do not know, one, whether or not this is a form letter or if I had talked to her in April 1993 about knowing Johnny Chung. And, in fact, I actually don't remember seeing this letter until sometime in 1997, I believe.

Mr. BENNETT. Well, you indicated that Johnny Chung visited the office more than most. In fact, the WAVES records, if we can put up exhibit 227, and the chart, page 8 of that exhibit, reflects 22 visits to the First Lady's office in just an 11-month period from March 1995 until February 1996. I think it's on the TV screen in front of you, Ms. Williams. Clearly, Mr. Chung visited the First Lady's office far more than that. He was a constant visitor essentially; wasn't he?

[Exhibit 227 follows:]

Johnny Chung's Visits to White House

DATE	APPT. TIME Actual Enter/Exit	VISITEE	REQUESTOR	LOCATION
2/2/94	1:18 PM TOA 1:27 PM TOD	Foucart	Botwin	Room 1
7/22/94	2:22 PM TOA No TOD	Anderson	Anderson	OEOB 119
8/2/94	7:35 AM TOA 8:46 AM TOD	Lewis	Lewis	OEOB 474
8/4/94	11:45 AM TOA 3:07 PM TOD	Anderson	Anderson	OEOB 115 (maybe 119)
8/5/94	8:39 AM TOA 10:52 AM TOD	POTUS	Dickey	S. Lawn
8/8/94	4:46 PM TOA 7:49 PM TOD	Lewis	Atta	OEOB 115
8/11/94	3:54 PM TOA No TOD	Anderson	Anderson	OEOB 115
8/12/94	5:56 PM TOA No TOD	Lewis	Anderson	OEOB 115
9/20/94	2:57 PM TOA NO TOD	Lewis	Lewis	OEOB 115

1

EXHIBIT
227

9/21/94	3:23 PM/ (illegible)	Quinn	Kelly	OEOB 270
9/23/94	5:33 PM TOA No TOD	Lewis	Lewis	OEOB 119
10/5/94	10:48 AM TOA No TOD	Shakow	Shakow	OEOB 115 (maybe 119)
10/28/ 94	10:24 AM TOA 1:05 PM TOD	Anderson	Anderson	OEOB 115
11/1/94	3:00 PM 2:47 PM TOA No TOD	Eder	Eder	OEOB 122
11/29/ 94	11:45 AM 11:50 AM TOA No TOD	Mitchell	Wozniak	OEOB 487
12/10/ 94	9:00 AM No TOA No TOD	Brown	Brown	Room Illegible
12/19/ 94	12:30 PM TOA illegible No TOD	Lewis	Dunn	OEOB 115
	1:00 PM No TOA No TOD	Anderson	Anderson	OEOB 115

EXHIBIT
227-1

12/20/94	7:30 PM No TOA No TOD	POTUS	Burke	Residence
12/27/94	1:10 PM NO TOA NO TOD	Dunn	Dunn	OEOB 115
1/10/95	7:49 AM	Frankfurter	Frankfurter	100/EW
1/11/95	1:45 PM 1:47 PM TOA No TOD	Dunn	Dunn	OEOB 115
1/12/95	5:00 PM 5:04 PM TOA No TOD	Middleton	Middleton	OEOB 176
1/13/95	11:00 AM 10:44 AM TOA No TOD	Middleton	Dunn	OEOB 176
1/30/95	1:05 PM 1:35 PM TOA No TOD	Dunn	Dunn	OEOB 176
3/8/95	10:00 AM 10:15 AM TOA 10:18 AM TOD	Bailey	Bailey	OEOB 174

EXHIBIT
227-2

3/9/95	11:45 AM 11:37 AM TOA No TOD 2:00 PM 2:13 PM TOA No TOD	Ryan Ryan	Ryan Ryan	OEOB 100 OEOB 100
3/10/95	2:18 PM 2:17 TOA No TOD	Tarmey	Tarmey	OEOB 100
3/11/95	10:10 AM No TOA No TOD	POTUS	Crawford	WW
3/13/95	1:20 PM 1:40 PM TOA No TOD 5:10 PM 5:07 PM TOA No TOD	Ryan Ryan	Ryan Ryan	OEOB 100 OEOB 100
3/14/95	3:00 PM 2:57 PM TOA No TOD	Ryan	Ryan	OEOB 100
3/15/95	1:15 PM 1:21 PM TOA NO TOD	Ryan	Ryan	OEOB 100
3/24/95	10:00 AM 9:46 AM TOA NO TOD	Ryan	Ryan	OEOB 100
5/3/95	1:28 PM TOA 1:42 PM TOD	Ryan	Ryan	OEOB 100

EXHIBIT
227-3

5/4/95	4:05 PM TOA 6:12 PM TOD	Ryan	Ryan	OEOB 100
5/19/95	2:04 PM TOA 2:35 PM TOD	Ryan	Ryan	OEOB 100
	2:34 PM TOA No TOD	Matsui	Shulman	OEOB 450
5/24/95	11:01 AM TOA No TOD	Ryan	Ryan	OEOB 100
7/10/95	3:11 PM TOA 4:04 PM TOD *3:13 PM Entering* *4:03 PM Exiting [E-Pass]*	Ryan	Ryan	OEOB 100
7/11/95	4:54 PM TOA 5:23 PM TOD *4:54 PM Entering* *5:22 PM Exiting [E-Pass]*	Ryan	Ryan	OEOB 100
	6:30 PM TOA Unlisted TOD Unlisted	POTUS	Widdess	State F

EXHIBIT
227-4

7/21/95	*10:54 AM TOA* *1:35 PM Exiting [E-Pass]* 3:20 PM TOD	Ryan	Ryan	OEOB 100
9/25/95	10:36 AM TOA 12:02 PM TOD 4:34 PM TOA 5:22 PM TOD	Ryan McCoy	Ryan Ryan	OEOB 100 101/EW
9/26/95	11:32 AM TOA 1:49 PM TOD *11:56 AM Entering* *1:46 PM Exiting [E-Pass]*	Ryan	Ryan	OEOB 100
10/16/95	10:30 AM [WAVES] *10:50 AM Entering* *12:18 PM Exiting [E-Pass]*	Ryan	Ryan	OEOB 100

EXHIBIT
227-5

10/19/95	1:20 PM 1:45 PM TOA [WAVES] *1:45 PM Entering* *2:13 PM Exiting [E-Pass]* 4:00 PM 4:27 PM TOA No TOD	Ryan Ryan	Ryan Ryan	OEOB 100 OEOB 100
10/26/95	11:30 AM No TOA No TOD	Phillips	Phillips	OEOB 478
10/28/95	11:30 AM 11:33 AM TOA No TOD	Brown	Brown	OEOB 578
12/8/95	2:45 PM TOA 2:32 PM TOD	McCoy	McCoy	101 EW
2/9/96	2:29 PM TOA/*Entering* [WAVES & *E-Pass*] 3:15 PM TOD/*Exiting* [WAVES 7 *E-Pass*]	Ryan	Ryan	OEOB 100

6/15/96	3:00 PM *3:07 PM Entering* *3:36 PM Exiting [E-Pass]*	Forster	Forster	WW

EXHIBIT
227-7

Johnny Chung's Access to the First Lady's Office

DATE	APPT.	ARRIVAL	DEPARTURE	VISITEE	REQUESTOR	LOCATION
3/9/95	11:45 AM	11:37 AM	No TOD	Ryan	Ryan	OEOB 100
3/9/95	2:00 PM	2:13 PM	No TOD	Ryan	Ryan	OEOB 100
3/10/95	2:18 PM	2:17 PM	No TOD	Tarmey	Tarmey	OEOB 100
3/13/95	1:20 PM	1:40 PM	No TOD	Ryan	Ryan	OEOB 100
3/13/95	5:10 PM	5:07 PM	No TOD	Ryan	Ryan	OEOB 100
3/14/95	3:00 PM	2:57 PM	No TOD	Ryan	Ryan	OEOB 100
3/15/95	1:15 PM	1:21 PM	No TOD	Ryan	Ryan	OEOB 100
3/24/95	10:00 AM	9:46 AM	No TOD	Ryan	Ryan	OEOB 100
5/3/95	None listed	1:28 PM	1:42 PM	Ryan	Ryan	OEOB 100
5/4/95	None listed	4:05 PM	6:12 PM	Ryan	Ryan	OEOB 100
5/19/95	None listed	2:04 PM	2:35 PM	Ryan	Ryan	OEOB 100
5/24/95	None listed	11:01 AM	No TOD	Ryan	Ryan	OEOB 100
7/10/95	None listed	3:11 PM 3:13 PM E-Pass	4:04 PM 4:03 PM E-Pass	Ryan	Ryan	OEOB 100
7/11/95	None listed	4:54 PM 4:54 PM E-Pass	5:23 PM 5:22 PM E-Pass	Ryan	Ryan	OEOB 100
7/21/95	None listed	10:54 AM	3:20 PM 1:35 PM E-Pass	Ryan	Ryan	OEOB 100
9/25/95	None listed	10:36 AM	12:02 PM	Ryan	Ryan	OEOB 100
9/25/95	None listed	4:34 PM	5:22 PM	McCoy	Ryan	OEOB 100
9/26/95	None listed	11:32 AM 11:56 AM E-Pass	1:49 PM 1:46 PM E-Pass	Ryan	Ryan	OEOB 100
10/16/95	10:30 AM	10:50 AM E-Pass	12:18 PM E-Pass	Ryan	Ryan	OEOB 100
10/19/95	1:20 PM	1:45 PM 1:45 PM E-Pass	2:13 PM E-Pass	Ryan	Ryan	OEOB 100
10/19/95	4:00 PM	4:27 PM	No TOD	Ryan	Ryan	OEOB 100
2/9/96	None listed	2:29 PM 2:29 PM E-Pass	3:15 PM 3:15 PM E-Pass	Ryan	Ryan	OEOB 100

EXHIBIT
227-8

Ms. WILLIAMS. Yes. Yes, as I said in my statement.

Mr. BENNETT. And do you recall a woman named Gina Ratliffe who worked in the First Lady's office with you?

Ms. WILLIAMS. Yes, she was an intern.

Mr. BENNETT. Do you recall introducing Mr. Chung to Ms. Ratliffe, and I believe she says at pages 34 and 35 of her deposition, and the depositions are in front of you, I don't think you really need to stop, I will just represent a statement she made and I want to know if you concur with that. She indicated that you took Mr. Chung to see her and said something to the effect, this guy is coming in, he is a big DNC donor, his name is Johnny Chung. Do you recall anything to that effect?

Ms. WILLIAMS. No, I can't recall why I would introduce Johnny Chung to an intern or I wasn't in the habit of making introductions for Johnny Chung.

Mr. BENNETT. So you have no recollection of that event?

Ms. WILLIAMS. No, I do not.

Mr. BENNETT. Directing your attention with respect to contributions by Mr. Chung, do you have any knowledge of contributions by Mr. Chung which would have been made to the Democratic National Committee, President Clinton's legal defense fund, or his election campaign prior to November 1994?

Ms. WILLIAMS. Prior to November 1994?

Mr. BENNETT. Of 1994.

Ms. WILLIAMS. I wouldn't know that.

Mr. BENNETT. He was, in fact, to your knowledge, a trustee of the Democratic National Committee.

Ms. WILLIAMS. I believe that he was a trustee.

Mr. BENNETT. Do you have any personal knowledge of any solicitation of Mr. Chung either by the President or the First Lady at any time?

Ms. WILLIAMS. No, I do not.

Mr. BENNETT. Do you have any knowledge—prior to February 1995, do you have any knowledge of any requests made by Mr. Chung upon either the President or the First Lady or the Democratic National Committee?

Ms. WILLIAMS. Prior to February——

Mr. BENNETT. Prior to February 1995.

Ms. WILLIAMS. No, do I have any knowledge? No.

Mr. BENNETT. Directing your attention to February 1995, you did become aware at that time, did you not, that there were certain requests that Mr. Chung was making? And to assist you I would ask that we put up exhibit 171. And, again, these are in the exhibit books for the Members on the table. Exhibit 171 was a list Mr. Chung gave to Richard Sullivan of the Democratic National Committee indicating that a delegation from China will be coming in March and seeking assistance in arranging certain benefits.

Have you seen this document before, Ms. Williams?

[Exhibit 171 follows:]

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

February 27, 1995
(Via Fax)

Mr. Richard Sullivan
DNC
(202)863-7187

Dear Richard,

How are you? I am going to need your help again. I am bringing with me the delegation from China. This is a group of very important and powerful business leaders from China. They will be in D.C. from 3/7 to 3/11 and will be staying at J.W. Marriott, (202) 393-2000, 1331 Pennsylvania N.W. Washington DC. Enclose please find the name list and their personal information.

As I have mentioned on the phone, their main purpose would be as follows:

1) Meet President Clinton

Meet Don Fowler

2) Meet Vice President Al Gore

3) Have lunch at the Mess (White House)

4) Tour the White House

5) Meet Secretary Ron Brown

Please help me make arrangements accordingly. Thank you in advance for all your help. I will see you soon.

Sincerely,

Johnny Chung
Chairman/CEO

JC:iw
Encl.

EXHIBIT
171

DNC 3233326

Name List of Delegation

1.) **Hongye Zheng**
Chairman, China Council for the Promotion of International Trade (CCPIT)
Chairman, China Chamber of International Commerce (CCOIC)

2.) **Huaren Sheng**
President, China Petro-Chemical Corporation

3.) **Jichun Huang**
Vice President, China International Trust and Investment Corporation

4.) **Renzhong Wang**
Vice Chairman & President, Shanghai AJ Shareholding Corporation

5.) **James J. Sun**
Young Entrepreneur of Xinjiang, self made multi-millionaire, Urumqi Taihe Industry Co.

Entourage

1.) **Jianlong Yu**
Chief, American & Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

2.) **Suxin Tang**
Secretary to Mr. Huaren Sheng

3.) **Jie Tang**
Interpreter, SINOPEC

AISI Representatives

1.) **Johnny Chung** - Chairman/CEO

2.) **Art Liang** - Managing Director/Executive V.P.

DNC 3233327

Resume

Zheng Hongye

Mr. Zheng Hongye was born in Harbin, Heilongjiang Province in September 1929. He was engaged in trade and economic affairs in the Northeast Region of China from 1947 to 1954; transferred to the China Council for the Promotion of International Trade(CCPIT) in 1955 and worked as Deputy Division Chief successively in the Department of Foreign Exhibition in China, Liaison Department and Department of Chinese Exhibitions Abroad; served as Commercial Councilor of the Chinese Embassy in Australia and then in Greece from 1973 to 1979; became Deputy Director and then Director of the Liaison Department of CCPIT in 1979; appointed Vice Chairman of CCPIT in 1981; served as Minister-Counsellor(Commercial) of the Chinese Embassy in Japan 1984; resumed his post as Vice Chairman of CCPIT after he returned from Japan in 1986; concurrently became Vice Chairman of the China Chamber of International Commerce(CCOIC) in 1988. He assumed the post as Acting Chairman of CCPIT and CCOIC since October 1989.

Mr. Zheng Hongye is a member of the Seventh and Eighth Chinese People's Political Consultative Conference, Chairman of the China International Economic and Trade Arbitration Commission, Chairman of the China Maritime Arbitration Commission, Chairman of the Economic and Trade Coordination Committee for the Two Sides of the Straits, Chairman of the Association of China Foreign Service Trade and a concurrent professor of Xiamen University. Mr. Zheng Hongye is also Chairman of the China Committee of the International Chamber of Commerce.

Sheng Huaren

Mr. Sheng Huaren, born in September 1935, is President of China Petro-Chemical Corporation, Chairman of China International United Petroleum and Chemicals Co. Ltd, and concurrently Vice Chairman of China-Korea Economic Council.

Mr. Sheng was born in Yancheng city, Jiangsu Province. He studied in Subei Cooperative Insititute for Cadres in Yangzhou city, Jiangsu Province in 1951. He used to be a statistician and plan-drafter in Subei General Cooperative Commune and the Finance and Econonmy Committee of Subei Administrative Office; apprentice, technician and deputy site director of Nanjing Construction Company; Deputy Director of the Long-term Planning Department in the Ministry of Combustible Chemical Industry and the Ministry of Petro-chemical Industry; Vice President of China Petro-chemical Corporation.

EXHIBIT
171--2
DNC 3233328

Huang Jichun

Mr. Huang Jichun, Director and Vice President of China International Trust and Investment Corporation(CITIC), was born in 1933. He graduated from the University of Northeast Technology, China in 1955 and attended the Executive Program in Business Administration(EPBA) of Columbia University, U.S.A. in 1989. Mr. Huang is acting also as a professor and senior engineer as well as the Executive Director of China Nonferrous Metals Society, a member of American Society of Metals and a member of Chinese Society of Investment.

In CITIC, Mr. Huang is in charge of investment and trade both at home and abroad as well as enterprise management.

Mr. Huang's professional capability is specifically excellent in the metal and material fields. He used to be responsible for the scientific and technical R & D, production management and foreign trade of nation-wide non-ferrous metals sector during 1983 to 1987 as Vice President of China National Non-ferrous Metals Industry Corporation. Mr. Huang was also heavily engaged in elaborating the long-term strategic plan for the scientific and technical development of the Chinese metallurgical industry while working in the Ministry of Metallurgical Industry from 1956 to 1982. He is very experienced in production, management and foreign trade and can manage English as a working language very well.

Wang Renzhong

7/1992-Present	Shanghai AJ Corporation, Shanghai Vice Chairman, President(C.E.O.)
11/1990-7/1992	Shanghai Patriotic Construction Corp. Vice Chairman, President
2/1986-11/1990	Shanghai Investment & Trust Corp. Board Director, Executive Vice President in charge of international trading, investment and other technology related business
1/1985-2/1986	Shanghai Investment & Trust Corp. Senior Vice President responsible for all international trading
2/1976-12/1984	Bureau of Aerospace Industry, Shanghai Director of Quality Assurance, Chief Production Engineer and Standing Member of Science and Technology Commission
3/1963-2/1976	Plant No.155 of the China Aviation Industry Ministry, Harbin

EXHIBIT

171-3

DNC 3233329

8/1952-3/1963	Plant No. 120 of the China Aviation Industry, Harbin Superintendent, Production Engineer
Technical Title:	Researcher
Education:	Graduate of the Yenching University, Beijing
Personal:	Born in China on May 1932, Married

EXHIBIT
171--4
DNC 3233330

Resume

James J. Sun

Mr. Sun was born on November 28, 1962 in Her Nan Province, China. He is the President of Xinjiang Taihe Enterprise Group Co. Ltd. and also a self made millionaire. He formed the Taihe Enterprise in 1990. Currently the Taihe Group consist of Taihe Real Estate Co. who's projects includes the four star Taihe Hotel in Urumqi, Taihe Kangle Developing Co. and Taihe Battery Co.

EXHIBIT
171--5
DNC 3233331

AISI Representatives

1.) **Johnny Chung** - Chairman/CEO

2.) **Art Liang** - Managing Director/Executive V.P.

3.) **Irene Wu** - Delegation Administrtor

4.) **George Liu** - Special Assistant to Chairman (East Coast)

5.) **David Chen** - Special Assistant to Chairman (Beijing)

6.) **Nancy Zhao** - Secretary to Chairman/CEO

EXHIBIT
171-6
DNC 3233332

Ms. WILLIAMS. Only at the time of my depositions.

Mr. BENNETT. In fact, with respect to this request of the Democratic National Committee on February 27th, it was followed the next day by a request of the White House, and I'd ask to be put up exhibit 172. And this was a request to the Visitors Office of the White House.

Can you see that, Ms. Williams?

[Exhibit 172 follows:]

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

February 28, 1995
(Via Fax)

Ms. Ann McCoy
Visitor's Office
The White House
Fax: (202) 456-2370

Dear Ann,

How are you? I would like to request for your assistance again. I am bringing with me the delegation from China. This is a group of very important and powerful business leaders from China. They will be in DC from 3/7 to 3/ 11, and as usual, please arrange for a tour of the White House. I have asked Mr. Richard Sullivan, Mr. Eric led of DNC and Mr. Mark Middleton to assist me in arranging a meeting with President Clinton, Vice President Al Gore and a lunch at the Mess in the White House. It would be ideal if you could arrange a tour either before or after the lunch at the Mess.

Thank you very much for all your help. See you soon.

Best regards,

Johnny Chung
Chairman/CEO

JC:iw

EXHIBIT
172

Ms. WILLIAMS. Yes.

Mr. BENNETT. Wherein Mr. Chung references the same trip by important and powerful business leaders of China, have you previously seen that document?

Ms. WILLIAMS. Only at the time of my deposition.

Mr. BENNETT. Did you have knowledge of essentially what we would define as I guess a wish list of Mr. Chung reflected by exhibit 171 in terms of certain things he was hoping—certain benefits he might receive? Did you have knowledge of his request in that regard?

Ms. WILLIAMS. Only knowledge in terms of having seen both these letters at my deposition that there existed a wish list.

Mr. BENNETT. At the time, did you have any knowledge in February or March 1995, that he wanted to meet the President and meet the Vice President and have lunch at the White House Mess?

Ms. WILLIAMS. In February, I had no knowledge of what he wanted.

Mr. BENNETT. Ultimately by March, then, you did obtain some knowledge of some of these requests by Mr. Chung, then; didn't you?

Ms. WILLIAMS. Well, not obtain some knowledge. I mean, although I have never been certain of the dates or the time, but at some point in time, Mr. Chung made a direct request to my office for a picture with Mrs. Clinton. I don't know if it was the first time or the second time, but I know he'd had many pictures with Mrs. Clinton prior to that, and also he made a request to use my White House Mess account. So that's when I had knowledge of his requests.

Mr. BENNETT. And I'm not asking you to specify a particular date, but at some point in time you knew there were certain courtesies he wanted to have extended to him, correct?

Ms. WILLIAMS. Well, I believe that in my mind when you talk about certain courtesies, he made requests like hundreds of other people make requests to have a picture taken with Mrs. Clinton. As I said in my deposition, there came a time when he made that request to my office and we handled it pretty much in the same way that we would handle any other picture request coming from anyone, quite frankly.

Mr. BENNETT. Well, actually picking up on the comments made by Congressman Waxman—it might set a precedent for majority counsel quoting from the minority side—Congressman Waxman made an important point I think that clearly there are many, many people across the country who would want to come to the White House and have their picture taken with the First Lady, and clearly Mr. Chung with his access that he had procured in one form or another, unlike many, many other people across the country, Mr. Chung, in fact, was able to get his picture taken with the First Lady; isn't that correct?

Ms. WILLIAMS. That's correct. But if I may take just a moment, counsel, to explain a little bit about the White House, the First Lady's office's particular process for handling picture requests. I think that might shed some light on why we did not treat Mr. Chung's request as a particular request.

Mr. BENNETT. If I might, I don't really want to go into this point. It's not that I am wanting to cut you off but I have a limited amount of time. I am not suggesting any impropriety on your part.

Ms. WILLIAMS. But I actually believe that it will shed some clarity and I think it is important. I am really hopeful that the chairman will give you more time.

Mr. BENNETT. That's fine, go ahead, Ms. Williams, we want to hear what you have to say. Go ahead on that one.

Ms. WILLIAMS. Very early on we discovered that the number of requests that came for pictures with Mrs. Clinton were huge. And these were not just requests from donors, although there would be requests from donors, but there would be requests from interns, from people who would be visiting the White House on that day, and I mean really visiting the White House on that day, groups of people who were coming into the White House, and we decided that we needed a way to be able to accommodate quickly a huge number of pictures and be able to turn around on a dime. And so we developed a system within our office by which if Mrs. Clinton had an occasion to be leaving the White House as she did, to be going somewhere, walking out the door, we were sure of two things: she would have a photographer with her and she would also have her makeup on. These would be two clearly essential things to have in order to have any kind of a picture.

And so because we wanted to accommodate huge numbers of pictures, what we could simply do in the morning was to check her schedule, see if she was on her way anywhere, and anyone who would ask for a picture that day or the previous day could get a picture by seeing her on her way out. She would not have to spend a long period of time with them, she would take the picture, and that way we could accommodate huge numbers of people. And so that was the process by which Johnny Chung came to get this particular picture.

Mr. BENNETT. And Johnny Chung was clearly at her office with such frequency that it wasn't difficult to find a time to allow her to see him, I gather.

Ms. WILLIAMS. Quite frankly, it had nothing to do with the frequency of Johnny Chung being in her office. If you had called me and I knew you and you called me Monday morning and you say, listen, Maggie, my mom and dad are in town. What they really want is a picture with Mrs. Clinton today. Is that possible? I would say, 1 second, Mr. Counselor, let me check her schedule today. I see that she's on her way to give a speech at the AFL–CIO. I think it's possible. And I would have someone clear in your mom and dad and have the picture taken.

Mr. BENNETT. Well, I think under the present circumstances I'm not sure I could have my picture taken with Mrs. Clinton, but I will certainly ask Mr. Breuer if the occasion arises.

Directing your attention to March 1995, there were, in fact, a series of unpaid bills for collection issued in connection with some political activity which had been held at the White House; isn't that correct?

Ms. WILLIAMS. Well——

Mr. BENNETT. To assist you, if we could put up exhibit 255, and looking at exhibit 255, this is a memorandum which I believe you

received, Ms. Williams, in March 1995 from the Usher's Office in connection with many unpaid bills for collection. Included among those bills were receptions in connection with the Democratic National Committee.

And clearly as to those political bills they could not be paid out of the normal White House budget so they were bills that needed to be paid and needed to be paid by the Democratic National Committee; isn't that correct?

[Exhibit 255 follows:]

THE WHITE HOUSE

WASHINGTON

March 24, 1995

MEMORANDUM FOR: MARGARET A. WILLIAMS

FROM: GARY J. WALTERS

SUBJECT: BILLS FOR COLLECTION

The following information is provided concerning unpaid bills for collection issued by the Executive Residence at the White House for fiscal years 1994 & 1995. Fiscal year 1993 bills are paid.

With all previous bills having now been paid, it is very obvious that unpaid bills are attributed to the DNC.

Bill #	Expenses	Event	Action
Fiscal Year 1994 - October 1, 1993 to September 30, 1994			
94-0021	41,291.89	Holiday Events	PARTIALLY PAID DNC*
94-0042	14,534.65	DNC Reception	? DNC
94-0043	47.06	DNC Lunch w/Mrs. Clinton	? DNC
94-0047	4,280.33	U. S. Olympic Comm.	Social Ofc. contact
94-0054	14,063.03	Mother's Day Health Care Event (tent)	Robyn Dickey Mickey Iberra
94-0066	10,568.52	African American Constituents	? DNC
94-0070	30,053.80	Business Leaders Forum	? DNC
94-0072	11,131.96	California Day	? DNC
94-0073	18,917.29	DNC Dinner	? DNC

Remaining to be paid by the DNC - FY 94 $135,345.25

EXHIBIT 255

DNC 3078128

Current Fiscal Year 1995 - October 1, 1994 to date

95-0008	8,931.64	Michigan Day	DNC Attn: Joan Kenny
95-0010	10,075.57	Tennessee Day	DNC Attn: Tony Lewis
95-0011	19,622.27	DNC Dinner	DNC Attn: Bob Watson
95-0015A	3,857.72	Political Supporters	DLC
95-0015C	3,857.72	Political Supporters	DNC Attn: Bob Watson
95-0017	4,805.80	Michigan Day	Bill not submitted - No Address (DNC ?)
95-0019	10,941.03	New Jersey Day	Bill not submitted - No Address (DNC ?)
95-0026	15,174.58	** DNC Group	DNC Attn: Bob Watson
95-0027	19,054.62	** Arkansas Group	DNC Attn: Bob Watson
95-0028	16,321.19	** Political Reception	DNC Attn: Bob Watson
95-0029	18,466.94	** DNC Group	DNC Attn: Bob Watson
95-0031	13,639.71	** Holiday Reception (Various Groups)	Bill not submitted - No Address (DNC ?)
95-0032	17,975.82	** Holiday Reception (Press Corps)	Bill not submitted - No Address (DNC ?)
95-0033	24,122.62	** Holiday Reception (Press Corps)	Bill not submitted - No Address (DNC ?)
95-0034	23,681.94	** Holiday Reception (Various Groups)	Bill not submitted - No Address (DNC ?)
95-[illegible]	[illegible]6.19	** Holiday Dinner (Yale Dinner)	Bill not submitted - No Address (DNC ?)
95-0036	19,503.20	** Holiday Reception (Arkansas Group)	Bill not submitted - No Address (DNC ?)
95-0037	37,454.99	** Holiday Reception (White House Staff)	Bill not submitted- No Address (DNC ?)
95-0038	12,458.16	** Holiday Reception (Residence Staff)	Bill not submitted - No Address (DNC ?)

DNC 3078129

EXHIBIT

255-1

95-0041	2,509.27	Breakfast Democratic Congresswomen	Bill not submitted - No Address (DNC ?)
95-0042	280.34	Meeting w/Democratic Congressmen	DNC Attn: Bob Watson
95-0046	492.54	Luncheon w/Democratic Congressmen	DNC Attn: Bob Watson
95-0049	14,984.69	DNC - Texas Group	DNC Attn: Bob Watson
95-0050	15,400.07	DNC Trustees	DNC Attn: Bob Watson
95-0051	13,436.56	DNC Trustees	DNC Attn: Bob Watson

Total amount of Bills for Collection unpaid for Fiscal Year 1995 that are listed above as being attributed to or having already been submitted to the DNC $341,857.40

* Partial payment of $198,714.56 made on 3/15/95.
  Left unpaid are holiday receptions for the following:

12/14/93 Press receptions I & II	$16,875.28
12/15/93 Press receptions III & IV	16,199.47
12/22/93 Residence Staff reception	8,217.14
Total unpaid from bill 94-0021	$41,291.89

** Bills for Collection 0026 through 0038 are holiday bills historically paid by the national political committees as they are for holiday receptions; decision has not been made as to billing address, if any.

EXPENSE ACCOUNTS

REIMBURSABLE EVENTS

3948-1106-642	Executive Residence Staff Overtime Pay - staff regular pay is not charged against the event
3948-2401-642	Calligraphy (invitations, programs, etc.)
3948-2506-642	Other Charges (tents, paper goods, entertainers expenses, equipment rental, etc.)
3948-2508-642	Extra Labor (kitchen staff, butlers, cleaning staff, florists, etc.)
3948-2608-642	Florists Supplies and Flowers.
3948-2621-642	Staff Food and Beverage - when staff is required over a meal period the meals served to extra staff are part of the event costs
3948-2622-642	Food and Beverage
3948-2630-642	National Park Service Expenses

DNC 3078131

EXHIBIT
255--3

Ms. WILLIAMS. Yes, sir——

Mr. BENNETT. I think at the bottom of that document——

Ms. WILLIAMS. I'm not quite finished. I'm sorry; I wasn't quite finished with my response.

Mr. BENNETT. Go ahead.

Ms. WILLIAMS. I said yes, but one of the things that I wanted to make sure was noted was that in addition to the DNC bills on here that are unpaid, that there are other organizations on this same memo whose bills are not paid, for instance, the U.S. Olympic Committee. Here there's a mother's day health care event with a different sponsor. I will agree that the majority of the bills listed here have to do with the DNC.

You'll also notice that there are a number of bills—a number of items or entries on this list where no bill has been submitted at all to the DNC. And so what we have is not just a list of DNC bills unpaid, but a list of bills that were unpaid from a number of different organizations, including the DNC.

Mr. BENNETT. And so we are clear, in fairness to you, Ms. Williams, I'm not suggesting that all the items on that exhibit—those two pages are bills that cannot be paid out of the White House budget, but clearly there are some that could not be paid and had to be paid by the Democratic National Committee, that was my point.

Ms. WILLIAMS. Actually, there is a big confusion on that point because——

Mr. BENNETT. If I could at least reference the document—I am not trying to cut you off, but I am looking at the time on this and I'm looking at the bottom of the document before you on the screen which indicates particularly there is certainly over $135,000, which is to be paid by the DNC. Do you see that entry there?

Ms. WILLIAMS. I do, but once again, I'm going to have to interrupt you because I want there to be some clarity about what this document actually represents.

Mr. BENNETT. Absolutely. Go right ahead.

Ms. WILLIAMS. These bills are not bills that would have been paid out of any White House budget whatsoever. I believe what you said in your earlier statement that, of course, these bills would not be paid out of the White House budget. No. No bill listed here would have been paid.

The point I was simply trying to make is that this is not a document that says the DNC has unpaid bills. It does say that, but in addition what it says is that the U.S. Olympic Committee has unpaid bills. It says that another organization has unpaid bills. That there are people who come and use the White House, the Kennedy Center, all kinds—in fact, there are very few events that are actually paid for by the official White House budget. In fact, most of them are paid for by the DNC or a sponsoring organization. Only the congressional Christmas party is paid for out of the official White House budget, in fact. So I just wanted to be clear that this represents a number of organizations who owed money.

Mr. BENNETT. I understand.

Ms. WILLIAMS. OK.

Mr. BENNETT. With respect to this indebtedness, you were here and saw the tape of the interview with Mr. Chung by Tom Brokaw

played by the chairman; did you not? You saw the tape we played today of the Tom Brokaw interview?

Ms. WILLIAMS. Yes.

Mr. BENNETT. Had you seen that interview before?

Ms. WILLIAMS. No, I had not.

Mr. BENNETT. With respect to the contention of Mr. Chung that essentially someone urged him to make a $50,000 contribution to deal with this kind of debt, did you, Ms. Williams, ever specifically solicit $50,000 of Mr. Chung to assist in the repayment of some of this money to the Democratic National Committee to pay some of these debts?

Ms. WILLIAMS. No, I did not. As I said in response to Mr. Chung asking how can I help Mrs. Clinton, or I would like to give money directly to Mrs. Clinton, I did say, support the DNC, support these other organizations, so I had said that to him, yes.

Mr. BENNETT. Do you have any knowledge—I believe Evan Ryan was your assistant?

Ms. WILLIAMS. That's correct.

Mr. BENNETT. And for the record, Mr. Chairman, Mrs. Ryan is presently out of the country and traveling with the First Lady and was unable to be here today and perhaps can appear at a later date.

Do you have any knowledge of Ms. Evan Ryan ever mentioning to Mr. Chung that he could make a $50,000 contribution in order to cover some of this debt?

Ms. WILLIAMS. No, I have no knowledge of that.

Mr. BENNETT. And then showing you exhibit 174, that, in fact, is the $50,000 check to the DNC. Did you, in fact, look at that check when you received it in your office, Ms. Williams?

[Exhibit 174 follows:]

JOHNNY CHUNG
KATHARINA T. CHUNG
[redacted]

844

3-9 95

Pay to the order of DNC $ 50,000.00

Fifty Thousand and 00/100 Only

CALIFORNIA FEDERAL BANK F.S.B.
LOS CERRITOS OFFICE
410 LOS CERRITOS CENTER
CERRITOS CALIFORNIA 90701

For

[redacted] :0844 [redacted] ⑈0005000000⑈

JCH796

JC 796

Given to Maggie Williams at First Lady's Office same day as Chinese delegation meeting with Hillary Rodham Clinton and lunch at White House Mess.

03/21/95
1220096611 27

LA MR 95 22 02

PROCESSED
0880-0738-7

NATIONSBANK
22[redacted]
[redacted]

EXHIBIT
174

JCH797

JC 797

Ms. WILLIAMS. No, my——

Mr. BENNETT. Do you know how much the check was for?

Ms. WILLIAMS. No, I did not.

Mr. BENNETT. And exactly how was the check handed to you?

Ms. WILLIAMS. As I—let me just refer to my statement.

Mr. BENNETT. Certainly.

Ms. WILLIAMS. As I—again, Mr. Chung came to the Old Executive Office Building. I'm not certain where, but either in the reception area of my office or it could have been in the hallway in front of my office he handed the check to me. I was either coming or going some place is what I recall.

Mr. BENNETT. Ms. Williams, I'm going to play you a tape, if I can, Mr. Chairman, of the testimony of Richard Sullivan before the Senate. Do you know Richard Sullivan?

Ms. WILLIAMS. I've met Richard Sullivan. I don't know him well.

Mr. BENNETT. He's an official with the Democratic National Committee. Did you have a chance to hear his Senate testimony?

Ms. WILLIAMS. No.

Mr. BENNETT. Ms. Williams, I will just play a brief portion of this, Mr. Chairman.

[Video tape presentation was shown.]

Mr. BENNETT. Did Mr. Sullivan ever indicate such concerns to you?

Ms. WILLIAMS. No, he did not.

Mr. BENNETT. Let me ask you this: How would Johnny Chung in the statement he made to Tom Brokaw, in the discussion about holiday bills, bills that were owed, helping out paying bills, how would Johnny Chung know that there was money owed, that there were debts that someone needed help paying bills unless someone from your staff told him?

Ms. WILLIAMS. Well, I believe you'd have the opportunity to ask him that tomorrow.

Mr. BENNETT. And hopefully he will answer, but I'm asking you. Do you have any explanation as to how he would know of these debts and these problems and trying to pay bills?

Ms. WILLIAMS. No.

Mr. BENNETT. And how he would come up with the figure of $50,000 and have any knowledge of this? Do you personally have any knowledge of how he would know?

Ms. WILLIAMS. No, I do not. No.

Mr. BENNETT. And you yourself didn't speak with him about these bills?

Ms. WILLIAMS. No, I cannot recall a time that I did.

Mr. BENNETT. And you don't have any personal knowledge yourself of any member of your staff speaking with him; is that correct?

Ms. WILLIAMS. I have no personal knowledge of that.

Mr. BENNETT. That is to say you don't deny that he may or may not, you just don't have any personal knowledge of that?

Ms. WILLIAMS. I have no personal knowledge of that. I don't quite——

Mr. BENNETT. Looking at exhibit 171 just very quickly again, if we can.

[Note.—Exhibit 171 may be found on pp. 31 to 37.]

Ms. WILLIAMS. I'm sorry.

Mr. BENNETT. Go ahead.

Ms. WILLIAMS. I think I maybe missed something in that question.

Mr. BENNETT. What I'm trying to clarify is, I understand that you have testified that you did not speak with Mr. Chung about these debts, that you did not solicit $50,000 from him. My question to you was how he would know——

Ms. WILLIAMS. Right.

Mr. BENNETT [continuing]. Of these debts, and my question was as to members of your staff, you have testified that you have no personal knowledge one way or the other whether or not they solicited him. You just don't know essentially.

Ms. WILLIAMS. Right. I thought that's what I said. I didn't understand the question.

Mr. BENNETT. With respect to exhibit 171, the wish list, ultimately, many of the items on this wish list were satisfied; weren't they? In fact, I think essentially all of them, other than meeting with the Vice President, were ultimately satisfied; weren't they? He did get to meet with President Clinton? He did have lunch in the White House Mess, going down that list, to your knowledge; isn't that correct?

Ms. WILLIAMS. Oh, yes, I know he had lunch in the White House Mess.

Mr. BENNETT. Let me go into again in terms of certain matters in terms of followup and cover a couple of points within the time allowed here.

Mrs. Ryan is presently out of the country, as I said, Ms. Williams, but her deposition transcript is before you, and referencing pages 110 to 112, if you will take a minute to look at that.

Ms. WILLIAMS. OK.

Mr. BENNETT. And it is also available for Members of the minority. Mrs. Ryan has testified that when she told you that Mr. Chung was in the office, and he had some businessmen from China and wanted these various perks, she has testified that she also told you that he was going to be donating money to the DNC, and Mrs. Ryan describes your response as follows, and it's page 110 of her deposition: "Her response was we could see, you know, we'd see if we could set those things up for him and that was helpful to know about his donation because then maybe that would enable the DNC to pay off some of their debts."

Do you see that testimony of Mrs. Ryan in her deposition, Ms. Williams?

Ms. WILLIAMS. Yes, I do.

Mr. BENNETT. Do you ever recall saying that to Evan Ryan, specific reference to paying off the debts and seeking money from Mr. Chung?

Ms. WILLIAMS. No, I did not. Mrs. Ryan knew, as did other people in my office, that the DNC along with other organizations had outstanding debts. That wasn't a secret. But I don't recall discussing it with Ms. Ryan in relationship to Mr. Chung specifically.

Mr. BENNETT. Mr. Chairman, I know that the red light has lit but I believe that the witness indicated at one point in time that I gave her some more time and she asked if you would give me some time.

Mr. BURTON. Yes, Mr. Lantos—there were interruptions, so we will allow a little more time.

Mr. BENNETT. Thank you. If I could have 5 more minutes, Mr. Chairman.

One other thing, Ms. Williams, I meant to ask you, the interview with Tom Brokaw, Mr. Chung stated that he was told by Mrs. Ryan that Mrs. Clinton knew of this $50,000 donation. That's what he says on the tape. Do you know whether Mrs. Clinton knew of this donation?

Ms. WILLIAMS. I didn't tell her. I don't know why she would know.

Mr. BENNETT. To your knowledge—you have no knowledge one way or another. You did not speak with Mrs. Clinton about the donation?

Ms. WILLIAMS. No, I did not.

Mr. BENNETT. With respect to followup by Mr. Chung ultimately, exhibit 259, if I can, exhibit 259 before you is, I think, Mr. Chung contacting you concerning procuring these photographs, do you see that, Ms. Williams?

[Exhibit 259 follows:]

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

April 5, 1995
(Via Fax 202 456-6244)

Margaret Williams
Assistant to the President and
Chief of Staff to the First Lady
The White House
Washington, D.C. 20506

Dear Ms. Williams,

I have an important issue here that needs your assistance. As you always know, I am 100% supportive of the First Lady's Office and I am always delighted to work with DNC at every occasion. The China Business Delegation led by Chairman Zheng Hongye met with President Clinton and took some pictures after the radio address on March 11, 1995. It's been over three weeks, I have not seen any of the pictures. I have learned from Mr. Richard Sullivan of DNC that the National Security Council is holding on to those pictures.

In my opinion, if we allow them to take the pictures with our President then we should be courteous enough to let them have the pictures. I am going to China next week and I do need to bring those pictures with me. I have run out of excuses to tell them why the pictures are taking forever. I really appreciate your help in solving this minor issue.

I look forward to seeing you this weekend at Mr. Steven Spielsberg's party. Thank you again for everything.

Sincerely,

Johnny Chung
Chairman/CEO
AISI

Thank you!

JC:iw

0119

EXHIBIT 259

JC 608

Ms. WILLIAMS. I can't see it but I'm familiar with the——

Mr. BENNETT. Mr. Dennis is putting it before you with the exhibit book as well as the TV screen. Ultimately, these photographs were sent to Mr. Chung, and just quickly, exhibit 201 is not your direct response to that, but it's the response of Ms. Carol Khare of the Democratic National Committee, who is going to testify before this committee later this afternoon, indicating that photographs were, in fact, forwarded. Ultimately, Mr. Chung got his pictures with the First Lady to your knowledge, correct?

[Exhibit 201 follows:]

04/11/95 00:56 202 863 8174 DNC CHAIRMEN DODD AND FOWLER → AISI NO.535 P01

DEMOCRATIC* NATIONAL *COMMITTEE

Donald L. Fowler
National Chair

Christopher J. Dodd
General Chair

OFFICE OF THE CHAIRMEN

PH 202-863-8121
FAX 202-863-8174

FAX COVER SHEET

DATE:_____ TIME:_____

TO: Johnny Chung

FAX:_____ # OF PAGES (including cover): 1

FROM: Carol Khare

SUBJECT: photo

IF YOU HAVE ANY TROUBLE WITH THIS TRANSMISSION,
PLEASE CALL _____ AT (202) 863-_____

COMMENTS: The White House assures me that you now have the pictures — hurray!! If you don't, give me a call. Have a good trip!

___ PLEASE VERIFY RECEIPT OF THIS DOCUMENT IMMEDIATELY

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. THIS MESSAGE MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS BELOW VIA THE U.S. POSTAL SERVICE. THANK YOU.

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EXHIBIT
201

Ms. WILLIAMS. Yes, the pictures with the First Lady, I didn't send them directly, but I'm sure that our office process worked and he got pictures with the First Lady.

Mr. BENNETT. But ultimately there were questions and problems with respect to the matter of Mr. Chung's photograph with the President and the individuals he'd taken into the Oval Office; weren't there?

Ms. WILLIAMS. There seems to have been, yes.

Mr. BENNETT. What involvement did you have with respect to those problems as to the picture of Mr. Chung with the President and his six guests to the Oval Office?

Ms. WILLIAMS. I saw his letter at my—one of my depositions. So I don't remember seeing this letter but I may have been called by Johnny Chung or Evan Ryan may have told me there were problems with Mr. Chung receiving his pictures from the President and was there anything that I could do to help get his pictures.

Mr. BENNETT. Do you know Ms. Nancy Hernreich?

Ms. WILLIAMS. Yes, I do.

Mr. BENNETT. And who is she?

Ms. WILLIAMS. She is the President's Assistant.

Mr. BENNETT. And she, in fact, will testify this afternoon, and also Ms. Kelly Crawford—who is Ms. Crawford? Do you know Kelly Crawford?

Ms. WILLIAMS. Hillary Crawford?

Mr. BENNETT. Kelly Crawford.

Ms. WILLIAMS. Yes.

Mr. BENNETT. And she at one time worked at the White House?

Ms. WILLIAMS. Yes, she did.

Mr. BENNETT. Did you have any discussions with either of them about the comments they had with the President concerning his concern about the photographs?

Ms. WILLIAMS. No, not that I recall.

Mr. BENNETT. With respect to Ms. Gina Ratliffe, she at one point in time ultimately worked for Mr. Chung; didn't she?

Ms. WILLIAMS. That's correct.

Mr. BENNETT. And at the same time she was working for Mr. Chung she was still volunteering at the White House?

Ms. WILLIAMS. No, I don't believe so.

Mr. BENNETT. At any point in time did Ms. Ratliffe work both for Mr. Chung and at the White House, to your knowledge?

Ms. WILLIAMS. No, not to my knowledge, no.

Mr. BENNETT. Did you arrange for her to get a position with Mr. Chung?

Ms. WILLIAMS. No.

Mr. BENNETT. Ultimately she was employed by him?

Ms. WILLIAMS. Yes, I understand she had taken a job with him.

Mr. BENNETT. Was that after she was employed by the First Lady?

Ms. WILLIAMS. Well, I don't believe she was ever employed by the First Lady. She was an intern and then a volunteer.

Mr. BENNETT. And did she go from being an intern and a volunteer, to your knowledge, to an employee of Mr. Chung?

Ms. WILLIAMS. Go from being an intern?

Mr. BENNETT. Chronologically in terms of what she was doing.

Ms. WILLIAMS. Oh, I do not know if there was a period in between when she left our office and went to work for Mr. Chung or if there was no period in between, I just don't know.

Mr. BENNETT. But your testimony is that she was never volunteering at the White House at the same time she was working and being paid by Mr. Chung?

Ms. WILLIAMS. Not to my knowledge, no.

Mr. BENNETT. Ms. Williams—and I will wind up with this, Mr. Chairman—do you have any personal knowledge either directly speaking with the President or in speaking with other members of the staff at the White House, of President Clinton's concerns when he learned of the release of the photographs of him with Mr. Chung and the delegation from China?

Ms. WILLIAMS. I have no personal knowledge.

Mr. BENNETT. Did you hear of those concerns at the White House?

Ms. WILLIAMS. I knew that there was some concern about the pictures, but I don't know where that concern emanated from, whether it was from the President or someone else.

Mr. BENNETT. Mr. Chairman, it is probably appropriate for me to stop and I will conclude my examination. Thank you very much.

Just one followup question. Ms. Williams, did Mrs. Clinton have knowledge—did Mrs. Clinton have knowledge of Ms. Ryan ultimately going to work for Mr. Chung?

Ms. WILLIAMS. Ms. Ryan? I think you mean Ms. Ratliffe.

Mr. BENNETT. Excuse me, I misspoke. Did you ever speak with Mrs. Clinton about Gina Ratliffe going from being an intern on her staff to going to work with Mr. Chung?

Ms. WILLIAMS. No, there would be no reason. She was an intern, a volunteer.

Mr. BENNETT. Do you have any knowledge whether or not Mrs. Clinton knew that Ms. Ratliffe went from the staff of the First Lady to go to work for Mr. Chung?

Ms. WILLIAMS. No, I have no knowledge if she did.

Mr. BENNETT. I have no further questions, Mr. Chairman, and thank you, Mr. Chairman, for allowing me to exceed my time. Thank you, Ms. Williams.

Mr. BURTON. The gentleman's time has expired. Would the minority like to have us go vote and come back?

Mr. WAXMAN. Mr. Chairman, yes, I think it would be appropriate for us to vote and come back, but I do want to point out that the issue on the House floor, as soon as the vote is completed, will be a matter that affects this committee: the Republican leadership has requested a rules change to allow this committee to have eight subcommittees, which is quite unheard of and in our view a real waste of taxpayers' money. So if the chairman would permit, we ought to give some of us time to make a statement on the floor before we reconvene.

Mr. BURTON. That would be fine with me. The problem is I don't want to impose on Ms. Williams' time unduly. Could we have some of the Members come back and go ahead?

Mr. WAXMAN. I think it wouldn't last more than 5 or 10 minutes for some of us to make our statements.

Mr. BURTON. Why don't we do this. Ms. Williams, would you like to get a sandwich or something while we are down there debating another issue?

Ms. WILLIAMS. No, but I will be OK.

Mr. BURTON. Why don't we plan to return as quickly as possible. The committee will stand in recess until the fall of the gavel.

[Recess.]

Mr. BURTON. The committee will come to order.

Did you have a chance to get something to eat, Ms. Williams, or can I call you Maggie?

Ms. WILLIAMS. You can call me Maggie.

Mr. BURTON. You haven't had lunch?

Ms. WILLIAMS. I am waiting until after this to have dinner.

Mr. BURTON. You might be very hungry.

Ms. WILLIAMS. I'm sure.

Mr. BURTON. Mr. Waxman, you are recognized for 30 minutes.

Mr. WAXMAN. Ms. Williams, I want to thank you for being here. I think it has been an extraordinary measure of cooperation for you to come. And as you can tell from my opening remarks, I think Johnny Chung's experience is a classic example of why we need campaign finance reform. He gave a lot of money to the DNC, about $400,000, and he got a lot of access to the White House, over 50 visits. His story paints a pretty depressing picture, in my view. It is hard to see how any member of the public could pay attention to the Johnny Chung story and not be discouraged about the health of our political system. To put it simply, his story presents the appearance that campaign contributions could result in remarkable access to the White House.

Now, I understand you may have a different interpretation than I do, and I want to ask you about this. Johnny Chung visited the White House 50 times. He was allowed to bring his business associates into the White House on more than one occasion. He went to several White House Christmas parties. He had numerous photos taken with the President and the First Lady. He attended a radio address. He got to eat at the White House Mess on several occasions. He even got appointed to the U.S. delegation to a Commerce Department trade forum.

Ms. Williams, how do you explain how someone like Johnny Chung got this extraordinary access?

Ms. WILLIAMS. Congressman, as I said at the beginning of this hearing, I would talk to you about what it is that I know. I certainly know how he got a picture with Mrs. Clinton, which I talked to you about. I certainly know how he got to go into the White House lunchroom, that he ate on my account. I am clear about that. I did not know about the trade commission. I did not know about several other instances.

Mr. WAXMAN. But about those issues that you do know about.

Ms. WILLIAMS. Right.

Mr. WAXMAN. How is it that this fellow got such good treatment?

Ms. WILLIAMS. Well, I'm going to say two things to you. I am not naive in terms of treatment of donors, but I will say another thing to you which I don't think gives the American people a lot of hope, because one of the things that makes me exceedingly sad is that people watch these hearings, and they think that as between the

U.S. Congress and the White House there is not one good soul among us.

And one of the things that I want to say is that there were a lot of people working at the White House, not only to ensure that people like Johnny Chung, who was a donor and a supporter of the Clintons, was able to come in, but that millions of Americans were able to come in.

And I happen to be in an office in a situation working for a woman who's graciousness, I think, is probably typified by the fact that when she was called a horrible name on national television by the mother of the Speaker of the House, what she decided to do was to invite her to tea. Now that sounds a little crazy, a little offbeat, but that was a model of graciousness that we had in the White House. And what I am telling you today, although I do know that certain people in the White House, outside of the White House, pay special attention to people who give the money, there are also people in the White House who pay special attention to people just because they are people. And if we could give more access to the public to the White House, we would do it.

There are security concerns, for one. But quite frankly, in the time that I have been at the White House, nearly a million and a half people go through the doors of the White House. In addition to the regular tour, there is also a special tour for people who need something more. Even the Congress has a right to have constituents that they choose who might be donors, who might just be friends and families, to have a special tour of the White House. So we have tried very hard to give access to a lot of people.

Mr. WAXMAN. I guess the only point I am making and I don't dispute what you are saying because I know the First Lady is a very gracious person and this White House has tried to be as open as possible. But it's hard for me to believe that ordinary people would get the kind of treatment that a Johnny Chung got. We have a campaign finance system where good people in public office try to think about how much an individual may contribute or how much they have already contributed when they think about giving scarce resources—like their time and access—to those contributors.

I'd like to focus for a moment on Mr. Chung's visits. Was there a typical visit? What did Mr. Chung do on a typical visit, if there was one?

Ms. WILLIAMS. Well, I wasn't always present when he would make a typical visit to the White House. And I really don't know—according to the records, I'm told that he came to the First Lady's office, was cleared in by the First Lady's office, which is to say he was outside of the doors and we made arrangements for him to come in about 20 or 21 times. Somewhere around that number.

And that the other times that he was cleared into the White House, he was cleared in by another office, none of which at the time I knew about, but I did know from the people who worked at our reception office that he would drop by our office. And typically what he would do would be to use the phone, tell people his story of meeting with Mrs. Clinton, and what it has done for his life, and he would mostly sit and chat and wait to see if I would come out of the office so he could talk to me or talk to anyone else. That was his typical visit.

Mr. WAXMAN. Did he meet with Mrs. Clinton often?

Ms. WILLIAMS. Meet with Mrs. Clinton? No, actually I think he only saw her in receiving lines at these large events. As I said, the one picture that I know that I arranged for was a picture. He never in any of his visits asked for a meeting with Mrs. Clinton, a substantive meeting with Mrs. Clinton. He never talked to me about policy. He never talked to me about his business concerns, so I did not have a sense that what he was doing in our office was business. And, in fact, there were only two occasions that I can remember him ever being with other people when I saw him.

One, he had a group of people and he introduced them to me. They did not speak English, and they all bowed to me, and I bowed back to them. And so that particular group of people stands out in my mind.

On another occasion, I believe that he brought two or three people who worked for him. Other than that, I have no knowledge of who else he brought into the White House.

Mr. WAXMAN. To your knowledge, did he ever comment, advocating any official business, advocating a position, policy position or asking for any official business with the White House?

Ms. WILLIAMS. Never—not to my knowledge, no.

Mr. WAXMAN. Now, in March 1995, Mr. Chung met with you and in the First Lady's office and gave you a $50,000 check for the DNC. The key question here is whether you solicited this contribution. Did you?

Ms. WILLIAMS. No, I did not, as I said in my testimony, on many occasions he had asked to give money to Mrs. Clinton personally. He wanted to help her personally, he would say. I want to give to her personally, and I said you should give to the DNC or give to the campaign or any of the other entities that were available.

Mr. WAXMAN. Did you or anyone in your office ever solicit any contribution from him, ask him to give a dollar amount?

Ms. WILLIAMS. No, not to my knowledge, not at all.

Mr. WAXMAN. What happened when Mr. Chung tried to give you this check?

Ms. WILLIAMS. Well, it was only, as I recall, the whole incident—incident, a few minutes, if not a few seconds. I remember him being much more excited than normal and that, in fact, he had in his hand something and kept saying, "You take; you take." And I was saying, Johnny, you can't give, once again as I recall, you can't give anything to Mrs. Clinton because he said, "You take, you take, it's DNC. I give to the DNC through you. I give." And he was—once again, not unkind and not rude, but certainly in my face a little bit.

Mr. WAXMAN. So he insisted on giving it. Was it an envelope or a check?

Ms. WILLIAMS. I really don't recall. I mean——

Mr. WAXMAN. Did you know how much money the check was for?

Ms. WILLIAMS. No, I didn't even—I mean, the thing that is most memorable about that event for me is not even the check itself, it's kind of his behavior at that time.

Mr. WAXMAN. After he gave you the check what did you do with it?

Ms. WILLIAMS. I believe I threw it in my outbox.

Mr. WAXMAN. And then what happened?

Ms. WILLIAMS. Well, other checks come through the mail to the First Lady's office. And generally, if I get them, I put them in my outbox where a volunteer or my assistant will direct them to the appropriate entity.

Mr. WAXMAN. So it was then put in your outbox to mail to the DNC.

Ms. WILLIAMS. Yeah, to send it wherever it belongs.

Mr. WAXMAN. Mr. Bennett has already mentioned a February 27, 1995, letter that Mr. Chung wrote to Richard Sullivan of the DNC. The document is Bates Stamped DNC 3233326. I think you have that letter.

Mr. DENNIS. What is the exhibit number, Congressman Waxman?

Mr. WAXMAN. Exhibit 171.

Ms. WILLIAMS. The letter to Richard Sullivan?

Mr. WAXMAN. Yes, this letter describes Mr. Chung's plans for bringing a Chinese delegation to Washington. Did Mr. Chung also write to you about this visit?

Ms. WILLIAMS. No, he did not.

Mr. WAXMAN. Did you have any knowledge about his agenda, which included meetings with the President, tours of the White House, before he met with him in March?

Ms. WILLIAMS. No.

Mr. WAXMAN. I want to turn to another issue that has received a lot of attention. Mr. Chung and his delegation attended one of the President's radio addresses during the March visit. Are the invitations for these broadcasts coordinated by one person in the President's office?

Ms. WILLIAMS. I really couldn't tell you if they were coordinated by one person.

Mr. WAXMAN. OK. Did you assist Mr. Chung in any way in obtaining an invitation to that March 11, 1995, radio address and did you instruct anyone on your staff to do so?

Ms. WILLIAMS. No, it's not my recollection I helped him with the picture and——

Mr. WAXMAN. The picture is afterwards?

Ms. WILLIAMS. No, I helped him with a picture for Mrs. Clinton, and——

Mr. WAXMAN. But not on the radio?

Ms. WILLIAMS. No not on the radio.

Mr. WAXMAN. In this context, did you mention to anyone in the President's office or the DNC that Mr. Chung had made a contribution to the DNC?

Ms. WILLIAMS. No, I did not.

Mr. WAXMAN. Did you do anything, no matter how insignificant, to help with this matter?

Ms. WILLIAMS. No, not that I recall, nothing.

Mr. WAXMAN. Let me ask you a more general question. Did you ever help anyone else obtain an invitation to the President's radio address?

Ms. WILLIAMS. One, person, yes.

Mr. WAXMAN. And who was that?

Ms. WILLIAMS. A person by the name of Ceandra Scott who was an assistant to the chairman of the DNC. Her parents—I don't remember if it was her parents or her grandparents were in town and she really wanted them to go to the radio address.

Mr. WAXMAN. I want to make sure I understand your testimony on two key points. First, you never solicited a contribution from Mr. Chung, and two, you had no role in assisting with his attendance at the President's radio address; is that correct?

Ms. WILLIAMS. That's correct.

Mr. WAXMAN. Mr. Chairman, what confuses me about today's hearing is that Ms. Williams had to travel all the way from Europe to be here today. She was already deposed by us for over 10 hours; by the Senate for 8 hours. By the end of the day today it will be a long full day, and on the key points she has testified repeatedly under oath that she didn't solicit Mr. Chung's contribution.

If she didn't solicit the contribution, there is no illegality. Then the question becomes, I suppose, whether Mr. Chung's access creates an appearance of impropriety. That is a much larger issue that really goes to the heart of our campaign finance system, and it seems to me that if we were going to focus on that, we should be at least willing to look at some of the big fish.

Ms. Williams, are you familiar with a man by the name of Duane Andreas of the Archer Daniels Midland Co.?

Ms. WILLIAMS. I've certainly heard his name.

Mr. WAXMAN. I ask because I find it odd that we are holding a hearing on money and access without any mention of Mr. Andreas and his company. Here is an individual whose generosity to both parties, Republicans and Democrats, is legendary. As you may know, he was a supporter of President Clinton, but he was also a contributor to Senator Dole.

In fact, I have a series of photos starting with Mr. Andreas and President Truman. Then we have Mr. Andreas with President Kennedy and we also have Mr. Andreas with President Reagan and that photo is now being shown.

Mr. Andreas and his company gave over $450,000 to Senator Dole; $70,000 to Speaker Gingrich and his PAC and $100,000 to the DNC at one fund-raiser alone. He's given to almost every major Presidential candidate since Richard Nixon. At the same time, his company has received billions of dollars in Federal subsidies through the Ethanol Subsidy Program, and tens of millions of dollars in government contracts.

Now, in the case of Mr. Chung, it doesn't seem that he was interested in any Federal subsidies or policies; is that right as far as you know, Ms. Williams?

[The photographs referred to follow:]

A high-level agricultural conference in 1960. Left to right: Hubert Humphrey, Orville Freeman, Dwayne O. Andreas, John F. Kennedy, and M. W. Thatcher of the Farmers Union Grain Terminal Association.

"I was just saying to the president that there'd been no negative reaction when I told Gorbachev to tear down the Berlin wall," Andreas said, "when a photographer popped out of an antechamber and snapped us."

Ms. WILLIAMS. To my knowledge, he never discussed it with me.

Mr. WAXMAN. And as far as we know he was never awarded a Government contract; is that right?

Ms. WILLIAMS. To my knowledge.

Mr. WAXMAN. Mr. Chairman, since we are going to spend our time looking at access and contributions, I believe ADM deserves at least as much attention as we are giving to Johnny Chung. And there are a lot of others, too. And if we are going to get into this issue, let's get into this issue, because it goes to the very heart of our campaign finance system: the access that people get to Democrats and Republicans, Presidential candidates and congressional candidates; the kinds of quid pro quos that they get, if not in the precise term of a bribe, nevertheless one that the American people look at as corrupting. I think that's what our campaign finance system does. It corrupts. It makes people think about the money. And then think about what they can do to those who can give the money.

We still have time left, and I want to yield at this time 10 minutes to my colleague from California, Mr. Lantos.

Mr. LANTOS. I thank the gentleman for yielding. I want to welcome Ms. Williams. You have been a very distinguished public servant. You have a record in the private sector of devoting your life to children's issues and I want to welcome you to our committee.

I want to apologize to you for having been dragged back here from Paris and I want to ask you if you have any idea what your legal costs have been thus far? Give us just a ballpark figure.

Ms. WILLIAMS. Not including today, $350,000.

Mr. LANTOS. Well, I suspect that's a pretty awesome amount to most of us in this room, and this all in this game which I have labeled "Trivial Pursuit," so today we are engaged in, I don't know what chapter of this drama.

I want to spend a few minutes on Mr. Chung as a political hustler of a very bipartisan character. A great deal of attention was paid early on to a picture he had with the First Lady. I would like to draw attention to various other pictures that feature Mr. Chung.

Let's first look at the one with Mr. Chung and the Speaker of the House, Newt Gingrich. They seem to be engaged in a rather serious and substantive dialog. I cannot tell the topic by just looking at the picture, but I don't think they are sharing jokes or engaging in trivial discussions. Both of them look very serious.

Now, when we move over to Mr. Chung and the former Republican Presidential candidate—well, we are now looking at Mr. Chung and Mr. Gingrich. If we could take now Mr. Chung and Senator Dole. Mr. Chung and Senator Dole have a more sort of cordial appearance. They may have been discussing athletic events or perhaps the meal that they may or may not have shared.

In any event there is a degree of physical proximity between the two of them which indicates a modicum of intimacy.

Now, if we may move on to a lady who recently was in the news again because she, again, won the gubernatorial contest in New Jersey, Governor Christine Whitman. She seems delighted to be meeting Johnny Chung, and Johnny Chung is equally pleased in meeting her.

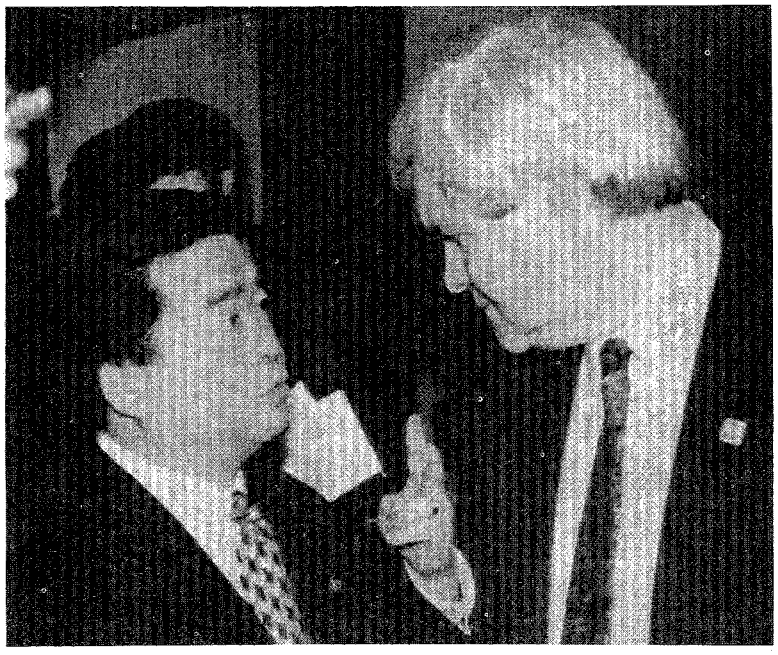
She, of course, is not the only distinguished Republican Governor that Johnny Chung seems to be cordial with. If we look at the State of Virginia, we find Governor George Allen literally beaming at the chance of spending a few leisurely, relaxed and I suspect warm moments with Mr. Chung.

Mr. Chung, it seems, was not partial to the East Coast, so let me take you to the heart of the country with Governor Jim Edgar of Illinois who is smiling and pleased. In this case it's Mr. Chung who seems to be overly elated at the opportunity of getting together.

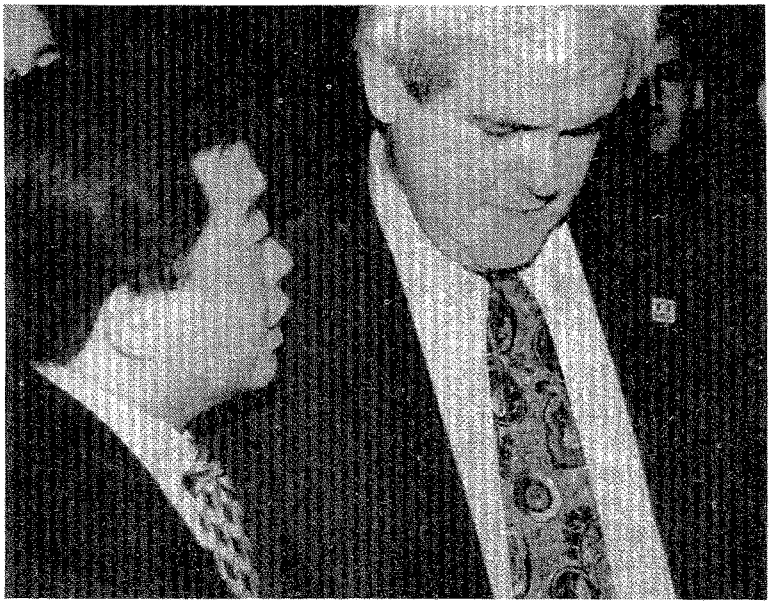
And since I think, in all fairness, the Pacific Coast should not be discriminated against. Let me take you to the State I have the privilege of representing, the State of California, where former Republican Presidential candidate and our current Governor, Pete Wilson, is serious, but very positive in his exchange with Mr. Chung.

These pictures, of course, could be concocted, this series of pictures, ad nauseam and ad infinitum because if you are a resourceful and aggressive political hustler, as obviously this gentleman is, then sooner or later you get a picture with somebody.

[The photographs referred to follow:]



U.S. Speaker of the House
Mr. Newt Gingrich

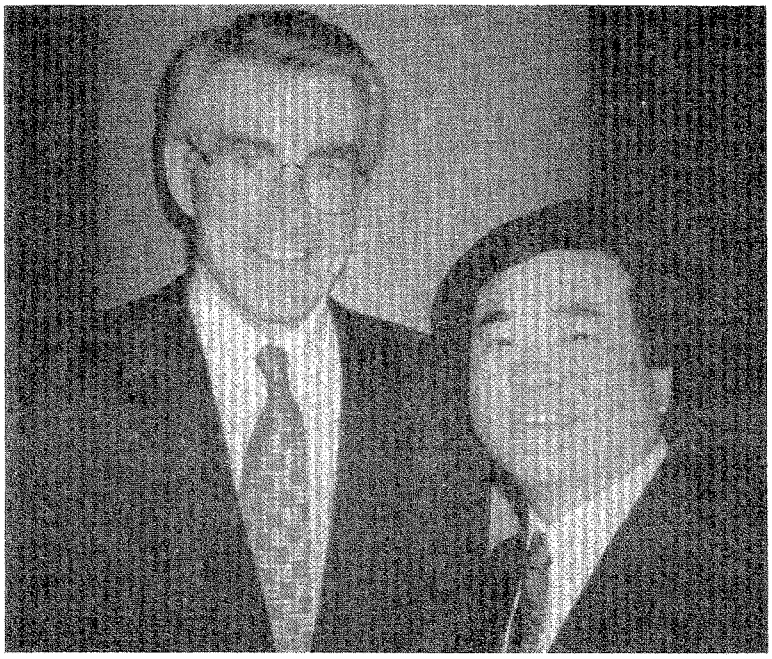


U.S. Speaker of the House
Mr. Newt Gingrich

Majority Leader
Senator Bob Dole

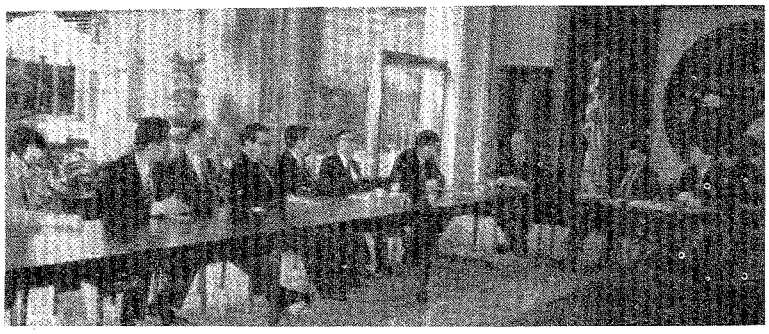
State of New Jersey
Governor Christine T. Whitman

State of Virginia
Governor George F. Allen



State of Illinois
Governor Jim Edgar

Governor Pete Wilson
State of California



The China Delegation at the California State Governor's Office

Mr. LANTOS. I would like to read a letter which in terms of warmth and intimacy dramatically exceeds the letter Mrs. Clinton wrote Mr. Chung. This was written by the Governor of the State of California, Pete Wilson, and this is what it says:

"Dear Mr. Chung: It is my understanding that you have been nominated as Entrepreneur of the Year," a title surely deserved. "Congratulations! It is a well-deserved recognition.

"My Communications and Press officers inform me that you and your team have performed in an outstanding manner. Your good work, in turn, has enabled my office to serve the people of California effectively and efficiently."

Now, I don't quite understand this, so let me read it again, because I have difficulty seeing how Mr. Chung's entrepreneurial excellence had an impact on the gubernatorial office in California, but there may be things here I don't know about. So let me read Governor Pete Wilson's sentence again. He's talking to Mr. Chung and says: "Your good work in turn has enabled my office to serve the people of California effectively and efficiently, especially during California's recent disasters."

[The letter referred to follows:]

GOVERNOR'S OFFICE

April 6, 1994

Mr. Johnny Chung
Chairman & CEO
Automated Intelligent Systems, Inc.
2771 Plaza del Amo, Suite 809
Torrance, California 90503

Dear Mr. Chung:

It is my understanding that you have been nominated as Entrepreneur of the Year. Congratulations! It is a well-deserved recognition.

My Communications and Press offices inform me that you and your team have performed in an outstanding manner. Your good work, in turn, has enabled my office to serve the people of California effectively and efficiently -- especially during California's recent disasters.

Again, you have my appreciation for a job well done!

Sincerely,

Pete Wilson

PETE WILSON

GOVERNOR PETE WILSON • SACRAMENTO, CALIFORNIA 95814 • (916) 445-2841

Mr. LANTOS. If you read this carefully, it seems that all this tremendous Statewide effort in California during the various tragedies that befell the State a few years ago, and were handled so effectively, may have been the result of the entrepreneurial brilliance of Johnny Chung. To conclude Pete Wilson's letter, "Again, you have my appreciation for a job well done!"

Now, I suspect that what we are dealing with, as the distinguished ranking member pointed out, is the seamy side and the occasionally hilarious side of the political fund-raising system that we on this side of the aisle are anxious and eager to reform and correct. But since we need to look at more than episodic evidence, let me indicate, still sticking to the question of photo opportunities, the kinds of photo opportunities that the Republican National Committee has offered its generous contributors.

Photo opportunities: The 1997 Republican National Committee annual gala offered those who raised $250,000 a photo opportunity with Senate Majority Leader Trent Lott and Speaker of the House Newt Gingrich on May 13, 1997. In 1995, the Republican Senate/House dinner invitation offered those who donated or raised $100,000, a quote, "a photo opportunity with Senate Majority Leader Bob Dole, House Majority Leader Dick Armey and Speaker of the House Newt Gingrich." A 1992 President's dinner, this involved President Bush, promised those who raised $92,000, you get the cute connection. It's 1992, oh, you have to give $92,000, $92,000 you get a photo opportunity with President Bush.

Season ticket holders, now if you thought that season ticket holders is a sports expression, it isn't. Season ticket holders are people in the Republican National Committee's lexicon. They are contributors who gave $250,000 a year. They were invited to attend private receptions with Presidential candidates, private meetings with congressional committee chairmen, lunch with Newt Gingrich and Bob Dole, breakfast with the Republican Presidential nominee at the Republican National Convention. Season ticket holders also are promised a GOP staff person on call to answer questions and provide assistance.

If you are not a season ticket holder, but a lower level contributor, $175,000 over a 4-year period, you're invited to attend a retreat with Presidential candidates, participate in international business missions, and national and regional meetings with key Republican leaders.

Now, if you are just an Eagle, an Eagle is a person who gives $15,000 a year, you are invited to attend a White House dinner, meeting in Washington with party leaders and an international business mission and so on.

Now, I find Johnny Chung's activities nauseating and revolting and very likely illegal. And I hope that the full weight of the law will be brought to bear on any activities on his part or on anybody else's part where we are dealing with violations of law.

But the fact that in the process of his hustling, during the course of which he got hold of the Speaker of the House of Representatives in an intimate setting, the Republican Presidential candidate, former Senator Dole, a man for whom I have very high regard, in a close setting, these fine Republican Governors covering the national landscape from California to New Jersey, from Virginia to Il-

linois, do not make it so unique that in his reckless and mindless pursuit of political leaders, he also was interested in meeting with some people in the White House.

I find the performance unattractive, unacceptable, nauseating, but totally bipartisan. And the hypocritical attempt on the part of some on the other side to portray Mr. Johnny Chung as perpetrating these photo outrages with Democrats only, the facts simply will not bear out. I yield back the time to the ranking member.

Mr. WAXMAN. Thank you for yielding back to me, Mr. Kanjorski. Do you want to ask questions of Ms. Williams?

Mr. KANJORSKI. Thank you very much, Mr. Chairman.

Mr. WAXMAN. Mr. Kanjorski, it looks like I'm not yielding you any time. Why don't we wait until the next round. We yield back the balance of our time.

Let me ask a question. You said that Mr. Chung would tell you how his meeting with Mrs. Clinton had changed his life. Did he ever tell you about his meetings with these Republican Governors and whether that changed his life as well?

Ms. WILLIAMS. No, he did not.

Mr. WAXMAN. I yield back the balance of my time.

Mr. BURTON. The gentleman yields back. Mrs. Morella.

Mrs. MORELLA. Thank you, Mr. Chairman. Ms. Williams, you didn't see this as any part of your job description, did you? I just wanted to indicate my appreciation for your being here and your willingness to answer questions. I've always valued working with you in small ways in the past.

Ms. WILLIAMS. Thank you.

Mrs. MORELLA. There are a couple of questions I have because they mystify me and perhaps you can shed some light on this. I have been looking at the papers I have here before me, and there is one here that is exhibit 255—155? 155, maybe we could put it on the screen. At any rate, it is a memorandum to you, Ms. Williams, from Gary Walters, and it's bills for collection. In that memorandum which you received from Gary Walters, at the bottom it indicates, remaining to be paid by the DNC for fiscal year 1994, $135,345.25.

[Note.—Exhibit 255 can be found on pp. 43 to 46.]

Mrs. MORELLA. Now, in the Tom Brokaw tape, Mr. Chung specifically said that he was solicited by Evan Ryan to make a contribution to cover that particular debt. Do you know anything about that?

Ms. WILLIAMS. No, I do not.

Mrs. MORELLA. The thing that puzzles me is that how do you fathom that he knew about this debt for holiday events if somebody didn't tell him? And who do you think might have told him? Where do you think the information might have come from?

Ms. WILLIAMS. Congresswoman, as I have been asked that question earlier, and my first reaction would be not to speculate where Mr. Chung had heard that. I will say to you that this document, or the fact that the DNC, along with other organizations, had not paid debts to the White House for events held there was really not a state secret. People at the DNC knew this, people in my office knew this. I could simply say to you that this was not a well kept

or hidden state of issues. But I do not know from whom, if in fact he got the information, whom he got it from.

Mrs. MORELLA. You can understand why it would be puzzling because it says specific in terms of the breakdown with regard to the events that had been held. So somebody got the word out. You don't know who did? And you say it may have been very well-known.

Ms. WILLIAMS. I think that it was—I think that it was generally known, because at the DNC and also at the White House, that there were bills that organizations had not paid, including the DNC, yes.

Mrs. MORELLA. Incidentally, that is exhibit 255; right.

I had another question in looking over some of the photographs and the letters and this has to do with the fact that evidently Mr. Chung must have been using these photographs and letters for his own business benefits. One witness that was interviewed by the committee said that Mr. Chung convinced him to invest over $900,000 in his company, AISI, and he said he was finally forced to sue Mr. Chung when he discovered that AISI was not capable of even providing the services that Mr. Chung said that it could.

And I just wondered, were you aware that Mr. Chung was utilizing these letters, photographs, for his personal aggrandizement for his business, it was fraud?

Ms. WILLIAMS. No, I had no idea.

Mrs. MORELLA. It seems as though at some point there was a cease and desist that was sent from the White House, and so evidently somebody caught on to the fact that this was inappropriately used. Are you aware of that?

Ms. WILLIAMS. No, I'm not—no, I'm not specifically aware of that.

Mrs. MORELLA. I have another kind of question, and that has to do with the young intern, Gina Ratliffe.

Ms. WILLIAMS. Uh-huh.

Mrs. MORELLA. And trying to follow the line of her involvement as an intern in the First Lady's office. In her deposition, Ms. Ratliffe said that she started to work as a volunteer in the First Lady's office after she returned from her trip to China with Johnny Chung. And I just wondered, did you know that when she was volunteering in the First Lady's office that she was employed by Mr. Chung?

Ms. WILLIAMS. No, I have to tell you, I really didn't focus very much on the comings and goings of the interns and the volunteers.

Mrs. MORELLA. If you had known, what kind of advice would you have given her?

Ms. WILLIAMS. With respect to?

Mrs. MORELLA. Whether she should sever her internship or sever her work with Mr. Chung. I mean——

Ms. WILLIAMS. I guess, Congresswoman, I'm not quite clear. She was working——

Mrs. MORELLA. She was employed by Mr. Chung while she was working at the White House as an intern. I just wondered, had you known that this was going on, would you have said to her, I really don't think you should be here or you shouldn't be working for Mr. Chung? I mean, I probably would have said something to a young woman who was an intern had I found out?

Ms. WILLIAMS. Well, it's very hard for me to speculate or give advice in retrospect. I prefer not to do that because there are quite a few things that I have recently learned with respect to Mr. Chung through news media accounts and since we haven't heard from him, I'm reticent to simply receive those as given until we do. We have—so, I mean, I don't know what specific advice I would give to her about not volunteering in the First Lady's office because she was working with Mr. Chung. I just don't quite know what advice that would be.

Mrs. MORELLA. OK.

Mr. BURTON. The gentlewoman's time has expired.

Mrs. MORELLA. Yes, I thank you, Mr. Chairman. I thank you, Ms. Williams. These are just riddles within enigmas that were cryptic. Thank you.

Mr. BURTON. Mr. Kanjorski.

Mr. KANJORSKI. Thank you very much, Mr. Chairman. Ms. Williams, what was the policy of the Clinton administration in regard to increasing access to the White House?

Ms. WILLIAMS. Well, I certainly know that both the President and the First Lady were always looking for opportunities to increase the number of people who got to come to the White House. In fact it was—it is during the term of Mrs. Clinton's time as First Lady that she started talking about the White House as the people's house and asked that several things be worked on and done, including having special days like the veterans of foreign affairs days where veterans could come into the White House, special day for scouts and girl guides. The idea was to get as many people into the White House as possible.

Mr. KANJORSKI. Isn't it true that you had a policy there to encourage average Americans to come down and volunteer: opening up Christmas cards to the President, answering letters to the President and the First Lady?

Ms. WILLIAMS. Oh, the White House could not survive without the help of its volunteers and we certainly encouraged people to do that. Young people and quite a few older people.

Mr. KANJORSKI. I remember particularly being down in the Executive Office Building myself when two busloads of senior citizens from Carbon County, PA, were just tickled pink to have an opportunity to be invited into the White House to volunteer their time to open up Christmas cards and letters to the President. And that wasn't particular to Carbon County, PA, was it?

Ms. WILLIAMS. No, in fact a number of things we have done. We have tried to, at Christmas to go out and get people from the States to come in and participate at Christmas, whether it be their choirs or in-house decorating. Yes, there has been a real special effort made that, you know, I'm extremely proud of in trying to get people into the White House to see it, because it's incredible to be there.

Mr. KANJORSKI. Ms. Williams, I go home to my district every weekend and I talk to constituents. When they describe their opportunity to visit the White House, they light up and just the essence of being close to the President and the First Lady, even if they never see them. And isn't it true, 95 percent of the people that pass through the White House or come there never really get an

opportunity to see the President, but just the association that the President is there and their particular President is there gives them great enthusiasm?

Ms. WILLIAMS. Oh, certainly. And I would say that while you're probably right that 95 percent of them never see the President or First Lady, Mrs. Clinton has made it a habit from time to time to actually walk through the visitors' lines and to see people who would not ordinarily have a chance to see her. So, yes, access has been important to us.

Mr. KANJORSKI. And although a million and a half people a year do come to the White House, even if you calculated that over the 5 years of this Presidency, that's about 7.5 million. That would leave about 262.5 million people in the United States that in the last 5 years didn't get an opportunity to go to the White House, isn't that right?

Ms. WILLIAMS. That is true, but soon the White House will be available on CD–ROM.

Mr. KANJORSKI. But what I wanted to point out when we say the White House, it is really the White House compound we are talking about.

Ms. WILLIAMS. Oh, yes.

Mr. KANJORSKI. And most people don't realize that what they see as the White House is a very small portion of the President's office and residence of the White House. But alongside and off on the West side of the White House is the Old Executive Office Building that sort of looks like a French architecture—well, I've never been too fond of it myself. It lacks air conditioning, seems to be inefficient and was probably planned by some frustrated architect. But anyway, that is where most of the operations of the White House occur, in that Old Executive Office Building; isn't that correct?

Ms. WILLIAMS. Yes, in fact that's where the First Lady's staff is situated in the Old Executive Office Building.

Mr. KANJORSKI. That's where your office was. Isn't it true that the First Lady was also occupying a working office in or near the West Wing?

Ms. WILLIAMS. That's true. In the West Wing in fact.

Mr. KANJORSKI. So if I dropped by your office, if I were informed at all, I would have to know that the likelihood is that the First Lady would be there on very, very few occasions, but that was a working office.

Ms. WILLIAMS. That's correct.

Mr. KANJORSKI. So Johnny Chung taking this opportunity to come by your office would have to be either naive or he wasn't coming there with the anticipation of seeing the First Lady because she is hardly ever there; is that correct?

Ms. WILLIAMS. Rarely is she there, and he never asked to see her.

Mr. KANJORSKI. The only other thing I would to straighten out, I have heard a lot of postulation on the other side here about dastardly campaign contributions. Now I'm going to be a bit of a confessor, I don't think there is a member on this committee, in the House of Representatives, or in the U.S. Senate who hasn't been discombobulated or embarrassed when a supporter, friend, or associate of theirs either walks into their official office or sees them at

a function and wants to press their hand and hand them an envelope, and usually with a political contribution involved. And so often in my career, because of the FEC regulations, the contribution is in cash and you have to end up going to your lawyer, sending letters and trying to straighten out the whole problem, but it is always the case that you mentioned in your testimony. How do you treat these people? Do you turn on them and suggest that they are being criminal? Do you ratchet the envelope back in their hands and say don't ever come here again? But it is really a sort of sensitivity that you address this and you try and handle it in a modulated way, not to offend them, and in the other way comport with the regulations and the laws regarding campaign contributions.

Is that what you describe in your testimony today when you were faced with this suddenness and the rush of Mr. Chung wanting to personally pass that envelope to you and knowing full well that it would take an awful lot of time to explain to him the convoluted rules and regulations of campaign financing and conduits and everything else, but instead you just took it, passed it on unopened, unseen and really had little significance, but it did embarrass you; is that correct?

Ms. WILLIAMS. Slightly, Congressman. Embarrassed myself and embarrassed for him.

Mr. BURTON. The gentleman's time has expired.

I'd like to, before I yield to my colleague, Mr. Cox, I'd like to take a couple of minutes. I have not yet had 5 minutes, so I think it's important to maybe explain a little bit of why we are here.

Mr. Lantos pointed out a number of public officials who have appeared with Mr. Chung. And we agree that that took place. But one of the major functions and focuses of our investigation is the illegal foreign contributions that came into the United States.

Mr. LANTOS. The light is not on.

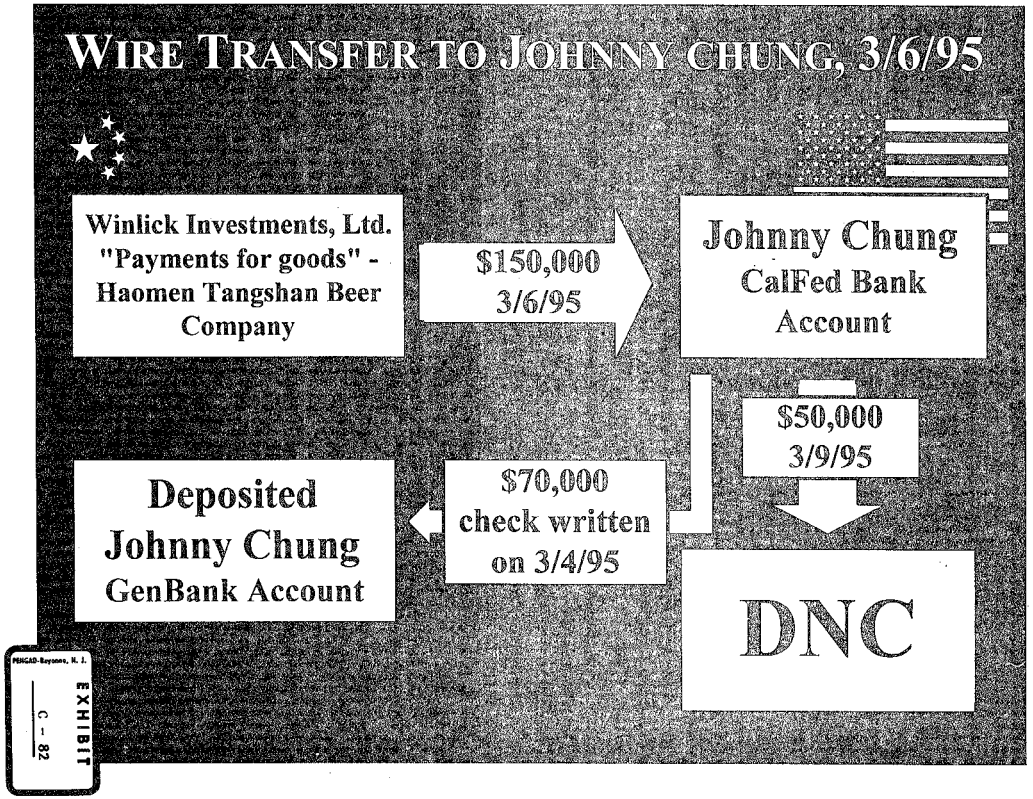
Mr. BURTON. Would you turn the light on for me, please, thank you.

One of the main focuses of the investigation is to find out if illegal foreign contributions were coming into the United States through conduits into the American political process, whether it's Republican or Democrat. Now, we know that on March 6, 1995—and Ms. Williams, according to her testimony, has no knowledge of this, so we are not making any kind of allegation about that. But there was $150,000 that came from the Bank of China in Beijing, China, on March 6th, to Johnny Chung at the CalFed Bank. $150,000 came from the Bank of China in Beijing on March 6th. Now, we know that 3 days later on March 9th, he gave a check to Ms. Williams for $50,000.

Now, at the time he got the $150,000 from the Bank of China in Beijing, he had a negative bank account. He didn't have any money. So it's logical to assume that the $150,000 he got from the Bank of Beijing—Bank of China in Beijing, China was money that he gave to Ms. Williams which ultimately found its way to the DNC. That doesn't mean that Ms. Williams did anything wrong. But the fact is she was a recipient, probably, of illegal foreign contributions.

Now, the reason I bring that up, and then there were $70,000 that was subsequently deposited to the Johnny Chung general bank account on March 4th. But the fact of the matter is there is a very strong possibility, and you can see the chart on the monitor, that foreign money was laundered and was given to the DNC.

[Exhibit C-82 follows:]



PENGAD-Bayonne, N. J.
EXHIBIT
C - 82

Mr. BURTON. That's what we are all about. We are trying to find out about illegal foreign contributions that found its way into the Democrat National Committee and, if it occurred, into the Republican National Committee. That's what this is all about.

These pictures of the people that Johnny Chung met, he may have met me for all I know. These pictures don't really mean a lot, other than they show that he was a person who had the ability to have access to a number of people. But what we are really all about here, at least what I would like us to be about, is the laundering of foreign money into the election process in this country, and whether or not Mr. Chung or anybody else tried to get some concessions in the area of foreign policy or business concessions or anything else in exchange for that money and whether or not foreign governments or foreign entities were getting the benefits of these contributions in the form of concessions to a country or to a foreign business. That's what we are all about, and that's why I wanted to take my time to respond.

With that, I apologize, I will yield the remainder of my time he would like, to Mr. Cox, and then he can have his own time in the next go-round.

Mr. COX. I thank the chairman. I will just use the balance of the chairman's time and take my own time later to pursue the chairman's line of questioning.

The thank you note that was sent from the DNC to Johnny Chung on July 24, 1995, that came from Don Fowler said to Johnny Chung, I enjoyed meeting with your friend, who is the wife of the Chief of Staff of the Chinese People's Liberation Army. The people that came into the White House with Johnny Chung were all, for the most part, communist Chinese officials. The China Petrochemical Corp., COSCO, CITIC, the firm headed by the arms dealer Wang Jun, who himself was at a White House coffee. CITIC, of course is directly controlled by the State Council, the People's Republic of China. Did you talk to the National Security Council about this group's visit into the White House at any time before the visit took place?

Ms. WILLIAMS. No, I actually—if Mr. Chung—once Mr. Chung—once it was agreed that Mr. Chung, could, one, have a photo with Mrs. Clinton or go to the Mess, it was simply a matter of clearing in whoever he was bringing with him. I was——

Mr. COX. Was this your decision?

Ms. WILLIAMS. Pardon?

Mr. COX. Was this your decision?

Ms. WILLIAMS. No, it was pretty much——

Mr. COX. Who made the decision to let the people come in?

Ms. WILLIAMS. The White House security people. What typically happens is if Mr. Chung was going to come and take a picture—and I'm not even sure at that point in time that I knew that Mr. Chung was bringing in a group of people to have a picture taken with Mrs. Clinton. I was OKing a picture——

Mr. COX. But I have a document here, exhibit 187, which is a name list of the delegation which was in your possession prior to the radio address.

[Exhibit 187 follows:]

3/13 cc: Nancy Soderberg
Someone fro
DWC asked
to let Nancy k
Robin Bell

Name List of Delegation

1.) Hongye Zheng 08-18-29
Chairman, China Council for the Promotion of International Trade (CCPIT)
Chairman, China Chamber of International Commerce (CCOIC)

2.) [redacted] YAN SANZHONG 10-26-41
President, China Petro-Chemical Corporation

3.) Jiohun Hueng 01-17-32
Vice President, China International Trust and Invesiment Corporation

4.) Renzhong Wang 05-19-32
Vice Chairman & President, Shanghai AJ Shareholding Corporation

5.) James J. Sun 10-28-62
Young Entrepreneur of Xinjiang, self made multi-millionaire, Urumqi Taihe Industry Co.

Entourage

1.) Jianiong Yu 02-22-65
Chief, American & Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

~~2.) Buxin Tang~~
~~Secretary to Mr. Huaren Shang~~

~~3.) Jie Tang~~
~~Interpreter, SINOPEC~~

118 20
Willis Gaston

AISI Representatives

1.) Johnny Chung - Chairman/CEO 06-09-54

~~2.) Art Liang - Managing Director/Executive V.P.~~

Before photo are
fine on all need
to know if we
should get
rid them -
NH

EXHIBIT
187

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Ms. WILLIAMS. It was in my possession——

Mr. COX. Had you ever seen exhibit 187 prior to the radio visit? Because this is a document that was prepared by the White House and it lists the names and titles of the PRC people who were coming in.

Ms. WILLIAMS. No, this was not, never in my possession.

Mr. COX. When did you first see this document?

Ms. WILLIAMS. During the deposition.

Mr. COX. Can you tell from this document who prepared it?

Ms. WILLIAMS. No.

Mr. COX. I wonder if I could inquire of counsel, do we know who prepared this document, exhibit 187, which says Name List of Delegation? It is my understanding this is a White House document.

Mr. BENNETT. Congressman, I believe the testimony this afternoon will indicate the document was initially prepared by Mr. Chung, and there is handwriting of witnesses who will be called this afternoon who made notations on this document, White House personnel.

Mr. COX. Is it committee staff's understanding that this document was circulated inside the White House prior to the——

Mr. BENNETT. It is our understanding that that is the handwriting of Ms. Nancy Hernreich of the White House.

Mr. BURTON. Mr. Cox, my time has expired.

Mr. COX. I appreciate the gentleman, I will return to this later. Thank you.

Mr. BURTON. Mr. Barrett.

Mr. BARRETT. Thank you, Mr. Chairman. I am curious, first of all, as to whether we will be holding hearings, as I sit here next to the Republican wall of shame, into how he got access to these individuals. Do you plan on holding any hearings on that?

Mr. BURTON. If there's any indication that illegal foreign money came into the RNC, of course we'll look into that.

Mr. BARRETT. Have you attempted at all to discern that?

Mr. BURTON. Well, there has to be some indication that there was wrongdoing before we start an investigation. If you have some evidence, I most certainly will do that. We have evidence in this case. We have $50,000 that we are sure, or almost certain, came from the Bank of China in Beijing.

Mr. BARRETT. Reclaiming my time, Mr. Chairman.

Mr. BURTON. I will give you more time.

Mr. BARRETT. Mr. Chairman, it is my time. If you want to take my time away from me, but it is my time.

Mr. BURTON. We will investigate.

Mr. BARRETT. It is wonderful to put the innuendo on the table that the fact is that the money came from the Bank of China, but that doesn't mean that it is necessarily Chinese Government money. But that is what these hearings are. They are innuendo after innuendo, and it is a travesty that we are looking at this, but we are not spending a second on the Triad Management Group. We're not going to look on that and there are allegations on that, Mr. Chairman. There are real allegations on that, and this committee would not for a second dare spend any time examining allegations against Republicans. And that's why this is such a total travesty. There is no attempt here for fairness. There is no attempt

here to balance these hearings. This is nothing more than going after the President of the United States. That is clearly what this is, and I think that everybody should recognize that.

Ms. Williams, I thank you for being here. I'm sorry that you had to come back. You obviously have spent a lot of time and a lot of money to defend yourself. I frankly don't think that this committee cares about that at all. I think they would be more than happy to have you go into bankruptcy because you committed a mortal sin, Ms. Williams. You worked in a Democratic White House. That was your sin, and if this is going to ruin your life, it's going to ruin your life. And that's the way this committee works and we should all be well aware of that.

I'd like to ask you a couple of questions if I could, please, about your role with Mr. Chung. Before the March 1995 events, Mr. Chung had told you on other visits that he wanted to give to the First Lady, hadn't he?

Ms. WILLIAMS. Yes, that's correct.

Mr. BARRETT. And what did you tell him?

Ms. WILLIAMS. I told him that he could not give personally to Mrs. Clinton. He could do not that.

Mr. BARRETT. And you always told him that, didn't you?

Ms. WILLIAMS. Yes, I told him that would be inappropriate, that we could not do that.

Mr. BARRETT. And you told him that if he wanted to contribute money, he could give to entities such as the DNC and the campaign; is that correct?

Ms. WILLIAMS. That's correct.

Mr. BARRETT. Did you ever suggest to him that if he gave money to the DNC, he would help pay off DNC debts to the First Lady relating to White House Christmas parties?

Ms. WILLIAMS. No, I did not.

Mr. BARRETT. Did you ever say to Ms. Ryan that if Mr. Chung asks her how he could help the First Lady, Ms. Ryan should suggest helping the DNC pay off its debts concerning the Christmas parties?

Ms. WILLIAMS. No, I have no recollection of that.

Mr. BARRETT. You simply passed the check on to DNC when you received it?

Ms. WILLIAMS. Right. That's correct.

Mr. BARRETT. And that was your normal practice? That had happened in other incidences?

Ms. WILLIAMS. With checks, yes.

Mr. BARRETT. Was the incident in which Chung handed you a check the first time anyone had handed you a political contribution check in the White House?

Ms. WILLIAMS. Yes, it is.

Mr. BARRETT. Since this incident, no one came to the office of First Lady to give you a political contribution check?

Ms. WILLIAMS. No.

Mr. BARRETT. Let me ask you this, then. This fellow, again, from these pictures right here, I would put in the category of a political groupie. Would you say that is an accurate description of him?

Ms. WILLIAMS. I don't like to call names.

Mr. BARRETT. I'm not saying that that is a derogatory name. He obviously likes to be around politicians.

Ms. WILLIAMS. Well, he likes to be around politicians.

Mr. BARRETT. Maybe that is the negative. I don't necessarily mean groupie as a negative word. Was he involved in high level policy discussions?

Ms. WILLIAMS. Not to my knowledge.

Mr. BARRETT. He was just someone who liked to be around the First Lady.

Ms. WILLIAMS. He liked to be around the office, yes.

Mr. BARRETT. Just like he apparently liked to be around Governor George Allen, a Republican from Virginia; he liked to be around Governor Christine Whitman, a Republican from New Jersey; he liked to be around majority leader, Senator Bob Dole, a Republican from Kansas; he liked to be around Speaker Newt Gingrich, a Republican from Georgia; he liked to be around Governor Jim Edgar, a Republican of Illinois; Governor Pete Wilson, a Republican of California, and apparently the entire Governor's office is something he liked to be around. So he is a man who liked to be around power. Would you say that is pretty accurate?

Ms. WILLIAMS. I would say that would be correct.

Mr. BARRETT. And how did you treat him differently from other people?

Ms. WILLIAMS. No differently. I tried to accommodate his requests. If I could do something for him, I would. If I could do something for you, I would.

Mr. BARRETT. And so you treated him and his political contribution just like any other one; is that correct?

Ms. WILLIAMS. Just like anybody else, not necessarily even a contributor, but, yeah, I thought I treated him fairly, and I treated him well, and I was gracious to him, and I went out of my way to accommodate his requests, and I felt that that was a job that we were supposed to be doing in our office for everybody.

Mr. BARRETT. OK, thank you. Again, I thank you for your comments. And I think that Mr. Waxman did a wonderful job in his opening statement, because the problem here is, yes, there was too much access to the Democratic White House. There is too much access to Democratic Members of Congress and there is too much access to Republican Members of Congress. People who have money in this society have more influence on Government than people who don't have money. That's what the problem is, and that's why this hearing is a sham because it doesn't really care about that. All it cares about is trying to make the President look as bad as it possibly can, and I yield back the balance of my time.

Mr. BURTON. The gentleman's time has expired. The gentleman from California, Mr. Cox.

Mr. COX. I thank the chairman.

Mr. BURTON. Would you yield to me for 30 seconds?

Mr. COX. Pleased to yield to the chairman.

Mr. BURTON. Let me just correct one thing that my colleague has just said. First of all, we are investigating allegations of illegal foreign contributions coming in to the Republican party and the National Policy Forum. We've had two people in California, detailees and others, talking about Mr. Ted Sioeng, who gave money to the

National Policy Forum as well as the Democrat National Committee. We have subpoenaed and are receiving information on the Young brothers, who had a shell corporation in Miami that gave money to the Republican National Committee. We are looking at both sides.

I understand the reason to try to make it look like we are being totally biased. The fact of the matter is we are not. We are looking at foreign contributions, illegal foreign contributions that may have bought influence in this country in the political process. That's what it's all about.

Mr. BARRETT. Would the gentleman yield?

Mr. BURTON. I do not have the time.

Mr. BARRETT. What about the Triad Management? Are we looking at that, Mr. Chairman?

Mr. BURTON. If the gentleman would yield another 10 seconds, I am going to send a subpoena to Triad. Does that satisfy you?

Mr. BARRETT. I think that that's a positive statement.

Mr. BURTON. Thank you very much. Mr. Cox.

Mr. COX. Reclaiming my time, thank you, Mr. Chairman.

Ms. Williams, do you understand the concern, and I think it is a legitimate one, on both sides of the aisle about illegal foreign payments?

Ms. WILLIAMS. Do I understand the concern?

Mr. COX. About illegal foreign payments?

Ms. WILLIAMS. Yes, I understand the concern.

Mr. COX. And even if you were not aware of it at the time, do you think it's appropriate for this committee to be investigating the apparent connection between a March 6th wire transfer to Johnny Chung for $150,000 from the PRC to the $50,000 check that you received in the White House——

Ms. WILLIAMS. I really don't think it is in my——

Mr. COX [continuing]. A few days later?

Ms. WILLIAMS. I don't think it's really in my purview to say whether or not I think it's the right thing to do.

Mr. COX. Well, I ask this because, as the Chief of Staff to the First Lady of the United States, you have a great deal of experience and judgment. And if questions are being raised about the propriety of the investigation, I just want to know whether or not you can see a prima facie reason for us to investigate when there's a $150,000 wire transfer using the bank of China in Beijing that goes into Johnny Chung's account, and 3 days later, he hands you a $50,000 check inside the White House. Is that something, even though you didn't know at the time, is that something——

Ms. WILLIAMS. Mr. Cox, I did not know that at the time. And with all due respect, and I want you to know this, with all due respect, if you were interested in my opinion about this, you would have asked me before I was here.

Mr. COX. Well, I'm asking you now.

Ms. WILLIAMS. Well, I do not want to make comments now. I am a fact witness here, and I don't necessarily have to give my opinion.

Mr. COX. Fair enough. With the ranking member, you covered the ground of whether or not you solicited this contribution. And it's your opinion as well as your fact testimony that you did not solicit; is that correct?

Ms. WILLIAMS. Well, that is not an opinion. It is fact testimony.

Mr. COX. To the extent it's a legal opinion as well as a fact question, but it's your testimony that you did not solicit for legal purposes; is that right.

Ms. WILLIAMS. That's my testimony.

Mr. COX. You did precisely what? You accepted an envelope, but did not open it?

Ms. WILLIAMS. I don't recall if there was an envelope. I recall that I accepted something that I believed to be a check.

Mr. COX. Why did you believe it to be a check?

Ms. WILLIAMS. Because he said, here I give to you, I give to you. It looked like a check.

Mr. COX. Did you contact the White House Counsel's Office about that check?

Ms. WILLIAMS. No, I did not.

Mr. COX. Were you aware of the guidance from the White House Counsel's Office that it's inappropriate for you to accept that check?

Ms. WILLIAMS. The guidance I believe I had from the White House Counsel was that you could take a check. That did not necessarily constitute acceptance, and since other checks had come through the mail, as long as you passed it on to the appropriate entity.

Mr. COX. Well, to refresh your recollection, the Counsel to the President sent a memo around to all the heads of White House offices that states that Federal law prohibits the receipt of campaign contributions in Federal buildings. It says that Federal employees——

Mr. DENNIS. Is there a document? Excuse me, Congressman. Is there a document number?

Mr. COX. Document—excuse me, exhibit No. 153. And while you're looking for that, I will just read from 18 United States——

Mr. DENNIS. I have it here.

Mr. COX [continuing]. Code, Section 607, which says that it is unlawful for any person to receive, receive, not solicit, but receive any contribution in any room or building occupied in the discharge of official duties. Any person who violates this section shall be fined under this title or imprisoned not more than 3 years or both.

Has your lawyer told you about this criminal code provision prior to your appearing here today?

[Exhibit 153 follows:]

THE WHITE HOUSE

WASHINGTON

April 27, 1995

MEMORANDUM FOR WHITE HOUSE OFFICE
OFFICE OF POLICY DEVELOPMENT AND
OFFICE OF THE VICE PRESIDENT STAFF

FROM: ABNER J. MIKVA
COUNSEL TO THE PRESIDENT

CHERYL MILLS
ASSOCIATE COUNSEL TO PRESIDENT

SUBJECT: Presidential Campaign-Related Political Activity

This memorandum provides employees of the White House Office, the Office of Policy Development and the Office of Vice President with guidance regarding Presidential campaign-related political activity.[1] With the President's formal decision to seek re-election, we wanted to review the rules governing campaign activity by federal employees.

I. Governing Principle

Under the Hatch Act Reform Amendments of 1993 (the Act), most employees[2] paid from appropriations for the Executive Office of the President may engage in political activity: 1) while on duty, 2) while in a federal building, and 3) while using government vehicles, provided that "the costs associated with that activity are not paid for by money derived from the Treasury of the United States." 5 U.S.C. § 7324(b)(1). Activities which incur costs include: faxing, copying, use of computers, and

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[1] General guidance regarding permissible political activity by federal employees under the Hatch Act Reform Amendments of 1993 is provided in an October 12, 1994, memorandum from this Office ("Political Activity Guidance"). Please consult the October 12, 1994, memorandum for a comprehensive discussion of the Act and implementing regulations governing political activity.

[2] Only those Executive Office of the President staff members who duties continue outside normal duty hours and while away from post may engage in political activity while on duty; all other staff members only may engage in political activity during non-duty hours and while not in a federal building. 5 U.S.C. § 7324(b).

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long-distance phone calls.[3] It is important that staff members consider this principle in relation to their activities during the President's re-election campaign; it often will help avoid a problem before it arises.[4]

II. Distinguishing Political and Official Activity

Perhaps one of the more difficult aspects of evaluating on-duty conduct is discerning the difference between official and political activity. As a general matter, activity is political if its primary purpose involves the President's role as a candidate for office or as the leader of the Democratic Party (e.g., appearing at party functions, fundraising, campaigning for specific candidates). 6 O.L.C. 214, 217 (1982). Activity is official if it relates to the President's policies, programs or legislative agenda, even if it concerns matters on which opinion is politically divided. Id. Obviously, however, there are gray areas in between these two definitions; if you have questions regarding particular activities, do not hesitate to contact the Counsel's Office for guidance.

III. Prohibitions on Certain Political Activity

While White House staff may engage in political activity, there are still certain restrictions on such conduct. A number of criminal statutes prohibit the use of federal programs, property or employment for political purposes. Violation of these statutes is punishable by imprisonment and a substantial fine. It is therefore imperative that staff observe the prohibitions outlined below.

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[3] Certain costs are not considered to be borne by the Treasury because they are costs that the government already has incurred for official purposes in the absence of political activity, e.g., office space; employee salaries. 5 C.F.R. § 734.503. But see IV, Section D.

[4] It is important to understand that for the purposes of this memorandum, the official responsibilities that customarily have been performed by the Political Affairs Office constitute "official" and not "political" activities. Therefore, the restraints cited herein do not in general affect the activities, office maintenance, or other costs undertaken or incurred in the discharge of such responsibilities.

Federal employees, including White House employees, may not:

(1) use their official authority or influence for the purpose of interfering with or affecting the result of a nomination or an election of any candidate;

(2) intimidate, threaten, command or coerce any federal employee to engage in or not to engage in any political activity;

(3) ever knowingly solicit, accept or receive a political contribution from any person, including a subordinate or other federal employee;[5]

(4) run for the nomination or as a candidate for election to a partisan political office;

(5) knowingly solicit or discourage the participation in any political activity of any person who has an application for any compensation, grant, contract, ruling, license, permit or certificate pending before the staff member's office; or,

(7) promise or withhold federal benefits (jobs, grants, contracts) based on political support or nonsupport -- including favoring or penalizing employees or withholding employment to induce someone to make a political contribution or otherwise participate in political activity; or,

(8) knowingly solicit or discourage the participation in any political activity of any person who is the subject of, or a participant in, an ongoing investigation, audit, or enforcement action being carried out by the employee's office.

IV. Limitations on Campaign Activities By White House Staff

We have set forth below guidelines to ensure that political activity undertaken by White House staff is within the limits prescribed by law and White House policy. While these guidelines will cover many day-to-day situations that arise, the simplest rule to follow is the "common-sense" practice that anything obviously political that involves the use of resources should be done by the campaign, even if doing it here can be "legally" justified.

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[5] The sole exception to this prohibition is for federal labor or employee organizations. Please consult our Office before undertaking any action implicating this exception.

A. Campaign Meetings on Government Property

1. Small meetings involving campaign or political officials and White House staff members may be held in a White House staff member's office, the West Wing or the Old Executive Office Building, or, if it is a luncheon or breakfast meeting, in the White House Mess, provided that such meetings do not interfere with the conduct of Government business. Such gatherings must be organized by White House staff members who are permitted to engage in political activity in a federal building. Government buildings, including White House offices and meeting rooms, should not be used for meetings or events organized by a campaign or political committee.

2. Campaign fundraising activities of any kind are prohibited in or from government buildings. In addition, federal employees are prohibited from soliciting or accepting campaign contributions. This means that fundraising events may not be held in the White House; also, no fundraising phone calls or mail may emanate from the White House or any other federal building.

3. Campaign-sponsored or other political activities (receptions, dinners, meetings, but not fundraisers) may be held in the Executive Residence, provided that the President, First Lady or some other family member attends the event. Similarly, campaign or other political events (other than fundraisers) also may be held at the Vice President's Residence as long as the Vice President, Mrs. Gore, or some other family members attends the event. The costs of such events at either residence must be paid by the proper campaign or political committee.

B. Campaign Contributions by White House Employees

Under 18 U.S.C. § 603, it is a felony for any officer or employee of the government to give a political contribution to his or her "employer or employing authority." At the very least, this provision prohibits employees of the White House Office, the Office of Policy Development, and the Office of the Vice President (including his Senate staff), and quite probably all federal employees, from contributing to the authorized campaign committee of the President.

C. Receipt of Campaign Contributions at the White House

Federal law prohibits the receipt of campaign contributions in federal buildings. Occasionally, contributions intended for a campaign committee may be addressed to the White House and delivered with other mail. Such contributions should be taken to Jim Dorskind in the Correspondence Department in the Old Executive Office Building, Room 94.

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There should be no acknowledgement of receipt of a contribution from the White House to the contributor. If a contribution is accompanied by a letter that primarily addresses governmental issues, a response to those issues may be prepared and sent from the White House; however, there should be no reference to the contribution.

D. Use of Leave

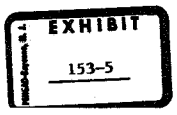
1. Some White House staff members, as leave-earning employees, are entitled to specific amounts of annual leave. As discussed below, such leave may be used for political purposes; however, one cannot take an "advance" on annual leave to engage in political activities. Those White House staff members who are not entitled to annual leave (e.g., commissioned officers) may use a ceiling of 15 days of compensatory leave (i.e., the equivalent of vacation time) for political purposes.

2. All White House staff members must perform their official duties for a minimum of 40 hours per week or 80 hours per two-week pay period in order to receive their full federal salary. If a staff member does not complete 40 hours of official duty in any week, the difference between the number of hours completed and 40 hours must be covered by annual leave, leave without pay, official holidays or made up in the second week of that pay period. The difference cannot be made up in a subsequent pay period.

3. White House staff members who complete a minimum of 40 hours of official duty during any full week (Monday-Sunday) may be absent from their official duty station for no more than one weekday (Monday-Friday) solely for the purposes of engaging in political activity without taking annual leave, compensatory leave, or leave without pay. If a staff member desires to be absent for political purposes for more than one weekday in any week, each additional weekday must be covered by annual leave or leave without pay, regardless of the number of official hours worked during that week. In other words, it is not permissible for a staff member to put in 40 hours of official duty in the first three days of the week and then take the remaining two weekdays off for campaigning without using annual leave, compensatory leave, or leave without pay.

4. Sick leave cannot be used to cover an absence from official duty for the purpose of engaging in political activity.

5. White House staff members are permitted to take leave without pay to cover absences from official duties for the purposes of engaging in political activity.



6. Staff members may use only eight hours of compensatory leave for political activity during any 7-day period unless additional leave is approved by Counsel's Office.

7. When annual leave, compensatory leave or leave without pay is used for political purposes:

(a) Staff members must submit a request for leave for political purposes in advance of the leave period to their White House department supervisor for approval.

b) Following approval, the office supervisor should forward the request to the Counsel's Office for approv(al prior to the leave period.

E. USE OF GOVERNMENT VEHICLES AND MESSENGERS

Generally, government vehicles -- including White House vehicles -- may not be used for political purposes. This means that White House cars may not be used to transport staff members or materials to or from any political committee office, including the President's campaign committee, or event. In addition, White House messengers may not be used to deliver or pick up materials from the DNC or the President's campaign committee. White House vehicles also may not be used to transport staff members or political materials to airports or any other locations if the purpose of the trip is political.

The only exception, excluding official use for compelling security considarations,[6] is for travel to or from a political event in the following circumstances:

(1) the White House staff member is the Chief of Staff or an EOP agency head; and,

(2) the use of the vehicle will occur during the regular work week (Monday through Friday, excluding weekends and holidays); and,

(3) the political or candidate campaign committee pays for the anticipated cost of the vehicle prior to the travel.

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[6] Compelling security considerations requiring use of a government vehicle include, for example, a recent threat to the life or safety of a staff member or overriding national security concerns. Specific approval must be requested from and provided by the Counsel's Office prior to the use of a government vehicle for compelling security considerations.

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Because of the special requirements surrounding departures and arrivals from Andrews Air Force Base, White House vehicles may be used to transport White House staff members to that facility when they are accompanying the President, Vice President, or First Lady on a campaign or political trip. The campaign committee must reimburse the government for the costs of a large rental vehicle for the President or Vice President, as well as for the costs of any other vehicles that are not solely related to the security of the principal traveller (e.g., staff vans).

When the President or Vice President is participating in a campaign or political event in the Washington, D.C., area or other location where White House cars are available for official purposes, White House cars may be used for the Presidential motorcade, with appropriate reimbursement for all vehicles -- including the amount for a large rental vehicle for the President or Vice President -- except those vehicles essential to the security of the President (e.g., Secret Service vehicles).

F. USE OF COMMUNICATIONS SYSTEMS AND COPYING MACHINES

Generally, official White House resources should not be used for campaign purposes. In certain instances where official resources are used for purposes that may be considered campaign-related, there must be prompt reimbursement for the costs incurred by the government. To ensure that White House resources are not used to support campaign activity, White House staff should use only that equipment that has not been paid for from appropriated funds to political activity; if no such equipment is available, the campaign committee should undertake the activity in question.

1. In those limited circumstances in which government communications systems -- telephone, e-mail (which automatically is backed up as a potential presidential record), telegraph, teletype, telecopy or radio -- are used for campaign-related purposes, appropriate reimbursement or payment at the "usual or normal charge," 15 C.F.R. § 100.7(a)(1)(B), must be made by the proper political campaign committee.

2. Because of the need for liaison between limited numbers of White House staff members and various political committees, telephones may be used for local calls. However, White House telephones must not be used, even locally, for regular committee activities such as recruiting volunteers or fundraising.

3. Government credit cards must not be used for campaign-related or other political calls, whether made from inside or outside the White House.

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4. Government operators should not be used by staff members to place campaign-related or other political long distance calls.

5. Campaign-related long distance telephone calls made from the White House may be made only if charged to a credit card issued by the proper campaign or political committee (or on telephones installed and maintained by such committees for exclusive use in dealing with campaign or political matters).

6. The incoming WATS System (800 #) should not be used to call into the White House on campaign or political matters.

7. White House Communications Agency (WHCA) facilities provided outside the White House in connection with travel may continue to be used during mixed and wholly political trips. The facilities must be used exclusively for communications relating to trip planning and arrangements and not for direct political purposes such as campaign fundraising and crowd-building.

8. Government copying machines also should not be used to reproduce materials for transmittal to a campaign or political committee.

G. USE OF PHOTOGRAPHS

1. White House photographers may continue to photograph all Presidential, First Lady, and Vice Presidential activities for the purpose of creating an archival record of this Administration. However, as a general rule, photographs taken by White House photographers at political events may not be used for distribution to individuals attending such events or for any other political or campaign purpose.

2. Photographs taken at events in the Executive Residence (other than politically-sponsored events), at West Wing and East Wing meetings, and at non-political events outside the White House may be distributed consistent with regular practices.

3. A campaign or political committee will be expected to provide a photographer at all campaign and political events for which it desires to distribute photographs to the participants. White House photographers will not photograph receiving lines or greetings at campaign or political events, except to the extent necessary for archival purposes.

4. A campaign or political committee may purchase, for its use, photographs taken by White House photographers in those limited circumstances where those photographs provide the only source for a particular picture. All photograph purchase requests from the campaign or political committee must be

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directed to the Director of the White House Photo Office. A record of all campaign photo requests will be maintained by the Director of the White House Photo Office, who will be responsible for billing the campaign or political committee for all photo orders on a monthly basis at the normal rate and according to the procedures established by the Government for the purchase of such pictures.

H. CORRESPONDENCE

1. Campaign and political correspondence should not be produced at the White House using White House resources, nor can White House stationery, stamps or related supplies be used in the preparation of such correspondence at another location.

2. As stated earlier, federal law prohibits the receipt of contributions in Federal buildings. Occasionally, contributions intended for a campaign committee may be addressed to the White House and delivered with other mail. Such contributions should be taken to Jim Dorskind in the Correspondence Department in the Old Executive Office Building, Room 94. There should be no acknowledgement of receipt of a contribution from the White House to the contributor. If the contribution is accompanied by a letter that deals primarily with governmental issues, a response dealing with those issues may be prepared and sent from the White House; however, there must be no reference to the contribution.

VI. CONCLUSION

These guidelines are designed to address many of the issues that you may confront during the President's re-election campaign. Staff members are encouraged to contact our Office -- or the Vice President's Counsel for OVP staff -- for guidance if you have any questions about appropriate activity by White House employees.

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Ms. WILLIAMS. If I understand it, my lawyer wrote a letter about it.

Mr. DENNIS. Mr. Cox, if I might address that particular issue——

Mr. COX. I'm just——

Mr. DENNIS [continuing]. Since you asked what her lawyer had to say.

Mr. COX. I'm curious whether the witness at this time is aware of this criminal statute.

Mr. DENNIS. I'm aware of it. She's aware of it.

Mr. COX. I thank counsel. The advice memorandum from the White House Counsel's Office.

Mr. LANTOS. Regular order, Mr. Chairman.

Mr. BURTON. Mr. Cox, you may conclude this question, and then we'll go on to the next Member.

Mr. COX. Now that we've identified the exhibit, is that something that you recognize that was received in your office?

Ms. WILLIAMS. I'm sorry. Yes. I believe it was.

Mr. COX. I thank the witness, and I yield back.

Mr. BURTON. The gentleman's time has expired. Mr. Fattah.

Mr. FATTAH. Thank you, Mr. Chairman. And I, for one, am pleased to hear the chairman's announcement that he has issued a number of subpoenas and looking into various matters that have been raised. So as one who, at times, raised questions in that regard, I want to commend you in your announcement. And I hope that, as we go forward, we can continue to find opportunities in which we will be able to agree.

Let me mention a couple things for the record quickly. One is that it is the law that you can't receive these contributions. What that means in the U.S. Congress is, if you receive a check here, you have 7 days to transfer it out to your political office. And that is the rule both here in the House and in the Senate and the rule in the White House as by—pursuant to advice of counsel which we have, if one would read the complete document, is that you must move the check along. And that's what you did. You received a check. And you sent it on to the DNC?

Ms. WILLIAMS. That's correct.

Mr. FATTAH. So there should be no confusion that here, under the rules of the U.S. Congress, these are Federal buildings under which work takes place. It is a perfectly legal practice that people receive checks. And they have, under the rules of the Congress, 7 days, an entire week, to move those checks on to their various campaign committees and in the Senate. And the White House has a rule to do it, and they, in fact, do it much more expeditiously than our rules call for.

Mr. COX. Would the gentleman yield, because that's not the law at all.

Mr. FATTAH. Excuse me. I would be glad to yield at my completion. I want to talk about this issue of access because this is a fascinating subject to me. We're talking here as co-equal branches of the Government, the executive and the legislature. We're talking about someone who is writing checks having access to come and visit. We have more than 1,000 people here in the Capitol every day who have written checks to tens and dozens of Members of Congress who access various offices every day as paid lobbyists.

They're here to talk to Members of Congress about matters of importance to them.

Now, we have this gentleman, Mr. Chung, and I take issue with people who have used his name in derogatory terms on both sides of the committee, because I'm not sure at all that that's appropriate. I think that we know something about the culture of Asian Americans who in their conduct of business place a great deal of reliance on pictures and relationships and business cards and things that here in America one might see a little bit different. But it's part of their custom. And as we can see, he was quite aggressive. And as a businessman in his initial enterprises, was also quite successful.

So until at such time that there's something clearly on the record that this American has violated the law, I'm not sure that we as a committee should be speaking of him in derogatory terms. But, nonetheless, if our concern is that someone is writing checks and showing up more than 50 times in the White House over a span of 3, 4, or 5 years, we have people who write checks and show up here every day, every single day.

And so we even have, and I want to enter into the record a story from the Wall Street Journal, "Gingrich Backer Had Unusual Access As a Volunteer in the Speaker's Office," a Donald Jones. He was a CEO helping to deal with a very important piece of legislation that he had some interest in.

I also have another account from the Washington Post, which showed that the majority party here invited a group of lobbyists representing the largest polluters in our country into the room to draft the laws that would, in fact, govern who would be liable for the pollution and the deterioration of property that they had caused.

So this issue of access, to the degree that this committee is interested in it, is something that I think we could have a broad scope on. And I—this other thing that was mentioned in the chairman's opening remarks and has been referred to again is Don Fowler's letter to Johnny Chung so that he could either visit China or use it in some way.

Haley Barbour not only wrote a letter, but Haley Barbour went to China with the principal of the Young Brothers in order to help facilitate. In fact, his quote in the story that I also would like to put in the record, Mr. Chairman, Mr. Young said, well, Mr. Barbour——

Mr. BURTON. Without objection.

[The information referred to follows:]

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Gingrich Backer Had Unusual Access As a Volunteer in the Speaker's Office

By PHIL KUNTZ
Staff Reporter of THE WALL STREET JOURNAL

WASHINGTON – Donald Jones, a wealthy backer of House Speaker Newt Gingrich, has taken the concept of being a Washington insider to new heights. The Wisconsin telecommunications entrepreneur enjoyed unusual access to the speaker as House leaders fine-tuned a sweeping telecommunications bill earlier this year.

He wasn't a member of the speaker's staff. Nor was he a lobbyist. Instead, he was a volunteer in Mr. Gingrich's office for up to three days a week, helping the speaker on what Mr. Jones says were technical aspects of telecommunications matters, among other tasks. At the same time, he was also pursuing business ventures, hiring two former House aides who wanted to sell Internet services to members of Congress.

Donald Jones

Mr. Jones made his money building and then selling a 235,000-home cable system called Star Cablevision. Today, his telecommunications holdings represent a small portion of his total net worth, which he declines to disclose, according to his attorney Louis Andrew. Those holdings are concentrated in a business called Cyberstar that has cable interests in Wisconsin and the Virgin Islands, and also this year invested $1.6 million to start a partnership called US Cyber that sells Internet access and related services.

The speaker and Mr. Jones met in the late 1980s through Mr. Jones's role as a "checkbook citizen," as he puts it. He has given $125,000 to the Republican party, about $25,000 to Gopac, the political action committee formerly led by Mr. Gingrich and thousands more to other GOP causes. The two became close friends.

After last fall's GOP victory, Mr. Gingrich asked Mr. Jones to give more than money. So Mr. Jones wrote to Mr. Gingrich's top aide that he'd volunteer at least two full days a week in the areas of "technology and information systems implementation, culture and change management ideas and education." At Mr. Gingrich's request, he agreed to help set up the House's new Internet service and the nonprofit Earning by Learning Foundation, a program initiated by the congressman that pays children $2 for each book they read.

Veteran observers of Congress say they aren't aware of a businessman regularly working gratis for a congressman for many months. "It's very rare," says Richard Shapiro, head of the nonpartisan Congressional Management Foundation.

To be sure, special access long has been enjoyed by many well-heeled interests. Both parties' big contributors routinely get private meetings with top lawmakers. Since taking over Congress, Republican leaders have worked closely with business lobbyists and conservative groups, just as Democrats do with liberal organizations and labor unions.

But both parties have come under fire recently for getting too tight with private-sector allies. The Republicans were castigated for allowing lobbyists to draft parts of their pro-business bills. Likewise, President Clinton was lambasted for giving White House access passes to favored consultants, including Harold Ickes, who represented Puerto Rico before becoming deputy chief of staff.

Under pressure, Mr. Clinton retrieved the passes of some and required his closest political advisors – James Carville, Paul Begala, Stan Greenberg and Mandy Grunwald – to submit to FBI checks and financial disclosure. The White House may expand the disclosure rule to other campaign consultants, such as Dick Morris.

Mr. Jones's role was different. His volunteer job, by all appearances, made him almost a de-facto member of the speaker's staff. House rules meant to prevent private interests from gaining "undue advantage" allow the use of volunteers, but only in very limited circumstances. They are allowed if a member has a "clearly defined" program aimed primarily at educating volunteers, who can't do tasks normally handled by paid aides. The rules also bar members from soliciting volunteers.

In most cases, executive branch agencies also can't allow private individuals to serve as employees for free, according to Gary Keppinger, a General Accounting Office lawyer. The President himself has much wider latitude in seeking advice, and there are a host of laws allowing special volunteer programs and advisory panels, some that include vested interests.

From the speaker's point of view, the public benefits from Mr. Jones's volunteerism. "To the best of my knowledge, Don Jones is an ethical and upstanding citizen," he says in a statement. "He has done nothing inappropriate." Mr. Andrew describes Mr. Jones as wholly altruistic: "He's a guy who reaped a lot of the benefits of our society, and now he's trying to make a contribution."

In a confidential June 30 memo to associates, Mr. Jones called himself "a trusted listener and companion" to the speaker, often spending "2 to 3 hours daily" with him. Mr. Jones wrote that they "rarely" talked about policy, but cited four times when his ideas "resulted in . . . actions on national strategic directives on huge matters."

He described his telecommunications role this way: "The content of the House bill is the subject of daily negotiations involving the speaker, committee chairmen, and a constant parade of TelCo CEOs. I participate as an observer and interpret and analyze the subtleties of the meeting for the speaker." In the end, the bill treated both Internet and cable services favorably by deregulating rates, among other things.

Through his lawyer, Mr. Jones says he attended only one meeting on the bill and never counseled the speaker on its substance. "He analyzes the technical matters" for Mr. Gingrich, says Mr. Andrew. Mr. Jones also denies influencing huge policy matters.

Mr. Andrew says the pair's only talk on the bill's specifics involved the Senate's so-called "cyberporn" amendment. Aimed at protecting children, it is strongly opposed by many in the on-line industry—not just adult-material providers — because they fear criminal liability for material posted by customers. Mr. Gingrich disappointed allies on the Religious Right when he took a high-profile role opposing the amendment in June, later working with members on a pro-industry alternative overwhelmingly approved by the House. Aides said his position was consistent with his long-held and strongly felt First Amendment views.

Mr. Andrew says Mr. Gingrich informed Mr. Jones ahead of time of his position. "Gingrich brought it up," he says. Although Mr. Jones also opposed the amendment, he "told Newt Gingrich nothing," the lawyer says. Mr. Jones then told his US Cyber partners that Mr. Gingrich agreed with the industry.

Mr. Jones says he didn't know at the time that he and his US Cyber partners had a very direct interest in the cyberporn amendment. US Cyber in March had hired Jeff Coleman, an Internet entrepreneur from Tucson, Ariz., who ran an on-line subscription service. Upon joining US Cyber, he turned over his service — and its income — to his new employer. Among other offerings, one of its on-line pages boasted "gigabytes of the best adult files on-line," including pictures and direct access to sexual forums.

Mr. Coleman says the adult services, which required users to prove they were at least 18 years old, provided up to 40% of his system's $100,000-a-year gross. Mr. Jones says he didn't find out until about June that the system his company had acquired offered adult entertainment. "He wouldn't have done this in a million years if he had known," says Mr. Andrew. After a management dispute that had little to do with the adult services, according to the lawyer, Mr. Jones parted ways with Mr. Coleman and his system in July.

At about the same time, Mr. Jones was mulling a new business proposal from a pair of one-time House aides he'd met through his work on a project dear to Mr. Gingrich — setting up the House's new Internet service. Richard Pournelle and Robert Vanasse wanted to set up a new Cyberstar arm that would "leverage" their Washington contacts to sell Internet services to members of Congress and Republican groups, a concept paper by Mr. Vanasse says.

Mr. Jones liked the idea and hired them. But they ended up helping run US Cyber instead because Mr. Jones had a bitter falling out with his partners in that venture in August — a time-consuming dispute that caused him to stop working regularly for the speaker. Mr. Vanasse says there are no current plans to sell to lawmakers, but he hopes the company will enter the political and public affairs market eventually.

In any case, Mr. Vanasse adds, the company won't use Mr. Jones's contacts for sales leads: "He's very careful to maintain a wide separation between his public service and anything he does in business."

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A SECTION

Forging an Alliance for Deregulation; Rep. DeLay Makes Companies Full Partners in the Movement Series: INSIDE THE REVOLUTION: BUSINESS AND THE HOUSE REPUBLICANS Series Number: occ

Michael Weisskopf; David Maraniss
Washington Post Staff Writers

First in a series of occasional articles

The day before the Republicans formally took control of Congress, Rep. Tom DeLay strolled to a meeting in the rear conference room of his spacious new leadership suite on the first floor of the Capitol. The dapper Texas Congressman, soon to be sworn in as House majority whip, saw before him a group of lobbyists representing some of the biggest companies in America, assembled on mismatched chairs amid packing boxes, a huge, unplugged copying machine and constantly ringing telephones.

He could not wait to start on what he considered the central mission of his political career: the demise of the modern era of government regulation.

Since his arrival in Washington a decade earlier, DeLay, a former exterminator who had made a living killing fire ants and termites on Houston's wealthy west side, had been seeking to eradicate federal safety and environmental rules that he felt placed excessive burdens on American businesses.

During his rise to power in Congress, he had befriended many industry lobbyists who shared his fervor. Some of them were gathered in his office that January morning at the dawn of the Republican revolution, energized by a sense that their time was finally at hand.

The session inaugurated an unambiguous collaboration of political and commercial interests, certainly not uncommon in Washington but remarkable this time for the ease and eagerness with which these allies combined. Republicans have championed their legislative agenda as an answer to popular dissatisfaction with Congress and the federal government. But the agenda also represents a triumph for business interests, who after years of playing a primarily defensive role in Democratic-controlled Congresses now find themselves a full partner of the Republican leadership in shaping congressional priorities.

The campaign launched in DeLay's office that day was quick and successful. It resulted last month in a lopsided vote by the House for what once seemed improbable: a 13-month halt to the sorts of government directives that Democrats had viewed as vital to ensuring a safe and clean society but that many businesses often considered oppressive and counterproductive. A similar bill is under consideration in the Senate, where its chances of approval are not as certain.

Although several provisions of the "Contract With America" adopted by Republican House candidates last fall take specific aim at rolling back federal regulations, the moratorium was not part of that. In fact, as outlined that day in DeLay's office by Gordon Gooch, an oversized, folksy lobbyist for energy and petrochemical interests who served as the congressman's initial legislative ghost writer, the first draft of the bill called for a limited, 100-day moratorium on rule-making while the House pushed through the more comprehensive antiregulatory plank in the Contract.

But his fellow lobbyists in the inner circle argued that was too timid, according to participants in the meeting. Over the next few days, several drafts were exchanged by the corporate agents. Each new version sharpened and expanded the moratorium bill, often with the interests of clients in mind -- one provision favoring California motor fleets, another protecting industrial consumers of natural gas, and a third keeping alive Union Carbide Corp.'s hopes for altering a Labor Department requirement.

As the measure progressed, the roles of legislator and lobbyist blurred. DeLay and his assistants guided industry

supporters in an ad hoc group whose name, Project Relief, sounded more like a Third World humanitarian aid effort than a corporate alliance with a half-million-dollar communications budget. On key amendments, the coalition provided the draftsman. And once the bill and the debate moved to the House floor, lobbyists hovered nearby, tapping out talking points on a laptop computer for delivery to Republican floor leaders.

Many of Project Relief's 350 industry members had spent the past few decades angling for a place of power in Democratic governing circles and had made lavish contributions to Democratic campaigns, often as much out of pragmatism as ideology. But now they were in the position of being courted and consulted by newly empowered Republicans dedicated to cutting government regulation and eager to share the job.

No congressman has been more openly solicitous in that respect than DeLay, the 47-year-old congressional veteran regarced by many lawmakers and lobbyists as the sharpest political dealer among the ruling House triad that includes fellow Texan Richard K. Armey, the majority leader, and Speaker Newt Gingrich of Georgia.

DeLay described his partnership with Project Relief as a model for effective Republican lawmaking, a fair fight against Democratic alliances with labor unions and environmentalists. "Our supporters are no different than theirs," DeLay said of the Democrats. "But somehow they have this Christ-like attitude what they are doing [is] protecting the world when they're tearing it apart." Turning to business lobbyists to draft legislation makes sense, according to DeLay, because "they have the expertise."

But the alliance with business and industry demonstrated in the push for a moratorium is not without peril for Republicans, many GOP strategists acknowledge. The more the new Republican leaders follow business prescriptions for limited government in the months ahead, the greater the risk that they will appear to be serving the corporate elite and lose the populist appeal that they carried with them into power in last November's elections.

William Kristol, a key Republican analyst whose frequent strategy memos help shape the conservative agenda, said the way congressional leaders deal with that apparent conflict could determine their prospects for consolidating congressional power. "If they legislate for special interests," he said, "it's going to be hard to show the Republican Party has fundamentally changed the way business is done in Washington."

After graduating from the University of Houston with a biology degree in 1970, Tom DeLay, the son of an oil drilling contractor, found himself managing a pesticide formula company. Four years later he was the owner of Albo Pest Control, a little outfit whose name he hated but kept anyway because a marketing study noted it reminded consumers of a well-known brand of dog food.

By his account, DeLay transformed Albo into "the Cadillac" of Houston exterminators, serving only the finest homes. But his frustrations with government rules increased in tandem with his financial success. He disparaged federal worker safety rules, including one that required his termite men to wear hard hats when they tunneled under houses. And the Environmental Protection Agency's pesticide regulations, he said, "drove me crazy." The agency had banned Mirex, a chemical effective in killing fire ants but at first considered a dangerous carcinogen by federal bureaucrats. By the time they changed their assessment a few years later, it was too late: Mirex makers had gone out of business.

The cost and complexity of regulations, DeLay said, got in the way of profits and drove him into politics. "I found out government was a cost of doing business," he said, "and I better get involved in it."

He arrived in the Texas legislature in 1978 with a nickname that defined his mission: "Mr. DeReg." Seven years later he moved his crusade to Washington as the congressman from Houston's conservative southwest suburbs. He sought to publicize his cause by handing out Red Tape Awards for what he considered the most frivolous regulations.

But it was a lonely, quixotic enterprise, hardly noticed in the Democrat-dominated House, where systematic regulation of industry was seen as necessary to keep the business community from putting profit over the public interest and to guarantee a safe, clean and fair society. The greater public good, Democratic leaders and their allies in labor and environmental groups argued, had been well served by government regulation. Countless highway deaths had been prevented by mandatory safety procedures in cars. Bald eagles were flying because of the ban on DDT. Rivers were saved by federal mandates on sewerage.

DeLay nonetheless was gaining notice in the world of commerce. Businessmen would complain about the cost of regulation, which the government says amounts to $430 billion a year passed along to consumers. They would cite what they thought were silly rules, such as the naming of dishwashing liquid on a list of hazardous materials in the workplace. They pushed for regulatory relief, and they saw DeLay as their point man.

The two-way benefits of that relationship were most evident last year when DeLay ran for Republican whip. He knew the best way

to build up chits was to raise campaign funds for other candidates. The large number of open congressional seats and collection of strong Republican challengers offered him an unusual opportunity. He turned to his network of business friends and lobbyists. "I sometimes overly prevailed on" these allies, DeLay said.

In the 1994 elections, he was the second-leading fund-raiser for House Republican candidates, behind only Gingrich. In adding up contributions he had solicited for others, DeLay said, he lost count at about $2 million. His persuasive powers were evident in the case of the National-American Wholesale Grocers Association PAC, which already had contributed $120,000 to candidates by the time DeLay addressed the group last September. After listening to his speech on what could be accomplished by a pro-business Congress, they contributed another $80,000 to Republicans and consulted DeLay, among others, on its distribution.

The chief lobbyist for the grocers, Bruce Gates, would be recruited later by DeLay to chair his antiregulatory Project Relief. Several other business lobbyists played crucial roles in DeLay's 1994 fund-raising and also followed Gates's path into the antiregulatory effort. Among the most active were David Rehr of the National Beer Wholesalers Association, Dan Mattoon of BellSouth Corporation, Robert Rusbuldt of Independent Insurance Agents of America and Elaine Graham of the National Restaurant Association.

At the center of the campaign network was Mildred Webber, a

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political consultant who had been hired by DeLay to run his race for whip. She stayed in regular contact with both the lobbyists and more than 80 GOP congressional challengers, drafting talking points for the neophyte candidates and calling the lobbyist bank when they needed money. Contributions came in from various business PACs, which Webber bundled together with a good-luck note from DeLay.

"We'd rustle up checks for the guy and make sure Tom got the credit," said Rehr, the beer lobbyist. "So when new members voted for majority whip, they'd say, 'I wouldn't be here if it wasn't for Tom DeLay.' "

For his part, DeLay hosted fund-raisers in the districts and brought challengers to Washington for introduction to the PAC community. One event was thrown for David M. McIntosh, an Indiana candidate who ran the regulation-cutting Council on Competitiveness in the Bush administration under fellow Hoosier Dan Quayle. McIntosh won and was named chairman of the House regulatory affairs subcommittee. He hired Webber as staff director.

It was with the lopsided support of such Republican freshmen as McIntosh that DeLay swamped two rivals and became the majority whip of the 104th Congress. Before the vote, he had received final commitments from 52 of the 73 newcomers.

The Freeze

The idea for Project Relief first surfaced before the November elections that brought Republicans to power in the House for the first time in 40 years. Several weeks after the election, it had grown into one of the most diverse business groups ever formed for specific legislative action. Leaders of the project, at their first post-election meeting, discussed the need for an immediate move to place a moratorium on federal rules. More than 4,000 regulations were due to come out in the coming months, before the Republican House could deal with comprehensive antiregulatory legislation.

DeLay agreed with the business lobbyists that a regulatory "timeout" was needed. He wrote a letter to the Clinton administration Dec. 12 asking for a 100-day freeze on federal rule-making. The request was rejected two days later by a mid-level official who described the moratorium concept as a "blunderbuss." DeLay then turned to Gooch to write legislation that would do what the administration would not.

At the Jan. 3 meeting in DeLay's office, Paul C. Smith, lobbyist for some of the nation's largest motor fleets, criticized Gooch's draft because it excluded court-imposed regulations. He volunteered to do the next draft and came back with a version that addressed the concerns of his clients. Under court order, the EPA was about to impose an air pollution plan in California that might require some of Smith's clients -- United Parcel Service and auto leasing companies -- to run vehicles on ultraclean fuels, requiring the replacement of their fleets.

Smith removed the threat with a stroke of his pen, extending the moratorium to cover court deadlines. He also helped Webber add wording in a later amendment that extended the moratorium from eight to 13 months.

Peter Molinaro, a mustachioed lobbyist for Union Carbide, had

a different concern: He wanted to make sure the moratorium would not affect new federal rules if their intention was to soften or streamline other federal rules. The Labor Department, for example,

was reviewing a proposal to narrow a rule that employers keep records of off-duty injuries to workers. Union Carbide, Molinaro noted in an interview, had been fined $50,000 for violating that rule and was eager for it to be changed.

For his part, Gooch wanted to make sure that the routine, day-to-day workings of regulatory agencies would not be interrupted by a moratorium. His petrochemical clients rely on the Federal Energy Regulatory Commission to make sure natural gas and oil, used in their production processes, flow consistently and at reasonable rates.

Gooch said he had "no specific mission" other than helping DeLay. "I'm not claiming to be a Boy Scout," he added. "No question I thought what I was doing was in the best interests of my clients."

The War Room

On the first day of February, 50 Project Relief lobbyists met in a House committee room to map out their vote-getting strategy for the moratorium bill. Their keynote speaker was DeLay, who laid out his

basic objective: making it a veto-proof bill by lining up a sufficient number of Democratic cosponsors. They went to work on it then and there.

Kim McKernan of the National Federation of Independent Business read down a list of 72 House Democrats who had just voted for the GOP balanced budget amendment, rating the likelihood of their joining the antiregulatory effort. The Democrats were placed in Tier One for gettable and Tier Two for questionable.

Every Democrat, according to participants, was assigned to a Project Relief lobbyist, often one who had an angle to play.

The nonprescription drug industry chose legislators with Johnson & Johnson plants in their districts, such as Ralph M. Hall of Texas and Frank Pallone Jr. of New Jersey. David Thompson, a construction industry official whose firm is based in Greenville, S.C., targeted South Carolina congressman John M. Spratt Jr.

Federal Express, with its Memphis hub, took Tennessee's John S. Tanner. Southwestern Bell Corp., a past campaign contributor to

Blanche Lambert Lincoln of Arkansas, agreed to contact her. Retail farm suppliers picked rural lawmakers, including Charles W. Stenholm of Texas.

As the moratorium bill reached the House floor, the business coalition proved equally potent. Twenty major corporate groups advised lawmakers on the eve of debate Feb. 23 that this was a key vote, one that would be considered in future campaign contributions.

McIntosh, who served as DeLay's deputy for deregulation, assembled a war room in a small office just off the House floor to respond to challenges from Democratic opponents. His rapid response team included Smith, the motor fleet lobbyist, to answer environmental questions; James H. Burnley IV, an airline lobbyist who had served as transportation secretary in the Reagan

administration, to advise on transportation rules; and UPS lobbyist Dorothy Strunk, a former director of the Occupational Health and Safety Administration, to tackle workplace issues. Project Relief chairman Gates and lobbyists for small business and trucking companies also participated.

When Republicans leaders were caught off guard by a Democratic amendment or alerted to a last-minute problem by one of their allies, Smith would bang out responses on his laptop computer and hand the disk to a McIntosh aide who had them printed and delivered to the House floor.

The final vote for the moratorium was 276 to 146, with 51 Democrats joining DeLay's side. Still 14 votes short of the two-thirds needed to override a veto, the support exceeded the original hopes of Project Relief leaders.

One week later, DeLay appeared before a gathering of a few hundred lobbyists, lawmakers and reporters in the Caucus Room of the Cannon House Office Building to celebrate the House's success in voting to freeze government regulations and, in a pair of companion bills, curtail them. He stood next to a five-foot replica of the Statue of Liberty, wrapped from neck to toe in bright red tape, pulled out a pair of scissors, and jubilantly snipped away.

Standing next to him, brandishing scissors of his own, was the chairman of Project Relief.

Staff researcher Ann O'Hanlon contributed to this report.

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PHOTO,,James Parcell
CAPTION: House Majority Whip Tom DeLay (R-Tex.), center, meets in his office with deputy whips, including J. Dennis Hastert (Ill.), left, and Randy J. Tate (Wash.)

---- INDEX REFERENCES ----

NAMED PERSON: TOM DELAY; RICHARD K. ARMEY; NEWT GINGRICH

ORGANIZATION: CONTRACT WITH AMERICA; REPUBLICAN PARTY

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Mr. FATTAH [continuing]. Traveling with him, it helped put powder on his face. That was the suggestion that it made him look like someone who knew important people in the United States and therefore could help facilitate business transactions here.

So this is not a letter that was written. This was a party chairman, someone who, on a weekly basis, met with the majority leaders and Speaker here and Senator Lott and the majority leader in the Senate as to the conduct of legislative business.

This party chairman got up and went to China in order to facilitate this gentleman's business transactions. This is the same gentleman who they borrowed the $2 million from and then decided not to repay it in order to finance the Republican contest in the 1996 elections.

I just want to ask you, Ms. Williams, since you've said that you have done nothing wrong, and no one here has accused you of doing anything wrong, and you've been brought here from Paris, this committee is investigating Mr. Chung's access to the White House. You were not at any time involved in any discussions with him about official actions or policies in the White House?

Ms. WILLIAMS. No. Not at any time.

Mr. FATTAH. And you don't have any knowledge of him ever seeking policy changes in terms of the White House in any regard.

Ms. WILLIAMS. No, not to my knowledge.

Mr. FATTAH. So if the committee was investigating contributions for improper influences on policy, you would have some difficulty helping us in that regard.

Ms. WILLIAMS. Yes.

Mr. FATTAH. I want to thank you for your appearance here today.

Ms. WILLIAMS. OK.

Mr. BURTON. The gentleman's time is expired. Ms. Ros-Lehtinen. Excuse me, Mr. Horn.

Mr. HORN. I'll pass.

Mr. BURTON. You'll pass right now. Mr. Barr.

Mr. BARR. Thank you, Mr. Chairman. In the time period that we've been talking about here, Ms. Williams, that is March and April 1995, what was your official title?

Ms. WILLIAMS. Assistant to the President, Chief of Staff to the First Lady.

Mr. BARR. OK. How were you paid?

Ms. WILLIAMS. How was I paid?

Mr. BARR. Yes, ma'am.

Ms. WILLIAMS. By the U.S. Government.

Mr. BARR. OK. You received a Government paycheck?

Ms. WILLIAMS. Yes, sir.

Mr. BARR. Drawn on funds from the Treasury Department?

Ms. WILLIAMS. Yes.

Mr. BARR. OK. One of the locations that we've been talking about here was your office. Where, again, was your office located again during this time period that we're talking about here?

Ms. WILLIAMS. The office that I worked out of was in the Old Executive Office Building. I also had an office in the White House building.

Mr. BARR. OK. And in both of those were locations that were used for the discharge of official duties; is that correct?

Ms. WILLIAMS. Yes. That is correct.

Mr. BARR. OK. Thank you. If we can have exhibit 174 replaced on the screen, please, I would appreciate it.

We have talked about this. But I just wanted to redirect your attention to it. This is a check dated March 9, 1995, from Mr. Chung to DNC for $50,000. And you've testified that you knew that this was a check. I think your words were it looked like a check. And it does give every appearance of that; is that correct?

[Note.—Exhibit 174 may be found on p. 49.]

Ms. WILLIAMS. Yes.

Mr. BARR. OK. Is it a political check?

Ms. WILLIAMS. It's a check made out to the DNC.

Mr. BARR. What is the DNC?

Ms. WILLIAMS. The Democratic National Committee.

Mr. BARR. Is that a political organization?

Ms. WILLIAMS. Yes, it is.

Mr. BARR. OK. In your written statement, on page 2, and I don't recall whether or not you read this in its entirety, but on page 2 of your written statement, dated today, the second paragraph, I'm going to quote this here, and if you would, just read along just to make sure that I do quote it properly: "So when he asked how he could give and show his support, I told him he could support the DNC or give to the Clinton/Gore campaign."

Have I read that accurately?

Ms. WILLIAMS. Yes.

Mr. BARR. And that is your testimony?

Ms. WILLIAMS. Yes.

Mr. BARR. OK. Now, if we could have exhibit 153 replaced, please. This is the memo that I think Mr. Cox drew your attention to just a short while ago, dated April 1995. I would like to quote, just to make sure that we're accurately stating what the Counsel to the President stated. In the first paragraph on page 1, it states that this is a review, in other words, not annunciation of new policies or new-found statutes; this is a review.

We then look also at page 2. It says that there are a number of criminal statutes which prohibit the use of Federal programs, property, or employment for political purposes. And these are punishable by imprisonment and substantial fine.

On page 3, at item 3, up toward the top of the page there, it says that Federal employees, including White House employees, may not knowingly receive a political contribution from any person.

Then down toward the—let's go over to page 4. And in paragraph (A)(2), campaign fund-raising activities of any kind are prohibited in or from government buildings. In addition, Federal employees are prohibited from soliciting or accepting campaign contributions.

Down at the bottom of page 4, paragraph C, Federal law prohibits the receipt of campaign contributions in Federal buildings.

And here it comes to something that I think there's been a little confusion about. And I think it's deliberate. There is a reference to mail. The check that we're talking about here from Mr. Chung was not mailed, was it?

Ms. WILLIAMS. No, it was not.

Mr. BARR. I didn't think so. It was received in person by you. Now, if we could, then, turn our attention—and I know your coun-

sel is a man very learned in the criminal law, having been a U.S. attorney—to Title 18 of the United States Code, which is the criminal code, section 607.

I would respectfully suggest that you speak with him, because in your testimony today, you have laid out each and every element of section 607(A), which is a Federal criminal statute, which says it shall be unlawful for any person, and any person is defined in section 603 to include yourself, pursuant to your sworn testimony, to solicit or receive any contribution—you have received a contribution, this check—within the meaning of section 301(A) to the Federal Election Campaign Act in 1971 in any room or building occupied in the discharge of official duties. And we have established that the office in which you operate in and which you received this check fits that category.

I would suggest that you have a very serious discussion with your attorney because I think you have violated section 607(A) of the U.S. Criminal Code.

Mr. DENNIS. Mr. Barr, may I speak to that issue or Mr. Chairman, if I might?

Mr. BURTON. Yes. You'll be allowed to answer.

Mr. DENNIS. My client is not being a lawyer. I would like to make a part of the record a letter that I sent to Joseph diGenova, dated March 6, 1997, in response to an——

Mr. BARR. Mr. Chairman, if I could?

Mr. FATTAH. Can we let the counsel speak, please?

Mr. BARR. Hold on just a moment.

Mr. FATTAH. Mr. Chairman.

Mr. BARRETT. Regular order, Mr. Chairman.

Mr. BARR. Mr. Chairman, I have a parliamentary inquiry.

Mr. BURTON. State your parliamentary inquiry.

Mr. BARR. When we refer to documents, and folks on the other side are very quick to jump on us if the document is not on the screen and if the document is not in the hands of the witness, to make sure that they have copies of documents——

Mr. BARRETT. Regular order, Mr. Chairman. If he can state it in the form of an inquiry rather than a soliloquy.

Mr. BURTON. I will listen to the inquiry and then make a decision. Just 1 second.

Mr. BARR. Thank you, Mr. Chairman. In this case, it is not the witness, but her counsel that is seeking to read into the record and discuss the document that we don't even have, and I would, therefore, object to that.

Mr. BURTON. Well, I would appreciate that. But I think the Chair will allow a little latitude here to hear what the counsel has to say.

Mr. BARR. If I might just pose one further question, Mr. Chairman, and that is could counsel extend us the same courtesy that we extend to him and furnish those copies of the document to which he's referring?

Mr. BURTON. Does the counsel have copies of this document?

Mr. DENNIS. I have no additional copies. I can have copies made. But I can certainly refer to this and read from it and provide copies of the letter after my statement. I would be happy to do that.

Mr. BURTON. OK. Well, we'll allow you to go ahead, and we would like to have copies for Mr. Barr and other Members.

Mr. DENNIS. Thank you——

Mr. BURTON. Proceed.

Mr. DENNIS [continuing]. Mr. Chairman. This is not a very long letter, but let me read it into the record. It says: "Dear Joe"—Mr. diGenova by the way was former U.S. attorney of the District of Columbia.

"Your off-the-cuff opinion on the Hatch Act given to the national media is 101 years out of date. You are quoted as taking issue with my client's handling of a political contribution to the Democratic National Committee calling it," quote, "totally improper," end quote, "because in your words," quote, "it is illegal to receive Federal campaign funds on the property of the White House or the Executive Office Building," end quote. "New York Times, March 6th, 1997.

"In 1896, President Grover Cleveland's administration issued an opinion on the meaning of the word 'receive' under the predecessor to the modern statutes limiting political activities by the Federal employees and the interpretation that has been followed consistently through reenactments and codifications of these statutes over the past 100 years. Attorney General Judson Harman wrote in 1896 in a published opinion at 21 Opinions of Attorney General 298," quote, "The place where he, bracket, the Federal employee, end bracket, received the contribution is immaterial" because, quote, "possession which simply constitutes the taker a mere custodian without right on his own behalf or of that of others does not violate the act.

"The vitality of Harman's opinion has not diminished over the years. The word 'receive' and the phrase 'receive a political contribution' in 5 U.S.C. Section 7323(a)(2) and the phrase 'receive any contribution' in 18 U.S.C. Section 607(a) is defined today by Federal regulations as follows: '*Receive* means to come into possession of something from a person *officially on behalf of* a candidate, a campaign, a political party, or a partisan political group.' 5 CFR section 734.101, 1996. To further drive the point home, the Office of Personnel Management, the agency that promulgates these regulations, has recently addressed this very issue in both its comments to interim regulations on the subject in 1994 and its adoption of final regulations a mere 8 months ago stating," quote, "Ministerial activities which precede or follow the *official acceptance and receipt,* such as handling, disbursing, or accounting for contributions are not covered under the definition of 'accept' and 'receive.' As Attorney General Harman stated over a century ago, where an employee's relation to the transaction is 'purely mechanical,'" and that's in quotes, "the employee has not acted improperly or illegally regardless of whether he or she is in a Federal building."

There are several additional paragraphs. That's my opinion with regard—and analysis with regard to this particular issue. And I just wanted the committee to be aware that there is substantial authority for the fact that these circumstances would not give rise to a criminal violation or a civil violation of any statute or regulation on the part of my client.

[The letter referred to follows:]

1800 M Street, N.W.
Washington, D.C. 20036-5869
202-467-7000
Fax: 202-467-7176
Fed. Tax ID 23-0891050

Morgan, Lewis
& Bockius LLP
COUNSELORS AT LAW

March 6, 1997

Joseph E. diGenova, Esquire
diGenova & Toensing
901 15th Street, N.W.
Suite 430
Washington, D.C. 20005

Dear Joe:

Your off-the-cuff opinion on the Hatch Act given to the national media is one hundred and one years out of date. You are quoted as taking issue with my client's handling of a political contribution to the Democratic National Committee calling it "totally improper" because in your words, "[i]t is illegal to receive federal campaign funds on property at The White House or at the Executive Office Building." (New York Times, March 6, 1997). In 1896 President Grover Cleveland's administration issued an opinion on the meaning of the word "receive" under the predecessor to the modern statutes limiting political activities by federal employees and that interpretation has been followed consistently through reenactments and codifications of these statutes over the past 100 years. Attorney General Judson Harmon wrote in 1896 in a published opinion at 21 Op. Att'y Gen. 298, "The place where he [the federal employee] received the contribution, . . . is immaterial," because "possession which simply constitutes the taker a mere custodian without right on his own behalf or that of others" does not violate the Act.

The vitality of Harmon's opinion has not diminished over the years. The word "receive" in the phrase "receive a political contribution" in 5 U.S.C. § 7323(a)(2) and the phrase "receive any contribution" in 18 U.S.C. § 607(a) is defined today by federal regulations as follows: "*Receive* means to come into possession of something from a person officially on behalf of a candidate, a campaign, a political party, or a partisan political group." 5 CFR § 734.101 (1996). (Underlining added). To further drive the point home, the Office of Personnel Management, the agency that promulgates these regulations,

has recently addressed this very issue in both its comments to interim regulations on the subject in 1994 and its adoption of final regulations a mere eight months ago stating, "Ministerial activities which precede or follow the official acceptance and receipt, such as handling, disbursing, or accounting for contributions are not covered under the definitions of 'accept' and 'receive.' " 59 Fed. Reg. 184 (1994), at 48766 (underlining added); see also 61 Fed. Reg. 130 (1996), at 35089. As Attorney General Harmon stated over a century ago, where an employee's relation to the transaction is "purely mechanical" the employee has not acted improperly or illegally regardless of whether he or she is in a federal building.

This agency interpretation of the scope of the prohibitions against federal employees accepting or receiving political contributions is legally binding. It is the basis for the advice White House Counsel gives to White House staff, if political contributions come into the White House by mail or otherwise. Even though the presentation of political checks at the White House is not encouraged, under the law it is appropriate for White House staff to forward them to the appropriate agency as was done here. My client properly handled a situation which arose unexpectedly in her office at the Old Executive Office Building, and I take strong exception to your suggestion to the contrary.

I would strongly suggest that you immediately retract your statements about my client and that in the future you consult with the agency administering these statutes before you make another statement that irreparably damages her reputation. I await your speedy reply.

Sincerely,

Edward S.G. Dennis, Jr.

ESGD/ljr

Mr. BURTON. The gentleman's statement and the correspondence you alluded to you will be made a part of the record.

Mr. Kucinich.

Mr. KUCINICH. Thank you very much, Mr. Chairman.

First I would like to submit something for the record. This is a memo for all Members' offices and the employees of the House of Representatives, dated April 25, 1997, and the subject is Rules Governing Solicitation by Members, Officers and Employees in General.

[The memo referred to follows:]

JAMES V. HANSEN, UTAH
CHAIRMAN

13-133

HOWARD L. BERMAN, CALIFORNIA
RANKING DEMOCRATIC MEMBER
SUITE HT 2, THE CAPITOL
(202) 225-7103

ONE HUNDRED FIFTH CONGRESS

U.S. House of Representatives

COMMITTEE ON STANDARDS OF
OFFICIAL CONDUCT

Washington, DC 20515–6328

April 25, 1997

MEMORANDUM FOR ALL MEMBERS, OFFICERS AND EMPLOYEES

FROM: **Committee on Standards of Official Conduct** J.V.H.
James V. Hansen, Chairman
Howard L. Berman, Ranking Democratic Member HLB

SUBJECT: Rules Governing (1) Solicitation by Members, Officers and Employees in General, and (2) Political Fundraising Activity in House Offices

Introduction

The purpose of this memorandum is to reiterate and elaborate on the rules governing the conduct of Members, officers and employees of the House in two areas:

- ***solicitation*** of others -- *i.e.*, asking anyone for money or anything of value -- including for non-political purposes, and
- soliciting or receiving ***political contributions*** in the House office buildings, the Capitol, or district offices.

Both of these matters are discussed in the *House Ethics Manual*, 102d Cong., 2d Sess. (April 1992): solicitation in general on pp. 50-52 and 64-65, and political fundraising activity in House offices on p. 285. Both of these matters are also addressed in an advisory memorandum which the Committee issued on April 4, 1995, which announced certain new restrictions on solicitation. Copies of both the *Manual* and the April 1995 advisory memorandum are available from the Committee office.

Because of recent items in the news media on the legality and propriety of political fundraising activity in Federal offices, the Committee believes this is an opportune time to set out the standards which apply in the House. The Committee also believes that this is an appropriate time to remind Members and staff of the general law governing solicitation by them, including solicitations made for non-political purposes.

The Honorable Henry A. Waxman
2204 Rayburn HOB
Washington, DC 20515-0529

ATTENTION: CHIEF OF STAFF

Solicitation by Members, Officers and Employees

General prohibition against solicitation. Under a provision of the Ethics Reform Act of 1989, House Members, officers and employees are generally *prohibited* from asking for anything of value from a broad range of persons: specifically, anyone who seeks official action from the House, does business with the House, or has interests which may be substantially affected by the performance of official duties. Under the statute, which is codified at 5 U.S.C. § 7353, the only solicitations of such persons which *are* permissible are those sanctioned by this Committee.[1]

The terms of the prohibition are very broad. The provision applies to the solicitation of not only money, but "anything of value". In addition, the prohibition covers solicitations of things for the personal benefit of the Member, officer or employee, as well as things which involve no personal benefit. Thus, as the *House Ethics Manual* notes (at p. 52), the statute bars, for example, a staffer from asking a lobbyist for free tickets to a sporting event, or from asking lobbyists to help pay for a party to be given in honor of a Member. While the examples used in the *Manual* refer to solicitations of lobbyists, it would be equally impermissible to make the same requests of non-lobbyist officials of a corporation, association or other such entity. A solicitation made by another person in the name of a Member, officer or employee, and with the knowledge and acquiescence of that official, will likely be deemed a solicitation by that official.

Prohibition does not apply to political solicitations. Legislative materials concerning 5 U.S.C. § 7353 state that the statutory prohibition does *not* apply to the solicitation of political contributions,[2] and the Committee has expressly recognized that the statute does not bar political solicitations. However, a number of other provisions of law impose restrictions on political solicitations by Members, officers and employees, and one of the major sets of restrictions – regarding solicitation in Federal offices – is discussed in detail below. Other restrictions on political solicitations are set out on pp. 3-5 of the Committee's advisory memorandum of April 4, 1995.

Exception for charitable fundraising. In 1990 the Committee determined, pursuant to its authority under 5 U.S.C. § 7353, that Members, officers and employees *may* solicit on behalf of charitable organizations qualified under § 170(c) of the Internal Revenue Code, subject to certain restrictions. Under this determination, solicitations on behalf of established charitable or educational organizations are generally permissible without any further action by the Committee.

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[1]The statute also prohibits the *acceptance* of anything of value from such persons except as the Committee allows. This provision of the statute is implemented by the House gift rule (House Rule 51), the interpretation and enforcement of which are the Committee's responsibility.

[2]136 Cong. Rec. H1647 (daily ed. April 24, 1990) (regarding technical corrections to the Ethics Reform Act of 1989).

The major restrictions on such solicitations are that no official resources may be used in making them, no official endorsement by the House of Representatives may be implied,[3] and no direct personal benefit may result to the soliciting official. In 1995 the Committee established an additional restriction regarding organizations established or controlled by Members of Congress: a solicitation may not be made for any such organization, regardless of its tax status, unless the organization's principal activities are unrelated to a Member's official duties. Finally, under a provision of the gift rule, registered lobbyists and registrants under the Foreign Agents Registration Act may not be solicited, except as part of a mass mailing or other solicitation directed to a broad category of persons.[4]

This exception for charitable solicitations is the only ***general*** exception the Committee has issued. It is ***not*** permissible for a Member, officer or employee to make a solicitation on behalf of anyone other than a charity without the prior written approval of the Committee. There are certain types of solicitation which the Committee, upon request, will generally approve, subject to the same restrictions which apply to charitable solicitations: for example, solicitations on behalf of persons who are in need of assistance because of a catastrophic injury or natural disaster, solicitations for tax-exempt organizations which are not charities, and for the Congressional Arts Competition in one's district.

Political Fundraising Activity in House Offices

There has been much discussion in the media recently regarding a criminal statute, 18 U.S.C. § 607, which generally prohibits *soliciting* political contributions in federal offices. That statute also generally prohibits *receiving* contributions in Federal offices, although, as detailed below, some exception is made for contributions received in Congressional offices.

Much of the recent discussion has been in the form of a debate on whether various activities violate 18 U.S.C. § 607. House Members and staff should be aware, however, that they are subject not only to the criminal statute, but also to the standards enunciated and enforced by this Committee. While there may be uncertainty regarding the scope of the criminal statute, the standards enunciated by the Committee regarding political fundraising in House offices are quite specific, and quite restrictive.

While those standards are based in part on the provisions of 18 U.S.C. § 607, they are based as well on several other provisions of law: specifically, the regulations of the House Office Building Commission, which govern the use of House facilities; 31 U.S.C. § 1301, which requires that official resources and allowances be used only for official activities, and

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[3]In this regard, solicitations may not bear official letterhead, the wording "Congress of the United States", "House of Representatives", or "official business", or the Great Seal of the United States, pursuant to clause 11 of House Rule 43 (the Code of Official Conduct) and 18 U.S.C. § 713.

[4]House Rule 51, clause 3(b).

regulations issued by the House Oversight Committee which reflect this same requirement; and clause 1 of House Rule 43, which requires that Members and staff conduct themselves at all times in a manner which reflects creditably on the House of Representatives. The standards regarding political fundraising activity in House offices are as follows.

Soliciting Political Contributions. Regarding, first, the matter of soliciting political contributions, the basic rule is straightforward: ***Members and staff may not solicit political contributions in their office or elsewhere in the House buildings, whether in person, over the telephone, or otherwise.*** This rule applies with regard to the Capitol, the House office buildings, and district offices.

The rule bars **all** political solicitations in these House buildings. Thus a telephone solicitation would not be permissible merely because, for example, the call is billed to the credit card of a political organization or to an outside telephone number, or it is made using a cellphone in the hallway. Similarly, where a House Member or employee makes solicitation calls somewhere else, such as at one of the campaign committee offices, and has to leave a message, the individual should not leave his or her House office number for the return call.

Receiving Political Contributions. The rule on receiving political contributions is equally straightforward: ***Members and staff may not request that a contribution be sent or delivered to their House office, and may not assent to the sending or delivery of a contribution to their House office.*** Thus a Member or employee should never authorize a solicitation for political contributions (or, for that matter, any other political communication) which uses a House office address. Furthermore, if a Member or staffer learns that an individual who is going to be visiting the office intends to offer a contribution during his or her visit, the individual must be told that the contribution cannot be accepted here, and arrangements for delivery of the contribution elsewhere must be made.

However, if someone *unexpectedly* offers a contribution during a visit to a House office, or if someone *unexpectedly* mails or delivers a contribution to the office, the contribution *can* be accepted, provided that it is forwarded to the political committee within seven days of receipt. The criminal statute, 18 U.S.C. § 607, includes a provision which specifically permits acceptance and forwarding of a contribution received in a Congressional office, provided that the contribution was not solicited in any manner which directs the contributor to mail or deliver a contribution to any Federal office. Please note, however, that an envelope forwarding a contribution may not be sent under the frank, and thus the forwarding must be done using personal or campaign stationery and stamps.

Additional Considerations. Two additional points should be made here, and these apply to both soliciting and receiving political contributions. **First**, the rules set forth above to not bar *Members* from soliciting or receiving contributions from *other Members* in the House buildings. Please note, however, that one of the new House rules approved in January prohibits the

knowing distribution of campaign contributions on the House floor, in the Speaker's Lobby, and in the cloakrooms.[5]

Second, these rules are not limited to contributions for Congressional campaigns. They apply to the solicitation and receipt of all political contributions, including those for campaigns for state or local office.

Any questions on the above matters, and any requests for copies of the *House Ethics Manual* or the Committee's advisory memorandum of April 4, 1995, should be directed to the Committee's Office of Advice and Education at 5-3787.

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[5]House Rule 32, clause 5.

UNITED STATES CODE ANNOTATED
TITLE 18. CRIMES AND CRIMINAL PROCEDURE
PART I--CRIMES
CHAPTER 29--ELECTIONS AND POLITICAL ACTIVITIES

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Current through P.L. 105-22, approved 6-27-97

§ 607. Place of solicitation

(a) It shall be unlawful for any person to solicit or receive any contribution within the meaning of section 301(8) of the Federal Election Campaign Act of 1971 in any room or building occupied in the discharge of official duties by any person mentioned in section 603, or in any navy yard, fort, or arsenal. Any person who violates this section shall be fined under this title or imprisoned not more than three years, or both.

(b) The prohibition in subsection (a) shall not apply to the receipt of contributions by persons on the staff of a Senator or Representative in, or Delegate or Resident Commissioner to, the Congress, provided, that such contributions have not been solicited in any manner which directs the contributor to mail or deliver a contribution to any room, building, or other facility referred to in subsection (a), and provided that such contributions are transferred within seven days of receipt to a political committee within the meaning of section 302(e) of the Federal Election Campaign Act of 1971.

CREDIT(S)

1976 Main Volume

(June 25, 1948, c. 645, 62 Stat. 722.)

1997 Electronic Update

(As amended Jan. 8, 1980, Pub.L. 96-187, Title II, § 201(a)(5), 93 Stat. 1367; Sept. 13, 1994, Pub.L. 103-322, Title XXXIII, § 330016(1)(K), 108 Stat. 2147.)

<General Materials (GM) - References, Annotations, or Tables>

HISTORICAL AND STATUTORY NOTES

Reviser's Note

Based on Title 18, U.S.C., 1940 ed., §§ 211, 212 (Mar. 4, 1909, c. 321, §§ 121, 122, 35 Stat. 1110).

This section consolidates §§ 211 and 212 of Title 18, U.S.C., 1940 ed.

This section was expanded to embrace all officers or persons acting on behalf of any independent agencies or Government-owned or controlled corporations by inserting words "or any department or agency thereof." (See definitive § 6, and reviser's note under § 201 of this title.)

Changes were made in phraseology.

References in Text

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Sections 301(8) and 302(e) of the Federal Election Campaign Act of 1971, referred to in text, are classified to sections 431(8) and 432(e), respectively, of Title 2, The Congress.

1994 Amendments

Subsec. (a). Pub.L. 103-322, § 330016(1)(K), substituted "under this title" for "not more than $5,000" wherever appearing.

1980 Amendment

Pub.L. 96-187 substituted provisions relating to the place of solicitation for provisions relating to the making of political contributions.

Effective Date of 1980 Amendment

Amendment by Pub.L. 96-187 effective on Jan. 8, 1980, see section 301(a) of Pub.L. 96-187, set out as a note under section 431 of Title 2, The Congress.

Legislative History

For legislative history and purpose of Pub.L. 96-187, see 1979 U.S. Code Cong. and Adm. News, p. 2860. See, also, Pub.L. 103-322, 1994 U.S. Code Cong. and Adm. News, p. 1801.

LIBRARY REFERENCES

Elections ⚷309.

C.J.S. Elections §§ 324, 334.

NOTES OF DECISIONS

Discharge of official duties 1

1. Discharge of official duties

The use of the White House Family Dining Room for a luncheon for about 20 Democratic Party donors and fundraisers falls within the private residence exception implicit in this section's reference to occupation "in the discharge of official duties". 1979 (Counsel-Inf. Op.) 3 Op.O.L.C. 31.

18 USCA § 607

18 U.S.C.A. § 607

END OF DOCUMENT

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UNITED STATES CODE ANNOTATED
TITLE 5. GOVERNMENT ORGANIZATION AND EMPLOYEES
PART III--EMPLOYEES
SUBPART F--LABOR-MANAGEMENT AND EMPLOYEE RELATIONS
CHAPTER 73--SUITABILITY, SECURITY, AND CONDUCT
SUBCHAPTER III--POLITICAL ACTIVITIES

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Current through P.L. 105-22, approved 6-27-97

§ 7323. Political activity authorized; prohibitions

(a) Subject to the provisions of subsection (b), an employee may take an active part in political management or in political campaigns, except an employee may not--

(1) use his official authority or influence for the purpose of interfering with or affecting the result of an election;

(2) knowingly solicit, accept, or receive a political contribution from any person, unless such person is--

(A) a member of the same Federal labor organization as defined under section 7103(4) of this title or a Federal employee organization which as of the date of enactment of the Hatch Act Reform Amendments of 1993 had a multicandidate political committee (as defined under section 315(a)(4) of the Federal Election Campaign Act of 1971 (2 U.S.C. 441a(a)(4)));

(B) not a subordinate employee; and

(C) the solicitation is for a contribution to the multicandidate political committee (as defined under section 315(a)(4) of the Federal Election Campaign Act of 1971 (2 U.S.C. 441a(a)(4))) of such Federal labor organization as defined under section 7103(4) of this title or a Federal employee organization which as of the date of the enactment of the Hatch Act Reform Amendments of 1993 had a multicandidate political committee (as defined under section 315(a)(4) of the Federal Election Campaign Act of 1971 (2 U.S.C. 441a(a)(4))); or

(3) run for the nomination or as a candidate for election to a partisan political office; or

(4) knowingly solicit or discourage the participation in any political activity of any person who--

(A) has an application for any compensation, grant, contract, ruling, license, permit, or certificate pending before the employing office of such employee; or

(B) is the subject of or a participant in an ongoing audit, investigation, or enforcement action being carried out by the employing office of such employee.

(b)(1) An employee of the Federal Election Commission (except one appointed by the President, by and with the advice and consent of the Senate), may not request or receive from, or give to, an employee, a Member of Congress, or an officer of a uniformed service a political contribution.

(2)(A) No employee described under subparagraph (B) (except one appointed by the President, by and with the advice and consent of the Senate), may take an active part in political management or political campaigns.

(B) The provisions of subparagraph (A) shall apply to--

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(i) an employee of--

(I) the Federal Election Commission;

(II) the Federal Bureau of Investigation;

(III) the Secret Service;

(IV) the Central Intelligence Agency;

(V) the National Security Council;

(VI) the National Security Agency;

(VII) the Defense Intelligence Agency;

(VIII) the Merit Systems Protection Board;

(IX) the Office of Special Counsel;

(X) the Office of Criminal Investigation of the Internal Revenue Service;

(XI) the Office of Investigative Programs of the United States Customs Service;

(XII) the Office of Law Enforcement of the Bureau of Alcohol, Tobacco, and Firearms; or

(XIII) the National Imagery and Mapping Agency; or

(ii) a person employed in a position described under section 3132(a)(4), 5372, or 5372a of title 5, United States Code.

(3) No employee of the Criminal Division of the Department of Justice (except one appointed by the President, by and with the advice and consent of the Senate), may take an active part in political management or political campaigns.

(4) For purposes of this subsection, the term "active part in political management or in a political campaign" means those acts of political management or political campaigning which were prohibited for employees of the competitive service before July 19, 1940, by determinations of the Civil Service Commission under the rules prescribed by the President.

(c) An employee retains the right to vote as he chooses and to express his opinion on political subjects and candidates.

CREDIT(S)

1996 Main Volume

(Added Pub.L. 103-94, § 2(a), Oct. 6, 1993, 107 Stat. 1002, and amended Pub.L. 103-359, Title V, § 501(k), Oct. 14, 1994, 108 Stat. 3430.)

1997 Electronic Update

(As amended Pub.L. 104-201, Div. A, Title XI, § 1122(a)(1), Sept. 23, 1996, 110 Stat. 2687.)

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<General Materials (GM) - References, Annotations, or Tables>

HISTORICAL AND STATUTORY NOTES

Revision Notes and Legislative Reports

1993 Acts. Senate Report No. 103-57 and Statement by President, see 1993 U.S. Code Cong. and Adm. News, p. 1802.

1994 Acts. House Report No. 103-541 and House Conference Report No. 103-753, see 1994 U.S. Code Cong. and Adm. News, p. 2703.

1996 Acts. House Report No. 104-563 and House Conference Report No. 104-724, see 1996 U.S. Code Cong. and Adm. News, p. 2948.

References in Text

The date of enactment of the Hatch Act Reform Amendments of 1993, referred to in subsec. (a)(2)(A), (C), is Oct. 6, 1993, the date of enactment of Pub.L. 103-94.

Amendments

1996 Amendments. Subsec. (b)(2)(B)(i)(XIII). Pub.L. 104-201, § 1122(a)(1), substituted "National Imagery and Mapping Agency" for "Central Imagery Office".

1994 Amendments. Subsec. (b)(2)(B)(i)(XIII). Pub.L. 103-359, § 501(k), added subcl. (XIII).

Effective Dates

1993 Acts. Section effective 120 days after Oct. 6, 1993, and not to affect proceedings with respect to charges filed on or before 120 days after Oct. 6, 1993, and orders to be issued in such proceedings and appeals to be taken therefrom as if Pub.L. 103-94 had not been enacted, see section 12 of Pub.L. 103-94, set out as a note under section 7321 of this title.

Savings Provisions

Amendment or repeal of any provision of law made by Pub.L. 103-94 not to release or extinguish any penalty, forfeiture or liability incurred under such provision, and such provision to be treated as remaining in force for purpose of any proceeding or action for enforcement of such penalty, forfeiture or liability, see section 12(b) of Pub.L. 103-94, set out as a note under section 7321 of this title.

Prior Provisions

A prior section 7323, Pub.L. 89-554, Sept. 6, 1966, 80 Stat. 525, which prohibited employee in Executive agency from requesting, receiving from, or giving to, an employee, a Member of Congress, or an officer of a uniformed service, a thing of value for political purposes, and provided for removal from service of employee for violation, was omitted in the general revision of this subchapter by section 2(a) of Pub.L. 103-94.

CROSS REFERENCES

Applicability of this section to--
Federal employees making political contributions, see 18 USCA § 603.
Federal employees' solicitation of political contributions, see 18 USCA § 602.

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Political activities prohibited by personnel management system of General Accounting Office, see 31 USCA § 732.

LIBRARY REFERENCES

Administrative Law

Federal Election Commission (FEC), standards of conduct, see 11 CFR Part 7.

Political activity, see West's Federal Practice Manual § 6404.5.

Political affiliation of federal employee, see West's Federal Practice Manual § 15805.

American Digest System

Authority and powers of federal officers, agents, and employees in general, see United States ⚷40.

Regulation of public officers and employees in general; political activities, see Officers and Public Employees ⚷11 et seq., 18, 19, 106 et seq.

Encyclopedias

Authority and powers of federal officers, agents, and employees in general, see C.J.S. United States § 38 et seq.

Regulation of public officers and employees in general; political activities, see C.J.S. Officers and Public Employees §§ 89 et seq., 90, 190 et seq., 193 et seq.

5 U.S.C.A. § 7323

5 USCA § 7323

END OF DOCUMENT

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Mr. KUCINICH. In this—and I cite from this for the purpose of bringing some clarity to this moment. Under the topic of receiving political contributions, and I quote: "However, if someone *unexpectedly* offers a contribution during a visit to a House office, or someone *unexpectedly* mails or delivers a contribution to the office, the contribution *can* be accepted, provided that it is forwarded to the political committee within 7 days of receipt. The criminal statute, 18 U.S.C. 607 includes a provision which specifically permits acceptance and forwarding of a contribution received in a Congressional office, provided that the contribution was not solicited in any manner which directs a contributor to mail or deliver a contribution in a Federal office." Then it goes on to talk about the implications of the frank.

I would like to submit this into the record. I would also like to submit a copy of 18 U.S.C. 607, which spells out the circumstances under which someone in effect can be a custodian, but passing it along, they're not lawfully—they're not unlawfully receiving it. And also, an addendum which is the Hatch Act which, in effect, would qualify the conditions under which someone would have temporary custodianship of a contribution.

Mr. COX. Would the gentleman yield? Is the gentleman aware that that's not the law that applies to the White House?

Mr. KUCINICH. I am aware furthermore that in exhibit 153–4, the White House in receipt of campaign contributions in the White House, spells out a policy of passing along such contributions. I'm going to continue if I may.

I furthermore want to point out and caution members of the committee about implying that Ms. Williams broke any laws in regard to this, since it's very clear that there are policy statements and ethics statements which suggest that there is one standard that has already been applied to the legislative branch and a policy through an exhibit that implies that there is an equivalent in the administrative branch.

Furthermore, on another issue, the chairman of this committee said on record that the check from Mr. Chung came from the Chinese Government and was therefore illegal. But I would submit respectfully that the Chair is not correct.

On March 6, 1995, Mr. Chung received a $150,000 wire transfer into his account which had only about $9,000 in it. On March 19, 1995, he wrote a $50,000 DNC check that he handed to Maggie Williams.

There is nothing illegal with this transaction as the money he received by wire was his own earned money. In fact, the wire transfer record itself states that it was a payment for goods from the Haomen Group. The Haomen Group is a Chinese beer and soda company. And Mr. Chung escorted an executive to that company through the White House in December 1994, and was reportedly trying to market the company's beer in the United States.

The wire transfer came from the Chase Manhattan Bank in New York City. Now the Senate released the underlying documents about the wire transfer to the press which then reported the facts. For instance, the July 18 articles in both the L.A. Times and in Newsday fully report the facts about the March 6 wire transfer. Quoting from the L.A. Times, "a partial review of Chung's personal

financial records shows that contrary to GOP assertions, Chung had in excess of $300,000 in various bank accounts at the time, indicating that he could have covered his $50,000 contributions without Chinese funds."

So there are two points here. One of which is that is—there is no suggestion that Ms. Williams violated the law by taking in and then passing along, according to proper procedures, that check that Mr. Chung gave her. Second, there is no evidence that Mr. Chung, in fact, could not have covered that contribution with his own money.

Now, we do have evidence of the ubiquitousness of Mr. Chung. That we have evidence of. What we have here is more or less the return of Forrest Gump, this time as an ethic businessman. He is everywhere. He is with Republicans. He's with Democrats. He's at the Statehouse. He's at the White House. But nothing says that he should be going to the big house.

Mr. BURTON. Does the gentleman yield back the balance of his time?

Mr. KUCINICH. I yield my time back to Mr. Fattah, if he wishes to continue that point.

Mr. FATTAH. No, I just want in addition to, in response to Congressman Cox's, I think, very appropriate question, that that does only relate to the House's rules. But there's a Senate rule that I would also like to put in the record which is quite similar and is also one that governs the White House.

In addition, the Office of Personnel Management, in its regulations which governs all Federal employees, says essentially the same thing; and that is, that administrative activities which precede or follow the acceptance and receipt, such as handling, disbursing, accounting for contributions, are not covered under the definition of accept and receive.

So I think that what we need to be clear about is that clearly, based on all of the accepted norms, the fact that she received a check and sent it over to the DNC is not something that is dissimilar to what happens throughout the Federal Government and is generally accepted as a normal part of doing business here. And for people to try to make that into a crime is in of itself quite offensive, and it should be to the majority even on this committee.

Mr. KUCINICH. Reclaiming my time. Thank you, Mr. Fattah. You helped to elucidate that further.

Mr. BURTON. The gentleman's time has expired. Mr. Horn.

Mr. HORN. I will be glad to yield the chairman such time as he needs.

Mr. BURTON. Let me just take a second here. One of the things that we're trying to find out is, were illegal foreign contributions made to either party. In this particular case, we're talking about the Democrat National Committee. What do these transactions mean?

Now, we could sit here and argue about whether or not Mr. Chung had funds in one bank account or another and on and on and on. But we honestly don't know. We don't know if this was a conduit contribution. Was that $150,000 legitimate income that was earned by Mr. Chung's business? We don't have the answers yet. We hope to get those answers from Mr. Chung tomorrow.

We're going to be talking to him about that, taking a deposition in the morning before the hearing. But the fact of the matter is the appearance, the appearance is one that needs to be investigated very thoroughly. And that's what we're trying to do.

Mr. Horn.

Mr. HORN. I thank the gentleman for yielding.

Mr. COX. Would the gentleman from California yield? Would the gentleman yield?

Mr. HORN. I will.

Mr. COX. I thank the gentleman.

Mr. Chairman, it's also important for us to focus on the fact that while surely we would empathize with anyone who unwittingly received a campaign check and tried to do the right thing with it, what we've got here is, first, consistent long-standing advice of the White House Counsel's Office, the same memoranda that we used to circulate when I worked in the White House Counsel's Office, that makes it clear to all the White House office employees and certainly who run those offices such as the Chief of Staff of the First Lady that you cannot accept contributions.

We have a Chief of Staff who then did not consult with the White House Counsel's Office; neither did she consult with the National Security Council concerning people that I take it were complete strangers.

I'll ask you on the record, Ms. Williams, were the people—we're not so much concerned frankly about Johnny Chung as we are about what's going on behind him. And therefore, these pictures that we're looking at of Johnny Chung with various people or with the President of the United States are not so troublesome as the fact that he didn't even go to the main event which he apparently purchased for his People's Republic of China visitors; but rather we had representatives of the China Petrochemical Corp., COSCO, CITIC, and so on, none of whom I would classify as a political groupie, and none of whom I would say is beyond engaging in policy discussions, walking right in and having meetings for the First Lady, the President of the United States and so on.

But let me ask you, because we left on this before, whether or not the people who you arranged to meet with President Clinton on that Saturday on March 11 to watch him give his radio address and so on, was any of those people known to you prior to the request by Mr. Chung that they would be permitted these meetings?

Ms. WILLIAMS. I did not arrange for Mr. Chung to go to the radio address or any of his associates to go to the radio address or meet with the President.

Mr. COX. Did you meet with these people yourself?

Ms. WILLIAMS. I didn't meet with them. I was introduced to them, as I said before, and I——

Mr. COX. You were introduced to them.

Ms. WILLIAMS. They didn't speak any English. I——

Mr. COX. Were any of these people known to you before?

Ms. WILLIAMS. No.

Mr. COX. So they were complete strangers.

Ms. WILLIAMS. Yes, they were.

Mr. COX. And I think part of the concern here is that exactly contemporaneously with the exchange of significant funds, $50,000,

complete strangers are given extraordinary favors by the White House. That is a different issue. And that is—it is that sort of total picture that makes us focus on why this money is—changes hands inside the White House. But these people to you were total strangers.

On April 7th, the National Security Council opined that Mr. Chung should be treated with suspicion and that he was a hustler. Do you know how many times he was admitted to the White House after that advice was given on April 7?

Ms. WILLIAMS. I do not know that. But you—that advice was not given to me.

Mr. COX. So you never heard from the National Security Council about Mr. Chung at all?

Ms. WILLIAMS. No, I didn't. In fact, the only contact I ever had with the National Security Council with respect to Mr. Chung that I recall was having spoken to someone a long time after the radio address, when Mr. Chung was trying to get his pictures, and he wrote me a note. So I was not aware of the National Security Council—I don't know if it was a memo or whatever on April 7 or whatever the date was. Sorry.

Mr. COX. Let me ask a question about these complete strangers, because it's been suggested that Johnny Chung is a sort of wealthy Mr. Magoo who is just kind of aimlessly bumping into people and showing up places. Would you characterize the vice president of the China International Trust and Investment Corp., as a political groupie who was uninterested in discussing any policy?

Ms. WILLIAMS. I don't know him.

Mr. COX. But do you think that someone who occupies that position is likely to be a naive waif?

Ms. WILLIAMS. I don't know him to say.

Mr. COX. Or the vice president of China Petrochemical, does that sound like the kind of person who is just interested in being a political groupie?

Ms. WILLIAMS. Well, I don't know him. And, boy, you know, Washington is full of surprises. People you least expect to be one way are another way, so I'm hesitant to say——

Mr. COX. Just amazing.

Ms. WILLIAMS [continuing]. Just based on the title.

Mr. COX. It's quite a surprise.

Mr. BURTON. The gentleman's time has expired. Mr. Waxman.

Mr. WAXMAN. Ms. Williams, I think we're sinking to new lows on this committee. I'm just astounded at the last questions that you had from Mr. Cox when he said that there was an advisory from the National Security Council. There was not an advisory from the National Security Council. It was a memo by someone at the National Security Council when questioned whether he should give Mr. Chung and his guests photos. He said extraordinary reward that was given to Mr. Chung. Well that was the extraordinary reward, whether he should give his photos. They were a little nervous about this guy. He was a hustler. And that's what Mr. Suettinger, I think is his name, said in his memo. It wasn't an advisory. It wasn't an all purpose alert.

Second, I think we reached an all time low when people start talking about the law. You would think that lawyers would have

some sense that they should be honest about it. The law is very clear. If someone unexpectedly offers a contribution or unexpectedly mails or delivers a contribution, the contribution can be accepted provided it's forwarded to the political committee within 7 days of receipt. That's the law.

What is going on here, and I suspect you already have figured it out, is Republicans have no indication that you solicited any contribution. They have no basis for saying that you violated any law, that you have committed any illegality. What you're in the process of being is, quote, "slimed." That's what's happening here today. And it really is a new low.

The chairman says we're talking about foreign contributions. Well, no one has been able to say that it was a foreign contribution involved here. Maybe there was, but all we know is that Mr. Chung wrote a check and then received a wire transfer from a foreign bank. A foreign bank doesn't mean it's a foreign contribution. And if it's a foreign payment through a foreign bank, a payment for some business activity of his, that doesn't make it a foreign contribution.

You know, the thing is this, this is supposed to be an investigative committee. Before an accusation is made, those who are doing an investigation should find out the facts. What we have in this committee is a pattern of allegations before they know the facts. That's what happened when the chairman alluded to his claim that the tapes of the White House coffees were altered. He still has no way—no basis for making that statement. You don't reach a conclusion before you get the facts unless you're doing it for political purposes. And of course I think that's what's really going on.

If we have information about a foreign contribution, let's get the information out there before the allegation is made. That's the responsible way for investigators to handle things.

Just for the record, and people should know this, because there are people who watch this hearing on C–SPAN, this committee has issued 600 subpoenas and requests for information, all directed at Democrats. And they've had 10 requests for information and subpoenas where it might pertain to possible Republican wrongdoing.

The chairman says he's going to do his level best to know what the facts are, no matter where they may lead, on either side of the aisle. Well, I'm pleased to hear he said he's going to subpoena Triad. I haven't seen a subpoena to be issued by our committee at all.

And I want to make the point for the record that an excerpt from the 1994 interim regulations that say ministerial activities regarding contributions like the one you had are perfectly legal. I'm going to put that in the record. These are the regulations for the Office of Personnel Management. And Mr. Cox, who used to work in the White House, said don't you know the rule is different in the White House. Well, I have now the information it's not different in the White House.

[The information referred to follows:]

FINAL RULE - - HATCH ACT REGS

(2), provide written notice of disqualification to his supervisor and counselor upon determining that he will not participate in the matter.

(b) *Disqualification to ensure impartiality.* A DOE employee who is required, in accordance with 5 CFR 2635.502(e), to disqualify himself from participation in a particular matter involving specific parties to which he has been assigned shall, notwithstanding the guidance in 5 CFR 2635.502(e)(1) and (2), provide written notice of disqualification to his supervisor and counselor upon determining that he will not participate in the matter.

(c) *Disqualification from matter effecting prospective employers.* A DOE employee who is required, in accordance with 5 CFR 2635.604(a), to disqualify himself from participation in a particular matter to which he has been assigned shall, notwithstanding the guidance in 5 CFR 2635.604(b) and (c), provide written notice of disqualification to his supervisor and counselor upon determining that he will not participate in the matter.

(d) *Withdrawal of notification.* A DOE employee may withdraw written notice under paragraphs (a), (b), or (c) of this section upon deciding that disqualification from participation in the matter is no longer required. A withdrawal of notification shall be in writing and provided to the employee's supervisor and counselor.

§ 3301.103 Prior approval for outside employment.

(a) *Prior approval requirement.* Before engaging in any outside employment, whether or not for compensation, an employee, other than a special Government employee, must obtain written approval of his immediate supervisor and the Counselor. Requests for approval shall include the name of the person; group or organization for whom the work is to be performed; the type of work to be performed; and the proposed hours of work and approximate dates of employment.

(b) *Standard for approval.* Approval shall be granted unless there is a determination that the outside employment is expected to involve conduct prohibited by statute or Federal regulation, including 5 CFR part 2635.

(c) *Definition of employment.* For purposes of this section, "employment" means any form of non-Federal employment or business relationship involving the provision of personal services by the employee. It includes but is not limited to personal services as an officer, director, trustee, general partner, agent, attorney, consultant, contractor, employee, advisor, or teacher. It does not include participating in the activities of a nonprofit, charitable, religious, public service or civic organization, unless such activities involve the provision of professional services or are for compensation.

TITLE 10—ENERGY

Chapter X—Department of Energy (General Provisions)

2. 10 CFR part 1010 is revised to read as follows:

PART 1010—CONDUCT OF EMPLOYEES

Sec.
1010.101 General.
1010.102 Cross-reference to employee ethical conduct standards and financial disclosure regulations.
1010.103 Reporting wrongdoing.
1010.104 Cooperation with the Inspector General.
1010.105 Conflict of interest waiver.

Authority: 5 U.S.C. 301, 303; 5 U.S.C. App. (Inspector General Act of 1978); 18 U.S.C. 208; and E.O. 12674, 54 FR 15159, 3 CFR, 1989 Comp., p. 215, as modified by E.O. 12731, 55 FR 42547, 3 CFR, 1990 Comp., p. 306.

§ 1010.101 General.

This part applies to employees of the Department of Energy (DOE), excluding employees of the Federal Energy Regulatory Commission.

§ 1010.102 Cross-reference to employee ethical conduct standards and financial disclosure regulations.

Employees of DOE are subject to the Standards of Ethical Conduct for Employees of the Executive Branch at 5 CFR part 2635, the DOE regulation at 5 CFR part 3301 which supplements the executive branch-wide standards, the executive branch-wide financial disclosure regulations at 5 CFR part 2634, and the executive branch-wide employee responsibilities and conduct regulation at 5 CFR part 735.

§ 1010.103 Reporting wrongdoing.

(a) Employees shall, in fulfilling the obligation of 5 CFR 2635.101(b)(11), report fraud, waste, abuse, and corruption in DOE programs, including on the part of DOE employees, contractors, subcontractors, grantees, or other recipients of DOE financial assistance, to the Office of Inspector General or other appropriate Federal authority.

(b) All alleged violations of the ethical restrictions described in section 1010.102 that are reported in accordance with (a) of this section to an appropriate authority within the Department shall in turn be referred by that authority to the designated agency ethics official or his delegatee, or the Inspector General.

§ 1010.104 Cooperation with the Inspector General.

Employees shall respond to questions truthfully under oath when required, whether orally or in writing, and must provide documents and other materials concerning matters of official interest. An employee is not required to respond to such official inquiries if answers or testimony may subject the employee to criminal prosecution.

§ 1010.105 Conflict of interest waiver.

If a financial interest arises from ownership by an employee, or other person or enterprise referred to in 5 CFR 2635.402(b)(2), of stock in a widely diversified mutual fund or other regulated investment company that in turn owns stock in, or bonds of, another enterprise, that financial interest is exempt from the prohibition of 5 CFR 2635.402(a).

[FR Doc. 96–17115 Filed 7–3–96; 8:45 am]

BILLING CODE 6450–01–P

OFFICE OF PERSONNEL MANAGEMENT

5 CFR Part 734

RIN 3206–AH33

Political Activities of Federal Employees

AGENCY: Office of Personnel Management.

ACTION: Final rule.

SUMMARY: The Office of Personnel Management (OPM) is issuing final regulations regarding the political activity of Federal employees. These regulations will inform Federal employees of the political activities which are permitted and prohibited under the Hatch Act Reform Amendments of 1993. Covered employees also should refer to OPM's interim regulations as part 733, published in the Federal Register in the February 4, 1994 edition, which specifically address political activities connected with local elections in designated communities.

EFFECTIVE DATE: August 5, 1996.

FOR FURTHER INFORMATION CONTACT: Jo-Ann Chabot at (202) 606–1700.

SUPPLEMENTARY INFORMATION: On October 6, 1993, the President signed the Hatch Act Reform Amendments of 1993. The Reform Amendments became

effective on February 3, 1994 and OPM has the authority to issue regulations under the Reform Amendments. On September 23, 1994, OPM issued interim regulations with a request for comments at part 734 concerning the political activities that generally are permitted and prohibited to Federal employees. OPM received comments from nine Federal agencies, two Federal employee labor organizations, and an individual before the comment period closed on November 22, 1994. OPM's observations about the comments follow the numerical order of the regulations starting at subpart A and ending with subpart G.

Comment on Supplementary Information Preceding the OPM Interim Regulations

One Federal agency commented that the supplementary information preceding OPM's interim regulations requires clarification of the language which makes it appear that § 734.208 applies exclusively to Federal employees who belong to a Federal employee labor organization. The agency noted that the language of § 734.208 clearly shows that the requirement of belonging to a Federal employee labor organization, or other Federal employee organization, applies only to the fundraising activities described in § 734.208(b)(4). OPM agrees. Every employee who is covered under subparts B and C of part 734 may participate in the activities described in § 734.208 (a) and (b) (1) through (3). The activities described in § 734.208(b)(4) are limited to members of the Federal employee labor organizations and Federal employee organizations that meet the requirements of 5 U.S.C. 7323(a)(2) and 5 CFR 734.103. Sections 734.404(c)–(d) and 734.410 describe permitted and prohibited fundraising activities for employees covered under subpart D.

Subpart A—General Provisions

Section 734.101 of the interim regulations provides definitions for certain terms used throughout the regulations. The regulations define "accept" and "receive" as the acts of accepting or receiving something from a person officially on behalf of a candidate, a campaign, a political party, or a partisan political group. One Federal agency and one Federal employee labor organization commented that the language from the supplementary material preceding the interim regulations which noted that "ministerial activities preceding or following the official acceptance and receipt are not covered under the definitions" should be added to the definitions. OPM agrees that adding such language to the definitions of "accept" and "received" clarifies the definitions and has made the suggested changes.

OPM also received two comments on the definition of "on duty" in § 734.101. A Federal agency commented that the definition should contain language from the supplementary material preceding the interim regulations noting that it is not appropriate to grant excused absence (administrative leave) to participate in political activities. This agency also noted that the definition should note that it is not appropriate to request sick leave in order to participate in political activity. While OPM has the authority to regulate a covered employee's partisan political activity, the granting of excused absence is a matter of agency discretion. However, an agency's decision to grant excused absences for the purposes of engaging in partisan political activities or partisan political management would not be appropriate. Indeed, granting excused absences solely for the purposes of participation in partisan political activities might be a violation of the prohibitions against use of official authority or influence to interfere with or affect the results of an election. In addition, 5 U.S.C. 6307 and OPM's regulations at 5 CFR 630.401 prescribe the conditions under which an employee may use sick leave. It is not appropriate to permit the use of sick leave to participate in partisan political activities. Sick leave should be granted only under the conditions prescribed by 5 U.S.C. 6307 and 5 CFR 630.401.

Citing *Bureau of Alcohol, Tobacco and Firearms* v. *Federal Labor Relations Authority*, 464 U.S. 89, 105 (1983), a Federal employee labor organization commented that the definition of "on duty" should exclude "official time" given to employees who are labor organizations officials because employees on "official time" are not considered to be in duty status, except for purposes of being paid. Thus, the labor organization noted that, as a matter of statutory construction, official time is simply not time "on duty." The Supreme Court concluded in this decision that Federal employees who negotiate on behalf of a labor organization are not conducting official business on behalf of the Government. However, the Supreme Court reached this conclusion for the limited purpose of determining whether Federal employees who represent their labor unions in collective bargaining with agencies are entitled to reimbursement from the Government for travel and per diem expenses.

Citing *National Federation of Federal Employees and U.S. Department of Veterans Affairs*, 47 FLRA 1118, 1124, (1993) (*NFFE*) and *American Federation of Government Employees and U.S. Department of Labor*, 39 FLRA 546, 553 (1991), (*AFGE*), the labor organization also noted that the Federal Labor Relations Authority (FLRA) has sanctioned the use of official time for union representatives to lobby Congress concerning working conditions. *NFFE* concerned a collective bargaining proposal to authorize the use of a reasonable amount of time as official time under 5 U.S.C. 7131(d) to lobby members of Congress in support of or opposition to pending or desired legislation which would affect the working conditions of employees represented by the union. The FLRA found that 5 U.S.C. 7102 contemplates that employees will express their views to Congress through their exclusive representative, and specifically grants employees functioning as labor representatives the right to present the views of the labor organization to Congress. It also found that the proposal concerned labor-management relations activities for which official time is authorized under section 7131(d). Although the FLRA concluded that the proposal was negotiable under section 7131(d), the FLRA reached its decision within the context of petitioning Congress regarding nonpartisan issues that generally affect employees' working conditions. It did not determine whether these statutory provisions also provide for official time to participate in partisan political activities on behalf of individuals who are candidates for partisan political office.

AFGE concerns an agency denial of an employee's request to use an agency automobile and to use official time for travel to and from a hearing regarding his claim for workers' compensation. The FLRA held that 5 U.S.C. 7131(d) did not preclude the parties in the case from agreeing to provide for official time in circumstances unrelated to labor-management relations activities, provided that granting such official time was consistent with the statute and other applicable laws and regulations. The FLRA cited attendance at hearings before the Equal Employment Opportunity Commission and responding to discovery requests in cases before the Merit Systems Protection Board as examples of circumstances unrelated to labor-management relations activities where use of official time might be authorized. Thus, this decision clearly was made

definition. OPM has incorporated into part 734 the definition of "PAC" that OLC used in its opinion. OPM notes that the definition does not make a distinction between partisan and nonpartisan PACs because, according to the OLC opinion, donating to a PAC that meets this definition would be considered political activity within the meaning of the Reform Amendments.

OLC noted in this regard that political activity includes actions sufficient to effect the making of a political contribution, such as taking steps to ensure that part of one's salary is contributed to a political campaign or a PAC. OLC noted that the OPM interim regulations on political activity confirmed its view that contributing to political candidates constitutes political activity within the meaning of the OPM interim regulations because it is directed toward the success or failure of a political party, candidate for partisan political office, or partisan political group. OPM has not revised this definition of political activity.

Moreover, OLC noted that Congress intended that making contributions to PACs would be considered political activity under the terms of the Reform Amendments. It noted that Senator Glenn, the leading Senate sponsor of the Reform Amendments, referred specifically to PAC contributions in describing examples of the political activities that the Reform Amendments would prohibit on duty. *See* 139 Cong. Rec. S8929 (daily ed. July 20, 1993). In view of this, OMP believes that it is not necessary to further refine the OLC definition of PAC. OPM has added to § 734.101, a definition of the term "political action committee" which tracks the definition of "political committee" in 26 U.S.C. 9002(9).

OLC opined that most Federal employees are not barred from using the salary allotment system to make contributions to PACs. Thus, Federal employees who are subject to subparts B through D of part 734 are not prohibited from making a voluntary allotment to a PAC.

OLC opined in addition that 5 U.S.C. 7324(a)(1)(4) prohibits Federal employees from taking steps sufficient to effect the making of a PAC contribution while they are on duty or in a Federal building. Thus, employees who are subject to subparts B through D of part 734 are prohibited from filling out direct-deposit forms for salary allotments to PACs while they are on duty or in a Federal building, and from personally delivering such forms to payroll employees who would process or administer these allotments. OPM has amended §§ 734.208, 734.306, 734.404, and 734.406 of its regulations to reflect the conclusions stated on the OLC opinion. OPM also has added to § 734.101, a definition of the term "political action committee" which tracks the definition of "political committee" in 26 U.S.C. 9002(9).

OLC also opined that Federal employees who are identified in 5 U.S.C. 7324(b)(2) may not use the salary allotment system to contribute money to PACs. Section 7324(b)(2) applies to employees whose duties and responsibilities "continue outside normal duty hours and while away from the normal duty post" and who are either employees (1) "paid from an appropriation for the Executive Office of the President" or (2) "appointed by the President, by and with the advice and consent of the Senate, whose position(s are) located within the United States in relations with foreign powers or in the nationwide administration of Federal laws." Such employees are covered under subpart E of OPM's regulations. OLC opined that in the use of the salary allotment system, the costs associated with the transfer of contributions to PACs would be borne by the Federal Government, and 5 U.S.C. 7324(b)(1) of the Reform Amendments prohibits these employees form engaging in political activity using "money derived from the Treasury of the United States." OPM has added to subpart E a new provision that reflects this prohibition.

Finally, the OLC opinion stressed that 5 U.S.C. 5525, the statutory provision governing allotment and assignment of pay, as well as the OPM allotment regulations at 5 CFR 550.311(b), provide that individual agency heads have the discretion to determine whether eligible employees of the agency may use the allotment system for particular purposes, such as making contributions to PACs.

E.O. 12866, Regulatory Review

This rule has been reviewed by the Office of Management and Budget in accordance with E.O. 12866.

Regulatory Flexibility Act

I certify that these regulations would not have a significant economic impact on a substantial number of small entities because they would apply only to Federal agencies and employees.

List of Subjects in 5 CFR Part 734

Political activities (Government employees)

U.S. Office of Personnel Management.
James B. King,
Director.

Accordingly, the Office of Personnel Management interim rule adding 5 CFR part 734, published at 59 FR 48765 on September 23, 1994, is adopted as a final rule with the following changes:

PART 734—POLITICAL ACTIVITIES OF FEDERAL EMPLOYEES

1. The authority citation for part 734 continues to read as follows:

Authority: 5 U.S.C. 1103, 1104, 7325; Reorganization Plan No. 2 of 1978, 92 Stat. 3783, 3 CFR 1978 Comp. p. 323; and E.O. 12107, 3 CFR 1978 Comp. p. 264.

2. In § 734.101 the definitions of *accept*, and *receive*, are revised, and the definitions of *occasional, political action committee, recurrent*, and *room or building occupied in the discharge of official duties by an individual employed or holding office in the Government of the United States or any agency thereof* are added in alphabetical order, to read as follows:

§ 734.101 Definitions.

* * * * *

Accept means to come into possession of something from a person officially on behalf of a candidate, a campaign, a political party, or a partisan political group, but does not include ministerial activities which precede or follow this official act.

* * * * *

Occasional means occurring infrequently, at irregular intervals, and according to no fixed or certain scheme; acting or serving for the occasion or only on particular occasions.

* * * * *

Political Action Committee means any committee, association, or organization (whether or not incorporated) which accepts contributions or makes expenditures for the purpose of influencing, or attempting to influence, the nomination or election of one or more individuals to Federal, State, or local elective public office.

* * * * *

Receive means to come into possession of something from a person officially on behalf of a candidate, a campaign, a political party, or a partisan political group, but does not include ministerial activities which precede or follow this official act.

Recurrent means occurring frequently, or periodically on a regular basis.

Room or building occupied in the discharge of official duties by an individual employed or holding office in the Government of the United States or

Rules and Regulations

Federal Register
Vol. 59, No. 184
Friday, September 23, 1994

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OFFICE OF PERSONNEL MANAGEMENT

RIN 3206–AG07

5 CFR Part 734

Political Activities of Federal Employees

AGENCY: Office of Personnel Management.

ACTION: Interim regulations with request for comments.

SUMMARY: The Office of Personnel Management (OPM) is issuing interim regulations regarding the political activities of Federal employees. On October 6, 1993, the President signed the Hatch Act Reform Amendments of 1993. The Amendments became effective on February 3, 1994, and OPM has the authority to issue regulations under the Amendments. The interim regulations will inform Federal employees of the political activities which generally are permitted and prohibited under the Amendments. Federal employees also should refer to OPM's interim regulations at part 733, published in the Federal Register in the February 22, 1994 edition, regarding permitted and prohibited political activities connected with local elections in the designated communities.

DATES: Effective Date: September 23, 1994.

Comments must be received on or before November 22, 1994.

ADDRESSES: Comments may be sent or delivered to Lorraine Lewis, General Counsel, Room 7355, United States Office of Personnel Management, 1900 E Street NW., Washington, DC 20415.

FOR FURTHER INFORMATION CONTACT: Jo-Ann Chabot or Karen D. Kline at (202) 606–1700.

SUPPLEMENTARY INFORMATION: Pursuant to section 553(b)(3) of title 5, United States Code, the Director finds that good cause exits for waiving the general notice of proposed rulemaking. The notice is being waived because, in view of the statutory penalties which result from violations of the Amendments' prohibitions, it is crucial for employees who are covered under the Amendments to know about the political activities which the Amendments permit and prohibit.

While these regulations were being written, OPM received several suggestions from individuals, several Federal labor organizations, and many Federal agencies on issues that might be addressed through the regulations. Many of the comments and suggestions concerned similar or identical issues, and these issues have been addressed in the regulations. Issues which could not be addressed in the regulations are discussed in this summary.

Part 734 is divided into several subparts for purposes of clarity. Subpart A—General Provisions includes definitions as well as jurisdictional and reporting provisions.

Section 734.101 in subpart A defines the terms which are most frequently used in OPM's political activity regulations. The definitions of employee and partisan political office in § 734.101 track the statutory definitions of these terms.

The Amendments indirectly define the terms "Federal labor organization" and "multicandidate political committee" by referring to other statutory provisions which provide a detailed definiton of these terms. Section 734.101 similarly defines these terms by incorporating the statutory references cited in the Amendments. Because of the complex structural organizations of the various agencies and instrumentalities of the United States and District of Columbia Government it would be difficult to adopt a comprehensive definition of "employing office." Therefore, § 734.101 specifies that the head of each agency or instrumentality shall determine the appropriate employing offices within it and provide notice to employees through internal agency notice procedures. Identification of such employing offices is distinct from, and need not coincide with, those established for any other purpose.

The definition of "Federal employee organization" is in conformance with the definition of "Federal employee organization" in Executive Order 10988, January 17, 1962 which was revoked by Executive Order 11491 and reflects that this term refers to nonprofit associations or organizations which are composed of Federal employees. The Amendments specifically tie the concept of Federal labor organization to the definition of labor organization in 5 U.S.C. 7103(a)(4). Because employees of the District of Columbia are not Federal employees, and their labor organizations are not covered under 5 U.S.C. Chapter 71, the definitions of the terms "Federal labor organizations" and "Federal employee organization" do not include such organizations comprised of employees of the District of Columbia.

Several Federal labor organizations and one agency raised the issue of what constitutes a "political contribution" commenting that the Amendments not only allow Federal employees to volunteer their services to campaigns, but also allow Federal employees to direct and solicit other volunteers. In their view, this comports with the fundamental purpose of the Amendments. These commentators felt that volunteer services under the Amendments should be treated the same as under Federal election law—i.e., they are not considered "political contributions." In a letter dated September 7, 1994, Senator John Glenn and Representative William L. Clay, the Chairmen of the respective committees of jurisdiction, opined that "as the sponsors and managers of this legislation in the House and Senate, [we] never intended that routine campaign volunteer activities should be treated as political contributions."

Clearly this is an issue that goes to the heart of the Amendments. The explicit purpose of the Amendments is to "provide for Federal civilian employees to participate voluntarily, as private citizens, in the political processes of the Nation and to protect such employees and the General citizenry from improper political solicitations." S. Rep. No. 57, 103 Cong., 1st Sess., at 1 (1993). In particular, the Amendments allow a Federal employee to manage a campaign. The issue raised by these commentators is whether the allowable political activities encompass Federal employees directing and soliciting volunteer services. The commentators argue that to conclude in the negative would be contrary to the purpose of the

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Amendments. One commentator noted, "[I]nterpreting the term 'personal services' to include the activities of these sorts of campaign volunteers would seriously undermine Congressional intent to allow Federal employees greater freedom to participate in the political process. In fact, that interpretation could entirely negate certain rights the Act explicitly grants. Thus, for example, the Act generally authorized Federal employees to 'take an active part in political management or in political campaigns.' An individual could not, as a practical matter, manage a campaign if he or she were precluded from soliciting, accepting, or even receiving, the help of volunteers." Another commentator stated that prohibiting solicitation of volunteer services "not only thwarts the intent of Hatch Act Reform, it would clearly render (the Act) internally inconsistent." Finally, Chairmen Glenn and Clay provided, "It was, and remains, our intention that the term 'political contribution' be defined in a manner that does not render meaningless the language of the Act* intended to protect the ability of Federal employees to take an active part in political management or in political campaigns."

In light of the absence of a conference report, the interpretation espoused by Chairmen Glenn and Clay is logical and deserving of deference. In order to implement the intent of the Amendments to allow Federal employees to participate actively in political management and campaigns, the definition of "political contribution" in § 734.101 tracks the statutory definition of this term, with one significant addition. The regulations specify that individualized uncompensated volunteer services are not a "thing of value" and are excluded from the definition of "political contribution." This exclusion of individualized uncompensated volunteer services from the definition of "political contribution" directly parallels the definition of "contribution" found in the Federal Election Campaign Act, 2 U.S.C. 431.

Under this definition, the "personal services" which are included in the definition of "political contribution" are those paid or unpaid services of a business or corporation. The Amendments' distinction of individualized uncompensated volunteer services from services provided by a business or corporation, thus, mirrors the distinction contained in the Federal Election Campaign law.

By excluding individualized volunteer services from the definition of "political contribution," the regulations allow Federal employees to solicit, accept, and receive individualized volunteer services as well as direct or supervise those volunteers. This definition allows the Amendments' inclusion of personal services, paid or unpaid, to be read in the context of the explicitly permissible activities.

Although Federal employees are allowed to solicit, accept, and receive individualized uncompensated volunteer services, the regulations prohibit Federal employees from soliciting, accepting, or receiving such services from subordinates. Further solicitation, acceptance, or receipt of such services must comply with the Standards of Ethical Conduct for Employees of the Executive Branch in 5 CFR part 2635, as well as any other directives that may apply, *e.g.*, the Federal Property Management Regulations in 41 CFR chapter 101.

In connection with political contributions, section 734.101 also defines the terms "accept" and "receive." These definitions cover only the acts of accepting or receiving something from a person officially on behalf of a candidate, campaign, a political party, or a partisan political group. Ministerial activities which precede or follow the official acceptance and receipt, such as handling, disbursing, or accounting for contributions are not covered under the definitions of "accept" and "receive."

The Amendments specifically prohibit covered employees from "knowingly" soliciting political contributions. Thus, § 734.101 of the interim regulations also defines "solicit" as expressly requesting of another person that he or she contribute something to a candidate, a campaign, a political party, or partisan political group.

Section 734.101 defines the term "on duty" because the concept is central to the political activity prohibition for most employees. The definition provides that an employee is on duty when in a pay status (i.e., when receiving pay for hours of duty) or when representing the United States Government or District of Columbia Government in an official capacity. The definition provides that for the purposes of this part, an employee is not considered to be in a pay status when in a paid leave status, using compensatory time off, using credit hours earned in an alternative work schedule, using time off granted as an incentive award, or excused absence because the employee is free to spend the time off as he or she chooses. Similarly, an employee receiving premium pay for standby duty is considered to be in a pay status for those hours, while an employee in an unpaid, on-call status is not in a pay status. Further, when an employee performs work that is recognized as overtime work under title 5 of the United States Code, the Fair Labor Standards Act, or similar statute, the employee is considered to be in a pay status, even if under some circumstances the employee is prevented from receiving pay or compensatory time off for that work (e.g., due to the biweekly pay limitation under 5 U.S.C. 5547).

The definition provides a second criterion in order to accommodate those employees who are not in a leave system. For purposes of this part, employees who are not covered by a leave system are considered to be on duty when they are representing the United States Government or District of Columbia Government in an official capacity.

Several parties have inquired as to whether an employee is on duty when in a leave without pay status. Since an employee is not in a pay status on leave without pay, he or she is not on duty. Other parties have asked about retention of life, health, and retirement benefits on leave without pay. OPM regulations concerning leave, pay, and retirement govern these issues.

One agency asked about the possibility of granting excused absence (currently described in subchapter 11 of Federal Personnel Manual Chapter 630 and colloquially referred to as "administrative leave") for purposes of engaging in political activities or political management. OPM believes that an agency's granting such excused absence for the purposes of engaging in political activities or political management is not appropriate.

Section 734.102(a) reflects that the United States Office of Special Counsel is authorized to investigate and prosecute alleged violations of the Amendments, and issue advisory opinions regarding permitted and prohibited political activities. It also provides the address and telephone numbers of that Federal agency for employees who seek advisory opinions. Section 734.102(b) reflects that the United States Merit Systems Protection Board determines when a violation of the Amendments has occurred, and describes the penalties for a violation. Section 734.102(c) reflects that the Office of Personnel Management is authorized to issue regulations concerning the political activities which the Amendments permit and prohibit. The authority of OPM to issue such regulations was affirmed by the Office

Mr. COX. Would the gentleman yield, because the statute is different as well as the advice memorandum.

Mr. WAXMAN. I do not yield. I'm submitting for the record the statement of the Office of Personnel Management dealing with interim regulations that is pertaining to the White House itself.

It seems to me that what we have repeatedly is a statement we're going to go into foreign contributions. And yet, 2 weeks ago, the subpoenas went out from this committee to the Teamsters. That has nothing to do with foreign contributions.

What we're trying on this committee on behalf of the Republicans is to try to see if they can stir up some kind of claim of illegality out of thin air. And to me, I think that is the wrong thing for us to be doing. It's a waste of taxpayers' money. It is partisan. It is just not credible as a serious investigation. And we've already spent $3 million on this committee, just to fund this investigation for which we have nothing new, nothing new. Even your testimony is not fresh for this committee because you've already given depositions in the Senate, given depositions here. All of this has been reviewed over and over again. Nothing new has come out of this hearing.

And I think this whole investigation is a very sad chapter in the House of Representatives, in the history of what ought to be our clear responsibility for oversight. This is a ridiculous process.

And by the way, OPM and the Ethics Committee on this issue agree on the interpretation of the law. Only Mr. Cox and Mr. Barr disagree. And I would be pleased to yield to the gentleman from California if he wants to make any further comments. But he might want to wait to see what the document that I have and am putting into the record says so he'll know for sure what the rules are that pertain to the White House. I ask unanimous consent it be made part of the record.

Mr. COX. I would be happy to accept the gentleman's invitation of time.

Mr. BURTON. The time has expired, but if——

Mr. WAXMAN. Well, then, I don't have time to yield, and therefore I don't yield.

Mr. BURTON. OK. Mr. Mica, you're recognized.

Mr. MICA. I thank you, Mr. Chairman. I might just comment on a couple of things. First of all, the pictures that we have over here with the Republican Governors, I heard one of my colleagues say that they made it into the Statehouse and the White House. Well, that's not a matter of fact, because these pictures were all taken on the same day at the Republican Governors Association. In fact, just look, he's wearing the same tie in all the photos.

These meetings did not involve arranging 55 visits to the White House. These photos did not involve $50,000 checks being passed to a Government employee in any instance that I know of. These photos did not involve the records of money coming from foreign sources to make those contributions. These instances did not, in fact, bring foreign nationals to arrange meetings while the President of the United States made a national radio address. And these photos didn't offer the access that we've seen demonstrated here today by this hearing.

These photos did not arrange for giving of $40,000, December 14, 1994 to the DNC again through questionable sources; $50,000, March 9, 1995 to the DNC again from questionable foreign sources; $125,000, April 8, 1995 again to the DNC, and a grand total of $366,000, a few more dollars than he could have covered in his account as alleged by the other side.

Ms. Williams, do you know Ms. Cara—I think it's Ceandra Scott at the DNC?

Ms. WILLIAMS. Yes, I do.

Mr. MICA. Now you testified a few minutes ago that you had nothing to do with getting Mr. Chung and his Chinese delegation into the Presidential radio address on March 11, 1995; is that correct?

Ms. WILLIAMS. That's correct.

Mr. MICA. Ms. Scott in fact has told the committee that she may have spoken to you specifically and made that request of you. Do you think she's wrong?

Ms. WILLIAMS. I can only recall one time when I spoke with Ms. Scott regarding a radio address, and that was a radio address for either her parents or her grandparents.

Mr. MICA. But you did not arrange or make any arrangements personally? And have you knowledge of your staff making arrangements to get Mr. Chung and these guests into this event?

Ms. WILLIAMS. No, not to my knowledge.

Mr. MICA. You said in your testimony, that Mr. Chung had asked you about giving money to the President or the First Lady. Was that from the very beginning of your meetings with him?

Ms. WILLIAMS. Well, as I said before, I never had any real meetings with him.

Mr. MICA. Well, your conversations with him. You have in your testimony that Mr.—he said, so when he asked how he could give and show his support, I told him he could.

Ms. WILLIAMS. Yeah. He constantly asked me.

Mr. MICA. He asked you. You didn't say, would you like to give?

Ms. WILLIAMS. No.

Mr. MICA. OK. And then you said you could support, in your quote, the DNC; give to Clinton/Gore campaign. And you've also said you were somewhat aware of the law, that you said you couldn't take that money. That was sometime earlier before you took the $50,000 on, when was it, March—when did you take the $50,000 check? March 9?

Ms. WILLIAMS. That's the date people tell me. I'm not aware of the date.

Mr. MICA. But he remembers giving a check.

Ms. WILLIAMS. I remember getting a check.

Mr. MICA. And you had suggested to him—these are your words and your testimony to this committee—support the DNC. And he brings you a check for $50,000. It doesn't raise a question, or him giving you a check?

Ms. WILLIAMS. I'm sorry. It doesn't raise a question? I'm sorry. I don't understand the question.

Mr. MICA. Well, you gave him an array of contribution possibilities, "Give to the Clinton/Gore campaign." This is from your testimony in your quotes. "Support the DNC" in quotes; "Give to Clin-

ton/Gore campaign," in quotes. "Help the President and Mrs. Clinton's legal defense fund," in quotes. You said those were your standard responses to people who were offering to help; is that correct?

Ms. WILLIAMS. That's correct.

Mr. MICA. And that's what you told him.

Ms. WILLIAMS. When he asked me, yes.

Mr. MICA. Did you ever receive any other checks or contributions? Were there any personally handed to you——

Ms. WILLIAMS. No.

Mr. MICA [continuing]. For any of these organizations I've cited or groups?

Ms. WILLIAMS. No.

Mr. MICA. This is the only one?

Ms. WILLIAMS. This is the only one.

Mr. MICA. And the same day that you received this, Mr. Chung was also invited to the White House Mess or allowed—it's not easy to get in the White House Mess.

Ms. WILLIAMS. No, it's——

Mr. MICA. Who made the arrangements to get him into the White House Mess?

Ms. WILLIAMS. Well, first of all, it really isn't so difficult to get into the White House Mess.

Mr. MICA. If the First Lady's chief assistant gets you in.

Ms. WILLIAMS. No, because the White House Mess is essentially personal accounts, which is to say, if I get an apple from the White House Mess, it's charged to me.

Mr. MICA. Did you get Johnny Chung in before he gave you the check or after he gave you the check?

Ms. WILLIAMS. I believe that I had gotten him in one—Johnny Chung?

Mr. MICA. Well, the group that went to the White House Mess; was it the officials, the Chinese officials, the delegation?

Ms. WILLIAMS. Well——

Mr. MICA. And Mr. Chung, and all of the above.

Ms. WILLIAMS. First of all, I don't actually know who went to the Mess with Mr. Chung that day. But I certainly did ask Ms. Ryan or someone in my office to make a reservation under my name for Mr. Chung.

Mr. MICA. After he gave you the check or before?

You don't recall?

Ms. WILLIAMS. I don't recall. But I do recall him having used my Mess account before on another occasion before the check, I believe.

Mr. BURTON. The gentleman's time has expired.

Mr. MICA. Thank you, Mr. Chairman.

Mr. BURTON. Mr. Davis.

Mr. DAVIS OF VIRGINIA. Ms. Williams, thank you for coming. I don't have any questions, but I'm going to yield time to my friend from California, Mr. Horn.

Mr. HORN. I thank the gentleman. Mr. Waxman had some comments to make, and I want to ask this question while you're here, because one of the witnesses will come after you're finished.

Mrs. Hernreich, as I recall from her deposition, said—was told by President Clinton after the Chinese delegation visited him in the

Oval Office, "You shouldn't have done that," unquote. Or also, "We shouldn't have done that," unquote, referring to those pictures that were taken of the President and the members of the Chinese delegation.

Did Mrs. Hernreich talk to you after that picture was taken and the President was slightly upset about it all as a national security matter? Did she ever call you and say who brought them through here?

Ms. WILLIAMS. No. I don't recall a conversation with Nancy Hernreich about that.

Mr. HORN. Let me move to another situation, the Back to Business situation. What was the basic purpose of that Back to Business Committee?

Ms. WILLIAMS. As I understood, the Back to Business Committee were a group of people who were primarily spokespersons who operated outside of the White House to answer the charges made about the President and the First Lady.

Mr. HORN. What sort of charges are we talking about?

Ms. WILLIAMS. Oh, too numerous to—I mean, there are all kinds of things that were being said about them.

Mr. HORN. Well, did it have to do with things when he was Governor or when he was President?

Ms. WILLIAMS. Oh, I can't remember. Just generally any bad thing that could be said.

Mr. HORN. This was an all-purpose committee, in other words?

Ms. WILLIAMS. As I understood it.

Mr. HORN. Handling anything that was going to the outfield.

Ms. WILLIAMS. As I understood it, yes, sir.

Mr. HORN. Did it concern charges arising from Whitewater?

Ms. WILLIAMS. Yes.

Mr. HORN. Was that the primary thrust of the committee?

Ms. WILLIAMS. I don't believe so.

Mr. HORN. What was its primary thrust?

Ms. WILLIAMS. Like I said, I thought the main thing was to have other spokespeople to respond. The primary was to have spokespeople.

Mr. HORN. Who founded that committee?

Ms. WILLIAMS. Lynn Cutler was one of the cofounders.

Mr. HORN. Was the other cofounder Anne Lewis?

Ms. WILLIAMS. Anne Lewis could have been a cofounder. I don't know if she was brought in later or she was a cofounder.

Mr. HORN. And what is Mrs. Lewis's position in the White House now?

Ms. WILLIAMS. She is Director of Communications.

Mr. HORN. What is Mrs. Cutler's position in the White House?

Ms. WILLIAMS. I'm really not sure. OK, I'm sorry. She's in Intergovernmental Affairs.

Mr. HORN. Is she Deputy White House Director of Intergovernmental Affairs? Does that ring a bell?

Ms. WILLIAMS. That could be so. I don't know if that happened after I left or—but she works at the White House, yes.

Mr. HORN. Were discussions ever held with the First Lady about the information or advertisements that the Back to the Business Committee was promulgating?

Ms. WILLIAMS. I'm certain that there was a point that I told Mrs. Clinton that there were people who were speaking out on her behalf.

Mr. HORN. Well, did you get some of these advertisements or leaflets or brochures or different forms of communication and ever take them in to the First Lady?

Ms. WILLIAMS. No.

Mr. HORN. So you weren't involved in approval or disapproval?

Ms. WILLIAMS. Oh, of their materials?

Mr. HORN. Yes.

Ms. WILLIAMS. No, not at all.

Mr. HORN. Did the White House or the First Lady's office or you or anyone else you know in the White House ever provide the committee with a list of potential donors?

Ms. WILLIAMS. With a list of potential donors?

Mr. HORN. Potential donors. Even one donor. One and up.

Ms. WILLIAMS. I don't know about anyone else at the White House or if there was any specific list. But as I said in my statement today, I was asked by Lynn Cutler for people to go on the television and people who might contribute to the group. And I gave her some names, three or four names.

Mr. HORN. At your suggestion, Ms. Cutler contacted Chung for a contribution the day after the December 8, 1995 White House Christmas party, and Ms. Cutler introduced herself as a friend of the First Lady who was referred to him by you, according to an August 9, 1997 Los Angeles Times article; is that correct?

Ms. WILLIAMS. Well, I did give her his name. I wasn't there at the Christmas party when she talked to him, but I did give him her name.

Mr. HORN. Did Mrs. Cutler know Chung at that point when you gave the name? Had she met him during some of the tours?

Ms. WILLIAMS. I don't know. I don't know.

Mr. HORN. Did you suggest that Mrs. Cutler contact other potential contributors? And how many were they?

Ms. WILLIAMS. As I said before, I gave her three or four or five or six names. I remember a Mr. Chung as a contributor, but I primarily gave her names of people I thought could go on television. And given my communications background, I thought that's what she thought I would be able to give her. In addition, I gave her Mr. Chung and I don't know who else.

Mr. HORN. Well, Mr. Chung let's say is one of the four. Who were the other three?

Ms. WILLIAMS. I do remember that I gave her the name of Kiki Moore as someone who could go on television. I don't remember the other three, but those two names I should remember.

Mr. HORN. Is that a celebrity that I ought to know and don't know?

Ms. WILLIAMS. No, no, not a celebrity at all. Just a young woman who is very good at speaking on television.

Mr. HORN. And did she do that?

Ms. WILLIAMS. Speak on television?

Mr. HORN. Yes.

Ms. WILLIAMS. Yes, I believe she did once or twice, yeah.

Mr. HORN. So we assume Mrs. Cutler contacted her and got her involved.

Ms. WILLIAMS. I don't know who contacted her, but that was the name I did give to her.

Mr. HORN. Why did you suggest Mr. Chung and these other individuals to Mrs. Cutler to contribute to Back to Business? Was there any particular reason?

Ms. WILLIAMS. Only that I was trying to think of people who had asked to be helpful to Mrs. Clinton. And he had on numerous occasions. And so his name was a name that I gave to her.

Mr. HORN. Did Johnny Chung ever contact you inquiring about Lynn Cutler?

Mr. WAXMAN. Point of order, Mr. Chairman.

Ms. WILLIAMS. I'm sorry. Can you repeat the question?

Mr. HORN. Did Johnny Chung ever contact you inquiring about Lynn Cutler?

Mr. BURTON. The gentleman's time has expired.

Ms. WILLIAMS. No, I don't recall that he did.

Mr. BURTON. The gentleman's time has expired.

Mr. Portman.

Mr. PORTMAN. Mr. Chairman, I'm happy to yield some time to you or, in your discretion, to Mr. Horn.

Mr. BURTON. If the gentleman will yield to me, I'll take a minute or so.

Mr. PORTMAN. Can I make a brief statement first and then I'll be happy to yield? I don't have any questions.

Mr. BURTON. Fine.

Mr. PORTMAN. I would like to make a quick statement. I've listened carefully today. We started off with my friend from California, Mr. Waxman, saying the only useful purpose here is to develop new campaign finance laws. I think that's inaccurate. I think the oversight is very important. I think that's what the committee is supposed to do. I think it's a useful public hearing of specific ethical issues, in this case surrounding Johnny Chung. And among the concerns I've heard today are inappropriate White House access, improper use of that access, potential use as a conduit for foreign money, even potential and national security issues related to the People's Republic of China.

And I think, at the very least, this has been a very useful public hearing, because it helps to establish what the ethics rule should be and puts this administration and future administrations on notice; and that is, that the ethics rules need to be followed, that they do exist, the current rules in those gray areas, and they always exist to seek to adhere to higher ethical standards particularly in the Nation's White House.

Mr. WAXMAN. Will the gentleman yield to me?

Mr. PORTMAN. I think this is an important service to the country and I commend the chairman and I will not yield time.

Mr. WAXMAN. If the gentleman would yield to me for one comment, I don't disagree with what you are saying but I hope we will learn also to change the campaign finance rules that encourage this payment of money for access, which we see permeating throughout both the White House and Federal campaigns, but Congress as well.

Mr. PORTMAN. Reclaiming my time, that is an issue that there is not a consensus on in this committee, much less this Congress and this country, and I think in the meantime this is a very important exercise, and I will now yield my time to the chairman.

Mr. BURTON. Thank you, Mr. Portman.

First of all, Ms. Williams, to clear up one thing, you were here, I guess, of your own volition to be at the First Lady's 50th birthday party; is that correct?

Ms. WILLIAMS. No.

Mr. BURTON. Oh, you were not?

Ms. WILLIAMS. I did go to it, but that was not the reason I came.

Mr. BURTON. Did you go back to Paris after that?

Ms. WILLIAMS. I was on my way to Paris—back to Paris when my lawyer called me and told me that——

Mr. BURTON. You didn't leave the country? You stayed.

Ms. WILLIAMS. I stayed because it was a week from——

Mr. BURTON. I appreciate that.

According to the information we have, you said you did not solicit money from Johnny Chung, and you did not discuss with him the money to the DNC owed the White House, and you do not know how he was aware of that.

Now, on page 110 of Evan Ryan's deposition, which was released today, here is what she said, talking about Ms. Williams' response:

"Her response was we would see, you know, we'd see if we could set those things up for him and that it was helpful to know about his donation because then maybe that would enable the DNC to pay off some of their debts."

And then on page 112 she says, "Oh, I don't know, it was more—I don't remember exactly what she said but it was something along the lines of that's helpful to know that they are getting this donation. Maybe it will help with some of the debts that they owe the White House. That's the general gist of what I got from her."

That seems inconsistent with what you have told us here today, and I just wondered if you can explain that inconsistency?

Ms. WILLIAMS. Well, as I said, I have no specific recollection of this discussion with Ms. Ryan. But as I said in earlier questioning, it was not a secret for Ms. Ryan or people at the DNC that the DNC owed the White House money.

Mr. BURTON. But the point is that this was discussed prior to your getting the check from Johnny Chung?

Ms. WILLIAMS. Well, that is her recollection. That is not my recollection.

Mr. BURTON. I see, OK. I will yield back to Mr. Portman and he can yield.

Mr. FATTAH. Mr. Chairman, a quick question. When you read the deposition, it seemed to me that Ms. Ryan was speaking after the fact of the contribution, not prior to the fact of the contribution. So maybe it wasn't clear.

Mr. BURTON. No, I'll be glad to give you a copy so you can take a look at that. I yield back to Mr. Portman.

Mr. PORTMAN. I am glad to yield to the gentleman from Florida.

Mr. MICA. Mr. Portman, thank you for yielding and, Mr. Chairman, I just want to make a general comment too about what has been said on the other side about the cost of these hearings. That

it costs too much, that it's cost $3 million. When, in fact, the cost of operation of this committee, including the investigative function, is far less than the other side spent for similar activities in the time that they controlled this committee.

I submit, Mr. Chairman, that the cost to close down this hearing, this investigative process for future generations would be much more than we want to pay, because in fact this process is what separates our Government from dozens of other governments, scores of other governments around the world where they don't examine their executive branch, their executive agency, so this is very important.

We appreciate the witness' cooperation, and we are not trying to condemn this witness; we are trying to find out the facts from this witness, and we hope to also find out from Mr. Chung where this money came from, how he could gain such access to the White House and to the President and First Lady in this manner, and then take corrective steps so this doesn't happen again, if, in fact, this does lead to foreign contributions. So I thank the chairman and yield back my time.

Mr. BURTON. The gentleman's time has expired.

Let me give everybody some information here quickly. It is the intent of the Chair after the last questioner, which will be Mr. McIntosh, to break for about 15 minutes so everybody can get just a quick bite of something, come back and get to the second panel.

I have been informed by the Cloakroom, that we will probably have a vote in an hour or hour and a half. If we take 10 minutes, we will still have an hour and a quarter before we have to break for another vote. Mr. McIntosh.

Mr. MCINTOSH. Thank you, Mr. Chairman. I would like to yield my 5 minutes to Mr. Barr.

Mr. BARR. I appreciate the gentleman for yielding.

Ms. Williams, I was somewhat intrigued by your attorney's reference to the letter that he wrote setting forth his opinion on some of the matters that we've touched on here today with regard to that provision of the U.S. criminal code that relates very explicitly to receipt of campaign donations and the place of solicitation and by whom.

I might very respectfully suggest that you discuss with him some further documents. One would be an opinion by the Office of Legal Counsel at the U.S. Treasury Department in 1979, a Democrat administration, 3 U.S. opinion O.L.C. 31, in which there is some discussion, not directly on point with regard to the use of the word "receive" in the statute. It deals primarily with the location. But there is language in there that indicates very clearly that the issue of "receive" is not black letter law the way Mr. Dennis may wish it to be. And certainly he is your advocate and I understand his position and he argues it very eloquently, as always.

Mr. DENNIS. Could you give me that citation again?

Mr. BARR. 3 U.S. opinion O.L.C. 31, and there are a number of footnotes that relate to the issues that we are speaking about here.

Mr. DENNIS. 1979?

Mr. BARR. Right. I would also, Ms. Williams, direct your attention to 18 U.S.C., section 607. There has been some discussion and

I think an effort on the part of the folks on the other side of the aisle to deliberately misconstrue this.

Section 607 has two parts to it, (a) and (b); (a) is the operative part that we have been talking about here that states very, very clearly that any person defined as we have seen in 603, any person who is paid by funds drawn on the U.S. Treasury cannot solicit or receive contributions for Federal elections in any room or building occupied in the discharge of official duties, so on its face I think very, very clearly it applies to your situation.

Section or subsection (b) of the statute, which has been referred to by folks on the other side, has nothing whatsoever to do directly with your situation. It deals very explicitly with Representatives or Senators. It very clearly does not refer and does not cover members of the executive branch. And that is the provision that allows for persons in Senate or Representative offices to receive unsolicited checks or moneys, and then transfer those within 7 days, so if anyone in your situation were relying on that as a defense, I think they would be sorely disappointed. I think if anybody in your situation were relying on the defense that it would be rude to abide by the statute, they could be sorely disappointed as well.

My point is that we have a law here. We also have an opinion and a review of Federal laws, including criminal laws, by Mr. Mikva, the Counsel to the President, not quite contemporaneously but within a month or so of what we are talking about here. That does not go into the detail that your counsel did in giving us his opinion. And I think that is very revealing.

The memorandum of April 27, 1995, that I referred to earlier and that has been put forward as exhibit 153, states very clearly that no person in your situation can receive campaign moneys. It does not have any convoluted definition of what exactly "receive" means. As a matter of fact, it says it means a commonsense definition, which means somebody hands you something and you take it. It does also, as the Federal statute, have an explicit and an express exception for things received by mail.

The fact that both this opinion and the statute that I referred to have express exemptions for certain activities leaves one very clearly under rules of statutory construction with the conclusion that other activity that does not fall within those exemptions is, in fact, covered. And I would, therefore, repeat that under your testimony under oath today, I believe that a case very clearly has been set forward of a violation of 18 U.S.C. 607(a).

Now, what this Department of Justice wishes to do with that is certainly not anything over which we have concern. That has been obvious for quite some time. But for folks on the other side to say there is no evidence of this, and the statute does not apply, I think is laughable. The statute is very clear. The opinion of the White House by Abner Mikva is very clear. One could certainly argue about the fine points of it, but I think you have a serious problem here.

Mr. COX. Mr. Barr, would you yield for just a moment?

Mr. BARR. Happy to yield to the gentleman from California.

Mr. COX. There is something else in the White House Counsel's memo that concerns me. In addition to stating clearly that White

House employees may not ever accept a political contribution from any person——

Mr. BARR. If the gentleman would yield back just for a moment, I have one point that I do want to make before my time expires and that is that I do intend to write a letter to the Attorney General requesting prosecution because I think very clearly there is a violation of the law. Mr. Dennis obviously does not agree, but I think that is a clear——

Mr. COX. Will the gentleman yield? If I could just finish the point, that the memo says that one should please consult our office, the Counsel's Office, before undertaking any action implicating an exception to this general prohibition, and I would wonder why Ms. Williams did not contact the Counsel's Office if it is, as you say, extraordinary to receive a $50,000 check.

Mr. BURTON. The gentleman's time has expired. The gentlewoman can answer.

Mr. DENNIS. If I might, Mr. Chairman, again my client is not a lawyer. I would point out that the regulations that I cited which define official acceptance and receipt under the statute in question, the interim regulation were published in 1994, which is some 15 years after this O.L.C. U.S. opinion, whatever it might say, and that the final regulations were adopted in 1996 and the citations set forth in my letter some 2 years later.

Mr. BURTON. The gentleman's time has expired. Does that conclude your comments?

Mr. DENNIS. Just one other thing. The Counsel's Office, White House Counsel's Office, also agrees with that interpretation, the interpretation that I have stated here. And it is in writing in various documents.

If I might, Mr. Barr, before you write a letter to the Department of Justice, I hope you will accept something in writing from me addressing specifically the points that you have made in your last statement, and Mr. Cox as well. I'll address that to you as well.

Mr. BURTON. Did that conclude the last part of the question?

Mr. COX. Mr. Chairman, I have a pending question to the witness. The counsel is certainly entitled to speak and I am pleased that he did so.

Mr. WAXMAN. Mr. Chairman, regular order. I think Mr. Barr had the time. His time has expired.

Mr. BARR. And I did yield for that final point and he was in the middle of asking it.

Mr. BURTON. Go ahead. You may answer it.

Ms. WILLIAMS. I am sorry; what is the question?

Mr. COX. The question is, why you did not, even though the advice of the White House Counsel was before implicating any exception to the prohibition on accepting a contribution, you should contact the Counsel's Office, why, if it's so unusual for you to receive a $50,000 check or a check at all because you have testified that this was the only time it happened, why you did not contact the White House Counsel's Office?

Mr. BURTON. Let her answer.

Ms. WILLIAMS. I didn't think of it. I was in a situation, just human, I guess. Didn't have the memo in front of me when it happened. I just acted.

Mr. BURTON. Mr. Sanders.

Mr. SANDERS. Thank you, Mr. Chairman. I would like to yield to Mr. Fattah.

Mr. FATTAH. Thank you, Mr. Sanders.

Let me—last week we had a witness here, a Deputy Counsel to the White House and she was accused of obstructing justice and now you have been accused of violating the criminal code. There are a lot of allegations flying around but, nonetheless, just so we can settle to the facts one more time. The DNC has returned every dollar that was received from Johnny Chung, even though there is no evidence at this moment that any of those dollars were illegal in any respect. And all of his contributions, with the exception of the check that was handed to you, were sent through some other mechanism. And so if one is chasing foreign contributions they would not just be focusing in on this one incident.

Congressman Cox asked you when you arranged for these strangers to meet with the President on that Saturday, did you and so on—you never testified that you arranged such a meeting, right? You didn't arrange for them to go into the press conference at all, radio address.

Ms. WILLIAMS. Right.

Mr. FATTAH. So that was never your testimony. And as far as you were concerned, and your counsel is concerned, contrary to all of this, these wild allegations, you don't believe that by accepting this check and passing it on that you violated any criminal statute or any civil statute and it was not your intent to; was it?

Ms. WILLIAMS. No, of course it was not my intent to.

Mr. FATTAH. I know you are probably amazed at the hypocrisy of the Members here on the Hill. We had the chairman of the Republican Conference handing out checks on the floor of the House from the tobacco industry in which Members on the other side of the aisle thought that this was just fine and dandy and now here they are—if they have a political problem with the President, I'm sure the President can handle it. You did nothing other than receive this check and send it to the DNC. If you were working here as the chief of staff to a Member of Congress, you would have had 7 days to do that and not violated any law. Don't you think that the rules reasonably assume that there may be circumstances in which citizens, and Mr. Chung is a citizen of the United States, may make a contribution and so that it not be an unlawful situation that you can just pass that check along? Don't you think that that law makes a lot of common sense?

Ms. WILLIAMS. Well, I've refused to give my opinion. On any of this.

Mr. FATTAH. Fine. You need not share your opinion. I just want to make it clear that you did not solicit the contribution from Mr. Chung, that you did not do anything other than forward in an administrative way through someone else in the office the check over to the DNC.

Ms. WILLIAMS. That's correct.

Mr. FATTAH. Is that correct?

Ms. WILLIAMS. That is correct.

Mr. FATTAH. And at this point in time you have appeared voluntarily before the committee?

Ms. WILLIAMS. Yes.

Mr. FATTAH. And that notwithstanding the abuse, at least what I think has been abusive allegations of criminal conduct, which is obviously an attempt to smear your good name, you have served this country faithfully for many years in a high public office, and I want to thank you for your service, and I want to wish you well.

Ms. WILLIAMS. Thank you.

Mr. SANDERS. I take back my time and yield it to Mr. Barrett.

Mr. BARRETT. Thank you, Mr. Sanders.

What I would like to do is take a minute or two. Evan Ryan, who is Ms. Williams' aide, is not here today, but she was—her deposition was taken by minority counsel. And what I'd like to do is read key excerpts from her testimony into the record. I think that they are relevant here for several moments. This is from her deposition:

Question: Second sentence, "He showed her the business cards of his Chinese companions and asked if arrangements could be made for them to eat lunch in the White House Mess."

Mr. BURTON. Excuse me. What page are you on so we may follow you?

Mr. BARRETT. I don't have the page number here.

Mr. BURTON. There should be a page reference on the top.

Mr. BARRETT. I have it retyped.

Mr. BURTON. OK. We will try to figure it out.

Mr. BARRETT. Quote,

He showed her the business cards of his Chinese companions and asked if arrangements could be made for them to eat in the White House Mess and meet Hillary Clinton. Quote, to the best of your recollection are all the elements of that response correct? Answer: No.

Which ones are incorrect? Answer: He never showed me business cards on that day and he also asked about the radio address and a tour of the White House.

Question: Quote, Chung also asked if there was anything he could do to help the White House? Quote, is that sentence correct? No.

Question: And how is it incorrect? Answer: That day he stated he was making a contribution to the DNC, quote.

Then we move down. New section.

Question: Then she said, quote, Maybe you can help us, unquote. Is that sentence correct? Answer: No.

How is that incorrect? I didn't say anything about helping us. I mentioned that we were going to check and see if we could set up any of the things he was hoping to set up.

Question: The next paragraph reads, quote, the aide told Chung that the First Lady had some debts with the DNC from expenses associated with White House Christmas parties, quote. Is that sentence correct? Answer: No.

And question: How is it incorrect? Answer: I never discussed expenses and that Christmas with Mr. Chung.

Question: The next sentence reads, quote, Chung believes that Ryan mentioned a figure of $80,000, quote; is that sentence correct? Answer: No.

How is that incorrect? Answer: I never mentioned a figure of $80,000. I never mentioned any.

Question: Skip the next paragraph because it is a parenthetical not bearing on facts.

Paragraph following that reads, quote,

Ryan told him Chung said that she was relaying the question on behalf of Williams who hoped Chung could help the First Lady defray these costs, quote. Is that sentence correct? Answer: No.

Question: And how is it incorrect? Answer: I was not relaying anything on behalf of Maggie Williams regarding defraying costs of the First Lady.

And we go down.

Question: We have already covered that. I apologize for bringing it up again.

The next sentence reads, quote, and Lewis said Ryan is sure that she had no discussion of financial contributions with Johnny Chung, quote; is that sentence correct? Yes, and no discussions he made that statement to me, but there were never any discussions.

I just wanted to make sure that—these are questions from minority counsel and I wanted to make sure those were in the record.

Thank you, Mr. Chairman.

Mr. BURTON. The gentleman's time has expired. The last person to question will be Mr. Shadegg. Even if somebody else comes in.

Mr. WAXMAN. You can't do that. I hope nobody else comes in but you can't do that.

Mr. BURTON. I will assume that Mr. Shadegg will be the last person to question and we will then break for 10 minutes.

Mr. SHADEGG. Ms. Williams, following on this deposition, because I don't know what pages of the deposition they were reading from, but I have the same deposition, a deposition of Mrs. Evan Ryan who is not here today. She is out of the country and not available. Although I think at some point in time she will be before this committee and I am trying to get some clarification.

We, for example, know that Mr. Chung was seeking some things from the White House. And everybody has agreed on that. We also know that at one point in time Mr. Chung tendered a $50,000 check and you accepted that $50,000 check. But I have some questions that go to this deposition that Mrs. Evan Ryan gave. For example, in that deposition Mrs. Evan Ryan says point blank——

Mr. DENNIS. What page?

Mr. SHADEGG. I do have a page. Page 109, line 16.

Mr. DENNIS. 109, line 16, OK. I'm sorry for being slow.

Mr. SHADEGG. What did you tell Mrs. Williams? I told her that Johnny Chung was here and that he had some businessmen from China and that he was hoping to get a tour, the radio address, the Mess, and the photo with Mrs. Clinton. And he was also going to donate money to the DNC while he was here.

Do you see that question and that answer? Now, what I want to do is clarify for the record, do you recall her telling you that Johnny Chung was there, and that he had businessmen from China with him?

Ms. WILLIAMS. On what day is this? The same——

Mr. SHADEGG. I presume it's March 9th, because the radio address was on March 11th and we know that Mr. Chung did, in fact, attend the radio address with the Chinese colleagues. Even if we can't pin down a date, did you have a conversation with Mrs. Evan Ryan, whom I think you knew well, in which she indicated that Mr. Chung was there and that he was anxious to get a tour, a radio address, a visit to the Mess and a photo with Mrs. Clinton and in which Mrs. Evan Ryan said to you he was also donating some money to the DNC while he was here?

Ms. WILLIAMS. I don't recall this conversation exactly. I know that she said that Johnny Chung was here, and told me about the photo and wanting the photo and wanting to eat at the Mess. That's what I recall.

Mr. SHADEGG. It is very important for us to figure out who is right and who is wrong. We are trying to get to the bottom of this and we have two conflicting stories.

Ms. WILLIAMS. I am not saying necessarily that they are conflicting stories. I am saying——

Mr. SHADEGG. I am trying to find out the degree to which they conflict.

Ms. WILLIAMS. She may have a more specific recollection of some of these issues simply because her job was to deal with these requests. With all due respect, as Chief of Staff to the First Lady, these were among some of my concerns but necessarily not my primary concerns. So, you know, I absolutely remember——

Mr. SHADEGG. Can we just walk through the other things that she said so that you will have an opportunity to say whether they are true or not true or you recall them or whether you just have no recollection?

Ms. WILLIAMS. Fine.

Mr. SHADEGG. She then gets asked again the question: You told her what he wanted and you told her at that time he was going to donate money to the DNC? And Mrs. Williams reaffirms that. You still have no recollection.

Ms. WILLIAMS. I'm sorry, I don't——

Mr. SHADEGG. I'm sorry, Ms. Ryan reaffirmed that.

Ms. WILLIAMS. Could you give me what is the question?

Mr. SHADEGG. There is a reaffirmation by Mrs. Ryan that she told you two things. One, he wants a tour, a radio address, the Mess, and the photo with Mrs. Clinton, and he's making a donation to the DNC. She's now said that very clearly at two different points, as you can see. Now we are looking at lines 22 to 24 which your counsel has showed you. Do you have a recollection of that?

Ms. WILLIAMS. I have a recollection definitely of the Mess and of the photo and that Mr. Chung was there.

Mr. SHADEGG. No recollection of being told about the fact that he was making a donation to DNC?

Ms. WILLIAMS. No, I don't.

Mr. SHADEGG. Let's go to page 110, lines 6 through 9. Here she gets very specific and she talks about what you said back to her. She said that you had said to her we could see if we could get those things for him, and that you said it was helpful to know about this donation because then that maybe the DNC would be able to pay off some of their debts.

Ms. WILLIAMS. No, I don't have a recollection of this, and Mr. Chung had, prior to I guess March 9, already been a contributor to the DNC and had been making donations to the DNC. So, I guess I think news about a donation from Mr. Chung would not strike me as extraordinary or unusual.

Mr. SHADEGG. So you are saying that you didn't say it was helpful to know about the donation?

Ms. WILLIAMS. No, I don't recall saying that.

Mr. SHADEGG. We then go on. You were aware of the debt, though; is that right? The debts by the DNC to the White House were significant?

Ms. WILLIAMS. Oh, I was aware. Lots of people were aware.

Mr. SHADEGG. Going on to page 112, lines 12 through 16.

Ms. WILLIAMS. Uh-huh.

Mr. SHADEGG. Mrs. Evan Ryan again says that you had said it was helpful to know and that getting this donation, maybe it will

help with some of the debts in the White House. So she again says that your response——

Ms. WILLIAMS. Well, I think you should read—first she says, oh, I don't know.

Mr. SHADEGG. Right. But it was something along the lines of that's helpful to know that they're getting this donation, maybe it will help with some of the debts. So, again, she quotes you as being aware that he's going to give a donation to the DNC.

Ms. WILLIAMS. Well—OK, I just want to make sure that there are two things, because what you have read has been the lines that are in between. What you haven't read or the first thing is "When Ms. Williams had mentioned that she seemed pleased to you"—this is the question "that Mr. Chung mentioned he was going to donate to the DNC, do you have any idea how she knew that perhaps that donation would go to pay off some debts?" "Oh, I don't know," it says.

Mr. SHADEGG. And then?

Ms. WILLIAMS. Then it was more, I don't remember exactly what she said.

Mr. SHADEGG. And then that's where I began reading.

Ms. WILLIAMS. "It was something along the lines of that's helpful to know, that they're getting this donation, maybe it will help with some of the debts that they owe the White House. That's the general gist of what I got from her. I don't know."

Mr. SHADEGG. Once again, she is saying that she made you aware that he was going to make a donation to the DNC and that you said—she's now said it twice and she's used the exact same phrase twice—that your response was, that's helpful to know.

Ms. WILLIAMS. Could you explain to me then what the meaning of her saying "I don't know" at the end of that?

Mr. SHADEGG. Sure. That was a response to the question put to you; how did you, Mrs. Williams, know about the debt to the DNC. That's a different issue.

Ms. WILLIAMS. There are two "I don't knows." There's a top one and a bottom one.

Mr. SHADEGG. That's right. But there are still—your bottom line testimony is even though she says at two different points——

Ms. WILLIAMS. I have no recollection.

Mr. SHADEGG [continuing]. That you responded saying it was helpful, that you have no recollection of that.

Ms. WILLIAMS. No, I do not.

Mr. BURTON. The gentleman's time has expired. I want to thank you, Ms. Williams, for your patience and your legal counsel and everybody else who is with you here, Lanny. I know it has been a difficult time for you. I hope you have a safe trip back to Paris with your new husband and that everything goes well with you, and once again thank you very much for your help. We appreciate it. We stand in recess for 10 minutes.

[Recess.]

[The depositions of Margaret Williams, Evan Ryan, and Gina D. Ratliffe follow:]

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
U.S. HOUSE OF REPRESENTATIVES,
Washington, DC.

DEPOSITION OF: MARGARET WILLIAMS

WEDNESDAY, AUGUST 27, 1997

The deposition in the above matter was held in Room 2247, Rayburn House Office Building, commencing at 10:06 a.m.

Appearances:

Staff Present for the Government Reform and Oversight Committee: Barbara Comstock, Chief Investigative Counsel; Jennifer M. Safavian, Investigative Counsel; Sophia Nelson, Counsel; Kevin Binger, Staff Director; David N. Bossie, Oversight Coordinator; Kenneth Ballen, Minority Chief Investigative Counsel; Kristin Amerling, Minority Counsel; and Andrew McLaughlin, Minority Counsel.

For Ms. Williams:

EDWARD S.G. DENNIS, JR., ESQ.
Morgan, Lewis & Bockius, LLP
1800 M. Street, N.W.
Washington, D.C. 20036–5869

Ms. COMSTOCK. We can get on the record here.

Good morning, Ms. Williams. I would like to begin by thanking you on behalf of the members of the Committee on Government Reform and Oversight for appearing here today.

This proceeding is known as a deposition. The person transcribing this proceeding is a House reporter and notary public. I now request we have you sworn in. We have a notary public here to swear you in.

THEREUPON, MARGARET WILLIAMS, a witness, was called for examination by Counsel, and after having been first duly sworn, was examined and testified as follows:

Ms. COMSTOCK. I would like to note for the record those who are present at the beginning of this deposition.

My name is Barbara Comstock. I am the designated Majority counsel for the committee. I am accompanied today by Jennifer Safavian, who is also Majority counsel. Minority counsel today is Ken Ballen, who is accompanied by Kristin Amerling. The deponent is represented by Mr. Dennis. The deponent this morning is Margaret Williams.

Although this proceeding is being held in a somewhat informal atmosphere, because you have been placed under oath, your testimony here today has the same force and effect as if you were testifying before the committee or in a courtroom.

I would like to note for the record, also, the committee's Staff Director, Kevin Binger, who just entered the room, so you know.

As we go along, just so you know, various members of Minority and Majority staff often come in, so, if you would like, we will identify them; but nobody else besides staff are allowed to come into the room.

Mr. BALLEN. Or Members of Congress.

Ms. COMSTOCK. Or Members, yes. It is recess, but I know we have a few.

If I ask you about conversations you have had in the past and you are unable to recall the exact words using the conversation, I would ask you please state that you are unable to recall exact words but still, to the extent you can recall, give the gist or substance of any such conversation to the best of your recollection. If you recall only part of a conversation or only part of an event, please provide us with the best recollection of those events or parts of conversations that you do recall.

If I ask you whether you have any information about a particular subject and you have overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you do have such information and indicate the source, either a conversation or documentation or otherwise, and how you derived such knowledge. In other words, it is not just personal knowledge that you learned firsthand but other information you may know. Please indicate how you know that so that we can indicate for the record and you can make clear that you got something thirdhand or secondhand or you really don't know if it is true but this is what you heard.

Before we begin the questioning, I want to give you some background about the investigation and your appearance here. Pursuant to its authority under House Rules 10 and 11 of the House of Representatives, the committee is engaged in a review of possible political fund-raising improprieties and possible violations of law within the committee's jurisdiction.

Pages two through four of House Report 105–139 summarizes the investigation as of June 19, 1997, and encompasses any new matters which arise directly or indirectly in the course of the investigation. Also, Pages four through eleven of the report explain the background of the investigations. All questions related either directly or indirectly to these issues or questions which have a tendency to make the existence of any pertinent fact more or less probable than it would be without the evidence are proper.

The committee has been granted specific authorization to conduct this deposition, pursuant to House Resolution 167, which passed the full House on June 20, 1997. Committee Rule 20, of which you received a copy, outlines the ground rules for the deposition.

Majority and Minority counsels will ask you questions regarding the subject matter of the investigation. Minority counsel will ask questions after Majority counsel has finished. After the Minority counsel has completed questioning you, a new round of questioning may begin. Members of Congress who wish to ask questions will be afforded an immediate opportunity to ask their questions. When they are finished, committee counsels will resume questioning.

I would also like to note for the record that we also have another Majority attorney present. Sophia Nelson is with us also this morning.

Pursuant to the committee's rules, you are allowed to have an attorney present to advise you of your rights. Any objection raised during the course of the deposition shall be stated for the record. If the witness is instructed not to answer a question or otherwise refuses to answer a question, Majority and Minority counsel will confer to determine whether the objection is proper. If Majority and Minority counsels agree that a question is proper, the witness will be asked to answer the question. If an objection is not withdrawn, the chairman or member designated by the chairman may decide whether the objection is proper.

This deposition is considered as taken in executive session of the committee, which means that it may not be made public without the consent of the committee. Pursuant to clause 2(k)(7) of House Rule XI, you are asked to abide by the rules of the House and not discuss with anyone other than your attorney this deposition and the issues and questions raised during this proceeding.

Finally, no later than 5 days after your testimony is transcribed and you have been notified that your transcript is available, you may submit suggested changes to the chairman.

I would just like to add for the record that we have been working with Minority counsel on this and if you need additional days—I understand your counsel is out of town. I think you may be out of town, too; is that correct?

The WITNESS. That is correct.

Ms. COMSTOCK. We can make arrangements, mailing it to you, and have waived that with the consent of the Minority in situations where you have physical proximity and distances, that you need to accommodate that.

The WITNESS. Can I ask a question? With respect to making the deposition public, now the deposition is made public by the committee when the committee chooses to do so?

Ms. COMSTOCK. It has to be by vote of the committee.

The WITNESS. By vote of the whole committee?

Ms. COMSTOCK. Yes.

The WITNESS. That would only be after I reviewed my deposition?

Ms. COMSTOCK. Exactly. And just so you know, the depositions, when they become available and we get the transcript before it has been corrected, the Minority does get a copy of the uncorrected version, as do we, but then nothing would ever been be an official copy until you have the opportunity to review and make the changes. I will go into that a little bit on the changes but, just so you know, there are copies that are circulated to the Majority and Minority staff.

The WITNESS. That are uncorrected but still not made public prior to?

Ms. COMSTOCK. Exactly. And it is the committee's responsibility—Majority and Minority responsibility to make those corrections and make sure they are accurate for the record.

The transcript will be available for your review at the committee office or, as we discussed, we can mail it to you. And when we do mail it, we ask you sign a form that it hasn't been copied or shared with anyone because, since it is an executive

session, it is not made public and none of our copies physically go outside of our offices. Even our members have to come in to see copies of the actual deposition.

The WITNESS. Okay.

Ms. COMSTOCK. Substantive changes, modifications, clarifications or amendments to the deposition transcript submitted by you must be accompanied by a letter requesting the changes and a statement for your reasons for each proposed change. A letter requesting any substantive changes, modifications, clarifications or amendments must be signed by you. Any substantive changes, modifications, clarifications or amendments shall be included as an appendix to the transcript, conditioned upon your signing the transcript. I believe we also make typographical changes within the body of it and technical changes like that.

Do you understand everything we have gone over so far?

The WITNESS. Yes, I do.

Ms. COMSTOCK. Do you have any questions?

The WITNESS. No.

Mr. DENNIS. I just want to put on the record that Jim Wilson and I had a conversation when I believe the issue of trying to set a date for the deposition was decided upon and, at that time, I asked him about the scope of the deposition. He advised me that it focused primarily on this Chung matter, and I asked him if there were other areas that might be inquired, and he said that he would let me know a little closer to the deposition.

I have not heard back from him, so we are operating on the assumption that it is going to be confined to the political fund-raising and primarily this Chung issue and some related areas. But in terms of being prepared to get outside of that, you know, if we get into an area that my client hasn't had a chance to really consider, I will let you know, but that is one thing I have some concerns about.

Ms. COMSTOCK. I am sorry if there has been any misunderstanding on that, and I think that will encompass—we are going to go through the general fund-raising issues and matters of how, you know, in the First Lady's office, any involvement in any of those matters.

Mr. DENNIS. No problem with that.

Ms. COMSTOCK. And then, obviously, the issues of Mr. Chung. There is some matters relating to Mr. Hubbell that I think we will briefly, you know, some of these areas——

Mr. DENNIS. We can go through that.

Ms. COMSTOCK. The main characters—John Huang, Charlie Trie, the Riadys—the general people I think you are familiar with in the newspapers. I think most of the things should fall within that area.

Mr. DENNIS. None of those areas would present any problems.

Mr. BALLEN. And I have a statement I want to put on the record as well.

First of all, it was mentioned—and this is the first time I have heard it—that hearsay is appropriate. In other words, if you learn things second- or thirdhand, to let us know that. I think in the Minority we would take a very dim view if we are going to start getting hearsay for the depositions.

Technically, it is not excluded here because we don't operate under Federal rules of evidence, but it has been excluded from both civil and criminal trials. And our Anglo-American jurisprudence for some 300 years and for very good reasons—because it is not reliable, no one can confront the accuser and other reasons; and I think it would be inappropriate if we started in this forum to rely on that.

So that is one thing for the record; and certainly today, if there is anything you do not know firsthand, you should identify it as such.

Ms. COMSTOCK. I think my statement was to make clear that oftentimes people have heard something from somebody else, that somebody told me that there was a contribution made, I do not know that firsthand. What we are asking for is—we aren't just asking, necessarily—that you clarify for the record so that it is clear when someone is making a statement where the information comes from. That is the statement we have been reading at the beginning of the deposition.

Mr. BALLEN. Our view—and we will have to work this out between ourselves, but today you can identify. But our view is that kind of evidence is not appropriate.

Ms. COMSTOCK. I don't think we have a disagreement. I think we just want to have the witness make clear her knowledge of that information.

Mr. BALLEN. That would be fine.

The other thing I wanted to point out is under House Rule XI, 2(k)(a), objections as to relevancy and pertinency are ultimately matters for the committee to decide. In other words, if the Chair makes a ruling on an objection to relevancy or pertinency, that is appealable to the committee; and it is the province of the committee to ultimately rule under the House Rules as to those kinds of objections.

Thank you very much.

Ms. COMSTOCK. This morning I will be asking you questions concerning the subject matter of this investigation. If you don't understand a question, please say so and I will repeat or rephrase so you understand the question.

The reporter will be taking down everything you say and will make a written record of the deposition. It is important you give verbal, audible answers because the reporter cannot record what a nod of the head or other gesture may mean.

If you can't hear me, please say so and I will repeat the question or have the reporter read back the question to you.

I would ask that you wait until I finish each question before answering and I will wait until you finish your answer before I ask the next question so that we don't end up going over each other in the record.

Your testimony is being taken under oath this morning as if we were in court, and it will be assumed you understood the question and the answer was intended to be responsive to it.

Are there any questions you have about those matters?

The WITNESS. No.

Ms. COMSTOCK. Are you here voluntarily this morning or as a result of the subpoena?

Mr. DENNIS. Well, voluntarily.

I'm sorry. You are here voluntarily.

The WITNESS. I am here voluntarily.

EXAMINATION BY MS. COMSTOCK:

Question. Okay. If we can get started. Just give your full name for the record.

Answer. Margaret Williams.

Question. And I am going to skip over what we have gone through before on previous depositions. I am going to skip over the usual sort of background, if that is okay?

Answer. I appreciate it.

Question. Okay. Could you just update us, though, on when you left the White House?

Answer. May 3rd, 1997.

Question. And where are you currently working?

Answer. In my home, packing boxes.

Question. Have you been asked by the White House counsel or anybody else at the White House to collect documents for any of the subpoenas or document requests from this committee?

Answer. Yes, I was asked by my counsel to—in response to a letter he received from the committee to check personal materials to see if they were things that were responsive.

Question. All right. And are you aware of document reviews being done in your offices at the White House?

Answer. I assume so. Generally, White House counsel does that.

Question. And who was in charge in particular in gathering documents from the First Lady's office?

Answer. I am sorry. I do not.

Question. Do you know, in general, that there has been a person designated in the First Lady's office to assist the White House Counsel's Office in gathering documents?

Answer. Depending upon the request—depending upon the request and the area, it would differ. White House counsel in the past goes through phone records, goes through—I mean, they physically do it.

Question. Could you describe how you have kept your records—how you kept your records while you were at the White House?

Answer. How I kept them?

Question. What kind of files—if you had correspondence files, phone logs, the type of different things that you maintained routinely.

Answer. Routinely, exactly that—correspondence, phone messages, schedules, news clips, subject files, foreign trip files—I can't remember—speech files. I mean, the whole compliment of files that might be in an office.

Question. And who maintained those files generally in your office?

Answer. Evan Ryan, generally; interns at other times, volunteers. It has varied.

Question. Did you routinely keep correspondence that were sent to you then? You said alphabetic files or chronological files?

Answer. Depending on what it was. I was not a very good file keeper. Depending on what—on the area, it might be chron or it might be alphabetic. On a foreign trip file, for instance, I probably did that by chron and, inside that, alphabetically. On

correspondence files, chron or alphabetically, although we had a different file for health care correspondence, for instance. So it just—I mean, kind of whatever the particular issue was, whatever was easiest to get to is how we kept them.

Question. Do you know, on the foreign trip files, was that when the First Lady went on a foreign trip?

Answer. Well, actually, it was when I did a pre-advance for the foreign trip. Most of the official records for her trip would be kept in the scheduling office. I tried hard never to actually duplicate any file. If I thought somebody else had them someplace, I usually did not keep them.

But in the foreign trip file, for instance, it would be the pre-advance. It would be all of the things that we looked at. It would be my recommendations of what she should do, perhaps the Secret Service recommendations, that kind of thing. More preparatory.

Question. Would that include people who wanted to go on those trips or be involved in those trips, correspondence you may have gotten about requests to be involved?

Answer. Generally, on her trips on the plane, there was only press that was carried with her on trips. There wouldn't be—I am sure there were people who wanted to go; but, as a general rule, I didn't get correspondence about who wanted to go. That might fall under more, you know, substantively who wanted to go. I didn't generally get those kinds of requests.

Question. While you were at the White House, beginning last fall when revelations about John Huang and some of these fund-raising issues first came to light, did anyone from the counsel's office come to your office or send any kind of memos asking you to collect documents pertaining to any particular individuals?

Answer. I am sure they did.

Question. Do you recall any memos that were sent around by the counsel's office?

Mr. BALLEN. Can we have a time frame on this?

Ms. COMSTOCK. Starting last fall.

Mr. BALLEN. Before the subpoenas were issued by the committee?

Ms. COMSTOCK. Actually, this committee initially made requests under the previous chairman in October of 1996—in November of 1996. I believe the counsel's office did. I mean, we received—and I won't play hide the ball with you here. We did receive information that they were starting to request documents back there, and some memos went out.

EXAMINATION BY MS. COMSTOCK:

Question. What I am trying to get a sense of is your familiarity with that and what actions may have been taken, particularly in the First Lady's office, in response to those.

Answer. Although I can't tell you specifically what memos were sent and at what time, I do remember a series of, it seems to me, a series of memos that were sent asking for information about John Huang, about the Riadys and two or three other names that I wasn't necessarily familiar with.

Generally, when that happens in our office, we would send a copy of that to everybody. But, generally, counsel's office is fairly good at making certain that the entire place was papered. And then there would be a deadline; and then there would be someone who would follow up from the counsel's office to say, have you looked here? Have you looked here? What have you got? Please send it to us.

That was the routine. Although I can't remember a specific date, that was our routine based on past requests that we had had.

Question. And do you know, in fact, if your office did begin providing documents, when they did begin providing documents?

Answer. I would say that, in general, that we in my office were very responsive. So if there were documents that were requested, they were turned over to the White House Counsel's Office.

Question. Okay. Now if you had documents, for example, with—that were from '93 or '94 that may have been responsive, would those have already been cataloged and filed away in another room or office?

Answer. No, probably not. Probably not.

Question. They probably still would have been maintained?

Answer. They probably would have been maintained within the office at that point. Although, I mean, '93, '94—I mean, it would depend. I mean, it would depend on what was there, if we still had them.

Question. And so while you have been there, you have not—I mean, prior to your leaving in May, you didn't box up any particular areas of things you were working in and move them out?

Answer. Yes, I did box some. What I did was to leave the—in the office, because most of them I thought might be continuous files and people would want to work off of them.

Question. I'm sorry, are you talking about when you left——

Answer. Right.

Question. I am talking about before you left, while you were there, if—you started January 20, 1993?

Answer. Right.

Question. Then you left in May of this year?

Answer. Right.

Question. Prior to leaving, had you had occasion to box up any of your correspondence or—if it had been anyplace before you left?

Answer. Right.

Question. Besides your office?

Answer. I didn't myself box up. I know that after the health care project that we did box health care files and I guess move them to wherever the files go in the White House, I assume record management. I am not intimately familiar with that. I would probably say, you can box up the health care files or, you know——

Question. Okay. I would like to discuss with you while you were at the White House any DNC employees that you had working with you in the First Lady's office in particular, if you recall that and how that came about?

Answer. I don't recall that I did have any DNC employees working in the First Lady's office.

Question. On health care matters or anything like that?

Answer. No, the DNC actually had a health care campaign that was based at the DNC, that was based at the DNC, so they had their own project and their own staffing. And, obviously, around substantive issues, we would confer with them, but I really don't know of DNC staff working on health care at the White House.

Question. Any DNC interns, anything like that that you recall.

Mr. BALLEN. Working in the First Lady's office?

The WITNESS. Oh, working in the First Lady's office. I can't recall.

EXAMINATION BY MS. COMSTOCK:

Question. Or working on health care matters in general, maybe not physically located in the First Lady's office.

Mr. BALLEN. Your question is not whether there are any DNC employees working on health care matters but whether they are working at the White House or the First Lady's office.

Ms. COMSTOCK. I am really asking if she is familiar with DNC employees working at the White House. You know, why don't I go ahead——

The WITNESS. I do know there were DNC employees who worked at the White House. I do not know of any who worked on health care or specifically in my office. I can't—I mean, I can't recall.

Ms. COMSTOCK. Let me show the witness CGRO–11946, which is a document we received from Mr. Ickes; and it is pertaining to DNC personnel related to White House support.

EXAMINATION BY MS. COMSTOCK:

Question. I am directing your attention to the first area. Sara Grote worked in the First Lady's office?

Answer. Actually, she worked in advance and scheduling, but she was detailed to work on First Lady issues.

Question. All right. And do you recall how that came about?

Answer. No, I really don't, because it was done—she actually worked for advance and scheduling.

Question. Do you recall if you were involved in any discussions about having DNC employees work at the White House?

Answer. No, I was not.

Question. Directing your attention to the section that says health care media campaign staff, it has about six names there. Did you work with any of those folks on health care matters?

Answer. Dwight Holton, I recognize; and Barbara Woolley I recognize. Jon-Christopher Bua, I recognize, but I believe that he worked at the DNC.

Question. That is B-U-A, Jon-Christopher Bua?

Answer. The only other person here that I recognize as working at the White House is Barbara Woolley, and I believe she worked for public liaison. I was not

aware until after media reports that she actually was—she actually worked for the DNC.

Question. Okay. And your testimony is that you don't recall any discussions about having DNC employees work at the White House or any matters related to that?

Answer. No. I do recall press reports about this.

Question. Referring to press reports this year?

Answer. Yes. I don't know if it was this year, but—I don't know if it was this year or last year. I can't really speak to that. But with the exception of Barbara Woolley, who I thought worked for public liaison, I thought these people—some I don't recognize, but others I thought worked at the DNC.

Ms. COMSTOCK. Okay. We will make that Deposition Exhibit 1.

[Williams Deposition Exhibit No. MW–1 was marked for identification.]

[Note.—All exhibits referred to can be found at end of deposition.]

Ms. COMSTOCK. And this is EOP 59044. It is a document received from the White House, which I believe is a message pad kept at your office; and there is a phone message here attached from May 22nd. It doesn't indicate the year on here, but it is very difficult to read on the first page, but I believe it may be '95. But I think we can all agree it is hard to read, so it could be '93, '94 or '95.

Answer. Where does '95——

Question. I'm sorry. On the front page there. That is the message pad it was from.

We could try to further clarify. I don't want to make any representations on the record, but here it is. When we tried to highlight that and figure that out, '95 is our best bet.

But I think it's a message to Maggie from Adam in Leon Panetta's office. It is regarding a meeting from the Chief of Staff Office, re: DNC Employees Working at the White House.

Now as we have discussed, it is difficult to read the year, but I am wondering if you recall anything in '95, in general, any issues around May of '95 regarding White House employees——

Answer. No.

Question [continuing]. Working at the White House you may have discussed with Mr. Panetta?

Answer. No, I don't.

Question. Okay.

Answer. No.

Ms. COMSTOCK. Okay. I will make that Deposition Exhibit No. 2.

[Williams Deposition Exhibit No. MW–2 was marked for identification.]

Mr. BALLEN. Would you like the additional staff identified for the record?

Ms. COMSTOCK. We have Mr. McLaughlin here this morning and Mr. Bossie.

Mr. DENNIS. Who is who?

Ms. COMSTOCK. Mr. McLaughlin is Minority staff; Mr. Bossie is Majority.

I will show the witness two different documents here: CRGO 1670, a memo to Martha Phipps that I received from Mr. Ickes; and this is a second memorandum of May 5, 1994, to Ann Cahill from Martha Phipps, EOP 36287 through 88.

Both of these memos begin by saying, in order to reach our very aggressive goal of $40 million this year, it would be very helpful if we could coordinate the following activities between the White House and the Democratic National Committee. I am reading from the May 5, 1994, memo. The earlier—well, actually, there isn't a date on the initial one. We have other copies of this. It does have a fax date on it of March of '94.

Mr. BALLEN. Mr. Dennis, would you like a copy as well?

Mr. DENNIS. That would be helpful. Thank you.

EXAMINATION BY MS. COMSTOCK:

Question. Actually, the first paragraph, on the earlier memo, says to Martha Phipps—just discusses coordinating the following activities. The second memo discusses coordinating the following activities between the White House and the Democratic National Committee.

I will just ask if you are familiar with either of these documents?

Answer. No, I am not.

Question. Do you know who Ann Cahill is?

Answer. She worked in the political division of the White House.

Question. And that would be—with whom did she work then? Who would be her direct supervisor?

Answer. Oh, Harold Ickes.

Question. She was in the Deputy Chief of Staff office?

Answer. No, in the political division, it would be one of the divisions that Harold as Deputy Chief of Staff was the liaison to.

Question. So she was in the political division, and the political division was an area Mr. Ickes was in charge of?

Answer. Yes, that is correct.

Question. And do you know who Martha Phipps is?

Answer. Martha Phipps worked at the DNC.

Question. All right. And did you have occasion to interact with Miss Phipps?

Answer. Yes.

Question. And could you describe what those interactions generally were?

Answer. A broad range of issues, usually having to do with Mrs. Clinton's schedule for the DNC.

Question. Is that all?

Answer. Well, there would be different kinds of events. A lot of times they would involve her traveling or standing in as a speaker somewhere. I mean, it could be any kind of event; but, generally, it was Martha trying to get her to do the event or trying to get on her schedule.

Question. And Miss Phipps worked for David Wilhelm in the Chief of Staff office at the DNC, is that correct?

Answer. I know she worked for David Wilhelm. I wasn't quite sure how they were organized.

Question. Do you recall at or around sometime in the spring or summer of 1994 any discussions about utilizing—coordinating activities between the White House and DNC to raise $40 million or to raise any amount of money?

Answer. I could not tell you of any specific conversations, but I would say that there definitely was. Especially around the areas of scheduling, that it was important that, from my vantage point, that Mrs. Clinton be available to do fund-raising events for the DNC and that it was very important to coordinate her schedule so she could do that.

Question. Okay. The memo here particularly discusses utilizing things at the White House such as Air Force One trips, White House private dinner, spots at White House events, the White House mess, Kennedy Center tickets, photo opportunities in the fund-raising effort. Do you recall generally discussing utilizing any of these sort of perks at the White House in connection with fund-raising?

Answer. Quite frankly, not necessarily in connection with fund-raising.

Our office, which had a great deal to do with being the welcoming office or welcoming at the White House—because of Mrs. Clinton's role as national hostess, we were always concerned that we have a broad range of people at any of the dinners, any of the events, and that would also include contributors.

Question. But, again, returning to this memo which is discussing—maybe if you want to take a chance to review it. The second memo has 19 items and contact people to apparently coordinate between the White House and the DNC. The initial memo only had 10 items. Maybe if we could focus on the second memo with the 19 items.

Mr. BALLEN. I want to note for the record, you say initial memo. There is no date on the memo.

Ms. COMSTOCK. We have received other copies that do have a March of '94 date. This copy does not. That is correct.

The WITNESS. Yes, she is looking at this one.

EXAMINATION BY MS. COMSTOCK:

Question. And directing your attention on this second memo, EOP 36287 through 88, number 16, it says, one lunch with the First Lady per month, contact Maggie Williams.

Answer. That would be a scheduling issue, and I would hope that they would contact me or contact the schedule of Patti Solis.

Question. Did you have generally any effort at the White House to arrange one lunch per month with donors to the DNC?

Answer. Actually, I don't believe that we did one lunch. I don't think that the one lunch issue ever came up.

I do know that what we did try and schedule was a list of DNC contributors as well as DNC political people, issue coffees, for Mrs. Clinton at the White House. So I do not know of one lunch with the First Lady per month.

And I am sorry, just based on this list—now there could have been—I don't know if they meant individual donors, but certainly we tried to do a Women's Democratic

Leadership Fund lunch at least once a month. I mean, I am sure we did. So I tried to be as helpful as possible with respect to the schedule at the request.

Mr. BALLEN. Have you ever seen this document before?

The WITNESS. No.

Mr. BALLEN. Did you ever have any specific discussions about this document?

The WITNESS. No.

Ms. COMSTOCK. Well——

Mr. BALLEN. Well, it is unclear from the record.

The WITNESS. No, I did not.

EXAMINATION BY MS. COMSTOCK:

Question. Did you ever have any discussions—this memo is discussing in order to reach a very aggressive goal of $40 million this year—this year being 1994—talking about coordinating particular activities that are listed here, 19 of them, with contact people. Did you ever have any general discussions with anybody about how this lunch with the First Lady would be part of a general fund-raising effort in 1994?

Answer. I absolutely knew that we would be helping the DNC to raise money and that scheduling the First Lady for lunches, for fund raisers, for like activities was something that we should consider when we looked at her agenda and her schedule, because raising money for the Democratic National Committee was an important thing to do.

Question. And when—would Martha Phipps, if she had somebody to schedule it, would she call you?

Answer. More than likely, she would call Patti Solis, Mrs. Clinton's scheduler. And, actually, we had a much better process than that. The first call would go to the political division as a part of what they would present as, you know, an agenda or what they would be interested in. Then it would go to Mrs. Clinton's schedule to be sorted through as a request, as other requests for her schedule.

If there were a particular difficulty with respect to timing, then I might be called in. Martha Phipps might call me. Or if there was an event where there needed to be an immediate substitute, then I would be called to see if Mrs. Clinton could fill in, especially around issues of traveling, which were much more difficult, would involve much more.

Question. So the process would be Miss Phipps would call somebody in the political office, someone like Mr. Sosnik or Miss Hancox——

Answer. Someone in the political office.

Question [continuing]. And make this request for we want somebody from the DNC, a donor or whoever wants them to be able to have lunch with the First Lady. Would they provide some kind of memo on who this was?

Answer. If it got that far. I don't remember really individual lunches that she had with donors. For the most part, I remember that she did, you know, kind of major crowd events, smallest kind of thing being the coffees, which were 15 or 16 people.

Question. Okay. And so 15 or 16 was the smallest type of group that you recall that would be organized?

Mr. BALLEN. Can we have a time frame? You are still talking about 1994 or in general?

The WITNESS. Well, I guess I am talking in general.

Mr. DENNIS. The last election?

The WITNESS. I am just talking generally. Because, I mean, from, you know, 1993 on my office's view was that Mrs. Clinton's time would be divided in a number of categories.

There would be the substantive agenda that she was interested in, there would be her role as the national hostess that she would be involved in, and there would be issues that have to do with the DNC or her husband's role as the leader of the party. So we always were interested in being aggressive about making sure that all those different parts of a schedule were, you know, taken care of.

Question. Particularly here, if we can sort of return to your—not necessarily the '94 time period but these type of events that are described here in the '94 memo as, you know, having contact people to organize them. Why don't we go through the process you described? It would go initially through the political office. Then it would come over to the scheduling office with some type of memo or paper from the political division.

Mr. BALLEN. I am going to have to object. She has been testifying generally, and you keep referring back to the memo she says she is not familiar with. If you want to ask her was there a specific process that resulted from the memo, fine, that she is not familiar with, or if you want to ask the general process for scheduling the First Lady's time.

Ms. COMSTOCK. If the witness doesn't understand the question——

Mr. BALLEN. The record is confused. I don't understand the question.

Mr. DENNIS. I think that is a fair point. I mean, the memo she has not—as I understand the record, the memo she has not seen. But on the subject matter of how her office dealt with lunches or events like that in which contributors might be invited or have a fund-raising purpose, I think she described generally what that was. But she in no way ties that into this memo or any specific conversation she had about, you know, one lunch per month as reflected in the memo.

Ms. COMSTOCK. If we could let the witness testify to that, I would also like to generally discuss the process—the general process of separately using the memo as a reference point.

EXAMINATION BY MS. COMSTOCK:

Question. And I think you made clear your knowledge or lack of—of the particular memo, but I would like to discuss this process that you described going from the political office to the scheduling office.

Answer. Okay. Can I just step back for a moment? Because maybe I can provide a little bit of clarification and make it clear.

I am familiar with the idea of a White House event called the Jazzfest or the Rose Garden ceremony or official—I am familiar with these things as part and parcel of what it is the White House does. I would never need a memo like this to say that when you are thinking about an event at the White House and invitations to that event that contributors should also be considered in the body of people that you want to have.

When we have a White House dinner, for instance, we want to make sure that congressional people are invited. We want to make sure that contributors are invited. We want to make sure that the media people are invited. And then we—you know, so we want to look across every category.

And I think what I was saying to you, that from my standpoint and given the office that I worked in, I would never need a memo like this that would suggest to me that contributors, as well as the other categories that we looked at in terms of people, should be included in any event that we had at the White House.

Now with respect to your second question, which has to do with a process, there was a process not only for having invitations sent for contributors, but there was a process at the White House for having congressional participation in events. There was a process for making sure that women were invited to things. There was a process for making sure that we looked across the United States regionally. It would be nothing to suggest—to look at a list or say do we have anybody at all from the south coming to this.

So by virtue of the kind of work that we were involved in in the First Lady's office—and I can speak to that more so than, I don't know, the political office—we would never need a memo like this to suggest that we aggressively include contributors as part of our category of invitations.

And so there was a process. The process was if the DNC was interested in having Mrs. Clinton do something or scheduling her, they would go to the political office. The political office would generally make a recommendation to us, I assume, based on whatever factors they use or criteria.

In the same way that if we were having some kind of dinner and the Congressional Office would come to us, they would get requests from the Hill. Those requests would come to the Congressional Office. The Congressional Office would make recommendations, based on whatever criteria they had, to us to say these people, it makes sense, public liaison. These were parallel, from my standpoint, although I do not know the criteria that each division was working on. But these were parallel kind of processes for feeding in to any of the things that we had to deal with, including Mrs. Clinton's schedule. So that speaks generally to that.

Question. Okay. And when the scheduling request came in, say for a donor, do you recall any memos that described this person as a DNC donor, they've given X amount? Or these group of people are all donors, they're trustees, or whatever they are, we would like to arrange a lunch with the First Lady?

Answer. Yeah, at some point. If the event was accepted, at some point, certainly, once, again, like for any other event that we would have, there would be, you know, this is a guest list for this. This person, you know, is an artist who works at such and such, this person is a contributor for the DNC, this person sits on a foreign affairs committee of such and such. There would be something that would say——

Question. Some type of briefing paper that would tell the First Lady who she's sitting down with and going to lunch with?

Answer. Yeah, more than likely. It would be not a briefing, but there would certainly be a list with a notation. If it got to the point that it was accepted, then you could work on a list. But otherwise, what you were taking essentially in the process was the recommendation from the office that this made sense to do. And once you kind of got to that threshold, then everything normally would follow—would follow.

Question. And were you involved in making recommendations one way or the other on any of these?

Answer. Sometimes I made recommendations, yes.

Question. And like you said, Ms. Phipps would come directly to you if there was a scheduling issue?

Answer. Generally, if there was some difficulty. Because, like I said before, in our office, very early on it was clear to me and clear to us that in terms of balancing Mrs. Clinton's schedule that there were a number of areas that she would be a participant in. And so I had laid a framework for the people who worked for me that these were the areas that must be considered when we were doing scheduling. These were the areas. Just like substantively, these were the areas we are interested in.

We generally don't do environmental events, so you know that we don't have to put those down. We generally do events that have to do with child health. We generally do events that the DNC requests, and we have a special interest in doing events where women are concerned. So that people had a general view of the kinds of things we were feeding into our schedule.

So if that process didn't work for us in any area, I would get a call from the "Martha Phipps of the world," or the, you know, the other person or the other person. So I tried to be there when there was a difficulty or if it involved an extraordinary amount of energy. For instance, pick up tomorrow night and go to Kansas, then someone would contact me and say, we need your involvement in this.

Question. Were you ever aware at any time of the President or the First Lady complaining that donors hadn't been given enough involvement or attention in terms of getting them to the White House for various events?

Answer. Donors?

Question. DNC donors.

Answer. Not in particular donors. This is on the record, and not to be released, but they complained that we never had enough people coming to the White House, of just regular people coming to the White House.

Question. Not enough overnights?

Answer. They couldn't have enough people come, because coming to the White House was a huge deal for people. And they knew that. And so, I mean, you know, it would be, you know—we would push to get 50 more kids in, even though it didn't make any sense to us in terms of arrangements.

Yes, they complained that we didn't get enough people in the White House. Which is why in terms of just visitors we almost tripled the amount of visitors that came through the White House. It was a big deal for them to have people inside the White House.

Question. I'm showing you a document. It is a Washington Post article and there is not a date on it. It's EOP 52397. The body of the document discusses fund-raising—directing your attention to the circled area—yes, and I believe that's the way we received it, the copy you have. It says, Democratic sources said that despite the DNC's success in raising money in 1993, the party's several million dollars in debt and one Democrat described, quote, "turmoil in the donor community," end quote, because of hard feelings among major contributors who have complained that they have been ignored by the Clinton White House.

Mr. DENNIS. What was the date of this? I'm sorry; I missed that.

Ms. COMSTOCK. Well, it doesn't have a date on it. I believe given it is talking about fund-raising in '94—I mean '93. It is sometime after '93, it could be '94 or '95. It is somewhat unclear on the article. This is a document we received from the White House.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall anything about in '94, '95, any discussion about turmoil in the donor community because people felt there hadn't been enough donors at the White House?

Answer. No. Turmoil in the donor community? I—I've worked in politics for 20 years. I've never lived in a period where there hasn't been turmoil in the donor community.

Question. Okay. Do you recognize the handwriting that's on the right of that document?

Answer. Right here?

Question. Yes.

Answer. Looks like the President's handwriting. Although he usually signs things "BC," so I don't know.

Question. On the side of the article it reads, Mack, what's this about? Who's been ignored? Let's nail down the specifics. We sure gave them—and then it's just a line and then it's signed B.

Answer. I don't——

Mr. DENNIS. Before the record, I don't know whether I misheard you, but as I read this, the article is not a complaint about donors coming to the White House. It just says, have been ignored by the Clinton White House.

EXAMINATION BY MS. COMSTOCK:

Question. Yes, that's why I'm wondering if you ever had any discussion with the First Lady or the President about donors being ignored.

Answer. No.

Mr. BALLEN. Your answer was no?

The WITNESS. No, not donors specifically. As I said in my earlier answer, they complained about not having enough people in the White House, period.

Ms. COMSTOCK. I'll make that Deposition Exhibit No. 3. And we still are reviewing the other two memos that we have not made exhibits.

[Williams Deposition Exhibit No. MW–3 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. I guess returning to the May 5th, 1994, memo, do you know Ann Stock?

Answer. Yes.

Question. And her job is social secretary at the White House; is that correct?

Answer. Right.

Question. She arranges various events at the White House?

Answer. Yes.

Question. Do you have any knowledge of her working with the DNC in any way to reserve various spots as is described in this memo for things like six seats at White House private dinners, six to eight spots at all White House events? Her name is under the White House residence visits and overnight stays, item number 7. Then guaranteed Kennedy Center tickets. And then the second page, 10 places per month at White House film showings, and then use of President's box at the Warner Theater and at Wolf Trap.

Mr. BALLEN. Excuse me. The question is ambiguous. Are you asking the witness if she's aware that Ann Stock may have done these kinds of activities or——

Ms. COMSTOCK. What I'm asking——

Mr. BALLEN. Can I finish, please?

Ms. COMSTOCK. I was asking the question.

Mr. BALLEN. But you are not allowing me to state my objection.

Ms. COMSTOCK. If the witness doesn't understand the question——

Mr. BALLEN. No, I am entitled to object. I'm sorry; under the rules, I'm going to object, whether you like it or not. The objection is——

Ms. COMSTOCK. You're objecting that you don't understand the question?

Mr. BALLEN. I'm objecting—the question is unclear and ambiguous, and I'm objecting to the form of the question. It is unclear and ambiguous. It is asking two different things and I am objecting to the question and I am going to state my objection.

The objection is—is the question is the witness aware of particular activities as described that might have been part of Ann Stock's duties, or whether Ann Stock was, as this memo seems to suggest—in order to reach our aggressive fund-raising of over $40 million—was specifically providing White House residence visits and overnight stays to contributors in order to reach this specific fund-raising goals? There are two distinct questions. It is not clear what the witness is being asked. I object to the question.

Mr. DENNIS. Can we have the question reread, please?

[The reporter read back as requested.]

Mr. DENNIS. Do you want to take it one at a time?

Ms. COMSTOCK. Yeah, if we want to do it one at a time.

EXAMINATION BY MS. COMSTOCK:

Question. Are you aware of her working on—first of all, generally, were you aware of Ms. Stock setting aside these type of items for DNC donors?

Answer. I am not aware of her setting—first of all, let me just say that this memo from Martha Phipps to me—and I may be reading into it—looks like Martha Phipps' wish list. And it suggests to me she doesn't really have a good knowledge, based on some items here, of who actually is a contact for them or not.

And I state that because while I'm well aware that White House private dinners and White House events are in the purview of the White House secretary, and possibly film showings, some of these other things, it is news to me that she is the contact person for them.

Question. Okay. And what items are those?

Answer. I didn't know that she was the contact person for White House residence visits and overnight stays or guaranteed Kennedy Center tickets at least one month in advance. I'm not quite sure how that's done.

I also don't think that—I'm not sure—but I'm not sure the President has a box at the Warner Theater. I know he does at the Kennedy Center, but I'm not sure he does at the Warner Theater. And I do not know what our access would be at Wolf Trap. I can only remember, quite frankly, one event—and I'm not the source of the Wolf Trap tickets, but I could only imagine one event where either the President or the First Lady ever went to Wolf Trap.

So with respect to all these other things, I can't speak to them because I never knew that they were Ann's responsibilities or I didn't think so. And some of them, I think, don't even exist as—as items.

But with respect to White House events as some mentioned here, Jazz Fest, Rose Garden, whatever, did Ann reserve places for the DNC? To be accurate, I would say she did not reserve places. Did Ann make certain that DNC contributors were invited, as she made certain that other groups and categories were? I would say absolutely. She considered contributors important people and people who should be a part of White House events, yes.

Question. And would she get this list of those people from the DNC, then?

Answer. Yeah, she would get a recommended—yeah, she would get a list. Uh-huh.

Question. And would that again come through the political office to her?

Answer. I think when—in the best of all conditions when it was working, yes, I think so.

Question. And what would be the other conditions?

Answer. The other conditions would be what you have a lot of in the White House, where people who call in and say, I'm a big contributor, there's an event at the White House, I need to come. Or I sit on the committee of such and such. I need to be at the state dinner. Or I do work—and so you would get those kinds of calls of people that you might not necessarily know about and then they would go back to whatever division handled that group.

So if it was a political person, it would go back to political. If it was congressional, it would go back to congressional. If it was a constituency group, it would go back to public liaison. And that's how it would get around.

Question. And if Ms. Stock was getting information about particular donors for private dinners, would that again be memoed from somebody? I mean, if it was a private dinner in the residence with 8 or 10 people, would the President and First Lady be briefed on who these people were and who was coming to dinner in the private residence?

Answer. You would have to ask her. I don't know what her——

Question. What her practices were?

Answer. Yeah.

Question. But that would all be handled by Ann Stock, those arrangements for private dinners?

Answer. In conjunction with——

Question. The various offices?

Answer [continuing]. Whatever various offices. Right.

Question. All right. So you didn't have any involvement, then, or input into who was having private dinners at the White House at various events? That went through the various offices through Ann Stock?

Answer. Yeah, generally, but then there would be times when I would be asked for suggestions or recommendations of people, depending on what the event was. And if I had them, I would give them.

Question. But is it your understanding that usually when these people would go, that somebody would brief the President and the First Lady on who it was that was coming for dinner?

Answer. Right, yeah. Generally, there would have to be a list and they would have to go through security.

Question. And you had said the White House residence visits and overnight stays, which is number 7 here, contact Ann Stock, it was your understanding that Ann Stock was not the contact for that?

Answer. Yeah, I thought it was—I thought it was—since it was their house—when you are talking about the White House residence visits, you know—a lot has been made about the Lincoln bedroom. The Lincoln bedroom actually is a guest bedroom in the President's residence. The President has two floors and so it would be like, you know, if you wake up in the morning and you've got your bath robe on, who is ever in that room is likely to see you because it's at your house.

So the residence visits were recommended by, you know, all kinds of people. Including political people, including DNC people, and I think that a decision would be in some ways a family decision. I mean, does this work out this night? You know, it was a little bit different than someone coming to the Blue Room and having dinner.

Question. Do you know the people who were involved in arranging the residence overnights?

Answer. I would imagine the same residence staff that has been there forever, the Usher's Office.

Question. I mean in particular, the people on the First Lady's staff or the President's staff who were involved in that?

Answer. Well, we didn't really have anything to do with the residence visits, unless we had made—unless we had made a suggestion and it was family or something. We had very little to do with the residence visits.

Ms. COMSTOCK. Okay. Since we are discussing a few different documents here, and I'm going to also introduce another one here, I would like to go ahead and make the first Martha Phipps memo, the undated one here—but we believe it is March '94—make that deposition Exhibit 4. Make the May 5th, 1994, Phipps memo, deposition number 5 that we have been discussing.

[Williams Deposition Exhibit No. MW–4 was marked for identification.]

[Williams Deposition Exhibit No. MW–5 was marked for identification.]

Ms. COMSTOCK. And we will continue. And then we have a document that I'm showing the witness CGRO–1569 through 1570. It's dated January 5th, 1993, memo to Nancy Hernreich from Terry McAuliffe, national finance chairman. This is generally the "Start Overnights Right Away" memo that's been in the press over, you know, the past 8, 9 months or so.

I believe as the record printed, the date has been indicated January 5th, '93, was an incorrect date on here and that people—there is various speculation on whether it is 1995 or 1994. So I won't represent what it is, but I think it was probably not '93 is I think the general consensus.

But at any rate, this discusses Carolyn Huber and the First Lady being involved in the overnights generally. I believe at the top of the memo it says, Mr. President, do you want me to pursue number one with Billy? It may be cut off on your copy. It is a little on mine. Number two, which was the overnights was with HRC and Carolyn, which I believe is Carolyn Huber, is what has been indicated. And number three, was handle, run it by Harold, I think is what was on the original. We have a cutoff version of this document. I'm sorry.

This is a document received from Mr. Ickes back in February of this year and it talked about getting people to stay, you know, who was going to handle overnights, referring to—the President's handwriting is on the second page, CGRO–1570, which says, yes, pursue all three and promptly and get other names at 100,000 or more, 50,000 or more. And then that was cc'd to Harold, Leon Panetta, and Webster—which I believe was Billy Webster, and then it reads, Ready to start overnights right away. Give me the top 10 lists right away together with the 150 over.

Does that refresh your recollection—actually in the first page, number two, as to whether the First Lady and Carolyn Huber were involved in overnights?

Mr. BALLEN. I am going to object that in the question you said that it was the President's handwriting. If you want to ask the witness whether she recognizes it as such, but to the extent that the question assumes a fact not in evidence——

Ms. COMSTOCK. I believe the President and the White House and everyone else has indicated that it is his handwriting. But if you would like to identify it for the record, that is fine. We could drag it out for the witness longer.

EXAMINATION BY MS. COMSTOCK:

Question. And I apologize. Would you like to identify the handwriting on the second page, CGRO–1570, and if you recognize the handwriting on the right that I have just read and indicated was the President, do you recognize that as the President's handwriting?

Answer. Okay. Which are we looking at? This?

Question. The handwriting on the right.

Mr. DENNIS. This right here, yeah.

The WITNESS. This? It could be. I really don't—I mean, I have seen this document in the newspaper. I can't personally identify——

Mr. DENNIS. The handwriting?

The WITNESS.—the handwriting. It could be. These both look the same.

EXAMINATION BY MS. COMSTOCK:

Question. Has anyone at the White House—you have seen press reports on this document and this whole issue of the President writing "start overnights right away"?

Answer. Uh-huh.

Question. Have you had any indications from anyone at the White House that the document that became public and was in the newspaper was not the President's handwriting on that document? Has anyone ever told you that at the White House?

Answer. No.

Question. Do you have any reason to believe that "start overnights right away" wasn't the President's handwriting? Has anyone ever told you anything, like he got a bum rap? That's not his handwriting on the "start overnights right away" document?

Answer. To be frank, I've only read press reports. I've read what the press reports have said. I have never discussed this memo with anyone at the White House, nor have I ever seen the actual memo or a copy of the actual memo until now.

Question. Okay.

Answer. Outside of press reports.

Ms. COMSTOCK. And it has been—I will for the record say that it has been identified by the White House as the President's handwriting. If the Minority would like us to have the President certify in some way that this officially is his handwriting——

Mr. BALLEN. That's enough. We have a deposition where we are asking the witness questions. I thought that was the purpose of it. Not to engage in other—you asked the witness a question, does she know the document? Is she familiar with the handwriting? Did she have any discussions? It should be simple——

Ms. COMSTOCK. Well, I'm not mischaracterizing this document as being the President's handwriting.

Mr. BALLEN. I didn't say you were mischaracterizing. I said there was no evidence in the record from this witness that it is. That's all.

Mr. DENNIS. I think from my client's standpoint, I mean, I understand your question to be that, you know, you are representing that that's the President's handwriting and that would be the basis for, you know, the question that you really want to get to. And you can—you understand what I'm saying in terms of what is being represented?

The WITNESS. Yeah.

Mr. DENNIS. Okay. You're not testifying that this is his handwriting, but it is being represented that it is as a part of another question. And I guess the question is—what is that other question? I've kind of forgotten, because it was buried in a question that was really going to another point, I believe.

The WITNESS. Okay.

Mr. DENNIS. Do you want to repeat?

Ms. COMSTOCK. I'm sorry; we probably lost track here a little of what the question was. I think initially I had asked if this document in general refreshed your recollection as to whether the First Lady and Carolyn Huber were the people involved in scheduling the overnights.

Mr. DENNIS. That's the question.

EXAMINATION BY MS. COMSTOCK:

Question. I think you may have already answered, but just so we can go back and make the record clear now.

Answer. Yes, I know that Carolyn Huber was involved in the overnights. And as I said before, because these were overnights in the President's home, it was a family—I assume a family decision, so the First Lady would be involved.

Question. Okay. And do you have any knowledge, other knowledge about that process?

Answer. No.

Question. In terms of do you know lists were brought to them and they said——

Answer. No.

Question [continuing]. Checked off on Steven Spielberg or, you know, Mr.——

Answer. No.

Question [continuing]. Rapoport or people like that?

Answer. I'm not aware of that process.

Question. But your general understanding is that because it was the family residence, that the family——

Answer. I would assume so.

Question [continuing]. To some degree was involved?

Answer. I would assume so, yes.

Ms. COMSTOCK. I'll make this Deposition Exhibit No. 6.

[Williams Deposition Exhibit No. MW–6 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. This is a document from the White House numbered EOP 29074, which is titled, "Overnight guests in response to request." It is not a dated memo, but it just has a list of names and indicates name and dates of stay.

Have you ever seen this document before?

Answer. No.

Question. Do you know—are you aware of anybody at the White House being asked to prepare a list of overnight guests who may have been donors?

Answer. Prepare a list of overnight guests who may have been donors?

Question. Uh-huh.

Answer. No.

Question. I would note for the record that some of the names that were on Deposition Exhibit 6, the "start overnights right away" memo, which had listed the top 10 supporters and had John Connelly, Carl Linder, Skip Hayward, Miguel Lausell, Arthur Coia, Finn Casperson, Paul Montrone, Larry Hawkins, Stan Shuman, and Ernie Greene, some of those names then in turn appear on this list. So I am not necessarily representing that this is a donor list, but actually I believe most of these names have—are identified in one way or another as donors and fund-raisers. But do you have any knowledge of any such list being prepared at the White House?

Answer. A list of overnights for donors?

Question. Yes.

Answer. No.

Ms. COMSTOCK. I'll make that Deposition Exhibit No. 7.

[Williams Deposition Exhibit No. MW–7 was marked for identification.]

Mr. DENNIS. I think that her answer to the last question obviously does not include what she may have read in the newspaper.

Ms. COMSTOCK. Sure, I understand.

EXAMINATION BY MS. COMSTOCK:

Question. And I think generally, I mean, if you do have knowledge, you know, that is only from the newspaper, you know, you can indicate.

This is a memo of April 21st, 1994. It's on White House stationery. It's to Mark Middleton from Ann Stock. It was cc'd to Maggie Williams and Phil Lader. It was, re: potential guests. EOP 56609 through 56617. And it begins, the paragraph reads, "I think our meeting on Thursday was very productive. Thank you for bringing a list with you of key fund-raisers. It gives us an opportunity to see exactly who has been invited and who hasn't. I had Helen run a check on the attached list." Beside each name are four columns "invited" "accepted" "regretted" and "dinner."

And then the attached memo has uninvited list and has names of lists alphabetically for numerous pages. And then has dollar amounts next to them in a column all the way down.

Answer. These are the dollar amounts of what they've—of what they've given?

Question. Well, I'm—it is—this memo says, "I had Helen run a check on the attached list." Why don't we start with, since the memo is cc'd to you, do you recall ever seeing this memo?

Answer. No.

Question. Do you recall ever having a meeting with Mark Middleton or Ann Stock about getting lists of key fundraisers for the purpose of getting them invited for White House events?

Answer. I remember being in a meeting with Ann Stock and other people about lists in general and how we got them and gathered them from both the DNC, the DLC, the State chairs, you know, early friends, whatever. I remember being in a list—in a meeting that included Ann Stock and several other people about lists, and one of which lists was talked about was getting contributor lists.

Question. Okay. And so this was a meeting at the White House?

Answer. Yes.

Question. Do you recall if Mark Middleton was involved in that meeting?

Answer. No, I don't believe that Mark was involved in that meeting.

Question. Besides Ann Stock, do you recall any of the other people involved in the meeting?

Answer. I think we had representatives from each of the divisions. I think somebody was there from public liaison. I'm a little confused by the dates because I thought there was another deputy, but maybe it was Phil Lader still. I don't know who was deputy when. But I do remember a meeting about lists.

Question. And could you just describe, you know, your full recollection of that meeting?

Answer. It was basically trying to make sure that there was an organized way for people who were making recommendations for any event at the White House to get their list in, to get all the information that was needed to send them invitations. There was a huge discussion there about late invitations, that people came with recommendations far too late to politely send them an invitation for an event.

And so it was a kind of cracking down on getting complete lists, recommendations, so that, you know, decisions could be made about invitees.

Question. Do you have any recollection of Mark Middleton being involved in that process at all?

Answer. No, I really—no, I don't.

Question. Do you have any knowledge of Mark Middleton supplying any type of list of fundraisers, to have those type of lists available at the White House?

Answer. No, I have no firsthand knowledge of him supplying lists.

Question. And you said you generally discussed in the meeting how to get a hold, I mean how to get lists about donors?

Answer. It was—what we generally discussed in the meeting was how the list process worked, which included donors but was not limited to donors, because many of these events had a huge mix of people. And so whether it was a representative from the constituency group or the congressional group or the media group or whatever, you know, it was kind of a "Come to Jesus" meeting on getting lists that were full, with addresses and phone numbers, and getting them in a timely fashion.

Question. Okay. In this particular memo, the April 21st, 1994 memo, it has, as we were discussing, a list of names and how much has been given and then it has columns, if they were invited accepted, regretted, or dinner. And then there's handwriting——

Answer. Right.

Question [continuing]. Indicating—making some indication on whether people have been invited or not. Do you recognize this handwriting?

Answer. No, I don't. But I have a question about this list. I'm still trying to figure out—maybe it's—I'm still trying to figure out this—I mean what this lists.

Question. The column with the figures, the numbers?

Answer. The column with the figures, because these are not—I mean, these have like $30, $25.

Question. I think we are trying to figure it out also. My best understanding is that this is probably $30,000, $116,000, $145,000, because these people probably didn't give amounts of—Bernard Aidenoff probably didn't give——

Mr. BALLEN. Then how do you explain $31.30, which is on the list?

Ms. COMSTOCK. Well, I think we will have to obviously ask Ms. Stock about it because it's her list, but——

Mr. BALLEN. May I respectfully suggest——

Ms. COMSTOCK. It could be $31,300, I would suggest. But when Ms. Stock is in, she can tell us if it was a person who gave $116. The FEC list would probably indicate that Ann Getty probably gave more than $50.

Mr. BALLEN. May I respectfully suggest that we ask Ann Stock this?

EXAMINATION BY MS. COMSTOCK:

Question. I am not trying to suggest to you what this is. You were cc'd on this. I am not making representations about it. But the memo that it's attached to discusses a list of key fundraisers and the amounts. They ran a check on the attached list and beside each name they had these various indications of whether they had been invited or not.

Answer. I just have one more question, just about the list. Was this—so this list was attached to this memo?

Question. Yes.

Answer. Okay.

Question. And this is how we received it from the White House.

Answer. So this is not a separate list of something? Okay.

Question. Do you know who Helen is who worked with Ann Stock, or if there's a Helen who worked with Ann Stock?

Answer. There was a Helen Dickey who worked for Ann, I think for about a year.

Question. Okay. And do you know if she would have been working for her at or around 1994?

Answer. I'd have to check. I don't know.

Question. And do you know how she would run a check on the attached—what facilities they had in the office on running checks on who had been where at the White House, invited, accepted, regretted, what type of system they had?

Answer. No, no.

Question. Do you know if Ms. Stock's office utilized the White House database for purposes of inviting people?

Answer. I'm sure they utilized the database. I hope, yeah. I know it was some computer program they had.

Question. So your understanding is they did have some type of computerized system?

Answer. Yes.

Question. So when they talk about running a check on things, on the names, that it was some type of computer, your understanding is that——

Answer. Well, I don't understand how they ran a check. I mean, did they have a computer in their office? They did. I don't want to assume, because I really don't know what they did.

Question. Okay. In the third paragraph in the meeting, I mean of the memo, it says, "If you can provide me with addresses we can start to correct this situation immediately." You had discussed that there was an effort in the meeting you recall, whether or not it was this meeting.

Answer. There was an effort to get addresses? Accurate addresses. Yes.

Question. Is that correct?

Answer. Yes.

Question. "Also, per our discussion, each Friday I will send you guest lists for the following week so that you and Phil can identify any key fundraisers who are in town." Do you know anything about Mark Middleton or Phil Lader identifying key fundraisers to Ann Stock or anyone?

Answer. No.

Question. Were you ever asked to identify key fundraisers to Ann Stock for inclusion——

Answer. No.

Question [continuing]. In events?

Answer. No.

Ms. COMSTOCK. I will make that Deposition Exhibit Number 8.

[Williams Deposition Exhibit No. MW–8 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. This is a May 17th, 1996 memo to Leon Panetta and Evelyn Lieberman from Harold Ickes re: Marsha Scott VIP operation at the Democratic National Committee. It's EOP 36085 through 87. And the memo discusses a number of things, but directing your attention to the second—why don't I let you have an opportunity to review it first before I ask you any questions about it.

[Witness reviews document.]

The WITNESS. Okay.

EXAMINATION BY MS. COMSTOCK:

Question. Have you ever seen this memo before?

Answer. Yes, I have.

Question. And do you recall when?

Answer. Around convention time.

Question. Of last year?

Answer. Yes.

Question. Of '96?

Answer. [Nonverbal response.]

Question. And then the beginning of it reads, "On 15 May, the President approved the following with regard to Marsha Scott and with regard to the VIP operation at the Democratic National Committee——

Mr. DENNIS. Convention.

Question. "Convention," I'm sorry. And then it says, "These recommendations are made with the understanding that over the past 3 years a sophisticated process, in-

volving several key people, has evolved at the White House for ensuring contact and follow up with friends and key political and financial supporters of the President and the First Lady."

And then it goes on to say, "For example, Maggie Williams and Ann Stock manage a number of functions in connection with the residence, invitations to Camp David, etc."

Could you describe, if you do indeed manage—if you did over the three years in a sophisticated process that Mr. Ickes is discussing, if you had managed a number of functions in connection with the residence and invitations to Camp David or other things with Ms. Stock, what he may be referring to there, if you know?

Answer. I'm flattered. Sophisticated process. Essentially, first of all, nothing to do with invitations to Camp David. Nobody ever went to Camp David much, except for the Clintons. And they didn't go much.

With respect to the number of functions in connection with the residence, Ann Stock reported to me in theory, and everything that happened at the residence by tradition, everything that happened in the house was considered a First Lady—a First Lady event, even though what Ann actually is is the event person at the White House for both sides, the East Wing and the West Wing. was I aware of most events in the residence? Yes, I needed to be aware. My management of them was minimal, but I take credit for all the really good events we had. But Ann Stock, her staff and the residence staff actually really made these events work and I think did a very good job of that.

So the sophisticated process here, I think, was slightly embellished. What I believe, as I read this memo, as I read it, my interpretation of this memo was that Marsha Scott wants to work at the convention in Chicago and she wants to focus on VIPs. The people who generally would handle VIPs—and that would include from our standpoint, actually, family and friends, because the DNC at the convention took care of its VIPs. They had their own program, so we had very little to do with it. But we did take care of the mothers, the brothers, the college friends, the high school friends, the long-time Arkansas friends. So this was an area that we expected that we would handle at the convention, since we tended to handle that group generally when they were around.

So I think what Harold was suggesting here was that Marsha Scott become a part of—of, you know, of that. It appears a few friends and other political—I remember when I read this, I didn't understand this, especially as it related to the convention, because I believe that the political and financial people were really having a lot of attention paid to them by the DNC.

Question. Okay. And directing your attention to page—the second page of this memo, which is EOP 36086, the middle paragraph there says, "Although early on there undoubtedly were a number of friends and other political and financial supporters who may not have received the attention and follow up they should have (or at least thought they should have), given the close and much more effective coordination among the political and other departments of the White House, with Nancy Hernreich, the social office, etc., it appears that few friends and other political/financial supporters are not being," quote, "taken care of," end quote, "in appropriate ways."

Do you know Nancy Hernreich?

Answer. Yes.

Question. And she is the President's secretary; is that correct?

Answer. She the President's assistant, yes.

Question. And do you know what her role was in sort of taking care of political or financial friends of the President or First Lady?

Answer. Well, let me say that my interpretation of this specifically has to do with, I would add the words "early friends and supporters." Nancy Hernreich is from Arkansas. Marsha Scott is from Arkansas. There were a lot of people who had supported the President when he was Governor, when he was Attorney General, and there was a concern that these friends, you know, not be forgotten when they came to Washington, so if they came to town, that they should be included in anything that was going on.

And Nancy did have a particular interest in this because she was from Arkansas, and had been with the President and knew all of his friends from his Attorney General days through his governorship in Arkansas. And Marsha Scott, in addition to that, focused on those people.

Ms. COMSTOCK. Okay. I'll make that memo Deposition Exhibit Number 9.

[Williams Deposition Exhibit No. MW–9 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Directing your attention to the third page of that document, in the middle of it it says, quote, "Any friend or supporter of the President who feels overlooked or not attended to in the appropriate way will be referred by Marsha to Nancy Hernreich, Ann Stock or other appropriate person in the White House for follow-up."

Were any of these people ever referred to you from Marsha Scott or Nancy Hernreich or Ann Stock?

Answer. No.

Question. Okay. And again if we could return to the May 5th, '94, Phipps memo, let's go through a number of the other items on there. Do you have any knowledge about Air Force One and two trips including donors, or any efforts made to include donors on Air Force One?

Answer. I know that contributors were—did get to fly on Air Force One. I don't know about Air Force Two.

Question. And how did you learn about that?

Answer. I don't know specifically how I learned about it. I don't know. I just——

Question. Do you have any recollection of anyone ever calling up to put a donor on Air Force One?

Answer. Calling me? No.

Question. Or calling——

Answer. No.

Question [continuing]. Anyone in the First Lady's office?

Answer. No, we had people who called—actually not—actually not so much contributors, but just people who wanted to fly with her on the plane. Friends, we got a lot of friends who would be interested, or depending on what she was doing, people who had substantive, you know, issues. But she has such a teeny plane that, you know——

Question. Oh, for the First Lady's plane, you mean?

Answer [continuing]. Yeah, couldn't accommodate anybody.

Question. Did anybody ever call the First Lady's office to get on Air Force One or make an effort or pitch to get a donor on Air Force One?

Answer. I don't have any specific recollection. But I can't imagine that someone at some point didn't.

Mr. BALLEN. There were two questions there. There was one, donor or anyone, or——

EXAMINATION BY MS. COMSTOCK:

Question. I'm sorry; I meant donor. I was just referring to getting a donor onto Air Force One, and if that wasn't clear, I'm sorry.

Answer. Like I said, I don't have a specific recollection, but we have all kinds of people who would call, who could be contributors, to say, "What I would really like to do most is get on Air Force One." Or, "My wife and I gave in 1992, and we would really like to get on Air Force One."

Question. And that's more of the context. If you recall anyone ever calling you saying "I've given this much" or "I'll give this much" or "I'm a big donor" or "So-and-so is a big donor, can you get us on Air Force One?"

Answer. People would always say, "I'm a big donor, get me on Air Force One." I mean, it was pretty typical. I mean, it is a very typical thing for people to always preface what they're saying by "I'm a big donor." It's the same way when someone calls me and says, you know, "I'm a Congressman, I sit on such and such a committee, I need to be on that plane." It just happens. And, you know, I think of my job as listening politely.

Question. So you have a general recollection of that, but you can't recall specific people who may have called?

Answer. Yeah; right.

Question. Number 4 on here, it says invitations to participation in official delegations, trips abroad, contact Alexis Herman. Do you have any knowledge about any efforts to include donors, and specifically where someone said, "So-and-so is a donor, we'd like to get them on an official delegation trip abroad," any knowledge of that type of effort?

Answer. Once again, I am not going to be helpful in the specific recollection, but in a general way to say that contributors, along with other people, were not considered for official delegation trips abroad would—I may not have to say that. And also people who are big contributors, also, in addition, sometimes have some substantive input that they can bring some place.

So while, you know, there is kind of this sense that donors or contributors have nothing but their money, there are a lot of donors and contributors that we dealt with who had some expertise to bring to an official delegation. And that certainly would be taken into account or I would hope it would be a smart thing to do. So that you would get a group of people, supporters, people with expertise, that you're picking from a cross-section of people who both support the President and may have something to offer on an official delegation trip.

Question. But I'm talking more about specifically if you have any general recollection or knowledge about efforts made to go to Alexis Herman or somebody in her office to get, you know, in coordination with the DNC where a DNC person would not really, in this general process which you have described, you know, a number of times today about reaching out and including people, but, you know, efforts where it was DNC people calling and saying, you know, "We are raising money. We are trying to get this. Getting this guy on this trip would be helpful." You know, "He's been a big donor; we want to get more money from him."

You know, maybe he has substance to offer, maybe he doesn't. Obviously it would help if he does, but do you have a general recollection of any instances like that where it's people from the DNC calling to get a donor, you know, identifying the person as a donor and identifying that we'd like to get them on the trip?

Answer. I do not have a specific recollection, but you know, I really want the record to show that I have a general recollection of not only the DNC, but Members of Congress, but members of specific interest groups, all calling and saying would you put this person or that person because he's good at what he's doing, he will continue to be helpful to us, or any number of reasons.

Question. Sure, I understand.

Answer. It would just be very hard. To me, I cannot pick them out. Like I said, maybe it's just from being in politics for 20 years where you kind of—I mean, who hasn't heard this? I mean, people were getting in on Jimmy Carter's plane. This is not——

Question. Do you recall any general discussion, given this memo is discussing coordinating activities between the White House and the DNC, and your getting a goal of $40 million, do you ever recall generally—and maybe in relation to any of these things—saying, "Hey, you know, it is July, we haven't gotten to our $40 million goal yet, and we need to do this?" Any kind of discussion or pressure to get—we need more people, we need more donors in here because that will end up getting up more money at the DNC? Do you have a general recollection of any discussions like that?

Answer. I have—I have no recollection that there was an extraordinary amount of pressure in any campaign season. Because of how wacky the campaign laws are, and how expensive it is to go on television, every campaign, at some point someone says we need to get more money.

Question. But I'm talking about specifically——

Answer. Everybody——

Question [continuing]. In relation to these itemized things at the White House. Not we want the First Lady to come out to Ohio and speak to a woman's group, but we need to have more lunches with the First Lady at the White House so that we can get more money, or we need to have more seats—they need to have more private dinners where we can get donors in so that we can get more money. Do you have any type of general recollections of any type of discussions about those kind of matters?

Mr. BALLEN. May I interject here? Was there a specific plan to reward DNC donors with perks as laid out in this memo? A way to fund raise, to use the White House to get the perks out to fundraisers? I think that is what these questions are going at.

Ms. COMSTOCK. Mr. Ballen, when it is your opportunity question, you can ask your questions. But I would like to ask my questions.

Mr. BALLEN. The questions are going around the issue rather than dealing directly with the issue. You keep producing a memo——

Ms. COMSTOCK. You may ask your——

Mr. BALLEN. Can I finish my sentence? Is that possible here?

Ms. COMSTOCK. You aren't making objections. You are just making speeches. Is that what you want to continue doing?

Mr. BALLEN. I am making a record. You have been asking the witness about a memo that talks about a plan to coordinate these activities, to provide these kinds of——

Ms. COMSTOCK. And you are going to be free to ask the witness about the very same document and ask your questions.

Mr. BALLEN. But your questions are not clear. Your questions——

Ms. COMSTOCK. And the witness has the opportunity to tell me when she doesn't understand my questions.

Mr. BALLEN. Well, you—all right. I want to make clear for the record whether or not there was any kind—if the witness is aware of a specific plan to award donors——

Ms. COMSTOCK. And you will have that opportunity at the time of your questioning.

The WITNESS. Okay. Proceed.

EXAMINATION BY MS. COMSTOCK:

Question. My question was: Do you recall any general discussions of efforts to get more events at the White House of any type to raise money?

Answer. Quite frankly, no more than usual, starting in 1993. We always had strong interest in getting more contributors there, more people of color there, more women there. We had a strong driving interest to do that, and it started in 1993. It is no secret that we, perhaps more than any other White House, had triple the number of activities, the number of nights to see Christmas decorations. We worked very hard at it.

Now, I can speak only from my vantage point. Did I think of myself or my office in any specific plan to raise money for the DNC? Yes, I thought that as a support to the party, whenever we could we should try and invite contributors of the party to the White House. That they should be included, like other people, as much as possible in everything we did.

Question. Do you recall having discussions with people from the DNC about specifically having more private events at the White House? Things such as private dinners, overnight stays, things such as that specifically, not the Christmas parties or the big things or bringing a lot of people in, but specifically, you know, the get more donors into these small little events or get them in for movies and popcorn with the President, those type of things. Were there ever those type of discussions with DNC people?

Answer. There were those type of discussions with DNC people and other people. DNC, if they had not been advocating to get more of their contributors into everything, would really not have been doing what they should have done. They are advocates.

Question. To get people into the White House?

Answer. They are advocates in the same way that a congressional person calls up and says, "I need four more places at the Jazz Festival." Democrat or Republican. They are advocates. It is their job to push for their constituency. Did the DNC push for their constituency? Yes, they did. Sometimes we responded well; sometimes we didn't so well, I'm sure they thought.

Question. Do you recall who you had those discussions with?

Answer. No, no, just general discussions. Depended on who called. I didn't have, you know, a person.

Question. Was it a large group of people who would call or was it a particular office?

Answer. It was sporadically. Just people would call. Because otherwise we did have a process in place for including them, which was a good thing. There was a process in place so that they could—so that they could advocate. There was a process so that they could advocate, so that—I mean from my—for me, and I can't speak for everyone else, so that the kind of calls I would get of this nature would be sporadic. Otherwise, you know, there was a process.

Question. Do you know who else was involved in the White House in these discussions that you recall with DNC people?

Answer. I mean, I couldn't say. I mean, I could only make an assumption, the political department. That's the most logical place.

Question. And did you ever provide any names of people, or specifically donors, for any events? Not here's somebody who's—but generally here is a $50,000 donor, here is a $100,000——

Mr. BALLEN. Donor to who and what and when?

Ms. COMSTOCK. Donor to the DNC.

Mr. BALLEN. What time frame?

Ms. COMSTOCK. At any time.

The WITNESS. Did I ever recommend a donor? I don't know a specific case, but I can't imagine—I'm sure I did. Someone said, "Give me 10 people you think who would enjoy coming to something at the White House," I could in a second come up with two media people, maybe a donor that I knew of, maybe somebody who worked with Hillary at a women's event. I'm sure that I did at one point or another.

EXAMINATION BY MS. COMSTOCK:

Question. Did you ever keep any list of donors that were to be utilized for——

Answer. No.

Question. I've gotten through five of them; here is the next five.

Answer. No, no, nothing that——

Question. You had generally—you had said that you thought of your office as being a support for the party in a way. Could you elaborate upon that, what your understanding was of——

Answer. No, I thought that one of the things that must be taken into consideration in putting together a schedule for Mrs. Clinton was that she would be called upon to support the party publicly in speeches or meetings or whatever else. And so——

Question. But I'm talking generally about use of the White House and White House events, if you could——

Mr. BALLEN. I'm going to object. The witness didn't finish her answer. You cut her off.

Ms. COMSTOCK. I thought maybe she misunderstood. I didn't have want to have a misunderstanding of my question.

EXAMINATION BY MS. COMSTOCK:

Question. I was directing it towards how you saw the White House as—events at the White House as being support for the party.

Mr. DENNIS. I didn't understand it to be the question either. This sounds like a different question. You want her to answer that question?

Ms. COMSTOCK. Yes, and I'm sorry.

Mr. BALLEN. There are several questions pending.

Mr. DENNIS. There are actually a couple of questions. Let's try it this way. Could we do this? Can we go back to the question you just asked and the question before that so I can——

Ms. COMSTOCK. Maybe I should just strike my last question and the answer, so there is not any misunderstanding in the record because——

Mr. DENNIS. It is confusing to have two questions.

EXAMINATION BY MS. COMSTOCK:

Question. I asked what understanding you had of how the White House could be utilized as a support for the party.

Answer. As I said before, primarily, in my office, Mrs. Clinton would be a part of the White House, and I felt that her schedule and how we allotted time prevented our support of the party.

Ms. COMSTOCK. Off the record.

[Discussion off the record.]

Ms. COMSTOCK. Back on the record.

EXAMINATION BY MS. COMSTOCK:

Question. You indicated that Ann Stock reported directly to you; you're her direct supervisor, is that correct?

Answer. On paper, yes.

Question. And can you describe generally the practice of how Ms. Stock reported to you?

Answer. We generally worked on—if something was really wrong, she would talk to me. She had a pretty good handle of, you know, how to run those events, and I absolutely trusted her. So, I mean, we would talk, I would think that we talked every day about something or the other, and then I would, you know, hear about—you know, I would definitely know about her plans and what the events were, but I felt myself more consultative than in charge. But if there was a problem and she needed some support for something she was advocating for, I would always help. But also on the staffing side, I was probably most helpful to her in that regard.

Question. In hiring people for her office?

Answer. Well, just in making sure she got the help she needed. A lot of times the kind of help she needed might be seasonal, you know; Christmas would be a high season, Easter would be a high season. The White House, I understand, as a rule doesn't have a lot of flexibility with that, but that is kind of what she needed. So in those areas I think I was much more of a support and much more focused on her work in those times.

Question. Would she generally cc you on just generally what was going on, or send you memos to here are the events we have for this week, so you know what is going

on; here is who is overnight at the White House, so in case they are wandering around, you know who is here?

Answer. Right. I mean, that particular kind of information wouldn't come from Ann Stock, but in general there were opportunities to see what the whole—I mean, what the whole schedule was.

Question. And who would that information come from then?

Answer. On events it would, you know, come through a President's scheduler, or if it was an event Mrs. Clinton was involved in, through that scheduler. But, you know, Ann was able to work with, you know, each of the schedulers in whatever division was putting it on, and if there was a difficulty, generally I would be brought in.

Question. And did she ever bring you in on any issues that arose in relation to DNC requests of the White House?

Answer. Well, yes, in particular, which I don't think necessarily initiated the meeting, but, you know, she tried to be a very orderly person, and she felt when the DNC made recommendations, they didn't give complete information.

Question. And besides that, were there other areas of DNC requests she talked to you about?

Answer. That was her big kind of thing. She felt that people needed to have the lead time to receive an invitation from the White House, that the protocol was very late, and if she asked every department to give her a list of the recommendations in order to begin to build an invitation list, that the DNC tended to be very late, and she thought that it made the White House look bad to send very late invitations, and so she was very much concerned about that with them.

Question. Okay. And were you aware of how she worked with the White House Ushers' Office, how, in coordinating events?

Answer. I think like everybody else has before. I mean, you know, they really know the house. I mean, they know, you know, what a tent will cost. You know, I mean, they just know the house, and if you are planning any events, I mean, they know what it can take.

Question. And in regards to the DNC, did there come a time when the DNC wasn't paying bills for events that had been held at the White House?

Answer. Oh, well, come a time. They were habitual late payers, but so was the Olympic committee, and so was the, what is it, the Madison Group from the Library of Congress. I mean, the bills certainly weren't as big because the DNC had, you know, large chunks of bills because they were responsible, as in the Bush administration, the RNC, for almost anything that wasn't official, and then we had, you know, the Olympic committee, the Kennedy Center, the whatever theater, whatever group was putting on something at the White House.

Question. Do you recall any discussions with Mr. Walters about the DNC not paying bills?

Answer. About what?

Question. About the DNC not paying bills for events?

Answer. Yes.

Question. Can you just describe those conversations?

Answer. Just in general the gist would be——

Mr. BALLEN. These are conversations with Mr. Walters?

The WITNESS. That is how I understood the question.

Ms. COMSTOCK. Yes.

The WITNESS. Okay. These would be the DNC hasn't paid its bills, the Education Department is late with the bill, the Olympic committee wants to have another event here, it hasn't paid its bills. I have sent out three notices. Can you call them, or do you want me to send out more notices?

EXAMINATION BY MS. COMSTOCK:

Question. All right. And then did he generally then memo you on these types of things?

Answer. Sometimes he did, yes, sometimes he did. I don't know if there was with frequency, but I saw Gary enough through the halls that if he wanted to tell me, he did. I remember seeing one or two memos, and he may have sent me more that I didn't see, but mostly I would just talk to him.

Question. You said the DNC was a habitual late payer?

Answer. They did not pay on time.

Question. And what was your understanding of what the time frame was of when they were supposed to pay, 30 days or——

Answer. I actually had no real sense of it, just my own kind of internal for when I might want to see something paid. I would think, you know, 60, 90 days.

Question. Do you recall how often you had—were these regular conversations you had with Mr. Walters about the DNC?

Answer. Intermittent. They were intermittent because, I mean, Mr. Walters essentially did what he normally would do. As I understand it, he would send out his own kind of dunning notices and make his calls and follow up, and then if he, you know, hadn't heard from him, he would, you know, want to know what was going on.

Question. Is it your understanding he would first directly call whoever it was who was paying the bill?

Answer. I don't know if he called them, but I know he would contact them and that he would send the bill, maybe send a letter, I mean, I don't know what, and then he might even call himself, I assume.

Question. Did he generally apprise you of when things were running late?

Answer. Yes. I mean, he would say in passing—you know, I think he wasn't necessarily my responsibility, but I think he knew if he said something to me about it that I would, you know, try and get people to pay attention to it.

Question. And what did you do when he told you about that?

Answer. I might call somebody at the DNC.

Question. Do you know who you would call?

Answer. It would just depend on who I saw, and I might call them, I might see them, I might tell Harold, somebody in the political division, you should call somebody over there, if I saw—I can't think of that guy's name. He works with the DNC.

Question. A finance person?

Answer. Dark hair. I'm sorry, I will just make a note of it. I can see him, but I can't think of his name.

Question. Is it Mr. Sullivan?

Answer. No.

Question. I don't know.

Answer. I know you probably can't help me. You can't help me, but it was someone.

Question. Do you know if it was who worked in the Finance Office in particular?

Answer. I believe he was in the Finance Office.

Question. Or billing services?

Answer. I don't know how they were cut up that way.

Question. Do you know if you ever wrote any memos or notes to DNC people about paying the bills?

Answer. Who?

Question. If you did.

Answer. I never did write anything.

Question. When Mr. Walters talked to you, you would talk to somebody orally about, get after this, somebody should look into this, and direct somebody else to do something about it?

Answer. It would just depend. I mean, if I happened to talk to Gary and walked into Harold, I would say, Harold, the DNC has not paid its bill, or I would write it down, and I would say, today I will call the DNC, I will call the Library of Congress, and I will call this one. It is very haphazard.

Question. Were you familiar with the First Lady being asked to make DNC fund-raising calls?

Answer. I am, from the newspapers, from a question that she was asked in a news conference, and from a memo from Harold Ickes that made a suggestion about it, but whether or not she made the calls, I am not aware of that. But those are the two places I have heard about that.

Question. Okay. And did the memo you mentioned from Harold Ickes, is that something you recall being contemporaneous with the request for the calls?

Answer. I don't quite understand that.

Question. Do you recall that—Harold writing a memo about something asking the First Lady to make calls last year or in '95?

Answer. I would be very bad on a memo. I mean, it just—you know, it's just one in his continuing series of memos. I mean, it doesn't stand out in my head.

Question. You got a lot of memos from Mr. Ickes?

Answer. Yes.

Question. Do you recall having any discussion with Mr. Ickes about the First Lady making DNC fund-raising calls?

Answer. No.

Question. Okay. At or around the fall of 1995, do you remember discussions about the media fund and—to get a lot of media in the fall of 1995? And if it helps you, that is the time of the budget battle, and Mr. Morris was encouraging a large media buy for the fall of 1995, and particularly encouraged a $10 million fund be utilized

in that time. And sort of putting it in that context, do you recall Mr. Ickes asking you about having the First Lady make phone calls to assist in this media fund?

Answer. No, I mean, I certainly do recall Dick Morris wanting to put a lot of money into media. I didn't realize it was called the media fund.

Question. Okay. Were you involved in some of the discussions with Mr. Morris advocating the media, you know, large media buys?

Answer. I was involved inasmuch as I attended the Wednesday night strategy sessions, but they were more focused on substance than—but I certainly know that, you know, Mr. Morris used that as a forum to say we needed to get more media.

Question. What was your understanding of sort of the discussion back and forth about having this large fall '95 media campaign?

Answer. Well, actually, at this particular meeting, it was not——

Question. I'm sorry, what is this?

Answer. The meeting that—the times that I heard Dick Morris advocate for more money for media was our Wednesday night strategy meeting. The focus of the meeting was not a discussion of the media budget, it was the—the focus of this was to talk about policy. There would be times that we would screen the advertising, but mostly to screen it in the context of whether or not we thought it worked, said the right things, whatever, so it was more substantive. So peripherally Mr. Morris would advocate for a media budget, but a discussion of it was not—that was not the place where they had that discussion.

Question. Can you describe, when you said you viewed the media, where that occurred, what the process was?

Answer. I mean, not much of a process. They would set up a television and VCR, and if there was a commercial on a certain subject, they would ask us—Mr. Morris would ask us to look at it and invite comments.

Question. And who was involved in these meetings?

Answer. Well, the President, the Vice President.

Question. Mr. Ickes?

Answer. Mr. Ickes, Mr. Panetta, Mr. McLarty, you know. Actually, New York Times ran a picture of the seating of that meeting where they had everybody there.

Question. That was the group?

Answer. That was it. You remember that.

Question. I recall that.

Answer. That is it. Mr. Sosnik.

Question. Mr. McCurry was involved in that sometimes?

Answer. Yes, sometimes, yes.

Question. Okay. And were there discussions of what should be added to the commercials?

Answer. Yes, critiquing them.

Question. Was the President involved in that discussion then; the President, Vice President were present at these discussions?

Answer. Oh, right, because it had to do with substance and policy, yes.

Question. Did the President ever make any suggestions on changes in that, in the media, in the commercials?

Answer. Oh, yes, he had his say.

Question. In the meetings do you recall what he said about any particular one?

Answer. I mean, you know, there are dozens of them.

Mr. BALLEN. Excuse me, I am going to object to the relevancy of advertising and the President. I object to this line. It is not relevant to the committee's inquiry into the campaign finance fund-raising abuse or any possible violations. The President may have made a suggestion about an ad or not.

Ms. COMSTOCK. I am just asking the question about the President's role in these meetings you are describing.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall him discussing—was he usually a vocal participant in the meetings?

Answer. The focus of the meeting was substance and policy, so a lot had to do with his interest in whatever policy or substantive matter was going to be made public, you know, so, yes, he certainly was interested.

Question. Any comment on the commercials that Mr. Morris would show?

Answer. He was interested, yes.

Question. Did he make comments on change that, or try this, anything like that?

Answer. I don't remember specifically, but I can't imagine that that wouldn't be the case in a situation where everyone could critique.

Question. All right. And in any of these meetings, do you recall any general discussion about the benefit or wisdom of this large media campaign in or around the fall of '95?

Answer. No, because—well, I don't recall specifically. I mean, there could have been. I don't recall specifically, but just that the—and I don't remember everything that happened at these meetings, but what sticks out in my mind is what the core of the meeting was, which was substantive and policy-related issues, so——

Question. Do you recall Mr. Ickes ever discussing his opinion on the wisdom of spending this kind of money on an early media buy in '95?

Answer. You know, I don't really recall specifically, but I do know from newspapers now he is characterized as having been against it. That was not the sense that I got, nor did I ever hear that.

Question. So at the time in the fall of '95, you had no knowledge of his being opposed to that plan?

Answer. Yes, not to that plan, no.

Question. Did you have any knowledge of anybody generally being opposed to why are we doing this in the fall of'95?

Answer. My good, I can't imagine that someone wasn't, I mean, it is the Clinton White House. I mean, I can't imagine someone wasn't opposed to it. I mean, I just didn't focus on those discussions or happen to be involved in them, I guess.

Question. And were you aware—in the fall of'95, were you aware of increased—any increase in efforts to utilize the White House for fund-raising purposes or have events at the White House or——

Answer. An increase in efforts?

Question. Yes.

Mr. BALLEN. I am going to object. What does counsel mean by "using the White House for fund-raising purposes"?

Ms. COMSTOCK. Have events at the White House.

Mr. BALLEN. Where there would be fund-raising?

The WITNESS. We can't have those at the White House.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall the DNC making additional requests for events at the White House?

Answer. Sure. I can't imagine that they didn't.

Question. Do you have any knowledge of if there was any effort in connection with this media fund to have more events at the White House in the fall of '95?

Answer. Well, since, as I said before, I wasn't aware—I mean, I didn't focus on there being a media fund that we were all supposed to be raising money for. I just don't have that idea in my head of a media fund. The question is did the DNC—was the DNC interested in having events at the White House? Yes.

Question. Okay. Let me return a little bit to the bills. After the DNC had an event, do you know the process by which the bills would be submitted for that event?

Answer. No.

Ms. COMSTOCK. I am showing the witness a memo from the DNC, actually DNC finance call sheets, DNC by State number, 3234, 6944. The next page is 34 through—I'm sorry, these are somewhat out of order. Actually, I don't know—do you have 44 on the top of your copy? Why don't we correct it. I think it starts 323, 6934, and then it goes through 45. That one that was on the top page should be the second to the last page. And these are call sheets for Hillary Rodham Clinton. The documents indicate they were prepared by Marvin Rosen.

EXAMINATION BY MS. COMSTOCK:

Question. Do you have any knowledge about DNC call sheets prepared by the First Lady?

Answer. I have never seen this, no.

Question. Do you have any knowledge of Mr. Rosen talking to the First Lady about making DNC fund-raising calls?

Answer. No, I don't have any knowledge.

Question. Okay. Then directing your attention to reason for the call, it says us to—on the first page, 3236934, says, "Ask to contribute an additional $50,000 for the DNC media fund," and actually a number of these, as you go through, I think most of them are asking for money for the DNC media fund. There isn't a year date on this.

Answer. It says December 4. Well, on one of them.

Question. I believe the time frame is 1995. I think they have been written about in the press.

Well, we don't have the year on here, but it is talking about contributions made in '94 and '93, and presumably no one was asking her to make fund-raising calls in December of '96, unless you have knowledge about anybody asking, but I am assuming that. So given the dates on here and what seems to be logical appears they may have been, they probably were, December of '95.

Is it your testimony then you have no knowledge of any efforts for the First Lady to raise money for the DNC media fund?

Answer. Not—first of all, not through call sheets or calling. I have never seen these. As I said before, the idea of the DNC media fund is something that just doesn't strike me as what I am familiar with. Was Mrs. Clinton asked to help raise money for the DNC? Absolutely. And, you know, I am assuming here this DNC media fund is a part of the DNC. Yes, as I said before, they did,.

Question. All right. Do you have any knowledge about the First Lady ever making fund-raising calls for the DNC?

Answer. No.

Question. So you have never seen her make a fund-raising call or talked to her about a fund-raising call?

Answer. I haven't, and I have never seen this packet.

Question. And then maybe just review any of the names in here that were directed to call. See if you have any knowledge of the First Lady contacting any of these people on here for—you know, if you had contact with them in connection with the First Lady or the White House?

Answer. Well, I had contact with them in connection with the First Lady, but not in connection to the—to fund-raising. Sue Bailey was at the Department of Defense at some point, then she went to work for Clinton/Gore. I don't——

Question. Because this document indicates that Dr. Bailey resigned her position at DOD in June to work with the Re-elect Committee on women's fund-raising. Is that your knowledge of Ms. Bailey?

Answer. That is right.

Question. Was she involved in any events at the White House, to your knowledge?

Answer. I am sure any event that had to do with women, that she was probably there.

Question. Okay. And the events, sort of coffee-type events or lunches, is that what you are referring to?

Answer. I was just thinking more generally. I would have to see the list of the coffees to know if she went to that. I don't know if she did or not.

Question. Were you ever aware of any luncheons or events that Dr. Bailey was involved in where donors were primarily—like women's leadershipship funds, donor types?

Answer. Right. Women's—I would have to look at a list to tell you whether or not Dr. Bailey was there. I believe there was a Women's Democratic Leadership Forum gathering at the White House. They generally were all over the country, but I believe there was, but I would have to see a list to find out whether she was there or not, I just couldn't say. I don't know these people.

I think maybe I heard of Denise Rich.

Question. That is on DNC 3236931.

Mr. BALLEN. Can I understand the question pending?

Ms. COMSTOCK. If Ms. Williams had any contact with the people who are identified on the finance call sheets at the White House.

Mr. BALLEN. In general or in connection with the financing.

The WITNESS. I understand the question in general. I don't know if I am wrong.

EXAMINATION BY MS. COMSTOCK:

Question. Yes, in general.

Answer. I don't know. It just sounds familiar. I think because she won a Grammy. Susie Tompkins I have met. I don't know in what context.

Question. Do you have any knowledge of her being involved in fund-raising or——

Answer. It says here—I think I do recall something about her holding the fund-raiser for Clinton/Gore in San Francisco.

Question. That is indicated on 3236941. That sounds familiar to you?

Answer. I mean, I know about Ralph Lauren, but not in connection to his donation. He helped one Christmas in decorating for the White House Christmas.

Question. And did a lovely job, too.

Answer. Right, which is how I heard that.

Those are the only people that I recognize.

Question. Okay. Directing your attention to page 3236937, it is for somebody—it is Ayse Kenmore. The additional notes on that page indicate that?

Answer. I'm sorry?

Question. The additional notes indicate—it says she has been to a number of events at the White House. Do you know generally how the DNC learned about how many events people attended at the White House?

Answer. No.

Question. Do you have any knowledge of whether anybody at the White House ever used the White House database to tell DNC people about how many events somebody had attended at the White House?

Answer. No.

Ms. COMSTOCK. Okay. I will go ahead and make that Deposition Exhibit No. 10.

[Williams Deposition Exhibit No. MW–10 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Did you know Marvin Rosen at all?

Answer. Yes.

Question. Was he at the White House often, or did you see him at the White House often?

Answer. No, I saw him as he—I think I saw him at a couple of dinners maybe. You know, occasionally I would see him, but not a lot.

Question. Okay. Do you recall any sense as to where he had meetings with the First Lady, particularly at the White House?

Answer. Not particularly. I would have to look at his schedule.

Question. And we have generally discussed the coffees that you referenced earlier?

Answer. Yes.

Question. What was your understanding of what the purpose of what the coffees was?

Answer. The coffees were to gather supporters of the President and Mrs. Clinton for issue discussion.

Question. Were you aware of any discussion at the White House about people talking at these coffees in reference to fund-raising?

Answer. Not in reference to fund-raising, but that they were DNC lists, they were people the DNC was proposing.

Question. And did you have an understanding that these people generally were donors?

Answer. Well, from the look of some of the lists of Mrs. Clinton's coffees, a fair number of them were not donors actually. I don't know about the President's coffees, but we had, you know, from the list, because I don't know who actually attended ultimately, but we tended to have people who worked on different kinds of issues, people who maybe were State chairs, people, and some contributors, too. But I think that the coffees that she attended had a healthy mix because I remember at one point, I think she was asking to get people who had worked on health care, so it was really a kind of an issue meeting. She never thought she had long enough to discuss the issues at length that people wanted to talk about.

Question. Did you usually attend these coffees?

Answer. No, I didn't go to any of them.

Question. Do you know who attended, staff, with the First Lady, who attended?

Answer. From our staff, her policy person went, Melanne Verveer.

Question. She was generally the person who attended?

Answer. Yes.

Question. Do you know how these were set up or who made the arrangement, is that Miss Solis?

Answer. Yes.

Question. S-O-L-I-S.

Answer. I assume it just went through the process of if the DNC or Clinton/Gore had suggested it, that it probably came through our political office, Patti Solis agreed on a date and on participants.

Question. And did the invitations go out from the DNC or from the White House?

Answer. I can't imagine they would go out from the DNC. It would be seen as a White House event. An invitation to the White House goes out from the White House.

Question. So do you know somebody then from the White—how are invitations done at the White House, if you can generally describe the process?

Answer. Well, once again, if the list process works, and so they have agreed by schedule that, let's say, Mrs. Clinton will go to coffee, this event is sponsored by the DNC, and so they would submit a list of who would be included, and then that

list would go to the White House social secretary and her people will usually write the invitation.

Question. So if I were an invitee to one of these First Lady's coffees, I got an invitation from—one of those pretty ones from the White House?

Answer. I would—I mean, the rule is that if you are invited to the White House, the invitation must come from the White House. I didn't hear of anybody breaking that rule, so it is my assumption that is what you would get.

Question. That is sort of the social secretary prototype rules, that Emily Post type things?

Answer. It is very much so and very much enforced.

Question. So if you get something inviting you to the White House from the DNC, it is sort of a bogus invitation, that is the White House rule?

Answer. Right.

Question. Were you ever aware of anyone at the DNC providing back feedback to your office or other offices at the White House about how much money had been raised as a result of the coffees, people had been contacted before, after?

Answer. Not to me, not to my office.

Question. Did you ever see any spreadsheets showing how much was contributed, generated from any particular coffees?

Answer. I don't recall seeing a spreadsheet.

Question. Have you—I mean, some of the spreadsheets, Mr. Ickes' spreadsheets, he turned over to the committee have been in the newspapers somewhat. Did you ever see anything like that while you were at the White House?

Answer. I mean, not that I can recall. I mean, I can't say if it was in an Ickes memo where I was cc'd. I may have; it just doesn't jump up at me.

Question. Were you ever aware of any type of targets or numbers, amounts of money that would try to be raised as a result of any events at the White House?

Answer. As a result of an event at the White House?

Question. Yes.

Answer. Not at the White House. I was more aware of if there was an event outside of the White House.

Question. I am talking——

Answer. What the target would be, yes, I would know that.

Question. I am talking more about the events in the White House, and generally, I had——

Answer. No.

Question. I will provide that. I don't want to be talking past you without a document here, but we have a number of spreadsheets which indicate, you know, targeted amounts of $400,000 to be generated from a coffee and then how much was raised, which was often $400,000. Did you ever see anything like that in a spreadsheet?

Answer. I don't recall seeing anything like that.

Question. Did you ever have any discussions with anyone or hear anything about, you know, each of these coffees is worth a certain amount to us?

Answer. Oh, no.

Question. Anything like that?

Answer. No.

Question. Okay.

Question. Do you know who Ernie Greene is?

Answer. Oh, yes.

Question. All right. And when did you first meet him?

Answer. Sometime in the '80s.

Question. And are you social friends with him or no—just know what type of acquaintance?

Answer. I knew him when he worked for Jesse Jackson, on Jesse Jackson's campaign. That is how I first came to know him. I would think we would be friends.

Question. And do you know if he was involved in fund-raising at all for the DNC or Clinton/Gore?

Answer. I believe he is a trustee. I don't know. Either one or the other or maybe both. I don't know for sure.

Question. Did you generally have a knowledge of individuals who are trustees?

Answer. Yes, yes, kind of, yes.

Question. And how did you learn about that?

Answer. Well, I think that DNC has—I was trying to think about this the other day. DNC sponsors at the White House at least once a year a dinner for managing trustees of the DNC, and I think, you know, just in my kind of goings and comings I picked up on it. I didn't have a real formal way of knowing, but I think I knew generally who they were.

Question. Did you ever attend any of those events?

Answer. You mean sit down at them?

Question. Or just attend, in any capacity, a reception?

Answer. Yes, I mean—I thought about this since my last deposition, all these events were like the same event to me. I mean, not just the DNC event, all the events. I would usually stop by an event at the White House to see how it was going. I would, almost without fail, as a matter of protocol, be invited to every event. But they pretty much had a standard form, so I would walk into a DNC event, I would walk into a Kennedy Center event, so I was around.

Question. Okay. Did you become aware of an individual named Charlie Trie from any of these trustee events?

Answer. No.

Question. Or Johnny Chung?

Answer. I don't know if I met Johnny Chung at one of the events, but I did meet Johnny Chung at some places.

Question. Did you ever get any lists from the DNC on trustees?

Answer. Not that I recall a list. I am trying to think if they had any publications that would list their trustees or any kind of letterhead. There is something that makes me think I have seen a list of the trustees at some point.

Mr. BALLEN. Did you see them in the newspaper?

The WITNESS. I just don't recall where.

Mr. BALLEN. These were public events?

The WITNESS. At the White House?

Mr. BALLEN. Yes.

The WITNESS. Oh, yes, they were trustee events.

EXAMINATION BY MS. COMSTOCK:

Question. Were you aware of any private dinners or private lunches or anything with trustees, or set up particularly for trustees?

Answer. I just have to look at a list to see.

Question. Were you aware of any connections that Mr. Ernie Greene had with Charlie Trie?

Answer. No.

Question. Do you have any knowledge of any business matter that he was working on with him?

Answer. No.

Question. So in your knowledge, with Ernie Greene, you never even knew he knew Charlie Trie?

Answer. That is correct.

Question. Have you ever talked to Mr. Greene about Charlie Trie to date?

Answer. No.

Question. And do you know Mark Middleton who worked at the White House in the chief of staff office?

Answer. Yes.

Question. When did you first meet him?

Answer. I think he started with Mack McLarty in '93. I mean, I met him at the White House when he worked for Mack.

Question. And what kind of interaction did you have with Mr. Middleton while he was employed at the White House?

Answer. While he was the chief of staff assistant or executive assistant, we were very friendly. If I needed to speak with Mack McLarty, he would make sure that I got in to speak with him. He was, you know, just seemed to be an extremely competent and very friendly towards me.

Ms. COMSTOCK. Okay. I am sorry, I wanted to return, just briefly, to Mr. Greene, before we move on to Mr. Trie. I want to show the witness EOP 59099, which is a message pad from sometime between 8–17–95 to 8–29–95. This is a message pad, either from somebody in the First Lady's office or in Melanne Verveer's message pad. Message to Melanne of 8–29, which says, Mr. Ernie Greene, at suggestion of Alexis Herman, was calling, and then the part of the memo says, "Trip to China," and "Supporter from Arkansas, Charlie Trie."

EXAMINATION BY MS. COMSTOCK:

Question. I was wondering if that refreshed your recollection as to whether or not you ever had any discussions with Mr. Greene about Charlie Trie or if there is any knowledge about Melanne Verveer talking to Mr. Greene or Mr. Trie relating to anything related to China?

Answer. No, but this is to Melanne.

Question. Yes, this is not your message. I was just wondering if you have any recollection of talking to Melanne about Greene and Charlie Trie?

Answer. No.

Question. Do you have any knowledge about Mr. Greene trying to get anybody on to trips to China?

Answer. No.

Question. Okay.

Answer. On trips to China?

Question. Any kind of official delegation trips to China?

Answer. No.

Ms. COMSTOCK. Make that Deposition Exhibit No. 11.

[Williams Deposition Exhibit No. MW–11 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. I am going to return to discussing Mr. Middleton. We previously discussed the April 21st, 1994, memo which—where Mr. Middleton provided the fundraiser list. Do you have any knowledge of Mr. Middleton at a meeting with fundraisers or anything while he was at the White House, or that being any type of role that he had?

Answer. No, not especially. I mean, he sat out front of Mack's office. Everybody walked in there.

Question. Okay.

Answer. I don't know if that was a role of his.

Question. Did he have a role of sort of catering to bigwigs or anything like that, in terms of being in the chief of staff office?

Answer. I think he had to be nice to everybody, I think.

Question. What was your knowledge of, or if you have any knowledge, about Mr. Middleton being involved in his White House duties with anything connected to Asia policy?

Answer. I have no knowledge of his White House duties.

Question. Okay. Did you have occasion while you were at the White House to ever meet the Riadys?

Answer. No.

Question. Do you have any knowledge of what Mr. Middleton's interaction was with the Riadys?

Answer. No.

Question. Do you know somebody named Joe Giroir, G-I-R-O-I-R?

Answer. No.

Question. From Arkansas?

Answer. No.

Question. A former law partner at Rose, an Asian businessman?

Answer. No.

Question. Does business in Asia?

Answer. No.

Question. Okay. After Mr. Middleton left the White House, what was your understanding of what he was doing when he left the White House?

Answer. Some kind of international business.

Question. Did you keep in touch with him?

Answer. Yes. From time to time, yes.

Question. And for what occasions did you keep in touch with him?

Answer. Well, he would call my office and want to use my Mess account.

Question. Can you describe what that is, what that involved?

Answer. People at the White House have an account at the cafeteria, and——

Question. Now this isn't the cafeteria that anyone can eat at, this is the White House Mess within the West Wing?

Answer. Yes, it's in the basement of the White House.

Question. And only certain people, sort of senior level staff have access to that, generally, have privileges?

Answer. Actually, that was the way it had been in the past, but when we came we extended it to anybody who actually worked in the West Wing because it was easier for them to get to than going across the street. So people in the Old Executive Office Building tended not to have them. Everyone who was an assistant to the President, even if you worked in the Old Executive Office Building, had them, but if you worked in the West Wing, whoever you were, you had access to the Mess.

Question. And I guess we can return, you said Mr. Middleton would call——

Answer. And Mr. Middleton called and said to me or Evan, Evan Ryan, who worked for me, would say, I want to use your Mess account to go to the Mess.

Question. And what was the policy on that?

Answer. Well, at the time there was no policy that I knew of. There was no policy that I knew of, since, you know—I mean, you pay for—I mean, it's like a personal account. They send you a bill; you write them a check.

Question. You got a bill at the end of the month or after the event?

Answer. I think they do it—I think they do it at the end of the month. Maybe they do it every 2 weeks. I get it and then I write a check.

Mr. BALLEN. So you pay for the lunches you have there?

The WITNESS. Yes, if you have an apple, a cup of coffee, you fill out a slip of paper and you pay for it. You get back, you know, five cups of coffee and you write them a check. So he would call and say, I want to eat at the Mess today, can I use your account, and I would say, sure, have Evan clear you in or you call Evan and Evan would say, Mark, wants to use your Mess account, do you care, and I would say, I don't care.

Question. So somebody from the Mess would call?

Answer. No.

Question. How does that work?

Answer. The Mess account is your own account. No one from the Mess calls. So if you wanted to go to the Mess, you would call me. I mean, if you were my friend, you would call me and say, can I use your Mess account.

Question. And would you give the account number, too?

Answer. No, you have to make the reservation. I think that really is probably the only policy. The reservation is in your name and only you are—I guess Evan or your office can make the reservation, and then you have the additional responsibility, your office, you know, doing the usual White House process, which is to submit the names of anyone who comes. You submit their names to WAVE so they can be brought in.

Question. So you would—you or someone in your office would call down and make the reservation?

Answer. Make a reservation and they would clear Mark in.

Question. And then the WAVE's office would kind of physically get them in. They would go there and you would have provided the names to the WAVE's office if they can be cleared in?

Answer. And I would get a badge or something and let them go in.

Question. And now when they come into the West Wing, they have to be escorted; is that correct?

Answer. No, if they would be cleared in for the Mess, and I don't know what all the badges mean at this point, but as I understand it, if you are cleared in just for the Old Executive Office Building, which sometimes happens with WAVEs, then in order to get to the White House, which is another level of security, then you would have to be escorted, but you can get cleared in, depending on how good the person is doing the clearance and the one accepting it, to go straight to the White House. And they would demand, you know, more information for that security job.

Question. And so when Mr. Middleton would call to get his to come there, was it your understanding he was bringing people with him?

Answer. I actually had no understanding. If Mark Middleton called to use my Mess account, he called to use my Mess account. If he brought people in, I mean, I guess I assumed he brought people in. People bring their mothers or friends to the Mess.

Question. You didn't have any understanding whether it was his mother or business associate?

Answer. No.

Question. He never told you anything about why he wanted to come, that he was having other meetings at the White House or anything like that?

Answer. No. I mean, I just thought he wanted to use my Mess account so I let him use my Mess account.

Question. And did you do this often with other people, too?

Answer. With other people, yes.

Question. How many?

Answer. Oh, I don't know, anyone who was at the OEOB who wanted to go, come in, other colleagues who had left who wanted to, I probably let them use my Mess account. I wasn't—I rarely myself ever got a chance to go to the Mess to have lunch, though. I mean, it was just not a——

Question. Would these individuals pay you back for——

Mr. BALLEN. Did you finish your answer?

The WITNESS. I forgot what I was going to say. I allowed other people to use it. I mean, it wasn't necessarily special to me, but I would let other people use it.

EXAMINATION BY MS. COMSTOCK:

Question. I am wondering, was it running up big bills you then had to pay back or how does that work?

Answer. I guess I just mostly wrote the checks. This happened a lot for people, especially OEOB, when you have people who work for you, because it is the only place that is open late at night. It is open at late and the cafeteria on the OB closes, and so generally, you get a lot of, put it on, use Maggie's Mess account, and then like 10 people eat off of it. So I wasn't necessarily as focused on the bills. I would let people use it and the bills would, you know, 100, 200, something like that.

Question. And then particularly with Mr. Middleton, would he, like, write you checks afterwards?

Answer. You know, I don't know if he did or not. If he did, he would have given it to Evan Ryan or someone else in my office. Usually what I got was a note that said your Mess bill is such and such, sign a check, get a check to me.

Question. And then did you go out and sort of personally collect from everybody what they had?

Answer. No, actually, I rarely collected from anybody. I rarely collected from anybody. I really didn't think about it. If Evan thought about it, she would. If not, I would just write the check.

Mr. BALLEN. So this wasn't a big deal to you; this was just an accommodation?

The WITNESS. It started out, like I said, primarily as an accommodation, and the staff in the OEOB could use it and it was the only place open late so you just get to do it, you know, because you are the one who has it. And, you know, Mark was a former colleague and a friend.

EXAMINATION BY MS. COMSTOCK:

Question. I mean, were you running up hundreds of dollars of tabs here?

Answer. It is not like my legal bills, okay. It is small change compared to that. But you would find, in the White House, you would find a lot of people who do that for other people.

Question. Okay. Can you generally distinguish, was it mostly people internally as opposed to former colleagues who were coming in?

Answer. I have no distinguishing. I mean, it was just—it was at the level of minutia for me on this thing. It just didn't matter to me. I didn't make any distinguished—it was basically a level of familiarity for me. It could be internal; it could be external. They have since developed a rule about it, but I was not aware of any such rule at the time.

Question. Okay.

Ms. COMSTOCK. I am just going to show the witness phone messages EOP 59039. Actually, these are not sequentially ordered. It is a grouping of phone messages, referencing Mark Middleton, calling, trying to get into the Mess. Some are to you, some are to others. On 59041, it is to Marj from Mark Middleton, says, please make lunch reservation for seven on Friday. It says, "Make under Maggie's name."

EXAMINATION BY MS. COMSTOCK:

Question. Do you know who Marj is?

Answer. Marj used to work for me.

Question. Okay. And that is 5–17–95.

And then there is one to Evan on 6–7, Monday, Mess, two people, and October there, it is very hard to read, then July, 12:00 o'clock, for three people, the names are there. Do you know who Larry Jaynes or Jim Messec is?

Answer. No.

Question. Then there is 1–17–96, to Evan. It says, "Please make a reservation for him in the Mess for January 24, a table for four." So your testimony is that you don't—you didn't really know who he was bringing in, he was just using your account?

Answer. He used my account.

Question. Okay.

Mr. BALLEN. If anyone.

The WITNESS. Pardon?

Mr. BALLEN. If anyone, if he was bringing in anyone.

Ms. COMSTOCK. Well, I think these messages indicate he was making reservations for seven, so presumably he was bringing someone with him on this, EOP 9451.

Mr. BALLEN. We are talking about the witness' knowledge.

EXAMINATION BY MS. COMSTOCK:

Question. Was it your understanding Mark Middleton was coming in alone to have lunch at the Mess?

Answer. He could have. I never thought about it at all, one way or the other.

Question. I think you previously testified he was bringing somebody with him, or did you——

Mr. BALLEN. Objection.

The WITNESS. I hope my previous testimony was that if he brought his mother or whatever, he could bring whoever. I mean, I didn't think about it.

EXAMINATION BY MS. COMSTOCK:

Question. You didn't know who he was bringing?

Answer. Right.

Ms. COMSTOCK. I will make that Deposition Exhibit No. 12.

[Williams Deposition Exhibit No. MW–12 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Did you ever refuse the Mess privileges to Mark Middleton or say, no, my tab is up too high or I haven't been collecting on this?

Answer. No, that wouldn't be my nature.

Question. Are you aware of other people who he called at the White House to use their Mess privileges?

Answer. No.

Question. I believe Miss Ryan has indicated she really wasn't involved in the collection process on the bills. Do you know anybody else in your office who may have been trying to collect the bills?

Answer. Probably nobody. If she wasn't, nobody was.

Question. If Evan wasn't, you don't know of anybody else who may have been trying to follow up on these, after people to use the account?

Answer. No. That would have been great. No, if Evan wasn't, then it wasn't happening.

Question. I would like to show you Mark Middleton WAVE records, generally, not just in the Mess things, and see if you know some of the people he was meeting with or if you recall any of the occasions of the meeting. These are EOP 20376.

Answer. Okay. Let me see.

Question. 20376, again, these are a little out of order. There are other people in here so these aren't necessarily sequential, so as we go through them, I will note the numbers so the record is reflecting what page we are looking at.

On the first page, 20376, there is a four—generally, before we go into these item by item, do you recall generally having meetings with Mr. Middleton after he left the White House in the spring, summertime of 1995?

Answer. No, I might—he might have dropped by to see me. I am trying to think. He might have dropped by to see me. I remember scheduling a meeting with him. When did he leave the White House?

Question. Approximately mid-February, '95.

Answer. No, I would see him around. It seems to me I saw him around.

Question. Okay. Then maybe this will be fairly quick to go through if you don't recall the meeting.

There is a 4–21–95, bottom line on the first page there from Mark Middleton. It shows the requestor was Ryan and the visitee was Ryan?

Answer. I'm sorry, go ahead.

Question. Are you familiar with these documents or how to read them?

Answer. I am just trying to read the 1310. Is that like 1:10?

Question. Yes, military time.

Answer. So it is probably lunch time. Okay. All right.

Question. Then there's another one on the next page which the number is a little cut off, but I think it is 20377. There is—the fifth item down is a 5/9/95——

Answer. Uh-huh.

Question [continuing]. Mark Middleton WAVE where the request is Ryan and the visitee is Williams and 5/19 also. I was wondering in this April or May time frame if you recall any topics that may have been coming up that you may have been meeting with Mr. Middleton on?

Answer. Topics?

Question. On what he may have been visiting your office for?

Answer. No, all I can think is lunch or to stick his head in to see me. I really don't. I'm trying to think.

Question. Do you know if——

Answer. 1 o'clock?

Question. Here is a highlighter, if that helps you. I notice that you are underlining, and if that helps you.

Answer. I'm just trying to——

Mr. DENNIS. What's the date on that?

The WITNESS. I think it's——

Mr. DENNIS. I can't figure out from the WAVE what the dates are.

The WITNESS. The dates wouldn't mean anything to me.

Ms. COMSTOCK. We can go off the record for a minute, and I can show both of you how it sort of works.

[Discussion held off the record.]

Ms. COMSTOCK. We can go back on the record.

The witness has been reviewing the WAVE records, and we have generally been discussing how to read them so that the witness understands what she is referring to.

Mr. BALLEN. And what is the pending question?

The WITNESS. I thought, did any of these strike me as significant or did I recall?

EXAMINATION BY MS. COMSTOCK:

Question. Did this refresh your recollection as to meetings with—any meetings or times you met with Mr. Middleton or any of his associates?

Answer. Well, the dates always mean nothing to me. I can't—dates——

Question. I understand specific dates, but if—the general time frame?

Answer. I guess a lot of these look like lunches, except for a couple here which I don't—it doesn't refresh my recollection, and I really don't know what——

Question. There's a seating at the mess for 1:15? At 12:00 and at 1:15?

Answer. Yeah, I think it's 1:15 or 1:30.

Question. Specific times?

Answer. They're specific times, kind of. They're specific times, but the mess closes—I think it closes at 3:00, so, you know, you can be under the wire a little bit.

These—I mean, they don't—you know, I saw Mark around. I don't remember, you know, what I talked to him about, other than how're you doing?

Question. Do you recall if Ms. Ryan was ever meeting with Mr. Middleton for any purpose that you know of?

Answer. I mean, I would think there would be no purpose.

Question. Okay. And I wanted to direct your attention to 5/19/95, one on the second page here?

Answer. 5—I'm sorry?

Question. On the second page. The one that's hard to read the Bates stamp number. There's a 5/19. It says Ryan requesting and Williams is the visitee and says second floor, West Wing.

Answer. Would you just mark it?

Question. I'm sorry. I'm forgetting. Is the mess technically on the second floor? Is that the first——

Mr. DENNIS. Basement.

The WITNESS. It's really in the basement. But when WAVEs show—depending on where you make, sometimes, the reservation for, they'll say, you know,—they'll give me office number as the——

EXAMINATION BY MS. COMSTOCK:

Question. Place?

Answer [continuing]. Number that you're coming to. They won't necessarily say mess. They'll give like an office number.

So like here, Mack McLarty. They're a little bit more exact here. They say ground floor. Mack's office is the ground floor, West Wing. The same above. They have West Wing. I mean, kind of depending on who, like I said, is doing the WAVEs thing on the end. I had an office second floor, West Wing, and an office 100 OEOB. So that could be—you know, they have to come up with a destination and they use your office generally.

Let me see if that's consistent throughout.

Mr. DENNIS. You have 100 here.

The WITNESS. Right. They go back and together.

EXAMINATION BY MS. COMSTOCK:

Question. In reference to the 5/19/95 meeting—I apologize in advance. It's a document numbered EOP 56855, but this is another WAVE record we've got from the White House. It's for Mr. Ng Lap Seng.

Answer. Where is that?

Question. I'll highlight it for you. You can see it if it's highlighted.

Answer. Okay.

Question. Lap Seng is on the left-hand side there.

Answer. Okay. Okay.

Question. 5/19. And——

Mr. BALLEN. We would stipulate that that's what it is, if you want to write it out.

Mr. DENNIS. Yeah. You can see it L-A-P, S-E-N-G.

The WITNESS. I can see——

Ms. COMSTOCK. You can see the "N-G" a little to the right, and then it's "Williams."

Mr. DENNIS. But then it is Khapra on the line there.

Ms. COMSTOCK. There is also—because these were WAVEs—a number of his WAVEs—that's a separate time for Khapra.

Mr. DENNIS. Below that it looks like a Larson—oh, maybe that is Lap. Yeah, it is both of them.

The WITNESS. And these are the same dates for the one above and below?

Ms. COMSTOCK. Yes.

The WITNESS. So he went—is that noon?

Mr. DENNIS. 13:15.

EXAMINATION BY MS. COMSTOCK:

Question. Yes, noon.

Do you know Yusef Khapra at the White House? Do you recall who he was?

Answer. I think he worked for Mack at some point. I'm not sure—or Mark at some point.

Question. And—but this is—the 5/19, your name is the same time as visit time at 1:15 as Mark Middleton; and I was wondering—and this is—Ng Lap Seng is also known as Mr. Wu, the partner of Charlie Trie. Do you recall ever meeting a Mr. Wu or a Mr. Ng Lap Seng?

Answer. No.

Question. Do you have any knowledge of Mr. Middleton bringing this individual to your office?

Answer. No.

Question. Or to the White House?

Answer. No, huh-uh. Not at all.

Question. So on this date, whatever, this May 19th, '95, when Mr. Middleton came to the White House the same time as Mr. Ng Lap Seng both under your name, you have no knowledge of what he was doing there or if he was with Mr. Middleton?

Answer. Right, or not with him. I don't know him. And you say his name is Lap Seng?

Question. Yes.

Answer. But he's known as——

Question. Mr. Wu.

Answer. I don't—I don't know.

Question. What is it? It was two different names they usually have.

Mr. BALLEN. You don't know either one of them?

The WITNESS. Either one of them.

Ms. COMSTOCK. I just wanted to give you all the aliases just in case.

The WITNESS. No, I don't know him.

EXAMINATION BY MS. COMSTOCK:

Question. Did you have any knowledge of the any of the Asian clients that Mr. Middleton had?

Answer. No. I didn't know what clients he had.

Ms. COMSTOCK. I will go ahead and make this, the Ng Lap Seng WAVE record, EOP 56855, make that Deposition Exhibit 13.

[Williams Deposition Exhibit No. MW–13 was marked for identification.]

Ms. COMSTOCK. I'll make this other group of WAVEs for Mark Middleton Deposition Exhibit 14.

[Williams Deposition Exhibit No. MW–14 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Maybe we could just briefly go through a few of the other ones in there.

Answer. Okay.

Question. The third page has meetings on June 5th, June 20th—or entrances to the White House—why don't I characterize them as entrances to the White House on June 5th, June 20th and June 29th, where the requester is Ryan and the visitee is Williams. In the summertime of '95, again any recollection?

Answer. I mean, I just don't know. I've got no recollection of what——

Question. One of them is at 2:30 in the afternoon. One is at 11:00 in the morning. One is at 5:00. Does that assist at all?

Answer. For the same day?

Mr. BALLEN. Excuse me. I believe the witness has already testified she's going through all of these documents, and it doesn't refresh her recollection. Going through them individually, I don't know whether that will refresh—she has always testified. This has been asked and answered. She doesn't recall any specific meetings.

EXAMINATION BY MS. COMSTOCK:

Question. We are just going through and pointing out some of the time frames on that, if that helps. I think we will be fairly brief going through these. But that doesn't assist you in any way of recalling what he might have been doing there?

Answer. No.

Question. Do you know of Mr. Middleton ever meeting with Mr. McLarty on bringing any of his clients to talk to Mr. McLarty?

Answer. I don't know that.

Question. I believe these go through—the most recent ones are—the last page has a 9—the second entry is a 9/25/96, so last September, '96—September 25th, 1996.

Mr. DENNIS. The last page.

EXAMINATION BY MS. COMSTOCK:

Question. The last page of the document EOP 20392, where he comes into——

Answer. Okay.

Question [continuing]. Room 100. The requester is Ryan, and then the visitee is Ryan. And just to put this in context, this is a time when there had been—I think there had been a couple of stories, maybe only just one, on some Asian fund-raising problems. I think the Chung Am company out in California. That story had been in the L.A. Times.

Did Mr. Middleton during the fall of '96, September-October '96 time frame, ever contact with you at any time or talk with you any time about any of the Asian fund-raising issues?

Answer. No, absolutely not. Huh-uh.

Mr. DENNIS. Same day? That's the next day, the 27th. Still—2:30 in the afternoon.

The WITNESS. And this is what?

Mr. DENNIS. 10 o'clock in the morning.

The WITNESS. Right. Uh-huh. I don't know.

EXAMINATION BY MS. COMSTOCK:

Question. Maybe we could—some of the names here, I think—do you know who Button is? Who that is? Whose office that person is?

Answer. Katy Button. I don't know if it is "I-E" or "Y." She works for Melanne Verveer, but I can't—I don't know if she was an intern then or not. I don't know.

Question. Okay. And I wanted to direct your attention back to 20378. There was a 6/29/95 entry where Ryan waved in Mark Middleton and the visitee was Williams.

And I wanted to show you a phone message log that was—it's EOP 59079 through 80 which was—the message was to Evan from Shawn in Mark Middleton's office; and the message reads, the meeting for tomorrow at 5 p.m. is great for Maggie, Lynn Cutler and Mark Middleton. And this message is 6/28/95, as I said, and is referencing a meeting tomorrow, which presumably would be 6/29 at 5 p.m., and the record on here does reflect an entry time of 1700, which would be 5 p.m. on the WAVE's records.

Mr. BALLEN. Counsel, what page, please?

Ms. COMSTOCK. This is page 20378.

EXAMINATION BY MS. COMSTOCK:

Question. And so I was wondering if that refreshes your recollection as to that particular meeting or if you ever had a meeting with Mark Middleton and Lynn Cutler?

Answer. I'm trying to think if this was the same day as—'95?

Mr. DENNIS. '95.

If we could just have a second.

Ms. COMSTOCK. We can go off the record for a moment.

[Recess.]

Ms. COMSTOCK. We can go back on the record.

EXAMINATION BY MS. COMSTOCK:

Question. When we broke we were talking about a June, '95—June 29, '95, entry on the WAVEs record; and then they referred to a June 28th, '95, phone message that was for a meeting for June 29th at 5 p.m., which is the time frame reflected on the record; and the meeting was to be with Maggie, Mark Middleton and Lynn Cutler. And the question pending was if you recall generally in this time frame or any time of meeting with Mark Middleton and Lynn Cutler?

Answer. What I recall—and, once again, I'm not sure of the time frame—is that there was a meeting for Lynn and Mark which I wanted to put together. I believe this was—and I'd have to check—this is—it was a meeting about the women's delegation to Beijing.

We had had, 2 days earlier—I think 2 or 3 days earlier—once again, I don't know about these dates—a meeting to explain to people who might support the women's delegation in Beijing, you know, everything about it—anybody who was in business or had an interest in it, foundations and everything.

And I had wanted Mark to be a part of it because I knew that he was involved in international business. And I don't think that he could come, but I remember—and like I don't know if this is the date, but I remember getting Mark and Lynn Cutler together. Lynn had been one of the presenters at that meeting, and I wanted her to talk to him about the delegation.

Question. Okay, and was Ms. Cutler going to be involved in the delegation going to Beijing?

Answer. Oh, she—not involved in going. She actually was involved in a whole series of events around the delegation that happened in the United States about U.S. support for the delegation, which is why she was one of the big presenters at a meeting that had been held at the White House a few days earlier. But, like I said, that—seeing Lynn's name refreshes my memory about wanting to put her together with Mark Middleton, but I'm not sure if this is the date or the time, but I know at some point that I did that.

Question. Okay, I am not recalling when the Beijing trip was.

Answer. I don't either, but I—they were selecting a delegation, and that I remember because we held a big meeting with foundations and all kinds of people who were interested in international businesses. And I remember Lynn was a presenter, and I wanted Mark to go to that meeting. I think that would have been good for him.

Ms. COMSTOCK. Okay. We'll make that Deposition Exhibit No. 15.

[Williams Deposition Exhibit No. MW–15 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. I think when we were talking about Mr. Greene earlier you had no recollection of Mr. Greene ever talking to you about Mr. Trie?

Answer. No.

Question. Do you have any knowledge of anybody trying to get Mr. Trie involved in the Beijing delegation or trip?

Answer. No, no.

Question. And this is—again, this is a WAVE record for May 19th, '95. We had previously been referring to the Middleton documents that had a May 19th meeting and then the Ng Lap Seng ones that had a May 19th visit to the White House.

And, again, this is a May 19th, '95, WAVE for it says, Yah Trie or Yah Lin Trie, I guess it is, on May 19th, '95. And it's requested by Ryan and the visitee is Williams. And it appears from the records that he came in with Mr. Middleton and Mr. Ng Lap Seng for that which you testified you weren't aware of.

But does that assist you a lot, all that grouping, being together, the three of them?

Answer. No, no.

Ms. COMSTOCK. I'll just make that Deposition Exhibit No. 16.

[Williams Deposition Exhibit No. MW–16 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. And you have no knowledge of Mr. Trie meeting with Mr. Middleton on any occasion——

Answer. No.

Question [continuing]. Or having any business——

Answer. Relationship at all.

Question [continuing]. Relationship? Okay.

Did there come a time last fall when the stories about Mr. Middleton possibly soliciting money from Taiwan, the $15 million that is alleged—that somebody in Taiwan alleged he was trying to raise for the DNC, did you ever talk with him about——

Answer. No.

Question [continuing]. That story or those allegations?

Answer. Oh, no.

Question. In any way?

Answer. No.

Question. Were you aware of him—did you ever learn of him, aside from press accounts of being in Taiwan with Mr. Trie?

Answer. No, I did not know that.

Question. Were you aware of the DNC raising money for health care media in 1994?

Mr. BALLEN. I'm going to object as to the relevancy of the question.

The WITNESS. I—I don't know what—can you give me some more context?

EXAMINATION BY MS. COMSTOCK:

Question. Well, if you're generally aware of efforts to raise money in 1994, specifically designated for health care purposes.

Answer. For health care? The DNC had a health care project itself.

Question. And do you have any knowledge of any particular people who were donating to the DNC for health care purposes?

Answer. No, not offhand, I couldn't—donating to the DNC for health care purposes.

Question. For the health care campaign?

Answer. For theirs? No, not offhand, I can't.

Ms. COMSTOCK. Okay. I'm showing the witness a document that's F 38902, which is received from the DNC and directing your attention to the first two entries there. It says, 5/12/94, two entries for $20,000 health care campaign, and it is a—donations from Charlie Trie is what is indicated on here.

The WITNESS. Where? Oh, up here.

Ms. COMSTOCK. The top of it says, DNC Finance Executive Summary. Then it says, Mr. Charlie Trie. And then it has written and then it says 5/12/94, amount $20,000 entry and a $60,000 entry. And both of them are identified as 1994 health care campaign, and the solicitor was Mr. Richard Mays.

The WITNESS. And these are—these are contributions to the DNC?

Ms. COMSTOCK. Yes.

The WITNESS. Oh, okay.

EXAMINATION BY MS. COMSTOCK:

Question. And these are—do you know who Mr. Richard Mays is?

Answer. Yes, uh-huh.

Question. And how do you know him?

Answer. He's from Arkansas. He's a long-time friend of the President and Mrs. Clinton.

Question. Did you have any knowledge of Mr. Mays raising money in particular targeted for the health care campaign and health care bill?

Answer. No, not particularly, no.

Question. And it's your testimony that you had no knowledge of any particular donors who were donating money——

Answer. Money to——

Question. Say large sums, anything over 5, 10,000, to the DNC for the purposes of health care?

Answer. For the purposes of their——

Question. Of the health care campaign?

Answer. Of their—the DNC's health care campaign?

Question. Yes.
Answer. Not that I can recall.
Mr. BALLEN. It has been asked and answered.
The WITNESS. No.
Ms. COMSTOCK. Make that Deposition Exhibit No. 17.
[Williams Deposition Exhibit No. MW–17 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. This is EOP 43683. It is a February 15th, 1995, memorandum for Harold Ickes from Terry McAuliffe and Laura Hartigan and Ari Swiller regarding managing trustees dinners. We had previously discussed just generally managing trustee dinners at the White House. And I would direct your attention to—it says, the President and First Lady's tables; and under the First Lady's table the sixth person identified is Charlie Trie.
Answer. Uh-huh.
Question. I was wondering if that refreshes your recollection as to if you had any knowledge of Mr. Trie being a trustee or being involved in any events at the White House?
Answer. No, I—I wouldn't know him if I saw him.
Question. Other people indicated at the President and First Lady's table here, at the President's table, Mark Jimenez is identified as being at the table. Did you ever have occasion to deal with any matters related to Mark Jimenez?
Answer. He went to—there was in Florida—he went to a fund-raiser that—I don't even know whose fund-raiser it was. Maybe it was a DNC fund-raiser, but I remember him.
Question. And you met him?
Answer. No, I wasn't there. I've never met him.
Question. Do you know—so how do you know of him?
Answer. Because he was at a fund-raiser for Mrs. Clinton in Florida, went on one. I don't know if it was a DNC fund-raiser or a candidate fund-raiser. I remember he had a huge family. And he had—a huge family—and he had some wives of people from somewhere with him, and there was a discussion about if he could bring all of them into the fund-raiser or something. But there was something—which is why his name rings a bell. There was something with the Florida fund-raiser and his guests.
Question. And this—and how did you learn of this?
Answer. Oh, I think probably through my scheduler.
Question. And what was the discussion——
Answer. I'm trying to remember. I don't know—I just know that his name rings a bell for me. Florida fund-raiser, maybe DNC. He had guests. I don't know if they were foreign guests. He also had a huge family, and there was some mix-up about who he could bring or couldn't bring, and I just remember it being drawn to my attention.
Question. And there was a mix-up with he wanted to bring foreign people and there was an issue of whether or not he could bring foreign people to the fund-raiser?
Answer. It seemed to have been foreign people to the fund-raiser or the number of people in his family who wanted to be at an event. But I just remember there was a big kind of bugaboo about it, which is why I always remember his name.
Question. And who was involved with this bugaboo?
Answer. I just remember my scheduler talking to me about it.
Question. Were DNC people involved in that process also?
Answer. Yes, and I don't know who, but yes. Somebody from the DNC also I think called me about it.
Question. Do you——
Answer. I mean, I don't remember the specifics of it. But, you know, seeing his name rings a bell.
Question. And, generally, do you recall who at the DNC—this is just generally aside from this matter—who you generally would be in touch with, who would call?
Answer. It varied so much, especially if you were in a State. It might be somebody related to a State party completely, you know, kind of not in the Washington DNC mix.
But I do remember this Florida thing and his name and it being brought to my attention as a problem. But I don't know how we worked it out, you know, but I know that it was—there was an issue. There was something about his name that rings a bell.
Question. Do you recall if Mack McLarty ever talked to you about Mr. Jimenez?

Answer. No, I don't remember Mack ever talking to me about him. Huh-uh.

Question. Generally, what was the practice on these fund-raisers on who could come? You said there was sort of a bugaboo about this one. What kind of issues would arise in terms of who could be at fund-raisers with the First Lady? Were there other instances where issues arose about someone shouldn't be from or——

Answer. No, mostly, I just—I remember this. The only issues for us would tend to be crowds and how many events and how long that she had to work them. And, for us, the issues almost inevitably were the number of people and whether or not the number of people at a fund-raiser would require that she shake hands with every person, which was usually a requirement. So that was something that we always talked about—size, number, how many, how long. These were our major issues.

But there was something on this particular front, talking about—I'm not sure about—I just remember it happened as an issue, and it had to do with Florida, and it had to do with size and how much time she had to be somewhere, but I don't know—remember the particulars, but that's what I remember.

Question. And when there were fund-raising events—and I'm talking now about—you know, we've talked a lot about events that were held at the White House, so I'm talking now about events that were fund-raisers that you would go out——

Answer. Uh-huh.

Question [continuing]. To Florida——

Answer. Out some place.

Question [continuing]. Some place where official DNC fund-raising type of things—was the First Lady usually memoed by somebody? Like saying if it was going to be a small event or who the—these are the people who paid 10,000 each for this DNC event? Was there ever any memos or documents informing her about who was going to be there and who the people who should be recognized are?

Answer. If there were, it would be a part of her schedule. It would come to the schedule, and it would be a part of the schedule.

Question. Did that go through you at all?

Answer. Oh, I would generally see the schedule the night before. I'd take a look at the schedule. But, you know, we—we had pretty competent help in the scheduling.

Question. And that's scheduling that you saw on a daily basis the night before. Did that usually include briefings about people who would be at events?

Answer. Yes, sometimes it did. If it got—if they came to us. I mean, you know, if it got to us on time.

Question. And then returning to EOP 43683, the February 15th, '95, memo for Harold Ickes—at the President's table is also seated Pauline Kanchanalak. Do you recall ever seeing or knowing of Ms. Kanchanalak being at the White House?

Answer. I think only from press accounts.

Ms. COMSTOCK. I'll make this Deposition Exhibit No. 18.

[Williams Deposition Exhibit No. MW–18 was marked for identification.]

Ms. COMSTOCK. This is EOP 63612. It is a memo to Alexis Herman, Maggie Williams and Mack McLarty from Lynn Cutler, re: Request of Mark Jimenez, September 25, 1996.

I'll just let you take a look at that.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall getting this memo?

Answer. No.

Question. If you recognize the handwriting on that, could you identify any that you recognize?

Answer. No.

Question. I believe the note on one of them does look to be signed by Mr. McLarty, the right-hand side, the script.

Answer. No, I really—I don't recognize the handwriting.

Question. Do you know any connection—do you recall discussing with Lynn Cutler anything having to do with Mark Jimenez?

Answer. Not that I can recall.

Question. Do you know if she was involved in any of these discussions that you relayed about the Florida trip or anything about that?

Answer. No, huh-uh. I don't remember her being—I remember talking to someone in Florida about it.

Question. And do you recall who the Florida person was?

Answer. No, I don't think I knew the person. I don't know if it was a State party person or someone just involved locally. I'm not really clear who I was talking to.

Question. And Alexis Herman, could you just, for the record, just give us her position and what she did at the White House?

Answer. She was the director of public liaison for the White House, the public liaison office.

Question. All right. And the memo we were discussing earlier today, May 5th, 1994, you know, had identified her as the contact person on official delegations abroad?

Answer. Uh-huh.

Question. On the May 5th, 1994, memo, item number 4 had been invitations to participate in official delegations' trips abroad. Again, this was in connection with an order to reach our very aggressive goal of $40 million.

Do you know—and I think from the previous docket we were reviewing Mark Jimenez was at a trustee dinner. Do you know, was there ever any effort to assist these trustees on these official delegation trips?

Answer. I mean, I don't know. I didn't—I would be asked from time to time if I had any suggestions for the delegation. I don't know if there was any special outreach work done for the trustees.

Question. Do you know why this memo was directed from Lynn Cutler to you? Why you were included in this circulation?

Answer. No, I just think Lynn wanted me to be aware.

Mr. BALLEN. Don't speculate. If you know, answer. Counsel's admonition to you at the very beginning was that we didn't want speculation.

The WITNESS. Well, it would be speculation. I don't know.

EXAMINATION BY MS. COMSTOCK:

Question. Previously we had—the meeting that you had with Lynn Cutler and Mark Middleton had been about the Beijing trip?

Answer. Uh-huh.

Question. This one she's referring to the APEC conference in the Philippines. Do you know any particular reason why Ms. Cutler is sort of involved or if she is involved in Asian affairs or has Asian interests and is involved in any matters related to this?

Answer. No, not that I know. She was involved in the Beijing conference, I believe, because of her relationship and work in the women's community. But I don't know about the APEC——

Question. Was she involved in fund-raising in '96?

Answer. I don't know—I don't know for sure.

Question. Do you know of—how often would you meet with Lynn Cutler?

Answer. Well, we worked on a women's committee together on women's issues and women's votes, which had—which was once a week or once every 2 weeks.

Question. And were there other matters you worked with Ms. Cutler on?

Answer. That was the primary one where I saw her. I mean, I've known Lynn Cutler for, I don't know, 15, 20 years. I mean, I've known her in Democratic politics for a very long time.

Question. Would those meetings be at the White House?

Answer. On women's issues? Yes.

Question. And were those meetings that you orchestrated or centered in your office or did someone else—was someone else in charge of them?

Answer. The White House had a women's office. So Betsy Myers—it would really involve most of the women in the White House—women from Cabinet affairs, from public liaison—representing each of the divisions.

Question. Okay. In this memo Lynn Cutler writes that Mark Jimenez of Florida, who has been very helpful to us on a variety of fronts, has called asking if he could be on the delegation to the APEC conference in the Philippines taking place April 22nd to the 25th. Do you know what she was referring to and how Mark Jimenez had been helpful on a variety of fronts?

Answer. No, I don't know with respect to this memo what she was—no.

Question. Or if you have any general knowledge of Mark Jimenez, the variety of fronts that he may have been helpful to anybody at the White House or at the party?

Answer. Well, I mean, just based on the document, it's——

Mr. BALLEN. No, she's asking for your knowledge.

The WITNESS. From my knowledge, no.

EXAMINATION BY MS. COMSTOCK:

Question. And then it goes on to say, you will remember that Mark is from the Philippines and I know that this means a great deal to him. Do you know if Lynn

Cutler had any reason to believe that you had any particular knowledge about Mark Jimenez when she is directing this memo to you?

Answer. No.

Question. Do you know if you did any follow-up to this memo?

Answer. No.

Question. Or can you recall any discussions with Alexis Herman or Mack McLarty about Mr. Jimenez?

Answer. No, because I don't even remember this memo.

Question. Okay.

Ms. COMSTOCK. I will make that Deposition Exhibit No. 19.

[Williams Deposition Exhibit No. MW–19 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. I wanted to return to talking about Charlie Trie a little bit. Was it your testimony that you were not aware of him being at the White House at any time?

Answer. No.

Question. Did there come a time when you learned about his donations to the President's legal defense fund?

Answer. Yes.

Question. And could you describe——

Answer. His?

Question [continuing]. When you learned of that and what you learned? From whom, et cetera?

Answer. I learned from Michael Cardozo, who was one of the trustees of the President's legal defense fund.

Question. And how did you learn about it from Mr. Cardozo?

Answer. He asked for a meeting. I was included in that meeting where he—excuse me, I'm sorry—told us about donations that had been given to the President's legal defense fund by a religious sect of people and that the President's legal defense fund trustees were concerned about the donations and had decided to return them.

Question. And did he describe what those concerns were?

Answer. Oh, gosh. The gist of it, I believe, was that members of the sect had written checks—no, wait. It had something to do with serial numbers. The serial numbers on the checks were consecutive or something, and there was a question about whether or not the donations that these people were making were their donations. I think that's the gist of it.

Question. Okay. And do you recall if this was—you were informed of this by phone or in a meeting?

Answer. No, it was a meeting.

Question. And do you recall who else was at the meeting?

Answer. Michael Cardozo and some lawyers who I do not know, Harold Ickes, Evelyn Lieberman, Cheryl Mills. That's what I recall.

Question. Is that the May 9th, '96 meeting? Do you recall generally when the meeting was in the spring of '96? Do you know—maybe it would help. Do you know if you had a number of meetings with Mr. Cardozo on this or did you only have one?

Answer. I remember being invited to two, going to one, which was the first one, and getting to, I guess, to the second one at the end of the meeting, that they had broken up.

Question. And do you recall if this was the first meeting?

Answer. I believe this was the first meeting that I just talked about.

Question. Generally, that's been identified as a meeting—I believe we have a number of calendars; I don't think we have your calendar—but it was a May 9th meeting that Mr. Cardozo has testified to and Mr. Ickes notes and others from that day that identify you as being there.

Do you recall prior to this May 9th meeting if anyone—if Harold actually had told you about anything related to Charlie Trie or these contributions?

Answer. No, that was the first I ever heard about it from Mr. Cardozo.

Question. So the First Lady hadn't mentioned anything to you about this before?

Answer. No.

Question. Do you recall in that meeting if anyone breached the fact that Charlie Trie was a—had been raising money for the DNC?

Answer. No, I know that his name was raised in connection, but I don't know if this was Charlie Trie, DNC member. I just remember his name.

Question. Did anyone in this meeting—when you went to this meeting, you didn't know who Charlie Trie was from Adam, right?

Answer. No, the only thing I knew about Charlie Trie was that he was from Arkansas.

Question. And when you had this meeting set up, did somebody tell you, like why am I going to this meeting with Mr. Cardozo or tell you that it was related to Charlie Trie?

Answer. No, I mean, I don't know who got the—you know, how the message came in or how, you know, Evan got word to schedule me. But just that there was a meeting, and Mr. Cardozo wanted me to be there. So I went.

Question. Had you ever been involved in any discussions about the President's legal defense fund prior to this date?

Answer. I think the first time that it was announced I, you know, for sure had the press materials. And then I believe—and I don't know if this is before or after May 9th, but the first time that they released information about—about what the amounts that were raised. But they were going to do a press conference. They called, you know, me in and the press people to say we are releasing this tomorrow, so you should know about it. Other than that, those are the only two times.

Question. Did you ever discuss the Clinton's personal legal bills with Mr. or Mrs. Clinton?

Answer. Their personal legal bill, no.

Question. The legal bills that this defense fund was paying for?

Answer. No, it was pretty much the trustees. I mean, that was nothing——

Question. You had said that Mr. Cardozo wanted you to be at the meeting? Was that your understanding?

Answer. Yes.

Question. Do you know how Mr.—why Mr. Cardozo was inviting you?

Mr. BALLEN. If you know.

EXAMINATION BY MS. COMSTOCK:

Question. If you know.

Answer. No, but—well, I assume that he wanted to have someone there from Mrs. Clinton's office, since this also was the President and Mrs. Clinton's legal defense fund.

Question. I just trying to get a sense of why—I mean, it was your understanding that this legal defense fund was to pay for their personal legal bills?

Answer. Right.

Question. And if you have an understanding of why you were involved in discussing a fund that related to the President and Mrs. Clinton's personal legal bills.

Answer. I think that because, even though we can easily make the distinction between personal and public, it's rarely made with respect to the press, and I think that Mr. Cardozo felt that telling us what they were planning to do—I mean, it wasn't a deliberative meeting, but telling us what they planned to do was something we needed to know in case we had inquiries about it at some point.

Okay. I believe Mr. Cardozo's indicated that he called you to set up the meeting. Do you recall him calling your office to set up the meeting?

Answer. No, no, he didn't call my office to set up the meeting. He may have called my office to ask to use a conference room in room 100, which is where my office is, but he didn't call me to set up the meeting.

Question. And do you recall where the meeting occurred?

Answer. Room 100 conference room.

Question. That's where the meeting was held?

Answer. Uh-huh.

Question. And so you don't recall talking to him on the phone about setting up this meeting? Somebody else set it up?

Answer. Setting up this meeting?

Question. Yeah.

Answer. No.

Question. Do you know how the other people at the meeting had been invited to the meeting?

Answer. No.

Question. You have no knowledge of who invited them or how they ended up in your office about the meeting?

Answer. No.

EXAMINATION BY MS. COMSTOCK:

Question. And I'm sorry, maybe this is my fault for not being clear on this, but you don't have a recollection of Mr. Cardozo calling to set up the meeting?

Answer. No.

Question. Do you know how you ended up having the meeting and who set it up, who was in charge of setting it up?

Answer. I assume, since Mr. Cardozo was an outsider, that perhaps he called my office and left a message or something and said, would you attend a meeting, and then probably spoke to someone about where to have it, which wouldn't——

Mr. BALLEN. But you don't know?

The WITNESS. It wouldn't necessarily have been me. I don't know.

Mr. BALLEN. You are assuming this?

EXAMINATION BY MS. COMSTOCK:

Question. I am just trying to figure out the origin of the meeting?

Answer. I don't know.

Question. Because I think Mr. Cardozo indicated he called you, so I am trying to figure it out if you have a recollection of how it came about.

Mr. DENNIS. Are you asserting that Mr. Cardozo has testified or stated that he called Ms. Williams to have her arrange for the meeting; is that what you are saying?

Ms. COMSTOCK. That is my understanding.

Mr. BALLEN. For the record, if you are going to ask her, where did he assert this?

Ms. COMSTOCK. I believe it is in the records we have.

EXAMINATION BY MS. COMSTOCK:

Question. But if that is your recollection. That may not be the case. Obviously, whatever your recollection is, we can check on his recollection. If I am inaccurate what his recollection of it is, I apologize. I am trying to figure out sort of how it came about that you all were in this meeting on May 9, and who sort of was the generator of getting this group together that was there, and who might have selected the people that were there, and it is your testimony that you don't know why Harold Ickes was there?

Answer. Right, I don't know. I didn't put the meeting down.

Question. So the people who were there got there by somebody else calling them other than you?

Answer. Right, it wasn't me.

Question. Now, in this May 9 meeting, did anyone indicate there had been an earlier meeting several weeks before with the First Lady and Harold Ickes about Mr. Trie?

Answer. No, no.

Question. And in this May 9th meeting, did Mr. Cardozo talk about the investigative group's investigation of Mr.—well, the donations in general?

Answer. I don't know if they were at that point if they had investigated or they were going to, but he mentioned that there would be some kind of investigation.

Question. And what did you learn more about; did there come a time when you learned more about this investigation and what it included?

Answer. I think I did, but I don't know when. I don't remember what I learned from the investigation. As I said before, I don't know if it had—if, when he talked to us, he brought us a conclusion on whatever that meeting was, or if he was just starting an investigation. I don't remember, but I remember that he said something about an investigation.

Question. Okay. Did you take any notes in this meeting?

Answer. No.

Question. Do you know if anyone else at the meeting was taking notes?

Answer. I wasn't paying any attention.

Question. You did not direct anyone from your staff to take notes in this meeting or keep any account of it?

Answer. No.

Question. Did you talk with Mrs. Clinton about this matter after the meeting?

Answer. No.

Question. You said you thought that Mr. Cardozo was talking to you about this, that someone in the First Lady's Office would know about this. What was your understanding then of—after you got the information, was there any reason not to tell Mrs. Clinton about it or talk about it?

Answer. It's like most things, nothing had happened yet. The trustees had made a decision. Most times these things are told to us because there is a possibility of press inquiries. This wasn't a decision-making meeting, so I said—you know, just had it in my head.

Question. Okay. Did anyone in the meeting bring up the fact that Charlie Trie claimed to be a friend of the President?

Answer. I know that Charlie Trie was involved in some way with the donations. I don't remember exactly how, but I know his name was a part of a—whatever narrative it was that Mr. Cardozo was sharing with us. I don't remember anyone specifically saying Charlie Trie is a friend of the President.

Question. Okay. But do you recall any discussion of who is Charlie Trie, this guy who—was there some curiosity about who is this guy who came in and dropped 600 grand on the legal defense fund, like do we know him, where did he come from?

Mr. BALLEN. I am going to object. There has been no indication that 600,000—that Charlie Trie dropped it on anyone. You are assuming facts not in evidence.

EXAMINATION BY MS. COMSTOCK:

Question. Did Mr. Cardozo tell you Mr. Trie had brought in money to the legal defense fund?

Answer. As I said before, in the—I guess the narrative of Mr. Cardozo, Charlie Trie was mentioned. How he was mentioned specifically—but it was next to these donations, that is what I remember. As I said before, the gist of my memory is that there was something wrong with the way these were collected, and the trustees had decided to give them back,. That is what I remember from that.

Question. Did Mr. Cardozo tell you he had—that Mr. Trie had actually come in himself personally to deliver all these contributions?

Answer. I don't remember that.

Question. Okay. Mr. Cardozo has publicly testified to that, that Charlie Trie did come in and bring all the donations down. Does that refresh your recollection as to whether or not he shared that with you at that time?

Answer. As I said, I don't remember. What I took away from the meeting was they were giving money back.

Question. Okay.

Answer. And that there was a procedure to be responsible for collecting the money. That is what I remember.

Question. Do you recall any discussion of who is this guy, who brought the money in?

Answer. No, that is pretty much what I remember.

Question. There was no curiosity about who he was?

Answer. Well, I guess what I am saying is there very well could have been, but I don't remember.

Question. Do you recall if you had any curiosity about who this person was?

Answer. Pretty much what I recall, I have told you.

Question. Okay. These are notes that Harold Ickes made from the May 9th meeting. They are difficult to read. It is CGRO–2595 through 2598, and it is a little bit cut off at the top. I am not sure how cut off yours is, but these are May 9, 1996, notes. The initial entry discusses the investigative group. It says, "Need to check background." Then the next line says, Charlie Trie, dollars, and mentions 463,000; 179,000.

Does that refresh your recollection as to whether Mr. Cardozo, in this meeting, had discussed, you know, that Charlie Trie was specifically the person giving these large donations, and that they might need to check his background?

Mr. DENNIS. Before you answer, is there a date?

Ms. COMSTOCK. It is 5–9–96 is the date on these, on the copy we have, the copies you have have cut that off.

EXAMINATION BY MS. COMSTOCK:

Question. And I guess the question pending question was does this refresh your recollection as to the discussion that Mr. Cardozo may have related that he had with Charlie Trie and the money that he brought in?

Answer. As I said before, I know Charlie Trie was involved. These are Harold's notes—that I just don't recollect all this discussion.

Mr. BALLEN. So the record is clear, you are not sure of the date of the meeting?

The WITNESS. Well, right, that is what I said at the very beginning.

EXAMINATION BY MS. COMSTOCK:

Question. You said you thought you had two meetings——

Answer. Well, I attended one meeting, and a second meeting I know I was invited to, but I got there after the meeting broke up.

Question. Do you know if that meeting was—what that was about, the second meeting?

Answer. No.

Question. So the only meeting you recollect is the meeting where Mr. Cardozo related that there was a problem?

Answer. Right, yes, exactly.

Question. Okay. I am not aware of any other meetings where Mr. Cardozo initially relayed this, besides the May 9 one and the meeting with Harold Ickes and the First Lady. Do you know of any other meetings besides the meeting that—well, you may not even know about the meeting with—I assume maybe from press accounts you know about the meeting Mr. Cardozo had with the First Lady and Harold Ickes; is that correct?

Answer. Right, I do know that.

Mr. BALLEN. There were several questions before you. Do you know from press accounts or independent knowledge?

The WITNESS. Well, the First Lady had a meeting with Michael Cardozo that Michael Cardozo asked me to set up, said he wanted to meet with Mrs. Clinton. I told the scheduler to put them together, so I do not know if this was the same meeting that Harold Ickes attended, because no one told me that Harold Ickes was attending, nor did I set up a meeting where Harold attended. I do know Mrs. Clinton and Cardozo had a meeting because Mr. Cardozo asked me to put him on the First Lady's schedule.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall generally, in relation to this first meeting where you learned of these matters, when the meeting with the First Lady is?

Answer. I could not tell you.

Question. I mean, was it a year before?

Answer. Oh, gosh, I just really don't—on the timing issue, I am literally of no help. They are all together, all these things. I don't know.

Question. Are there any other meetings Mr. Cardozo asked you to set up with the First Lady?

Answer. That is the only one I recall.

Question. There was one occasion Mr. Cardozo asked you to set up a meeting the First Lady?

Answer. That I recall, yes.

Question. Did he tell you what that was about?

Answer. No.

Question. You generally knew it was about the legal defense fund?

Answer. I didn't know that for a fact, but I assumed that is what it would be.

Question. And you set that up; you put that on the First Lady's schedule and had it set up?

Answer. Right.

Question. Do you recall where that meeting was?

Answer. No, I don't really remember.

Question. Okay. And then you do recall it being before this meeting where you learned of it?

Answer. I don't.

Question. You don't. Okay.

But your testimony is that you have only been involved in two meetings, and the second meeting was at the end of it, and you aren't really sure what the second meeting was about?

Answer. Not even the end of it. People had dispersed.

Question. So the only meeting you had been at——

Answer. There was a meeting I was at where Mr. Cardozo related the issue and what they had planned to do.

Question. This is a meeting with Mr. Ickes present and others, and I understand you may not be aware of the date. I mean, the date has been publicly identified by the White House by numerous records. I don't want to go on—I mean, I think we are talking about the May 9 meeting. You know, we could get a lot of records in here, but I think what we are talking about is fairly clear that it was a May 9 meeting.

But do you have any reason to believe there were other meetings with this group of people you are talking about where Mr. Cardozo relayed this—I guess there couldn't be another one because Mr. Cardozo told you—this is the only one you recall?

Answer. That is the only one I recall.

Question. Your account is he says he had one meeting with the same group, too, so it doesn't appear there can be another one?

Mr. DENNIS. Let me make a statement on this. If you have information that you can put together that, along with what my client recollects, you can establish it was May the 9th, I have no problem with it. My client is not saying it is not May the 9th, she just has no recollection. She provided a substantial amount of detail. She said it was number 100, and that was her conference room there, and she recalls who was there. So she does not have any recollection of any dates, and she can't really confirm that for you.

But there is just so much—you are not going to be able to get or to ask her to draw inferences from other information that you are giving her. That would not be fair for her to confirm that, you know, she believes it is May the 9th now because you told her certain things, but I think she is fairly——

Ms. COMSTOCK. I understand you can't recall the date. We could have everybody's calendar here and look at those, and it probably still wouldn't help.

Mr. BALLEN. And I think the witness, we have been going on this for quite some time, she stated a number of times what she recalls from the meeting, and I don't see——

Ms. COMSTOCK. But I think Minority counsel raised an issue that this was not the meeting.

Mr. BALLEN. Excuse me, counsel, I raised no issue. I simply asked her a question could she remember it was May 9th or not, when you gave her somebody else's notes of a particular meeting and she said she didn't know what the date was, simple as that. You are asking the witness to testify about somebody else's notes.

Ms. COMSTOCK. I am asking her if these notes helped refresh her recollection.

Mr. BALLEN. She said they did not.

Ms. COMSTOCK. But we introduced the notes because they are the notes of the only known meeting that this same group of people had, and Ms. Williams testified this was the only meeting she was at. Mr. Cardozo has publicly testified this is the only meeting he had with this group of people informing him of these events. It didn't seem to be a real leap of logic this was the same meeting, but that is what we have been trying to go through is additional establishment that there weren't other meetings about this, and I think that is fairly clear, and I think the record will speak for itself, and other documents will, that this was the May 9 meeting. But I am not asking you to come up with a date. I think other records will reflect that.

I would like to go ahead and make that Deposition Exhibit No. 20.

[Williams Deposition Exhibit No. MW–20 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Directing your attention to the second page of Mr. Ickes notes again. I am sorry, if I could have you turn to CGRO–2596. There is—the bottom two lines talk about 1.5 million, and it is difficult to read there, and then some amount in the bank. I wonder if this refreshes your recollection as to whether there was a discussion of how much money was actually in the legal defense fund at that time?

Answer. How much money was——

Question. In the legal defense fund, or just the amounts of money that generally were in the legal defense fund, if there was a discussion in the meeting?

Answer. I don't know if there was a discussion in it. It seems to me in the narrative that Mr. Cardozo said how much was in the legal defense fund.

Question. Okay. When he was telling you about these events on that day, the meeting you recall?

Answer. Uh-huh.

Question. And was he telling you that, you know, without this money, there wasn't a lot there; or give you a sense of, you know, kind of we need this, it wouldn't be bad to have this funding?

Answer. I think his sense was—I mean, I think my interpretation of his presentation was very, very cut and dry, and, you know, he was announcing that they had decided to return the money, and just as a part of his report he indicated to us how much was there, and he—this matter seemed settled in his mind.

Question. And do you recall if there was any discussion about if the money was returned, if that would be reflected in reports, the reporting that the defense fund had to do?

Answer. No, I don't recall.

Question. Do you recall if there was any discussion among the participants in the meeting of not wanting to return the money, or, you know, that we really need to return the money?

Answer. I think the one thing I remember from the meeting specifically which did have an impact on me, but seemed to have no impact on anyone else in terms of

returning the money, is that Cheryl Mills was saying we ought to be very careful in making certain that we were clear, that we thought that there was something—and I am paraphrasing here—that we were clear that we weren't going to be in a position to make a comment about Asian people giving; that we ought to be certain that we took some care in making certain that the kind of judgment we made would be the same kind of judgment we would make no matter who these people were. And I just was struck by that and thought it was a good comment to make.

Question. And was there any discussion back and forth on that point?

Answer. Not really. I think she just made her point. As I said before, it seemed to me that Mr. Cardozo was very clear about what he was going to do.

Question. And I just wanted to correct something for the record, because you had testified that Mr. Cardozo called you to set up the April 4 meeting, and my notes indicated when I said that I thought Cardozo called you about the May 9 meeting, it was actually the April 4 meeting. So I wanted to make that clear so—my notes aren't clear. I believe Mr. Cardozo indicated he may have called Mr. Quinn about the May 9 meeting.

Does that refresh your recollection on the May 9 meeting, whether or not Mr. Quinn called you about it or set up anything with you on the May 9 meeting?

Answer. It only refreshes my recollection inasmuch as I think Mr. Quinn was there.

Question. And I apologize for the mix-up. I am looking at my notes. It was April 4. I was looking at it as if it were May 9th.

Do you recall Jack Quinn being in that May 9th meeting?

Answer. I recall him being in this meeting where Mr. Cardozo said there was a problem.

Question. I will keep the date off of it.

So the meeting you recall with Mr. Cardozo?

Answer. Yes, I remember him being there.

Question. Okay. And do you recall Evelyn Lieberman also being in that meeting?

Answer. Yes, I believe she was there.

Question. Do you know why she was there?

Answer. Whoever invited her. No, I don't.

Mr. DENNIS. What was her position at that time?

EXAMINATION BY MS. COMSTOCK:

Question. In May of '96, if it was May of '96?

Answer. Deputy chief of staff, I believe, at that point.

Question. Okay. Following this meeting, what was the next time you ever had any discussion with anybody about Charlie Trie money or the legal defense fund, these events that were relayed to you in the meeting with Mr. Cardozo?

Answer. As I said before, I don't necessarily remember any follow-up. Kind of where I left off on this meeting was with returning the money. The next time I heard anything about this specifically was I think there had been a media inquiry about it, either to Mr. Cardozo—I think it was Mr. Cardozo. That was the next time I heard about it.

Question. Was that when it was about to become public that the contributions—is that when you recall?

Answer. It could have been. I forget when it became public. I really don't recall.

Question. If it refreshes your recollection, it was in December of '96 when that became public?

Answer. That could have been about the time.

Question. So between the time you were in this meeting, whenever it was, with Mr. Cardozo, the next time you recall hearing anything about it was when there was some media calls about it.

Answer. Right, that is the next time I remember having any, you know, radar pointed in the direction of this issue.

Ms. COMSTOCK. Let me show the witness a document. It is identified as PTO 2326, from the Presidential Legal Expense Trust, dated August 12, 1996, to Cheryl Mills, from Mr. Cardozo, and it reads:

Dear Cheryl: You may want to circulate by hand the enclosed letter from David Lawrence to: Mrs. Clinton, Jack Quinn, Harold Ickes, Bruce Lindsey, Evelyn Lieberman, Maggie Williams. Thank you for your assistance, Sincerely, Michael Cardozo.

Attached is a letter from a Mr. David Lawrence, dated July 5, 1996, where he indicates that—essentially that, "Unfortunately, as you suspected, the funds were raised by the efforts of a concerned party who was unaware of some of the terms

mentioned in your letter," not being the terms of what type of standards for compliance.

Do you recognize this letter at all?

Answer. It was shown to me. I don't recognize it as coming to me.

Question. I'm sorry, I am unclear what you mean by that?

Answer. In the previous deposition, someone showed it to me.

Question. But that is the first time you had seen this letter was in a previous deposition?

Answer. Right.

Question. And you don't recall then receiving it in August of '96?

Answer. No.

Question. At or around—any time?

Answer. I mean, I made the comment there that I believe by then I was in Chicago. I mean, if this was convention month, I mean, I am not sure, but there is a lot that could have been sitting on my desk, so I had not seen it prior to that deposition, and if it actually came to me anywhere in this month, I mean, it is clear that I wouldn't have seen it for a while.

Question. Okay. But do you recall any time prior to your deposition——

Answer. No.

Question [continuing]. Being told about a David Lawrence, who, you know, wrote back and said, you're right, this money wasn't raised in the appropriate way, or anything to that effect?

Answer. No, I really don't. That was just it. It was just like a time when this would have taken a huge back seat to anything, given the convention and everything. That is the only thing I can figure. I just don't remember.

Question. Okay. You were working on the convention when you were out in Chicago in August?

Answer. I had been out to the convention several times, plus Mrs. Clinton had a major speech to give.

Question. That was at the end of August?

Answer. Oh, you know, in planning for the convention.

Question. This is entitled, "The Republican Convention," actually, at the August 12 time?

Answer. Well, still we were preparing.

Question. But you were physically out in Chicago?

Answer. Yes, back and forth. I mean, I wasn't living there, but physically. I guess I am saying all this to say, in essence, July and August were very busy times and especially high times in terms of the campaign and things that were going on, and so I do not remember seeing it, and I am merely trying to—probably more for me than for you—to try and think, you know, if I had seen it, what was I doing, so that I missed it.

Question. Do you recall any conversations then you had with Cheryl Mills about the legal expense trust after this meeting with Mr. Cardozo?

Answer. Quite frankly, I don't think I have thought about it again until there was a press inquiry about it.

Question. Do you have any knowledge of anyone informing—the first name on here to circuit this to is Mrs. Clinton; do you have any knowledge if Cheryl Mills or anyone else at the White House informed Mrs. Clinton about this?

Answer. I have no knowledge if they did.

Ms. COMSTOCK. I will make that Deposition Exhibit No. 21.

[Williams Deposition Exhibit No. MW–21 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Once the press inquiries came out about Mr. Trie, did you ever talk with the First Lady about Mr. Trie at all?

Answer. No, I don't recall that I did.

Question. Were you aware of him being at a trustee dinner in December of '96?

Answer. No. If I had seen the list, maybe, but I don't recall it.

Ms. COMSTOCK. I am handing the witness an e-mail. It is an e-mail, Evan Ryan, of May 9th, to Peggy Lewis.

EXAMINATION BY MS. COMSTOCK:

Question. Do you know who Peggy Lewis is?

Answer. Yes, she worked for me.

Question. What were her responsibilities?

Answer. She worked for me. She worked on policy issues for me. She would work on getting me to return my calls, worked on particularly issues that had to do with the White House preservation fund, just a range of different things.

Question. Okay. And the text of the e-mail reads, Maggie wanted to add John Huang to her call list. And we have some issues here on whether May 9 was the day of the meeting that you had with Mr. Cardozo, but assuming that it was, I am wondering, do you recall, as a result of that meeting, whether you reached out to John Huang to talk to him about Charlie Trie?

Answer. A result of which meeting?

Question. As a result of the meeting Mr. Cardozo, if you made any efforts to talk with John Huang about Charlie Trie, anything like that?

Answer. No, absolutely not.

Question. Do you know what you were putting John Huang on your call list for, in May of '96?

Answer. Well, the only thing I can think of since I only met John Huang once, and I don't know the date, is if he had called me and I wanted to return the call. I wouldn't have initiated a call with John Huang.

Question. Do you recall generally how you met Mr. Huang?

Answer. Yes, and I don't know the date, but I got a call from the Ambassador of Micronesia.

Question. That would be March Fong Eu?

Answer. Exactly. Who was in town and wanted to talk to me, and so she was one of our Ambassadors and she wanted to, what I assumed was a courtesy call, come and see me.

When she came, she brought two gentlemen with her, and one of them was John Huang. I thought that he worked for her. I didn't know he even worked at the DNC until at the end of the meeting, he gave me his card.

Question. And that card was from the DNC?

Answer. Yes. And I said, Oh.

Question. So March Fong Eu is the person who set up the meeting with you?

Answer. Yes, she called and asked for the meeting and, you know, I gave a, you know, gave a time for her to come, and then she asked that two other people be cleared with her.

Question. And do you recall who the other person was?

Answer. No. Someone who I believe worked with March.

Question. That is March, Fong Eu, E-U.

When—you got this call personally from Miss March Fong Eu?

Answer. I don't know if I did or not. I don't remember if I did or not.

Question. Do you recall generally what your understanding of what the purpose of the meeting was?

Answer. Just that she wanted to have a—to make a courtesy call, that she was a U.S. Ambassador and if any U.N. Ambassador called my office and wanted to stop by, I would sit down and talk to them.

Question. Okay. Do you know at that time if she was involved in fund-raising at all?

Answer. No, I thought she was the Ambassador of Micronesia.

Question. Did you have any understanding of any role she played in fund-raising?

Answer. No, I didn't. It seems to me, I think she had worked during the campaign, I don't know where, but I don't know if she worked in the campaign doing fund-raising, if that is what she had told me or not.

Question. You mean the '92 campaign?

Answer. '92, but that is all. I wouldn't know.

Question. So she didn't discuss with you any fund-raising for the '96 campaign or for the DNC?

Answer. No. I mean, primarily what she discussed with me was wanting to get out of Micronesia, that she, you know, I am totally paraphrasing, but she had tired of that post and wanted to do something else.

Question. Were you aware—did she tell you she talked to the President about this?

Answer. No, not that I recall.

Question. Were you aware of her being in communication with the First Lady about any of these matters over any time while you were at the White House?

Answer. No, not that I recall. Like I said, the only time I remember her, meeting her or knowing anything about her, is when she came to see me.

Question. And you think that is what this May 9th reference—the only time you ever met with John Huang was in this meeting with March Fong Eu?

Answer. That was the only time I have met him to even know who he was was in that meeting. Prior to that, I didn't know who he was.

Question. Okay. If you could tell us how your call list works, who do you—what is the call list?

Answer. There is not really a process. I mean, if I had a lot of pink slips hanging around my desk or if I have left them on Evan's desk, they are just trying to catch up and make sure that I returned calls.

Question. So this call list is a—you know, she has a bunch of calls?

Answer. They could be for over a month, you know. It could be like, you know, she has to call these, or in—and the call list doesn't even have to be a list, it can be that they, you know, staple this together with all the other calls.

Question. And returning to the meeting then with March Fong Eu and John Huang, during this discussion, John Huang never raised or discussed the fact that he was doing DNC fund-raising?

Answer. No. As I said, it was after the meeting when he gave me his card. Up until then I thought he was a staffer for the Ambassador.

Question. All right. And do you recall then calling him, if it was before or after this meeting, calling him?

Answer. For some reason I think I talked to him afterwards, but I think he had—I am not sure, but for some reason I recall him or a situation where he was thanking me for meeting with March Fong Eu, and I don't know if it was a call, but that is the only other contact I can even imagine having with him.

Question. And did—it is your testimony that March Fong Eu did not tell you she wanted to do fund-raising; any discussion of fund-raising was that she had previously been a fund-raiser?

Answer. There is something I remember about her having worked in California in '92, she said, but her—I mean, and this wasn't a very long conversation, as it turned out, but the thrust of it was that she did not want to be the Ambassador of Micronesia; she was ready to leave Micronesia.

Question. And you said it wasn't a very long meeting. Do you recall how long it lasted?

Answer. No. It just seemed very brief.

Question. What did she say to make you think she really wanted to leave or how did she express that?

Answer. Well, I mean, I tell you, this is where I would have some reservations because it was a private conversation and I never want to be in a position of saying someone feels in some way, you know, ungrateful or wasn't pleased. It was a private conversation but it was clear she was ready to leave Micronesia.

Question. Are you sure she was not expressing anything about she could be used better in fund-raising, put me into fund-raising, anything like that, that I could do that for the party or for the campaign?

Answer. I assume with any Ambassador who wants to leave, the general course is they want to do something else. I don't know what her something else was, but I assume whatever the next something else was was something she wanted us to help her with, she wasn't specific with me, except to say that she was ready to move on.

Question. And do you know why she had picked you to meet with and discuss this with?

Answer. I have no idea why people pick me.

Question. You hadn't met her before?

Answer. No, I have no idea. I have people who call me all the time. I have no idea why people pick me. I mean, they clearly believe that being the First Lady's chief of staff means maybe I will listen to them and I will listen to most of them but not necessarily do.

Question. And this is to relay she wanted a different job within the administration?

Answer. She did not say I want to relay; all I recall is that it was clear she did not want to be in Micronesia.

Question. I am trying to understand why she was telling you that.

Mr. BALLEN. I think the witness has testified, these questions are asked and answered.

The WITNESS. It is the same reason people write me and say, please get my son out of prison. I mean, they equate by title some power to do something, which you may not have at all. I don't understand. There is a great motivation out there.

EXAMINATION BY MS. COMSTOCK:

Question. Well, did she ask you to relay her sentiments to the President or the First Lady?

Answer. What she said to me was essentially that she was tired of being in Micronesia. She did not, as I recall, specifically say to me, tell them, the President or the First Lady this.

Question. Do you know a John Emerson at the White House?

Answer. Yes.

Question. And are you aware of—could you just tell us what he does or what he did at the White House?

Answer. I think he was in intergovernmental affairs.

Question. And did he work on issues related to California?

Answer. Yes, I think he was from California.

Question. Were you aware of him being in touch with March Fong Eu?

Answer. No.

Question. Did you ever talk with him about any conversations he had with March Fong Eu about wanting to leave Micronesia, if she ever discussed that with him?

Answer. No.

Question. So you never had any discussions with Mr. Emerson about what you talked with March Fong Eu about?

Answer. I listened to March Fong Eu and then she left.

Question. And that was the end of it?

Answer. As far as—I mean, I don't remember any follow-up, you know. I don't know if she wrote me a thank you note or anything, I don't remember. That is the last thing I remember about her.

Question. And I'm sorry, you may have testified to this previously, are you aware of any correspondence she sent to the First Lady about the kind of sentiments she expressed to you in this meeting?

Answer. I don't recall any. I mean, I don't recall it. I mean, there are hundreds of letters that Mrs. Clinton gets. I don't see all of them. So I don't recall.

Question. Well, a letter from an Ambassador, would that be brought to your attention?

Answer. Not necessarily, depending on how it was sent.

Question. Can you generally describe what the process is? Not just sort of the average, if I am the guy calling to write a letter, but if I am an Ambassador or some type of dignitary writing a letter to the White House, what is the process that goes through?

Answer. I don't know if every dignitary has this available to them but I do know for people who have known them over time, there is a special zip code that takes that particular mail into personal correspondence and outside of kind of the regular mail of all the people, and then those letters don't come to me, they can go to Mrs. Clinton's assistant, Pam, they can go to personal correspondence. If they are a friend, they will be answered there, and some of those letters can make their way up to her.

Question. Okay. So your testimony on the March Fong Eu meeting is that you had not met her before?

Answer. No.

Question. She called, the meeting was set up, you had this discussion, and then you never met or discussed these matters again?

Answer. No.

Question. No, you never met again?

Answer. No, I never met her again, no.

Question. Then with John Huang, this was the first time—he was brought along and this was the first time you met him?

Answer. The first and only time I have met him.

Question. Then as to the call list, you believe you may have called him after this meeting?

Answer. I can only—there is only—I mean, this is total speculation, and I will speculate, since this is printed here. I remember John Huang thanking me. Now it could be because he called me to thank me for seeing March Fong—I forget her name.

Question. Eu.

Answer. Eu. And I called him back, I was returning a call. But otherwise I had no—I didn't know him.

Ms. COMSTOCK. We have got Deposition Exhibit No. 22.

[Williams Deposition Exhibit No. MW–22 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Let me stay in the general area of John Huang. When the issues about John Huang's fund-raising arose during October of '96, during the campaign in the

closing weeks, did you have any discussions with people at the White House about John Huang?

Answer. I don't remember any specifically, but I can't imagine I never had a conversation about, you know, the news, he was in the news.

Question. Do you recall any conversations with people about, you know, the issues involved on how he raised money or what he was doing?

Answer. No.

Question. Do you recall telling anyone in the counsel's office or elsewhere that you had met with John Huang?

Answer. No. I guess I had characterized him as meeting with John Huang. I had, up until the time he left, thought I was meeting with Ambassador Eu and her two assistants.

Question. Okay. So you never talked with the First Lady or the President about John Huang?

Answer. No, I never had to.

Mr. BALLEN. I'm sorry?

The WITNESS. I said, no, I wouldn't have a need to.

Question. Turning over to Charlie Trie and the meeting that you had with Mr. Cardozo, do you have any knowledge of Mr. Trie—have you learned any to date of Mr. Trie being at the White House on the same day that you had the meeting with Mr. Cardozo?

Answer. No.

Question. Do you have any reason to believe that he had been invited to the meeting or was there to explain to anybody anything about the contributions?

Answer. No, no.

Question. Okay. And at the time, if you recall, that the information about Charlie Trie and legal defense fund was becoming public and the process inquiry, what happened then? What was your involvement?

Answer. I think the issue was that—and I don't know if it was a network or a newspaper, but I believe the issue was that—whether or not simply to answer the one inquiry that had come in, or whether or not to kind of call all the media people up on, you know, all the media people in, talk to them all at once about this particular issue. That was the heart of it.

Question. And do you recall suggesting—anyone suggesting Mark Fabiani be called, involved in this?

Answer. Oh, yeah, I did.

Question. And what was your suggestion?

Answer. Oh, you know, I said the person I think who would know whether or not to call one or to call all would probably be Mark Fabiani.

Question. And at the time in December when this was being discussed, how to respond to making it public, did anyone raise the issue that Mr. Trie had just been at a White House dinner or had been at a trustee dinner?

Answer. You know, I vaguely remember something about this, but I don't—I kind of more remember it literally in terms of hearsay. And I don't know if it was from press accounts or whatever. I don't remember discussing it.

Question. Do you recall who else was involved in these discussions and meetings?

Answer. Oh, about the press inquiry?

Question. Uh-huh.

Answer. I know that Evelyn Lieberman was.

Question. And do you recall what her role was in discussions or suggestions?

Answer. No, I think it was just on the—I'm pretty sure that I have the issue right, that it was responding to one press inquiry or responding to—or—or trying to make information available to everyone at once.

I remember that Evelyn was involved in giving advice. I don't remember what her advice was, but she's the former communications director. I'm trying to think if anybody else was around. For some reason I just remember Evelyn.

Question. And have you ever had any conversations with the President or the First Lady about Mr. Trie or anything having to do with Mr. Trie?

Answer. No, I haven't. Not about Mr. Trie, huh-uh.

Question. Do you know someone named Crawford who works at the White House? Is it Kelly Crawford or is it somebody——

Answer. Oh, there's a Kelly Craighead.

Question. No, Mr. Trie was meeting with a Crawford on May 12th, '94.

Answer. Huh-uh.

Question. Which was the date of the health care donations that we were previously discussing with Mr. Trie?

Answer. Kelly Craighead. I don't know Kelly Craighead.

Question. I don't know if it's Kelly. I was thinking of that name, too. It was Crawford on the names in the WAVEs, and I don't know what the first name is. You don't know a Crawford who was involved in health care matters?

Answer. No, although there were a lot of people involved in health care, I don't know of one.

Mr. BALLEN. Excuse me, counsel, could we have a brief break?

Ms. COMSTOCK. Okay. How about if I just finish up this area on Trie and then we could break. Would that be okay? And then I think we would just be going to the Johnny Chung matters and then we will be done.

Mr. DENNIS. That will be fine.

EXAMINATION BY MS. COMSTOCK:

Question. Have you ever had any discussion with anybody at the White House about Mr. Trie being at the White House, you know, frequently and meeting with the President and the First Lady?

Answer. I can only think that informally, after the news—I mean, I can't imagine that I didn't discuss ever what was in the newspaper with people.

Question. Who arranges, when the First Lady gets pictures taken at the White House, who arranges for that?

Answer. Usually through scheduling.

Question. And so that would be Patti Solis?

Answer. Patti Solis. It could be Capricia Marshall, depends on where the picture is being taken, who might arrange for it.

Question. And somebody has to make a request to those people and they set it up?

Answer. Well, we have—we have a couple of ways. I mean, you can make a request through those people and they can set it up. Which, you know, which happens.

In the First Lady's office we have hit upon what I think is a great idea, since we get so many requests at the last minute for photos, is that if Mrs. Clinton is on her way out the door to go somewhere, to give a speech or whatever, we have a couple of things that are already working for us. One, she doesn't have to spend a long time. She's walking out the door. And, two, there's a photographer probably in hand; and, three, she's already made up and whatever.

And so we have a tendency of trying to push as many planned and unplanned photographs into any time when we know she's walking out the door, so—and you have got the nice background of the Diplomatic Room. And so generally that can be done fairly quickly with the scheduler, or even calling over to—calling over to her personal assistant, Capricia Marshall.

Question. Is this a daily routine, then?

Answer. It can be——

Question. Or you try to schedule them on particular days of the week?

Answer. No, the only thing we really try—it really does go with her schedule. If she's walking out the door, we can do it. And I think that Patti makes a genuine effort, even on the planned ones where we might have, you know, like 20 people which we sometimes have, to push them on days when she's got—when it won't take, you know, more than 10 or 15 minutes. And we might do five, six, seven, eight photos and then out the door.

Question. Get groups to come in and just line up and do sort of cattle call and move them through?

Answer. Yeah, whatever we want to do. A staff person is leaving, this is their last day, call them up, we can do a photo. So we do it that way. I mean, it takes a lot more if we are doing—and we have done schools and whatever, you know. That's another kind of photo.

But this method works great for us, and we've also got a method on receiving lines. Anything that has to do with photos, we pretty much are the experts in getting them done and doing them quick.

Ms. COMSTOCK. I believe we can take a little break here.

[Recess.]

EXAMINATION BY MS. COMSTOCK:

Question. I just have a few little miscellaneous things I want to go through first. Then we will go into the other areas.

This is a phone message to you from Yusuf Khapra in Erskine Bowles's office for October 13, 1996, from Mark Middleton, and it says—he said that it's very important that you get in touch with Mark Middleton, who is at the following number. And then it says call Yusuf if you have any questions.

This is mid-October, during the middle of the campaign, if it helps in placing it in time. The John Huang stories were well in circulation at this time, along with the Webb Hubbell issues, the Safire column and things like that. Do you recall ever talking to Mark Middleton in the middle of October, first, at all?

Answer. I don't recall. I could have. I mean, if he called me, I would have talked to him.

Question. Do you recall if you talked to him about any matters related to John Huang and Webster Hubbell in the time frame of October 1996?

Answer. No. First of all, I can't imagine talking to Mr. Middleton about John Huang, who I didn't know, or what could be said about Webb Hubbell. If I was asked to call Mark Middleton, I know I would call him. So, I mean, I wouldn't deny that if I was asked to call him that I wouldn't call, but I don't know necessarily what this is about.

Question. It says that he said that it's very important.

Answer. I don't know. Very important to Mark Middleton could be "I've got to get into the mess." I mean, I just really do not know. But I'm happy if you have anything else that might refresh my memory on it.

Question. Actually, this phone number that's on here, I did make a call to it and it is a Dominican Republic hotel, if that helps at all.

Answer. Get out.

Question. Do you recall if you called him, or why you would have called him, if you knew what he was doing in the Dominican Republic?

Mr. BALLEN. Well, is that what it is now or what——

Ms. COMSTOCK. That's what it is now when I called this past weekend. That's what I got. I don't know. Apparently that exchange must be the Dominican Republic. I don't know if it was a hotel.

Mr. DENNIS. That's the Caribbean.

The WITNESS. I just don't know.

EXAMINATION BY MS. COMSTOCK:

Question. It doesn't ring a bell, him being in the Dominican Republic and him calling you with something very important from the Dominican Republic?

Answer. No, it just doesn't.

Question. Okay.

Answer. I'll try and think about it. I just don't know.

Question. Do you recall generally ever discussing any matters related to Mr. Hubbell with Mark Middleton?

Answer. No.

Question. Let's see, there were just a few other items. We've generally discussed a few Harold Ickes memos today, and I'm not going to go a lot into Mr. Ickes's documents, but a number of them—a lot of them were cc'd to you. I'll just give you—I'm not sure if this is a whole package or this is all together. I am sorry.

This is a June 5, '95 memo about '96 reelect fund-raising projections and expenses, and you are cc'd on this memo. It's a memo to the President and the Vice President. It's marked "the President has seen." Do you recognize the handwriting that's in sort of dark pen?

Answer. This right here?

Question. Yes.

Answer. This looks like the President's.

Question. And I think the other handwriting on there is just somebody's translation of the President's handwriting because it says the exact same thing, just in somebody else's handwriting that's a little easier to read.

Do you recall generally, first, before going into this specifically, getting the Harold Ickes memos circulated to you on a regular basis?

Answer. Yes, I do.

Question. And can you describe what, you know, being on the circulation of those memos, what was your role in getting them or what did do you with them?

Answer. If I had time, I would read them. If not, I would collect them hoping to read them, and then after a week or so I'd just throw them away.

Question. You did not maintain them anywhere?

Answer. I mean, there were thousands of memos from Harold. I mean, no one could—could both do their work and read Harold's memos.

Mr. BALLEN. When you say thousands, is that a literal number or just a figurative number?

The WITNESS. I'm sorry; figurative. I'm sorry.

Mr. BALLEN. A lot?

The WITNESS. Quite a few.

EXAMINATION BY MS. COMSTOCK:

Question. Do you generally recall the memos that you got from Harold Ickes, generally what they were about?

Answer. It seemed like they were about everything. It could be about campaign, could be about convention, could be—I mean, it could be about any number of things.

Question. The DNC?

Answer. It could be about the DNC.

Question. What understanding do you have of Harold Ickes' role vis-a-vis the DNC?

Answer. Main liaison. The President's political person.

Question. Were you aware of people at the DNC having to get Harold's approval before they could—for basic day-to-day—him controlling—they have to tell him what they're doing before they spend money or take major actions at the DNC?

Answer. I'm not aware of what they asked Harold day-to-day. I would say that he had some reasonable influence there.

Question. Did you understand him to have a day-to-day working relationship with the DNC?

Answer. Day-to-day? I don't know if he talked to them day-to-day.

Question. In particular, say, from fall '95?

Answer. I just don't know.

Question. Through the election?

Answer. Honestly, we are in two different buildings so I don't know what he did day-to-day. As I said before, it was clear to me he had a reasonable influence upon people at the DNC. But anybody who was involved in the President's political business, he had an influence.

Question. And you had indicated previously that you didn't realize until recent press accounts that Harold was opposed to the large media campaign that Dick Morris had recommended. Did you ever get any of the memos from Harold Ickes sort of opposing Dick—did you ever get any memos from Harold Ickes that were opposing this campaign of—spending campaign that Mr. Morris was recommending?

Answer. I could have gotten it—if it came in his regular circulation of memos, I could have gotten one that said that.

Question. I'm just asking if you recall getting any such memos where he was discussing, you know, being opposed to Mr. Morris's efforts or——

Answer. No, I guess I didn't think of Harold as being opposed to anything that was going on in the campaign. I think he was opposed to Dick Morris. I just think it was a personality thing. That's how I always viewed any opposition he had.

Question. And you had an understanding of that at the time, that they were antagonistic with each other on everything sort of generally?

Answer. It was in the newspaper every day during the campaign.

Mr. BALLEN. I object to this line of questioning about the friction between Morris and Ickes.

Ms. COMSTOCK. I don't think it is a line of questioning here. The witness brought up——

Mr. BALLEN. I object to the question. It's irrelevant and beyond the scope.

EXAMINATION BY MS. COMSTOCK:

Question. When you got the type of memos here, this CGRO–13451 and its attachments, when you got this type of memo, what was—do you know if you ever had—provided any feedback to Mr. Ickes or discussed it with the First Lady or kind of took any action based on this type of memo, or if you recall this one in general, anything you did?

Answer. I mostly stacked them. I figured if there was anything that was really of importance that Harold wanted me to focus on, he or Doug would call me.

Question. Okay. And were there particular things that Harold would call you about to focus on?

Answer. Scheduling. Hillary's scheduling.

Question. And what type of scheduling was that?

Answer. He wanted her out in the country.

Question. Okay. And previously you had said you thought you may have gotten a memo from Mr. Ickes about the phone calls. And I just wanted to show you——

Ms. COMSTOCK. Why don't I make this previous, this other memo Deposition Exhibit Number—oh, yeah, I'm sorry, the Yusuf Khapra message about Mark Middleton that had the Dominican Republic phone number, we will make that Deposition Exhibit Number 23.

[Williams Deposition Exhibit No. MW–23 was marked for identification.]

Ms. COMSTOCK. And then we will make this June 5th, '95 memo Exhibit 24.

[Williams Deposition Exhibit No. MW–24 was marked for identification.]

The WITNESS. Is this the best copy?

EXAMINATION BY MS. COMSTOCK:

Question. And moving on to a new memo, which is a November 28th, '95, memo to the President and Vice President from Harold Ickes and cc'd to Leon Panetta, Erskine Bowles, Maggie Williams, Ron Klain, David Strauss, Doug Sosnik, Karen Hancox, Chairman Dodd, Chairman Fowler, Marvin Rosen and Scott Pastrick, regarding fund-raising efforts for DNC media.

And I direct your attention to the bottom of the page where it says, number 1, Based on our 28 November meeting, Marvin Rosen thinks it unrealistic to expect the raising of new money that will actually be deposited during calendar year 1995 in excess of $1.2 million. This amount can be raised, in his opinion, only under the following circumstances. And then it lists approximately 20 phone calls by the President, approximately 15 phone calls by the Vice President, and approximately 10 phone calls by HRC. It goes on to have some other items, too.

But does this refresh your recollection in terms of any discussion about the phone calls or knowledge you may have had about the phone calls?

Answer. No. Once again, this was raised or shown to me at a previous deposition. My sense is, once again, if they wanted me to do something with respect to Mrs. Clinton making phone calls, they would have called me. I mean, everything that was written down in a memo, I couldn't take as—if someone wanted to follow up on it, I figured I'd be called.

Question. And did, in fact Mr. Ickes or Mr. Sosnik ever call to you ask you to——

Answer. No.

Question [continuing]. Discuss the phone calls with the First Lady?

Answer. No.

Question. And the $1.2 million here, generally, like this is the only way to raise the money, do you ever recall any discussion about the only way we can kind of get to some targeted goals is by having these phone calls?

Answer. No. I mean, I don't recall discussions that said the only way we can get to those goals is by these phone calls.

Question. Okay. Do you have any other—aside from what you testified today about the phone calls, do you have any other knowledge about the phone calls, aside from press accounts, phone calls made by the President, the Vice President or the First Lady for DNC fund-raising?

Answer. By press accounts only.

Question. Okay. So for any—you weren't involved in any of the—whether there was controlling legal authority to make phone calls or where phone calls should be made from or anything like that?

Answer. Oh, no, I was not.

Ms. COMSTOCK. I will make that Deposition Exhibit Number 25.

[Williams Deposition Exhibit No. MW–25 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. This is a January 31st, 1996 memo to the President and the Vice President from Harold Ickes, again. You're cc'd on this about estimated DNC and other expenditures for calendar year 1996. CGRO–13667 through 69.

Just in general, are there any particular memos that you recall from Harold, I'm just providing you this as an example, but any particular memos that you received from Harold, that you recall sort of taking action on or becoming involved in issues that he had generated from his memos?

Answer. Once again, if there was any particular action that Harold wanted me to take or Doug wanted me to take, I knew that I could expect that they would call me and they would lay out to me what it was that they were interested in. I mean, I just did. I couldn't possibly have followed up on everything that was written in these memos.

Half of it I didn't understand. But, more than that, a lot of it I didn't think that it was—had anything to do with my purview. I mean, my view was that my job in the campaign was to keep Hillary Clinton out there and on the road. That was my first—I think that was my first job in relationship to the campaign.

Question. Okay. Showing you an August 6th, 1996, memo from Harold Ickes to the President and the Vice President, marked the President has seen, 8/5/96. And it's regarding DNC budget/fund-raising meeting of August 1st, '96.

Do you recall generally discussions in any meetings you were involved in or having discussions with Harold Ickes or others at the White House about the DNC budget in general? Was that something that you were involved in discussions about?

Answer. I think I attended one meeting early on—I don't know when; it seems to me way before the campaign about the DNC budget—in the residence. That was the only meeting I remember; and it was mostly just what their budget was, as I recall. But it seemed, you know,—I do remember one meeting about the DNC budget.

Question. And do you recall any discussions about having Mr. Ickes have more control over the budget or reviewing the budget of the DNC?

Answer. Having more control over it? No, I don't remember any discussion.

Question. Were you aware of any people at the White House who worked with Mr. Ickes who reviewed DNC budget numbers or contracts or anything like that?

Answer. No, I was not aware of that.

Question. Do you know a Jennifer O'Connor who worked for Mr. Ickes?

Answer. Yes, I do.

Question. What was your understanding of what her role was at the White House of her job with Mr. Ickes?

Answer. I don't know. I just thought she worked in political. I don't know what she did specifically.

Question. Do you have any knowledge of her being involved in reviewing any budget matters for the DNC?

Mr. BALLEN. I'm sorry, counsel, I can't hear the question.

EXAMINATION BY MS. COMSTOCK:

Question. Do you have any knowledge of Ms. O'Connor doing any budget matters for the DNC, working on that?

Answer. No, no, I didn't.

Ms. COMSTOCK. I will mark this document Deposition Exhibit 26.

[Williams Deposition Exhibit No. MW–26 was marked for identification.]

Ms. COMSTOCK. Can we just go off the record for just a minute?

[Discussion held off the record.]

EXAMINATION BY MS. COMSTOCK:

Question. Were you aware of Harold Ickes ever meeting with any labor union PAC people at the White House?

Answer. No, I wasn't aware of his schedule—if I wasn't involved in it.

Question. Were you ever involved in any meetings where Mr. Ickes had labor union people at the meetings discussing media buys or media—the kind of commercials the unions were going to run or anything like that?

Answer. No, no.

Question. Okay. I just wanted to go through a few questions on Mr. Hubbell.

Mr. BALLEN. I'm sorry?

Ms. COMSTOCK. On Mr. Hubbell, Webster Hubbell.

Mr. DENNIS. Hubbell.

EXAMINATION BY MS. COMSTOCK:

Question. While you were at the White House you came to know Webster Hubbell; is that correct?

Answer. Yes.

Question. When he was Associate Attorney General?

Answer. Yes.

Question. Did you know him prior to your joining the White House staff?

Answer. I met him in the campaign. I never worked with him, but I met him. Well, actually, I met him right after the election.

Question. And you knew him to be a close friend of the President and the First Lady?

Answer. Yes.

Question. Did you work on any matters with him while he was at the Justice Department?

Answer. No.

Question. So any occasion when you would be calling him or dealing with him at all, would that be sort of a social or sort of a ministerial kind of—you know, come over for an event or anything like that?

Answer. No, I didn't have any substantive matter that I worked with Webb on. No.

Question. Do you know if he was involved in any health care matters that you worked on?

Answer. Not that I—not that I worked on. He may have been involved in tort reform issues around health care, but that would be the only thing that makes sense.

Question. At any time prior to his announcing his resignation, which is March of '94, were you aware of any problems that he had with his law firm?

Answer. No.

Question. Were you aware of any sort of, in the months leading up to his resignation, of people from the law firm attempting to get in touch with the First Lady with Mr. Hubbell?

Answer. No, huh-uh.

Question. Have you ever discussed with the First Lady any of Mr. Hubbell's problems related to the Rose Law Firm?

Answer. No, not related to the Rose Law Firm.

Question. And in that—the meetings in relation to the billing problems and the mail fraud, I guess the things that he pled guilty to, that kind of thing?

Answer. No.

Question. Did the First Lady ever express anything to you about Mr. Hubbell had defrauded her or anything like that?

Answer. No.

Question. And—at any time?

Answer. No.

Question. No? She had made some statements on Larry King this year when she was on TV, you know, that he was a partner; you know, I was a victim, too. Did you ever hear the First Lady say anything like that to you at any time over the past 4 years or so?

Answer. No, the only thing that she's ever expressed to me regarding Webb Hubbell is, you know, tremendous sense of sadness about it, about him.

Question. About his situation?

Answer. Yes, uh-huh.

Question. And nothing about specifics?

Answer. No.

Question. Or anything about what he—did she—did the First Lady ever mention what he said to her? You know, he told me he didn't do anything like—anything like that?

Answer. No, she would never say that to me.

Question. Do you know a gentleman named Jim Blair?

Answer. Yes.

Question. And do you have occasion to see him at the White House frequently?

Answer. I didn't see him frequently, but I've seen him at the White House at events.

Question. And in the 1993 time frame, is it correct that Diane Blair stayed at the residence quite a bit?

Answer. I don't know quite a bit, but I know that she's a friend of Mrs. Clinton, and she's stayed at residence. I don't know how many times.

Question. Do you have any knowledge of her being camped out or living at the White House in '93?

Answer. Camped out?

Question. She had a class, I think she was teaching, something to that effect, where she was kind of based at White House in '93.

Answer. Oh, I think that she was based—I think that she had a class, and I don't know if it was every 2 weeks or every 1 week, and she would fly in and fly back out. That's what I thought. But I wasn't at the residence, but I do remember that she was teaching a class somewhere.

Question. And do you have any knowledge about Mr. or Mrs. Blair's involvement in any matters related to Webster Hubbell?

Answer. No.

Question. Did you have any knowledge about Mr. Blair calling the President or the First Lady to discuss any matters related to Mr. Hubbell?

Answer. No.

Question. When did you first learn about that Mr. Hubbell was going to resign?

Answer. I don't know—I don't know if I learned the day he resigned or the day before he resigned, but it was very tight in there.

Question. He resigned on March 14th, 1994; and there has been reported in the press a meeting that Sunday, March 13th, that even, the night before, a meeting where at the end of the meeting Mr. McLarty brought up the issue of, you know, I'm going to help Webb. He said something to that effect. It may have been an afternoon meeting. It was sometime on Sunday of March 13th.

Do you have any general recollection of a meeting that was close in time prior to Mr. Hubbell's resignation where anything like that was discussed?

Answer. I have a recollection of a morning meeting, maybe a Sunday morning meeting—actually, a Sunday morning meeting. I don't know the date of it. And this is pure—I mean, this is kind of based on having read news accounts, but the only meeting I can think of is a meeting that was held actually to discuss, I think, the resignation of Bernie Nussbaum, the White House.

Question. Which had been approximately I think on March 4th, '94, or thereabouts, a week or so before Mr. Hubbell resigned?

Answer. Yeah.

Question. 10 days.

Answer. I mean, I remember attending a meeting on a Sunday morning about the White House Counsel's Office.

Question. And do you recall Mr. Ickes being at that meeting?

Answer. No.

Question. Or Mr. McLarty?

I'm sorry. I'm not representing that Mr. Ickes was there. I'm just seeing if you—I know Mr. McLarty was at a meeting on the 13th, so if——

Answer. Well, I don't actually recall Mr. Ickes being there. I'm trying to think. I mean, I recall—I recall Mrs. Clinton being there. I recall the President being there. I recall—I don't know if I recall Mack being there. I just think he ought to have been there. But I recall Mack McLarty—but there was a meeting on Sunday morning about Mr. Nussbaum's resignation.

Question. And could you just tell us generally about that meeting?

Answer. Well, I just think it was about his replacement, what issues, and generally about the arrangement and organization of the counsel's office.

Question. And were you aware of any sort of general discussion of sort of how sort of damage control operations were going to be handled on these and matters of Mr. Hubbell?

Answer. I guess I wouldn't have talked about it in terms of damage control. I would really talk about it in terms of——

Mr. BALLEN. Excuse me. The question was related to Mr. Hubbell.

The WITNESS. Oh.

EXAMINATION BY MS. COMSTOCK:

Question. I'm sorry. Maybe, just generally, did you discuss—was there any discussion—why don't I strike the last question and start over? was there any discussion in this Sunday morning meeting that you recall of generally of how we are going to approach sort of Whitewater matters, Mr. Nussbaum, Mr. Hubbell, or was it—I'm trying to see if there was a more general discussion of—sort of on March, '94, was sort of a problem——

You had subpoenas coming in at that point, and Mr. Nussbaum had resigned, and Mr. Hubbell was about to resign, and would those matters all going on—the special counsel, Mr. Fiske, had been appointed in January. And I was wondering if there was general discussion in this meeting about how to approach all of these things as you go forward with your other duties.

Mr. BALLEN. Excuse me. I am going to object to this question on two grounds: One, you have asked, I think, three questions in that last question, so it's going to be hard for the witness to separate them out.

Secondly, I'm going to object to it generally. The witness has testified that this meeting was about the Nussbaum resignation, not about the Hubbell resignation. So I'm going to object to any questions as to the circumstances of the Nussbaum resignation.

If you want to ask the witness was Hubbell discussed and the resignation, I would have no objection to that. But insofar as it goes beyond to yet another matter, I would object to it.

EXAMINATION BY MS. COMSTOCK:

Question. Well, I mean, we've—you know, we are generally talking about the Sunday morning meeting here that you recall. We—the White House—we've reviewed notes from the White House that indicate—and others whether this is the same one or a Sunday meeting on March 13th, which is the day prior to Mr. Hubbell resigning—which indicate there were sort of a general discussion of this.

What I'm trying to find out is if you recall at this or another meeting a general discussion of sort of how to handle all of those various matters that I just previously described.

Answer. I don't recall a discussion about Webb Hubbell's resignation at this Sunday morning meeting. What I recall is it was a meeting about the Nussbaum resignation and how to handle the different areas that the Counsel's Office would have to involve itself in, and that really was the focus.

Question. Was there a discussion of how to respond to subpoenas or how you were going to go forward with matters at that time?

Answer. Those things could have been discussed, but my recollection, my recollection of the meeting, and maybe it is just because I bring a certain perspective, was it was much more structural and more about the leadership of the office itself, a structural and a personnel issue, which was quite frankly where I would be focused.

Question. Was there any discussion of what Mr. Ickes's role would be in responding to any of these Whitewater matters or Mr. Hubbell or any of those, what his role would be?

Answer. I really don't recall a focus on Mr. Ickes. I mean, I just don't recall that. I mean, in my mind, I just remember—this is the meeting on the Counsel's Office.

Question. If it is not this March 13th meeting that we have reviewed notes on, or if it is not the Sunday morning that you recall, do you recall at any other time discussing Mr. Hubbell's resignation or any issues related to that prior to his resignation?

Answer. No, I do not.

Pardon me, let me just amend that a little bit, because I don't know if I learned about Webb's resignation the day of his resignation or the day before. It was pretty tight, so I don't know if there was any discussion, or if it was just announced the day before to the staff.

Question. Okay.

Answer. That is kind of what I think happened.

Question. Okay. And this meeting the night before where Mr. McLarty has indicated that at the end of the meeting he said to the First Lady, you know, I am going to be helping Webb, do you have any recollection, do you have any knowledge about that?

Answer. No.

Question. You don't recall that exchange or that discussion?

Answer. No.

Mr. DENNIS. Do these notes place my client at that meeting?

Ms. COMSTOCK. Yes, the White House notes. But I am trying to be fair here and make the record clear. It has been indicated—the notes from that March 13th meeting indicate she was there. The notes do not have any—they do not discuss the actual notes that are on the meeting. There are some separate notes, and Mr. McLarty has publicly indicated that at the end of the meeting, so I want to clarify that.

EXAMINATION BY MS. COMSTOCK:

Question. But do you recall any discussion with Mr. McLarty about Mr. Hubbell?

Answer. Me?

Question. With you.

Answer. No.

Question. Okay. Were you aware of any efforts by anybody at the White House to assist Mr. Hubbell in obtaining employment?

Answer. Only what I know from the newspapers.

Question. Okay. So from the time he announced his resignation until the newspapers, you had heard nothing about anybody at the White House or any friends of the President or First Lady attempting to assist Mr. Hubbell in getting a job or consultant contract?

Answer. No, I have not.

Question. So I can assume you had no knowledge of him attempting to settle any of his legal problems with the Rose Law Firm?

Answer. No, I don't know anything about that.

Question. Do you have any knowledge of Mr. Hubbell being in touch with the First Lady after his resignation, what his—how often he was in touch with her?

Answer. No, I do not.

Ms. COMSTOCK. Okay. I am showing the witness EOP 58979 through—actually, it is a variety of things. It is a grouping here. On 58980 there is a message to Pam. It says, Webb Hubbell, he wants to talk with Mrs. Clinton.

EXAMINATION BY MS. COMSTOCK:

Question. Is there a Pam in your office?

Answer. No, she actually works in the West Wing in Mrs. Clinton's office, Pam Cecetti.

Question. Okay. And that message was dated April 8, and then there is an April 13th message with Mrs. Clinton, and then a June 10, '94 message with Mrs. Clinton.

Did you have any knowledge about—does this refresh your recollection as to whether Mr. Hubbell was in contact with Mrs. Clinton during this time frame?

Answer. No.

Question. I'm sorry, I gave you my copy.

Answer. I'm sorry.

Question. That is okay. You are looking at my little scribbles, that is okay.

Answer. They don't mean anything to me.

Question. So generally did you have any sense of whether the First Lady continued to be in touch with Mr. Hubbell, or didn't or did you not know either way?

Answer. I do not know either way.

Question. Do you have any knowledge about Mr. Hubbell working out of Mr. Cardozo's office?

Answer. No.

Question. Do you know a Michael Berman?

Answer. Yes.

Question. All right. He was in touch with the First Lady's Office and people at the White House somewhat frequently?

Answer. Somewhat frequently, yes.

Question. Do you have any knowledge that Mr. Berman was assisting Mr. Hubbell in any way?

Answer. No, I do not.

Question. I assume you have no knowledge, then, of anything related to the Lippo Group or Mr. Hubbell receiving $100,000 from the Lippo Group?

Answer. No.

Question. Have you had any discussions with anybody at the White House about Mr. Hubbell working for the Lippo Group?

Answer. No.

Question. When any of those articles appeared, did anyone at the White House ever comment to you about, gee, I had heard about that, or that is not true, no, he didn't make that much money or make any type of comment in general about, first, the allegations, then sort of later the account of Mr. Hubbell making that kind of money?

Answer. Not specifically. There may have been a general discussion as there is about the news.

Question. Can you recall who generally who you discussed that with?

Answer. Oh, God, I don't know. It could have been anybody.

Question. Do you know if you ever spoke with the First Lady about that?

Answer. No.

Question. Generally people in your office you would have discussed that with?

Answer. Oh, I don't know. It's so general. I mean, it is just like—you know, becomes kind of a current event, I mean, did you read the newspaper about such and such, yes, I read it.

Question. Were you surprised to read that Mr. Hubbell got upwards of half a million dollars in the year after he left the Justice Department?

Answer. Nothing surprises me.

Question. Did anyone ever comment to you about they were surprised? I mean, can you think of anyone in particular that ever made a comment one way or the other about knowing about anything related to that?

Answer. No.

Question. Have you ever discussed any of those matters with Mr. Lindsey?

Answer. No.

Bruce Lindsey?

Question. Bruce Lindsey.

Answer. No.

Question. After Mr. Hubbell had resigned from the Justice Department, did you have any knowledge about him taking any foreign trips or foreign travel?

Answer. No, I didn't.

Question. Were you in touch with Mr. Hubbell at any time after he left the Justice Department?

Answer. Yes.

Question. And do you recall on what occasions those were?

Answer. I wrote him a letter when he was in—when he went to prison.

Question. Just as a friend?

Answer. Yes.

Question. Okay. And did you—have you ever contacted him besides that, or did he write back?

Answer. He wrote me back.

Question. And I don't want to get into the real details of this, but can you generally discuss what you wrote?

Answer. I think I wrote that I was thinking of him and praying for him, and I believe he wrote back what he was reading and—what books he was reading, and I am not sure, did I give that letter to you?

Mr. DENNIS. I don't remember.

The WITNESS. Or Ken Starr or somebody. I no longer own my own letter from Webb.

Mr. DENNIS. Nothing related to this topic?

The WITNESS. No, not at all.

EXAMINATION BY MS. COMSTOCK:

Question. And did you have any other contact with him after that?

Answer. No.

Question. Was that then the last contact you had with him was him writing back?

Answer. I was afraid to.

Question. Were you aware of any legal defense funds set up from Mr. Hubbell?

Answer. No, I didn't think there was a legal defense fund set up for him. I thought there was a scholarship fund for his children.

Question. That is correct. I think there was some family trusts, separate trusts set up?

Answer. I heard about that, yes.

Question. Do you have any knowledge of any efforts of anyone in the White House to assist in raising money for those trusts?

Answer. No, I don't, not specifically anybody.

Question. Were you aware of Mr. Hubbell getting contracted to write a book while he was in jail?

Answer. I read about it. I think I read about it in Publishers Weekly.

Question. And were you ever aware of any discussions at the White House about what Mr. Hubbell was writing about in his book?

Answer. No.

Question. Any concerns ever expressed about that?

Answer. No.

Question. Why don't we move on to Mr. Chung. Could you tell us when you first met Johnny Chung?

Answer. Very soon after the election, I met him someplace in Washington, either at an event or he was introduced to me by someone, but I remember that it was very early after the election.

Question. Okay. Can you describe that meeting?

Answer. He told me he was very enthusiastic—he was a very enthusiastic gentleman. He told me that Mrs. Clinton had—this is total paraphrase—that Mrs. Clinton had made him a success in his business, that she was his inspiration, that she had given him advice that, you know, had more or less changed his life.

Question. And did he describe what that was?

Answer. I think she wrote him a letter, and I think she—he didn't say this, but I got the feeling he actually talked to her in Arkansas, and I don't know when he had talked to her, but, you know, prior to her becoming First Lady of the United States.

Question. Okay. Have you ever learned from any other source what that meeting involved or if that meeting occurred?

Answer. Well, at some point I talked to Mrs. Clinton, and I related the story of having met Johnny Chung and what he had said, and she said that she—once again paraphrasing—that she had remembered meeting him, was not aware that she had changed his life, remembered meeting him in Arkansas, remembered his energy, and remembered that he said that he was going—you know, that he was going to work really hard and make a success of himself and of his family, and that she had been encouraging, but she had not known that she had become such a figure in his life.

Question. All right. Do you recall if she said she met him in Arkansas?

Answer. Yes. As I said, I am paraphrasing, but it seems to me, as I remember, she met him—she met him in the Governor's Mansion, I think, in Arkansas. That is what I think it was.

Question. And how did Johnny Chung come to be at the Governor's Mansion in Arkansas?

Answer. I have no idea.

Question. So did the First Lady tell you he had been at the Governor's Mansion?

Answer. I believe that is what she said.

Question. And when you discussed this with the First Lady, did she—did she tell you, you know, anything about what he was in business doing or what?

Answer. No. In fact, she was trying to remember him, but she had remembered that there had been this Asian American man and that the name sounded very familiar to her, and I kind of told her the story, and it seems to me she tried to remember who he was, had a vague remembrance of him, and that pretty much was it.

Question. All right. Now do you recall in time, like when you—I know you don't recall exactly when you met Mr. Chung, but do you recall in relation to when you met Mr. Chung and when you had this conversation with the First Lady if that was fairly contemporaneous, like, I met a guy, you changed his life; or did that come up later after Johnny Chung had made visits or done whatever?

Answer. I think it was fairly contemporaneous because, as I said, for some reason, I am—one thing I feel very clear about is that I met him early in the administration, I just kind of remember meeting him early. And I believe the conversation was contemporaneous because it was kind of an interesting, you know, kind of an interesting tale to tell. I mean, you have a person who says, you changed my life. You say something about it maybe.

Question. Is there anything else about this first meeting you recall, if it was a large event or a small event?

Answer. I really don't remember, but I just remember the story, and kind of, you know, short, stout man who had some difficulty speaking English, but he was a character.

Question. I'm sorry, do you recall if this was or was not a fund-raising event that you met him at?

Answer. I really don't recall.

Question. Someplace in Washington, D.C.?

Answer. Yes.

Question. This is a document we received from the DNC, 1096988 through 89, which is a March 28, '94, Los Angeles Business Journal. And there is a feature article on Mr. Chung, which in the beginning describes him watching the election and I guess the debate between George Bush and Bill Clinton in '92, and that inspires him to go to Little Rock and I guess essentially knock on the door, where he met the First Lady.

Does that at all refresh your recollection of anything he told you or the First Lady might have told you?

Answer. Well, that gets to the mansion part. Yes, I—I really didn't remember that he was inspired to go to Arkansas because of the debates.

Question. And then—but when you had this meeting with him, he did say he had gotten a letter from the First Lady or something that inspires him to, or he had a discussion with her?

Answer. It seems like he had a discussion with her, and then I think there was a letter that came, or he had written to her, and then there was a letter that came back.

Question. Okay. Were you aware of this letter at the time when you discussed, you know, Mr. Chung?

Answer. No.

Ms. COMSTOCK. Why don't I make that article Deposition Exhibit No. 27.

[Williams Deposition Exhibit No. MW–27 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Then this is April 26, 1993, a letter to Johnny Chung from Hillary Rodham Clinton, with the White House stamp on it, which reads:

"Thank you for your letter and my apologies for not getting back to you sooner.

"It appears from the correspondence you have had with Federal and State officials, and the private sector, that you are already on the right track. Nevertheless, I wish you good luck with your innovative system."

Did you ever see this letter or know about this letter at all?

Answer. I have seen it in recent times. I mean, I don't remember seeing it in April of 1993.

Question. Okay. You have seen it at a recent deposition?

Answer. No, actually, before that. I don't know what the circumstances were, but I have seen this letter before.

Question. Do you know if it was in conjunction with compiling documents or trying to review any matters related to Johnny Chung within the White House?

Answer. Yes, it could have been. That may be, it could have been.

Question. Did anyone at the White House ask you to compile documents about Johnny Chung in particular?

Answer. I think at the point of some subpoena, yes.

Question. And do you recall who asked you to get some of those documents together?

Answer. No. I think it was probably written, and I don't know who I talked to.

Question. Did you talk with someone in the Counsel's Office about the various documents?

Answer. I don't really believe I had any documents.

Question. Or documents from the First Lady's Office?

Answer. They would have gone directly to correspondence people and people who keep her correspondence, but I do remember seeing this letter.

Question. Would that be Carolyn Huber who keeps the First Lady's correspondence?

Answer. It more probably would be Pam Cecetti, Pamela Cecetti.

Ms. COMSTOCK. I will make this Deposition Exhibit No. 28.

[Williams Deposition Exhibit No. MW–28 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Are you aware of Mr. Chung having offices in D.C. for his business?

Answer. No, I don't think I was.

Question. At any time did you learn of him having offices here in Washington?

Answer. No, I don't think I knew he had offices in Washington.

Question. And this is DNC 1786472 through 81, which is a DNC Presidential birthday celebration at the Sumner Wells estate, Fort Washington, Maryland. The cochair for the events are identified as—Johnny Chung is there with 10 guests, and then these records do identify you as attending as one of the VIPs on page 1786479.

Do you recall attending the President's '94 birthday celebration?

Answer. This is when—I just have to figure this out. Somebody really good was there. The long and short of it is I didn't get to go because I was in a deposition that night, so I didn't go. I think Patti LaBelle sang at that.

Question. Okay.

Answer. Right, Patti LaBelle.

Question. Good recall.

Answer. I remember that because I really wanted to go.

Question. I think the first WAVEs records that we have of Mr. Chung were in July of '94, and I will get you a set of those.

Mr. BALLEN. Can I take a minute break at this point?

[Brief recess.]

EXAMINATION BY MS. COMSTOCK:

Question. Back on the record here. We were just looking at the WAVEs of Johnny Chung, and actually, I misspoke. I think the first WAVE we have is February 2nd, '94. Do you have any recollection of—you say you recalled meeting Mr. Chung outside of the White House early on. Do you recall when you first had occasion to meet with him at the White House or see him at the White House?

Answer. I don't remember the first occasion. I don't remember the first time I saw him at the White House.

Question. Okay.

Answer. Although there was a first time, but I don't remember the date.

Question. Okay. Prior to the March 8th and March 9th events, which involved the $50,000 check in those events, do you recall having a meeting with him prior to that date?

Answer. Seeing him, yes.

Question. Do you recall him ever coming by your office?

Answer. Yes.

Question. Prior to that date?

Answer. Yes.

Question. And what would be those occasions when he would come by the office?

Answer. I don't think they were any particular occasions. I think he was just dropping by to say hello.

Question. And do you know why he was at the White House and dropping by?

Answer. Well, I don't know why he was dropping by. I mean, I had a sense why he was dropping by our office; he liked to come to our office because it was Mrs. Clinton's office.

Question. Were you aware of other people who he was stopping by and talking to?

Answer. I really didn't pay any attention to it.

Question. I am just going to keep the WAVEs as a reference point as we go through these other documents. This is an October 11, 1994, letter to Reta Lewis from Johnny Chung. It says Reta Lewis, special assistant in political affairs. Do you know Reta Lewis?

Answer. Yes, I do.

Question. In this letter, he talks about receiving a letter from the President, and says: "Due to my busy schedule, I was unable to meet with you during my last trip," and goes on to discuss processes setting up a Washington, D.C., office, "This will allow us to work closely together."

Did you ever have occasion to talk with Reta Lewis about any contact she had with Johnny Chung?

Answer. I think I once saw Reta with him. I don't think that we had a conversation about Johnny Chung but I once saw Reta with him, and—I once saw Reta with him in the hall.

Question. Just walking down the hall?

Answer. Yes, I am sure I stopped to talk and——

Question. This is at some point, obviously after you met Mr. Chung, you knew who he was, he knew who you were?

Answer. I can't say when exactly. I mean, I think he knew who I was. Just from our first meeting ever. So I would—this was definitely, I believe, after that because I believe I met him sometime in 1993, but I do remember seeing him with Reta.

Question. In the third paragraph, he says, I also want to inform you that I am arranging a meeting for Chairman Y.C. Wang with President Clinton. Chairman Wang will be arriving on the 15th of October and staying approximately 2 weeks. I am discussing with Mr. David Wilhem regarding the setup of this meeting.

Do you recall any efforts by Mr. Chung to get a meeting for Y.C. Wang with the President?

Answer. No.

Question. Okay. Around this time, around the fall of '94, do you remember any discussions with anybody in Political Affairs, Reta Lewis or anybody else, about Mr. Chung's contacts with the White House?

Answer. No.

Question. Okay.

Answer. No.

Question. And prior to the March 8th, 9th, events, do you have any recollection of discussing Mr. Chung with other people at the White House prior to that time?

Answer. No. I wasn't—it wasn't a focus of anything. I would see him around and he would definitely stop in to the office and sometimes I would see him there, and—but he wasn't the focus of anybody's conversation.

Question. And when he would stop by the office, what did he do when he stopped by the office?

Answer. Well, I actually was in my interoffice most of the time, but when I had seen him in the office, he would—we would change the pictures or put knew pictures up of Mrs. Clinton in her travels. They were all over the place. I mean, certainly not museum quality but there were loads and loads of pictures of her trips and her events and he would love to see the new pictures, and look at them and spend a great deal of time looking at them.

He would then sit in the foyer of the office and he would talk to Evan or talk to anyone who was out there. One time I heard him relating to some interns the story of meeting Mrs. Clinton, which I think he did quite a bit, and then he would—I believe that sometimes he waited for me to come out of my office so he could say hello to me or whatever. But he just liked coming there.

Question. Were you aware of him stopping by other offices, prior to like March 8th and 9th? Were you aware—do you know how he had gotten in there? I mean, did he sort of appear and you wondered how he got in here, who let him in?

Answer. I never thought about it.

Question. Were you aware of—did there come a time he was coming and asking your office to ask him to let him into the White House?

Answer. Oh, clearly, yes.

Question. And how did he go about doing that?

Answer. Generally, he would call Evan Ryan.

Question. And what did you tell Evan about him?

Answer. I said whenever Mr. Chung calls and he wants to come in, we should let him in and we should treat him well.

Question. And why is that?

Answer. Because he was a human being and we had a very, I think, was very focused on our office being available for people to come into, although I don't know at what point. I also knew he was a managing trustee at the DNC, so—but generally, every single person who came through that office, whether they were a contributor or not was to be accommodated, to be treated well, as well as people should bend over backwards and they should tolerate people. As a public office, we kept our office open, and if people got past the threshold of, say, the WAVE security and were not a security threat, it was in fact a building that belonged to people.

Question. Did you have a sense that Mr. Chung was coming in and sort of, you know, wandering around to see people, stopping in your office, he would get in and then kind of linger around?

Answer. To be quite frank with you, I never thought that much about Johnny Chung or what he was doing or was that concerned. If a person was not a security threat, I really wasn't focused on kind of what he did once he was there.

Ms. COMSTOCK. I would like to make this October 11, '94, letter deposition Exhibit No. 29.

[Williams Deposition Exhibit No. MW–29 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. In this October 11th letter he talks about getting, I guess, in the second to the last paragraph there, getting a political report card from the DNC on economic achievement and how he is going to broadly utilize this.

Did he ever have discussions about his interaction with the DNC or anything like that when he was in your office?

Answer. About his interactions with the DNC, in general, no.

Mr. DENNIS. I don't want to become witness in this, but I think it may be important for you to know Room 100 is on the first floor of the Old Executive Office Building. It is the only office that the door is constantly open and you can walk that whole hallway around and every door is shut, but that door is open, so that really people can just walk right in, unannounced, without any particular, you know, reservation or appointment or anything. It is set up more like a Congressman's or Senator's office would be, to accept people, constituent service, that sort of thing. So I wanted to give you the feel for why someone could just come in and lounge a little bit more than they might in one of the other offices.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall if Mr. Chung ever provided a reason when he wanted to come over, what he said he was doing?

Answer. Rarely. To my knowledge, no, but I generally was on the—not on the original request, and I mean, I generally would get Evan and volunteer someone, either yelling into the office or buzzing me or saying that Johnny Chung is outside the gates and he would like to come and stop in the First Lady's office, and I would say, let him in, clear him in.

Question. And do you recall if this was before or after the March 8 events or before—if you can place it in time.

Answer. I can't place it in time. I was somewhat interested when I talked to Ed——

Mr. DENNIS. Well, you can't describe that. Let me put on the record that she has of course reviewed the WAVE records and—what she is referring to is the fact it appears from the record we saw he was first WAVE'd in by her office around March 8 or March 9, and prior to that it seemed he was WAVE'd in by other offices, I am not sure if she was aware of that, other than prior to looking at the records themselves, but that is based on the records, not her recollection.

EXAMINATION BY MS. COMSTOCK:

Question. And then, actually, you know, given, I mean, the records do reflect the first time he was waved in by your office is March 9th, '95.

Do you have any knowledge of the people prior to that? You know, when he would come by to your office, did he mention a meeting with Brian Foucart or, you know, I came here for a Presidential event or something or anything like that?

Answer. I didn't really have conversations with Johnny. I mean, mostly, if he got me, it was because I was walking out the door and going some place and I would pass him by and, of course, I would say hello to him. But all of these offices, with the exception, obviously, of those in the West Wing, these OEOB offices are in very

close proximity to our office, the Foucart offices is right underneath us. Reta's office at this time was right on the same—down the corridor from us.

Question. That is Reta Lewis?

Answer. Reta Lewis.

Question. Which is reflected on Page 3 of the documents, says having WAVE'd him in on August 2nd, '94, which I believe is the day of the birthday events, also.

Mr. BALLEN. Just so the record is clear, the witness is reading from the WAVE record. When you are referring to other offices, these are ones you are referring to as you are reading them?

The WITNESS. Yes, that is correct. I'm sorry.

EXAMINATION BY MS. COMSTOCK:

Question. Maybe we can go through them and identify some of the offices he had been visiting up to that time. You have Mr. Foucart. Do you have any knowledge of Mr. Foucart talking to Mr. Chung?

Answer. No.

Question. Just tell us generally who Mr. Foucart was and what he did at that time?

Answer. Boy, what did he do at that time. For some reason, I think he was in administration at that point in time. The office right below us is one of the administrative offices for the building.

Question. Do you know if he ever asked anyone in the administration office about using his blast fax capability, if he talked to anyone at the White House about that?

Answer. Oh, yes. I don't know who he talked to, but I remember seeing him with Reta Lewis, and her describing his work as blast faxing.

Question. So your recollection of Reta Lewis having at least—you got the impression she discussed his blast fax with her?

Answer. Yes.

Question. And do you know—I guess the second page, EOP 7800, 7–22–94 meeting——

Answer. I am not with you on this. Wait a minute, 8663.

Question. 8708 on top.

Answer. Oh, wait, I have a couple. Is this it?

Question. Yes.

Answer. Okay.

Question. The second page in that grouping, which is 8700. Do you know who Anderson is—I'm sorry. You must have a bad copy. I will give you this one instead. That one was missing that one page. That is what happened.

Answer. Okay.

Question. Do you know an Anderson that was in Room 1 something, 115, or something like that?

Answer. No.

Question. Then it referred to Lewis. Is it Lewis here on the third page at 8–29–94, Room 474? Would that have been Reta Lewis? She was on the fourth floor at that time?

Answer. She is in the political office. Maybe her office, but the main political office was on the first floor, down the hall from us, if that is the Lewis.

Question. Okay. And then the third entry there, it says visitee is POTUS, on the South Lawn, presumably an event, and Dickey is the person who requested it.

Were you aware of any requests by somebody in the social office to get Mr. Chung in?

Answer. It looks like—I mean, I don't know, but based on this event in time, there was probably an event on the South Lawn and Robin Dickey cleared huge numbers of people.

Question. Did you ever have any conversation with Robin Dickey? Did she tell you anything about Mr. Chung trying to get into the White House or White House events?

Answer. No.

Mr. BALLEN. Can we ask the question whether the witness is aware if any other offices scheduled meetings?

Ms. COMSTOCK. I am asking her some of these people, if she might know who they are. As we are reviewing this, she discussed Miss Lewis. I am trying to identify some of the other people who Mr. Chung may have been visiting at the White House.

EXAMINATION BY MS. COMSTOCK:

Question. Do you know someone named Atta?

Answer. No.

Question. Then on the next page, which is 8–7, it is hard to read it, if that is 88 or 38, the second entry there is Quinn, requested by Kelly.

Do you know of him ever meeting Jack Quinn?

Answer. I don't know.

Question. Okay. And then down at the bottom of the page is 9–26 entry, the visitee is Kristoff. Kristoff is the NSC office.

Do you recall if Mr. Chung ever, just a meeting, Sandra Kristoff?

Answer. I don't even know Sandra Kristoff. I don't know.

Mr. BALLEN. Counsel, which entry are you referring to?

Ms. COMSTOCK. The second to the last on the bottom.

Mr. BALLEN. EOP 003738, that says John Huang visit.

Ms. COMSTOCK. I'm sorry. I am looking at the wrong one. These are mixed in here. I want to correct that for the record. That was not Johnny Chung visiting Kristoff.

EXAMINATION BY MS. COMSTOCK:

Question. Okay. The next page, John Chung, if that is the same one, is meeting with someone named S-H-A-K-O-W, Shakow.

Answer. I don't know who that person is.

Question. And the ones on the bottom.

And then the next page is 5041, is a meeting with somebody named E-D-E-R, who waved him in.

Answer. I don't know who that is, either.

Question. Next entry there on the next page is W-O-Z-N-I-A-K, WAVE'd him in and the visitee was Mitchell. Do you know who that is?

Answer. Not that I know.

Question. And then the last page of this group, which is 5040, somebody Don, is that, who WAVE'd him in?

Answer. It looks like Don over here, too. I don't know who that is.

Question. Okay. Then there is a Brown in the next entry. The next entry does say Jonathan Chung. I am presuming that that is a mistake there.

Answer. I'm sorry, I don't——

Question. Next is 12–20–94, POTUS event, and the residents, do you recall generally if Christmas time of '94, or thereabouts, if Mr. Chung had been at any Christmas events at the White House or ever told you about anything like that?

Answer. No, but it wouldn't surprise me. Those are huge, huge things.

Question. I think there is going to be a lot of similar names here. Don. Middleton. He has requested him in on January 1st, '95.

Do you know who Frank Footer is, January 10, '95?

Answer. I don't know that, no.

Mr. BALLEN. Maybe it would be better to ask the witness.

Ms. COMSTOCK. Yes, see if you recognize any on that page.

The WITNESS. Bailey.

EXAMINATION BY MS. COMSTOCK:

Question. Brian Bailey?

Answer. Brian Bailey.

Question. And deputy chief of staff office?

Answer. Yes, that is right.

Question. Okay. Which says, and this is getting us into the March 8 day so we might as well go into that area now.

Could you just describe, to the best of your recollection, the events leading up to the receipt of Mr. Chung bringing the $50,000 check to the White House?

Answer. Yes. I think one of the things that Mr. Chung often asked me when he would make his visit would be how can I give to the First Lady, and how can I help her, how can I give to the First Lady, I can give to the First Lady. And a number of occasions I had suggested to him that instead he give to the DNC, that he could not give money to the First Lady, he could not give money to the White House, but he could give money to the DNC. I don't recall if I have told him that he could give money to the legal defense fund, but those were the—whenever anyone asked me where they could give money, I would say, you need to contact the DNC, the President's legal defense fund, and I think at some point when the campaign started, I would say Clinton/Gore.

So he asked me, I do not know the dates of this, because I see them actually all as kind of separate, separate occasions, but at some point in time, I was, I believe, leaving the office and coming out into the vestibule, at which point Mr. Chung en-

thusiastically said, I give to the First Lady, I give to the First Lady. I said something to the effect of, Johnny, I have told you that you cannot give money to the First Lady, you can give to the DNC, and I believe I told him that again and he said, I am giving to the DNC, I am giving through you, I give through you, I give through the First Lady's office. I told him again that he should just give it to the DNC. He continued to be somewhat insistent. I wanted out. I said, you know, I will take it, I will give it to the DNC, and I think our encounter was, I don't even know if it was a minute or a minute and a half.

Question. And that is all you recall about that?

Answer. That is all I recall about that actual check giving.

Question. Do you recall the events leading up to that or Mr. Chung wanting to get his friends into the White House, visitors visiting from China that he wanted to have?

Answer. Well, let me tell you what I remember. I don't remember him wanting to get his friends into the White House on that particular day. As I said, I see these all as separate incidents, even though the paper now reports them as all together. I know at some point in time I was asked probably by Evan to arrange a photo for Mr. Chung, or if she could, and I said, yes, that she should, and I also remember on a couple of different occasions, where Mr. Chung had asked to go to the White House Mess, and Evan had asked me, and I had said, yes, accommodate him, use my Mess account.

Question. So Mr. Chung had used your Mess account?

Answer. Yes.

Question. Prior to the time when you received this check from him?

Answer. Yes, I believe so, yes.

Question. And he had brought friends with him to visit the White House?

Answer. I don't know who he brought with him, but I know that I had okayed him using my Mess account.

Question. Do you know generally when?

Answer. No.

Question. Have you been able to review any documents from your mess—from mess records or any accounts or anything like that?

Answer. Well, those that I still have, but I can't—I mean, I just don't know. But I do know that there was—at some point before that he'd used my White House mess account.

Question. And on the mess account you got the bill either every other week or——

Answer. Every month or something.

Question. Do you know who sent that bill out?

Answer. The White House Mess.

Question. Does that come out of Gary Walter's office or is that separate?

Answer. No, that's a whole other—different.

Question. Somebody sets that up and sends it out?

Answer. Yes, it is totally different.

Question. And you have maintained those records or you have some of them? You don't know what you have? Or——

Answer. No, I mean, I pretty much—I mean, once I paid them, I never thought about them again.

Question. But prior to this telling Mr. Chung, presented you with a check, he had—your recollection is that he had used your mess account for whatever reason?

Answer. Yes.

Question. And you did not—were you aware of who he brought into the White House with him?

Answer. No. I do remember—just another in the series of kind of events is that I do remember at one point bowing to a group of people who could not speak English, and I could not speak Chinese, and I remember them being out in a hall. I don't know the time, but they were with Mr. Chung, and he presented them to me and me to them, and we all bowed. And I do remember that because it stood out in my mind as——

Question. Uh-huh. Okay. And, again, can you place that in time before or after that check or contemporaneously or if his friends were with him on that day?

Answer. I really don't know. I mean, I just kind of all—I mean, I all saw them as separate events.

Question. Okay. Well, leading up to the time when he——

This is a document from DNC 3233326, February 27th, 1995, letter to Richard Sullivan from Johnny Chung. Have you seen this before?

Answer. No, I have not.

Question. Okay. In this later he's requesting that Mr. Sullivan—he tells him he's bringing a delegation from China and, as I have mentioned on the phone, their main

purpose will be as follows: One, meet President Clinton; two, meet Vice President Gore; three, have lunch at the mess; four, tour the White House; five, meet Secretary Ron Brown.

Were you aware of any such requests coming from anyone at the DNC offices leading up to the March 8th and 9th—actually, can you place in time—if we could go back to—you're saying you remember him, Mr. Chung, being there one day and wanting to give you a check.

Answer. Uh-huh.

Question. Do you have a general recollection of when it is? Do you have a date or time frame?

Answer. Only what I've, you know, read. I really don't—I really don't have a sense of the time. I mean, I know there was a time that he gave me a check. I know that there was a point in time that I bowed to him and Chinese people. I know there was a point in time that—that someone asked me, I believe Evelyn, to get a picture. And I also—my recollection is that he had gone to the mess on my account at another time or at least one other time or two other times. But that wasn't the first time I'd heard about Johnny Chung wanting to use the mess.

Question. Okay. And do you recall, leading up to him coming in and wanting to give the check, did he—had Ms. Ryan asked you, you know, anything about him being able to get access to the mess privileges or if he could get a picture with the First Lady or the President or anything like that? Or any of these items—tour the White House or anything like that?

Answer. Well, I—I mean prior to him bringing that check, it seems to me that we would have accommodated him and probably had at the mess or if he'd asked for a tour of the White House or that he'd had other pictures. So that with the exception of probably, on this list, meeting the President—I don't know if he met Al Gore or if he met Secretary Brown. I mean, seems to me that prior to 1995, Johnny Chung had pretty much done all of this anyway, at least a couple of times. I mean, that was my—my recollection.

Question. Okay. Did you ever see any—the names that are attached here to the delegation or any descriptions of these people? Did anybody ever provide with you any information like that?

Answer. I don't remember seeing—I mean, I don't know if I saw these names in a newspaper or whatever. For some reason, I think I know the people who came. I mean, maybe it's because they gave me card when they bowed, because they did give me a card. So seems like I remember this Sun guy was in the delegation. He seemed really young. I mean, but I don't—I don't remember getting this list of these people.

Question. Prior to getting the check from Mr. Chung, do you recall any conversations with Ryan about the day—about a particular day or the day before or close in time to when you got the money—of Evan Ryan telling you anything about this delegation that he wanted to bring and how big at the White House?

Answer. I don't remember—like I said, I don't remember the delegation. And, once again, I don't see these all as events.

I do remember that Evan would ask me about clearing in Johnny Chung. I have a recollection that Evan asked me about using the mess account, I think on more than one occasion, for Johnny Chung. And I do have a recollection that Evan, at one point, asked me about a picture with Mrs. Clinton for Johnny Chung.

I remember all of those things. I don't see them as occurring all at once; and some, I think, happened prior to the time that he brought the check.

Mr. BALLEN. Can I ask you so it is clear, you said he brought the check. Did he give you an envelope? Did he give you a check? Did he say what was inside? Did you see what was inside?

The WITNESS. I knew that when he handed it to me it was a check. I don't know if it was in an envelope or whatever.

Mr. BALLEN. How did you know it was a check?

The WITNESS. Because he kept saying—he had something in his hand. He said, I give to the—I give to Mrs. Clinton. I give to Mrs. Clinton. And it was the first time he ever had anything in his hand. He was always saying, I want to give. I give to Mrs. Clinton. I give to Mrs. Clinton.

And then I said—I mean, I had a realization at some point it was a check because I said, you cannot give to Mrs. Clinton, at which point he said, I'm giving to the DNC. I gives—I remember this. It was such an awkward construction—I give through you. I give through the First Lady's office.

And, you know, and at that point I just—I mean, you know, that it was a check for the DNC, that he had somehow—I don't remember his exact words, but he had somehow made clear to me that it was a check for the DNC; and, at that point, I thought, okay, I'll give it to the DNC.

Mr. BALLEN. Did you look at it or open it?

The WITNESS. It's funny. I think that I—I don't remember looking at it, but I had a sense that it was a $10,000 check. But I don't know why I had the sense, but I thought for some reason it was a $10,000 check. I—I was surprised to learn it was $50,000, which I learned kind of around a news inquiry much later.

EXAMINATION BY MS. COMSTOCK:

Question. But that's the first time you learned how much money was in it?

Answer. Right, uh-huh.

Question. And what did you do with the check after you received it?

Answer. I think I just put it in my basket, in my out basket, as I had done with—you know, we would get checks that came in the mail that would be, you know, for Clinton-Gore, for something that didn't belong. It would come in the mail addressed to Mrs. Clinton. I would just put them in the basket; and I assumed that Evan or, you know, whoever, whoever took out my basket of things would get the check to wherever it needed to go.

Question. It was a basket that was designed for things to go to the DNC?

Answer. No, it was my out basket.

Question. And it was in an envelope at that point?

Answer. I really don't remember if it was.

Question. That's the last—you put it in your basket, and that's the last you saw of it?

Answer. I never thought about it again.

Question. And nobody asked you, what am I supposed to do with this?

Answer. Well, we had received other checks through the mail. Not just for the DNC. There would be checks that would come saying we need to pay off the—take this check and pay off the deficit or give this check to Mrs. Clinton. I want her to have it to do—I would put—if they got to me, and some did, I would put them, just as a matter of routine, in my basket. And Evan or someone would either send it, if it was for the DNC, send it back to correspondence if the check had to be returned to someone who was trying to give a check to Mrs. Clinton.

So that—or you got checks that were made out to the Treasurer, and they wanted Mrs. Clinton to give it for the reduction of the deficit. We would send it over to the U.S. Treasurer.

So that checks that had come before, I would just put them in the basket and, you know, just assume they would get to the right place.

Question. Was this—you had said that, you know, that he said, I want to give to the First Lady. Was this the first time he had said that kind of thing?

Answer. No, well, no, every time I saw him. Every time I had a chance encounter with him, he wanted to give to the First Lady.

Question. Did you ever mention anything to him about any bills from—regarding Christmas parties?

Answer. No, I don't recall that.

Question. Do you have any knowledge of anybody in the office—in your office or anyone at the White House ever mentioning anything about DNC bills for Christmas parties?

Answer. To him?

Question. To Mr. Chung.

Answer. No, not that I'm aware of.

Question. Previously, we have been looking at Mr. Middleton's WAVEs records. It appeared you know, when he came into the mess that he had been WAVE'd in by someone from your office, that Mr. Chung was not WAVE'd in by anybody from your office prior to March 9th. Do you know how, if he had used the mess privileges prior to this time, how that came about? If it was done through your office or if it was coordinated with somebody else?

Answer. I don't. I don't know. I mean, that's—I indicated I was surprised this was the first time that we had waved in him, since I'd seen him so often before in the White House.

Question. You have specific recollections that you had seen him—that you thought—that he had been in there in your office prior to March 8th?

Answer. Uh-huh.

Question. This wasn't the——

Answer. The first time that Johnny Chung had ever been in our office? No, no.

Question. And did you ever have—as you turn to the Sullivan letter from Mr. Chung, you never had any contact with anyone from the DNC about Johnny Chung?

Answer. No.

Question. At any time?

Answer. No.

Ms. COMSTOCK. We'll make this letter Deposition Exhibit No. 30.

[Williams Deposition Exhibit No. MW–30 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. This is a February 28th, 1995, letter—I'm sorry. The Bates Stamp Number is JCH 15011; and the previous one, the Bates Stamp Number was DNC 3233326.

This letter was to Ann McCoy; said, I would like to request your assistance again. I am bringing with me the delegation from China. This is a group of very important and powerful business leaders from China. They will be in D.C. from March 7th to 11th, and as usual, please arrange for a tour of the White House.

Do you have any knowledge of Ann McCoy assisting Mr. Chung?

Answer. Yes. Worked in the visitor's office, and she often gave tours to family or, you know, anyone who had missed the tour had to come in the day or whatever, so she was always giving tours.

Mr. DENNIS. Do you recall this specific——

The WITNESS. This letter? No. Oh, no, I've never seen that letter before, but I know Ann McCoy.

Mr. BALLEN. Or that she had given Johnny Chung a tour—that was the question.

The WITNESS. Yeah, I think I do recall Ann giving Johnny Chung a tour.

EXAMINATION BY MS. COMSTOCK:

Question. And how do you recall that?

Answer. For some reason I think that she had—she told me that. Or asked me if I knew a Mr. Chung or did I know about him. I—I'm pretty sure I had a conversation with her, and she had given him a tour or maybe more than once, even.

Question. And what had she told you about him?

Answer. Oh, kind of just that he was a funny sort of man, but, you know, loved walking around the White House, and asked me if I knew him, and I said, yes, that I knew him, and I thought he was a good guy.

Question. Okay. Ann McCoy—the document we have been discussing earlier today, May 5th, 1994, list which had listed various perks.

The WITNESS. I think this is what you——

EXAMINATION BY MS. COMSTOCK:

Question. Yeah, I'm sorry. I was thinking of Ann Stock on here, because Ann McCoy's name is not on here. I wonder, do you know what—that was just her—she would arrange for the visitors?

Answer. Yeah, the visitors office.

Question. Basic tours?

Answer. Not just basics.

Question. This was a different tour than the people—this is the tour that you—go-to-the-head-of-the-line kind of tour, see a little bit more?

Answer. Yeah, there's at least seven or eight different formulations of tours, and the Ann McCoy kind of walk-around is one of them.

Question. And now, in some of the news accounts have shown, you know, Mr. Chung sort of all over the White House. Do you know who was bringing him all over the White House in different hallways and in the mess and in the kitchen or wherever?

Answer. In the kitchen?

Question. I don't think he was in the kitchen, I think it was in the mess, but he was in a lot of different spots. Were those photographers going around on the tour with him? Do you know if he had his own photographer with him as he went on the tour and took those pictures? Can you do that?

Answer. I'd have to see the pictures. The only picture that I've seen in the press is a Christmas picture. And if it's in the hallway it more than likely is part of a large receiving line, because that's how they're generally done. So if it is in a hallway or in a room in front of a picture or a tree or something like that, it's probably a receiving line.

Question. Okay. Then this February 28th letter continues, "I have asked Mr. Richard Sullivan, Mr. Eric"—small "L" there "led"—I don't know if that's correct—"of DNC and Mr. Mark Middleton to assist me in arranging a meeting with President Clinton, Vice President Al Gore, and a lunch at the Mess in the White House."

Do you have a recollection of Mark Middleton assisting Johnny Chung at the White House?

Answer. No. No, I didn't know he knew him.

Question. You had no knowledge of Mr. Middleton knowing Johnny Chung?

Answer. No.

Question. Are you sure then that Mr. Middleton didn't ask you to ask help Mr. Chung in any way?

Answer. Oh, no. Mr. Middleton wouldn't have to ask me to help Mr. Chung. I mean, I would have helped Mr. Chung on my own.

Question. I mean, Mr. Middleton never asked you or said——

Answer. No.

Question [continuing]. Johnny Chung called me up?

Answer. No.

Question. February 28th, '95, I believe Mr. Middleton had left the White House at this point?

Answer. No.

Question. Did he ever call you up and say, hey, Johnny Chung is asking me to get him into the mess——

Answer. No.

Question [continuing]. Can he go on your account since I'm not there anymore?

Answer. No, no.

Question. Nothing like that?

Answer. No. Huh-uh.

Question. And do you have any knowledge of—this time frame that he's working on was the March 7th to March 11th time frame when Mr. Chung is writing to Ann McCoy asking for assistance?

Answer. Uh-huh.

Question. But it was the time frame when he ends up arriving at the White House with the $50,000 check——

Answer. Uh-huh.

Question [continuing]. And—and then also having lunch at the mess with his five friends from China.

So do you know how he ended up asking Ms. McCoy about help with this to coming to your office? What happened in the interim, if you have any knowledge?

Answer. No, I mean, what happened in the interim—which interim?

Question. Well, he's asking here Ms. McCoy whether or not she can assist with lunch in the mess.

Answer. Uh-huh.

Question. And then, later in March, he is asking your office to help him with that.

Answer. Oh, no, I wasn't aware that he had asked Ann McCoy.

Question. Do you know if he was turned away or, sorry, we'll give you the tour, but that's the best we can do?

Answer. No, I don't know. Huh-uh.

Question. Now, just so I can get this clear, you say you recall these as separate events so you don't recall him in this time frame. Do you recall him in this time frame, when he gave you the check, having his friends there to go to lunch or for a picture or for any event contacted with his friends?

Answer. See I saw them all as separate events in my head. I see them all, each, as separate. I didn't put them all together. I saw the check as a separate thing that happened. I remember meeting his friends, but I did not tie them together. I just remember them as individual events. It may or may not be that, but that's the way I remember them.

Question. Do you have any recollection of Evan Ryan discussing with you anything about that he wanted this group to be able to come to the mess and get their picture with the First Lady and all, and he wanted to know what he could do to help the White House or anything like that?

Answer. No, I mean—as I said before, I recall that if there was a time that Mr. Chung made a request, he would make it to Evan, and she would ask me about it. I know that she asked me about getting him in the mess and getting a picture with Mrs. Clinton, both of which, you know, I tried to accommodate. But not in relationship to his check or contribution. I mean, he'd been in lots of times before. He had lots of pictures before; and he was already a managing trustee, which meant he was a contributor.

Question. And you had recalled the time before when he had come in and used your mess privileges before. Did he pay you back or——

Answer. No, I don't—I don't recall him—you mean pay me back for the mess?

Question. Yes.

Answer. Like I said before, I never thought about it. I don't recall him paying me back, no. Like I said, unless Evan got a check from him, he didn't pay me back.

Question. Do you recall ever saying anything to Evan Ryan about the check from Mr. Chung in any way going towards the DNC Christmas party debts?

Answer. No, I don't.

Question. Do you have any recollection of saying to anyone in your office anything about what Mr. Chung's money would be used for?

Answer. No.

Question. Did you have any idea in your mind what the money that he'd donated would be designated to or for?

Answer. I would have no way of knowing. I mean, there would be no way of designating money at the DNC.

Ms. COMSTOCK. We will mark this February 28 Ann McCoy letter, JCH15011, Deposition Exhibit No. 31.

[Williams Deposition Exhibit No. MW–31 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Okay. Have you talked with Ms. Ryan about her recollection of these events?

Answer. No, I have not.

Question. Has anyone described to you in any way her recollection of these events? Has anyone else told you what her recollection of the events is?

Mr. DENNIS. Ms. Williams has had discussions with me, but those discussion——

EXAMINATION BY MS. COMSTOCK:

Question. Aside from your attorneys?

Answer. No.

Question. Aside from you remember bowing to a group of people that Mr. Chung was with, was that only on one occasion that you recall him welcome a group of people?

Answer. Uh-huh.

Question. You saw them out in the hall somewhere?

Answer. Yes, near my office.

Question. Did you have an understanding of what they were doing there at that time?

Answer. No, I just thought they were exactly as he described them, friends of Mr. Chung.

Question. And did he tell you that they were friends, business associates from China?

Answer. Yes, he told me they were from China. That's right.

Question. And they couldn't speak English?

Answer. Right.

Question. Did you have an understanding that they were foreign friends?

Answer. That was my understanding, yes.

Question. And did you have an understanding that they were at lunch at the mess that day that you saw them—or had been?

Answer. I don't know if I thought anything about what they were doing. I just think I—I mean, I just think I saw them in the hall, saw Johnny Chung, bowed and went wherever I was on my way to.

Question. And when is the next time you recall having any interaction with Mr. Chung after you got the—actually, can you place the time where this bowing and meeting his friends, whether it was before or after the receiving the check?

Answer. I just don't—I don't know.

Question. And do you have any knowledge about them having a picture taken with the First Lady, that group of people that you thought couldn't speak English?

Answer. I don't know. Like I said, I know that I arranged for a picture with Mr. Chung. I don't know who he took with him, if anyone.

Question. Can you place in time when you arranged this picture in terms of just in relation to when you received money from Mr. Chung?

Answer. No, I'm sorry.

Question. Would you know if it is a year apart or——

Answer. Oh, I just don't—I just don't know in time. I mean, there's so many—there's so many pictures I've arranged for so many, I just could not—I can't place it.

Question. To your knowledge, Mr. Chung then did have somebody who—he had his picture taken with the First Lady and then whoever else was with him. You just know about him having his picture taken; is that right?

Answer. I was asked to arrange a picture for Johnny Chung. I believe that's what Evan asked me, and I said arrange it.

Question. Was it your understanding that Evan then arranged the picture?

Answer. That would generally be my understanding, that Evan would arrange it.

Question. And then—did you learn then that that did occur then? That they went ahead and arranged——

Answer. Probably never thought about it again.

Question. And then did you ever have an occasion to have Mr. Chung call and ask for his pictures from the First Lady or anything?

Answer. I don't believe he called and asked for his pictures from the First Lady. I think he probably would have called Evan for his pictures with the First Lady. I think the way the photographers may do it is that they take a card after they take the picture and mark the date and then send them out. I don't know quite—or send them to our office, one of our offices, saying, you know, attached to the card and we might send it out. I don't know how he got his pictures with the First Lady.

Question. Do you know if there was ever any issues about don't send the pictures out with the First Lady and Mr. Chung's friends if there had ever been an issue of the pictures that she had taken with Mr. Chung's friends?

Answer. No, I believe that there was, as I learned in my deposition, that there was an issue about sending Mr. Chung's picture with the President out, I think.

Question. Okay. But in regards to the First Lady, have you ever—was there ever any discussion about that?

Answer. I don't believe so, no.

Question. Is that a process that ever happens in the First Lady's office, don't send——

Answer. Rarely. Rarely. I mean I can't think of an occasion. Unless she looks really awful in the picture, I can't think of why really we wouldn't send a picture to people who had had them taken.

Question. Or if you find out after the fact that it's Jorge Cabrerra, that's a drug dealer, with you and somebody says don't send that picture out, we didn't know he was a drug dealer when he came in?

Answer. That would be a determination that we would make, but I can't imagine that we would have made that determination with Mr. Chung, he had had so many pictures before.

Mr. DENNIS. And that's with the understanding that this all is hypothetical, right?

Ms. COMSTOCK. Right. I think Mr. Cabrerra had his picture taken with someone, but I have no idea. I think it was the Vice President. I don't know if he had a First Lady picture. I'm just generally talking about—putting that in a hypothetical.

The WITNESS. I understand.

EXAMINATION BY MS. COMSTOCK:

Question. These are the copies of pictures that we received from the White House with the——

Answer. With the people who——

Question [continuing]. The people who Mr. Chung brought to the White House on March 9th. And I will note for the record there aren't any dates on these pictures. But generally these are the ones, the names. And the names that are on these pictures, a number of them coincide with the people he had listed on his name list of delegation in the February 27th, '95 letter that he had sent.

I am not good at pronouncing these names. I just notice the first name on the name list of delegation on DNC 3233327 is the name of the person in the picture that's reflected on EOP 029612. And——

Mr. BALLEN. Is there a question for the witness about this?

EXAMINATION BY MS. COMSTOCK:

Question. Well, I just wanted to sort of establish that these were the same people, so I'm not asking you in a vacuum. I think Wang Ren-Zhong, who is the last picture in this group, EOP 129165 is represented as number 4 here on his name list of delegation. The third picture, Huang Jichun, J-I-C-H-U-N, is also on the list as number 3 on the name list of delegation, and then there's a second page, EOP 029613 has a Yan Sanzhong, and I don't know if that—I don't see that exact spelling there. I don't know if that is any different spelling on one of these names on here. They often have different—sometimes there's different spellings, like when we talked about Mr. Ng Lap Seng before, he goes by Mr. Wu also.

But three of the names do line up with the people that he had wanted to bring. And I was wondering if that refreshes your recollection in terms of in connection with this donation and giving to him, you know telling you about his friends that he wanted to bring and who they were, and you know, why they wanted to have their picture with the First Lady, if that helps you in being able to place these things in time at all?

Answer. No, in my mind, the check that he gave had nothing to do with the picture or the mess or the tour, because we had a history of doing these things for him anyway.

Question. So there were from previous events he had had pictures at Christmas events and things of that sort?

Answer. He'd had tours, he'd eaten in the mess. I mean, there—and they seem unrelated to it.

Ms. COMSTOCK. I'd like to make these pictures Deposition Exhibit Number 32.

[Williams Deposition Exhibit No. MW–32 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Did Mr. Chung ever invite you or anyone else in the White House to your knowledge on any trips to China?

Answer. Invite us to China? He was always inviting us to China.

Question. And what did he——

Answer. Just, come, I will show you China.

Question. Did he ask you, if he was able to take you on trips or take you—take people from the White House, pay for their trips to China or do anything like that?

Answer. No, huh-uh.

Question. Was he ever giving you any gifts or providing any things for you to your office?

Answer. He brought to our office three sweaters.

Question. And who were those for?

Answer. The President, Mrs. Clinton, Chelsea and I think he brought a sweater for me. But we did what we normally do, just turned it all over to the gift unit.

Question. Okay. I will show the witness EOP 63825. And directing your attention to 63829 in this grouping.

Answer. 63——

Question. 829. Would these be the—these reflect—63831 and 32 reflect donor information with a gift intended for the President from Johnny Chung and the First Lady from Johnny Chung, and the date is March 9th, 1995, the same day reportedly the check was provided?

Answer. Uh-huh.

Question. Do you recall him giving you the sweaters and the check at the same time?

Answer. No, no.

Question. And this indicates that these sweaters were handed to Margaret Williams?

Answer. No, I remember that.

Question. You remember the sweaters?

Answer. I do remember the sweaters.

Question. But you don't remember the sweaters occurring on the same day as the check?

Answer. No.

Question. Okay. And then could you just describe the process that you go through on the gifts? That is reflected here in this group of documents?

Answer. I would hand them to Evan and she or an intern or a volunteer would fill out a gift form. There's a gift form that offices have. And then they would send it up to the—or wherever it is, the White House gift unit. The White House gift unit would then take them and send out a thank you note. And then they—I don't know quite how they do it, but they dispose of the gifts in some way. I don't know what they do with them.

Question. Okay. And do you know what you did with your sweater?

Answer. No, I gave—everything I had I gave to them. Even staff. Staff gifts——

Question. We didn't—these are part of the documents we just received last night, so the only two we have or have been able to locate, and since we haven't—we've only had them since last night we got this donor information for the President and the First Lady?

Answer. We received one for Chelsea.

Question. And then one for you?

Answer. Yeah, I'm pretty sure that was it. But even staff gifts go straight to the gift unit.

Question. Okay.

Question. And then the 63829 document, which has a thank you note to Mr. Chung, do you know whose handwriting is reflected on that?

Answer. No, but it looks like it says gift unit draft. It's whoever works in the gift unit.

Question. So they would just write the thank you letters?

Answer. They would take care of the letter and everything, yeah.

Question. And would those be signed by the President then?

Answer. Well, yeah, this—this reads gift unit draft of Bill Clinton letter.

Question. Okay. And so——

Answer. Uh-huh.

Question [continuing]. Do you know if you wrote any note to Mr. Chung after receiving the sweater?

Answer. No, no, I didn't. They handle all of this.

Mr. BALLEN. When you say signed by the President, would it be signed by an auto pen?

The WITNESS. Auto pen.

Mr. BALLEN. It's not something that the President would sign personally?

The WITNESS. No, auto pen.

EXAMINATION BY MS. COMSTOCK:

Question. EOP 063828, the page before that, is the letter that goes out to Mr. Chung from the President signed by the auto pen or however?

Answer. Right.

Question. And then there's a cc on here. Is that you got cc'd on these so that you knew? Is that the process?

Answer. Right. It's just that if they were handed to me, or whomever, they would cc, so that you knew that the—a letter had gone out.

Question. Okay. And then the page previous to that, EOP 63827, a March 12th, '95, there's gift of a large heart-shaped piece of jade with stand, which apparently was presented during the radio address. Did you learn about that?

Answer. No, I wasn't there.

Question. And do you know any of the handwriting on this sheet or is this from the gift office?

Answer. This looks just like the gift register.

Question. None of that handwriting is anybody from your office that you know of?

Answer. Huh-uh.

Question. Okay. And the first page of this EOP 63825. It says per Betty. Do you know, there's a Betty Currie in the President's office. Do you know was she the person who would ordinarily handle sort of these gifts if they were presented directly to the President?

Answer. Yeah, I imagine so. I mean I don't know. She's in that office though. I don't know if she has assigned any work.

Question. Do you know whose handwriting this is on this note?

Answer. No.

Question. It indicates Johnny Chung's friends presented this on his behalf when they visited with the radio address. And it says they don't know the friends' names?

Answer. Right.

Question. Did anyone ever come back to you after the radio address and say who were those guys with the President, we need to write a letter and find out who they are?

Answer. No, no.

Ms. COMSTOCK. We'll make that Deposition Exhibit Number 33.

[Williams Deposition Exhibit No. MW–33 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Now, you had indicated the letter—the pictures with the First Lady that we reviewed, those generally would just go out when they came back in and you had no knowledge of in this case them being held up in any way or any issues that arose about them?

Answer. The only—as I said before, the only issue I think there was was about the President's pictures with them at the radio address.

Question. And your testimony is that you only learned of that in the press accounts this year or did you—at the time did you learn that there were any issues with the NSC holding up pictures with the President?

Answer. Yeah, yeah, I think I knew about it at the time.

Question. Oh, could you tell us about that?

Answer. Just that I—just that I knew about it. I mean, I couldn't be helpful. I only knew that they were held up. Somebody called me from the NSC.

Question. And what did they ask you about?

Answer. I don't know if someone called me or I called somebody. Think Johnny Chung asked me to get—he hadn't received pictures from the radio address that he had attended.

Question. Okay. What did he tell about that?

Answer. I don't know. Just that he hadn't gotten them.

Question. Did he tell you who—you know, who had——

Answer. I don't remember.

Question. Did he just complain, you know, where are my pictures?

Answer. Yeah, pretty standard.

Question. Were you aware of him calling the office and asking for the pictures?

Answer. I don't know. For some reason I have a sense that he—I mean there's something about him not getting his pictures, the pictures from the President.

Question. And you remember personally talking with him about that?

Answer. I don't know if a person talked to him about it.

Question. No, do you remember talking to him about the pictures?

Answer. I don't know if I talked to him about it or someone told me about it. I mean, I could have talked to him, I don't know.

Question. This is some phone messages from April of '95. The first one is April 3rd to Evan from Johnny Chung. It says re: pictures?

Answer. Uh-huh. Excuse me.

Question. Actually he called for Gina, who wasn't here, and then he asked for you. Can you tell us who Gina is?

Answer. Yeah, she was an intern of ours.

Question. And did she deal with Mr. Chung?

Answer. Oh, yes, uh-huh.

Question. And what can you tell us about Gina's interactions with Johnny Chung?

Answer. Well, she was there during the periods he was popping in, and he also offered her a job which she took for a short time in China. I think China.

Question. Is that Gina Ratliffe, is that her name?

Answer. I don't know her last name.

Question. And your recollection is that she took a job with him in China?

Answer. I think it was in China or that she was definitely going to China or maybe that she started out in California.

Question. Do you have a knowledge about her working in the office in D.C. here for him?

Answer. No, I don't remember that. But I know that she worked for him. I don't know where he worked. I didn't know there was an office in D.C.

Question. Do you recall when she worked for him?

Answer. No.

Question. Now in this memo, this phone message of April 3rd, 1995, indicates that he called for Gina. Presumably she's still there at that time?

Answer. Yeah, I don't know.

Question. Do you know generally if it was '95 or '96 when she left to work for him?

Answer. I—I have no idea.

Question. And do you know what she was going to be doing for Mr. Chung?

Answer. No, I have no idea.

Question. Did you talk with her at all about going to work for Mr. Chung?

Answer. I definitely encouraged her to talk to her—I think her mother about it before making such a move, but she seemed very enthusiastic about it.

Question. And how old was she, if you recall generally?

Answer. I don't know.

Question. In her 20's?

Answer. Uh-huh.

Question. Young gal?

Answer. Uh-huh.

Question. And do you know where she is today?

Answer. No.

Question. Do you have any idea what happened to her after she worked for Mr. Chung?

Answer. I don't think she kept working for him.

Question. Do you know what happened with that job?

Answer. I know she left. She complained that he did not pay her.

Question. At all?

Answer. I don't know at all, but didn't pay her some money.

Question. Okay. Did you think that was strange?

Answer. I thought it was awful.

Question. Did you ever talk with him about it?

Answer. Oh, yeah.

Question. And what.

Mr. BALLEN. To who about it?

The WITNESS. Ever talk to Mr. Chung about it? Yes.

EXAMINATION BY MS. COMSTOCK:

Question. And what were your discussions?

Answer. It was just that if he owed her money, he should pay her because it was the right thing to do. And I was very unhappy. And I said I'm very unhappy about this, you know, something, too, like I thought much more of you. If you owe her money, you should pay her.

Question. Can you recall generally when this conversation occurred?

Answer. No.

Question. Was it—presumably it was some time after April 3rd, '95, if——

Answer. Could be. I don't know. Whenever she told me, and I don't know if she told me or Evan told me. But, you know, I knew and the next time I saw Johnny Chung, you know, I told him that this was not the way to operate.

Question. And what was his response?

Answer. I think I maybe petrified him a little bit.

Question. Why so?

Answer. Because I was—you know, I think that he was much more used to a kinder, gentler Maggie, but I was very unhappy if he had mistreated her, and I said that's just the wrong thing to do. That's not a fair thing to do, you know, I would expect so much more of you.

Question. And what did he say?

Answer. I'm sure it ended up with him saying he was going to pay her.

Question. And do you know if he did in fact do that?

Answer. I believe that he did, because I didn't hear any more from Evan about it or Gina and I would have heard something else from Evan, I imagine.

Question. Do you know, did you just run into him at the White House somewhere, or how this occurred, this conversation, this situation?

Answer. I think he was on one of his visits, one of his pop-in visits.

Question. Now at this time, you were aware that he was a managing trustee, right?

Answer. Uh-huh.

Question. Did you find it strange that he wasn't paying his employees, someone who was giving large amounts to the DNC but won't pay his employees?

Answer. No, that was really not the connection that I made. I mean at that moment, him being a managing trustee had very little to do with my disappointment in him.

Question. No, but in the sense that he—a managing trustee generally is someone who presumably has some means and money. Would that be a fair assumption? Or is that how you would think of someone, that they are not someone who is scraping by?

Answer. I did not have any thoughts, quite frankly, about him being a managing trustee or if he could pay her or not pay her. For me the issue was very simple. If he had had only two sticks to rub together, if he had promised to pay her, the fair thing to do was to pay her, whoever he was.

Question. You said—I'm sorry, the word you used was—he was used to a kinder, gentler Maggie?

Answer. Yeah, I think he was kind of a little bit startled, but I just felt it was not a good thing to treat a young person unfairly.

Question. And so you don't know what happened after that with Gina?

Answer. I believe I would have heard if I had not been successful in making my point to him.

Question. So that as a result of your talking to him, that Gina got paid?

Answer. I cannot say directly, but I can say I do not think it hurt.

Question. Did you mention to anybody else that he hadn't been paying Gina?

Answer. No, I didn't think that it needed to go beyond that. I'd spoken to him, and if the matter was resolved, which I assumed it was or I would hear it differently, it was over.

Question. Do you know how much she was supposed to be paid?

Answer. No, I didn't know any of the particulars.

Question. Was she a paid intern or a volunteer?

Answer. She was a volunteer.

Question. So when she was in the First Lady's office she wasn't get any salary or was she getting paid by the DNC or anybody?

Answer. Oh, no, she wouldn't—I believe she was just a straight volunteer.

Question. Okay. So when she left to go work for him, she was leaving an unpaid job to go——

Answer. Get a paying job.

Question. And do you have a sense generally of how long she stayed there?

Answer. I just never focused on it.

Question. Aside from hearing that she wasn't getting paid, did you hear anything else about her job?

Answer. No, I never—I mean, I really never thought any more about it there. We get lots of interns passing through our shop, but these were the two things I heard about Gina.

Question. Prior to when Gina left, do you know how long she had been at the White House?

Answer. I—I don't know.

Question. And after she left and she was working for Mr. Chung, did she ever call to try to get appointments or setups or anything or use her mess privileges with Mr. Chung?

Answer. I have no idea. Not that I knew.

Question. Did you continue to—despite this somewhat being upset with him for not paying Gina, did you continue to allow him to get into the White House if he would call? Did you ever say anything to Evan about let's not let him in any more or——

Answer. You know, probably not. I'm the kind of person that once a situation is resolved, I believe that nobody is perfect and many times people just need to have a situation brought to their attention so that they can handle it in the right way. And after that's done, everything is fine.

Question. Did—when you discussed this with Mr. Chung and you indicated, you know, that you didn't think—you know, that you expected more of him and things like that, did you ever mention anything about the First Lady would be disappointed or that—anything about——

Answer. No, no, I was—I was confident in my own right that I could say these things to him.

Question. And you knew he thought highly of you, and——

Answer. Well, I don't know.

Question [continuing]. And wanted access to you?

Answer. I don't know whether or not he thought highly of me or not. I don't know what he thought. But I do know that I felt confident that as a person who could see clearly the difference between what was wrong and what was right with respect to this young person, I certainly felt I could speak to the issue.

Question. Okay. And then continuing on the pictures then, after the call, there's a call to Gina on 4/3, then there's a call to Evan on 4/1 from Irene at AISI. Do you recall an Irene from his office ever calling——

Answer. I don't remember.

Question [continuing]. Asking about pictures? It could be a 4/4 there, it's difficult to read. And then there's another message on 4/7. I'm not clear there if it's Marge or Maggie. Because some of his visits were to Marge Tarmey, so I don't know. This is 59029 and it is a 4/7 phone message. It's Irene and Johnny Chung's office, AISI and it has a 310 number. I don't know if that's California or——

Answer. I don't know.

Question. Do you recall calling him in his California office or discussing——

Answer. I don't——

Question [continuing]. The pictures with him?

Answer. I don't know if I talked with him in person, if I talked to him on the phone, if Evan talked to me about it, but I remember that there was an issue about his pictures.

Ms. COMSTOCK. We will make that Deposition Exhibit Number 34.

[Williams Deposition Exhibit No. MW–34 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. You have previously discussed that you did hear about the President's—the pictures with the President from the radio address which had been, I guess, on April 11th. That you had heard that the NSC had some questions. Could you just describe in a little bit more detail, you know, what—how you learned what the NSC had any issues about—the pictures of Mr. Chung's friends?

Answer. I don't know if I called the NSC. If I asked Evan to call the NSC, and said—I mean, basically, the NSC is, as a unit, not very talkative, but I would say

that my indication from them was that they preferred not to send the pictures with the President to Johnny Chung.

Question. And why was that?

Answer. I really don't recall what the reason was, but it was clear that they—I don't know if they told me a reason or they said they preferred not to.

Question. Do you recall who you talked to then?

Answer. No, I mean, the NSC, their office.

Question. Do you know if you—I guess have you seen this e-mail?

Answer. Only in the last deposition.

Question. Okay.

Answer. I have never seen it before.

Question. The way these read is the first e-mail is on the bottom of the page and I believe—actually, the timing looks different, actually, maybe the top one is the first. So I will start at the top.

Okay. I am a little confused here because the time on the e-mail makes it look like the top one is earlier than the bottom one, yet the bottom one seems to—and the top one seems to be responding to the bottom one, but at any rate, why don't we start at the bottom.

Mr. BALLEN. In any case, the first time she saw these was at a deposition.

Ms. COMSTOCK. That is fine.

EXAMINATION BY MS. COMSTOCK:

Question. Do you know Melanie or Brooke Darby at all?

Answer. No.

Question. Do you know if you ever talked with her, if this is a person—if you talked to a man or woman in the NSC, if you recall if it was male or female?

Answer. I don't know. I mean, I called the NSC. I don't really recall. Like I said, I just don't recall. I only recall the gist of it.

Question. Okay. And the portion from Brooke Darby reads:

"An odd situation on which I need some guidance for the President's office asap:

"A couple weeks ago, late Friday night, the head of DNC asked the President's office to include several people in the President's Saturday radio address. They did so, not knowing anything about them except they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? FYI, these people are major DNC contributors and if we can give them the photos, the President's office would like to do so."

Mr. BALLEN. Is there any purpose in reading this?

Ms. COMSTOCK. So we know what we are talking about for the record.

Mr. BALLEN. The witness indicated she never seen this before.

Ms. COMSTOCK. She also testified she talked to somebody in the NSC about it.

Mr. BALLEN. So.

Ms. COMSTOCK. And we can go through documents to refresh the recollection of a witness who has testified that she has talked to people about the NSC.

Mr. BALLEN. Then ask if this document refreshes her recollection.

Ms. COMSTOCK. You can ask your questions during your time and I will ask the questions I would like to during my time.

Mr. BALLEN. We have been here for 8½ hours now asking questions. We need to have consideration for the witness' time in terms of getting to the point.

[Discussion off the record.]

EXAMINATION BY MS. COMSTOCK:

Question. Back on the record. Do you recall talking to Nancy Hernreich in the President's office about the pictures of Johnny Chung's friends?

Answer. I don't recall talking to her.

Question. Okay. The memo here says that Johnny Chung was going to go in to see Nancy Hernreich. Do you recall if he told you he was going to go in and see Nancy Hernreich about the pictures?

Answer. No.

Question. What is your knowledge of how Mr. Chung got the pictures?

Answer. I don't know.

Question. You have no knowledge of how he ended up with them?

Answer. No, I don't. I don't remember.

Question. Okay.

Answer. I don't. I mean, did he get them.

Question. I believe those are the pictures that we had referred to earlier. The pictures of his friends were the ones who had been there in the radio address, with the First Lady?

Answer. Well, I mean, I don't know if he got them.

Mr. DENNIS. These are pictures of Mrs. Clinton, not of the President.

EXAMINATION BY MS. COMSTOCK:

Question. Okay. This is a DNC, Office of the Chairman, memo to Johnny Chung from Carol Khare, K-H-A-R-E, regarding photo, and the comments on here are: "The White House assures me that you now have the pictures, hurray. If you don't, give me a call. Have a good trip," and that is fax date 4–11–95 on the top.

Answer. Can we go off record for a second?

[Brief Recess.]

EXAMINATION BY MS. COMSTOCK:

Question. Back on the record. Returning to the Suettinger and Darby e-mail, do you recall any—other than you talked to somebody in the NSC, do you recall any other exchanges within the White House about these NSC concerns?

Answer. I don't.

Question. And you had indicated that you thought the NSC didn't want to send him the pictures?

Answer. That was my sense, yes.

Question. And is your testimony that you don't know whether or not it was—how it was resolved?

Answer. Right.

Question. So you didn't know whether or not he ever got his pictures?

Answer. No.

Question. He never asked you again or?

Answer. No, I only remember that one instance, and if the NSC said they preferred not to, I didn't do anything else past that——

Question. Okay.

Answer [continuing]. That I can recall.

Question. Okay. These are two letters. One is to Don Fowler and one is to you from Mr. Chung. They are similar letters. Is that your fax number, [redacted]?

Answer. Right.

Question. Okay. And do you recall receiving this from Mr. Chung?

Answer. Could be. This may be how I heard or got the request that he didn't get the pictures.

Question. Okay. Do you know if you would have kept a document like this?

Answer. A fax, no.

Question. A letter from Mr. Chung asking about these?

Answer. No.

Question. Okay. In the letter, it says, "I have an important issue here that needs your assistance. As you always know, I am 100 percent supportive of the First Lady's office, always delighted to work with the DNC on every occasion," and then he goes on to discuss the business delegation, trying to get the pictures and he says, "I have learned from Mr. Richard Sullivan at the DNC, National Security Counsel is holding on to those pictures."

Do you know anything about how he learned—how Richard Sullivan learned of the pictures being held up?

Answer. No.

Question. Did you ever talk to Mr. Sullivan?

Answer. No.

Question. Do you know of anybody at the White House who talked to Sullivan?

Answer. No.

Question. Do you know who from the DNC was in touch with people at the White House to get pictures, when DNC people tried to get pictures?

Answer. I think it varied from office to office. It probably depended on the event or——

Question. Do you know—so you don't know if Mr. Sullivan ever called anyone in your office?

Answer. No.

Question. And in the second paragraph, he says, "If we are going to get our pictures taken with the President, you know, we should be courteous enough to let them have the pictures."

Did he ever express anything like that to you about, you know, we are going to take our pictures and, you know, they are my friends and then you are not giving me my pictures?

Mr. DENNIS. This is a letter addressed to her.

The WITNESS. This letter is addressed to me.

EXAMINATION BY MS. COMSTOCK:

Question. That is what I am saying, do you remember discussing that with him?

Answer. You mean verbally?

Question. Yes.

Answer. No.

Question. Did he ever indicate that, you know, he needed to take the pictures with him to China, which is reflected in the next sentence?

Answer. Only here.

Question. And then he closes with saying, "I look forward to seeing you this weekend at Mr. Steven Spielberg's party. Thank you again for everything."

Did you in fact see him at a Steven Spielberg party?

Answer. No, I wasn't invited to a Steven Spielberg party.

Question. I am assuming he means the producer, which is misspelled.

Answer. I understand that, but, no.

Question. And the other letter that he wrote to Mr. Fowler is, Donald Fowler, Chairman of the DNC, is essentially similar.

Do you know if Mr. Fowler talked to anybody in your office about getting these pictures from Mr. Chung?

Answer. No.

Ms. COMSTOCK. I would like to make the April 5th letter to Don Fowler—I'm sorry. Why don't I make the e-mail we were previously discussing, the Suettinger e-mail, Deposition Exhibit No. 35, and then the April 5th letter to Fowler, Deposition Exhibit 36, and the April 5th letter to you from Mr. Chung, to Margaret Williams from Mr. Chung, make that Deposition Exhibit No. 37.

[Williams Deposition Exhibit No. 35 was marked for identification.]

[Williams Deposition Exhibit No. 36 was marked for identification.]

[Williams Deposition Exhibit No. 37 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. And then we had previously shown you, I think it was before we went off the record, the DNC fax to Johnny Chung. This is Johnny Chung, JCH 1251, which it says, "The White House assures me you now have the pictures."

Do you know of anybody in your office being in touch with Carol Khare at the DNC?

Answer. No, and I don't know who she is.

Question. You don't know who she is; you never talked to her?

Answer. No.

Question. Okay.

Ms. COMSTOCK. I will make that Deposition Exhibit No. 38.

[Williams Deposition Exhibit No. 38 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. And this is a March 28th, 1995, memo from Betty Currie. It is a redacted—it appears to be a redacted memo. It is not marked as redacted, but portions of it appear to be missing. But number two here, the only part on here, talks about, Ceandra Scott called, said she was concerned about Johnny Chung.

Do you know who Ceandra Scott is at the DNC?

Answer. Yes.

Question. Do you know who she is?

Answer. Yes. She worked in the chairman's office at the DNC.

Question. Okay. And does Betty Currie normally do memos for the President at the White House?

Answer. I don't know.

Question. Or does she do them for—besides—I mean, she is the President's secretary, is that correct, and in his personal office?

Answer. Yes, but I don't know how they are arranged.

Question. Okay. I am wondering, do you know, aside from the President, anybody that Betty Currie does work for or writes memos to?

Answer. I don't—I really don't know——

Question. Okay.

Answer [continuing]. How they arrange their work.

Question. Did you ever have any conversation with Ceandra Scott about Johnny Chung?

Answer. Not that I can recall.

Question. Do you know if anyone in your office did?

Answer. I don't know.

Question. Have you seen this document before?

Answer. Prior to my deposition.

Question. In a previous deposition or in reviewing documents prior to that?

Answer. At a deposition.

Question. And I don't mean to go into if you discussed documents with your attorney.

Answer. At a deposition I saw this.

Question. Okay.

Answer. And——

Question. But the memo indicates she stated that we should have called them prior to their coming to the radio address, and I guess "them" meaning the DNC. Ms. Scott works at DNC in the chairman's office?

Answer. Yes, she does work there.

Question. Do you recall any discussions that you should have called the DNC before allowing these folks to go to the radio address?

Answer. I couldn't make any sense of what she meant.

Question. So where she is saying here, apparently, they were in Maggie's office when requests came, and Maggie said she didn't know but to contact DNC, you don't know——

Answer. I don't know what she meant by this.

Question. And you had no discussion with anybody that allows you to make any sense of this document?

Answer. I have read it over several times. I don't quite know what they mean, "when requests came" and "Maggie said she didn't know but to contact DNC." I mean, I don't know.

Question. Did the radio addresses normally get set up by the DNC, who would go on the radio addresses?

Answer. No, but I think that the DNC, as I said before, can certainly, you know, recommend people they would like to come to the radio address, as anyone can.

Ms. COMSTOCK. Okay. I will make this EPO 55492, the March 28 current memo, Deposition Exhibit 39.

[Williams Deposition Exhibit No. 39 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Now I have given you this March 6, '95 memo to Bobby, which was Bobby Watson, from Richard Sullivan, and it discusses Johnny Chung trying to get work from the DNC. Did you have any knowledge about him, his blast fax being used at the DNC?

Answer. No.

Question. Had you seen this document before?

Answer. This is the first time I have ever seen it.

Question. And in this document they discuss AISI, Mr. Chung's company, as used by many political clients, including Governor Chiles and Senator Kennedy and others. Did Mr. Chung ever tell you Senator Kennedy or Governor Chiles used the system?

Answer. Not that I remember.

Question. Okay. And so you have no knowledge about him getting this contract at all?

Answer. No.

Ms. COMSTOCK. Make that Deposition Exhibit No. 40.

[Williams Deposition Exhibit No. 40 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. And just returning to when Mr. Chung gave you what—what you recollect of him giving you a check, you did not know the amount of the check at that time?

Answer. No.

Question. You didn't open the envelope—or you don't recall if it was in an envelope?

Answer. I don't recall.

Question. But you had some recollection you thought it was $10,000?

Answer. For some reason, I thought it was $10,000.

Question. And do you recall him giving you any note with the check or anything like that?

Answer. No.

Question. He has indicated that the note, it said something like, "I do what I can to help," something to that effect. Do you recall him giving you any type of note like that?

Answer. No.

Question. Do you have any knowledge of how Mr. Chung would know anything about debts that the DNC owed for White House Christmas parties?

Answer. I don't know. It would—I mean, I don't know.

Mr. DENNIS. Don't speculate.

EXAMINATION BY MS. COMSTOCK:

Question. You never discussed that with him?

Answer. With Johnny Chung?

Question. Yes.

Answer. No.

Question. And this is a memo to Margaret Williams to Gary Walters of March 24, 1995, regarding unpaid bills for collection issued by the executive residence at the White House for fiscal years '94 and '95. Did you deal with Mr. Walters on these type of bills?

Answer. Yes.

Mr. BALLEN. She testified to this already.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall receiving this memo? I'm sorry, you have my copy again.

Answer. I don't recall this one specifically, but as I testified, I said from time to time he would talk to me or give me a memo.

Question. This is DNC document 3078128 through 31. Do you recall on or around, you know, late February, early March of

'95, discussing the bills with Mr. Walters?

Answer. I don't recall the specific time, but as I said, you know, from time to time I would get a memo or I would see him and he would tell me about it, and I would talk to him about it and say I will call somebody at the DNC or, as I said before, I would tell Mr. Ickes, "I think they should pay their bills" or, you know.

Question. And do you know what Mr. Ickes would do?

Answer. No.

Question. And so you would—Mr. Walters would—do you know where in the process he would—he is writing you a memo here. Was this after having had a number of discussions with you about it, or if he had talked to others, or where in the process of the sort of efforts to collect on the bills that this memo may have come, if you know?

Answer. I mean, I don't know if he had a process or any kind of timing around writing a memo or talking to me about it, about the bills. I don't think it is anything that he had a planned time or process.

Mr. DENNIS. I will just make a note that on this document there are a number of instances in which the bill had not been submitted, no address, question mark, DNC. I will just bring that to your attention.

EXAMINATION BY MS. COMSTOCK:

Question. But in early 1995, were you aware of the DNC—you said they had been habitually late in paying bills.

Answer. Yes.

Question. Were you aware of them not having paid Christmas bills?

Answer. Whatever Mr. Walters had alerted me to, I knew that they hadn't paid.

Ms. COMSTOCK. I will make that Deposition Exhibit No. 41.

[Williams Deposition Exhibit No. 41 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Then this is another document, DNC 3080883 through 6, which was immediate attention, a fax from the White House to Joe Sandler from Jodie Torkelson. Can you tell us who Jodie Torkelson is?

Answer. I don't know what her title was, but she was ahead of administration at the White House.

Mr. DENNIS. I think this is your copy again.

Ms. COMSTOCK. Sorry. Thank you.

EXAMINATION BY MS. COMSTOCK:

Question. Do you know, the previous memo we reviewed had not been sent to Jodie Torkelson. Do you know why Jodie Torkelson by August of '95 had been brought in and memoed on this from Mr. Walters, if you had any discussion with Mr. Walters about that?

Answer. No.

Question. Do you know if you had any meetings with Ms. Torkelson and Mr. Walters about these matters?

Answer. I don't know if we had a meeting. I was aware that Jodie, obviously aware that she received it, since I see her name here. But I would just be speculating as to why they went to Jodie.

Question. Directing your attention to—it actually was on the previous document, on the third page of it, the March memo from Mr. Walters, and on the third page of this memo there is an indication that there was a partial payment of $198,714.56 made on March 15, 1995 for various events up to that time, apparently, that were overdue.

Mr. BALLEN. Counsel, where on the document are you?

Ms. COMSTOCK. 3080886, in the September 5, 1995 fax, I should say August 1, 1995 memo, and then it's on page 3, DNC 3078130 of the previous memo we were discussing from Gary Walters, March 24, 1995 memo. There is an indication that close to—approximately $200,000 payment for receptions and events was paid by the DNC on March 15, 1995. Do you recall in or around mid-March——

Mr. DENNIS. I'm sorry, where does it say about the DNC? I want to make sure.

Ms. COMSTOCK. It says partial payment. This is saying partial payment for the events, so I don't know that they are all—you are correct, it doesn't say DNC, it just says partial payment. I'm sorry about that.

Mr. DENNIS. I don't know, because there are other things that are kind of mixed in.

Ms. COMSTOCK. There are press events in here, some of them are the press not paying; other people are involved in this.

EXAMINATION BY MS. COMSTOCK:

Question. Do you know, at or around mid-March, 1995, anything about the DNC making payments to the office?

Answer. No.

Ms. COMSTOCK. Okay. I will make that Deposition Exhibit No. 42.

[Williams Deposition Exhibit No. 42 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Aside from the one conversation that you have relayed already today with the First Lady about Johnny Chung, did you have any other conversations with the First Lady about Johnny Chung?

Answer. Ever have any?

Question. To date, if you have had any conversations about Johnny Chung.

Answer. To date, yes.

Question. And can you tell us when those—approximately when and what the substance of those conversations was, would be?

Answer. It was after there was a newscast about the Johnny Chung check for the DNC being handed to me by Johnny Chung, and she called me and she said, you know, "How are you doing?" She was trying to find me. She beeped me, she said, "How are you doing? What is going on?" And I said I essentially took this check and gave it to the DNC.

Question. Did she ask you about what happened or what this is about?

Answer. Yes, and that is what I told her.

Question. So she asked you, you know, what is this, what can you tell me about it?

Answer. She said, "What happened?"

Question. All right. And you told her?

Answer. I told her, because she had seen this on the news, I told her Johnny Chung gave me a check for the DNC and I sent it to the DNC.

Question. And what did she say?

Answer. She agreed with me that this seemed rather ridiculous, to lead the news with something like this.

Question. Did you have any further discussion, do you recall?

Answer. No. Then I just said to her, you know, "Don't worry about it."

Question. And did the press people at the White House also talk with you about that, or did you have your attorney handle the matters?

Answer. I had my attorney.

Question. So the only person you talked about this with when the press stories came out was Mrs. Clinton?

Answer. Yes, and—oh, at the White House, yes, and my attorney dealt with everyone else.

Question. Did they ever talk with Evan Ryan about Mr. Chung when the news accounts came out?

Answer. Yes, when there was a particularly tough article about her in Time magazine, she was very upset, and I talked to her and I told her that this was the price of public life in the nineties.

Question. Did she talk to you about her account, her recollection of what Mr. Chung had done in connection with the check?

Answer. No.

Question. Do you know if she had any?

Answer. No. If there is one thing that these experiences have taught us over the 4 years, it is not to talk to each other.

Question. You had mentioned that Johnny Chung generally talked about, you know, you should come to China and that kind of thing. Were you aware of Don Fowler ever planning on making trips to China with Johnny Chung or going on any business trips with Mr. Chung?

Answer. No.

Question. He never mentioned that to you, or anything like that?

Answer. No.

Question. Okay. Returning to the WAVEs, Mr. Chung continues—after this March 8th, 9th time frame, he continues to be WAVEd into the White House, usually by Ms. Ryan. Do you know what he was coming in for in any of these other cases?

Answer. I think no differently than before, wanting to stop by, wanting to walk around. I don't have any other information.

Question. Okay. If he needed to use the mess and that kind of thing, that still went on and continued to go on, or did that stop at some point?

Answer. It depends. At whatever point that the White House counsel issued a policy memorandum, I think about the use of mess accounts, so if he had asked me prior to that time—and I don't know what this time frame is and how it fits in, when the White House sent out their memo about use of mess accounts—that if he had come prior to that, I would have let him use my mess account. If he had come after that memorandum, then I would not have.

Question. Okay. I think from the WAVE records we have, his last visit appears to be June 15th, 1996. Does that help you recall at all?

Answer. You would have to—I don't know when that memorandum was issued.

Question. Actually, he wasn't WAVE'd in by Ryan at that time, it was Forster who WAVE'd. Do you know Forster in the West Wing?

Answer. No.

Forster?

Question. Forster.

Answer. No. You can let me see the spelling. I don't know anyone offhand.

Question. F-O-R-S-T-E-R, page EPO 5029?

Answer. No, I don't know anybody with that name.

Ms. COMSTOCK. We will make this WAVE grouping Deposition Exhibit No. 43, and it is the WAVEs records we have been discussing throughout the deposition, just so it is clear for the record.

EXAMINATION BY MS. COMSTOCK:

Question. Did Evan Ryan ever complain or raise to you anything about Johnny Chung, like when he kept continuing to call?

Answer. Yes.

Question. And what did she say?

Answer. She was irritated by it.

Question. And what did she say that led you to thing she was irritated?

Answer. Knowing Evan, she said, I am irritated by it.

Question. And why, that it was frequent, he is a nuisance?

Answer. Yes, she just found him annoying.

Question. And what did you tell her?

Answer. Pretty much a lot in life is annoying, but if he was not hurting anybody, and there didn't seem to be any indication of it, I expected her to work harder at her tolerance level, and that he should still be treated very well.

Question. These are some phone records from September '95; again, a message to Evan Ryan on 10–20–95, says, sending flowers to you and Maggie.

Do you recall receiving flowers from Mr. Chung?

Answer. Maybe. I don't know. Could be.

Question. What is the process—when you get flowers at the White House, do they have to get checked out?

Answer. Yes, they go through a check and an X-ray machine, and somebody brings them up, and it is probably the only thing you can keep in the White House because they know that it will die.

Question. Are flowers frequently delivered to the First Lady's Office?

Mr. BALLEN. I am going to object. This witness has been here almost 10 hours, and we are talking about flowers.

Could I finish my objection, please?

The witness has been here, we have been here for 10 hours now, and we are now going to ask her about the procedure for flowers.

The WITNESS. They have been delivered. I don't think it is terribly frequent.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall getting flowers from Mr. Chung?

Answer. No.

Question. Okay. And then on another occasion, September 29th, 1995, he also indicates in the message, sending a couple of baskets of flowers for you and Evan. Do you have any recollection of that?

Answer. No.

Question. Do you know of any particular favors or anything he was asking at this time that would generate sending flowers?

Answer. No. Once again, there is nothing that Johnny Chung would have to do for us to have treated him well, nothing.

Ms. COMSTOCK. Why don't I make the 9–29 message from Johnny Chung, EPO 59074, Deposition Exhibit 44; and EPO 59059, which is the 10–20–95 message, make that 45.

[Williams Deposition Exhibit No. WM–44 was marked for identification.]

[Williams Deposition Exhibit No. WM–45 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. The WAVE records indicate that Johnny Chung was at the White House on 10–19–95. I believe it's at or around the time, if not the date, at or around the time of the Hazel O'Leary check of $25,000 that was given to Hazel O'Leary.

Do you know if anyone at the White House ever discussed with Mr. Chung anything regarding Hazel O'Leary?

Answer. No. The first I have heard about that was on the news last week.

Question. Okay. Did Johnny Chung ever tell you he was interested in meeting Secretary O'Leary about any energy matters?

Answer. No, Johnny Chung never asked to meet with anyone. He never asked me about meeting with anyone.

Question. Okay. Did he ever talk about—at least one of them was one of the ones of the five people who were in the radio address—but any people involved in the petrochemical business or the oil business?

Answer. No.

Question. Were you aware of him talking with George Stephanopoulos about his oil business or any of his businesses?

Answer. No.

Question. Or any efforts to get together with Mr. Stephanopoulos over any business matters?

Answer. No.

Question. Do you know if he ever talked to George Stephanopoulos about getting in touch with any Chinese VIPs?

Answer. I didn't know he ever talked to George Stephanopoulos.

Question. So you have no knowledge of him talking with George?

Answer. None at all.

Question. Aside from what you have read in the press, do you have any knowledge of the Hazel O'Leary Africare contribution? I am sort of shorthanding it here, you know, referring to the recent press articles. This is a copy of an NBC News transcript on this, which is discussing his allegations regarding Secretary Hazel O'Leary providing $25,000 to a favorite charity.

You have no knowledge of any of the events or cannot enlighten us to how any of these events came about?

Answer. No, I didn't know he even knew Secretary O'Leary.

Ms. COMSTOCK. I will make that Deposition Exhibit No. 46, just so the record is clear, kind of what we are referring to here, since we are moving through that fairly quickly.

EXAMINATION BY MS. COMSTOCK:

Question. You indicated you thought he may have given you the business cards of the gentlemen who you recall bowing to?

Answer. Uh-huh.

Question. Do you recall if you kept those or what you did with them, or was that sort of going in a drawer?

Answer. I think they were in Chinese. I just never saw myself as having any use for them.

Question. Do you know if any type of—in the discussions with the NSC people, do you recall if there was any type of background check run on these guys, the five guys who went to the radio address that raised the red flags?

Answer. I don't know what they do, what they would do.

Question. Was there anything in particular you recall that made them leery of them, that they wouldn't want—you said you had a sense they didn't want the pictures out. Did you have an understanding of, gee, who was it that I let in there that the NSC doesn't want the pictures out?

Answer. Well, the NSC——

Mr. DENNIS. Well, before you answer that question, that question assumes she let them into the radio address.

The WITNESS. I didn't even think about that.

EXAMINATION BY MS. COMSTOCK:

Question. To the extent they were in, and people are asking you now or you are talking about them, you know, who are these people who came in, and they are asking about it, did you have a sense of what their concerns were about these people?

Answer. In general the NSC and any people who are concerned with security at the White House never explained. I mean, they just never explained.

Question. No one said anything like, these are Chinese nationals that are connected with anything, it is just sort of we have a general concern, you don't have a need to know?

Answer. I don't know the specifics, but I do know they expressed some kind of preference that going any further really wasn't, you know, worthwhile.

Question. And the e-mail that we have previously looked at, the NSC e-mail, referred to them as a hustler. Do you recall them ever saying anything about him trying to use his access to the White House and how he might use these pictures?

Answer. No.

Question. Do you recall—are you familiar with the picture that he had with the beer executives that has been on the news quite a bit?

Answer. I don't really recall.

Question. Do you have any recollection about him bringing the beer executive people from China into the White House?

Answer. No. I mean, I wouldn't know who they were.

Question. After, given the NSC had raised concerns about the people who were with Mr. Chung, did that ever cause anybody in your office or for you to re-evaluate the continued access of Mr. Chung to the White House?

Mr. BALLEN. Excuse me. Was it your testimony that they raised concerns or that they just weren't using pictures?

The WITNESS. They weren't really seeing the pictures.

Mr. BALLEN. There is a difference.

EXAMINATION BY MS. COMSTOCK:

Question. You weren't aware at that time they considered him a hustler or might use his access to the White House, the NSC, anyone at the NSC?

Answer. I wasn't, but, my God, if we kept hustlers out of the White House and the halls of Congress, who would there be?

Question. I wanted to ask you just a few questions about the Back to Business Committee. You have previously testified that Lynn Cutler gave frequent meetings at the White House regarding women's issues?

Answer. Yes.

Question. Did you ever discuss with Ms. Cutler the Back to Business Committee?

Answer. Over the phone, I remember when Lynn and I, and I guess some others, talked about the idea of having this kind of committee that would mostly do public

responding to some of the issues that had been raised, that seemed to have very little to do with governing, and she told me about the idea, and, you know, I was delighted to hear there were people outside who were going to be doing that.

Question. And was it your understanding Ms. Cutler was going to be involved in orchestrating that?

Answer. Well, that she was going to be involved with other people. There were a good number of people who had already been responding on television who were not in the White House. Lynn Cutler had been one of them, and there were other people, and they decided to be more organized about it.

Question. Okay.

Mr. BALLEN. I am going to object to this line of questioning on the Back to Business Committee as being outside the relevant scope of this inquiry. Is there a specific question related to specific campaign fund-raising improprieties or law? Perhaps I could recall the objection.

EXAMINATION BY MS. COMSTOCK:

Question. What was Anne Lewis's role with the committee?

Mr. BALLEN. Same objection.

The WITNESS. She was a spokesperson.

EXAMINATION BY MS. COMSTOCK:

Question. All right. And she is currently the communications director at the White House; is that correct?

Answer. That is correct.

Question. Did you ever have discussions with her about the Back to Business Committee?

Answer. About the committee?

Question. Uh-huh.

Answer. Not about the committee itself. I certainly knew when they had people they were putting on television.

Question. And did you ever discuss the Back to Business Committee with the President and First Lady?

Mr. BALLEN. Same objection.

The WITNESS. I don't believe I have discussed it with the President. I can't imagine that I didn't mention to Mrs. Clinton that there were outside people who were actually getting on the airwaves and taking on some of these charges.

Mr. DENNIS. Before we go any further, point of procedure. When an objection is made, is that basically preserving for the record?

Mr. BALLEN. If you want to join in the objection, in terms of the witness not answering, then we proceed in to the Chairman and the committee rules.

Mr. DENNIS. So if the witness answers the question, the objection becomes lost.

Mr. BALLEN. It doesn't become lost, the committee can still make a judgment on that, and the judgment is it is not relevant, it will be stricken.

Mr. DENNIS. Stricken from the dep.

Mr. BALLEN. That is correct.

EXAMINATION BY MS. COMSTOCK:

Question. Was the First Lady then aware of what the Back to Business Committee was going to be doing?

Answer. Well, yes. As I said before, I know at some point I told her there are groups outside of the White House who are going on television, and for all the people who are saying mean and untrue things, there are people who are answering those things.

Mr. BALLEN. Excuse me, please. Let me just clarify something in your response to counsel's question.

The committee won't necessarily take it up. So that the objection, the single fact that a Minority counsel makes an objection, I cannot guarantee to the witness or counsel that that will be taken up by the committee and stricken from the record.

If counsel wants to make an objection now, then the questions won't proceed. Or if counsel wants us to take this up with the committee, then you can make that kind of a request.

Mr. DENNIS. Let me do that. Can I have the witness leave the room shortly while I discuss this matter with counsel? I want you to step out in the hall. We will stay on the record.

[Witness left deposition room.]

Mr. DENNIS. This is my concern about this. One, it is getting very late; and we've been here quite a long time. I understand that this Back-to-Business issue is one

that Chung has raised in some press accounts in which he has said that Ms. Cutler had approached him and mentioned Ms. Williams as the source of a referral and he might be interested in supporting the Back-to-Business initiative.

Now, for that reason, it certainly has something to do with fund-raising; but I don't see on that basis whether it has to do with any improprieties, just taking his statement as absolutely true. So my question is, what is the basis for really going over this area as one that would involve any kind of, you know, impropriety or fund-raising misconduct? And that's—you know, particularly at this hour, to get into this——

Ms. COMSTOCK. I don't think—I think we are—this is—we are going to be moving into all the events with—with Ms. Cutler and the references and that type of thing. I think, given Mr. Chung's connections with the White House, these are matters related directly or indirectly, certainly. But having the U.S. ambassador to China become involved in this and any connections regarding—these are factual matters that are connected to a number of matters we are investigating, Mr. Chung, obviously, being a major figure. So looking at how Mr. Chung was involved in any number of areas where he was giving money to various sources——

And I would like to state for the record I appreciate you asking your client to leave the room so we are not both testifying about the matters in front of her, and I appreciated that courtesy of not infecting the records. I do want to reflect that the witness isn't present.

I think we can be fairly brief, just discussing the news accounts and, you know, her knowledge of Ms. Cutler's—and references on that. And I think that's where we are going in this area.

Mr. DENNIS. Well, let me proffer to you as a way of hopefully cutting this somewhat short that, you know, my client can certainly testify concerning the fact that, you know, she knew of the Back-to-Business efforts and what that involved in some general fashion. But I will not object unless this becomes too drawn out. I mean, I would hope that we could cooperate and get to the point where you could just ask her the general question and let her describe in her own words what her involvement was in that and what the involvement was of Johnny Chung.

If you want to have some follow-up questions, that's fine. But her to be sort of the—she wasn't the organizer of Back to Business and your questions are eliciting a lot of "I don't knows"—I don't know, I don't know. And, of course, when you question somebody about something they don't know about—you understand what I'm saying?

Ms. COMSTOCK. I think we can be fairly brief and ask her some follow-up on that.

Mr. DENNIS. Is this the last area?

Ms. COMSTOCK. Basically, it is. I want to check on a few other things, but we are getting close.

Mr. BALLEN. I want to note for the record——

Mr. DENNIS. I am not making an objection.

Mr. BALLEN. I didn't understand the answer to Mr. Dennis' question, which was the basis of my objection as well, as to how this relates to campaign financing.

Ms. COMSTOCK. I think we have moved on, and the witness is not objecting. If we could just move through this quickly.

Mr. BALLEN. Well, I have an objection pending.

Mr. DENNIS. I can't—I'm not——

Mr. BALLEN. I want to know how the Back to Business Committee relates to our investigation. There is a specific question as to campaign fund-raising improprieties. Can you answer the question?

Ms. COMSTOCK. Your objection is noted.

Mr. BALLEN. I am going to note for the record that you are refusing to provide an explanation——

Ms. COMSTOCK. I have already provided the explanation, and I think the public record is clear on this and that it is relevant, and we would like to proceed on the Back to Business Committee and the contributions made by Mr. Chung to that committee.

Mr. DENNIS. Okay. I'll have the witness come back in.

[Witness returns.]

EXAMINATION BY MS. COMSTOCK:

Question. Okay. Why don't you just tell us—give us kind of what you know about Lynn Cutler and any conversations you may have had with her about Johnny Chung.

Answer. Lynn Cutler asked me if there were people that I knew of who would be interested in helping the Back to Business Committee. And not only was she

looking for—she said contributors, people who could go on television, who could be helpful. And I said, well, these are people I think you might want to call. And Johnny Chung, I included his name as one of the people.

Question. And did you provide her with a list of other names?

Answer. I didn't give her a list. This was just a verbal conversation. I believe I gave her some other names. There were a couple of people I gave her that I thought would be really good on television that I suggested that she contact.

Question. And who were the other people that you told her to contact? Just to be clear, you told her that Johnny Chung would be a person to contact about raising money?

Answer. Yes. She said, I'm looking for people—if there are people who would be interested in helping the Back to Business Committee, contributors, people who would be good on television. And I said, yeah. I gave her Johnny Chung's name, and I gave her a couple of names of people for television.

Question. Did you give her a phone number or way to contact Mr. Chung?

Answer. I don't know if I did right then and there. I don't know if I did. I don't know if I did.

Question. Do you have any knowledge as to how she learned how to contact him?

Answer. No, I don't have any knowledge.

Question. Mr. Chung has indicated that he was called the morning after he attended a White House Christmas party. Do you recall if you ever told Ms. Cutler that, hey, he's going to be in town, he's going to be at the Christmas party, you might want to talk to him then?

Answer. No, I mean, more than likely I would have—if she asked for a number, called the office for a number, we would have given it to her.

Question. And can you just continue as to after you gave her——

Answer. That's——

Question. Did you ever learn whether or not he had contributed?

Answer. No.

Question. Did he ever tell you that he wanted to let you know that he had done this to help the First Lady or the President?

Answer. I don't know. I don't recall. I don't know. I don't know if he contributed. I don't know.

Question. When—you had previously discussed when he gave you the $50,000 check he talked a lot about "I want to help the First Lady"——

Answer. Uh-huh.

Question. And that he was anxious that you take the check; is that correct? That you——

Answer. Yes, or the First Lady's office. He was anxious that I take the check. He said, "I want to give through the First Lady's office," definitely.

Question. Did you recall him saying that he wanted to get credit with you or wanted you to get credit for getting the check?

Answer. No, I don't think he—I mean, I don't know if he said that to anyone. I mean, or—and I have no reason to believe he would—would think that. Would get any credit?

Question. When he had given you the $50,000 check, did you get a sense that he wanted you to know that he gave so the First Lady would know?

Answer. No, I got the feeling that he wanted me to give the check to the DNC.

Question. But if he'd given it direct—I mean, he had—we don't have the record here today, but he had met—I don't know if you're aware, but he had met numerous times with DNC people on many occasions. He could have given checks to them.

Answer. Which he had.

Question. Do you know why in particular he felt giving you this check was something that would——

Answer. You would have to talk to him about his motivation.

Question. But did he ever say anything to you about, tell the First Lady that I gave this check or I hope you let her know I've done this to help her?

Answer. No, he never—no, he never said that to me.

Question. So you cannot recall if he ever told you anything about the check that he gave the Back to Business Committee?

Answer. No, I can't.

Question. Did Ms. Cutler ever tell you whether she was successful in getting money from him?

Answer. No, I don't believe she did.

Question. So, to date, you have had no other conversations with Lynn Cutler about Johnny Chung?

Answer. No.

Question. Okay. The White House—well, I will just give you this—the August 9th one. This is an August 9th, 1997, L.A. Times article entitled, Donor Speaks Out on Clinton Group. On the second page of the article at the top of the page, a little ways down, fourth paragraph, it says, "White House officials confirm that Cutler arranged a meeting for Chung with a Commerce Department official."

Do you have any knowledge about when—Lynn Cutler arranging meetings for Johnny Chung?

Answer. No.

Question. And do you have any knowledge about when Cutler—Lynn Cutler arranging any meetings with the U.S. Embassy in China or with Ambassador Sasser?

Answer. No.

Question. So was the first time you learned of that in the news accounts?

Answer. Yeah, I just read them yesterday.

Question. In this article also Lanny Davis was quoted as saying that there were frequent—White House involvement with Back to Business included frequent contact.

Just generally—I don't want to dwell on this for a long time. Can you generally describe what the frequent contact was and who was having the frequent contact with the Back to Business Committee, if you know?

Answer. Well, I don't know what it is that Lanny was speaking about. I can say that if Back to Business put out a press release or if they were going to be on any of the shows over the weekend, talk shows or anything like that, generally they would fax me a copy of the press release and they would fax me a list of who they had on the weekend shows. And for a while they were pretty active. So, with me, I knew what they were doing, so that would be frequent contact. I don't know with respect to Lanny.

Question. Was anybody at the White House writing or working on any of the material that they put out?

Answer. No.

Question. Do you know what Mr. Ickes' involvement with the group was at all, if any?

Answer. I think very little, actually.

Question. Do you have any knowledge of Back to Business Committee ever hiring any private detectives or anything like that to investigate chairmen of committees who were investigating Whitewater or other matters?

Mr. DENNIS. You mean chairmen of congressional committees?

The WITNESS. No.

EXAMINATION BY MS. COMSTOCK:

Question. Congressional committees. Do you know an individual by the name of Jack Palladino?

Answer. I've heard his name.

Mr. BALLEN. Objection as to relevancy.

EXAMINATION BY MS. COMSTOCK:

Question. He's a private detective from San Francisco who allegedly worked in the '92 campaign. You don't—have you ever met him?

Answer. No.

Question. Do you have any knowledge of Harold Ickes hiring Mr. Palladino at any time for any purposes while you have been at the White House? Have you ever heard anything like that?

Answer. No.

Question. The middle of the page or so here in the article it indicates that a source close to Cutler said that she learned of Mr. Chung and his potential interest in helping from a number of different places as a result of her involvement with the Democratic Party. Do you know—aside from yourself mentioning him, do you know of others who told Lynn Cutler of Johnny Chung?

Answer. No.

Mr. DENNIS. I believe—was she a vice chair of the DNC?

The WITNESS. Yeah. Yes, she was.

EXAMINATION BY MS. COMSTOCK:

Question. And, to your knowledge, was she in frequent contact with the DNC——

Answer. I don't know.

Question [continuing]. The DNC finance officials?

Answer. I really don't know what the contact was.

Question. You had mentioned that you had given—did you give Lynn Cutler other names of people besides Johnny Chung?

Answer. Yeah, I believe so.

Question. Do you know how many names you gave her?

Answer. Four, maybe three.

Question. Do you recall who else, other names you gave her?

Answer. I know I thought that she should contact a woman by the name of Kiki Moore because she was very good on television.

Question. In terms of donations, was there anyone besides Mr. Chung whose name you gave her?

Answer. That's all I can recall.

Question. Do you recall why you came up with Mr. Chung's name of all the people out there that would be donating that would be interested in helping the President or the First Lady?

Answer. Because it seemed to me for weeks and months Mr. Chung had stopped me and said: How can I help? How can I help? How can I give? So I thought of him.

Question. Mr. Chung's account of the call from Mr. Cutler says that he received a phone call at his Washington apartment. Did you know of him having a Washington apartment?

Answer. No.

Question. And you have no knowledge of—did you have a phone number in D.C. to contact him at, if you know?

Answer. I don't know. Evan would have had his number. I had no reason to call him. I can't remember.

Question. Do you know if she would have maintained those records, had them on any type of Rolodex or file or anything?

Answer. You'd have to ask her. I don't know.

Question. Mr. Chung's account also has indicated that Lynn Cutler introduced herself as a friend of the First Lady who was referred to him by Williams. Do you—is Lynn Cutler a friend of the First Lady, to your knowledge?

Answer. Oh, I think that's pretty subjective. If she thinks she is——

Question. Does she have frequent contact with your office, aside from the meetings that you had occasion to be at, events with the First Lady or have worked with her in the past on various events?

Answer. Lynn Cutler's been in Democratic politics for 40 years. I'm sure that she has known the President and Hillary through their governorship. She actually ran for Congress. I mean——

Question. Do you recall if you told Lynn Cutler that she could use your name, you know, so that—or that she could say——

Answer. Let me ask a question just for one second. Has Mr. Chung been deposed?

Question. No.

Answer. And so these questions are based on this news article?

Question. Right. I have the news article, and I'm pretty much referring—I'm kind of in the bottom paragraph here. I'm just referring to his allegations.

Answer. So we don't know if these are real allegations? These may be——

Question. He's not testified to these.

Answer. So we don't know if the reporter has put these down as what he says. Do we have any way of validating what has been said here?

Question. Not until Mr. Chung comes in.

Answer. Well, I just—with all due respect, I am here and I am here voluntarily and I have been here for almost 10 hours. And I'm perfectly willing to do this because I want this thing to work out and I want people to get to the truth. But I want some fairness accorded to me.

And so when Mr. Chung says something and he is on the record, I will respond to it. But I really feel very uncomfortable and not very happy that I have to walk through the L.A. Times, to have what some reporter whose work cannot be validated be up against me who is sitting here and to be on the record with this.

Question. Well, I would just like to, you know—we are discussing—these are only things he has talked about here and you have indicated that you gave his name to Lynn Cutler.

Answer. Which I said—I don't know past that.

Question. You don't know if you said anything about——

Answer. I gave—I gave her his name. I gave her his name. I did that.

Question. Do you recall if you gave Lynn Cutler any dollar figures? Like you could ask him for this much or gave her a ballpark figure of what he might——

Answer. I would never have.

Question. You just gave her the name and that was it?

Answer. That was it.

Question. Did you have any understanding whether she was going to use your name in approaching him?

Answer. I had no understanding of it, but if you live in Washington, D.C., I think you have a sense that people use people's names all the time. And if he wanted to try and verify that she actually got his name from someone, I'm sure he might even ask her and she would say Maggie Williams told me to call. It doesn't strike me as out of the realm of possibility.

Question. Did you hear about Johnny Chung calling around about Lynn Cutler: Should I give her money? Should I be talking to anybody at the White House or the DNC about it?

Answer. I only know what I read in the news accounts with respect to that.

Ms. COMSTOCK. Okay. Just so it's clear, we have been discussing about the news account. I will make that deposition number 47.

The WITNESS. Thank you.

[Williams Deposition Exhibit No. 47 was marked for identification.]

Mr. DENNIS. Are we getting pretty close here? Because it's almost 8 o'clock; and, of course, Minority counsel has——

Mr. BALLEN. I didn't hear what you said.

Mr. DENNIS. I was asking whether or not we are getting close to the end here. Because you have an opportunity to ask questions, and we have been sitting—we have been going pretty——

Ms. COMSTOCK. We are getting very close.

EXAMINATION BY MS. COMSTOCK:

Question. The White House database had been incorporated into the First Lady's office; is that correct? On somebody's computer? Do you have any knowledge of that?

Answer. Which database?

Question. The White House database which had—it's referred to as WHoDB, which had information on people who had come to the White House and when they had made visits or——

Answer. As I understand it, there was a screen in the social office or two screens in the social office which used it primarily—which used it primarily.

Question. And what was your understanding of how it was used?

Answer. To know the names of people who had attended White House events so that other people can be invited or, you know, just to have them on. I mean, I don't think it was a system different than the previous administration's system. It might have been more—more modernized. But, you know, having a database that gave you information about people who were invited to the White House and people who came to the White House, accepts, regrets, phone numbers, addresses, that kind of thing, I thought was pretty——

Mr. BALLEN. Excuse me, I'm going to object to this line of questioning. It is now 8 o'clock. At 4 o'clock, this witness was told there were two matters left, Johnny Chung and Webster Hubbell. We are going into the Back to Business Committee, other matters, the White House database. I just don't think this is fair any longer. There is no sense of proportion in either the questions or the topics, and we are just getting into entirely another topic now which God knows how long it is going to last.

Ms. COMSTOCK. I think it is going to be a fairly brief topic.

Mr. BALLEN. Nothing has been fairly brief today. I think we can all agree on that.

Mr. DENNIS. Is there a need to go into this?

EXAMINATION BY MS. COMSTOCK:

Question. Just—there is one document that we had discussed earlier today and I just wanted to—that had—this is Deposition Exhibit No. 8, which had listed the various guests and how many events they had been listed in. I was wondering if you know if any kind of information like this on who was invited and that kind of thing at the White House was ever shared with the DNC about who was invited to various events. Like information from the White House database was ever referred to or shared with anyone at the DNC to your knowledge?

Answer. No, not to my knowledge.

Question. Okay. Because we have just been discussing the Back-to-Business matters and I did want to show—this is a December 8th, '95, phone message from Mr. Chung to Evan Ryan about wanting to get cleared into the White House, saying he's on his way to the DNC and he wants to talk to you. This was the day before, apparently, that he says he got the call from Lynn Cutler.

So I just wanted to see if that refreshes your recollection at all in terms of whether he had been at the White House, if there was ever any discussions with him about Lynn Cutler might call or, you know, his presence at the White House at or around the time he says he was contacted by Mr. Cutler—I mean Ms. Cutler?

Answer. No. Says, "To Evan."

Question. Yes, the message is to Evan Ryan, not to Ms. Williams.

Answer. Okay.

Ms. COMSTOCK. We have another message that's somewhere around there but it's unclear, so I'm not going to bother with you it.

I'll make this 12/8/95 Deposition Exhibit No. 48.

[Williams Deposition Exhibit No. 48 was marked for identification.]

Ms. COMSTOCK. Let me just take a minute here. I think I may be done.

EXAMINATION BY MS. COMSTOCK:

Question. Okay. Were you aware of Mr. Chung contributing to any other groups connected with the President or First Lady, any political groups?

Answer. No.

Question. Were you aware of him contributing to any legal defense funds of any White House employees or anybody else?

Answer. No. No, no. I don't know if he contributed to the President's legal defense fund, but those records are public.

Question. Those are public. I was wondering if you have any knowledge of any people at the White House or anything like that?

Answer. No. Not mine.

Question. Are you aware of any attempts by Mr. Chung to contact individuals in the Vice President's office?

Answer. No.

Question. Were you aware of Mr. Chung attempting to try and get some credential letters from the President for a trip to China?

Answer. No.

Question. Did you ever hear anything about——

Answer. Credential letters?

Question. I guess it's——

Mr. DENNIS. Letters of introduction?

EXAMINATION BY MS. COMSTOCK:

Question. It's national security type of lingo. A letter to use when he's traveling to China or traveling overseas to——

Answer. No.

Question [continuing]. Show some bona fides of who he's connected to or anything like that?

Answer. No, I don't recall that.

Question. Did you ever learn of Johnny Chung talking about efforts that he was making to get Harry Wu, the human rights activist, released from prison in China?

Answer. Yes, at my last deposition.

Question. You had no knowledge of that at the time back in—I believe it was 1995?

Answer. I thought—I thought I'd heard something about it, but I was unable to distinguish. I mean, they showed me something, and I thought, oh, maybe I did hear about this, but I was unable to distinguish when.

Question. In other words, was it live or Memorex?

Answer. Yes.

Question. Do you recall anybody at the time, anybody from the NSC, raising what is he doing now?

Answer. No.

Question. There were concerns about Jimmy Carter going to Haiti, which is probably less concern about, but did you ever hear, what is Johnny Chung up to——

Answer. No.

Question [continuing]. Going to China and trying to say he has the President's——

Answer. No, I did not.

Question. The only knowledge you have, you aren't able to distinguish?

Answer. I'm not able to distinguish.

Question. Okay. Have you ever had anyone request any kind of credential letters for foreign travel from your office? Do you have any knowledge of what office that goes through?

Answer. Or what they would be. I've never heard of such a thing.

Question. When is the last time you have been in touch with Mark Middleton?

Answer. I don't—I don't know. I—I don't know. Probably not since his name has been in the newspaper.

Question. Were you aware of him doing any type of fund-raising overseas?

Answer. No, I didn't—I didn't know what his business was.

Question. Did you have any knowledge about him doing any fund-raising in the '96 campaign cycle?

Answer. No, no. No, I don't. Huh-uh.

Question. Did you have any knowledge of him providing any lists of supporters to anybody at the White House or the DNC?

Answer. Not that I know of, no.

Question. I don't want the record to be unclear. We had a memo earlier today that discusses him providing lists, but I think you answered about your knowledge of that, so I don't want that to be confused.

And can you place your last contact with Johnny Chung in time? At all? The past year? Or——

Answer. Oh, God, I don't know. I don't know.

Question. Were you aware of him trying to contact the White House as various fund-raising stories started coming out in the fall of '96?

Answer. No.

Question. There are a number of phone messages in November of '96 that he made phone calls to Richard Sullivan at the DNC. Do you know if he ever tried to contact anybody at the White House about anything?

Answer. Oh, no.

Question. And to your knowledge has he tried to——

Answer. Contact me? No, no.

Question. Or contact anybody prior to news reports about him?

Answer. No, not that I know of.

Question. Okay. And do you know Roger Tamraz? Have you ever met him or know anything about him?

Answer. No, I don't know him. But in my last deposition, it was brought to my attention that I was at the same party he was at once, but I don't remember him. I couldn't recognize him.

Question. That being an event in the residence with 20 or so people or something like that?

Answer. I forget what it was, but——

Question. June of '96?

Answer. I forget the date, but they said I was at the same party that he was at, and I agreed that I was at that party.

Question. Okay. So you did attend that event. You don't recall anything about Roger Tamraz?

Answer. No, huh-uh.

Question. And do you have any knowledge about Roger Tamraz trying to make contributions to the DNC?

Answer. No, I don't know who he is or what he's done. I don't know anything about him.

Question. And do you have any knowledge about any particular fund-raising that went on for the President's birthday party of last year, of August of '96?

Answer. Particular fund-raising?

Question. Any people who were involved as cochairs of events or any people that you dealt with?

Answer. I certainly know about it. My participation in the President's birthday event was to make sure that—that the entertainment would be wholesome.

Question. And were you able to attend that event?

Answer. No, I did not attend that event.

Question. So you did not run into Charlie Trie or Johnny Chung or any of those people at that event?

Answer. No, I did not.

Question. I believe that's all I have at this time.

Answer. Thank you.

Mr. BALLEN. I'll need a moment before I begin.

The WITNESS. Okay.

[Recess.]

EXAMINATION BY MR. BALLEN:

Question. Ms. Williams, I'd like to begin by thanking you. It is now 10 after 8:00 in the evening. This deposition began at 10 o'clock. We have gone pretty much

straight. We have had three 10-minute breaks and several much shorter breaks so that people could use the facilities.

Your patience has been extraordinary. Any fair-minded observer would see that you have made every possible human effort to answer questions fully and completely and to wrack your memory.

What's not reflected in the record, because it's just going to be a bare bones record of a transcript, is how when you were asked in excruciating detail about certain issues that, frankly, were a very small part of your duties you would think very hard and your facial expressions would show that you were trying to the best of your human ability to find an answer. And I want the record to reflect your extraordinary effort today. And I don't think anyone in this room would disagree with that.

And I think that's important to note for the record because records are cold things. They don't have human emotions or the human expression in them. And I think that you have made every possible effort here today.

You have had a very fine record of public service, both with this administration and prior to that, and your patience here has been extraordinary.

I also would like to note for the record that at no time was the Minority ever consulted with by the Majority as to how much time we would have to question or when we could fit that into the schedule and what would be appropriate. And so I'm very hesitant to ask you any questions to keep you one moment longer here.

Ms. COMSTOCK. I think—for the record, I think we have always had very, very brief Minority questions except on rare occasions. So I'm sorry for perhaps assuming that. But there usually hasn't—there has been very few, if any, Minority questions. But in the future we will be happy to consult you on time.

Mr. BALLEN. That would be a decided shift from past practice, because we have not been consulted as to when we may want to ask questions or what topics or how long we might have.

Ms. COMSTOCK. I think the record will reflect the interest of the Minority in asking questions.

Mr. BALLEN. Are you representing that we were consulted prior to this deposition as to what questions we might have?

Ms. COMSTOCK. You never asked to discuss it.

Mr. BALLEN. Was the—did the Majority consult with the Minority as to what questions we might have?

Ms. COMSTOCK. Did the Minority ask the majority to consult? Let's don't waste the witness' time.

Mr. BALLEN. You don't talk about wasting the witness' time when you sit here reading documents. You never consulted about our time. You began this deposition talking about Johnny Chung being the subject matter of the deposition. That didn't begin until 4:45, almost 7 hours into the deposition. This witness was dragged through extraneous matters in great detail before you even got to the main matter.

The Minority was never consulted as to—and I repeat—never consulted at any time as to what questions it may want to have for the witness. And, you know, it's just——

To say that what we've asked in the past with different witnesses is totally irrelevant to that fact that we were never consulted and the timing of this was never consulted and the scope went on and the witness' patience with this process—frankly, if I were the witness—I mean, I'm just astounded by her extraordinary patience.

EXAMINATION BY MR. BALLEN:

Question. In that regard, Ms. Williams, I'd like to ask a couple of questions. This is not the first time you have had to testify about these matters, is it?

Answer. No.

Question. Did you testify in a deposition in the Senate?

Answer. Yes, I did.

Question. How long did that deposition last?

Answer. 6:30——

Mr. DENNIS. 10:30 to 6:30. Something like that.

EXAMINATION BY MR. BALLEN:

Question. 10:30 to 6:30? Any other investigative bodies?

Answer. One night at 8 p.m. the FBI came to my door and questioned me about it.

Question. Did these questions, Senate and the FBI, substantially overlap with the kind of questions that you received today?

Answer. Yes.

Question. And you spent time preparing for this deposition and the Senate deposition; is that a correct assumption?

Answer. Yes.

Question. And can you estimate how much time you spent preparing for depositions and collecting documents and——

Answer. I only keep time in billing hours. I'm sorry.

Question. But apart from the time, let me ask you this question: There's an element of worry and stress and concern, is there not? I mean, I know you are working hard to answer each question diligently, but there's a stress factor involved in this, isn't there?

Answer. There's always a stress factor involved in anything where there is an investigative body involved. Yes.

Question. You mentioned the billing hours. Have you incurred expenses in the nature of all these requests that you have received and testimony that you have given?

Answer. Yes.

Question. Can you estimate how much expenses have been involved?

Answer. On this particular investigation, I don't know. On all of them, a little more than a quarter of a million dollars.

Question. A quarter of a million dollars?

Answer. A little more than that.

Mr. DENNIS. That's probably conservative.

EXAMINATION BY MR. BALLEN:

Question. That's probably conservative? That's a substantial burden, is it not?

Answer. If it is you don't have any money at all.

Question. Not only is there a huge expense involved, but there's the time and the effort; is that fair to say?

Answer. I'd say that's fair.

Mr. BALLEN. I have nothing further. Thank you.

Mr. DENNIS. Thank you.

Ms. COMSTOCK. I just want—let the record reflect that on a number of occasions, on Mr. Ickes' documents and some of the other matters, we did confer—sometimes off the record, sometimes on—as to whether or not the witness had particular knowledge on that. And we did—we shortened, I think, a number of Mr. Ickes' documents. Even though the witness had been cc'd on a lot of them, we spent a fairly brief amount of time on that. So there were certainly attempts on the Majority's side to shorten the areas that may have previously been gone over and the witness did not have knowledge about. So——

Mr. BALLEN. No, I completely disagree.

Ms. COMSTOCK.—I appreciated the witness' counsel in assisting us with that, because it made it helpful and able to discuss with him those matters so that we could shorten sometimes a number of different areas we discussed.

Mr. BALLEN. I am going to, for the record, completely disagree with that characterization. There was one moment, after 20 minutes of questioning on the documents the witness knew nothing about, at counsel's request we went off the record and counsel off the record said, is it really necessary to continue questioning on documents this witness is unfamiliar with? Because she's going to repeatedly give "I don't know" answers to them, and——

Ms. COMSTOCK. Is that your characterization of what we——

Mr. BALLEN. Can I finish my sentence?

Ms. COMSTOCK. That is not what I said. I asked the witness if there was knowledge on particular matters or if we could shorten things. I don't think characterizing or mischaracterizing what I said is necessary at this point. Why don't we just end the deposition?

Mr. BALLEN. No, no, I'm not finished. I was interrupted in the middle of a sentence. I've never had the discourtesy to interrupt the Majority counsel in the middle of her sentence.

Ms. COMSTOCK. Only to interrupt entire questions.

Mr. BALLEN. There, you just did it again. And that is not what occurred off the record, and the record should reflect that is not what occurred. What occurred is that after 20 minutes of questioning on Harold Ickes' documents the witness didn't know about, we went off the record and counsel——

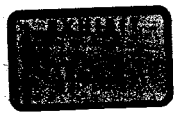
Ms. COMSTOCK. The witness did have some testimony on those things, and I think the record will reflect it. And I don't think you need to characterize her knowledge or the lack thereof. The record will speak for itself.

[Whereupon, at 8:24 p.m., the deposition was concluded.]

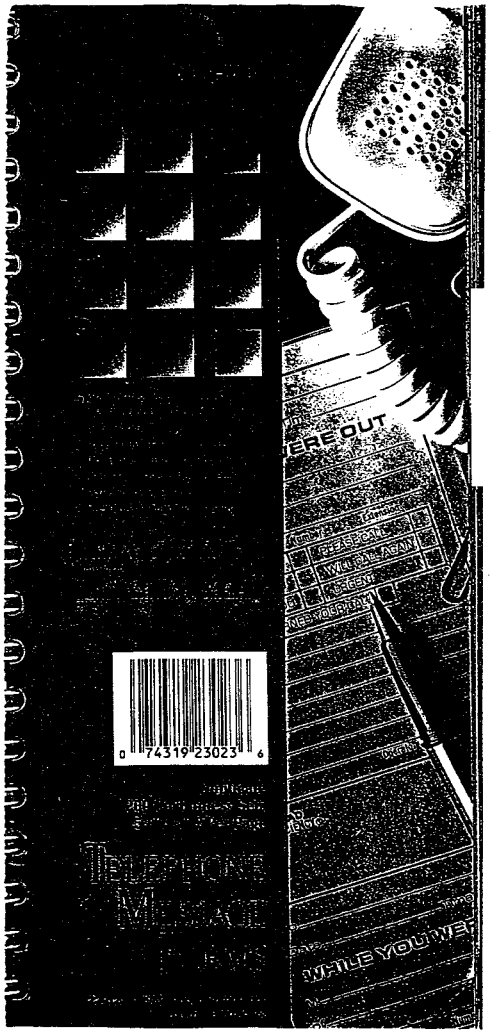
[The exhibits referred to follow:]

DNC
Personnel Related to White House Support

		Annual Salary
White House Staff paid by the DNC		
Andersen, Karen	WH Political	30,000
Atta, Maureen	WH Political	22,500
Bachar, Steven	Advance	42,000
Grote, Sara	First Lady	22,000
Hanlin, Kirk	Advance	42,000
Trahern, Joseph	WH Political	30,000
		188,500
VP Liaison		
Alpert, Dennis		80,000
Landgarten, Susan		25,000
Teague, Jeff		50,000
Van Giesen, Kris		45,000
		200,000
Arkansas Office		
Dixon, Lynda		40,000
Salmon, Mary		25,000
Vinson, Rebecca		15,000
Whitacre, Susan		45,000
Young, Valencia		25,000
		150,000
Health Care Media Campaign Staff		
Booth, Heather		54,000
Bua, Jon-Christopher		42,500
Diresta, Brett		24,000
Holton, Dwight		42,000
McMarugal, Jason		20,000
Woolley, Barbara		40,000
		222,500
Other		
Gist, Harold		65,000
McDonald, Cecil		25,000
Peters, Darren		40,000
Willis, Carol		90,000
		220,000



CGRO-11946
Req.5/28/97



COPY
from ORM
5618

EXHIBIT
MD-2

EOP 059044

To Maggie

Date 5/22 Time 6:45

WHILE YOU WERE OUT

M. Adam

of LeonPanetta

Phone 6-6797

Area Code Number Extension

TELEPHONED	✓	PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Mtg. 2:00-2:30 Wed 5/24
CCSs rptue re: DNC
employees working at WH.

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

EOP 059045

DNC Chairman Restructures Senior Staff

Wilhelm Responds to Criticism After Democrats Lose 3 Key Races

By Dan Balz
Washington Post Staff Writer

Democratic National Committee Chairman David Wilhelm has restructured the senior staff at party headquarters to prepare for this year's midterm elections and to respond to criticism of weakness in his operation.

Wilhelm, according to several Democrats, is expected to tap Terrence McAuliffe to shore up the party's finances and plans to name Don Sweitzer as assistant for political affairs, Ed Lazarus as assistant for strategic communications and Minyon Moore as head of voter education and public liaison.

The changes complete a virtual clean sweep of senior-level positions at the DNC, beginning late last year with the decision to hire as executive director Debra DeLee, who had been director of government affairs at the National Education Association.

"This is a strong and capable and experienced campaign team and puts us in good shape for the '94 election cycle," Wilhelm said.

Wilhelm acted after the Democrats lost three key elections in November—the Virginia and New Jersey gubernatorial races and the New York mayoral race—and congressional Democrats expressed fears that the DNC was not ready for this year's midterm elections.

Sweitzer is a former DNC finance director with strong ties to organized labor. In 1992 he was an adviser to the presidential campaign of Sen. Tom Harkin (D-Iowa). Lazarus is a partner in the Democratic polling firm Mellman-Lazarus-Lake. Moore will expand her current DNC role.

Wilhelm also intends to recommend that McAuliffe, a Washington businessman, be named as finance chairman, an elected position. That cannot happen officially until the March meeting of the DNC in Cleveland. Currently head of the party's business council, McAuliffe was finance chairman for the 1988 presidential campaign of Rep. Richard A. Gephardt (D-Mo.).

Democratic sources said that despite the DNC's success in raising money in 1993, the party is several million dollars in debt, and one Democrat described "turmoil in the donor community" because of hard feelings among major contributors, who have complained that they have been ignored by the Clinton White House.

Other appointments will include Bobby Watson, former aide to Sen. Charles S. Robb (D-Va.), and Martha Phipps, a veteran of the Clinton presidential campaign, as deputy executive directors. Craig Smith, who has been political director, is expected to move to a job at the White House.

BIG SPENDERS

The Center for Responsive Politics has cited 64 individuals with violating the $25,000 annual cap on political contributions. The following individuals contributed more than $50,000 in 1992.

Name	City	Company and Title	Amount
Angelo Parisi	New Rochelle, N.Y.	Retired	$66,242
William C. Mow	Los Angeles	Chairman and CEO, Bugle Boy Industries	$66,100
Charles A. Intriago	Miami	Attorney, publisher, Alert International Inc.	$52,500
D. Lloyd Wilson	Cozad, Neb.	Retired rancher	$52,000
Edmund A. Stanley Jr.	Oxford, Md.	Retired	$51,700
William R. Hambrecht	San Francisco	Chairman, Hambrecht & Quist, investment banking	$51,200
John D. Murchison	Dallas	CEO, J.D. Murchison Interests investments; chairman, Murchison Oil and Gas	$51,000
David Packard	Los Altos, Calif.	Chairman, Hewlett-Packard	$50,450
John A. Gabriel	Santa Fe Springs, Calif.	President, chairman, Gabriel Enterprises Inc.	$50,340
Abe Pollin	Landover, Md.	Owner, Washington Bullets and Capitals	$50,200

Mack
[illegible]
What is this about?
Who has been ignored
Let's nail down the specifics
We sure gave them [illegible]
B

MACK -
What's this all
Who's been
ignored? Let
nail down the
Specifics. We
sure gave the
B

SUBSTITUTION

THE PRESIDENT HAS SEEN

EOP 052397

260

TO: MARTHA PHIPPS

IN ORDER TO REACH OUR VERY AGGRESSIVE GOAL OF $40 MILLION THIS YEAR, IT WOULD BE HELPFUL IF WE COULD COORDINATE THE FOLLOWING ACTIVITIES:

1. Two seats on Air Force I and II trips.
2. Six seats at all private dinners.
3. Six to eight spots at all White House events (ie....Jazz Fest, Ceremonies, Official visits.....)
4. Official delegation trips abroad.
5. Better coordination on appointments to Boards and Commissions.
6. White House mess priviledges.
7. White House residence visits and overnight stays.
8. Guaranteed Kennedy Center Tickets (at least one month in advance.
9. Six radio address spots
10. Photo opportunities with principles.

NOTE: Any money above and beyond the $40 million goal would require two additional Presidential events outside of Washington, DC.

CGRO-1670
Req. 2/3/97

Memorandum

May 5, 1994

TO: Ann Cahill

FR: Martha Phipps

RE: WHITE HOUSE ACTIVITIES

In order to reach our very aggressive goal of $40 million this year, it would be very helpful if we could coordinate the following activities between the White House and the Democratic National Committee.

1. Two reserved seats on Air Force I and II trips
   Contact: Ricki Seidman/Mike Lufanio

2. Six seats at all White House private dinners
   Contact: Ann Stock

3. Six to eight spots at all White House events (i.e. Jazz Fest, Rose Garden ceremonies, official visits)
   Contact: Ann Stock

4. Invitations to participate in official delegation trips abroad
   Contact: Alexis Herman

5. Better coordination on appointments to Boards & Commissions

6. White House mess privileges
   Contact: Patsy Thomason

7. White House residence visits and overnight stays
   Contact: Ann Stock

8. Guaranteed Kennedy Center Tickets (at least one month in advance)
   Contact: Ann Stock

9. Six radio address spots
   Contact: David Levy

10. Photo opportunities with the principles

11. Two places per week at the Presidential CEO lunches
    Contact: Alexis Herman

EOP 036287

12. Phone time from the Vice President
    Contact: Jack Quinn

13. Ten places per month at White House film showings
    Contact: Ann Stock

14. One lunch with Mack McLarty per month
    Contact: Mark Middleton

15. One lunch with Ira Magaziner per month
    Contact: Marge Tarmey

16. One lunch with the First Lady per month
    Contact: Maggie Williams

17. Use of the President's Box at the Warner Theater and at Wolf Trap.
    Contact: Ann Stock

18. Ability to reserve time on the White House tennis courts

19. Meeting time with Vice President Gore
    Contact: Jack Quinn

DEMOCRATIC * NATIONAL * COMMITTEE

David Wilhelm, Chairman

Do you want me to pursue #1 w/ Bill #2 w/ Hillary & Cabinet #3 Handle

Run it by me

January 5, 1993

MEMORANDUM TO NANCY HERNREICH
FROM: TERRY McAULIFFE
NATIONAL FINANCE CHAIRMAN

During my recent meeting with the President, we discussed the following projects:

1. I would like three dates over the next month, about one week apart, for breakfast, lunch or coffee with the President and about twenty of our major supporters. The purpose of these meetings would be to offer these people an opportunity to discuss issues and exchange ideas with the President. This will be an excellent way to energize our key people for the upcoming year. We would need one hour of the President's time for each of these meetings. These individuals will come in to Washington from across the country.

2. The following individuals are our ten top supporters: — GIVERNEDTS

   John Connelly
   Carl Lindner
   Skip Hayward
   Miguel Lausell
   Arthur Coia
   Finn Casperson
   Paul Montrone
   Larry Hawkins
   Stan Shuman
   Ernie Greene

3. Finally, if there are any opportunities to include some of our key supporters in some of the President's activities, such as golf games, morning jogs, etc., it would be greatly appreciated.

Thank you for your assistance.

CGRO-1569
Req. 2/3/9

Democratic Party Headquarters • 430 South Capitol Street, S.E. • Washington, D.C. 20003 • 202.863.8000 • FAX: 202.863.8[illegible]
Paid for by the Democratic National Committee. Contributions to the Democratic National Committee are not tax deductible.

Yes, pursue all 3
and promptly -
and get other names
at 100,000 or more
50,000 or more
cc: Harold L Paneta Webster
Ready to start overnight
Night away -
Give me the top
10 list back
along w/ the 100, 50, etc,

3 and promptly -
and get other
at 100,000 or more
50,000 or more -
cc: Hickey, L Paneta, D Wilson
Ready to start overnight
night away -
give me the top 10 list
along w/ the 100, 50 etc.

CGRO-1570
Req. 2/3/97

Overnight Guests In Response to Request

Name	Date(s) of Stay
John E. Connelly	2/9/95
Audree Wirginis	2/9/95
Carl H. Linder	2/9/95
Bruce and Julie Ratner	3/15/95
Steven J. Green	3/19/95
Ron Burkle	3/25/95
Barbara and Steven Grossman	4/20/95
Norma and Olan Mills	4/20/95
Carl Spielvogel and Barbaralee Diamondstein-Spielvogel	4/27/95
Steven Rattner	7/26/95
Alan M. Leventhal	7/27/95
Len Barrack	7/28/95
Steven Spielberg	8/2/95
Lewis Rudin	9/18/95
Ted Danson	10/26-29/95, 4/25/96, 6/4-5/96
Walter Kaye	12/8/95
Lenl May	12/8/95
Terence McAuliffe	12/15/95
Richard Friedman	12/18/95
Alan J. And Susan Patricof	2/1/96
Stanley S. Shuman	2/1/96
Eli Broad	3/27/96
Ray Iranl	3/27/96
John A. Catsimatidis	3/27/96
Frieda and Roy L. Furman	3/27/96
Paul M. and Sandra Montrone	4/2/96
Beth E. and Ronald I. Dozoretz	4/2/96
Steven P. Jobs	4/2/96
Dirk Ziff	4/2/96
Fred P. Hochberg	4/11/96
Lillian Vernon	4/11/96
Trudy and Paul L. Celas	5/9/96
Angelo K. Tsakopoulos	5/9/96
Safia Tsakopoulos	5/9/96
Joan and William Brandt	6/13/96
Iris Cantor	7/21/96
Ira H. Leesfield	8/21/96
Richard L. Mays	9/26/96
Norma K. Asnes	10/1/96
Alan D. Solomont	10/19/96
Leslie Moonves	12/8/96

EXHIBIT
MW-7

THE WHITE HOUSE
WASHINGTON

MEMORANDUM

DATE:	APRIL 21, 1994
TO:	MARK MIDDLETON
FROM:	ANN STOCK
RE:	POTENTIAL GUESTS
CC:	MAGGIE WILLIAMS PHIL LADER

I think our meeting on Thursday was very productive. Thank you for bringing a list with you of key fundraisers. It gives us an opportunity to see exactly who has been invited and who hasn't.

I had Helen run a check on the attached list. Beside each name are four columns: invited, accepted, regretted and dinner.

As you can see, there are a number of people who haven't been invited to anything. Additionally, not many people have been invited to either a small dinner or an official dinner.

If you can provide me with addresses, we can start to correct this situation immediately. Also, per our discussion, each Friday, I will send you guest lists for the following week so that you and Phil can identify any key fundraisers who are in town. That will help us to be proactive in arranging programs, meetings, breakfasts, and lunches with key White House staff.

I look forward to working more closely with you on this but do need to reiterate that people can only be invited to events when we actually know who they are and how to find them.

Also, please check Phil Lutznick. I think his name is Phil Klutznick from Chicago, who has given $30,000.

EXHIBIT
MW-8

EOP 056609

(sp. = sponse) May 1992 – Jan. 1, 1993

Uninvited List

"Victory 1992"

		INVITED	ACCEPTED	REGRETTED	DINN
Frederick R. Adler	$116	4, sp. 1	2	2, sp. 1	stay w
Norman Foster	$40	—			
Daniel Amor	"	—			
Bruce Lee	$145	—			
M. Bernard Aidenoff	$25.65	—			
Adam M. Albright	$25	—			
Thomas Burr	$25	—			
Barbara C. Anthony	$100	1, sp 1		1, sp. 1	
Jeffery Peck	$77	1, sp. 1	1, sp. 1		
Robert J. Healy	$46.30	—			
Louis Moore Bacon	$30	1 (10/14)	no record	no record	
Daniel Berger	$105	1	1		
Howard P. Berkowitz	$85	1 (10/14)	no record	no record	
Bernard D. Bergreen	$50	2	1 N/r 10/14	no record (10/14)	
Michael R. Bloomberg	$25	—			
Barbara B. Blumenthal	$50	—			
Michael Blumenthal	$66.15	2	1 (n/r 10/14)	no record (10/14)	
Peter F. Borish	$25	—			
Crandall C. Bowies	$31.30	5, sp 17	4, sp. 15	1, sp. 2	7/29 small dr
Lawrence B. Buttenwieser	$27	1 (10/14)	no record	no record	
Evelyn Chambers	$99	1		1	
Merle C. Chambers	$228	6, sp. 3	5, sp. 2	1, sp. 1	9/11 sme die
Chevy Chase	$30	3, sp. 3		3, sp. 3	inv., kor dun
Phil Cavanaugh	$55.64	4	3 (n/r 10/14)	no record (10/14)	
David H. Cofrin	$30	1	1		
Mary Ann P. Cofrin	$59	—			
Marshall S. Cogan	$100	2, sp. 2		2, sp. 2	

EOP 056610

		INVITED	ACCEPTED	REGRETTED	DINNER
Grover Connell	$100	—			
B.W. Chassin	$25	—			
E.W. Cook	$30	—			
William O. Cooley	$26	—			
Archibald Cox, Jr.	$30	—			
Herbert H. McAdams, II	$100	1		1	
Hugh F. Culverhouse	$25	—			
Wallace C. Dayton	$51	—			
John Earhart	$25	—			
Edward M. Gabriel	$25	1	1		
Lawrence J. Ellison	$95	2	no record 10/14	1, (n/r 10/14)	
M/M Edward E. Elson	$120.06	2, sp 1	2, sp. 1		
Paul J. Elston	$32.20	2	1, (n/r 10/14)	no record 10/14	
Saul A. Fox	$25	—			
Samuel Frankel	$25	—			
Samuel Fried	$47.50	9, sp. 3	5, sp. 2	4, sp. 1	state luncheon
Patricia Frost	$40	—			
Richard C. Fuisz, MD	$130	2	1	1	
Sheila M. Fulton	$25	—			
Jonathan Orlaff	$26.65	—			
Dorothy & Bill Gerson	$25	(Dorothy) 1	1		
Ann G. Getty	$50	2	1, (n/r 10/14)	no record 10/14	
William B. Ginsberg	$25	1	no record	no record	
Gary Goldberg	$30	4, sp 1	1	3, sp 1	
Murry H. Goodman	$25	1, sp 1	1, sp. 1		
Barney J. Gottstein	$25	1	no record	no record	
Kenneth A. Jacobsen	$69	1	1		
Steven Grossman	$52.24	5, sp. 3	3, sp. 1	2, sp. 2	10/14/93 prior dinn
J David Smith	$25	?			
H. Peter Guber	$80.50	3, sp. 2	2, sp. 2	1	11/23 Korean dinn
John A. Harris, IV	$27	—			

EOP 056611

		INVITED	ACCEPTED	REGRETTED	DINNERS
Arthur M. Goldberg	$25	4, sp. 1	1, (n/r 10/14)	2, sp. 1 (n/r 10/14)	
Robert Hefner, III	$30	3	1	2	
Joe M. Henson	$48	2, sp. 1	1, sp. 1	1	
Robert E. Juliano	$37.50	1	1		
Neil S. Hirsch	$100	1	1		
T David Hodgkinson	$60	—			
Dustin Hoffman	$25	—			
Mr. Wen-Jen Huang	$30	—			
Dr/M C.J. Wang	$100	1, sp. 1	1, sp. 1		
Joseph Ruggiero	$100	2	2		
Robert N. Elkins	$25	2	2		
Jeffrey A Knight	$25	—			
Jon Peters	$80	1 (10/14)	no record	no record	
Paul Tudor Jones	$110	1, sp. 1		1, sp. 1	
Robert Kaplan	$25	2, sp. 1	2, sp. 1		
Jeffrey C Keil	$37.50	—			
Randall M Klose	$26.30	—			
Philip M Lutznick	$30	—			
Robert P Kogod	$30	6, sp 6	5, sp. 5	1, sp. 1	
Nathan Landow	$37.50	4, sp. 2	4	sp. 2	
M Thomas Lardner	$25	2, sp. 2	1, sp. 1	1, sp. 1	
Joanna Lau	$25	—			
Miguel D Lausell	$36	2, sp. 1	2, sp. 1		
William S Lerach	$100	5, sp. 1	3, sp 1 (n/r 10/14)	1 (n/r 10/14)	dinner 12
Raymond J Lesniak	$50	2, sp. 1	no record (10/14)	1, sp. 1 (n/r 10/14)	
Laurence W Levine	$40	—			
James Goodman, MD	$66	2	1	1	
Richard A Hayward	$100	2, sp. 1	1, sp. 1 (n/r 10/14)	no record 10/14	
Jean F Mason, III	$80	1	1		
Bernard F Master	$25	2	2		
Susan M Master	$25	2	2		

EOP 056612

		INVITED	ACCEPTED	REGRETTED	DINNER
Michael McIntosh	$25	1	1		
John G Heimann	$50	2, sp. 1	1, sp. 1	1	
Olan Mills, II	$30	2, sp. 1	no record 10/14	1, sp. 1 (n/r 10/14)	
Leonard Kriss	$25	—			
Harold J Moffie	$32.50	1, sp. 1	1, sp. 1		
Robert Morgado	$25	—			
Mario M Morino	$50	—			
Morton Bahr	$100	13, sp. 4	12, sp. 3	1, sp. 1	resigned to dinner
Debra Delee	$173.78	18	18		
Elva O'Brien	$32.25	—			
Robert McGee Robert C. or M.?	$71				
Dwight Opperman	$100	2	no record 10/14	1 (no record 10/14)	
Morris Ostin	$25	—			
Tom Young Mayor or Fox News?	$25				
Donald Duncan Phillips? if so,	$29.90	1, sp. 1		1, sp. 1	
Philip W Pillsbury, Jr	$25.68	2, sp. 2	2, sp. 2		
Sarah Conway	$25	—			
John M Quinn	$45	5, sp. 5	5, sp. 5		
Madeline H Russell	$29	1		1	
Richard E Halperin	$139.20	1	1		
Edward M Ricci	$29	4, sp. 1	3, sp. 1	1	
Rick Diegel	$50	2, sp. 1	2, sp. 1		
Mark Robinson	$50	1	no record 10/14	no record 10/14	
Christopher E Ross	$50	1		1	
Jon W Rotenstreich	$30	—			
Madeleine H Russell	$50	~~—~~			
Thomas L Safran	$25	—			
Bruce Sagan	$25	—			
Richard Schibell	$27.50	1	1		
Margaret Schink	$100	1	no record 10/14	no record 10/14	
Raymond F Schoenke, Jr	$29	1, sp. 1	1, sp. 1		

EOP 056613

		INVITED	ACCEPTED	REGRETTED	DINNER
M Mac Schwebel	$50	—			
Geri Palast	$77.15	3, absence no Rich's sec.	4		
Terry Semel	$35	—			
David E Shaw	$70	2, sp. 1	2, sp. 1		
R Edwin Shelton	$25	—			
Rena M Shulsky	$25	—			
Jay Stein	$100	8, sp. 2	3, sp. 2 (n/r 10/14)	4 (n/r 10/14)	regretted state line
David Steiner	$56.50	2, sp. 2	2, sp. 2		
David Stern	$32.50	—			
Bruce Stern	$50	7, sp. 2	2 (no record 10/14)	4, sp. 2 (n/r 10/14)	regretted state line
Stephen C Swid	$75	5, sp. 1	2, sp 1 (n/r 10/14)	2 (no record 10/14)	3/18/94 small dinner
Thomas McKinney	$25	—			
Rachelle Horowitz (connected with Tom Donahue)	$53.50	13, sp. 9	10, sp. 6 (n/r 10/14)	2, sp. 3 (n/r 10/14)	6/10 10/1 Binne
Richard Jenrette	$31.25	1		1	
Vincent Bartolotta	$25	—			
Susie Tompkins	$95	4	1 (no record 10/14)	2 (no record 10/14)	
Barry Diller	$40	4	1 (no record 9/30)	2 (no record 9/30)	regretted 6/22 came 6/24 regretted sta. bum
Bruce Lee – See front page	$50	—			
Steve Powell	$35.03	—			
Lillian Vernon	$25	6	4	2	
Margery Tabankin	$423.90	1	no record 10/14	no record 10/14	
Robert B Wallace	$35	—			
Alice Walton has been honorguest	$100	1, sp. 1	1	sp. 1	
Bert Wasserman Robert?	$25	—			
Walter H Weiner	$50	—			
Frank G Wells 1, sp. 1	$25	(Dunsmuir)		1, sp. 1	
Malcolm H Wiener	$80	—			
Larry Weissberg	$60	2, sp 2	1	1, sp. 2	
Alejandro Zaffaroni	$32.50	1	no record 10/14	no record 10/14	
Lida Zaffaroni	$31.50	—			

Note: People with a ✓ next to their name appear on the 1st List Victory 1992.

DNC 1993

		INVITED	ACCEPTED	REGRETTED	DINNERS
✓Norman Foster	$25				
✓Daniel Amor	"				
✓Bruce Lee	$25				
John Angelides	$25	—			
Martin Sorkin	$25	—			
✓Arthur Goldberg	$30				
Lee Hillman	$30	—			
Gary Perkinson	$265	2, sp. 1	2, sp. 1		
✓Howard P Berkowitz	$25				
Frank Moore	$30	6, sp. 3	6, sp. 3		7/2 dinner 12/1 dinner
Bill Brandt	$30	1	1		
Joe Chapman Joseph? if so,	$35	4	3	1	
✓Phil Cavanaugh	$50				
Steve Berlin	$25	—			
Stephanie Biddle	$25.25	—			
Loretta Bowen	$40	4	2	2	regretted 12/1 dinner
Stanley Hill	$26.50	4, sp. 2	4, sp. 1	sp. 1	came 2/23
Dr. Ben Armstrong	$50	2, sp. 2	2, sp. 2		12/1 dinner
Ann L Pride	$25	1	1		
D Jeffrey Hirschberg	$90	6, sp. 2	6, sp. 2		12/1 dinner
George Tagg	$25	3	2	1	
Dan Fabrizio	$30	—			
Harold F Koegler	$25	—			
Ronald Harris	$25	—			
Stephen A Herman	$25	2	2		
John W Daniels	$30	—			
Steve Hyjek	$25	2, sp. 1	2, sp. 1		
Rick Diegel	$45.50	2, sp. 1	2, sp. 1		
Dr. Ben Armstrong	$50				

EOP 056615

	?	INVITED	ACCEPTED	REGRETTED	DINNER
Richard Johnston, Jr p°8 11/20/84	$50	1	1		
✓Paul Tudor Jones	$40				
Jack Curran 4, sp 2	$25 (+ $25 ?)		4, sp. 2	-	12/1 dinner
✓William S Lerach	$150				
Sam Freed	$25	1		1	
John Tisch	$25	5, sp. 2		5, sp. 2	regretted state lunc
Rich Michalski	$50	2	1	1	
Don A Madden Jr. or Sr?	$50.40	See below			
Robert J Cestola	$25	—			
Andrew R Morse	$25	1	1		
Linda F Murphy	$30	—			
✓Debra Delee	$113.20				
✓Paul Montrone	$40				
✓Robert McGee	$27				
Thomas Kramer Florida?	$25	2	1	1	
Alfred R Pierce	$100	2	1	1	12/1 dinn
Ray Braunstein	$70	3, sp. 2	2, sp. 1	1, sp. 1	12/1 dinn
Ray Braunstein	$30	↗			
Harry A Jacobs, Jr	$30	—			
Oswaldo Kosta	$25	—			
✓Richard E Halperin	$50				
Daniel Rose	$25	3, sp. 1	2	1, sp 1	regretted 4/11 dinn
Steven Roth	$25	1	no record (10/7)	no record (10/7)	
Terry Turner	$25				
John Sweeney	$84.50	13, sp. 4	10, sp. 3 (n/r 3/24/13)	2, sp 1 (n/r 3/24/13)	regrett. 12/1 din
J M Bernhard	$25	—			
Beatrice Snyder	$25	—			
Sylvester Stallone	$30	—			
✓David Stern	$25				
✓Stephen C Swid	$25				
Joe Mangone	$27	2	no record 10/14	1 (n/r 10/14)	
Don Madden Sr.		6, sp 4	6, sp 4		12/1 dinne.

EOP 056616

		INVITED	ACCEPTED	REGRETTED	DINNER?
Bill Banig	$30	3, sp. 2	3, sp. 2		
John Sodolski	$32.40	2	1	1	—
Gerard Lederer	"	2	2		
Sam Dawson	$100	4, sp. 3	3, sp 1	1, sp. 2	regretted 12/1 dinner
i have ? → Kevin Smith need more info	$25				
Patty Krallinger	$25	—			
Mark Weinstein	$25	1	1		
Rarmond C Skuse	$25	—			
✓Frank Moore	$30				
✓Malcolm H Wiener	$25				

Please let me know if any of this needs any explanation or if you need any other information!

Thanks,
Helen Dickey
6-7707

(most of the people with only 1 invite were invited to the big 10/14 event.)

(Also, some may have been here more, according to sponsor, such as Crandall Bowles)

EOP 056617

17 May 1996

MEMORANDUM TO LEON PANETTA
EVELYN LIEBERMAN

From: Harold Ickes (HI)

Re: Marsha Scott
VIP operation at the Democratic National Committee

On 15 May, the President approved the following with regard to Marsha Scott and with regard to the VIP operation at the Democratic National Convention.

These recommendations are made with the understanding that over the past 3 years a sophisticated process, involving several key people, has evolved at the White House for ensuring contact and follow up with friends and key political and financial supporters of the President and the First Lady.

For example, Maggie Williams and Ann Stock manage a number of functions in connection with the Residence, invitations to Camp David, etc; Nancy Hernreich, working with Carolyn Huber, Debbie Schiff, Rebecca Cameron, and others, are responsible for a broad range of matters, including personal friends of the President and First Lady. In addition, (a) the Chief of Staff's office handles seating on Air Force I; (b) Jodie Torkelson, through Melinda Bates, oversees White House tours; (c) the White

House Political Department handles political/fundraising coffees and other political type events with the President; and, with Nancy Hernreich, OPL, Cabinet Affairs, Intergovernmental Affairs, and other departments, coordinates access to the President when he is on trips; (d) Debra DeLee, handles access to the National Convention and related activities; (e) Democratic National Committee (through Doug Sosnik/Karen Hancox), handles access to DNC events; (f) Department of Interior, deals with special non White House/EOP tours and events.

Although early on there undoubtedly were a number friends and other political and financial supporters who may not have received the attention and follow up they should have (or at least thought they should have), given the close and much more effective coordination among the political and other departments of the White House, with Nancy Hernreich, the Social Office, etc., it appears that few friends and other political/financial supporters are not being "taken care of" in appropriate ways. Unfortunately, there will always be a few people who "fall through the cracks" of any system, and reasonable steps to reduce this to the smallest number possible should be taken.

It is, however, very important that the existing system continue to function smoothly and not be disrupted.

Marsha is

REDACTED

EOP 036086

REDACTED

Therefore, Marsha will continue to

b) insure that the President's supporters are involved in fundraising activities to the extent possible; c) while at the White house, attend political fundraising coffees/events, and certain other events, as determined in consultation with Evelyn Lieberman and Harold Ickes, and handle follow up with attendees.

Any friend or supporter of the President who feels overlooked or not attended to in the appropriate way will be referred by Marsha to Nancy Hernreich, Ann Stock or other appropriate person in the White House for follow up.

Marsha and her assistant, Wendy Heistad, will be transferred from the political department, where she is currently located, and will henceforth report directly to Harold and Evelyn.

She and Wendy will be relocated from OEOB office 115 to OEOB office 166.

While on the White House staff, she will have appropriate access to the White House database but only in connection with her official duties. The information in the database cannot be

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Dr. Sue Bailey **SPOUSE:**

TITLE: Physician

COMPANY:

ADDRESS: Bethesda, MD

PHONE: w (202) 496-4862, h

ASST NAME:

CONTRIBUTOR HISTORY: $3,250 in 1995, $10,250 in 1994, $12,000 in 1993.

REASON FOR CALL: Ask to contribute an additional $50,000 for the DNC Media Fund.

ADDITIONAL NOTES: Sue is a Clinical Psychiatrist. Formerly, she served as Deputy Assistant Secretary for Health Affairs at DoD. She resigned this position last June to work with the re-elect committee on women's fundraising. Her husband, Alex Mendel, is the next CEO of AT&T. She is a former co-chair for the WLF. She hosted an event with Tipper Gore in her home in 1993.

CALL RESULTS:

Confidential Information

DNC 3236934

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Ann or Jerome Fischer

TITLE:

COMPANY:

ADDRESS:

PHONE:

ASST NAME:

CONTRIBUTOR HISTORY: They made a large contribution to the Virginia Kelly Foundation. They are the founders of Nine West Apparel and Shoe company. Ann is extremely supportive in cancer research organizations.

REASON FOR CALL: Ask Ann or Jerome to contribute $50,000 for the DNC Media Fund.

ADDITIONAL NOTES:

CALL RESULTS:

Confidential Information

DNC 3236935

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Mary Ann Cofrin **SPOUSE:**

TITLE:

COMPANY:

ADDRESS: Florence, MA

PHONE:

ASST NAME:

CONTRIBUTOR HISTORY: $59,000 in 1992; has not contributed since then.

REASON FOR CALL: Ask Mary Ann to contribute $50,000 for the DNC Media Fund.

ADDITIONAL NOTES: Her brother, David, and sister, Gladys, have both contributed to the DNC this year. Mary Ann is an active supporter of EMILY's List.

CALL RESULTS:

Confidential Information

DNC 3236936

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Ayse Kenmore (pronounced I sha) **SPOUSE:** Robert

TITLE:

COMPANY:

ADDRESS: San Francisco, CA

PHONE:

ASST NAME:

CONTRIBUTOR HISTORY: $200,000 in 1992; she and her husband Robert have not contributed since then.

REASON FOR CALL: Ask Ayse to contribute $100,000 for the DNC Media Fund.

ADDITIONAL NOTES: Ayse is in Washington next week for the AIDS conference. She has been to a number of events at the White House.

CALL RESULTS:

Confidential Information

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Susan Manilow **SPOUSE:**

TITLE:

COMPANY:

ADDRESS: Chicago, IL

PHONE:

ASST NAME:

CONTRIBUTOR HISTORY: $1,000 in 1995, $1,000 in 1994.

REASON FOR CALL: Ask Susan to contribute $50,000 for the DNC Media Fund.

ADDITIONAL NOTES: Susan is involved in the arts in Chicago and raised a substantial amount for the 1992 Clinton/Gore campaign. She also serves on the Vice President's Residence Foundation.

CALL RESULTS:

Confidential Information

DNC 3236938

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Denise Rich SPOUSE:

TITLE:

COMPANY:

ADDRESS: New York, NY

PHONE:

ASST NAME:

CONTRIBUTOR HISTORY: $75,000 in 1995, $107,000 in 1994, $110,000 in 1993

REASON FOR CALL: Ask to contribute an additional $50,000 for the DNC Media Fund.

ADDITIONAL NOTES: Denise has committed to contribute an additional $50,000 in the beginning of next year. Please ask her to send her additional contribution this year. Denise is interested in hosting a fundraisng event at her home for the DNC. She is a grammy nominated songwriter.

CALL RESULTS:

Confidential Information

DNC 3236939

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: David Mandelbaum SPOUSE:

TITLE: Attorney

COMPANY: Mandelbaum & Mandelbaum

ADDRESS: West Orange, NJ

PHONE: w (201) 325-0011,

ASST NAME:

CONTRIBUTOR HISTORY: $25,000 in 1994, $10,000 in 1993

REASON FOR CALL: Ask to contribute $50,000 for the DNC Media Fund.

ADDITIONAL NOTES:

CALL RESULTS:

Confidential Information

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Susie Tompkins **SPOUSE:**

TITLE: Stockholder/Investor

COMPANY: Esprit de Corp.

ADDRESS: San Francisco, CA

PHONE: (w) 415-923-1001;

ASST NAME:

CONTRIBUTOR HISTORY: $100,000 in 1992.

REASON FOR CALL: Ask Susie to contribute $100,000 for the DNC Media Fund.

ADDITIONAL NOTES: Susie Co-chaired the San Francisco fundraiser for Clinton/Gore.

CALL RESULTS:

Confidential Information

DNC 3236941

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Ralph Lauren SPOUSE: Rikki

TITLE: Chairman

COMPANY: Polo, Corp.

ADDRESS: New York, NY

PHONE:

ASST NAME:

CONTRIBUTOR HISTORY: $1,000 in 1995, $25,000 in 1994.

REASON FOR CALL: Ask Ralph to contribute $50,000 for the DNC Media Fund this year.

ADDITIONAL NOTES:

CALL RESULTS:

Confidential Information

DNC 3236942

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Joan Helpern SPOUSE: David

TITLE: President and CEO

COMPANY: Joan and David Helpern, Inc.

ADDRESS: New York, NY

PHONE:

ASST NAME:

CONTRIBUTOR HISTORY: Has not contributed to the DNC; however, she has indicated to DNC staff that she would like to get involved. She is interested in supporting the President's efforts.

REASON FOR CALL: Ask to contribute $50,000 for the DNC Media Fund.

ADDITIONAL NOTES:

CALL RESULTS:

Confidential Information

DNC 3236943

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Marion Sandler **SPOUSE:** Herb

TITLE: Co-Chairman

COMPANY: Golden West Financial, Inc.

ADDRESS: San Francisco, CA

PHONE: ( )

ASST NAME: Karen

CONTRIBUTOR HISTORY: $3,750 in 1992; Have not been major contributors to the DNC, but they are DSCC Majority Trust members ($20,000).

REASON FOR CALL: Ask Marion to contribute $50,000 for the DNC Media Fund.

ADDITIONAL NOTES: Marion and her husband, Herb, are co-founders of Golden West Financial Inc., the nation's third largest thrift.

CALL RESULTS:

Confidential Information

DNC FINANCE CALL SHEET

FOR: Hillary Rodham Clinton

CALL SHEET PREPARED BY: Marvin Rosen

DATE: December 4

NAME: Huda or Samia Farouki

TITLE:

COMPANY: Hai Finance Corporation

ADDRESS: Vienna, VA

PHONE: w (703) 391-6107,

ASST NAME:

CONTRIBUTOR HISTORY: $51,000 in 1994

REASON FOR CALL: Ask Huda or Samia to contribute $50,000 for the DNC Media Fund.

ADDITIONAL NOTES: The Faroukis are Palestinian-Americans and are extremely supportive of the President's efforts in the Middle-East. Huda is Chairman of an international trading and shipping company, active in the export of construction materials and building machinery and equipment to Europe, the Middle East and the Far East. He serves on the Board of Builders for Peace. Samia is the founder and President of Hai Finance, a venture capital/investment company. She also serves on the board of the Corcoran gallery and on the board of the National Association of Arab Americans.

CALL RESULTS:

Confidential Information

AMPAD
• Blue carbon carbonless for repostable and copier reproducible duplicates.
• Area code map with spaces for frequently called numbers.
• Unit set construction for easy removal of originals.
• Premium Twin-Wire® binding.
8/17/95
Date From
8/29/95
To
Duplicate
200 Carbonless Sets
5½" x 4", 2 Per Page
TELEPHONE MESSAGE FORMS
23-023 1989 Ampad Corporation
ERE OUT
Number
Extension
PLEASE CALL
WILL CALL AGAIN
URGENT
WHILE YOU WER
EOP 059099

To Melanne

Date 8-29 Time 2:30pm

WHILE YOU WERE OUT

Mr. Ernie Green

at suggestion of Alexis Herman

Phone 452-4728

Area Code Number Extension

TELEPHONED		PLEASE CALL	✓
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	

RETURNED YOUR CALL

Message

re: trip to China

& supporter from

Arkansas, Charlie

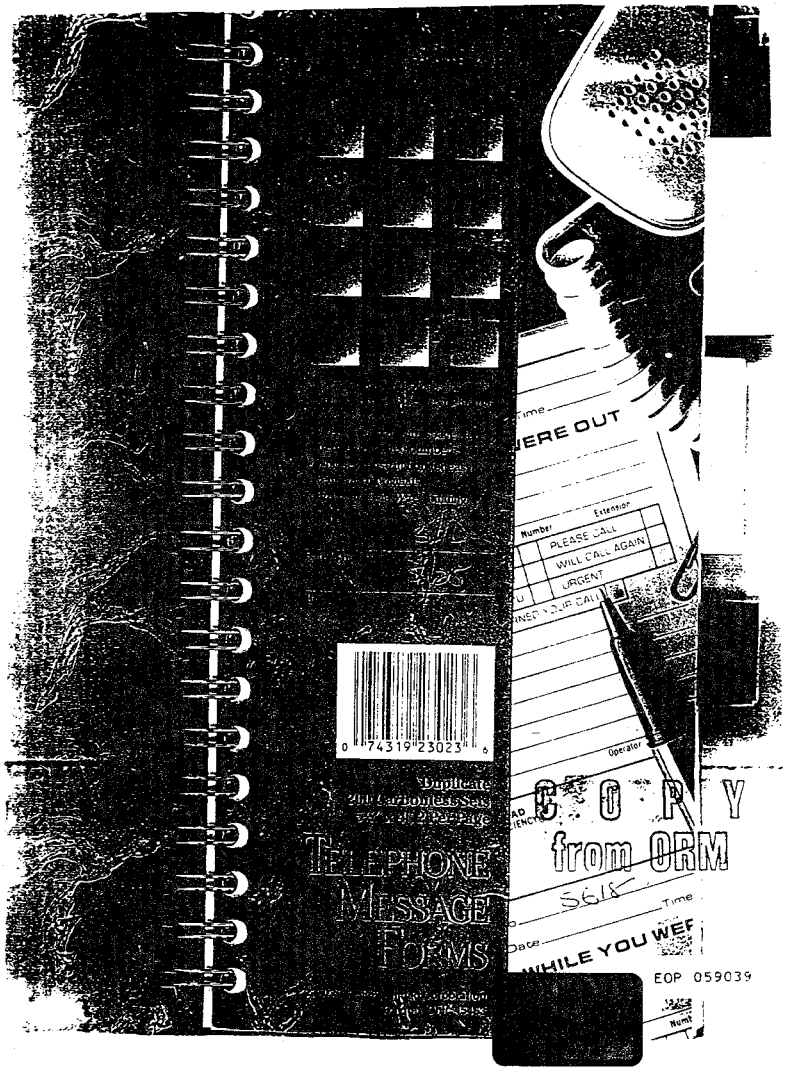
Tree

Anja

Operator

AMPAD EFFICIENCY® 22-023

EOP 059100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PLEASE CALL
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URGENT
Operator
Date
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WHILE YOU WER
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from ORM
S618
EOP 059039

To MARY.

Date 5-17-95 Time 10 55

WHILE YOU WERE OUT

M. MARK Middleton

of

Phone 543-8386

Area Code Number Extension

TELEPHONED		PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Please make lunch reservation for (7) seven on Friday - these are friends of the President who are in town - make under Maggie's name

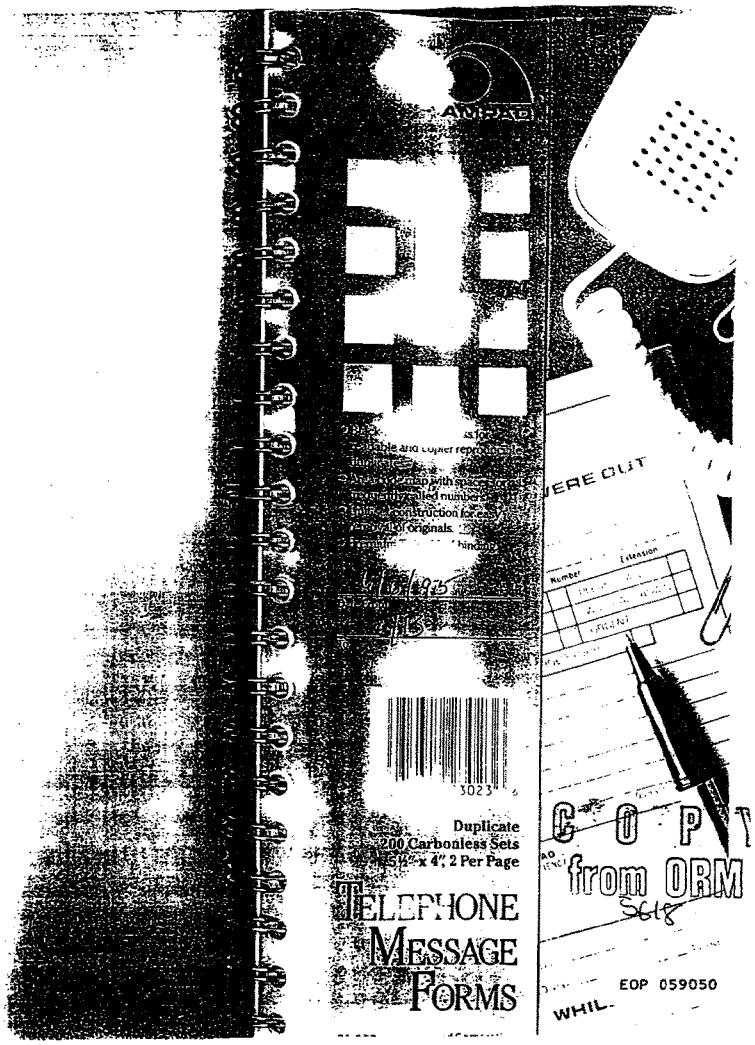
Call if to

Operator MP

AMPAD EFFICIENCY® 23-023 CARBONLESS

Confirm - then he will fax birthdate info.

EOP 059041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4" x 4", 2 Per Page
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MESSAGE
FORMS
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Extension
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from ORM
EOP 059050

To Evan

Date 6/7 Time 2:25

WHILE YOU WERE OUT

M. Mark Middleton

of

Phone 513 8386

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

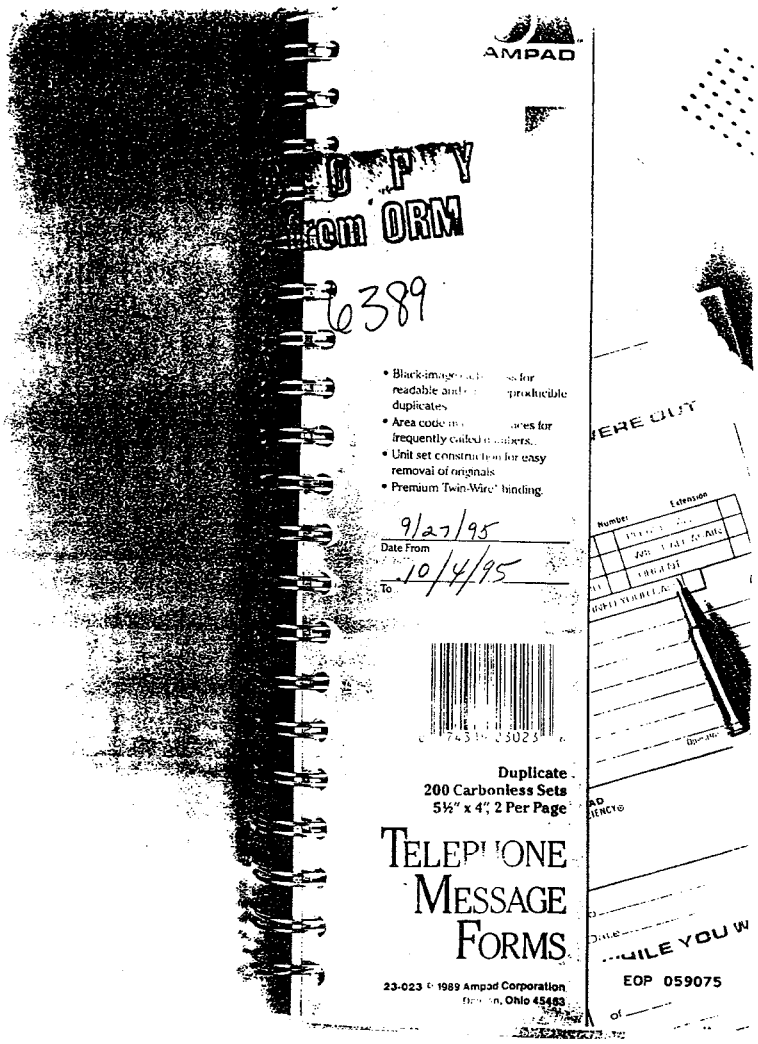
Message

Mon, Mess 2 people
12 - 1:30

Operator

EOP 059051

AMPAD EFFICIENCY® 23-023 CARBONLESS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TELEPHONE
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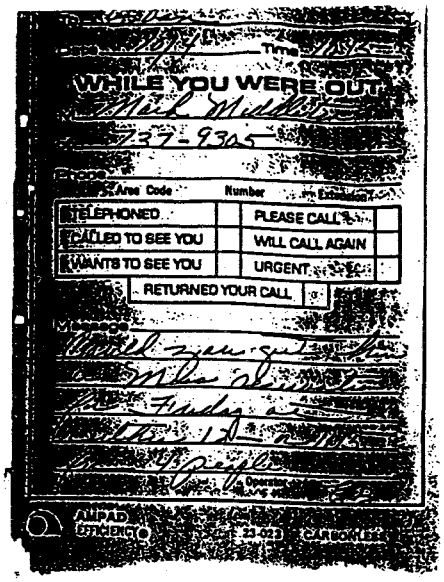
FORMS
23-023 © 1989 Ampad Corporation
Number
Extension
EOP 059075



Time

WHILE YOU WERE OUT

Mail Muddy

737-9305

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	

RETURNED YOUR CALL

Message

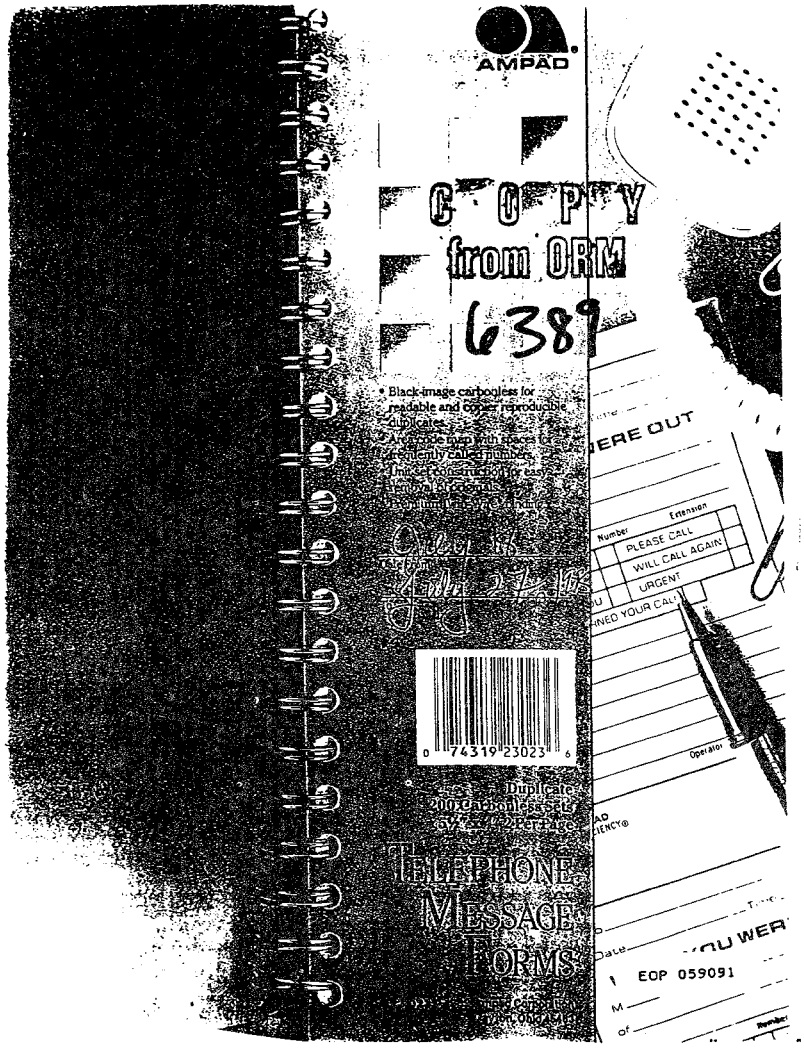
Would you call this
Mrs. [illegible]
Friday at
[illegible] 12 noon
[illegible] people

Operator's initials

NIPAD
EFFICIENT

23-023 CARBONLESS

EOP 059076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from ORM
6389
Black-image carbonless for readable and copier reproducible duplicates
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Duplicate
TELEPHONE MESSAGE FORMS
ERE OUT
Number
Extension
PLEASE CALL
WILL CALL AGAIN
URGENT
Operator
EOP 059091

To: Evan

Date: 7-20 Time: 11:5

WHILE YOU WERE OUT

M. Mark Middleton

of

Phone 543 8386

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

12 for 3 people

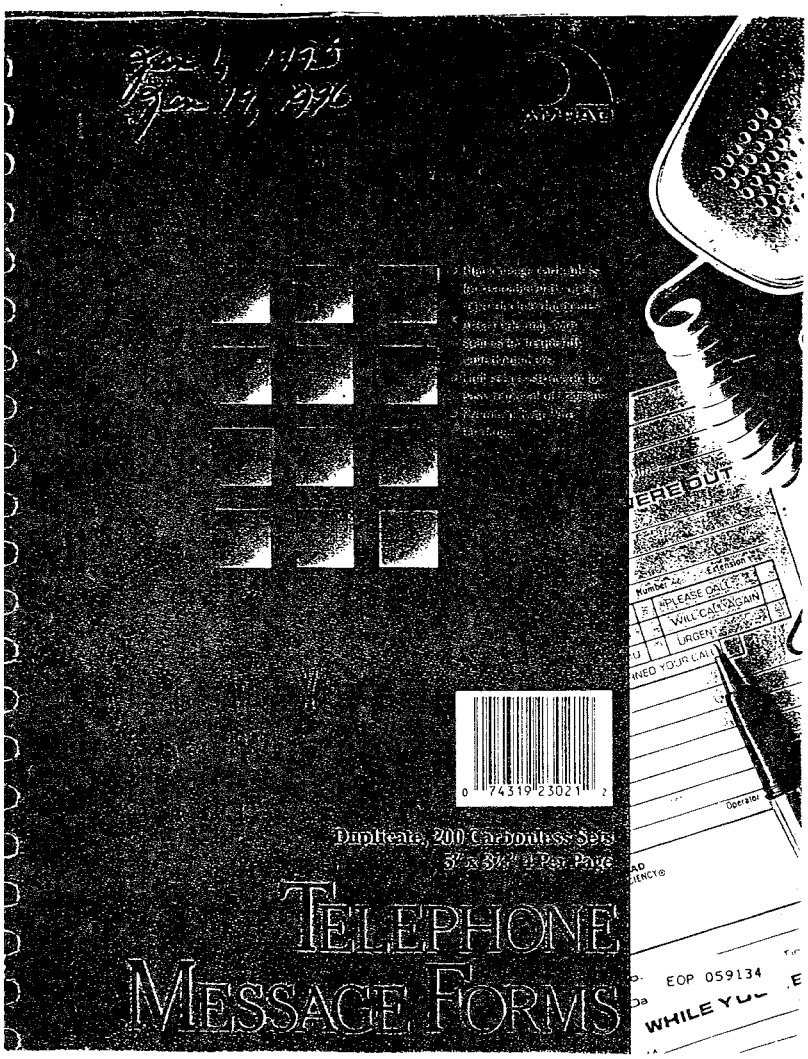
Larry O Jaynes 10-21-46

Jim Mosser 9-20-46

Mark Middleton 10-12-62

Operator

AMPAD EFFICIENCY® 23-023 C EOP 059092


Duplicate, 200 Carbonless Sets
5" x 3½" 4 Per Page
TELEPHONE
MESSAGE FORMS
0 74319 23021 2
EOP 059134
WHILE YOU

To Evan

Date 1-17-96 Time 2:20

WHILE YOU WERE OUT

M Linda

of Mark Middleton's office

Phone 737-9305

Area Code Number Extension

TELEPHONED		PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Please make a reservation for him in the Mess for Jan. 24th — a table for 4 at 12:00 noon or 1:30 pm. Let her know if you can.

MP

Operator

AMPAD EFFICIENCY® 23-021 · 200 SETS 23-421 · 400 SETS CARBONLESS

EOP 056855

RUN DATE : 95/05/01

VISITOR SUMMARY FOR 95/04

VISITOR			VISITEE		VIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TOA	POA
MIDDLETON	MARK		KHAPRA		U54709	1300	950421	W	WW	KHAPRA	Y	******	****	***
MIDDLETON	MARK		KHAPRA		U55898	0913	950425	W	WW	KHAPRA	Y	168524	0956	A04
MIDDLETON	MARK		MCLARTY	III	U57020	1430	950427	W	GFL/WW	VARNEY	M	043645	1422	A04
MIDDLETON	MARK		RYAN		U54764	1310	950421	O	100	RYAN	E	******	****	***

COMMITTEE ACCESS

EOP 020376

EXHIBIT

304

REPORT NO: WAV077BS

WAVES

PAGE NO: 436

RUN DATE : 95/06/01

VISITOR SUMMARY FOR 95/05

VISITOR		VISITEE		VIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TOA	POA
MIDDLETON	MARK	SMITH		U59265	1392	950502	O	156	SMITH		******	****	***
MIDDLETON	MARK	KHAPRA		U59333	1750	950502	W	WW	KHAPRA	Y	******	****	***
MIDDLETON	MARK	MCLARTY		U60180	1000	950504	W	WW	VARNEY	M	998797	1008	A04
MIDDLETON	MARK	WILLIAMS	III	U61727	1830	950508	W	GFL/WW	VARNEY	M	663656	1845	B04
				U61770	1030	950509	O	100	RYAN	E	1	1020	A04
MIDDLETON	MARK	KHAPRA		U66287	1200	950516	W	WW	KHAPRA	Y	535633	1204	A04
MIDDLETON	MARK	WILLIAMS		U66706	1330	950519	W	2FL/WW	RYAN	E	3	1309	A04
MIDDLETON	MARK	CRAWFORD		U68809	0830	950520	W	1FL/WW	KHAPRA	Y	243651	0807	B04
MIDDLETON	MARK	KHAPRA		U69921	1030	950530	W	WW	KHAPRA	Y	468436	1005	A04
MIDDLETON	MARK	CARRAW		U70358	1000	950531	O	118	CARR	K	******	****	***

COMMITTEE ACCESS

REPORT NO: WAV077BS WAVES PAGE NO: 415

RUN DATE: 95/07/03 VISITOR SUMMARY FOR 95/06

VISITOR		VISITEE		UIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TOA	POA
MIDDLETON	MARK	WILLIAMS		U72049	1100	950605	O	100	RYAN	E	834854	1101	B04
MIDDLETON	MARK	KHAPRA		U75852	0945	950613	W	WW	KHAPRA	Y	456456	0939	A04
MIDDLETON	MARK	WILLIAMS		U76668	1330	950620	W	2FL/WW	RYAN	E	543634	1326	A04
MIDDLETON	MARK	WILLIAMS		U82293	1700	950629	O	100	RYAN	E	348478	0000	B01

EOP 020378

COMMITTEE ACCESS

REPORT NO WAV077BS

RUN DATE : 95/08/01

WAVES

PAGE NO 409

VISITOR — VISITOR SUMMARY FOR 95/07

VISITEE			UIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	IDA	PDA
MIDDLETON	MARK	WILLIAMS	U90780	0800	950721	W	[redacted]	RYAN	U	******		
MIDDLETON	MARK	CAMERON	U91363	0900	950722	W	WW	CAMERON	R	34E3DC	0749	A04
MIDDLETON	MARK	KHAPRA	U91838	1500	950724	O	174	KHAPRA		34D918	0929	B04
MIDDLETON	MARK	KHAPRA	U92294	1600	950726	O	174	KHAPRA	Y	34D620	1536	D01
[redacted]	MARK	HATSUK	U92827	1400	950727	O	[redacted]	KHAPRA	Y	34D734	1615	D01
MIDDLETON	MARK	HATSUK	U92971	1400	950727	O	[redacted]	EDER	A	******	****	***
MIDDLETON	MARK	SCOTT	U93823	1600	950727	O	[redacted]	FLYNN	T	34DA0A	1401	D01
MIDDLETON	MARK	HEISTAD	U93917	0900	950728	O	149	FLYNN	T	******	****	***
MIDDLETON	MARK	HEISTAD	U94074	1100	950728	O	149	HEISTAD		******	****	***
										34D993	1141	D02

EOP 020379

COMMITTEE ACCESS

WAVES

RUN DATE 95/10/02

VISITOR SUMMARY FOR 95/09

			UIN	TIME	DATE		ROOM					
MIDDLETON	MARK	WILLIAMS	U09130	1315	950912	W	WW	RYAN	E	34BFA6	1244	A0
MIDDLETON	MARK	BUKLES	U08793	1200	950913	W	WW	MADARIS	P	******	****	**
MIDDLETON	MARK	EMERSON	U09875	1700	950913	O	106	WILLIAMS		34C3A6	1700	A0
MIDDLETON	MARK	KHAPRA	U09929	1700	950913	W	WW	KHAPRA	Y	******	****	**
MIDDLETON	MARK	MCLARTY III	U09935	0930	950914	W	WW	KHAPRA	Y	34D614	0921	A0
MIDDLETON	MARK	BCHIFF	U10296	1200	950914	W	WW	BCHIFF		34C3EF	1140	A0
MIDDLETON	MARK	CAREY	U10724	0800	950915	W	WW	CAREY	P	34DA6A	0800	B0
MIDDLETON	MARK	WILLIAMS	U10904	1200	950915	W	WW	RYAN	E	34DBAA	1215	A0
MIDDLETON	MARK	WILLIAMS	U10614	2000	950915	W	WW	RYAN	E	******	****	**
MIDDLETON	MARK	KHAPRA	U11680	1413	950918	W	WW	KHAPRA	Y	34D625	1324	D0
MIDDLETON	MARK	WILLIAMS	U14240	1030	950926	O	100	RYAN	E	34D727	1052	D0
MIDDLETON	MARK	KHAPRA	U14434	1300	950926	W	WW	KHAPRA	Y	******	****	**
MIDDLETON	MARK	KHAPRA	U15349	1320	950929	W	WW	KHAPRA	Y	34D939	1405	B0
MIDDLETON	MARK	KHAPRA	U15349	1320	950929	W	WW	KHAPRA	Y	34DA00	1333	A0
MIDDLETON	MARK	KHAPRA	U16397	1600	950929	W	WW	KHAPRA	Y	34DA01	1635	A0
MIDDLETON	MARK	POTUS	U08621	1600	950911	W	STATE F	WIDDESS		******	****	**
MIDDLETON	MARK	POTUS	U10708	1830	950915	O	EAST RO	WIDDESS	K	000000	1924	01
MIDDLETON	MARK	POTUS	U15354	[illegible]	[illegible]	W	SOUTH LAWN	WIDDESS	K	000000	1711	V1

EOP 020380

COMMITTEE ACCESS

REPORT NO: WAV077BS

WAVES

PAGE NO:

RUN DATE : 95/12/01

VISITOR SUMMARY FOR 95/11

VISITOR		VISITEE		UIN	TIME	DATE	ROOM	REQUESTOR	DOH	TOA	SSN
MIDDLETON	MARK	LAVINE			[illegible]	951107	450	WICKOFF	U	010767	101[illegible]
MIDDLETON	MARK	MCLARTY	III	U28854	2130	951101	WW	LAVINE		******	**** *******
MIDDLETON	MARK	WILLIAMS		U28928	0930	951102	WW	KHAPRA	Y	101262	0931
MIDDLETON	MARK	LAVINE		U28958	1000	951102	WW	RYAN	E	******	**** *******
MIDDLETON	MARK	SKINNER		U29372	2130	951102	WW	LAVINE		101262	2133
MIDDLETON	MARK	KHAPRA		U29365	1400	951103	WW	KHAPRA	Y	******	**** *******
MIDDLETON	MARK	KHAPRA		U32611	1700	951113	WW	KHAPRA	Y	101262	1727
MIDDLETON	[illegible]			U32900	1010	951114	174	KHAPRA	Y	101267	1037

COMMITTEE ACCESS

EOP 020382

REPORT NO: WAV07785

RUN DATE : 95/12/01

WAVES

VISITOR SUMMARY FOR 95/11

PAGE NO:

VISITOR			VISITEE	UIN	TIME	DATE	ROOM	REQUESTOR	DOB	TOA	SSN
MIDDLETON	MARK		RYAN	U34358	1100	951128	EW-209	RYAN	040960	1037	
MIDDLETON	MARK	J	RYAN	U34388	1100	951128	EW-209	RYAN	040960	1037	

COMMITTEE ACCESS

EOP 020383

REPORT NO: WAV07785 WAVES PAGE NO:

RUN DATE : 96/03/01 VISITOR SUMMARY FOR 96/02

VISITOR		VISITEE		UIN	TIME	DATE	ROOM	REQUESTOR		DOB	TOA	SCN
MIDDLETON	MARK	MCLARTY	111	U55843	1300	960201	WW	VARNEY	M	101262	1304	
MIDDLETON	MARK	KHAPRA		U56747	0800	960203	WW	KHAPRA	Y	101262	0802	
MIDDLETON	MARK	MCLARTY		U57695	1300	960206	WW	MOLLY		101262	1533	
MIDDLETON	MARK	KHAPRA		U57361	1515	960206	WW	KHAPRA	Y	******	****	*****
MIDDLETON	MARY	RYAN		U60742	1430	960214	100	RYAN	P	101262	1400	

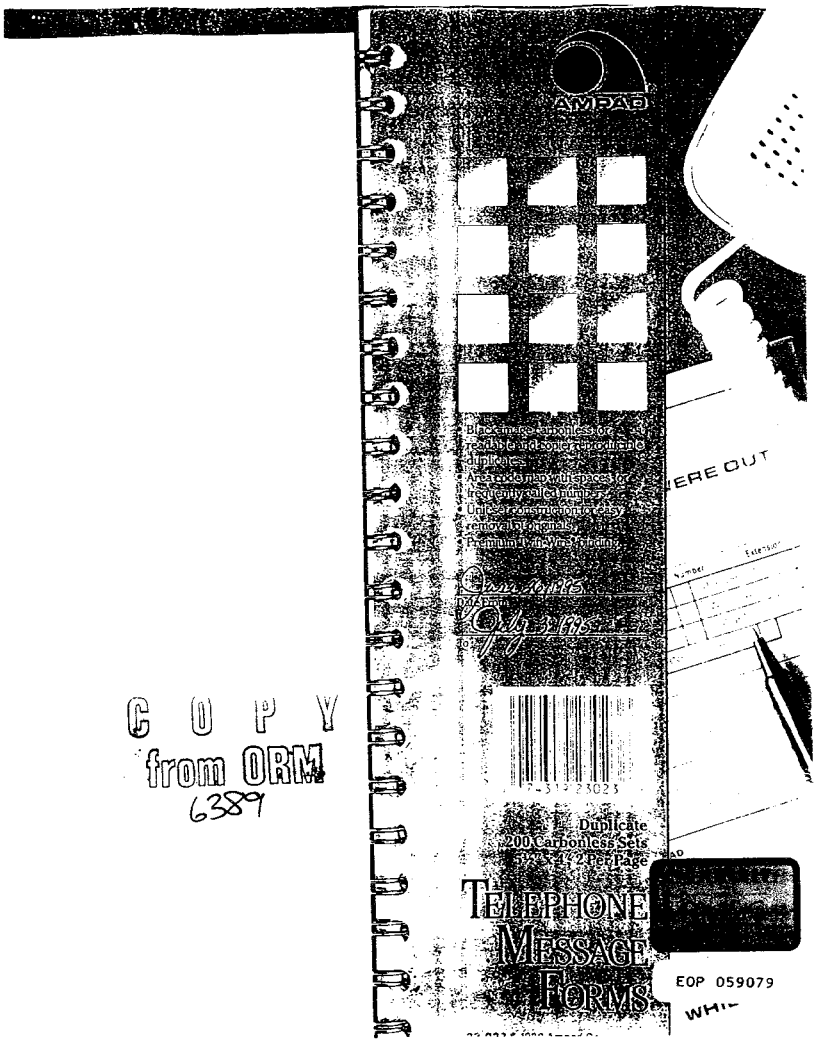
COMMITTEE ACCESS

EOP 020387

REPORT NO. WAV07705 WAVES PAGE NO 295

RUN DATE : 96/10/01 VISITOR SUMMARY FOR 96/09

VISITOR		VISITEE	VIN	TIME	DATE	ROOM	REQUESTOR		DOB	TOA	SSN
MIDDLETON	MARK	HERNREICH	U46393	1300	960909	WW	CAMERON	R	101262	1230	
MIDDLETON	MARK	RYAN	U46454	1430	960923	100	RYAN	E	101262	1430	
MIDDLETON	MARK	BUTTON	U47394	1000	960927	100	BUTTON	K	101262	1000	
MIDDLETON	MARK	MCCOY	U47751	1000	960930	EW	MCCOY		101262	1020	
MIDDLETON	MARK	SCHIFF	U48019	1200	960930	WW	SCHIFF		101262	1152	
			U46682	1700	960926	490	SCOTT	N	111455	1633	411989395
				100	[illegible]	[illegible]	[illegible]				



COPY
from ORM
6389

To EVAN

Date 6-28-95 Time 12:29

WHILE YOU WERE OUT

M. Shawn

of MARK Middleton's office

Phone

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message The meeting for tomorrow at 5 pm is great – for Maggie, Lynn Cutler and Mark Middleton

NP

Operator

AMPAD EFFICIENCY® 2 EOP 059080

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	T
950509	PARICHATTK	PORNPIMOL		U61581	LAVINE	LAVINE	WW	13:03	A0402	0:0	
950519	TRIE	YAN		U66376	RYAN	WILLIAMS	2FL/WW	13:09	A0402		
950819	TRIE	YAN		U66214	SHULMAN	MATSUI	450	14:35	00101	0:0	

COMMITTEE ACCESS

EXHIBIT
OVD-16

EOP 003720

10/17/96 DNC Finance Page 1

Executive Summary

Mr. Charlie Trie

WRITTEN 1996 Total: $0 1995 Total: $0

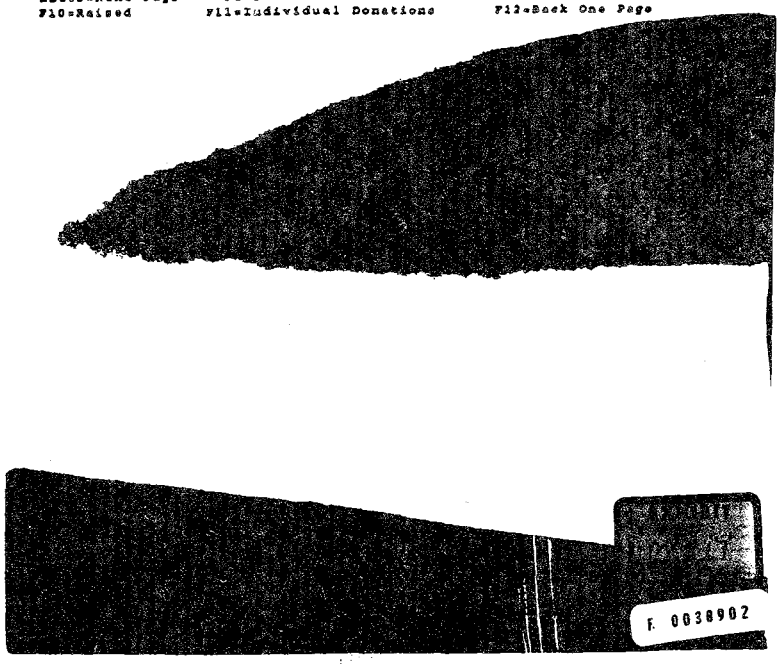
Date	Type	Amount	Source	Solicitor
5/12/94	F01	$20,000	1994 HEALTH CARE CAMPAIGN	Mr. Richard Mays
5/12/94	N03	$60,000	1994 HEALTH CARE CAMPAIGN	Mr. Richard Mays
0/00/00		$0		
0/00/00		$0		
0/00/00		$0		
0/00/00		$0		

Daihatsu International

WRITTEN 1996 Total: $0 1995 Total: $0

Date	Type	Amount	Source	Solicitor
7/18/94	N01	$7,500	BC NATIONAL DINNER	Mr. Richard Mays
0/00/00		$0		
0/00/00		$0		
0/00/00		$0		
0/00/00		$0		
0/00/00		$0		

Enter=Next Page F1=Print F3=Exit F9=Company Donations
F10=Raised F11=Individual Donations F12=Back One Page



MEMORANDUM FOR HAROLD ICKES

From: Terry McAuliffe
Laura Hartigan
Ari Swiller
Date: February 15, 1995
Re: Managing Trustee Dinners

The dinner February 16th is the first of two dinners (the second is February 21st) honoring the Democratic National Committee's Managing Trustees. Those invited either raised over $250,000 or wrote $100,000 for the DNC in 1994. The program is co-chaired by Scott Pastrick and Beth Dozoretz and there are currently ninety-one members. This group will be an anchor in the 1995and 1996 fundraising efforts.

To note: February 16th is Alan Solomont's birthday. Alan served as co-chair of the Presidential dinner in Boston. Larry Hawkins and Pat Varone got married last weekend. Larry was a co-chair of the Florida Presidential dinner in 1994.

President and First Lady's Tables:

1. POTUS
2. Stan Shuman
3. Susan Solomont
4. Patricia Bugelas-Brandt
5. Edgar Bronfman, Jr.
6. Courtney Pastrick
7. C.J. Wang
8. Sondra Montrone
9. Mark Jimenez
10. Pauline Kanchanalak

1. FLOTUS
2. Alan Kligerman
3. Kathleen Leonard
4. Belvin Friedson
5. Sam Domb
6. Charlie Trie
7. Joyce Schechter
8. Scott Pastrick
9. Pat Varone
10. Lee Goldfrey

EOP 043683

To: Alexis Herman, Maggie Williams, Mack McLarty
From: Lynn Cutler
Re: Request of Mark Jimenez
Sept. 25, 1996

Mark Jimenez of Florida, who has been very helpful to us on a variety of fronts, has called asking if he could be on the delegation to the APEC Conference in the Phillipines, that will take place November 22-25.

You will remember that Mark is from the Phillipines, and I know that this means a great deal to him.

Please advise me if there is something else I should do to be of help to Mark. This is really important.

I am at 496-4886. Thanks.

Sept. 29

To: Dan Tarullo
From: Mack McLarty

Dan -
We need to discuss this and other requests in setting.
Thanks
Mack
cc: Melanne V
Bill

FOB 063612

[redacted]

I [illegible] Group 2

- hard to check background

- checks Tree $ → charges / money orders

463,000 $382 accepted

$179,000 - [illegible] received [illegible] delivery of to Cuba - but Tree [illegible] hard to [illegible]

- first delivery of 4 tubes $382 was accepted

The balance (463 - 382) was never deposited

- Checks Tree - [illegible] $179,000

102 - money orders

285 + - wire charges

[illegible] money orders purchased [illegible] phone

① have requested numbers

① name from all add over the country

① many filled out in same hand writing

① most used Nanna

① most don't have a shipping account

①

Sullivan - [illegible] Group

Chang Hai - - noted by many people as

and -

Most of came from meeting in his apartment by Chang Hai (woman) who usual has

- 1590 born in Hai Nan

I when Taiwan

Chang Hai

Her real name later changed to Chang Hai

[illegible]

[illegible]

12 [illegible] [illegible] UPS

- [illegible]

CGRO-2595
Rev. 2/3/97

[illegible] a [illegible] source

- [illegible] leader [illegible] of [illegible] as a [illegible]

- Humanitarian organization -

- she as a leading cause of divorce in [illegible]
  Unit Nance is USA

-

Sally called many many of contributors who knew about their contributions -

Many orders were filled in

A number of people said Chung Hsi advanced $ from many orders & these were reversed - by the [illegible] individual

- A number of charges too were for $2 or $3,000 & people who with the charges said it was for [illegible] relatives who didn't have a a charging account

A number of people at the L.A. [illegible] nearly of Chung Hsi & were so support it very good way to help DC -

Average contribution	$131 to 12/31/95	
Average contribution of those [illegible] contributors	$936	
Net receipts	$977,000	to 12/31/95

563,000 = 73% of all $ received

- 1.5 million outstanding bank loan
- 700,000 in bank - } includes 387,000 deposited

1. Counsel to ~~[illegible]~~ trust says most of the contributions seem to be legal –

– Hurley –
Katzenbach

⊖ Do PR HBC – want to ~~[illegible]~~ new directors to
trustees to be ~~[illegible]~~ careful –
They disclaim

⊖ Cheques ~~if~~
⊖ Corporate cheques ~~[illegible]~~ were returned
⊖ or
⊖ Trust accepts cheques from firms over $1,000
if balance is ~~[illegible]~~ from a family
member –

~~[illegible]~~ –
2 – co-chairs instructed ~~to~~ accept checks
that funds ~~that~~ ~~that~~ came from
the person who is paying it

No contributions from nationals from foreign
funds $463,000

Cheques – ⊖ 295 people paid by cheques
102 contributions paid by money
orders
about 200 money orders

⊕ Not report due August
– 6 cut off date 6/30/96 –

Could allow all of a city people to [illegible] what they want

DeRaleigh now to T/HAC w/ right input - about [illegible] when [illegible] -

CGRO-2598
Req. 2/3/97

PRESIDENTIAL LEGAL EXPENSE TRUST
1111 19th Street, N.W., Suite 608 · Washington, D.C. 20036
Telephone (202) 463-8423 · Telefax (202) 463-8426

August 12, 1996

Cheryl Mills, Esq.
Associate Counsel to the President
Old Executive Office Building Room 128
Washington, DC 20500

Dear Cheryl:

You may want to circulate by hand the enclosed letter from David Lawrence to:

Mrs. Clinton
Jack Quinn
Harold Ickes
Bruce Lindsey
Evelyn Lieberman
Maggie Williams

Thanks for your assistance.

Sincerely,

Michael H. Cardozo
Trustee and Executive Director

Enclosure

TRUSTEES

John Brademas · Michael H. Cardozo · Theodore M. Hesburgh, C.S.C. · Nicholas deB. Katzenbach
Ronald L. Olson · Elliot L. Richardson · Michael I. Sovern · John C. Whitehead

Barbara Jordan (1936-1996)

J990014

Mr. David S. Lawrence

PRESIDENTIAL LEGAL EXPENSE TRUST
SUITE 608
1111 19TH STREET, N.W.
WASHINGTON, D.C. 20036

20036/3603

July 5, 1996

Presidential Legal Expense Trust
Suite 608
1111 19th Street, N.W.
Washington,D.C. 20036

Attn: Theodore M. Hesburgh, C.S.C.; & Nicholas deB. Katzenbach,
Co-Chairs
for the Trustees.

Dear Sirs:

Thank you for your letter of June 27, 1996 with its enclosures, including a check for $1,000 refunding my contributions of March 16, 1996 having the same total amount.

I realize that the letter was sent for the purpose of ensuring compliance with very strict standards of ethical accountability, and that in the normal course of events nearly all bona fide contributors would return the same amount to you with the additional data called for (phone, occupation, employer's name, and address where not previously supplied). Others would simply cash or deposit the check, possibly returning a letter of acknowledgment.

Unfortunately, as you suspected, the funds were raised by the efforts of a concerned party who was unaware of some of the terms mentioned in your letter. In particular, none of those in the private association involved in the fundraising knew that the individual U.S. citizen donors were required to use only their own funds. In my case, $500 given by money order was advanced by the association or its leader and not reimbursed by me. We were led to believe that reimbursement was optional. I am sure that none of the members or leadership of the association knew otherwise. In addition, I was not made aware of the other terms mentioned in your letter. In particular, I was not aware that the Trust "will make periodic public reports of fund contributors."

After complying with the exhortations of this association's leadership to donate the funds, I realized to my chagrin that I would probably ever after be on political fundraising mailing lists for contributions of $1,000. That discomfort pales before the awareness of being on a public list of such contributors. As a result, I am sure I want to rescind my $500 contribution by depositing your check. Because $500 of your reimbursement for the total amount belongs to the association I must also send a check for that amount to the "SUMA Ching Hai International Association," together with a copy hereof.

I hope and have confidence that you will receive enough voluntary contributions that the President's campaign and Presidency will not be affected by the proceedings against him, (which may well be in part the result of political animosity and bad faith). Such effects were advanced as the reason for the association's seeking these donations "in principle" from U.S. citizen members, regardless of whether we intended to vote for Mr. Clinton in November.

Because of the manner in which funds were raised in this episode, I have withdrawn from active membership and have been pondering submitting my resignation from the association involved, and have decided to do so in the covering letter which accompanies their copy of this letter. Although the leader's position is presumably sincere, it reflects a wide divergence between her judgment and mine as to when donations from particular sources are necessary and appropriate and what kinds of exhortation and social pressure are appropriate for fundraising. In addition, although I wish Mr. Clinton well and have a general preference for such small nuances of distinction as there are between his policies and those of his major-party opposition, I am far from having decided to cast my vote for him in November. Had I done so, the amount of an appropriate contribution in my modest financial circumstances would be far smaller than the one involved in this incident.

Thank you for the principled attention you have given this matter. I trust there will be no further problem.

Yours sincerely,

David S. Lawrence

David S. Lawrence

cc: S.U.M.A.Ching Hai International Association

RECORD TYPE: PRESIDENTIAL (ALL-IN-1 MAIL)

CREATOR:Evan M. Ryan (RYAN_E) (WHO)

CREATION DATE/TIME: 9-MAY-1996 11:50:11.27

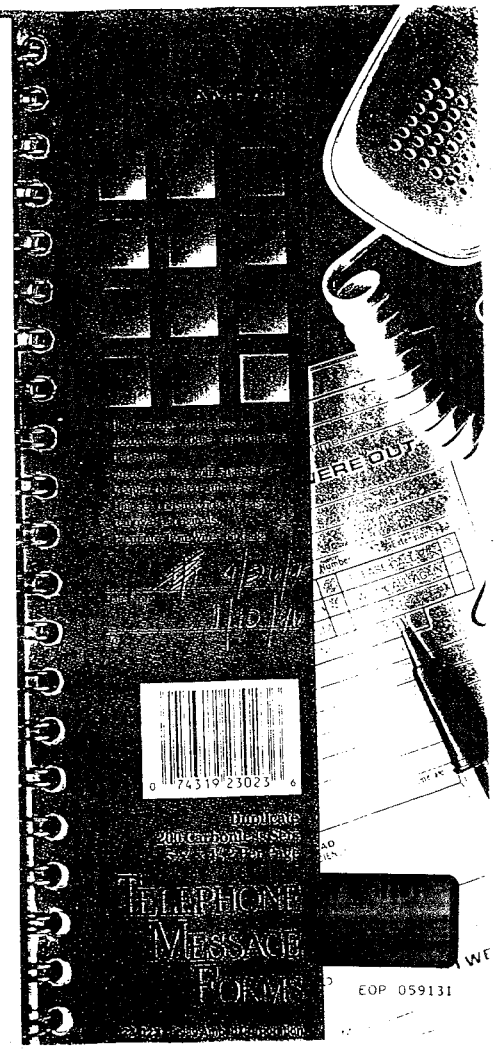
SUBJECT:Call List additions

TO:Peggy A. Lewis (LEWIS_P) (WHO)
READ: 9-MAY-1996 12:27:35.36

TEXT:
Maggie wanted to add John Huang to her call list - 863-7178
He's from the DNC
Is Chuck Supple still on that list 638-3300?

COMMITTEE ACCESS

EOP 006621



COPY
from ORM
1973

To Maggie

Date 10/13 Time 10:30

WHILE YOU WERE OUT

M. Yusuf Khapra

of Erskine Bowles's Office

Phone 61955

Area Code Number Extension

TELEPHONED	✓	PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message He said that it's very important that you get in back w/Hank Middleton who is at the following number 1-809-523-3333

Call Yusuf if you have any questions.

Operator Emily

AMPAD EFFICIENCY® 22-023 CARBONLESS

EOP 059133

Looks good
If we can keep the
expenses down, we
should do fine
Let us know
BC

THE PRESIDENT HAS SEEN
6/15/95

Looks good
If we can keep those
expenses down/we
should do fine
Let you know
BC

5 June 1995

MEMORANDUM TO THE PRESIDENT
THE VICE PRESIDENT

CC: LEON PANETTA
MAGGIE WILLIAMS
JACK QUINN
DOUG SOSNIK

FROM: Harold Ickes (HI)

SUBJECT: '96 re-elect fundraising projections and expenses

On 3 June 1995, I met with Laura Hartigan to review the re-elect's fundraising projections, staffing and estimated finance department expenses.

As shown on schedule A (attached), projected revenue for the period of April-June 1995, was originally $5.4 million, which included $800,000 to be transferred from the 1992 campaign. As a result of the recent addition of "large donor" fundraisers during this period, which are not reflected in schedule A, Laura is confident that the total receipts for those 3 months will approximate $8.3 million, of which approximately $4.6 million will be matchable. Instead of $800,000, only $250,000 was actually transferred from the '92 campaign. Thus, in effect, by the end of June 1995, $13.1 million will have been raised, including $4.6 million in matching funds and including the $250,000 transferred from the '92 campaign.

Terry and Laura estimate that of the approximate $43.4 million to raised for the "primary" process, some $13 million are expected to be federal matching funds which means that $30.4 million needs to be raised.

There are currently 17 paid fundraising staff members as of 30 May. By the end of August 1995, the total paid fundraising staff will be 30-34 people.

Schedule B, attached, is the up-dated estimated expenses for the fundraising operation for the pre-Convention period which totals $7.3 million. This does not include the splitting of some expenses with DNC, where the DNC and the re-elect conduct joint fundraisers. Thus, the total amount could be less than the $7.3

CGRO-013451
Reg. 5/28/97

million shown on schedule B.

The $7.3 million includes estimated costs for Air Force 1 and Air Force 2, and travel costs for HRC and Mrs. Gore. It also includes printing, postage and processing of all direct mail solicitations, as well as the retainer fee for the direct mail consultants.

Although the expenses on schedule 2 are projected through June 1996, Laura thinks it probable that most fundraising will be concluded by the end of February which would permit the shifting of fundraising staff to the DNC and, thereby, possibly reducing the projected $7.3 million in over-all fundraising expenses.

The bulk in fundraising expenses ($6.0 million) will have been incurred by the end of December 1995.

Finally, attached is a document captioned "Clinton/Gore '96 Finance Department Structure and Review," which I received from Laura Hartigan.

Please let me know if you have any questions, need further information or wish to discuss.

NOT FOR OFFICIAL USE

6/7/95

Clinton/Gore '96 Finance Department

Department Structure & Review

CGRO-013453
Req. 5/28/97

Clinton/Gore '96 Finance Department
Regional Finance Structure

New York Region

States: New York
Connecticut

Staff: Regional Director (TBD)
Regional Deputy Director (TBD)

New Jersey Region

States: New Jersey

Staff: Jennifer Scully, Regional Director

New England Region

States: Massachusetts
Rhode Island
Maine
New Hampshire
Vermont

Staff: Regional Director (TBD)

Pennsylvania Region

States: Pennsylvania

Staff: Regional Director (TBD)

Mid-Atlantic Region

States: Washington, DC
Delaware
Maryland
Virginia

Staff: Ann Rowan, Regional Director
David Bryant, Regional Deputy Director/African American Outreach

CGRO-013454
Req. 5/28/97

Florida/South Region

States: Florida
Georgia
North Carolina
South Carolina
Alabama
Mississippi
Kentucky
Tennessee

Staff: Peter O'Keefe, Regional Director
Jay Dunn, Regional Deputy Director

Texas/South Region

States: Texas
Oklahoma
Louisiana

Staff: Meredith Jones, Regional Director

Arkansas Region

States: Arkansas

Staff: Jay Dunn is working with Skip Rutherford

Southern California Region

States: Southern California (Los Angeles)

Staff: Kimberly Ray, Regional Director
Regional Deputy Director (TBD)
Hannah Bond, Regional Finance Assistant

Northern California Region

States: Northern California (San Francisco)

Staff: Regional Director (TBD)

Western States Region

States: Washington
Oregon
Colorado
Arizona
North Dakota
South Dakota
Montana
New Mexico
Wyoming
Nevada

Staff: Connie Sanders, Regional Director
Regional Deputy Director (TBD)

Mid-Western Region

States: Illinois
Ohio
Indiana
Minnesota
Wisconsin
Kansas
Missouri
Iowa

Staff: Mark Thomann, Regional Director

Vice Chair/Special Programs

→ James Rubin, Director of Business Outreach
Jeff King, Director of Operations & National Programs

National Health Care Coalition
National Women's Coalition
National Business Leadership Council
Jewish Community
African American Community

Clinton/Gore '96 Finance Department
Lay Leadership Structure

National Finance Chairman (1)	**Terry McAuliffe**
National Finance Vice-Chairs (5)	**Commitments of $1,000,000 plus**
National Finance Co-Chair (10)	**Commitments of $500,000**
National Finance Executive Board (25)	**Commitments of $100,000**
National Finance Board Members (200)	**Commitments of $50,000**
National Finance Committee (100)	**Commitments of $10,000**

General Description

- The National Finance Board will be comprised of 200 of the President's strongest supporters and top business leaders from around the country who have agreed to raise money for the Re-Election Campaign.
- In order to use the President's time effectively, several events will be held in Washington, DC, so that people can come to Washington and have a day of briefings with White House staff and a dinner with the President.
- Finance Board members will have the opportunity to participate in Quarterly Meetings held in Washington, DC. The first meeting will be held June 19th and will include a luncheon with Vice President Gore, political and campaign briefings from White House staff and Washington political leaders, and a White House Reception with the President and First Lady.

CGRO-013457
Req. 5/28/97

Clinton/Gore '96 Finance Department
Scheduled Events Through December 1995

May 18 - Washington, DC - Luncheon with the First Lady
May 24 - Washington, DC - Reception with the Vice President
May 24 - Washington, DC - Saxophone Club Reception with the Vice President

June 6 - Washington, DC - Reception with the Vice President and Tipper Gore
June 15 - Newark, NJ - Tea with Secretary Donna Shalala
June 15 - Florida (3 Cities) - Breakfast, Lunch and Dinner with the Vice President
June 19 - Washington, DC - National Finance Board Luncheon with the Vice President
June 19 - Washington, DC - National Finance Board Reception with the President and First Lady
June 22 - Somerset, NJ - New Jersey Presidential Dinner (All Principals)
June 23 - Little Rock, AR - Little Rock Presidential Luncheon (All Principals)
June 29 - Chicago, IL - Chicago Presidential Dinner (President & First Lady)

July 11 - Washington, DC - Dinner with the First Lady
July 11 - Washington, DC - Reception with the Vice President
July 12 - Baltimore, MD - Luncheon with Tipper Gore
July 13 - Washington, DC - Dinner with the President
July 25 - Washington, DC - Dinner with the President
July 31 - Washington, DC - Reception with the Vice President

Do not include grand
strategy committee
meeting minutes

August 2 - Washington, DC - Dinner with the President
August 10 - Washington, DC - Dinner with the President

September 7 - Washington, DC - Dinner with the President
September 12 - Washington, DC - Dinner with the President
September 18 - Denver, CO - Dinner with the President
September 19 - San Francisco, CA - Luncheon with the President
September 19 - Los Angeles, CA - Dinner with the President
September 20 - Miami, FL - Dinner with the President
September 21 - Panama City, FL - Luncheon with the President
September 21 - Philadelphia, PA - Dinner with the President
September 26 - Washington, DC - Washington Presidential Gala
September 26 - Washington, DC - Saxophone Club Presidential Celebration

October 16 - Boston, MA - Dinner with the President
October 17 - Nashville, TN - Dinner with the President
October 21 - Pittsburgh, PA - Dinner with the President
October 24 - New York, NY - Dinner with the President

November 14 - St. Louis, MO - Luncheon with the President
November 14 - Detroit, MI - Dinner with the President

CGRO-013458
Req. 5/28/97

Clinton/Gore '96 Finance Department
Direct Mail & Telemarketing

Staff: Kim Cubine, Director of Marketing & Direct Mail

Consultant: Malchow, Adams & Hussey
Washington, DC

April

One Mailing

May

One Mailing
One Telemarketing

June

One Mailing
One Telemarketing

July

One Mailing

August

One Mailing

September

Three Mailings

October

One Mailing

November

One Mailing

CGRO-013459
Req. 5/28/97

Clinton/Gore '96 Finance Department
Staff

Laura Hartigan
National Finance Director
202/496-4813
202/496-4848 FAX

Description: Implement the major donor fundraising plan
Background: DNC Finance Director; Clinton/Gore '92 Mid-West Finance Director

Rick Lerner
Deputy Director of Finance
202/496-3802
202/496-4848 FAX

Description: Implement the major donor fundraising plan
Background: NJ Finance Director for Clinton/Gore '96; Harvard Business School

Jeff King
Director of Operations, Finance Department
202/496-4803
202/496-4848 FAX

Description: Implement the organization and operational aspects of the fundraising plan
Background: DNC Finance Department; 1992 Democratic Governors' Association; 1992 Pamela Harriman

Kim Cubine
Director of Marketing and Direct Mail
202/496-4804
202/496-4848 FAX

Description: Implementation of the direct mail plan
Background: DCCC Director of Marketing & Direct Mail

CGRO-013460
Req. 5/28/97

Jason McIntosh
Assistant to the National Finance Chairman
202/496-4814
202/496-4848 FAX

Description: Adminsitrative support
Background: DNC

Victoria Hight
Fundraising Coordinator
202/496-4813
202/496-4848 FAX

Description: Fundraising coordination and logistical support
Background: Congressman Colin Peterson

Jackson Dunn
Regional Finance Director
202/496-4810
202/496-4848 FAX

Description: Fundraising director for NC, SC, AL & AR
Background: DNC Deputy Southern Director; Terry Sanford Campaign

Jennifer Scully
New Jersey Finance Director
201/228-6110
202/496-4809 DC Voice Mail
202/496-4848 DC FAX

Description: New Jersey fundraising
Background: DNC Trustee Program

Peter O'Keefe
Southeast Finance Director
202/496-4811 DC Voice Mail
202/496-4848 FAX

Description: Fundraising in FL, GA, MS & LA
Background: DNC Southern Finance Director; 1992 Clinton/Gore - Kentucky

CGRO-013461
Req. 5/28/97

Ann Rowan
Mid-Atlantic Finance Director
202/496-4807
202/496-4848 FAX
Description: Fundraising in DC, MD, DE & VA
Background: Mike Andrews Finance Director; Senator Bentsen Finance Director & COS

Mark Thomann
Regional Finance Director
312/853-1163
312/853-0279 FAX
202/496-4808 DC Voice Mail
202/496-4848 DC FAX

Description: Fundraising in IL, OH, WI, IN, MI & MN
Background: Alan Wheat's Finance Director

Matthew N. Gobush
Director, The Saxophone Club
202/496-4877
202/496-4848 FAX
Pager TBD
Description: Fundraising for the Saxophone Club
Background: DNC Saxophone Club; DNC Trustee Program

David Bryant
Deputy Mid-Atlantic Finance Director
Phone TBD
202/496-4848 FAX
Pager TBD
Description: Fundraising in the Mid-Atlantic Region; African-American Outreach
Background: Legislative Assistant on Capitol Hill

Elaine Howard
Director of Events, Finance Department
202/496-4826
202/496-4848 FAX

Description: Event logistics
Background: DNC Event Director

CGRO-013462
Req. 5/28/97

Position TBD
Director of the Clinton/Gore '96 Women's Coalition
Description: Development a national coalition of women who support and raise funds for the Clinton/Gore Campaign

Kris Van Giesen
Director of Donor Relations & White House Liaison
202/496-4867
202/496-4848 FAX
Pager TBD
Description: Acts as liaison to the White House for scheduling issues and responds to donor requests.
Background: Office of the Vice President; Clinton/Gore '92 Advance Staff; Hartigan for Governor Campaign

Joan Kenny
Finance Coordinator
202/496-4805
202/496-4848 FAX

Description: Event logistics and check processing
Background: DNC; New York University MBA

Todd Floyd
Finance Coordinator & Event Assistant
202/496-4806
202/496-4848 FAX

Description: Event logistics

July 1 Start Date

Kimberly Ray
Southern California Finance Director
202/496-4825
202/496-4848 FAX
Pager TBD
Description: Fundraising in Los Angeles and Southern California
Background: Southern California Finance Director for Senator Diane Feinstein

Jamie Rubin
Director of Business Outreach
202/496-4825
202/496-4848 FAX
Pager TBD
Description: Fundraising in the business community; coordinate lay leader projects
Background: Fundraising in New York

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Connie Sanders
Western States Finance Director
202/496-4825
202/496-4848 FAX
Pager TBD
Description: Fundraising in WA, OR, NV, MT, AZ, ND, SC & CO
Background: Fundraising consultant

Meredith Jones
Texas Regional Finance Director
201/228-6110
201/228-5543 FAX
Pager TBD
Description: Fundraising in TX and southern states
Background: Mike Andrews Finance Staff; Then-Senator Bentsen's Finance Staff

Griffin Schultz
Deputy Regional Finance Director
201/228-6110
201/228-5543 FAX
Pager TBD
Description: Fundraising in PA & NJ
Background: Senator Wofford and the Fundraising Management Group (FMG)

Hannah Bond
Southern California Finance Coordinator
Phone TBD
Pager TBD
Description: Assist with fundraising efforts in southern California
Background: Clinton/Gore '92 (Assistant to Rahm Emanuel, Susan Thomases)

Michael Marubio
Finance Coordinator, Roadshow
Phone TBD
Pager TBD
Description: Assist with fundraising efforts for various events around the country
Background: Executive Director of a non-profit organization; Harvard Business School

Tracy Newman
Finance Coordinator, Roadshow
Phone TBD
Pager TBD
Description: Assist with fundraising efforts for various events around the country
Background: Lead or Leave

CGRO-013465
Req. 5/28/97

FAX top 3
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Bob Cundall
home fax #

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CGRO-013466
Req. 5/28/97

ATTACH

Scenario 1

Projected Revenue and Expenditure Analysis (April Direct Mail Start, September event Start)1

Revenues

Source	April	May	June	July	August	September	October	November	December	'93 Totals	January	February	March	April	May	June	July	August	Wind Down
GFAC	800 000	0	0	0	0	0	0	0	0	800,000	0	0	0	0	0	0	0	0	
Direct Mail Receipts	2 745,975	1,285,500	347,033	1,125,707	247 485	413,124	1,189 033	332 605	0	7,981,492	336 252	1,352 103	338 253	338 253	386 664	386 664	386 683	0	
Direct Mail Match (95%)	0	0	0	0	0	0	0	0	0	0	7,297 389	N/A	321 339	1,284 496	321 340	321 340	367 331	367 331	367
Major Donor Receipts	50 000	100,000	100,000	100,000	100,000	5,395 000	2,300,000	2 300 000	1 555 000	12,000,000	1,025 000	1,280,000	1,165 000	1 105,000	0	0	0	0	
Major Donor Match (75%)	0	0	0	0	0	0	0	0	0	0	2,611,250	368 750	256 250	320,000	291 250	275 250	0	0	
Total Receipts	3,595,975	1,385,500	447,033	1,225,707	347,485	5,808,124	3,489,033	2,632,605	1,555,000	20,481,492	11,271,891	3,020,853	2,080,842	3,047,751	999,254	964,254	754,013	367,331	367,

5.4 million

Expenditures

Source	April	May	June	July	August	September	October	November	December	'93 Totals	January	February	March	April	May	June	July	August	Wind Do
Expenditures Subject to Limitation	155 000	155 000	155 000	155,000	155 000	353,750	353 750	353 750	353 750	2,190,000	5 353 000	5 353,000	5,353 000	2 500 000	2 500 000	2 000 000	2,000 000	2,750,000	
Additional Fundraising & Compliance	125,000	125 000	125,000	125,000	125 000	125 000	125 000	125 000	125 000	1,125,000	125 000	125 000	125 000	125 000	125 000	125 000	125 000	0	
Sub-Total	280,000	280,000	280,000	280,000	280,000	478,750	478,750	478,750	478,750	3,315,000	5,478,000	5,478,000	5,478,000	2,625,000	2,625,000	2,125,000	2,125,000	2,750,000	
Fundraising Expenses	910 312	674 332	204 547	458,001	218,359	950,849	679,279	385,283	265,125	4,747,087	232 066	718,354	415 904	109 317	101 067	71,188	5,007	0	
Exempt Legal & Accounting	80 000	80 000	80 000	127,000	127,000	127,000	127,000	127,000	127 000	1,002,000	315 000	315 000	315,000	315,000	314,000	300,000	300 000	300,000	1,500
Total Expenditures	1,370,312	1,034,332	564,547	866,001	625,359	1,556,599	1,285,029	991,043	870,875	9,064,097	6,025,066	6,511,354	6,208,904	3,049,317	3,040,067	2,496,188	2,430,007	3,050,000	1,500
Cash Balance at End of Month	2,325,663	2,676 831	2,554,317	2,914,023	2,636,149	6,887,674	9,091,678	10,733,240	11 417,365		16,664,190	13,173,669	9,045,627	9,044,061	7,003,248	5,491,315	3,815,321	1,132,657	

1 The projection allows for the maximum utilization of Direct Mail and Major Donor fundraising events prior to the January, February and March Primaries

***Note: Upon receipt of Matching Funds on January 1, 1996, the cash balance will be $21,326,004, assuming full amount of matching funds is available for payment.**

CGRO-013467
Req. 5/29/97

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Clinton/Gore '96 Finance Department
Proposed Budget for 1995 & 1996

Source	1995 April	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	95 Totals	1996 Jan	Feb	Mar	Apr	May	Jun	Grand Totals
Salaries	31,731	59,404	74,663	130,000	140,000	140,000	140,000	140,000	140,000	995,797	120,000	85,000	25,000	10,000	10,000	10,000	1,235,797
Salary Overhead (20% of Salaries)	2,374	8,705	14,932	24,000	26,000	26,000	26,000	26,000	26,000	180,011	24,000	17,000	5,000	2,000	2,000	2,000	232,011
Contract Labor	0	0	4,500	5,000	10,000	15,000	10,000	5,000	0	49,500	5,000	5,000	2,500	0	0	0	62,000
Telephone Usage/Monthly Costs	0	7,500	5,000	5,000	5,000	5,000	5,000	3,000	3,500	41,000	3,500	2,500	2,000	1,000	1,000	1,000	52,000
Parking	340	340	340	340	340	340	340	340	340	3,060	340	340	340	340	340	340	5,100
Computer Services	0	660	2,500	1,000	250	250	250	250	250	5,410	250	250	250	0	0	0	6,160
Computer Leases/Rent	1,924	636	0	0	0	0	0	0	0	2,560	0	0	0	0	0	0	2,560
Computer Equipment	0	50,000	10,000	10,000	500	500	500	500	500	72,500	250	250	250	0	0	0	73,250
Copiers/Copies	0	0	300	300	300	300	300	300	300	2,100	200	100	100	50	50	50	2,650
Fax Machines/Monthly Costs	0	0	100	100	100	100	100	100	100	700	50	50	50	50	50	50	1,000
Fax Machine Usage	0	0	500	500	500	500	500	500	500	3,500	500	500	250	250	150	150	5,300
Broadcast Fax	0	0	1,000	1,000	1,000	1,000	1,000	1,000	500	6,500	500	500	500	500	500	0	9,000
Papers	0	1,000	1,000	1,000	1,500	1,500	1,500	1,500	1,500	10,500	1,500	1,500	1,000	750	500	100	15,850
Cellular Phones	1,142	159	1,000	1,000	1,000	1,000	1,000	1,000	1,000	8,301	1,000	1,000	1,000	500	0	0	11,801
Telephone Calling Cards	0	0	750	750	1,000	1,000	1,000	1,000	1,000	6,500	1,000	750	500	250	0	0	9,000
Postage (Non Allocable Dist)	1,763	220	1,000	1,000	1,000	1,000	1,000	1,000	1,000	8,983	1,000	1,000	750	500	0	0	12,233
Overnight Delivery	0	500	500	500	500	500	500	500	500	4,000	500	500	500	250	150	100	6,000
Shipping	14	0	50	50	50	50	50	50	50	364	50	50	50	50	50	50	664
Courier Service	0	0	150	150	150	150	150	150	150	1,050	150	150	150	150	150	150	1,950
Subscriptions	0	100	100	100	100	100	100	100	100	800	100	100	100	100	100	100	1,400
Supplies	0	0	500	500	500	500	500	500	500	3,500	250	250	250	250	150	150	4,800
Printing	0	6,887	750	500	500	500	500	500	500	10,637	500	500	500	250	250	250	12,887
Equipment Purchases	0	0	500	200	200	200	200	200	200	1,700	0	0	0	0	0	0	1,700
Paraphernalia/Trimmers/Decorations	0	0	0	10,000	5,000	10,000	5,000	5,000	5,000	40,000	2,500	2,500	0	0	0	0	45,000
Catering	521	7,192	100	100	100	100	100	100	100	8,413	100	100	100	100	100	100	9,013

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Airfare/Travel (Other than events)	5,534	2,019	10,000	20,000	20,000	15,000	15,000	10,000	5,000	102,553	5,000	10,000	10,000	5,000	2,500	1,000	136,053
Other Transportation (Auto)	0	413	1,000	1,000	1,000	1,000	1,000	1,000	1,000	7,413	1,000	1,000	1,000	1,000	500	500	13,413
Hotel/Travel Expenses	0	0	1,000	1,000	1,000	1,000	1,000	1,000	1,000	7,000	1,000	1,000	1,000	1,000	500	500	12,000
Field Office Expenses	0	0	1,000	1,500	2,000	3,000	3,000	3,000	3,000	16,500	2,000	2,000	1,500	1,000	0	0	22,000
Servicing Events	0	0	45,000	5,000	5,000	5,000	5,000	5,000	2,500	72,500	2,500	2,500	1,500	1,500	0	0	80,500
Miscellaneous Expenses	0	103	500	500	500	500	500	500	500	3,603	500	500	500	500	500	500	6,603
Lay Leadership Expenses	0	0	5,000	5,000	5,000	5,000	5,000	5,000	4,656	34,656	5,000	5,000	5,000	2,500	1,000	1,000	54,156
Presidential Events	0	0	525,000	65,000	65,000	915,000	450,000	185,000	0	2,205,000	Note: Major Donor Fundraising Events for 1996 will be addressed in the Fall of 1995						2,205,000
Vice Presidential Events	0	14,800	100,000	25,000	Note: Major Donor events TBD with political travel				45,000	184,800							184,800
First Lady Events	0	10,000	0	15,000					25,000	50,000							50,000
Tipper Gore Events	0	0	0	5,000					0	5,000							5,000
Cabinet Events	0	0	5,000	10,000	10,000	5,000	10,000	10,000	0	50,000							50,000
Direct Mail	171,000	345,410	194,400	286,593	97,848	498,798	115,444	110,868	53,000	1,873,371	76,963	327,013	76,963	76,963	89,188	120,988	2,641,349
Totals	216,345	516,048	1,088,134	633,683	402,938	1,654,798	801,534	521,958	334,246	6,079,681	257,283	468,983	138,603	104,663	108,715	139,078	7,300,000

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CGRO-013469
Req. 5/28/97

28 November 1995

MEMORANDUM TO	THE PRESIDENT VICE PRESIDENT
CC	LEON PANETTA ERSKINE BOWLES MAGGIE WILLIAMS RON KLAIN DAVID STRAUSS DOUG SOSNIK KAREN HANCOX CHAIRMAN DODD CHAIRMAN FOWLER MARVIN ROSEN SCOTT PASTRIK
FROM	HAROLD ICKES
RE	Fundraising efforts for DNC media

Non-Responsive Material Has Been Redacted

On 28 November I met with Marvin Rosen, Scott Pastrik, Richard Sullivan, Terry McAuliffe, Laura Hartigan, Karen Hancox and Doug Sosnik to get a realistic assessment of the DNC's financial situation (especially on a cash flow basis) for the balance of calendar '95, especially as it relates to the media fund.

1. Based on our 28 November meeting, Marvin Rosen thinks it unrealistic to expect the raising of new money that will actually be deposited during calendar 1995 in excess of $1.2 million. This amount can be raised, in his opinion, only under the following circumstances.

- approximately 20 phone calls by the President
- approximately 15 phone calls by the Vice President

CGRO-0273
Req. 2/3/97

- approximately 10 phone calls by HRC
- one additional event during December by the President in D.C.
- two additional events during December by the VP

2. In addition to the foregoing, the following events must be scheduled if the monies estimated for the original DNC operations budget/media fund are to be realized during 1995.

- lunch with the President during December (to replace a similar lunch on the President's November schedule which was bumped)

- dinner with the President during January

3. Finally, an additional Re-elect lunch needs to be scheduled during December with the President to replace a Re-elect lunch that was on his schedule in November but which was bumped.

Even if these phone calls are made and new events are scheduled (assuming the events are scheduled this week to be held prior to Christmas), there will still be very serious problems with cash flow.

If all of the foregoing is accomplished, Marvin expects to be able to raise $1.2 to $1.5 million in new money, which would leave the DNC short by approximately $1.5 million for the $3 million in additional media spending for December. Thus, the DNC would end 1995 with approximately $5.5 million in debt, at a minimum. (If no additional media, over the original $10 million is aired during 1995, the DNC will end 1995 with a minimum of $4.0 million in debt). In the event that no new monies are raised, and if an additional $3 million is spend for media during December, the DNC will end 1995 with at least a $7 million debt (assuming that the events described in paragraph number 2 above are rescheduled during December and January).

THE PRESIDENT HAS SEEN
8-5-96

96 AUG 21 P1:23

2 August 1996

MEMORANDUM TO THE PRESIDENT
THE VICE PRESIDENT

CC: Leon Panetta
Evelyn Lieberman
Maggie Williams
Ron Klain
Doug Sosnik
Karen Hancox
Peter Knight
Terry McAuliffe
Laura Hartigan
Chairman Dodd
Chairman Fowler
B.J. Thornberry
Marvin Rosen
Scott Pastrick
Richard Sullivan
Brad Marshall

From: Harold Ickes

Re: DNC budget/fundraising meeting of 1 August 1996

At the weekly DNC budget/fundraising meeting on 1 August it was concluded that if the DNC is to be able to spend the $128 million budgeted for calendar 1996 (January - October), approximately $31 million of "federal" dollars must be raised from major donors between now and the end of October. This assumes that the gross receipts from direct mail will only be $25 million rather than the original anticipated $30 million.

To date, $15 million in federal monies have been raised by major donors since the first of the year and another $15 million gross has been raised by direct mail (all of which is federal). Since 55% (on the average) of the $128 million must be federal money, a total $71 million in federal money must be raised if $128 million is to be spent.

Since only $15 million federal dollars have been raised from major donors for the period January through the end of July, it seems to be an almost impossible task to raise an additional $31 million in federal money from major donors between now and the

[redacted]

CGRO-0660
Req. 2/3/97

end of October. If that amount of money cannot be raised, total overall spending of the DNC will have to be substantially reduced.

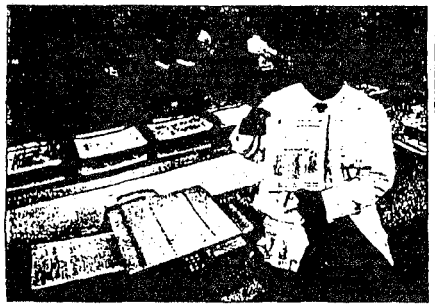
(millions)
71 - total "federal" needed (55% x $128 million)
- 15 - major donor federal deposited as of 7/31
56 - subtotal
- 15 - gross direct mail deposited as of 7/31 (all federal)
41 - subtotal
10 - additional gross direct mail expected by 10/31
31 - federal to be raised from major donor between 8/1 and 10/31 if DNC is to be able to spend full $128 million.

Much of whether or not the $31 million federal from major donors can be raised depends upon the success of the birthday party in August. Marvin Rosen, however, is very concerned that if there are not sufficient fundraising events scheduled in October (which will be extraordinarily difficult to schedule given the probable 3 week debate schedule in early October and the press of campaigning for the remainder of October), it will be, in his words, "very difficult" to raise all of the $31 million federal needed from major donors. It is estimated at this point that there is a deficit of approximately $8 million in federal dollars, that is, projected total of federal dollars from major donors from scheduled events between now and the end of October, is $23 million -- $8 million below the $31 million needed to permit the $128 million to be spent.

CGRO-0661
Req. 2/3/97

LOS ANGELES BUSINESS JOURNAL

VOLUME 16 NUMBER 12 WEEK OF MARCH 28 - APRIL 3, 1994 $1.50



Just the fax: Chung shows off computer system for mass-faxing

Chung can send fax to thousands at same time – but who wants to?

BY ANNE RACKHAM
Government Editor

In the fall of 1992, Johnny Chung had about run out of ideas.

He had spent all his money, earned by owning and operating computer retail stores, on his invention – a computer information system that could fax documents to thousands of locations at once. He had spent years in development and many months trying to convince companies to sign up for the service, but no one was interested.

His wife, Kathy, finally told him to "throw out his machine and get a job." He went out into his backyard and cried.

But shortly thereafter, while watching a debate between George Bush and Bill Clinton on television, it came to him – political candidates and governments send out more

Please see Fax page 23

Major retailers, malls come slogging back from quake

Some use rebuilding as an opportunity for remodeling

BY KARA GLOVER
Staff Reporter

Nearly all the major retailers whose outlets were damaged in the Jan. 17 earthquake, both in malls and freestanding, have either already reopened or plan to reopen this year.

"I think all the majors (in the San Fernando Valley) will be back," said Richard Leyner, vice president of the Encino-based brokerage firm Zagrowski-Thiard Inc.

And Matthew May, director of retail for the Westside office of Beitler Commercial Real Estate Services, said he wasn't aware of any retailers on the Westside that weren't planning to reopen.

Topanga Plaza, Promenade Mall, Sherman Oaks Galleria, Fashion Square Sherman Oaks, and Fallbrook Mall, all of which suffered at least some damage during the quake, are all at least partially open for business.

Meanwhile, Northridge Fashion Center, the mall most severely damaged by the quake, remains closed.

At Topanga Plaza in Woodland Hills, 100 out of a total of 116 stores are operating, including an earthquake-battered Nordstrom, according to a mall statement.

Nordstrom reopened Feb. 26 "right on schedule," after glass shelving was replaced, the marble flooring was repaired and the carpet was cleaned, said Nordstrom spokeswoman Caroline Brown. Replacement of the store's brick facade is expected to be completed within a few weeks.

The plaza's three other anchors – Broadway, Robinson's-May and Montgomery Ward – remain closed. A remodeled Broad-

Please see Stores page 35

FRONT LINES

Blake

DNC 1096988

Fax: Copies go simultaneously to many publications

Continued from page 1

faxes than private companies. This could be his market. When Kathy agreed, there was no stopping him.

Chung called Clinton's mansion and offices in Arkansas non-stop, and finally he flew to Little Rock, where he said he banged on the door of the then-governor's home. He was fortunate enough to meet Hillary Rodham Clinton and hand her some information.

In April of 1993, Mrs. Clinton sent Chung a letter saying he was "on the right track." That letter from the First Lady was all Chung needed to get his foot in the door at Gov. Pete Wilson's office in Sacramento.

The governor's press people thought Chung's system would be just the thing to handle the hundreds, sometimes thousands, of press releases they send by facsimile machine every day.

A few minor adjustments later, the governor's office signed on as Chung's first client six months ago. Now Automated Intelligent Systems Inc. of Torrance has government and political clients in 39 states and is continuing to grow.

It is an American dream-come-true for the 40-year-old Chinese immigrant from Taiwan, who became a U.S. citizen six years ago.

"America really is the land of opportunity," said Chung. "You can walk into any office and show them what you've got. But you need a lot of patience.

"Once I got California and Florida (governors' offices signed up as clients), all the doors opened."

In addition to sending out faxes to bodies of recipients simultaneously, Chung's computer keeps track of all its documents by number and can retrieve them for fax recipients.

At the governor's office in California, the press deputies compile weekly lists of all their news releases by number and topic and have AISI send a list to journalists. If a reporter needs a particular news release, he can call the system, punch in a number, and the computer will fax him the requested document.

The system keeps fax recipient numbers in its memory by group – for example, Los Angeles print media, Orange County broadcast media, editorial page editors, public relations agencies or state agencies. Clients fax requests, specifying which group or groups to fax their document(s) to.

If a job request is faxed to Chung's AISI and isn't acted on by staff within two minutes, the computer beeps the chief engineer. If it still isn't acted on in five minutes, the computer beeps President and Chief Executive Chung, and everyone else is in trouble.

The computer also keeps track of everyone it sends faxes to and how many attempts it made to dial each number. If a recipient's primary number fails, the computer will dial a back-up secondary number.

Wilson's press office staff says it has been thrilled with the performance of AISI's staff and its system, especially during recent natural disasters.

Although about 85 percent of AISI's business involves news releases, Chung plans eventually to branch out into a variety of government document services. For example, he has been talking to the Centers for Disease Control in Atlanta about taking over the faxing of health-hazard updates to travel agents, communicable disease reports to health care providers, and HIV newsletters to various agencies.

"With governments cutting staff and budgets, my idea was: 'How could you do this (disseminate information) better and cheaper?' And it is cheaper. It costs them less than 50 cents per page," said Chung. "I developed it myself from scratch. That machine cost me $2 million. The machine is the one and only one."

Not to worry – Chung said he has "spare parts" at another location and could recreate the system in seven or eight days.

Born in Taiwan, Chung moved to Costa Rica at the age of 12 with his Presbyterian missionary parents. He returned to Taiwan to go to college, where he earned a degree in American literature. Then it was off to the University of California at Los Angeles.

Chung said his father, a medical doctor, wanted Chung to earn a medical degree. When Chung pursued an advanced degree in engineering, his father pulled the financial plug, and Chung dropped out of school to earn a living selling Apple computers, he said.

In 1978, Chung opened his first Iris computer retail store in Monterey Park. It quickly grew into 18 stores across the Southland. But Chung said sales started dropping off by 1985; plus he had a problem with dishonest store managers. So he decided to close down all but his first store and sink his money into his new idea.

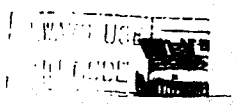
"I was looking for a business with few employees and no inventory that was recession-proof," he said.

AISI is a privately held company with 20 shareholders (family and friends) and a board of directors. Chung said he may go public one day, but he doesn't appear to be in too much of a hurry.

Although he is not required to release financial information, Chung said the company was profitable three months after signing up its first client.

DNC 1096989

THE WHITE HOUSE
WASHINGTON



THE WHITE HOUSE

April 26, 1993

Mr. Johnny Chung
President & CEO
Telform Inc.
100 North Barranca Avenue
Seventh Floor
West Covina, California 91791

Dear Mr. Chung:

Thank you for your letter and my apologies for not getting back to you sooner.

It appears from the correspondence you have had with federal and state officials, and with the private sector, that you are already on the right track. Nevertheless, I wish you good luck with your innovative system.

Sincerely yours,

Hillary

Hillary Rodham Clinton

180

F 0018591

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-8585 • Fax: (310) 328-8881

October 11, 1994

Reta Lewis
Special Assistant,
Political Affairs
The White House
Washington, D.C. 20506

Dear Reta:

I have received a very nice letter from President Clinton, thank you for your assistance. Due to my busy schedule, I was unable to meet with you during my last D.C. trip. However, I would still like to update my current progress with you.

I am in the process of setting up our Washington D.C. office. This will allow us to work closely together. We are currently inviting 50 Asian American businesses across the nation to join forces with us. We will fully utilize the information given by the Business Leadership Forum to create more opportunities for these business leaders. Our D.C. office will be located on Pennsylvania Avenue, and we are planning for grand opening in the early part of 1995.

I also want to inform you that I am arranging a meeting for Chairman Y.C. Wang with President Clinton. Chairman Wang will be arriving on the 15th of the October, and will be staying approximately two weeks. I am discussing with Mr. David Wilhelm regarding the set up of this meeting.

Recently, I received a political report card from DNC on economic achievements under Clinton's Administration. I will discuss with you further on this issue as how to broadly utilize this information. However, I believe that this will be a big plus for both the DNC and The White House.

Again, your help at the State Dinner is greatly appreciated. We will keep in touch.

Best regards,

Johnny Chung
Chairman/CEO, AISI

JC:jl

Hi you are too busy and I can't find you and speak with you over the phone this is the only way to tell you what I'm doing !!!

BUILDING THE U.S. FAX HIGHWAY TODAY

JCH12149

AISI

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February 27, 1995
(Via Fax)

Mr. Richard Sullivan
DNC
(202)863-7187

Dear Richard,

How are you? I am going to need your help again. I am bringing with me the delegation from China. This is a group of very important and powerful business leaders from China. They will be in D.C. from 3/7 to 3/11 and will be staying at J.W. Marriott, (202) 393-2000, 1331 Pennsylvania N.W., Washington DC. Enclose please find the name list and their personal information.

As I have mentioned on the phone, their main purpose would be as follows:

1.) Meet President Clinton — Meet Don Fowler

2.) Meet Vice President Al Gore

3.) Have lunch at the Mess (White House)

4.) Tour the White House

5.) Meet Secretary Ron Brown

Please help me make arrangements accordingly. Thank you in advance for all your help. I will see you soon.

Sincerely,

Johnny Chung
Chairman/CEO

JC.iw
Encl.

EXHIBIT
MLB-30

DNC 3233326

Name List of Delegation

1.) **Hongye Zheng**
Chairman, China Council for the Promotion of International Trade (CCPIT)
Chairman, China Chamber of International Commerce (CCOIC)

2.) **Huaren Sheng**
President, China Petro-Chemical Corporation

3.) **Jichun Huang**
Vice President, China International Trust and Investment Corporation

4.) **Renzhong Wang**
Vice Chairman & President, Shanghai AJ Shareholding Corporation

5.) **James J. Sun**
Young Entrepreneur of Xinjiang, self made multi-millionaire, Urumqi Taihe Industry Co.

Entourage

1.) **Jianlong Yu**
Chief, American & Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

2.) **Suxin Tang**
Secretary to Mr. Huaren Sheng

3.) **Jie Tang**
Interpreter, SINOPEC

AISI Representatives

1.) **Johnny Chung** - Chairman/CEO

2.) **Art Liang** - Managing Director/Executive V.P.

DNC 3233327

Resume

Zheng Hongye

Mr. Zheng Hongye was born in Harbin, Heilongjiang Province in September 1929. He was engaged in trade and economic affairs in the Northeast Region of China from 1947 to 1954; transferred to the China Council for the Promotion of International Trade(CCPIT) in 1955 and worked as Deputy Division Chief successively in the Department of Foreign Exhibition in China, Liaison Department and Department of Chinese Exhibitions Abroad; served as Commercial Councilor of the Chinese Embassy in Australia and then in Greece from 1973 to 1979; became Deputy Director and then Director of the Liaison Department of CCPIT in 1979; appointed Vice Chairman of CCPIT in 1981; served as Minister-Counsellor(Commercial) of the Chinese Embassy in Japan 1984; resumed his post as Vice Chairman of CCPIT after he returned from Japan in 1986; concurrently became Vice Chairman of the China Chamber of International Commerce(CCOIC) in 1988. He assumed the post as Acting Chairman of CCPIT and CCOIC since October 1989.

Mr. Zheng Hongye is a member of the Seventh and Eighth Chinese People's Political Consultative Conference, Chairman of the China International Economic and Trade Arbitration Commission, Chairman of the China Maritime Arbitration Commission, Chairman of the Economic and Trade Coordination Committee for the Two Sides of the Straits, Chairman of the Association of China Foreign Service Trade and a concurrent professor of Xiamen University. Mr. Zheng Hongye is also Chairman of the China Committee of the International Chamber of Commerce.

Sheng Huaren

Mr. Sheng Huaren, born in September 1935, is President of China Petro-Chemical Corporation, Chairman of China International United Petroleum and Chemicals Co. Ltd, and concurrently Vice Chairman of China-Korea Economic Council.

Mr. Sheng was born in Yancheng city, Jiangsu Province. He studied in Subei Cooperative Insititute for Cadres in Yangzhou city, Jiangsu Province in 1951. He used to be a statistician and plan-drafter in Subei General Cooperative Commune and the Finance and Economy Committee of Subei Administrative Office; apprentice, technician and deputy site director of Nanjing Construction Company; Deputy Director of the Long-term Planning Department in the Ministry of Combustible Chemical Industry and the Ministry of Petro-chemical Industry; Vice President of China Petro-chemical Corporation.

DNC 3233328

Huang Jichun

Mr. Huang Jichun, Director and Vice President of China International Trust and Investment Corporation(CITIC), was born in 1933. He graduated from the University of Northeast Technology, China in 1955 and attended the Executive Program in Business Administration(EPBA) of Columbia University, U.S.A. in 1989. Mr. Huang is acting also as a professor and senior engineer as well as the Executive Director of China Nonferrous Metals Society, a member of American Society of Metals and a member of Chinese Society of Investment.

In CITIC, Mr. Huang is in charge of investment and trade both at home and abroad as well as enterprise management.

Mr. Huang's professional capability is specifically excellent in the metal and material fields. He used to be responsible for the scientific and technical R & D, production management and foreign trade of nation-wide non-ferrous metals sector during 1983 to 1987 as Vice President of China National Non-ferrous Metals Industry Corporation. Mr. Huang was also heavily engaged in elaborating the long-term strategic plan for the scientific and technical development of the Chinese metallurgical industry while working in the Ministry of Metallurgical Industry from 1956 to 1982. He is very experienced in production, management and foreign trade and can manage English as a working language very well.

Wang Renzhong

7/1992-Present	Shanghai AJ Corporation, Shanghai Vice Chairman, President(C.E.O.)
11/1990-7/1992	Shanghai Patriotic Construction Corp. Vice Chairman, President
2/1986-11/1990	Shanghai Investment & Trust Corp. Board Director, Executive Vice President in charge of international trading, investment and other technology related business
1/1985-2/1986	Shanghai Investment & Trust Corp. Senior Vice President responsible for all international trading
2/1976-12/1984	Bureau of Aerospace Industry, Shanghai Director of Quality Assurance, Chief Production Engineer and Standing Member of Science and Technology Commission
3/1963-2/1976	Plant No.155 of the China Aviation Industry Ministry, Harbin

DNC 3233329

8/1952-3/1963	Plant No. 120 of the China Aviation Industry, Harbin Superintendent, Production Engineer
Technical Title:	Researcher
Education:	Graduate of the Yenching University, Beijing
Personal:	Born in China on May 1932, Married

DNC 3233330

Resume

James J. Sun

Mr. Sun was born on November 28, 1962 in Her Nan Province, China. He is the President of Xinjiang Taihe Enterprise Group Co. Ltd. and also a self made millionaire. He formed the Taihe Enterprise in 1990. Currently the Taihe Group consist of Taihe Real Estate Co, who's projects includes the four star Taihe Hotel in Urumqi, Taihe Kangle Developing Co. and Taihe Battery Co.

DNC 3233331

AISI Representatives

1.) **Johnny Chung** - Chairman/CEO

2.) **Art Liang** - Managing Director/Executive V.P.

3.) **Irene Wu** - Delegation Administrtor

4.) **George Liu** - Special Assistant to Chairman (East Coast)

5.) **David Chen** - Special Assistant to Chairman (Beijing)

6.) **Nancy Zhao** - Secretary to Chairman/CEO

AISI

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February 28, 1995
(Via Fax)

Ms. Ann McCoy
Visitor's Office
The White House
Fax: (202) 456-2370

Dear Ann,

How are you? I would like to request for your assistance again. I am bringing with me the delegation from China. This is a group of very important and powerful business leaders from China. They will be in DC from 3/7 to 3/ 11, and as usual, please arrange for a tour of the White House. I have asked Mr. Richard Sullivan, Mr. Eric led of DNC and Mr. Mark Middleton to assist me in arranging a meeting with President Clinton, Vice President Al Gore and a lunch at the Mess in the White House. It would be ideal if you could arrange a tour either before or after the lunch at the Mess.

Thank you very much for all your help. See you soon.

Best regards,

Johnny Chung
Chairman/CEO

JC:iw

FAXED

JCH15012

To Zheng Hongye
with best wishes,

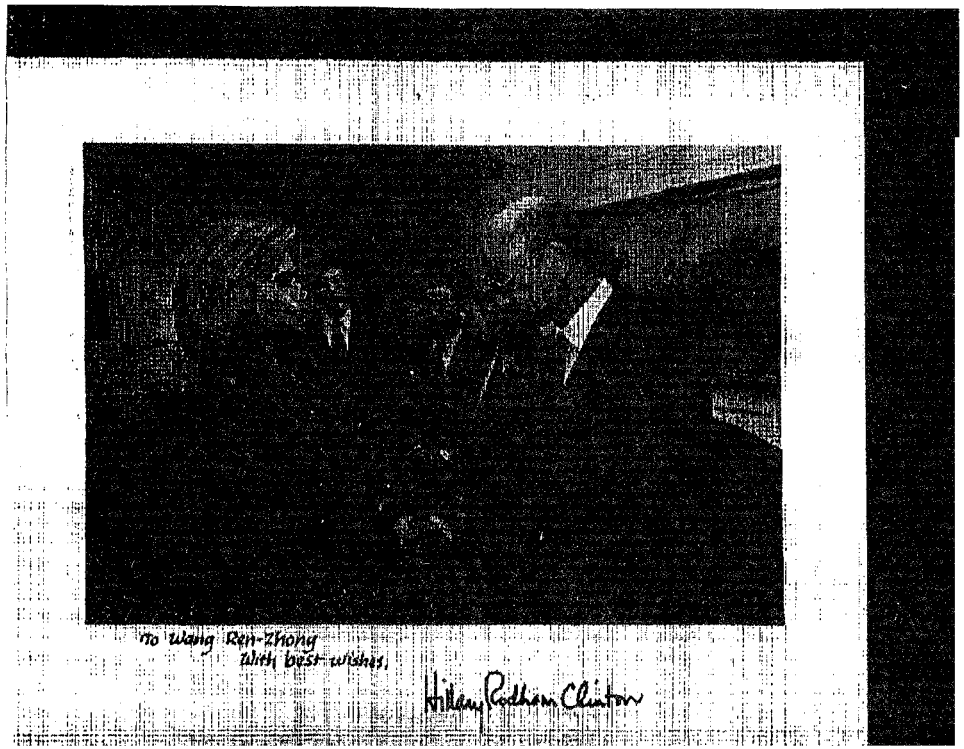
Hillary Rodham Clinton

EOP 029612

Hillary Rodham Clinton
To Kay Schanberg
With best wishes,
Graduation day

EOP 029613

EOP 029614



EOP 029615

Per
Betty—

THE WHITE HOUSE
WASHINGTON

Johnny Chung's
friends presented this
on his behalf when
they visited on
Radio Address

thank you to
Johnny Chung

They don't know
the friend's
names

EOP 063825

CHUNG

GIFT UNIT CORRESPONDENCE TRACKING SHEET

Date gift presented	3/12/95
Date gift received in Gift Unit	
Date contact made with State Dept regarding salutation and address	—
Date information received from State Department	—
Date gift draft written	4/26/95
Date of internal editing	4/27/95 DWB
Date sent to NSC for clearance	—
Date returned from NSC	—
Date sent to editing/ Presidential support/FLO office	4/27/95 DWB
Editing Date	
Typing Date	
Final Approval	

Letter should go to Johnny Chung

Thanking Johnny for the jade his friend brought.

WHITE HOUSE GIFT REGISTER

GIFT INTENDED FOR

President [✓] Both/All [ ]

First Lady [ ] Chelsea [ ]

DONOR INFORMATION

Name: Friends of Johnny Chung (from China)

Address:

Phone:

PRESENTATION

Date: 3/12/95 Event: Radio Address

Handed to President [✓] Other Method [ ]

Gift Description: Large Heart Shaped piece of Jade - w/ stand.

Send Gift and Register to OEOB, Room 457 x7133

EOP 063827

March 24, 1995

Mr. Johnny Chung
Chairman and CEO
Automated Intelligent
Systems, Inc.
Suite 809
2771 Plaza Del Amo
Torrance, California 90503

Dear Johnny:

Thanks so much for the beautiful sweaters. You were kind to remember Hillary and me with these special gifts.

We deeply appreciate your thoughtfulness and send our best wishes.

Sincerely,

BILL CLINTON

BC/HCW/DWB/bws (Corres. #2119675)
(3.chung.j)

cc: WH Gifts
cc: Maggie Williams

EOP 063828

GIFT UNIT-DRAFT OF BC LETTER

BWB

INITIALS: BC / chw / **DOCUMENT TITLE:** /gifts/draft/chung.j.chw

DRAFT DATE / LETTER DATE: Mar 15 1995 / **CORRESPONDENCE #:** 2119675

CLEAR WITH: **WHCC:** **CC:** WH Gifts
Maggie Williams

CORRESPONDENCE ADDRESSED TO:
Mr. Johnny Chung
Chairman/CEO
Automated Intelligent
Systems, Inc.
Suite 809
2771 Plaza Del Amo
Torrance, California 90503

ENCLOSURES AND SPECIAL INSTRUCTIONS:

Dear Johnny:

Thanks so much for the beautiful sweaters. You were kind to remember Hillary ~~think of the First Lady~~ and me with these ~~in this~~ special gifts ~~way.~~

We ~~I~~ deeply appreciate your thoughtfulness and send our best wishes. ~~wish you the best.~~

Sincerely,

EOP 063829

MAR 23 1995

Chung GW

THE WHITE HOUSE

WASHINGTON

GIFT UNIT CORRESPONDENCE TRACKING SHEET

Date gift presented	3/9
Date gift received in Gift Unit	3/14
Date contact made with State Dept regarding salutation and address	–
Date information received from State Department	–
Date gift draft written	3/15
Date of internal editing	3/22/95 DWB
Date sent to NSC for clearance	–
Date returned from NSC	–
Date sent to editing/ Presidential support/FLO office	3/22/95 DWB
Editing Date	
Typing Date	
Final Approval	

EOP 063830

WHITE HOUSE GIFT REGISTER

GIFT INTENDED FOR

President [X] Both/All [ ]

First Lady [ ] Chelsea [ ]

DONOR INFORMATION

Name: Johnny Chung

Address: 277 Plaza Del Amo, Suite 809, Torrance, CA 90503

Phone: (310)328-8585

PRESENTATION

Date: 3-9-95 Event: meeting

Handed to President [ ] Other Method [X] Handed to Margaret Williams

Gift Description: Sweater

Send Gift and Register to OEOB, Room 457 x7133

EOP 063831

WHITE HOUSE GIFT REGISTER

GIFT INTENDED FOR

President [ ] Both/All [ ]

First Lady [X] Chelsea [ ]

DONOR INFORMATION

Name: Johnny Chung

Address: 2771 Plaza Del Amo, Suite 809, Torrance, CA 90503

Phone: (310) 328-8585

PRESENTATION

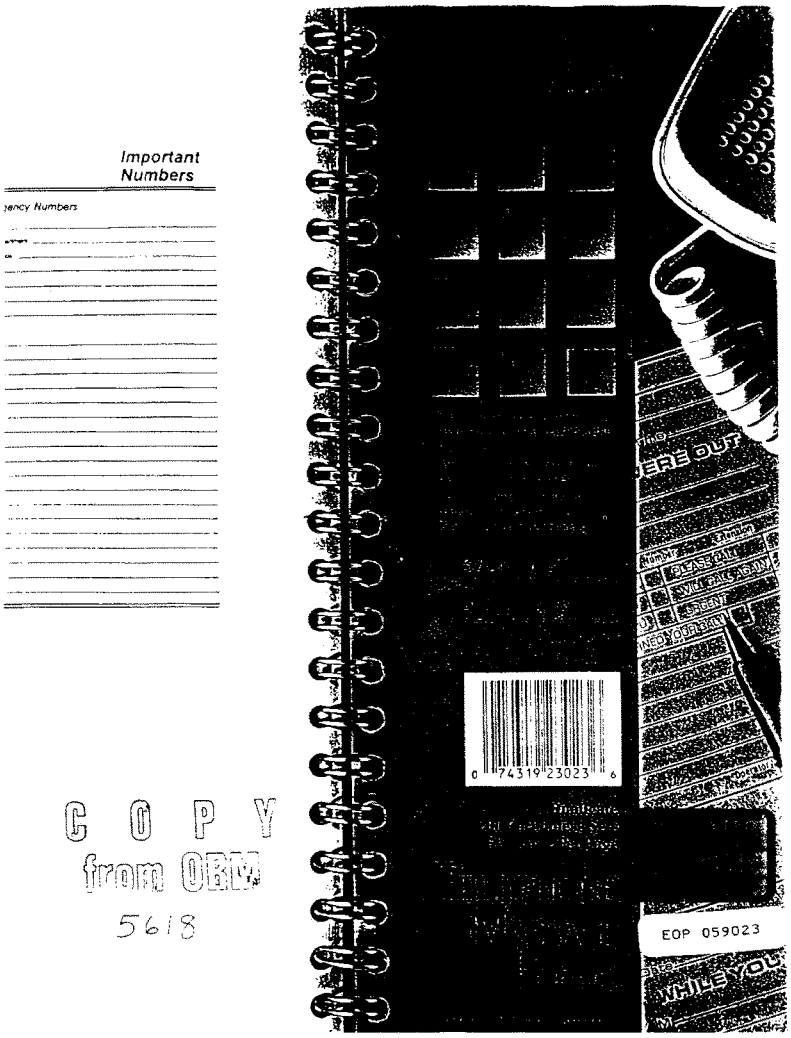
Date: 3-9-95 Event: Meeting

Handed to President [ ] Other Method [X] Handed to Margaret Williams

Gift Description: Two Sweaters

Send Gift and Register to OEOB, Room 457 x7133

EOP 063832



C O P Y
from OBM
5618

To: Fran

Date: 4/3 Time: 4:50

WHILE YOU WERE OUT

M. Johnny Chung

of

Phone: 1803-799-1736

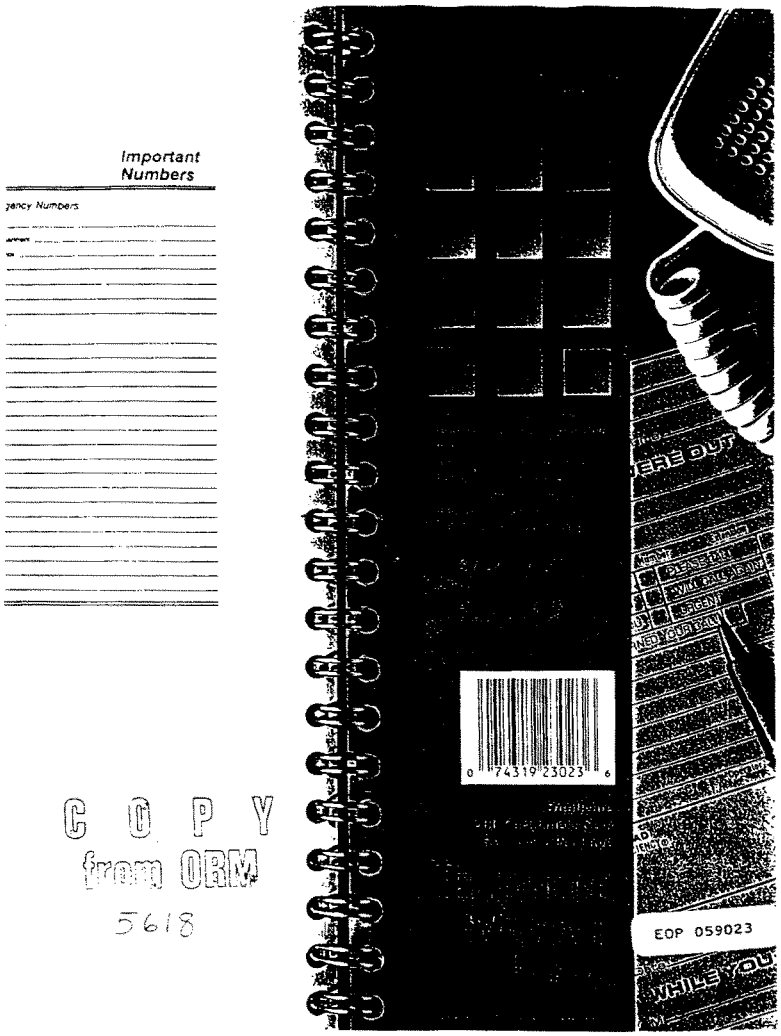
Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message: re: Pictures
(incidentally he called for Jim
who I think here is then
he called for you)

Operator

AMPAD EFFICIENCY® 23 EOP 059024



C O P Y
from ORM
5618

To [redacted]

Date 4-7 Time [illegible]

WHILE YOU WERE OUT

M. Irene

of AISI

Phone

Area Code Number Extension

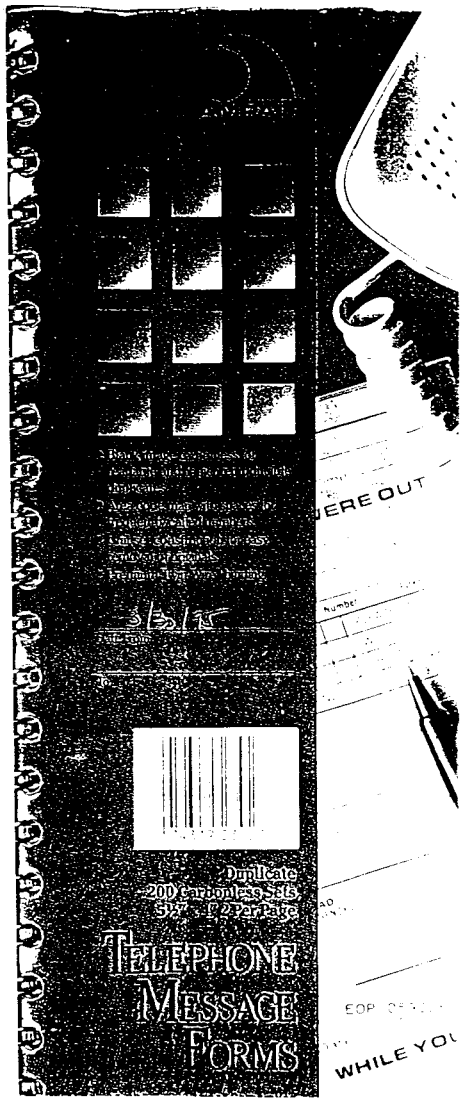
TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Pictures

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

EOP 059025



COPY
FROM GRM
5618

To: Maria

Date: 4/7 Time: 12 40

WHILE YOU WERE OUT

M. Shane (Gateway)

of (AISI) (Campaign Office)

Phone 310-328-3883

Area Code Number Extension

TELEPHONED		PLEASE CALL	✓
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message: Date of Photo

3/11/95

EB

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 11:24 am
SENDER: Suettinger, Robert L.
SUBJECT: Subject: RE: PHOTOS? [UNCLASSIFIED]
TO: Darby, Melanie B.

CC: Roth, Stanley O.

The joys of balancing foreign policy considerations against domestic politics. . . I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the DNC, who am I to complain? Neither do I see any unalloyed benefit, either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide (present or former) Chinese officials, with the possible exception of James Y. Sun, "young entrepreneur and self-made millionaire." Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

But a caution – a warning of future déjà vu. Having recently counselled a young intern from the First Lady's office who had been offered a "dream job" by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler, and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials. My concern is that he will continue to make efforts to bring his "friends" into contact with the POTUS and FLOTUS – to show one and all he is a big shot, thereby enhancing his business. I'd venture a guess that not all his business ventures – or those of his clients – would be ones the President would support. I also predict that he will become a royal pain, because he will expect to get similar treatment for future visits. He will be persistent.

Bob

From: Darby, M. Brooke
To: @ASIA - Asian Affairs
CC: /R, Record at A1
Subject: PHOTOS? [UNCLASSIFIED]
Date: Friday, April 07, 1995 01:12 PM

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel. (310) 328-3883 • Fax. (310) 328-4196

April 5, 1995
(Via Fax 202 863-8174)

Mr. Don Fowler
Chair
Democratic National Committee
430 S. Capitol St. S.E
Washington, D.C. 20003

Dear Don,

I have an important issue here that needs your assistance. As you always know, I am 100% supportive of the DNC and I am always delighted to work with you on every occasion. The China Business Delegation led by Chairman Zheng Hongye met with President Clinton and took some pictures after the radio address on March 11, 1995. It's been over three weeks, I have not seen any of the pictures. I have learned from Mr. Richard Sullivan of DNC that the National Security Council is holding on to those pictures.

In my opinion, if we allow them to take the pictures with our President then we should be courteous enough to let them have the pictures. I am going to China next week and I do need to bring those pictures with me. I have run out of excuses to tell them why the pictures are taking forever. I really appreciate your help in solving this minor issue.

I look forward to seeing you this weekend at Mr. Steven Spielsberg's party. Thank you again for everything.

Sincerely,

Johnny Chung
Chairman/CEO
AISI

Thank you again!

JC:rw

CC: Ms. Carol Khare

EXHIBIT
MW-36

BUILDING THE U.S. FAX HIGHWAY TODAY

DNC 3102463

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

April 5, 1995
(Via Fax 202 456-6244)

Margaret Williams
Assistant to the President and
Chief of Staff to the First Lady
The White House
Washington, D.C. 20506

Dear Ms. Williams,

I have an important issue here that needs your assistance. As you always know, I am 100% supportive of the First Lady's Office and I am always delighted to work with DNC at every occasion. The China Business Delegation led by Chairman Zheng Hongye met with President Clinton and took some pictures after the radio address on March 11, 1995. It's been over three weeks, I have not seen any of the pictures. I have learned from Mr. Richard Sullivan of DNC that the National Security Council is holding on to those pictures.

In my opinion, if we allow them to take the pictures with our President then we should be courteous enough to let them have the pictures. I am going to China next week and I do need to bring those pictures with me. I have run out of excuses to tell them why the pictures are taking forever. I really appreciate your help in solving this minor issue.

I look forward to seeing you this weekend at Mr. Steven Spielsberg's party. Thank you again for everything.

Sincerely,

Johnny Chung
Chairman/CEO
AISI

Thank you!

JC:lw

FAXED

JCH15014

DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. Dodd
General Chair

OFFICE OF THE CHAIRMEN

PH 202-863-8121
FAX 202-863-8174

FAX COVER SHEET

DATE:_____ TIME:_____

TO: Johnny Chung

FAX:_____ # OF PAGES (including cover): 1

FROM: Carol Khare

SUBJECT: photo

IF YOU HAVE ANY TROUBLE WITH THIS TRANSMISSION,
PLEASE CALL _____ AT (202) 863-_____

COMMENTS: The White House assures me that you now have the pictures — hurray! If you don't, give me a call. Have a good trip!

___ PLEASE VERIFY RECEIPT OF THIS DOCUMENT IMMEDIATELY

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. THIS MESSAGE MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS BELOW VIA THE U.S. POSTAL SERVICE. THANK YOU.

Democratic Party Headquarters • 430 South Capitol Street, S.E. • Washington, D.C. 20003 • 202.863.8000 • FAX: 202.863.8174
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JCH15021

MEMORANDUM

FROM: Betty Currie

DATE: March 28, 1995

2. Ceandra Scott called - She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the Radio Address. Apparently they were in Maggie's office when request came and Maggie said she didn't know, but to contact DNC ---- I

Rob — Strike deal doing business w/ 2 weeks

Brad - what is our deal w/ Expidite contract? ~~[illegible]~~ the contract finished

March 6, 1995

TO: Bobby
FR: Richard Sullivan
RE: AISI Faxcast

what follow-up has been done needs side meet w/ anybody? dig into charges the expedite

Johny Chung, Torrance, CA, CEO of Automated Intelligent Systems, contributed $94,000 to the DNC in 1994 and raised an additional $20,000. Johnny's company, AISI is a faxcast company with many political clients including Gov. Chiles, Sen. Kennedy and others. Johnny would like to get some of our business. Art Liang, managing director of the company will be in town on Wednesday and Thursday and would like to meet with the appropriate person at the DNC. He has said that he would beat the price of the company we are currently using. Please advise.

File
Admin -
B

DNC 1096986

THE WHITE HOUSE

WASHINGTON

March 24, 1995

MEMORANDUM FOR: MARGARET A. WILLIAMS

FROM: GARY J. WALTERS

SUBJECT: BILLS FOR COLLECTION

The following information is provided concerning unpaid bills for collection issued by the Executive Residence at the White House for fiscal years 1994 & 1995. Fiscal year 1993 bills are paid.

With all previous bills having now been paid, it is very obvious that unpaid bills are attributed to the DNC.

Bill #	Expenses	Event	Action
Fiscal Year 1994 - October 1, 1993 to September 30, 1994			
94-0021	41,291.89	Holiday Events	PARTIALLY PAID DNC*
94-0042	14,534.65	DNC Reception	? DNC
94-0043	47.06	DNC Lunch w/Mrs. Clinton	? DNC
94-0047	4,280.33	U. S. Olympic Comm.	Social Ofc. contact
94-0054	14,063.03	Mother's Day Health Care Event (tent)	Robyn Dickey Mickey Iberra
94-0066	10,568.52	African American Constituents	? DNC
94-0070	38,853.88	Business Leaders Forum	? DNC
94-0072	11,131.96	California Day	? DNC
94-0073	18,917.29	DNC Dinner	? DNC

Remaining to be paid by the DNC - FY 94 $135,345.25

DNC 3078128

Current Fiscal Year 1995 - October 1, 1994 to date

95-0008	8,931.64	Michigan Day	DNC Attn: Joan Kenny
95-0010	10,075.57	Tennessee Day	DNC Attn: Tony Lewis
95-0011	19,622.27	DNC Dinner	DNC Attn: Bob Watson
95-0015A	3,857.72	Political Supporters	DLC
95-0015C	3,857.72	Political Supporters	DNC Attn: Bob Watson
95-0017	4,805.80	Michigan Day	Bill not submitted - No Address (DNC ?)
95-0019	10,941.03	New Jersey Day	Bill not submitted - No Address (DNC ?)
95-0026	15,174.58	** DNC Group	DNC Attn: Bob Watson
95-0027	19,054.62	** Arkansas Group	DNC Attn: Bob Watson
95-0028	16,321.19	** Political Reception	DNC Attn: Bob Watson
95-0029	18,466.94	** DNC Group	DNC Attn: Bob Watson
95-0031	13,639.71	** Holiday Reception (Various Groups)	Bill not submitted - No Address (DNC ?)
95-0032	17,975.82	** Holiday Reception (Press Corps)	Bill not submitted - No Address (DNC ?)
95-0033	24,122.62	** Holiday Reception (Press Corps)	Bill not submitted - No Address (DNC ?)
95-0034	23,681.94	** Holiday Reception (Various Groups)	Bill not submitted - No Address (DNC ?)
95-0[illegible]	[illegible]	** Holiday Dinner (Yale Dinner)	Bill not submitted - No Address (DNC ?)
95-0036	19,503.20	** Holiday Reception (Arkansas Group)	Bill not submitted - No Address (DNC ?)
95-0037	37,454.99	** Holiday Reception (White House Staff)	Bill not submitted- No Address (DNC ?)
95-0038	12,458.16	** Holiday Reception (Residence Staff)	Bill not submitted - No Address (DNC ?)

95-0041	2,509.27	Breakfast Democratic Congresswomen	Bill not submitted - No Address (DNC ?)
95-0042	280.34	Meeting w/Democratic Congressmen	DNC Attn: Bob Watson
95-0046	492.54	Luncheon w/Democratic Congressmen	DNC Attn: Bob Watson
95-0049	14,984.69	DNC - Texas Group	DNC Attn: Bob Watson
95-0050	15,400.07	DNC Trustees	DNC Attn: Bob Watson
95-0051	13,436.56	DNC Trustees	DNC Attn: Bob Watson

Total amount of Bills for Collection unpaid for Fiscal Year 1995 that are listed above as being attributed to or having already been submitted to the DNC $341,857.40

* Partial payment of $198,714.56 made on 3/15/95.
Left unpaid are holiday receptions for the following:

12/14/93	Press receptions I & II	$16,875.28
12/15/93	Press receptions III & IV	16,199.47
12/22/93	Residence Staff reception	8,217.14
	Total unpaid from bill 94-0021	$41,291.89

** Bills for Collection 0026 through 0038 are holiday bills historically paid by the national political committees as they are for holiday receptions; decision has not been made as to billing address, if any.

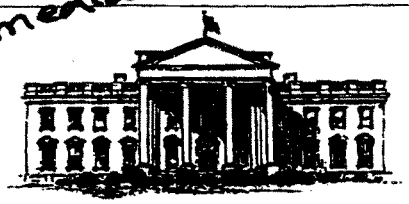
EXPENSE ACCOUNTS

REIMBURSABLE EVENTS

3948-1106-642	Executive Residence Staff Overtime Pay - staff regular pay is not charged against the event
3948-2401-642	Calligraphy (invitations, programs, etc.)
3948-2506-642	Other Charges (tents, paper goods, entertainers expenses, equipment rental, etc.)
3948-2508-642	Extra Labor (kitchen staff, butlers, cleaning staff, florists, etc.)
3948-2608-642	Florists Supplies and Flowers.
3948-2621-642	Staff Food and Beverage - when staff is required over a meal period the meals served to extra staff are part of the event costs
3948-2622-642	Food and Beverage
3948-2630-642	National Park Service Expenses

DNC 3078131

Immediate Attention



THE WHITE HOUSE
Office of Management and Administration
(202) 456-2861
Fax: (202) 456-1655

FAX TRANSMISSION SHEET

DATE: 9 / 5 /1995

TO: Joe Sandler Eyes only

OFFICE: _____ FAX: 863-8081

OFFICE: _____

FROM: Sadie Torkelson PHONE: 456-2861

SUBJECT: _____

COMMENTS: _____

NUMBER OF PAGES (INCLUDING THIS COVER SHEET): 37

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DNC 3080883

THE WHITE HOUSE
WASHINGTON

Joe Sandler
863-8081

AUGUST 1, 1995

MEMORANDUM FOR: MARGARET A. WILLIAMS
ASSISTANT TO THE PRESIDENT AND
CHIEF OF STAFF TO THE FIRST LADY

JODIE TORKELSON
DEPUTY ASSISTANT TO THE PRESIDENT
FOR MANAGEMENT AND ADMINISTRATION

FROM: GARY J. WALTERS Gary J Walters

SUBJECT: BILLS FOR COLLECTION

The following information is provided concerning unpaid bills for collection issued by the Executive Residence at the White House for Fiscal Year 1994 & Fiscal Year 1995 through June 1, 1995.

Date	Bill #	Expenses	Event	Action
		Fiscal Year 1994 - October 1, 1993 to September 30, 1994		
12/93	94-0021	41,291.89	Holiday Events	PARTIALLY PAID • DNC
04/13/94	94-0047	4,280.11	U. S. Olympic Comm.	Social Ofc. contact with Steve Bull
05/06/94	94-0054	14,063.03	Mother's Day Health Care Event (tent)	Robyn Dickey Gary Timmons
		Current Fiscal Year 1995 - October 1, 1994 to date		
11/08/94	95-0015A	3,857.72	Political Supporters	DLC
11/21/94	95-0017	4,805.80	Michigan Day	Presented to DNC
11/29/94	95-0019	10,941.03	New Jersey Day	Presented to DNC
11/17/94	95-0027	19,054.62	Arkansas Group	DNC - Bobby Watson

DNC 3080884

12/07/94	95-0031	13,639.71	** Holiday Reception (Various Groups)	Presented to DNC
12/13/94	95-0032	17,975.82	** Holiday Reception (Press Corps)	Presented to DNC
12/14/94	95-0033	24,122.62	** Holiday Reception (Press Corps)	Presented to DNC
12/15/94	95-0034	23,681.94	** Holiday Reception (Various Groups)	Presented to DNC
12/16/94	95-0035	18,207.13	** Holiday Dinner (Yale Dinner)	Presented to DNC
12/18/94	95-0036	19,503.20	** Holiday Reception (Arkansas Group)	Presented to DNC
12/21/94	95-0037	37,454.99	** Holiday Reception (White House Staff)	Presented to DNC
12/22/94	95-0038	12,458.16	** Holiday Reception (Residence Staff)	Presented to DNC
01/19/95	95-0041	2,509.27	Breakfast Democratic Congresswomen	Presented to DNC
01/12/95	95-0042	280.64	Refreshments Democratic Congressmen	DNC: Bobby Watson
02/08/95	95-0046	492.54	Luncheon Democratic Congress Members	DNC: Bobby Watson
02/13/95	95-0049	14,984.69	Reception (Texas Group)	DNC: Bobby Watson
02/16/95	95-0050	15,400.07	Dinner (DNC Trustees)	DNC: Bobby Watson
02/21/95	95-0051	13,436.56	Dinner (DNC Trustees)	DNC: Bobby Watson
02/17/95	95-0055	11,231.64	Luncheon (Blue Room)	Neil Horstman
03/08/95	95-0061	13,848.15	Reception (Louisiana Day)	Jim Nickel
03/21/95	95-0065	32,667.62	Reception (New York Group)	Brad Marshall
03/09/95	95-0066	769.00	Math & Science Awards	Phyllis Marcucio

04/11/95	95-0069	4,882.36	Tea (Madison Council)	Paul Prosperi
05/04/95	95-0081	13,776.01	Reception (White House Fellows)	Mary Schiavo
05/15/95	95-0084	9,409.98	Reception (Asian Group)	Doris Matsui
05/19/95	95-0085	46,575.17	Reception (Women's Bureau)	Carol Emerling
05/29/95	95-0088	19,134.45	Memorial Day Event	Hershel Grover
05/30/95	95-0089	3,845.80	Luncheon (DNC Group)	DNC: Bobby Watson
05/24/95	95-0091	3,184.99	Luncheon (Thailand)	State Dept.
05/18/95	95-0092	2,954.15	Luncheon (Zimbabwe)	State Dept.

* Partial payment of $198,714.56 made on 3/15/95.
Left unpaid are holiday receptions for the following:

12/14/93 Press receptions I & II	$16,875.28
12/15/93 Press receptions III & IV	16,199.47
12/22/93 Residence Staff reception	8,217.14
Total unpaid from bill 94-0021	$41,291.89

** Bills for Collection 0031 through 0038 are holiday bills historically paid by the national political committees as they are for holiday receptions; decision has not been made as to billing address although they have been presented to the DNC

SEARCH: FEBRUARY 1994

APPT. DATE	LNAME	FNAME	REQUESTED BY		VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
940202	CHUNG	JOHNY	U73548	BOTWIN	FOUCART	L	13:18	00201	13:27	

EXHIBIT
MW-13

COMMITTEE ACCESS

EOP 008708

APPT. DATE	LNAME	FNAME	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
940722	CHUNG	JOHNNY	U49607 ANDERSON	ANDERSON	119	14:26	DD201	0:00	
940721	HUANG	JOHN	U47960 CARTER	POTUS	450	18:17	DD102	0:00	

COMMITTEE ACCESS EOP 008700

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
940802	CHUNG	JOHNNY	U53397	LEWIS	LEWIS	474	7:35	H0101	8:46	
940804	CHUNG	JOHNNY	U55276	ANDERSON	ANDERSON	118	11:45	H0201	13:07	
940805	CHUNG	JOHNNY	U55663	DICKEY	POTUS	S. LAWN	8:39	A0101	10:32	
940808	CHUNG	JOHN	U56778	ATTA	LEWIS	115	16:06	00201	19:49	
940811	CHUNG	JOHNNY	U58540	ANDERSON	ANDERSON	110	15:54	00201	0:00	
940812	CHUNG	JOHNNY	U59123	ANDERSON	LEWIS	115	17:56	00201	0:00	
940802	HUANG	JOHN	U53397	LEWIS	LEWIS	474	7:35	00101	8:46	

COMMITTEE ACCESS

12/27/96 08:43:08 AM

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POS	TOU
940920	CHUNG	JOHNNY		U72297	LEWIS	LEWIS	116	14:07	002	0
940921	CHUNG	JOHNNY		U72388	KELLY	QUINN	276	15:23	001	15
940923	CHUNG	JOHNNY		U74202	LEWIS	LEWIS	119	17:33	002	0
940926	HUANG	JOHN		U74799	WILSON	KRISTOFF	230	17:42	004	0
940927	HUANG	JOHN		U78119	WEAVER	WEAVER	131	11:02	001	0

COMMITTEE ACCESS

EOP 003738

402

SEARCH: OCTOBER 1994

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
941005	CHUNG	JOHN	U78587	SHAKOW	SHAKOW	110	10:48	00201	0:00	
941020	CHUNG	JOHNNY	U87935	ANDERSON	ANDERSON	110	10:24	00202	13:05	
941005	HUANG	JOHN	U78362	MIDDLETON	MIDDLETON	W	8:16	A0402	12:14	
941014	HUANG	JOHN	U82068	BURGET	BURGET	10103	10:04	K0102	11:19	

COMMITTEE ACCESS

RUN DATE 94/12/01 VISITOR SUMMAR 9 94/11

VISIT		VISITEE		JOB	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TOA	POA
CHUNG	JOHNNY	EDER		U89217	1300	941101	O	122	EDER	A	000323	1447	002
				9313	0700	941102	O	87				0712	002
CHUNG	JOHNNY	MITCHELL		U98568	1145	941129	O	487	WOZNIAK	N	007958	1130	02

COMMITTEE ACCESS

REDACTED

EOP 005041

RUN DAT / / VISITOR SUMMARY 94/12

VISITOR		VISITEE		TIME	DATE	LOC	ROOM	REQUESTOR		
CHUNG	JOHNNY	LEWIS	U07470	1200	941217	U	113	DUNN		
CHUNG	JOHNNY	ANDERSON	U07496	1300	941219	O	113	ANDERSON	K	
CHUNG	[illegible]	SWIFFIELD	U07852	2000	[illegible]	O	[illegible]	SWIFFIELD	A	
CHUNG	JOHNNY	DUNN	[illegible]	1310	941227	U	113	DUNN		
CHUNG	JONATHON	BROWN	U08494	0900	[illegible]	U	376	BROWN		
CHUNG	JOHNNY	POTUS	U08186	1930	941220	W	RESIDENCE	BURKE		0000 VIS
		POTUS	U04997	2000						

COMMITTEE ACCESS

REDACTED

EOP 005040

COPY
from ORM

6389

9/27/95
Date

10/4/95
To

Duplicate
200 Carbonless Sets
5½" x 4 2 Per Page

TEL ONE
MESSAGE
FORMS

23-023 Corporation
Ohio 45463

EXHIBIT

EOP 059073

To Evan

Date 9/29/95 Time 1:40

WHILE YOU WERE OUT

M Johnny Chang

of

Phone 1-800-997-1736

Area Code Number Extension

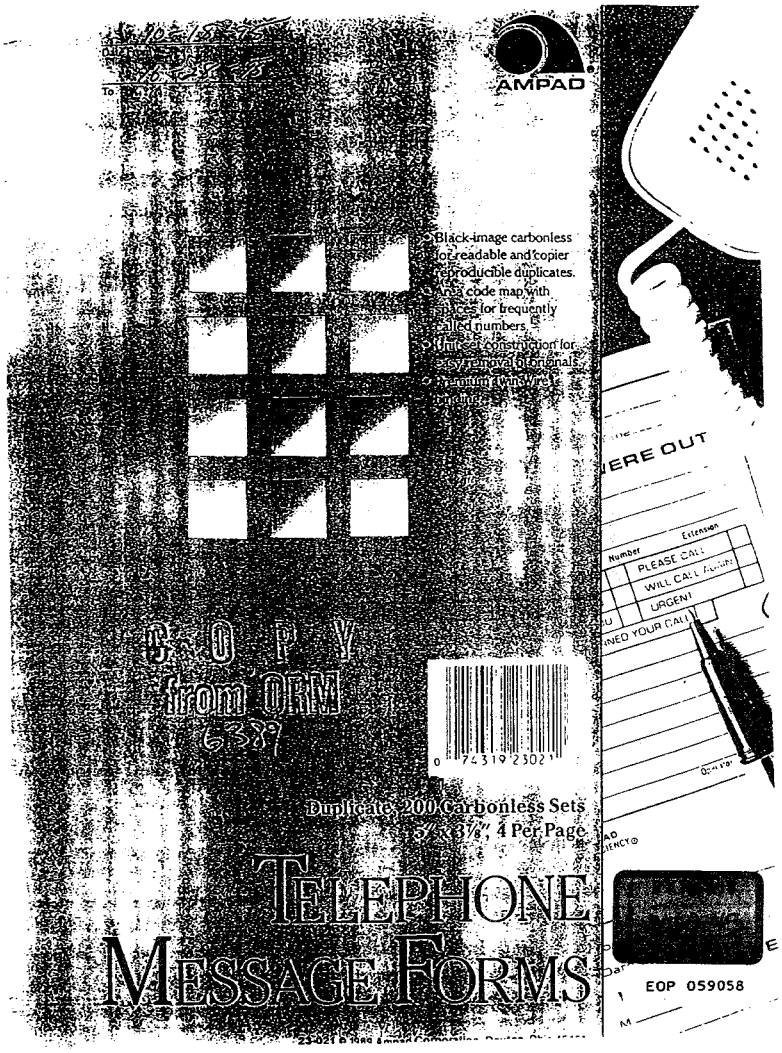
TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message He is sending
2 Bottles of
Cheers —
1 — for Maggie
1 — for you & Nick

EB

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS


AMPAD
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TELEPHONE
MESSAGE FORMS
ERE OUT
Number
Extension
PLEASE CALL
WILL CALL AGAIN
URGENT
NED YOUR CALL
EOP 059058

To Evan

Date 10/20/95 Time 12:30

WHILE YOU WERE OUT

M Johnny Chung

of 202-342-5865

Phone

Area Code	Number	Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

Landon phones to

Zuret Maggie.

EB

Operator

AMPAD EFFICIENCY. 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

EOP 059059

Energy lawyers that, "while she could serve as honorary chair of that year's Africare dinner, it would be 'unethical for O'Leary to personally solicit funds from people doing business with the department.' Bloom: "Which is why Johnny Chung's claim is so troubling: that for a $25,000 table, he could buy five Chinese oil men a half-hour meeting with the Secretary of Energy." Center for Public Integrity's Charles Lewis: "This is the first information we have of a deliberate shakedown by Clinton administration officials 'You give us this cash, we'll give you this result.' This directly implicates a member of the president's Cabinet in a cash-for-favors scheme." Bloom: "The Energy Department denied that O'Leary's aide solicited any money from Chung and White House Special Counsel Lanny Davis told NBC News, 'Since we're not in a position to know whether Mr. Chung's statement is accurate or not, we're in no position to comment.' We tried in vain by phone and by fax yesterday and today" to contact O'Leary "but she had nothing to say" (8/19). To read more of Bloom's take, click here.

LEVEL 1 - 7 OF 57 STORIES

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NBC News Transcripts

SHOW: NBC NIGHTLY NEWS (6:30 PM ET)

August 19, 1997, Tuesday 10:31 AM
LENGTH: 822 words

HEADLINE: JOHNNY CHUNG, HEAVY DEMOCRATIC CONTRIBUTOR, DISCUSSES HOW HIS CONTRIBUTIONS WERE ALLEGEDLY INFLUENTIAL IN VISITING THE WHITE HOUSE BODY: TOM BROKAW, anchor (Los Angeles):

NBC NEWS IN DEPTH tonight, an NBC News investigation. The first television interview with a man who may know his way around the White House better than many of the people who work there, and his only pass was a checkbook. He is Johnny Chung, a gregarious California businessman, a central figure in the uproar over campaign finance abuses. Tonight we learn even more about the first lady's role, a cabinet secretary with a favorite charity, and about the going price for getting right next to big power.

Here's Vice President Al Gore, and the president of the United States, and Johnny Chung right in the middle, between the two most powerful men in this country, and checkbooks got him there.

Mr. JOHNNY CHUNG: At the real time I enjoyed it, and again. I think I participated, this American in-- American political process.

BROKAW: Participated in a big way, contributing $ 400,000 for fundraisers like presidential birthday parties, responding to almost weekly requests for money from the Democratic National Committee, and it paid off. It opened White House doors for Chinese and Taiwanese businessmen who came to Chung for help. In turn, they invested hundreds of thousands of dollars in his businesses.

And did people in the corridors know who you were? You would have friends that would recognize you when you were there?

Mr. CHUNG: They treat me very nice, very friendly, and treated me like a VIP.

BROKAW: Not bad for the part-owner of a 10-person fax and information business. But he had quickly learned it helps to have connections in high places. Johnny Chung went right to the top. Money was the price of admission, and in 50 visits he popped up just about everywhere in the White House. As a result, he became one of the posterboys of the campaign finance scandal. Largely because Johnny Chung was practically a cash machine for the Democrats, and because his access to the White House was almost unlimited. But those asking Chung for money went beyond the White House, and according to Chung went beyond political contributions.

You had some other Chinese friends come who were in the petrochemical business.

Mr. CHUNG: Yes, sir.

BROKAW: You wanted to see Hazel O'Leary, who was then the energy secretary.

Mr. CHUNG: Yes, sir.

BROKAW: You had a chance encounter with a lobbyist, who--someone who was working with Ms. O'Leary.

Mr. CHUNG: Yes, sir.

BROKAW: And they knew that she had a favorite charity. It's AfriCares, is that the name of it?

Mr. CHUNG: Yes, sir.

BROKAW: So what did they suggest to you?

Mr. CHUNG: They can set it up, a meeting, for us. It would be nice if you make a donation to AfriCares.'

BROKAW: Were you surprised when someone could get you in to see Hazel O'Leary if you would write a check to her favorite charity?

Mr. CHUNG: I begin to understand a little bit, but I am still a little bit surprised.

BROKAW: Yeah. Who picked up the check?

Mr. CHUNG: There's one gentleman, present himself as the energy department official, and said I'm here to pick it up, the $ 25,000 check.

BROKAW: This is the check?

Mr. CHUNG: This is the check.

BROKAW: To AfriCare?

Mr. CHUNG: To AfriCare.

BROKAW: A charity that the energy secretary supports, she sends over somebody from the energy department to pick it up, and you get a meeting with her with a very prominent Chinese petrochemical official.

Mr. CHUNG: Yes.

BROKAW: That meeting with the energy secretary wasn't the first time Chung had gotten his Asian business associates into the corridors of power. In March, 1995, this meeting with Hillary Clinton was arranged, he says, with a check he delivered directly to her office.

You decided on $ 50,000 because you had five visitors that you wanted to bring in?

Mr. CHUNG: You can say that, Tom.

BROKAW: Basically, Chung says $ 10,000 a head. But who suggested the donation? That's a critical point, because it's against the law for federal employees to solicite donations. Chung insists Mrs. Clinton's aides, Evan Ryan and Maggie Williams, raised the idea of a donation to defray the cost of a White House Christmas party.

You knew what that meant, that you were going to write a check?

Mr. CHUNG: Tom, I'm still a new kid in town over there, but at that time, I see my lightbulb goes on, and I begin to understand, and I said, I'd be very happy to help. May I offer $ 50,000.'

BROKAW: Did Mrs. Clinton know about this arrangement?

Mr. CHUNG: I asked Ms. Ryan, Did Mrs. Clinton know I put a lovely contribution of $ 50,000?' She said she definitely know.

BROKAW: And then you got to meet Mrs. Clinton with your friends.

Mr. CHUNG: The first word she says, Welcome to the White House, my friend.'

BROKAW: That meeting also got Chung and his friends into the Oval Office for a presidential radio address and into the White House mess for lunch. Today Chung says he and his family still respect the first family, but if he had to do it over again, he would consult a member of the Republican Party.

Mr. CHUNG: Tom, you know that I got a Republican, conservative wife.

BROKAW: That's hard to believe.

Mr. CHUNG: Yes. And she's very conservative, and if I ever got a chance go over again I will talk to my Republican wife first.

BROKAW: It's important to remember that Chung has not been officially charged with any wrongdoing. He is very candid about why he got involved in politics. It was good for business,' he said. And he has this memorable phrase, The White House,' according to Johnny Chung, is like a segue,' in his words, you put in coins to open the gates.'

LEVEL 1 - 8 OF 57 STORIES

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NBC News Transcripts

SHOW: DATELINE NBC (10:00 PM ET)

August 19, 1997, Tuesday 10:31 AM
LENGTH: 1717 words

LEVEL 1 - 2 OF 2 STORIES

Copyright 1997 Times Mirror Company
Los Angeles Times

August 9, 1997, Saturday, Home Edition

SECTION: Part A; Page 1; National Desk

LENGTH: 2081 words

HEADLINE: DONOR SPEAKS OUT ON CLINTON GROUP;
FUND-RAISING: PRIVATE COMMITTEE DID FAVORS, HAD WHITE HOUSE TIES, CHUNG'S LAWYER SAYS.

BYLINE: WILLIAM C. REMPEL and ALAN C. MILLER, TIMES STAFF WRITERS

BODY:

Prominent Democratic campaign donor Johnny Chien Chuen Chung contributed $ 25,000 last year to a private committee that publicly defended the president and Hillary Rodham Clinton against Whitewater-related ethics attacks after the first lady's chief of staff referred the head of the committee to Chung, Chung's attorney said this week.

Lynn Cutler, chairwoman and co-founder of the Back to Business Committee, solicited Chung's donation and later arranged a private meeting for the Southern California entrepreneur with Ambassador James R. Sasser in China, according to Chung's attorney and documents obtained by The Times. Cutler also arranged a meeting for Chung with a Commerce Department official in Washington.

By Chung's account, provided through Santa Monica attorney Brian Sun, the businessman was approached after attending a White House Christmas party in December 1995. Chung quoted Cutler as saying that she contacted him at the suggestion of Margaret Williams, then the first lady's chief of staff, because she said he was a friend of the first lady who may be willing to help.

"Maggie was the magic word. My client didn't know Lynn Cutler, had never heard of her, but agreed to meet with her because she was referred by Maggie Williams," said Sun in his first public comments about the episode.

Chung's account of the White House referral and subsequent governmental favors for him raise questions about the Back to Business group's relationship with the Clinton administration and could renew pressure on the now-defunct organization to release the names of its other contributors. Back to Business, which arranged for a network of volunteer speakers to counter Clinton critics and disseminate pro-Clinton information through the media, was active between 1994 and the summer of 1996.

The Chung story also is likely to fan controversy surrounding Williams. Less than a year before the referral, Williams accepted a $ 50,000 campaign donation check from Chung in the White House, which he said the aide solicited. Williams denied any role in seeking the $ 50,000 from Chung, who had frequently offered to assist the Clintons.

Williams attorney Edward S.G. Dennis Jr. referred to the White House all questions regarding any role that Williams may have played in bringing Chung and Cutler together.

Special White House Counsel Lanny J. Davis said that "when Ms. Williams was asked by others how they could be supportive of the first lady, she might have included the committee as one of several entities that were supportive of the president and the first lady."

However, he said, "Ms. Williams did not solicit on behalf of the committee."

White House officials confirmed that Cutler arranged a meeting for Chung with a Commerce Department official but declined to comment on any role Cutler may have played in facilitating Chung's session in Beijing with Sasser.

A State Department official said U.S. embassies do not keep records of private citizens' visits and that any meeting between Chung and the ambassador would be a private matter.

Davis said White House involvement with Back to Business, which he said included "frequent contact," was absolutely appropriate because "it supported the goals of this administration and worked to ensure that the public receive accurate information about issues concerning the president and first lady."

Davis, then a private Washington attorney, was one of the volunteers Back to Business helped place on television shows as an advocate for the Clintons.

Cutler and her Back to Business partner, Ann Lewis, who are now White House aides, could not be reached Friday.

But a source close to Cutler said that "she learned of Mr. Chung and his potential interest in helping from a number of different places as a result of her involvement with the Democratic Party."

Cutler was vice chairwoman of the Democratic National Committee from 1981 through 1992 and currently is deputy White House director of intergovernmental affairs. Lewis, also a longtime party activist, served as deputy manager of the Clinton-Gore campaign in 1996 and is now White House communications director.

Congressional investigators have sought to question Chung, who is a focus of Justice Department and Senate investigations into possible campaign law violations. Chung is unwilling to testify before a Senate committee probing the fund-raising controversy without a grant of immunity from prosecution. There have been preliminary discussions with both Justice Department and Senate investigators regarding possible immunity.

"If the purpose of these hearings is to get to the truth and find what needs to be done to reform campaign finance practices, then the Senate ought to issue immunity to Johnny Chung and get him in front of the country," Sun said. "The problem, of course, is politics. He exposes as baseless the 'foreign conduit' claims of the Republicans, but he also embarrasses the Democrats."

Chung's story provides the first glimpse inside fund-raising efforts of the little-known Back to Business Committee, one of several private groups established to finance a range of personal and political causes associated

with the Clintons. Many have refused to divulge donor lists on grounds they are private and not subject to public disclosure rules.

Ellen Miller, executive director of Public Campaign, a nonpartisan group advocating campaign finance reform, is troubled by the proliferation of such groups and supports full disclosure.

"Beneath the campaign finance system is a series of subterranean passageways and rooms into which interested supporters can help out the president and first lady," Miller said. "It operates well beneath the public radar screen, but there is the potential for unlimited private money designed to buy access and influence.

"There are no guidelines, there are no rules, there is no disclosure. This is a no-holds-barred fund-raising opportunity," she said.

Back to Business operated with a budget of $ 15,000 to $ 20,000 a month for office support staff, mail and other costs, according to news accounts. One story in April 1996 reported that the committee had been financed with less than $ 100,000 over two years.

One former associate said Cutler, who at the time worked for a prominent public relations firm where Back to Business was headquartered, was invariably "fretting about keeping the group afloat."

While the White House provided Back to Business with the names of individuals, at least some officials thought that the administration should avoid helping to raise money for the private committee.

"We stayed a million miles away from it," said one former White House official familiar with Back to Business. "We wanted to maintain their independence and ours."

According to the documents reviewed by The Times and interviews with Chung's attorney and others, this is the story behind Chung's $ 25,000 donation to the Back to the Business Committee:

Chung was in Washington on Dec. 8, 1995, to attend a White House Christmas party as a guest of the DNC, to which he was a major donor.

(Records show he visited the White House 49 times and gave the DNC $ 366,000 between 1994 and 1996, all of which was returned this year because the party said an internal audit could not confirm that the funds actually came from Chung).

Chung brought along a guest of his own, a Chinese artist friend living in Vancouver, Canada, whom Chung photographed with President Clinton.

The next morning Chung received a phone call at his Washington apartment from Cutler who, by his account, introduced herself as a friend of the first lady who was referred to him by Williams. Based on the Williams referral, he agreed to

meet Cutler a day later.

That wintry Sunday morning, Cutler joined Chung at the J.W. Marriott Hotel near the White House. She arrived in casual clothes, carrying a manila folder stuffed with newspaper clippings under her arm. The meeting lasted about two hours.

Seated at a window table in the closed and otherwise deserted hotel bar, Cutler spread out copies of stories about Whitewater and the ongoing Senate hearings into the controversy chaired by Alfonse M. D'Amato (R-N.Y.). She said the Back to Business Committee had been set up to defend the first lady and the president, that the group planned to attack D'Amato through the media, and that Chung's financial help was needed.

During the conversation, according to the account, Cutler asked for $ 20,000. She also talked about her friendships with various government leaders. Chung asked if she knew the new ambassador to China, the former Tennessee senator Sasser.

"I know him very well," she reportedly said and offered to introduce them someday.

Chung, a Taiwan-born American citizen with various business interests in China and an international fax service in Torrance, knew virtually nothing about the Whitewater matter. Nonetheless, he agreed to contribute $ 25,000.

Cutler told Chung to call if he ever needed anything in Washington.

But Chung hesitated writing the check. He wanted to know more about Cutler. According to the account, Chung turned to DNC Finance Director Richard Sullivan and the first lady's office. Everywhere he was assured she was "a friend."

Back in Los Angeles, where Cutler reportedly called him several times to inquire about when the check would be sent, Chung saw her appear on the CNN program "Crossfire," identified as a Democratic consultant and former vice chairwoman of the DNC.

On Feb. 2, 1996, Chung wrote a $ 25,000 check on one of his personal bank accounts to "Beck Business Committee" and sent it to Washington. The fractured title was no obstacle; the sum was deposited into a Riggs National Bank branch at 20th and L Streets three days later.

A month later, Chung called in his first favor, according to his account.

In March 1996, business dealings with the Haoman beer-makers in Beijing brought Chung to China. He called on the U.S. Embassy to request an appointment with Ambassador Sasser. He was politely told that the ambassador's schedule was too crowded.

Chung faxed a letter to Washington, asking Cutler if she could help, then left Beijing for three days to travel in southern China. During his absence, Cutler faxed a letter to Sasser and the ambassador apparently put his staff to work immediately trying to locate Chung to arrange that appointment.

When Chung returned to his Beijing hotel suite, he found copies of the Cutler and Sasser faxes on the floor, slipped under his door.

The Cutler note to the ambassador identified Chung as an American businessman, a friend and a supporter of the DNC.

Sasser's March 8 response said: "Dear Lynn, Mr. John Chung did come to the Embassy and left a portfolio with my secretary. . . . We have called several of the major hotels in Beijing but have not located him. . . . Please have him call us so an appointment can be arranged."

The next morning Chung and Sasser met for about 30 minutes, discussed the state of Sino-Taiwan relations, posed for a picture together and, in Chung's view, developed a relationship. It was, by his account, nothing more than a social call, but it was significant.

To a businessman in China, access to the U.S. ambassador in Beijing was very important. It "put powder on my face," he would tell his attorneys; that is, it made Chung look good to his Chinese business associates.

Within a month Chung turned to Cutler for another favor. He faced a business decision about a possible opportunity in the oil-refining business and wanted the advice of a Commerce Department official. Cutler arranged the meeting. It lasted 20 minutes and left Chung persuaded to steer clear of this unfamiliar terrain.

"There was nothing sinister about these meetings," attorney Sun said. "Others can speculate about whether these donations influenced Cutler's willingness to assist Johnny."

Chung did make additional efforts to seek Cutler's help. But she did not return his subsequent calls.

Rempel reported from Los Angeles, Miller from Washington. Times researcher Janet Lundblad contributed to this story.

(BEGIN TEXT OF INFOBOX / INFOGRAPHIC)

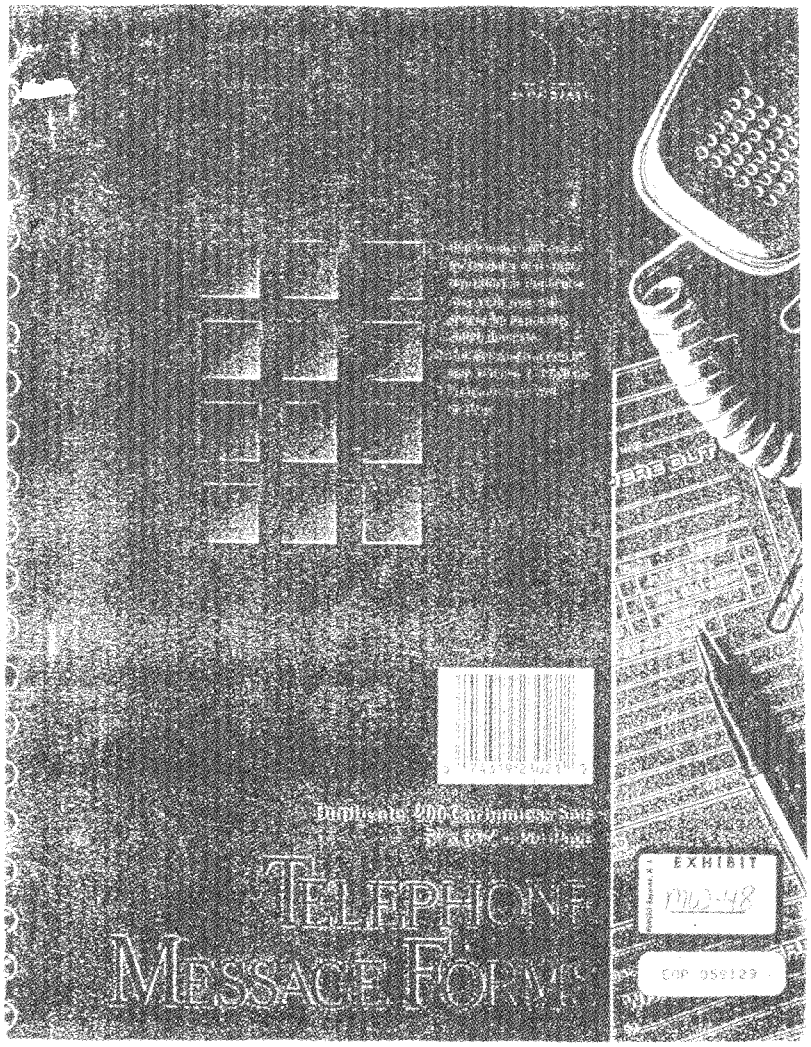
The $ 25,000 Check

Johnny Chien Chuen Chung, through his attorney, says a former Democratic National Committee vice chairwoman solicited this $ 25,000 contribution for a pro-Clinton support group after he attended a White House Christmas party (invitation below).

GRAPHIC: PHOTO: Johnny Chung GRAPHIC-CHART: The $25,000 Check / Los Angeles Times

LANGUAGE: English

LOAD-DATE: August 9, 1997


TELEPHONE
MESSAGE FORM
EXHIBIT
DOP 058129

To Chan

Date 12/8/95 Time 10:55

WHILE YOU WERE OUT

M Johnny C Chung

of

Phone 202-342-5805

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Wants Clearance ve
1:00 —
Johnny C Chung 6/9/54
Sammas CUT - 11/5/43
On his way Operator DWC

AMPAD EFFICIENCY® 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

Wants to talk to you,

EOP 059130

[The deposition of Evan Ryan follows:]

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
U.S. HOUSE OF REPRESENTATIVES,
Washington, DC.

DEPOSITION OF: EVAN RYAN

WEDNESDAY, AUGUST 20, 1997

The deposition in the above matter was held in Room 2203, Rayburn House Office Building, commencing at 2:45 p.m.

Appearances:

Staff Present for the Government Reform and Oversight Committee: Jennifer Safavian, Investigative Counsel; Edward Eynon, Investigative Counsel; David Bossie, Oversight Coordinator; Barbara Comstock, Chief Investigative Counsel; James C. Wilson, Senior Investigative Counsel; Kenneth Ballen, Minority Chief Investigative Counsel; Andrew J. McLaughlin, Minority Counsel; Kristin Amerling, Minority Counsel.

For EVAN RYAN:

BILL LAWLER, ESQ.
Vinson & Elkins
1455 Pennsylvania Avenue, N.W.
Washington, D.C., 20004

THEREUPON, EVAN MAUREEN RYAN, a witness, was called for examination by counsel, and after having been first duly sworn, was examined and testified as follows:

Ms. SAFAVIAN. Good afternoon, Ms. Ryan. On behalf of the members of the Committee on Government Reform and Oversight, I appreciate and thank you for appearing here today.

This proceeding is known as a deposition. The person transcribing this proceeding is a House reporter, and although he is not a notary public, you were just sworn in by a notary public and were placed under oath.

I would like to note for the record those who are present at the beginning of this deposition. I am Jennifer Safavian, the designated Majority counsel for the committee. I am accompanied today by Edward Eynon, who is with the Majority staff. Andrew McLaughlin is the designated Minority counsel for the committee, and Mr. McLaughlin is accompanied by Ken Ballen, who is also with the Minority staff. And the deponent is represented by Bill Lawler.

Although this proceeding is being held in a somewhat informal atmosphere, because you've been placed under oath, your testimony here today has the same force and effect as if you were testifying before the committee or in a courtroom. If I ask you about conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and then you may give me the gist or the substance of any such conversation to the best of your recollection. If you recall only part of a conversation or only part of an event, please give me your best recollection of those events or parts of conversation that you recall. If I ask you whether you have any information upon a particular subject and you have overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you do have such information and indicate the source, either a conversation or documentation or otherwise from which you've derived such knowledge.

Before we begin the questioning, I want to give you some background about the investigation and your appearance here. Pursuant to its authority under House Rules X and XI of the House of Representatives, the committee is engaged in a wide-ranging review of possible political fund-raising improprieties and possible violations of the law.

Pages 2 through 4 of House Report 105–139 summarizes the investigation as of June 19, 1997, and encompasses any new matters which arise directly or indirectly in the course of the investigation. Also, pages 4 through 11 of the report explain the background of the investigation. All questions related either directly or indirectly to these issues, or questions which have a tendency to make the existence of

any pertinent fact more or less probable than it would be without the evidence, are proper.

The committee has been granted specific authorization to conduct this deposition pursuant to House Resolution 167, which passed the full House on June 20, 1997. Committee rule 20, of which you have received a copy, outlines the ground rules for the deposition.

Majority and Minority committee counsels will ask you questions regarding the subject matter of the investigation. Minority counsel will ask questions after Majority counsel has finished. After the Minority counsel has completed questioning you, a new round of questioning may begin. Members of Congress who wish to ask questions will be afforded an immediate opportunity to ask questions. When they are finished, committee counsel will resume questioning.

Pursuant to the committee's rules, you are allowed to have an attorney present to advise you of your rights. Any objection raised during the course of the deposition shall be stated for the record. If the witness is instructed not to answer a question or otherwise refuses to answer a question, Majority and Minority counsel will confer to determine whether the objection is proper. If Majority and Minority counsels agree that a question is proper, the witness will be asked to answer the question. If an objection is not withdrawn, the chairman or a member designated by the chairman may decide whether the objection is proper.

This deposition is considered as taken in executive session of the committee, which means it may not be made public without the consent of the committee. Pursuant to clause 2(k)(7) of House rule 11. You are asked to abide by the rules of the House and not discuss with anyone other than your attorney this deposition and the issues and questions raised during this proceeding.

Finally, no later than 5 days after your testimony is transcribed and you have been notified that your transcript is available, you may submit suggested changes to the chairman. The transcript will be made available for your review at the committee office.

Committee staff may make any typographical and technical changes requested by you. Substantive changes, modifications, clarifications, or amendments to the deposition transcript submitted by you must be accompanied by a letter requesting the changes and a statement of your reasons for each proposed change. A letter requesting any substantive changes, modifications, clarifications, or amendments must be signed by you. Any substantive changes, modifications, clarifications, or amendments shall be included as an appendix to the transcript, conditioned upon your signing of the transcript.

Do you understand everything we've gone over so far.

The WITNESS. Yes.

Ms. SAFAVIAN. Do you have any questions about anything we've gone over so far?

The WITNESS. No.

Ms. SAFAVIAN. I will be asking you questions concerning the subject matter of this investigation. Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. If you don't understand a question, please say so and I will repeat it or rephrase it so that you understand the question. Do you understand that you should tell me if you do not understand one of my questions?

The WITNESS. Yes.

Ms. SAFAVIAN. The reporter will be taking down everything we say and will make a written record of the deposition. You must give verbal, audible answers because the reporter cannot record a nod of the head or other gestures. Do you understand that you cannot answer uh-huh or uh-uh?

The WITNESS. Yes.

Mr. LAWLER. She'll even try to abide by that.

Ms. SAFAVIAN. I will, too. How is that?

If you cannot hear me, please say so and I will repeat the question or have the court reporter read the question to you. Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. Please wait until I finish each question before answering and I will wait until you finish your answer before I ask the next question. Do you understand that this will help the reporter make a clear record because he cannot take down what we are both saying at the same time?

The WITNESS. Yes.

Ms. SAFAVIAN. Your testimony is being taken under oath as if we were in court. If you answer a question, it will be assumed that you understood the question and the answer was intended to be responsive to it. Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. Are you here voluntarily or are you here as a result of a subpoena?

The WITNESS. Voluntarily.

Ms. SAFAVIAN. Do you have any questions about the deposition before we begin the substantive portion of the proceeding?

The WITNESS. No.

Mr. MCLAUGHLIN. I have two notes for the record. First, it has been the practice that deposition transcripts are available for your review by mail upon agreement of the Minority and Majority counsel.

Mr. LAWLER. That's fine.

Mr. MCLAUGHLIN. The second thing, that pursuant to House rule 11 2(k)(8) objections, as to pertinency and relevance, are ruled upon by the committee. Accordingly, objections that are ruled upon by the chair are appealable to the full committee.

Mr. LAWLER. Okay.

Mr. MCLAUGHLIN. That's all I have.

EXAMINATION BY MS. SAFAVIAN

Question. Ms. Ryan, can you please state your full name and spell it for the record?

Answer. Evan Maureen Ryan, E-V-A-N, M-A-U-R-E-E-N, and Ryan is R-Y-A-N.

Question. Have you ever used or been known by any other names?

Answer. No.

Question. What is your date of birth and social security number?

Answer. [Redacted].

Mr. MCLAUGHLIN. I'm going to object to the social security number. That's not relevant to the investigation.

EXAMINATION BY MS. SAFAVIAN:

Question. Please continue. Your social security number?

Mr. LAWLER. We don't have any objection to that.

The WITNESS. [Redacted].

EXAMINATION BY MS. SAFAVIAN:

Question. And what is your current address?

Answer. [Redacted].

Question. How long have you lived there?

Answer. Since the end of May of '97.

Question. Where did you live prior to that?

Answer. [Redacted].

Question. Have you ever lived outside the United States?

Answer. I studied in London for a semester during college.

Question. And when was that?

Answer. That was the spring of '92.

Question. And so as you just mentioned, you did attend college.

Answer. Yes.

Question. Where did you attend?

Answer. Boston College.

Question. And when did you graduate?

Answer. May of '93.

Question. Can you tell me what your degree was in?

Answer. Political science.

Question. Did you receive any other degrees or go on to any graduate school?

Answer. No, I haven't.

Question. Have you spoken with anyone other than your counsel about this deposition today?

Answer. No.

Question. Have you spoken with anyone on the committee about the deposition today?

Answer. No.

Question. Did you review any documents in preparation for this deposition?

Answer. One or two.

Mr. LAWLER. As you know, Ms. Ryan was deposed by the Senate committee 2, 3 weeks ago.

The WITNESS. Yes.

Mr. LAWLER. There were exhibits used during that deposition. We reviewed some of those before we came over today.

Ms. SAFAVIAN. Some of the ones that were used in the Senate deposition?

Mr. LAWLER. Yes. I guess some that we were given that weren't actually used as exhibits as well.

Ms. SAFAVIAN. Can you tell me a little bit more about those exhibits?

Mr. LAWLER. Frankly, we would assert privilege. If it's anything relevant. I mean, she reviewed some exhibits. If you want to ask whether they relate to any particular area or relate to any of your questions, I think that's appropriate.

EXAMINATION BY MS. SAFAVIAN:

Question. Can you tell me, is there any way for you to clarify as to what subject or what area these documents were that you reviewed? Did you review these this morning, today?

Answer. Today.

Question. You reviewed them today?

Answer. Yes.

Mr. LAWLER. Not even all. The only things she reviewed today was a package of telephone messages, sheets from message pads.

EXAMINATION BY MS. SAFAVIAN:

Question. Message slips to you, I assume, or from you?

Answer. Some were to me. Some were to other people in the office.

Question. And that's pretty much it?

Answer. That's it.

Mr. LAWLER. There were other things we used as exhibits in the Senate deposition.

EXAMINATION BY MS. SAFAVIAN:

Question. But that was all that was reviewed for this deposition?

Answer. Yes.

Question. Have you been asked by White House counsel or somebody else to collect documents with regard to the House, Senate, or the Department of Justice subpoenas?

Answer. They issued memorandums from White House Counsel's Office that were document requests, so they were pertaining to these investigations.

Question. These were memorandums that went to——

Answer. All White House staff, yes, all White House staff.

Question. Did everyone get the same memo?

Answer. Yes.

Question. And this was from the counsel for the White House?

Answer. Yes.

Question. Can you tell me what that memo said? I mean not verbatim.

Answer. Yes. I don't know exactly. To look through phone records, calendars, files, any paper with—and then there would be a list of what names were relevant and what names should be searched for.

Question. Can you tell me, when did that memorandum come out or when did you receive it?

Answer. I don't know quite exactly when it came out.

Question. Can you give me an idea? A couple of months?

Answer. Yes, a couple of months ago. Not terribly recently.

Question. Do you remember who drafted the memorandum, who it was from?

Answer. I remember it was White House counsel. I don't remember which member White House counsel signed it.

Question. Was it just from one individual?

Answer. I don't remember. It was probably from Charles Ruff. But I don't remember. I remember White House counsel.

Question. Did the memorandum, was it just asking for all these documents with regard to both, the House, the Senate, and the Department of Justice subpoenas or were there different ones issued for each different subpoena?

Answer. There were separate memos for each subpoena.

Question. So you are aware that there was a distinction between these subpoenas?

Answer. Yes.

Question. So then I assume that each memo, what you were looking for varied with regard to each subpoena?

Answer. I remember in each of these memos, they would say pursuant to the House committee, or pursuant to the Senate committee. That's my only recollection of how I know that they were separate.

Question. Besides getting this memorandum from the White House counsel, was there anybody else that directed you or provided you with any other information in which to collect these documents?

Answer. Anyone else that asked for the documents?

Question. Was there anybody else in your office or anybody else besides White House counsel who asked you to do a search for these documents?

Answer. I'm not quite sure I understand the question. We each received these documents and then we would work with different members of the staff to go through for the search, to actually search the files or to search the calendars. So I'm sure I spoke with different people about the actual searches.

Question. What I was just trying to get at is besides the White House counsel memorandum that you received, did anybody else in the office where you work supervise the collection of these documents and also instructed you how to collect these documents or was it just the memorandum from the counsel?

Answer. I don't really—I am now in a different job than I was 6 months ago. When I worked in the First Lady's office, in the main office area, I worked with the chief of staff in terms of collecting the documents. In the job I'm in now, I'm in the scheduling office; I worked with the director of scheduling in terms of finding the documents and where we should look.

Question. So you have been involved with looking for documents in two different areas?

Answer. Yes.

Question. In two different jobs?

Answer. Yes.

Question. Do you recall if you were asked—well, I guess, tell me, what did they tell you to do? Did they ask you to look through file cabinets, all documents?

Mr. LAWLER. "They" meaning the memos?

EXAMINATION BY MS. SAFAVIAN:

Question. I'm sorry, the memorandum, yes.

Answer. Any paper. They just asked to—any sort of paper that was kept or that is around with any of the names.

Question. Did you also look through computer records?

Answer. Yes.

Question. You were asked to do that, also?

Answer. Yes.

Question. And then can you tell me, was there a process after going through the documents and you found something that you thought was relevant to the White House counsel memorandum, what did you do, what was the process?

Answer. I think I worked directly with White House counsel on that. I think the process was to Xerox the information and put it in a folder, an envelope, and give it to the White House counsel member who was assigned. The White House counsel usually assigned a White House counsel staff person who followed up with you to make sure that the search was going on and that you were searching documents, and so I would contact that person and give them the relevant information.

Question. And who would that person have been for you?

Answer. It varied. Usually it depended on each memo. I think they just assigned people——

Question. When you say "each memo," you mean the House memo, Senate memo?

Answer. Yes. I think so. I don't know. I think so. I mean, I don't know if maybe, if the search was the same, they had one person assigned to the same search or not. I don't remember.

Question. Did you generally deal with then three different people, one for each subpoena?

Answer. I dealt with several staff members and White House counsel regarding document requests. I've been there now for about 3½ years so I've dealt with several staff members on several searches.

Question. So you would collect these documents and then you would give these copied documents to the assistant and that person—what would happen next?

Answer. I don't know what happened with the documents from that point on.

Question. That was the end of what you had to do with it?

Answer. Yes.

Question. Did you work with anybody else in collecting the documents? I mean, was it like a team of people?

Answer. I did insofar as I checked with other First Lady staff members to make sure they had checked their own personal files, papers, records, phone logs. I responded usually on behalf of the office that the whole office had made their search.

Question. I see. So you were responsible pretty much for looking through your own documents and your own paper?

Answer. Yes.

Question. And not anybody else's?

Answer. I also looked through the chief of staff's phone logs, calendars, et cetera, and helped with her search.

Question. Would those be things that were normally kept in your possession?

Answer. Some were in my office and some were in her office.

Question. That was just something that you were helping out with?

Answer. Well, I was her assistant, so it was part of my duties, so to speak.

Question. So other than your own and the chief of staff's, did you go through anybody else's documents?

Answer. No.

Question. Do you recall if you were given a date as to when these documents were supposed to be reviewed and turned over to the White House counsel?

Answer. Yes. I don't recall the specific date, but I remember that there were always dates on those memos.

Question. Did they provide you with enough time to go through the documents?

Answer. I think so. I think it usually varied. I don't know if there was usually a 7-day period or how long the period was. I just remember there were usually dates by which point you were supposed to have responded to the White House Counsel's Office.

Question. Did you usually complete your search by that date?

Answer. Yes.

Question. Did most people usually complete the search by that date?

Answer. As far as I know.

Question. After you collected the documents and you would hand them over on the assistant, did you then ever sit down with the assistant and go through the documents?

Answer. No.

Question. They never asked you about any of the documents?

Answer. Not that I remember, no.

Question. Do you plan on speaking with White House counsel after this deposition today?

Answer. No.

Question. Moving on to something else. Ms. Ryan, can you briefly describe to me your employment history after college?

Answer. In September of '93, I started working at the Corporation for Public Broadcasting in their Office of Correspondent Communications. I was there until December of '93, and then I began in January of '94 as a White House intern in the Office of the First Lady. In September of '94, I started on the staff of the First Lady's office.

Question. That was September of '94?

Answer. Yes.

Question. And can you tell me, how is it that you even got the intern job in January of '94?

Answer. In the fall of '93, I applied to the White House internship program and was accepted in late fall, and then started in January.

Question. Did you tell me you were an intern for the First Lady's office?

Answer. Yes.

Question. And what did you do as an intern for the First Lady's office?

Answer. Answered phones, drafted correspondence, distributed mail, filed documents, updated the filing system. General intern-type duties.

Question. Were you assigned to any one person to assist them or just kind of everybody?

Answer. I worked for the Special Assistant to the chief of staff and the chief of staff.

Question. Just those two individuals?

Answer. Mainly. But they worked out of the main First Lady's office area. So we received all of the general public—the main phone calls to the First Lady's office came through that office as well as the mail. We were kind of at the center point of the office.

Question. Where were you located while you were an intern?

Answer. In Room 100 of the Old Executive Office Building.

Question. And they were over in the White House?

Answer. No, they worked in Room 100 as well.

Question. They worked in Room 100 also. Okay. Can you tell me the names of those two individuals?

Answer. The special assistant to the chief of staff at the time was Diane Lemo. And chief of staff to the First Lady was Maggie Williams.

Question. And then you told me you became a staff member in September of '94?

Answer. Yes.

Question. Do you remember when in September?

Answer. Late September.

Question. How did that happen? Were you approached about that?

Answer. Diane Lemo, the woman who I had been working closely with as an intern, I had worked with her as an intern for 8 months, she got a new job, and I had learned a lot of the ropes through Diane and so I was offered her job.

Question. Did Diane leave to—did she leave the White House or did she take another job in the White House?

Answer. She started working for the Office of Management and Budget.

Question. Obviously you accepted the job. Did you have to go through an interview process or anything?

Answer. I don't remember—I don't really remember it. I don't know. I remember it was—Diane had begun looking for a new job sometime in the summer, so I remember it was a long period where Diane was trying—she kind of was training me and passing a lot of stuff on to me. I don't remember there ever being any formal interview type of process.

Question. Did you speak with Maggie Williams about taking that job?

Answer. She was the one that offered me the job, yes.

Question. And you're still with the First Lady's office today—no, I'm sorry, you told me you recently left. And where are you now?

Answer. I am now the deputy director of scheduling for the First Lady, which is in the Office of Scheduling and Advance Staff.

Question. And where is your office located now?

Answer. It's in Room 185 1/2 of the Old Executive Office Building.

Question. 185 1/2?

Answer. Yes.

Question. Where was your office located as the special assistant for the chief of staff?

Answer. Room 100 of the Old EOB.

Question. Where was the chief of staff's office during this time?

Answer. Room 100 of the OEOB consists of three rooms. The main area where the door from the hallway is, off to the left of that room is the conference room, off to the right of that room is the chief of staff's office.

Question. And you were?

Answer. In the middle.

Question. In the middle?

Answer. Yes.

Question. Is that where people would enter?

Answer. Yes.

Question. The reception area?

Answer. Yes.

Question. Was there anybody else in the Room 100 area?

Answer. Volunteers and interns sat in the main reception area as well as me.

Question. Can you tell me a little bit about the First Lady's office? Because I understand it's divided up. First, you're over at the Old Executive Office Building and so is the chief of staff. Who else is over there?

Answer. Most of the staff is in the Old Executive Office Building. The Executive Assistant to the First Lady is in the West Wing, Mrs. Clinton's office is in the West Wing, the Social Office is in the East Wing, and that's about it.

Question. Otherwise, everybody else is——

Answer. Most everyone is in the Old Executive Office Building.

Question. Did the chief of staff have another assistant besides you?

Answer. Yes.

Question. Who was that?

Answer. When I started it was Evelyn Lieberman, and then it was Marge Tarmey, then it was Debbie Both, and then it was Peggy Lewis.

Question. Who is it now?

Answer. Melanne Verveer is currently the chief of staff and her assistant is Katie Button.

Question. How long was Debbie Both the assistant to the chief of staff?

Answer. Debbie Both, I believe was the assistant to the chief of staff 8 months perhaps.

Question. Do you know when her term started?

Answer. I seem to remember that it started in June of '95. I think. I think either May or June of '95. And I think she was there until around February, but I don't really remember.

Question. And how about Peggy Lewis, when she would have started?

Answer. She started then at around, February of '96, I think. And was there until April of '97, late March, early April.

Question. Can you tell me as the special assistant to the chief of staff, what were your job duties or responsibilities?

Answer. General assistant-type responsibilities. I kept track of the chief of staff's calendar, her phone messages, her phone log, her correspondence, oversaw the drafting of her correspondence, helped keep track of the filing system, served kind of as the main contact for the staff in terms of just general staff information. That's all I can really think of in terms of a specific description.

Question. Can you distinguish for me the difference between your job duties and responsibilities and that of the assistant to the chief of staff?

Answer. The assistant to the chief of staff, I think, had more project-oriented work with the chief of staff, where I think I was more assistant-type duties. The assistant to the chief of staff also served—I was a point of contact for the staff in terms of letting people know we're having a staff meeting or get your vacation time in at this point, but the assistant to the chief of staff served the function of dealing with the staff on more substantive issues, if someone was working on a project or, for instance, the director of the Correspondence Office usually reported to the assistant to the chief of staff in terms of correspondence issues for the First Lady.

The Social Office would report to the assistant to the chief of staff in terms of updating the chief of staff on Social Office updates and stuff like that. So they served in a slightly different capacity I think.

Question. Can you tell me, who was your immediate supervisor then?

Answer. I pretty much reported directly to Maggie Williams, purely because of the fact that I was there through the duration and there were different assistants in and out.

Question. Would the assistant have been in a supervisory role over you?

Answer. Yes, I suppose. But it never really seemed like that, mostly because honestly I was there longer and so they usually—it was more of a team relationship just because of the fact I think I had been there and just in general information type of sense. But we generally worked pretty separately on different things, so I worked with Maggie on certain things and the assistant would work with her on other things.

Question. And when did you tell me you recently left as assistant chief of staff?

Answer. I started this job in late March of '97.

Question. With your office in the Old Executive Office Building, were you at the White House very often?

Answer. It would depend. If I were delivering something or picking something up or going to a meeting, then I would be in the White House. Other than that, no.

Question. Did you ever assist—I know you mentioned organizing staff meetings. Did you ever assist in organizing senior staff meetings?

Answer. Yes.

Question. What did you do? How did you go about doing that?

Answer. I would find a time that worked with everyone in terms of—I would set up meetings. That was a typical duty of mine. Just in terms of finding the time when everyone could do it on a certain day and finding the people. I would just call other people's assistants and set it up through that manner.

Question. And who would normally be included in those senior staff meetings?

Answer. Senior staff meetings in the First Lady's office? The chief of staff, the deputy chief of staff, the social secretary, the press secretary, the director of scheduling. I think that's about—and the speech writer perhaps.

Question. Did you plan any other senior staff meetings besides those in the First Lady's office?

Answer. I took care of setting up a lot of different meetings. I would set up meetings—any meeting that Maggie was involved with. I wouldn't always set up, but I would also respond to people's calls who wanted to set up meetings.

Question. Would you generally always be notified if Maggie Williams had a meeting with somebody else or they wanted a meeting with her?

Answer. Generally, yes.

Question. They would go through you?

Answer. Yes.

Question. Did you ever attend any of these senior staff meetings?

Answer. No.

Question. Did anyone ever go and just take notes?

Answer. Generally, no. No.

Question. Did you ever attend—besides regular staff meetings, did you ever attend any other meetings with Ms. Williams?

Answer. Generally, no. She pretty much went to meetings on her own.

Question. Did the assistant to her chief of staff go?

Answer. They both went to the resident's meetings, which were the meetings that kind of kept track of the Social Office, and what was going on in the actual White House in terms of events, both the assistant to the chief of staff and Maggie would attend those meetings, but those are the only ones I think that the assistant attended, a meeting with her.

Question. Only the resident's meetings?

Answer. I think so.

Question. How often did those occur?

Answer. Those were weekly.

Question. Do you know who generally would attend that?

Answer. I think the President's schedulers, the First Lady's scheduler, the social secretary, and the chief of staff, Maggie Williams, and the assistant.

Question. Do you know if Maggie Williams had a practice of taking notes during meetings?

Answer. I don't know. I was—I can hardly remember ever being at a meeting other than staff meetings, big staff meetings, with her. So I don't know, and she never gave me notes, so I don't know.

Question. She never gave you notes to type up?

Answer. To file or type up, exactly.

Question. Do you know if Ms. Williams, did she type her own letter or memoranda or was that one of your duties?

Answer. Her correspondence was typed usually by the interns in the office. Memorandums, she sometimes typed them herself. Sometimes I would type them.

Question. When you would type them, would she give you handwritten notes of what she wanted or did she dictate the memorandum to you?

Answer. I don't really remember. I don't know. I can't remember. I don't remember dictation or anything like that.

Question. So she must have maybe handwritten it out?

Answer. Yes.

Question. Did Ms. Williams have a call list?

Answer. Yes.

Question. Did she keep the list or did you keep that list?

Answer. No. I would gather the messages generally from the outer main office area and the list—unless the assistant to the chief of staff was otherwise occupied and would switch it over to me, the list was generally kept on the assistant to the chief of staff's computer.

Mr. MCLAUGHLIN. Do you want to identify your staffers who are here now for the record?

Mr. LAWLER. I'm curious.

Ms. SAFAVIAN. I was going to say, Ms. Ryan, it's up to you.

Mr. MCLAUGHLIN. No, this is just a practice. You haven't taken any depositions before at this point. Usually just when somebody comes into the room we stop and identify who it is.

Ms. SAFAVIAN. That is fine.

Ms. Ryan, this gentleman sitting right here is David Bossie. He's the chief investigator with the Majority, and next to him is Jim Wilson. I just gave you a card. He's the senior investigative counsel with the Majority. I apologize for that.

EXAMINATION BY MS. SAFAVIAN:

Question. We were talking about the call lists and you were telling me that the assistant to the chief of staff, it would be kept on her computer?

Answer. Yes.

Question. Was she also the one, then, that would add the names and update the list?

Answer. Generally, yes.

Question. Did you ever add names to the list?

Answer. I kept track of the phone messages themselves in the outer office area so I would pass them along to her. So in that respect I did. Or if Maggie mentioned to me she wanted someone on the list, then I would let her know.

Question. So you would let the assistant know Maggie would like so and so on the list and they would take care of that?

Answer. Yes.

Question. Was the call list mainly for business, or was it also personal? Can you give me an idea of what was on the call list?

Answer. I think it was anybody that called the office for her, from what I can remember, any messages we received for her. So they were probably both business and personal.

Question. Ms. Ryan, I'm going to hand you this document. This is copy of an e-mail that you sent to Peggy Lewis on May 9, 1996. Would this be the time when she was assistant to Maggie Williams?

Answer. Yes.

Question. You're telling her that Maggie wanted John Huang's name to be added to her call list?

Answer. Yes.

Question. Is this normally the procedure you would go through to get names added to the call list?

Answer. Usually I would just tell her or call. I would imagine that she was not around at the time or it wasn't on a phone message slip.

Question. Who do you mean by "she"?

Answer. I'm sorry, Peggy Lewis.

Question. Can you tell me, do you know if there's any specific reason why Ms. Williams wanted to add John Huang to her call list on this specific date?

Answer. I don't know why, no.

Question. Would Ms. Williams usually tell you why she would want someone added to a call list?

Answer. No.

Question. She would just provide you with the name and number?

Answer. Yes.

Question. It also mentions, is Chuck Supple still on the list?

Answer. Yes.

Question. Do you recall who Chuck Supple is?

Answer. No. I'm just trying to figure that out. No, I don't know.

Question. Do you know if Ms. Williams was in contact often with John Huang?

Answer. I don't know, no.

Question. Do you recall taking messages for Ms. Williams from him?

Answer. I don't, so I would have to guess that—you know, I think I would remember, so I don't know.

Question. Do you recall setting up meetings with Ms. Williams and John Huang?

Answer. I don't, no.

Ms. SAFAVIAN. I was going to mark this as an exhibit. This will be ER–1.

[Ryan Deposition Exhibit No. ER–1 was marked for identification.]

[Note.—All exhibits referred to can be found at end of deposition.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, did you ever travel professionally with Maggie Williams?

Answer. No.

Question. Would anybody? Would her assistants?

Answer. She really didn't travel much. The—most of the staff went to the Democratic National Convention last year, but other than that, Maggie didn't do a lot of traveling. If she did travel, she traveled on her own.

Question. On her own, for business, she wouldn't even bring her assistant with her?

Answer. No.

Question. Did she travel often with the First Lady?

Answer. No.

Question. Do you know if Maggie Williams would interact at all or have any meetings with Harold Ickes?

Answer. I think so, yes.

Question. Was it often?

Answer. I don't remember how often it was or when it was. I remember that they met, but I don't remember how frequent or if there was any regularity to it.

Question. Would these be scheduled meetings?

Answer. I remember scheduling meetings. I don't remember when, but I remember at some point they were definitely on the schedule.

Question. Do you recall if these meetings with Mr. Ickes were just between Ms. Williams and Mr. Ickes or was it other people involved, also?

Answer. Probably both, but I don't remember specifically.

Question. Do you recall the purpose behind any of these meetings?

Answer. No.

Question. Ms. Williams is no longer the chief of staff as you already mentioned. When did she resign?

Answer. The beginning of May of 1997.

Question. Have you kept in contact with her since she's left?

Answer. Yes.

Question. How often do you speak with her?

Answer. Usually once or twice a week.

Question. Oh, really?

Answer. Uh-huh.

Question. And she's over in France; is that correct?

Answer. Not yet.

Question. Oh.

Answer. She leaves in a week or two, I think. Very soon.

Question. Do you get together for lunch?

Answer. Yes. She actually is a very close friend of mine. So I speak with her and occasionally see her.

Question. Ms. Ryan, can you tell me, were any DNC employees working at the White House from May 1995 through the 1996 election?

Mr. LAWLER. I don't want to cut you off, but just anticipating a following question you might want to ask her, and she can speak for herself, she may not discuss this investigation. They keep in contact, but Evan once this stuff came out was the first time she contacted us, we have asked Evan not to discuss the substance of any investigation or stories or whatever, particularly about the Johnny Chung stuff, with Maggie, so their contacts are personal and social rather than substantive.

Ms. SAFAVIAN. I'm sorry, were you trying to say that Ms. Williams contacted you after the articles regarding Johnny Chung were published?

Mr. LAWLER. No, no, she contacted us. Me.

Ms. SAFAVIAN. Ms. Williams contacted you?

Mr. LAWLER. No, no, Evan contacted me. She's my client.

Ms. SAFAVIAN. That's why I was trying to understand that.

Mr. LAWLER. Right.

EXAMINATION BY MS. SAFAVIAN:

Question. You were speaking to him about whether or not you could talk with Ms. Williams?

Answer. They just advised me not to.

Question. And so you have not spoken to Ms. Williams?

Answer. We have not spoken about any of this, no. Personal.

Question. You didn't talk at all about Johnny Chung or anything that was written in the newspaper articles?

Answer. She once mentioned to me that she was sorry that I was involved in this, she was speaking of the L.A. Times article, but that's all she said.

Question. And no further conversation on that subject?

Answer. She was inquiring as to how I was and said that she was sorry that my name is now out there and involved and she's sorry about that and I said, that's okay, and that was the end of it.

Question. We'll talk a little bit further about Johnny Chung, but getting back to the DNC, do you recall if there were any DNC employees working in the White House during the election?

Answer. I don't recall DNC. Just because of the news I know that at one point Barbara Woolley was employed by the DNC but a volunteer at the White House, but I'm not aware of that.

Question. I'm sorry, who was that?

Answer. Barbara Woolley. I just remember it from ABC News, but other than that, that's my only knowledge.

Question. Ms. Ryan, I'm going to hand you another exhibit. And you see that is a telephone message slip. It's to Maggie, who I assume is Maggie Williams.

Answer. Yes.

Question. It's from somebody named Adam, calling from Leon Panetta's office on May 22. From the cover sheet, you can barely make it out but it looks like '95 to me. Do you agree?

Answer. Yes.

Question. It's talking about a meeting from 2:00 to 2:30, a half-hour meeting on Wednesday, May 24, regarding DNC employees working at the White House.

Answer. Yes.

Question. Do you know who took this message? Do you know who those initials are?

Answer. I can't quite—it looks like an "E" and something else. It generally would have been a volunteer or an intern, and it looks like at 6:45—it must have been one of our evening volunteers. I would have to go back and—I don't know. I could check volunteer logs.

Question. Do you recall scheduling this meeting for Ms. Williams?

Answer. Not specifically, no. It's possible, but I don't recall it.

Question. Do you recall—did Ms. Williams ever speak with you later about this meeting regarding DNC employees working at the White House?

Answer. No.

Question. So as far as you know, you do not know of any DNC employees working at the White House?

Answer. I, as I said, heard it on the news one time, but other than that, no, I have no knowledge myself.

Ms. SAFAVIAN. We're going to go ahead and make this exhibit ER–2.

[Ryan Deposition Exhibit No. ER–2 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Can you tell me, did you have any specific contact with any DNC employees?

Answer. At the DNC?

Question. Yes.

Answer. Yes. I don't—I remember getting phone calls from the DNC or returning calls or talking to people at the DNC. I didn't have a specific person at the DNC that I spoke with, but I'm sure I spoke with the DNC on occasion.

Question. Do you recall speaking to any one individual more often than another?

Answer. No. I'm responding to this because I've been asked this before. I don't. I didn't have a person that I knew to call at the DNC. I probably was returning a phone call. There was no one person that I would call there.

Question. If you had to call someone at the DNC, who did you decide you would call or who do you speak to?

Answer. It would probably depend on what I was calling about, and I think I would call the main number and asked for whichever office I needed.

Question. How would you know which office you needed?

Answer. Depending on what it was, depending on what I was calling about.

Question. Were you calling on behalf of Maggie Williams or somebody else?

Answer. Oh, I don't know. I'm just speculating here.

Mr. MCLAUGHLIN. Don't speculate. The committee's not interested in guesses or speculation. Just stick to what's in your personal knowledge.

The WITNESS. I have no specific memory of contacting the DNC about any one specific event. I can't rule out. I'm sure I talked to them, I'm sure I did on occasion, but it's nothing that's imprinted on any memory.

EXAMINATION BY MS. SAFAVIAN:

Question. Could you tell me, would you have contacted the DNC because somebody asked you to?

Answer. Perhaps. But as I said, I don't remember.

Question. Was there—do you know if there was a specific liaison between the First Lady's office and the DNC?

Answer. Not to my knowledge.

Question. Do you know whether Maggie Williams participated in any DNC fund-raising activities during the 1996 election cycle?

Answer. Not to my knowledge.

Question. Do you know if Maggie Williams participated in any way with the 1996 Clinton/Gore Re-election Campaign?

Answer. I don't know.

Question. Do you recall ever scheduling any meetings for Ms. Williams regarding DNC fund-raising activities?

Answer. When I set up meetings for her, they generally weren't by topic. They were by individuals, so I don't remember specifically, no.

Question. So you don't have any specific recollection of scheduling a meeting for Ms. Williams with anybody at the DNC?

Answer. It's possible. I don't remember specifically.

Question. Okay. That's fine.

Did you ever arrange any meetings between DNC donors and the First Lady's office?

Answer. No. Not that I remember.

Question. Do you know if there was somebody in the First Lady's office who would arrange these meetings?

Answer. Between who?

Question. DNC donors and the First Lady or anybody else, Maggie Williams, anybody in the First Lady's office?

Answer. I would imagine any meetings that were set up between Mrs. Clinton and DNC donors or DNC employees would be set up by, where I am now, her scheduling office, which sets up all of her meetings. I don't remember setting up any meetings between Maggie and DNC donors myself. But, as I said, I typically knew them as individuals in terms of their names, not in terms of always who they were or what the meeting was about.

Question. Right. Okay.

Were you ever involved at all in arranging any meetings with the President's staff?

Answer. No.

Question. Was there anybody in the First Lady's office who would have been in contact with the President's staff to arrange meetings?

Answer. Between whom?

Question. Well, we could start just general. Any meetings. Have you had to schedule a meeting with the President or with somebody in his office? Is that something that you would do or would somebody else in the First Lady's office have a contact in the President's office?

Answer. I would only have been involved if it involved Maggie meeting with the President. If in terms of the President and the First Lady, that would be the First Lady's scheduling office who would deal with a meeting that anyone else was involved in.

Question. So her scheduling office would be the ones who would perhaps schedule a meeting with the President?

Answer. If it involved her. If it involved Mrs. Clinton.

Question. If it did not involve Mrs. Clinton at all?

Answer. We didn't deal with it, yes.

Question. Did you refer that person to somebody at the President's staff, in his office?

Answer. If somebody was looking to meet with the President?

Question. Yes.

Answer. We would refer them to the President's scheduling office. Not to a person specifically, but a phone number.

Question. Did you ever arrange any meetings with agency officials and DNC donors?

Answer. No.

Question. Do you know if anyone in the First Lady's office arranged such meetings?

Answer. No.

Question. Was the White House Mess ever used to entertain DNC supporters or donors?

Answer. Not that I remember. I know that Johnny Chung did eat there. That was by his request. No, it was never used to my knowledge to entertain DNC donors.

Question. Were you ever asked to make White House Mess reservations?

Answer. Yes.

Question. Did you always know who you were making them on behalf of?

Answer. Generally, I made them for lunches Maggie was going—for a lunch she was having with someone. I don't remember everybody that she had lunch with, so I don't know.

Question. Would you just make White House Mess reservations only when Maggie Williams was going to be having lunch there, for instance?

Answer. I dealt with her reservations, yes. On occasion, she—we used her account at the White House Mess and someone ate there on her account without her presence.

Question. So she would not always have to be present for someone to be able to eat in the White House Mess?

Answer. Right. Yes.

Question. But you would always schedule reservations under her name?

Answer. With her permission, yes.

Mr. LAWLER. You want to explain how you need an account? I mean, you couldn't make a reservation.

The WITNESS. Yes. I don't have a White House Mess account. People who work in the West Wing of the White House have Mess accounts, as do assistants to the

President. So in order to eat at the White House Mess, you have to have an account or be there on somebody's account.

EXAMINATION BY MS. SAFAVIAN:

Question. So how would somebody pay? Did you have to pay if you ate in the White House Mess?

Answer. It would be billed to that person's account and they would receive a bill monthly.

Question. When you say "that person's account," do you mean, for instance, Maggie Williams' account?

Answer. For whomever's account you're eating on, yes.

Question. What would Ms. Williams then do?

Answer. Generally she was reimbursed by whomever it was that ate lunch on her account. This wasn't often, though.

Question. So, for instance, you earlier mentioned Johnny Chung has eaten in the White House Mess. Do you know if that would have been on Ms. Williams' account?

Answer. Yes.

Question. So she would have gotten a bill showing that Johnny Chung had lunch there?

Answer. Yes.

Question. And showing the amount?

Answer. Yes.

Question. What would she then do to get reimbursed from Mr. Chung?

Answer. I can't remember how we worked that reimbursement or how that happened. I don't know if that day he reimbursed her. I don't know if later on. I don't remember how that worked. I'm sure there was reimbursement, but I don't remember.

Question. Would he have known right away how much it cost to have lunch there? Could Mr. Chung have known before he finished that it was going to cost him X dollars?

Answer. I suppose if he asked the people at the Mess he may have been able to find out. If not, it would appear on her bill that month.

Question. So she got a monthly statement?

Answer. Yes.

Question. Would the statement—how would she know on the statement who ate there and who gets the bill?

Answer. The statement just would say lunch for five or lunch for four. It would have the date and the amount.

Question. So how did they know? Did she keep track of it somehow?

Answer. I don't remember in this case; I don't know. I feel like I would be guessing.

Question. I don't want you to do that.

Answer. I don't remember specifically in this situation how we handled the billing. I don't remember.

Question. Is that something that you would have handled for her?

Answer. Probably.

Question. Is there anybody else who would have handled that for her?

Answer. If not me, then the assistant to the chief of staff would have been the other person. It would have been one of us. I don't remember specifically. It could be just because it didn't leave an imprint on my memory, but I don't know.

Question. Do you recall if—you would receive the monthly statement, and then would you like send out a letter?

Answer. I don't know. Perhaps. I don't know.

Mr. MCLAUGHLIN. Don't guess.

EXAMINATION BY MS. SAFAVIAN:

Question. I know you said it didn't happen very often. Do you recall who would have lunch at the White House Mess under Ms. Williams' account?

Answer. The only other person that I think had lunch on the White House Mess account and Maggie was not present was Mark Middleton.

Question. Was Ms. Williams usually present for all the other lunches?

Answer. Yes. She didn't really eat at the Mess that often.

Question. Would guests of hers be able to eat on her account? What I'm trying to get at, would she accompany the guests who would eat at the White House Mess more often that not or were they on their own without her present?

Answer. More often than not, she was with them. But even then that wasn't that often.

Question. And so you're telling me perhaps the only time when she wasn't present for lunch was when Mark Middleton was eating on her account?

Answer. I believe I remember one time when Mark Middleton had lunch at the Mess and she wasn't present.

Question. Is there any specific reason why she would or would not accompany somebody who was eating lunch on her account?

Answer. It was Mark Middleton's request of her after he had left the White House, he wanted to have lunch there and was wondering if he could put it on her account.

Question. Did he wonder if he could have lunch there without her present?

Answer. I think so. I think. It wasn't in terms of do you want to come to lunch. It was more like, I wanted to go to the Mess; do you mind if I use your account.

Question. And she didn't have a problem with that?

Answer. And she said it was okay, yes.

Question. Did she normally always say it was okay for somebody to eat on her account?

Answer. Generally it wasn't a request that was made that often from what I know, and she really didn't eat at the Mess that often.

Question. So to your knowledge you do not know if any DNC donors ever had lunch with Ms. Williams in the White House Mess?

Answer. I don't know.

Question. Do you recall ever requesting the DNC to reimburse for bills that were on the account?

Answer. I don't remember that, no.

Question. Did you ever arrange for a DNC donor to spend the night at the White House?

Answer. No.

Question. Did you ever arrange for anybody to spend the night at the White House?

Answer. No.

Question. Do you know if anybody in the First Lady's office was in charge of that responsibility?

Answer. I don't know.

Question. Did you ever arrange for DNC donors to fly aboard Air Force One or Air Force Two?

Answer. No.

Question. Did you ever arrange for anybody to fly aboard Air Force One or Air Force Two?

Answer. No.

Question. Do you know if anyone in the First Lady's office was charged with that responsibility?

Answer. Not that I know of.

Question. Did you ever arrange for DNC donors to attend White House private dinners?

Answer. No.

Question. Did you ever arrange for anyone to attend White House private dinners?

Answer. No.

Question. Do you know if there was anybody charged with that responsibility in the First Lady's office?

Answer. I would imagine White House dinners were Social Office functions. So I'm sure the social secretary was generally in charge of the guest lists.

Question. Did you ever arrange for any DNC donors to attend any function at the White House?

Answer. No.

Question. Did you ever arrange for anybody to attend a function at the White House?

Answer. Functions at the White House fell under the Social Office. They did all the inviting of any guest, whether it be by phone or by formal invitation in the mail, so it wasn't part of my duties.

Question. If someone would contact you or call you up and ask you, can I be invited to a function or dinner, what would you do with that request?

Answer. I would call the Social Office and give them that person's name and number and they would then handle it from there.

Question. Did you ever arrange for DNC donors to attend the President's radio address?

Answer. No.

Question. Did you ever arrange for anybody to attend the President's radio address?

Answer. If anyone made a request to attend the radio address, which I really don't recall, I would call Oval Office Operations and speak to someone. They were in charge of the radio address.

Question. You would speak to them and try and set up——

Answer. Pass on the person's information.

Question. And they would take it——

Answer. I think generally there's a waiting list. I've just heard of other people who have had family members get off the waiting list. I don't know. I don't remember ever doing it, no.

Question. So you would refer their name to somebody at that office?

Answer. Yes.

Question. Did you ever arrange for DNC donors to use the President's box at the Kennedy Center?

Answer. No.

Question. Did you ever arrange for anybody to use the President's box at the Kennedy Center?

Answer. Yes.

Question. And who would that have been; do you recall?

Answer. Maggie Williams. Perhaps another staff member. I don't remember. I just remember people have come to me either asking who they talk to or maybe I called, but I don't know. I remember calling on Maggie's behalf.

Question. Were you able to get her tickets?

Answer. Sometimes yes, sometimes no, I think. I don't remember. No, not often, but I would just remember it being maybe three times or so. I don't remember.

Question. Do you remember who the staff person was that you also tried to get tickets?

Answer. No. I think mostly people were asking me who they contacted if they wanted to go into the box. I don't remember, no.

Question. Do you remember who you would contact to get the tickets for Ms. Williams?

Answer. Yes.

Question. And who would that be?

Answer. Debi Schiff.

Question. And who is she?

Answer. She sits in the main reception area in the West Wing of the White House on the first floor.

Question. And who does she work for?

Answer. I'm not quite sure who her immediate superior is. I don't know what her title is. I think she is the VIP receptionist, the person who's in that main reception area in the West Wing.

Question. Is she the only person that you would contact about that?

Answer. She is in charge of the Kennedy Center box, yes.

Question. Did you ever arrange for DNC donors to attend movies at the White House?

Answer. No.

Question. Did you ever arrange for anybody to attend a movie at the White House?

Answer. No.

Question. Was there anybody in the First Lady's office who would arrange such evenings?

Answer. Not that I'm aware of. Ann Stock, the social secretary, but once again I don't know.

Question. You believe Ann Stock may have been the one to arrange that?

Answer. I believe she was in charge of all functions like that in the White House, any event, movies, dinners, official events, anything that took place in the White House. I believe Anne Stock was the person who was the point of contact or in charge of the event.

Question. Did anyone ever call and ask you to help them get a place at the White House movie, a spot to watch?

Answer. No.

Question. Did you ever arrange for DNC donors to use the White House tennis courts?

Answer. No.

Question. Did you ever arrange for anybody to use the White House tennis courts?

Answer. White House staff can use the White House tennis courts. They can call an office. I think there are certain days or certain hours it's available for White House staff to use the tennis courts. So I've done it myself. But other than that, I haven't arranged it for anyone else.

Question. Was there anybody in the First Lady's office who was in charge of arranging?

Answer. The tennis courts?

Question. Yes.

Answer. No. No.

Question. Did the DNC ever ask you to secure photos for DNC donors with the First Lady?

Answer. No.

Question. Did you ever secure photos with the First Lady with anybody?

Answer. I do now in my job as a scheduler, but, no, then, I never set up photos with Mrs. Clinton, no.

Question. Who would normally have set up those photos?

Answer. The scheduling office. The First Lady's scheduling office.

Question. Did you ever get requests from anybody asking if you can help them get a photo with the First Lady?

Answer. I think we received letters from the general public. I'm sure she received different requests. The volunteers in our office looked forward to having a photo with her. I remember they would talk about it. And Mr. Chung, as we know, was looking to get a photo with her in March of '95. Other than that, I can't recall specifically people asking for photos.

Question. Mentioning the interns and Johnny Chung, would they approach you about getting a photo with the First Lady?

Answer. Yes.

Question. And what would you do when a request like that came?

Answer. Generally the intern sessions last through the fall, the spring, and the summer. Each intern session we try to set up a photo at the end of the session with Mrs. Clinton and the First Lady interns. I would contact the scheduling office and they would try to find a time where it fit into her schedule.

Question. Would that be a group photo?

Answer. Group photo. Sometimes she would shake hands with the interns, and they would be able to take individuals. It depended.

Question. With regard to Johnny Chung, because you also mentioned him, he personally asked you to set up a photo with the First Lady?

Answer. He asked if I thought it would be possible to get a photo with the First Lady, yes.

Question. What was your response to that request?

Answer. I would check to see if it was possible.

Question. Was it possible?

Answer. Yes.

Question. How many times did he ask you to help him get photos with the First Lady?

Answer. That's the only time I can think of.

Question. It was one time?

Answer. Yes.

Question. And you were able——

Answer. He attended several Democratic Party events where he had photos with the First Lady, so he expressed an interest this time because he had guests with him.

Question. Do you recall what this time is?

Answer. March of '95.

Question. Was there any process you had to go through to be able to get this photo opportunity for him with the First Lady?

Answer. I mentioned it to Maggie Williams, and that was the last I dealt with it in terms of setting it up.

Question. So in that instance you went directly to Ms. Williams to take care of it instead of calling the First Lady's scheduler?

Answer. Yes.

Question. Any particular reason?

Answer. Well, because on this occasion Mr. Chung had several requests: He wanted to have lunch at the mess, he wanted a photo with Mrs. Clinton, he wanted a tour of the White House, and he wanted to see if he could get into the radio address. So I took all those requests in to Ms. Williams.

Question. I understand that you just scheduled the intern photos and one with Johnny Chung. Do you know——

Mr. LAWLER. Actually, she didn't schedule the one with Johnny Chung.

EXAMINATION BY MS. SAFAVIAN:

Question. Excuse me, you arranged at least for the interns to have a photo?
Answer. Yes.
Question. And you spoke with Ms. Williams about Johnny Chung's photo?
Answer. Yes.
Question. Do you know what the process was? Does someone have to pay for these photos with the First Lady?
Answer. Not to my knowledge, no.
Question. So you don't know if Johnny Chung or his guests had to pay for the photo they had?
Answer. I don't—I have no knowledge of anyone ever being charged for a photo, no.
Question. I want to just show you these. They are copies of four pictures that are taken with the First Lady with four different individuals. What I'm interested in with these photos is at the bottom of each photo.
Answer. Yes.
Question. They are addressed, I assume, to the individual in the photo?
Answer. Yes.
Question. For instance, the first one, which is Bates Stamped EOP 029612, says, "To," and I will try to pronounce this correctly, "Zheng Hongye," I am not really sure. It says, "With best wishes, HRC," Hillary Rodham Clinton?
Answer. Yes.
Question. Do you know the process, the procedure to get photos with the First Lady addressed and signed like this?
Answer. Yes. The Office of Correspondence does the calligraphy portion on the bottom, and they also have an autopen machine that can be used, although Mrs. Clinton also signs photos as well.
Question. She does?
Answer. Yes.
Question. So is there any way for you to tell whether this is an autopen or Mrs. Clinton's own signature?
Answer. No. I am fooled by the autopen, so I don't know which—I don't know.
Question. And who was it that you said had the autopen?
Answer. The Office of the First Lady's Correspondence.
Question. Would they be the only office who had the autopen with her signature?
Answer. I don't know if the general Office of Correspondence may have an autopen for her as well. I don't know.
Question. Was this normal? Would every photo with the First Lady be addressed to the individuals and then signed with her name?
Answer. We tend to do them for a lot of the photos, if the person requests it.
Question. And as far as you know, there is no charge for the photo or for the signature or anything like that?
Answer. Not to my knowledge.
Question. Do you happen to know the individuals in these photos? I know that's kind of hard to tell their faces, but their names are at the bottom. Do any of these names mean anything to you?
Answer. No, they don't.
Question. Do any of the faces? Do you recognize any of the faces?
Answer. I can tell that these are Johnny Chung's business friends that he had with him, but I don't know the names at all, no.
Question. Was this the March meeting that you mentioned earlier?
Answer. Yes.
Ms. SAFAVIAN. I'm going to go ahead and mark this as Exhibit ER–3.
[Ryan Deposition Exhibit No. ER–3 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Were DNC donors ever sent a birthday card from the First Lady?
Answer. I don't know.
Question. Were you in charge at all of sending out birthday cards from the First Lady?
Answer. No.
Question. Do you know if anybody was in the First Lady's office?
Answer. Probably the correspondence office, the Office of the First Lady's Correspondence. I can't say for sure.
I know that the Office of Presidential Correspondence sends birthday greetings from both the President and the First Lady. So I don't know if the First Lady's office sends just from the First Lady. I don't know.

Question. Have you ever gotten a request for a birthday card or anniversary card or any special event like that from the First Lady? Has someone contacted you about that?

Answer. We have a form. When I worked in this office, we had a form for events, a correspondence form, we could fill out for a birthday greeting, anniversary, birth of a child, graduation, congratulations-type form that you would fill out with the person's information and address, and we would send it down to the correspondence office. But it was for something from both the President and the First Lady. It wasn't specifically a First Lady letter, so to speak.

Question. And you would fill out those forms why? Was it in response to a request from somebody?

Answer. We filled them out for anybody that wrote into the office or called into the office.

Question. Anybody could do that?

Answer. Uh-huh.

Mr. LAWLER. I got a birthday card from Ronald Reagan once.

Ms. SAFAVIAN. Did you?

Mr. LAWLER. I got a postcard from Amy Carter.

Ms. SAFAVIAN. Well, I am even more impressed.

Mr. MCLAUGHLIN. I got one from Millie.

Ms. SAFAVIAN. Okay, you win.

EXAMINATION BY MS. SAFAVIAN:

Question. Were DNC donors or potential donors ever invited to have lunch with Maggie Williams?

Answer. Not to my knowledge, no.

Question. Do you recall ever scheduling any of these lunches for Ms. Williams?

Answer. I recall scheduling lunches for her, but they would be the individuals, same as her meetings. I don't know who they were specifically or what the lunches were for, but, no, I don't know that she ever had a lunch with donors or potential donors, no.

Question. When you were scheduling these lunches, did you ever have a list? Did you provide her with a list of the attendees?

Answer. No. I would schedule, I would put something on her schedule with the people's names who she was having lunch with, but I never had lists of—I don't believe she ever had a lunch where she needed a list of people.

Question. It was usually small lunches?

Answer. Yes. But, actually, she really didn't have many lunches; very, very few.

Question. About how many people would attend the lunch with Ms. Williams?

Answer. There's no set amount of people. There would be—I mean, this is if she was having lunch with someone, I would schedule it. I don't recall there ever being—there was never a set lunch where it would be a group of people for a specific purpose. That I have no knowledge of.

Question. And you said these lunches were not very frequent?

Answer. She rarely had lunches with people. She was pretty much at her desk or working. She wasn't out having lunch with people or in the mess having lunch with people.

Question. Do you recall then how many lunches you scheduled for Ms. Williams?

Answer. No, I don't know. I worked for her for a long time. I don't know. It's tough to gauge specific numbers.

Question. When you would schedule one of these lunches, was that usually Ms. Williams asking you to schedule a lunch, or somebody would contact you?

Answer. Or vice versa. If someone wanted to have lunch with her, you know, we would ask her if she was able to have lunch with them. If she had someone that she wanted to have lunch with, then she would say maybe I should contact them.

Mr. MCLAUGHLIN. Counsel, is this going somewhere relating to campaign fundraising?

EXAMINATION BY MS. SAFAVIAN:

Question. Can you tell me were DNC donors or potential donors ever invited to have lunch with the First Lady?

Answer. I don't know. That's something that the Scheduling Office probably would have dealt with. Nothing that was in my scope at that point.

Question. So nobody ever contacted you to arrange a lunch with the First Lady?

Answer. No, not that I remember. No.

Question. Let me show you this memorandum. As you can see, it is dated May 5, 1994. It's addressed to Ann Cahill from Martha Phipps regarding White House activities.

First of all, can you tell me do you know who Ann Cahill is?

Answer. The name is somewhat familiar, but no, I don't know specifically who she is.

Question. So you have never had any contact with Ms. Cahill?

Answer. Not that I remember. The name is vaguely familiar, but I don't remember her specifically.

Question. Do you know who Martha Phipps is?

Answer. Martha Phipps, I remember that name as a DNC name. I don't know how I know that.

Question. Did you ever have any contact with Ms. Phipps?

Answer. Possibly, because I do recognize that name more than I do Ann Cahill, but I don't remember a specific instance.

Question. Do you recall ever—first of all, ever seeing this memorandum? Please take a look at it and tell me if it looks familiar to you at all.

Answer. No, it doesn't.

Mr. MCLAUGHLIN. I note for the record that Evan Ryan's name does not appear in the memo.

EXAMINATION BY MS. SAFAVIAN:

Question. Let me start with the first paragraph. "In order to reach our very aggressive goal of $40 million this year, it would be very helpful if we could coordinate the following activities between the White House and the Democratic National Committee."

Were you aware that there was a $40 million goal for 1994 to reach?

Answer. No, I was not.

Question. Did anyone ever discuss any goals with you to reach for '94 or any year?

Answer. No.

Question. If you turn to the second page, number 16, it says, "One lunch with the First Lady per month. Contact: Maggie Williams."

Were you aware of these lunches with the First Lady once a month?

Answer. No.

Question. Do you know if Ms. Williams in fact scheduled these lunches with the First Lady?

Answer. I don't know, no. And, actually, I'm just noticing that at the time, I had been an intern there for three or four months in May of '94, so—but I don't know. No, I don't remember that at all.

Question. So this is not something that you assisted Ms. Williams in arranging?

Answer. No.

Ms. SAFAVIAN. Let's mark this exhibit ER–4.

[Ryan Deposition Exhibit No. ER–4 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Do you know whether the DNC ever asked the First Lady to make fund-raising phone calls?

Answer. No, I don't know. I have seen in another deposition, memorandums, but I had never seen them before.

Question. Do you know who Marvin Rosen is?

Answer. The name is familiar as a DNC name, but no.

Question. So you mention that you saw these call sheets during your Senate deposition?

Answer. Yes.

Question. Had you seen them before that?

Answer. No.

Question. Had you ever heard anybody talk about DNC call sheets for the First Lady prior to your deposition with the Senate?

Answer. No, I had not.

Question. That was your first knowledge of such call sheets?

Answer. Yes.

Question. Are you aware of whether or not Ms. Williams ever contacted the First Lady about these calls?

Answer. I don't know.

Question. Would you know whether the First Lady made any fund-raising calls?

Answer. I don't know.

Question. Are you aware that the First Lady attended a series of coffees held at the White House during 1995 and 1996?

Answer. I believe both the President and the First Lady did, I think. My knowledge is basically based on media accounts, though, so I don't have any specific recollection from my work experience, no. Once again, that is a scheduling issue which I was not a part of.

Question. So you never scheduled for the First Lady any of these coffees?

Answer. I was working last year still for Maggie Williams. I only moved over to the Scheduling Office in March of '97. So, no.

Question. Did Ms. Williams ever ask you to assist in scheduling one of these coffees?

Answer. No.

Question. Let me back up, I guess, for a second. Were these coffees with the First Lady ever discussed? Did Ms. Williams ever discuss these?

Answer. No.

Question. So the only way you even know that the First Lady attended coffees was from news accounts?

Answer. I think that's what my knowledge is based on. I don't remember ever in the office hearing about the coffees specifically, no.

Question. And you never assisted Maggie Williams with scheduling coffees?

Answer. No. I would be surprised if Maggie was involved in the scheduling of the coffees. I don't know.

Question. Why do you say that?

Answer. Well, because I think I would know if she were involved in setting up these coffees. But I don't remember that at all, so——

Question. Do you ever recall Maggie Williams having to approve an attendee list for one of these coffees?

Answer. I don't remember that, no.

Mr. LAWLER. Would this be a good point to take a break for a couple of minutes?

Ms. SAFAVIAN. Absolutely.

[Brief recess.]

EXAMINATION BY MS. SAFAVIAN:

Question. Just finishing up real quickly with the coffees we were talking about before the break.

Did you ever happen to see any spreadsheets prepared by the DNC regarding the coffees and how much money they raised or may have raised, given to Maggie Williams or for the First Lady or anything like that?

Answer. No.

Question. Do you know who Truman Arnold is?

Answer. I believe that name is associated with the DNC, but I don't know in what capacity.

Question. Have you ever had any contact with him?

Answer. No.

Question. Do you know whether or not Mr. Arnold ever visited the First Lady or Maggie Williams?

Answer. No.

Question. Do you know who Bernard Rapoport is?

Answer. No.

Question. Michael Berman?

Answer. Yes.

Question. Who is he?

Answer. I forget name of the firm he works with, but I have met him on occasion.

Question. Where have you met him?

Answer. In the office.

Question. And why was he there?

Answer. I believe he was at meetings in our office.

Question. Who was he meeting with; do you remember?

Answer. I believe there were big meetings because—I remember there being a lot of people. I don't remember specifically who was in the meeting.

Question. Do you recall if Maggie Williams was in the meeting?

Answer. I think she was.

Question. Do you recall if the First Lady was in the meeting?

Answer. I don't think so, no.

Question. Was he around often? Can you give a number to the number of times?

Answer. No, I'm not sure.

Question. How about Ron Perelman?

Answer. I know who he is, not—I just know the name.
Question. Have you ever met him?
Answer. No.
Question. How about John Phillips?
Answer. No.
Question. Do you know who Webster Hubbell is?
Answer. Yes.
Question. Have you ever met Mr. Hubbell?
Answer. No, I haven't.
Question. Have you ever spoken with Mr. Hubbell on the telephone?
Answer. No.
Question. Do you know if Mr. Hubbell ever had meetings with Maggie Williams?
Answer. No, not that I know of.
Question. I can try to summarize this a little bit. Are you aware of any legal problems that Mr. Hubbell had with his former law firm, the Rose Law Firm?
Answer. No.
Question. Do you recall any discussions around the office about Mr. Hubbell and any of these problems?
Answer. No.
Question. Did Ms. Williams ever discuss with you Webster Hubbell or any of these problems?
Answer. No.
Question. Do you know who Amy Stewart is?
Answer. No.
Question. Do you know who David Kendall is?
Answer. Yes.
Question. Who is he?
Answer. He is the Clintons' attorney.
Question. He's the Clintons' personal attorney?
Answer. I believe he's Mrs. Clinton's attorney. I don't know if he is the President's as well.
Question. Does he work for the White House?
Answer. No. Personal attorney, yes.
Question. Have you ever met Mr. Kendall?
Answer. Yes.
Question. And what were the circumstances surrounding that meeting?
Answer. I have met him—I know him, and I have met him. I don't remember meeting him. I don't remember at what point I met him. I'm sure it was in the office, but I don't remember.
Question. Did someone introduce you to him?
Answer. No. If he came to my office, he probably introduced himself.
Question. Do you recall a meeting in March of '94 that Ms. Williams may have attended with David Kendall regarding Webster Hubbell?
Mr. LAWLER. Were you even in the office in March of'94?
The WITNESS. I had just started as an intern then. I don't remember that, no.

EXAMINATION BY MS. SAFAVIAN:

Question. Would you say that Ms. Williams knew Mr. Hubbell fairly well? Did they meet often?
Answer. I never saw them meet. I don't know if she knew him well or not.
Question. Do you know if she knew him at all?
Answer. I don't know.
Question. Do you know who Ernie Green is?
Answer. I have heard the name before. I believe he might be involved with an African organization, but I don't remember which.
Question. Have you ever met him?
Answer. No.
Question. Do you know if he's ever been in contact or had a meeting with Maggie Williams?
Answer. I don't know.
Question. And you mentioned Mark Middleton's name earlier?
Answer. Yes.
Question. How well do you know Mr. Middleton?
Answer. I have met him on several occasions, and I have talked to him on the phone. I definitely know who he is.
Question. What were the circumstance surrounding the first time you met Mr. Middleton?

Answer. He used to work at the White House, so I probably met him when he was an employee still at the White House.

Question. Do you know when Mr. Middleton left the White House?

Answer. I don't remember.

Question. Do you know while he was at the White House, did Maggie Williams and Mark Middleton have much contact with each other?

Answer. I don't remember.

Question. Do you know whether or not they had much contact with each other after he left the White House?

Answer. I remember that he called her on a couple of occasions, and he may have met with her, too, on a couple of occasions, but that's all I remember.

Question. Do you recall what any of those meetings or those phone calls were about?

Answer. No. He would call me sometimes to leave messages for Maggie or to get in touch with Maggie. I don't remember specifically what it was about.

Question. Did he ever tell you the purpose of his phone call?

Answer. I have a memory of—no. Phone calls, no. I have a memory of one meeting being about a Presidential library, something or other, but I don't remember anything more than that.

Question. Do you recall the time frame of this meeting?

Answer. No.

Question. Were you present during any meetings that Maggie Williams would have had with Mr. Middleton?

Answer. No.

Question. Did you ever clear or wave Mr. Middleton into the White House?

Answer. Not that I remember, but I probably did.

Question. Do you recall any of the times you may have, was it just Mr. Middleton, or did he have guests with him?

Answer. I don't recall.

Question. Ms. Ryan, I am handing you WAVE records, Worker And Visitor Entry records, in which you asked access for Mark Middleton. I want to quickly go through these.

On the first page you will see that on April 1, 1995, you were listed as both the requester and the visitee?

Answer. Yes.

Question. Did Mark Middleton meet with you on this day?

Answer. Not that I remember.

Question. Can you maybe give me some background on these WAVE records and actually requesting somebody be waved into the White House?

Answer. On the computer WAVE request, it automatically comes up with your name, the person's name whose computer you are at, so that would be the requester. A visitee is something that can be typed in right there next to the requester's name. You have to type in the time, the date, the room number they are going to, and the person's name, date of birth and now social security number.

Question. Is this something that you would do personally when you were waving someone into the White House?

Answer. Yes.

Question. So do you actually have to go to the computer and type all this in?

Answer. Yes.

Question. Is that located where a visitor would enter the White House?

Answer. This is my computer at my desk. I'm able to type this information in. It goes to the WAVE center, and the uniformed Secret Service guards who are at the gate have computers at the gate.

Question. So they would get this information that you typed in?

Answer. Yes. I believe it goes through—I don't understand the process, but I believe it goes through a Secret Service WAVE center and goes then to the uniformed guards at the desk.

Question. How much time before a visitor would enter the White House would you need to get this information into the computer?

Answer. Generally, I think, at least within the half-hour before.

Question. So just a minimum of a half-hour before the person was waved in?

Answer. I don't know what the specific time frame needs to be, but I can do it up until pretty close to when a person is coming.

Question. So someone could call you and say, I'm coming over in 10 minutes, and that would be no problem? You could still get the information in, and they could still come into the White House?

Answer. I could either type it into the computer, or I could call the WAVE center and deliver the information over the phone.

Question. So if I see your name as the requester, does that mean that you are the one that personally typed this information into the computer?

Answer. Yes.

Question. Is there any specific reasoning why you would put your name as a visitee if Mr. Middleton was not visiting with you?

Answer. I sometimes just put my name in, probably because I knew him, and he called and said he was coming over. It is just habit sometimes. I sometimes put my name in and sometimes put Maggie's name in. There was really no—if I knew Mark Middleton, which I did, I probably just typed my name in.

Question. So on this specific date, April 21, 1995, do you remember if Mr. Middleton met with you on that date?

Answer. I don't remember why he was there.

Question. Would Mr. Middleton ever stop by the White House to have a specific meeting with you?

Answer. No.

Question. They would always be with somebody else?

Answer. Yes, or he may have wanted to come drop something off. At one point I remember he picked a photo up from us, so I don't know if this was when that was. I don't know.

Question. Who would Mr. Middleton usually meet with if he asked you to wave him into the White House?

Answer. I remember he met with Maggie on a couple of occasions. So possibly it was Maggie.

Question. If you turn to the next page, it shows the next visit is on May 9, 1995, and this time you have the visitee as Williams?

Answer. Yes.

Question. Would that be Maggie Williams?

Answer. Yes.

Question. Do you recall the circumstance or the purpose of this visit?

Answer. No.

Question. Can you tell me, would you meet Mr. Middleton down at the entrance or the gate and actually bring him into the White House? Or what was the process for him to get into the White House?

Answer. No, he would come up to our office.

Question. So you would not actually go down to the door, the front door, for instance?

Answer. No.

Question. Did people who normally visit the White House or your office have to be accompanied by somebody?

Answer. No. They can enter the White House and come up to our office on their own. Only press are escorted within the Old Executive Office Building.

Question. Is that the same policy for the White House?

Answer. No, in the White House you need a staff member with you.

Question. At all times?

Answer. Yes.

Question. So the fact that Mark Middleton used to work at the White House, that didn't give him any special privileges to be able to walk around freely without being accompanied by somebody?

Answer. In the White House?

Question. In the Old Executive Office Building.

Answer. In the Old Executive Office Building people can walk around unaccompanied unless you are a member of the press.

Question. Okay. And in the White House even Mr. Middleton would have to be accompanied by somebody?

Answer. Yes.

Question. So when I see that the location and the room, and for that I see O and 100, that would stand for?

Answer. Room 100 of the Old Executive Office Building.

Question. And that's where you're located?

Answer. Yes.

Question. The next one, the next visit, is May 19, 1995. There it shows once again that you requested it, he's meeting with Maggie Williams, or at least Williams' name is listed?

Answer. Yes.

Question. And this time there's a W, a 2FL, slash, WW. What does that stand for?

Answer. Second floor, West Wing.

Question. So would that mean that is where the meeting took place?

Answer. Yes.

Question. Do you recall this meeting on this date?
Answer. No.
Question. Now, for this instance where he is actually going to the White House, would you go down and meet with him and then escort him to this meeting with Ms. Williams?
Answer. Possibly, but not necessarily. It's also possible that when he entered, Debi Schiff, who is in the reception area, can call Maggie up in her office, and she can come and get him.
Question. But somebody would have had to?
Answer. Somebody, yes.
Question. Do you know where in the West Wing meetings were held?
Answer. For Maggie Williams?
Question. Yes.
Answer. She has a West Wing office as well as an office in the Old Executive Office Building.
Question. So they would normally be held in her office?
Answer. Yes.
Question. How about meetings with her in the Old Executive Office Building?
Answer. They would occur either in her office or in our conference room.
Question. How about in the East Wing?
Answer. I don't know—I have never dealt with meetings in the East Wing.
Question. Let's see. Let's turn the page. The next one is May 19, 1995. Again you are the requester and Williams is the visitee. Do you recall the circumstance of this visit? I'm sorry, are these—I think this is——
Answer. It's the same one.
Question. I think this is perhaps out of order. I'm sorry, that's right. The next page, I'm sorry, does not show Middleton, and it is hard to read, but it says Ng Lapseng.
Mr. LAWLER. I think we are off on the pages.
Ms. SAFAVIAN. Bates Stamp Number 056855.
Mr. LAWLER. Okay.
Ms. SAFAVIAN. Are we on the right one now?
Mr. LAWLER. Yeah, it's the right page.

EXAMINATION BY MS. SAFAVIAN:

Question. And this is for a May 19, 1995 visit?
Answer. I don't think we can see that.
Mr. LAWLER. We are on the bottom?
Ms. SAFAVIAN. The very last line.
The WITNESS. Oh, right.
Mr. LAWLER. I can't make any name out at all.
The WITNESS. We cannot really read it.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you see in the beginning where it says Ng, N-G?
Mr. LAWLER. No.

EXAMINATION BY MS. SAFAVIAN:

Question. At the end, Lapseng, L-A-P-S-E-N-G.
Mr. LAWLER. Ng is the only thing on this copy.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, can you make that out?
Answer. I can make out Ng, yes.
Question. First of all, do you know who Ng Lapseng is, also known as Mr. Wu?
Answer. No.
Mr. LAWLER. If you say that's what's on here.

EXAMINATION BY MS. SAFAVIAN:

Question. It is my belief that is the name that is there. I agree with you it is hard to read.
You do not know who this individual is?
Answer. No.
Question. Not knowing who this individual is, why would you have requested his entrance into the White House?

Answer. At someone's request. I don't know. I mean, I have down here that he's visiting Maggie Williams, but I don't remember this.

Question. This entry and the one prior that we just talked about for Mark Middleton show that they are meeting both with Maggie Williams for the same time meeting and that they arrived at the same time. And you can take a look at that real quick to verify that I am accurate with that.

Answer. Yes.

Question. Would that have been the same meeting with Ms. Williams?

Answer. Yes.

Question. Does that at all refresh your recollection as to the purpose behind this meeting?

Answer. No. I would not—and, no, I don't know the purpose. There's one thing that I can speculate. As I recognize this meeting is at 1:15, which is—there are two lunch times at the Mess. One is at noon and one is at 1:15. And as I say, I can remember Mark Middleton having lunch at the Mess on occasion on Maggie Williams' account, and this may have been the occasion.

Mr. MCLAUGHLIN. So the answer to that question is based on speculation?

The WITNESS. Speculation only on the fact I have cleared them in at 1:15, which is one of the two times for lunch at the Mess. If they met with Ms. Williams, I have no idea what they met about.

EXAMINATION BY MS. SAFAVIAN:

Question. So you don't actually recall, once again, actually bringing this individual Ng Lapseng to the meeting with Ms. Williams or to the White House Mess?

Answer. No.

Question. Do you know if Ms. Williams met often with Ng Lapseng?

Answer. No.

Question. The next page shows three entries. They all have you as requester, and they all have Williams as the person being visited. The dates are June 5, 20 and 29th, 1995.

Do you recall the circumstance of any of these visits with Mr. Middleton?

Answer. No, I don't.

Question. The next one is a July 21, 1995 visit. Once again you requested him, and he's meeting with Williams.

Do you recall the circumstance of this visit?

Answer. No, I don't.

Question. The next page shows four entries: September 12th, twice on the 15th, and once on the 26th.

Do you recall the circumstance of these visits?

Answer. No, I don't.

Question. Do you know why he would be visiting twice on the same day?

Answer. No. No.

Question. Can you give any reason why the second time on the 15th was at 8 p.m.?

Answer. I don't know.

Question. Did Ms. Williams often have meetings late into the evening?

Answer. No.

Question. Could this have been a function at the White House or——

Mr. LAWLER. That would be speculation, and she said she doesn't know.

The WITNESS. Yeah, I don't know.

EXAMINATION BY MS. SAFAVIAN:

Question. The next page shows a November 25th, 1995 visit.

Do you recall the circumstances of that visit?

Answer. No.

Question. The one after that is November 2nd, 1995.

Do you recall that visit?

Answer. No.

Question. The next one is February 14th, 1996. Once again, you are the requester, and it shows that he's meeting with you.

Would he have met with you on that date?

Answer. I don't remember that, no.

Question. The next one is September 25th, 1996. Do you recall the circumstances of this visit?

Answer. No, I don't.

Question. And once again it shows that he's meeting with you.

Mr. LAWLER. Well, Jennifer, in all fairness, I think what it shows is, based on her testimony, that she would put her name in sometimes if he was coming to the office at which she was physically located.

I don't think it's her testimony, nor is it accurate, that the name in the visitee column where she appears means necessarily a meeting in the sense of any formal substantive contact or agenda.

The WITNESS. That is true.

EXAMINATION BY MS. SAFAVIAN:

Question. I understand that just because your name is down there does not mean he actually met with you. That is all I'm asking. I just want to know if you recall any specific instance where he actually did come to meet with you specifically.

Answer. No.

Question. Do you recall any time that Mr. Middleton would come and meet with Maggie Williams and then meet with anybody else?

Answer. No.

Question. September 25th, 1996. Do you recall the circumstance of that visit?

Answer. No.

Ms. SAFAVIAN. I will mark that for the record ER–5.

[Ryan Deposition Exhibit No. ER–5 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Do you know whether Mr. Middleton ever met with the First Lady?

Answer. I don't know.

Question. Would Mr. Middleton contact you often regarding being able to enter the Old Executive Office Building or the White House or for any other reason?

Answer. I think he contacted me occasionally, not often. I would say no.

Question. Can you tell me what the purpose of those calls were for?

Answer. The only one I remember specifically is that there was a photo he was looking for, and we located it for him, and he came to pick it up at the office.

Question. Let me pass this to you. This is going to be, again, several telephone messages that were taken, that were calls from Mark Middleton or somebody in his office. Most of them, if you will flip through them, you will see the messages are to you. The first one, however, which is EOP 059041, who is that? I can't read—I don't know who that is addressed to.

Answer. That's to Marge Tarmey.

Question. And then the other ones, I believe, are each addressed to you; is that correct?

Answer. Yes.

Question. We will just go through these quickly. The first, which is not to you, but it shows Middleton calling to make—he is asking for lunch reservations for seven be made under Maggie's name.

Is this something then that you would have taken care of even though this is not addressed to you?

Answer. Either myself or Marge Tarmey.

Question. I'm sorry, who is Marge Tarmey?

Answer. She was the assistant to the chief of staff at the time.

Question. So you don't specifically recall setting up this reservation for Mr. Middleton?

Answer. No.

Question. The next one, the message is dated 6/7/95. The message says, Monday, Mess, two people, 12 or 1:30. Do you recall arranging this reservation for Mr. Middleton?

Answer. Not specifically, no.

Question. The next one is dated 10/4/95. He is once again asking for Mess reservations for four people in this instance.

Do you recall this reservation?

Answer. I don't recall it specifically, no.

Question. The next one is dated 7/20/95. It says, 12 for three people. I'm guessing that would be a 12 noon reservation for three people?

Answer. Yes.

Question. And it looks like they are listing the names. Those numbers next to the names, would those be birthdates?

Answer. Yes.

Question. And those are necessary for what?

Answer. To clear people into the building.

Question. Do you recall making this reservation for Mr. Middleton?

Answer. I don't.

Question. And the last one is dated 1/17/96. Once again he is asking for reservations in the Mess for four people.

Do you recall making this reservation for him?

Answer. I don't, no.

Question. Now, we spoke earlier about mess reservations and Mark Middleton, and you told me that on at least one occasion he called and asked for reservations to be made under Maggie Williams' name, and she did not attend.

Answer. Right.

Question. Do you think that for these other times when he called—first of all, do you think for these other times he called you would have made these reservations?

Answer. It's possible.

Question. Every time he would call, what was the process you would go through to see if you could get him these reservations?

Answer. I would ask Maggie, and if she said yes, then I would contact the Mess.

Question. What was Maggie's usually response when you asked her or told her Mark Middleton was asking for reservations?

Answer. Usually yes.

Question. Usually it was yes?

Answer. Yes.

Question. Do you know if Ms. Williams would have attended each of these?

Answer. No, I don't think she did.

Question. Did you ever meet any of the guests that he brought with them?

Answer. Not that I remember.

Question. Was anyone ever concerned that Mark Middleton was using the White House Mess too often?

Answer. Not that I know of.

Question. And once again you mentioned who would pay for using the Mess. Middleton would have had to pay for his use of the White House Mess; is that correct?

Answer. Yes.

Question. And once again he would have received a bill you believe?

Mr. MCLAUGHLIN. We have already been over this, counsel. This has been asked and answered.

The WITNESS. Maggie received the bill, and then she is reimbursed.

EXAMINATION BY MS. SAFAVIAN:

Question. And this would apply to Mr. Middleton also?

Answer. Yes.

Question. Were you the sole person who took care of White House Mess reservations?

Answer. No. I took care of Maggie's reservations.

Question. So you would most often be in contact with Middleton because he would usually call to have them made under Williams' name?

Answer. That would be why he was calling me, yes.

Question. Debbie Both?

Answer. Yes.

Question. You mentioned her earlier. Would she also have taken care of any reservations for Middleton?

Answer. It's possible.

Question. Do you know who Lynn Cutler is?

Answer. Yes.

Question. Who is she?

Answer. She works in the Office of Intergovernmental Affairs at the White House.

Question. There's another telephone message slip that I am showing you. This one is dated—oh, I'm sorry, I think that's the wrong one.

Would Maggie Williams meet with Lynn Cutler often?

Answer. I think she knew Lynn Cutler. I don't remember how often they met or if they met.

Question. Would you have any reason for Maggie Williams, Mark Middleton and Lynn Cutler to have a meeting together?

Answer. I don't know.

Question. Do you know who Yusuf Khapra is?

Answer. Yes.

Question. Who is he?

Answer. I believe he used to work for Erskine Bowles when Erskine Bowles was deputy chief of staff.

Question. Would he often contact your office on behalf of Mark Middleton?

Answer. I don't remember. I don't know.

Question. If you will take a look at that for me. This is another telephone message slip. It looks like it's addressed to you; is that correct?

Answer. Yes.

Question. And the caller was Yusuf Khapra; is that correct?

Answer. Yes.

Question. And the message says Mark Middleton?

Answer. Yes.

Question. Do you know why he would be calling on behalf of Mark Middleton?

Answer. No.

Question. Did you speak to Mr. Khapra often?

Answer. Not really, no.

Ms. SAFAVIAN. Why don't we go ahead and make that exhibit ER–6.

[Ryan Deposition Exhibit No. ER–6 was marked for identification.]

Mr. LAWLER. Are you making the other one——

Ms. SAFAVIAN. Yes. I'm sorry, why don't we make that one ER–6 and then this latest one ER–7.

[Ryan Deposition Exhibit No. ER–7 was marked for identification.]

Mr. LAWLER. Counsel, just for the record, I have been looking at the clock. We have been going about half an hour now since the break asking Ms. Ryan questions that she doesn't know anything about; or if she knows anything about, she knows very little about. She took phone messages as part of her job.

We are here voluntarily. We want to answer your questions. I am certain—and you told me that you want to ask her about Johnny Chung's March 9 visit. We talked about a time deadline. It is 20 minutes of 5:00. We can let the deposition go until 6:00. Again, you can do whatever you want, but Ms. Ryan does have information about the Johnny Chung visit that I think would take you some time to go through; and to the extent that we waste time this afternoon on questions that she doesn't know anything about, or that I fail to see any relevance to, it will be difficult for us to agree to continue this deposition to talk about the stuff she does know about.

So, again, do whatever you want, but I am concerned about the time.

Ms. SAFAVIAN. I understand the time constraint, and I am doing the best I can to get through this. However, because I do not know what Ms. Ryan's knowledge is, I do have to ask. And I understand that you say she doesn't have knowledge about these areas, but I don't know that until I ask.

Mr. LAWLER. Even if she does, I am saying she does have knowledge about Johnny Chung, and her name has been brought up in a way completely false. News reports about her and Johnny Chung are false. The story about Johnny Chung last night, the quotes attributed to her are false. She wants an opportunity to put on the record that those things were false. They are directly relevant, it seems to me, to your investigation. It was certainly something she was asked about in the Senate investigation.

All I'm saying is she knows about that. It is an important point to set the record straight on, and I suggest since we are here, you might want to do that, make sure we get that on the record, and then continue on with some of these other ancillary issues, if you will. It's just a timing thing.

Ms. SAFAVIAN. I understand what you are saying, and I appreciate that.

EXAMINATION BY MS. SAFAVIAN:

Question. Before we get to Johnny Chung, I want to ask you about Charlie Trie. Do you know who he is?

Answer. I know of him through news accounts.

Question. Only through news accounts?

Answer. Yes.

Question. Did you ever meet him?

Answer. No.

Question. Do you know if Charlie Trie ever visited with Ms. Williams?

Answer. No.

Question. Do you know if Charlie Trie ever had any business in the White House?

Answer. No.

Question. Let me show you another telephone message. Can you tell me who it is addressed to, because I'm not sure I can read that name?

Answer. Melanne, M-E-L-A-N-N-E.

Question. And who is she?

Answer. She was the deputy chief of staff at the time.

Question. For the First Lady?

Answer. Yes.

Question. As you can see, this says Charlie Trie called, that he had spoken with HRC, Hillary Rodham Clinton, in Little Rock about going to Beijing. Wants to know if he can go with her.

Do you know what Beijing trip that this is referencing to?

Mr. LAWLER. She has testified she doesn't know anything about Charlie Trie other than news reports. This document is not addressed to her.

Ms. SAFAVIAN. But I am asking about the Beijing trip for the First Lady.

Mr. LAWLER. You could have asked her that separately from the document than to try—well, do it however you want. It just doesn't seem, particularly tied to her previous answers and in general, the Beijing trip doesn't seem of any relevance since it's so broad.

The WITNESS. I would only say Mrs. Clinton went to Beijing at around this time, so that must be what it refers to.

EXAMINATION BY MS. SAFAVIAN:

Question. Were you at all involved in the arrangements for Mrs. Clinton going on this Beijing trip?

Answer. No.

Question. Was Ms. Williams?

Answer. Possibly. I was not aware of her involvement.

Question. Do you know whether Charlie Trie attended this trip with her?

Answer. I don't know.

Question. Do you know whether Johnny Chung attended this trip with the First Lady to Beijing?

Answer. I don't know.

Ms. SAFAVIAN. Let's make this Exhibit Number ER–8.

[Ryan Deposition Exhibit No. ER–8 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Moving on to Johnny Chung. Obviously, you know who Mr. Chung is?

Answer. Yes.

Question. Can you tell me when you first met Mr. Chung?

Answer. I don't remember my first meeting with him.

Question. Do you recall when it was?

Answer. No, not specifically, I really don't.

Question. Do you recall how you met him?

Answer. I recall meeting him at some point in the Old Executive Office Building, stopping by our office, but I don't remember when it was.

Question. Did somebody introduce you to him, or did he just kind of introduce himself to you?

Answer. I believe he introduced himself.

Question. After you met him, did you inquire with anybody else in the office as to who he was?

Answer. At some point I remember finding out who he was. I don't remember how that came about or what the instance was.

Question. And what did you find out about him?

Answer. That he was a trustee of the DNC.

Question. Was that all that you heard about him?

Answer. That he was from Los Angeles and ran a fax business from out there.

Question. Do you know who told you all this about him?

Answer. I think Maggie Williams, but I don't remember specifically.

Question. Were you aware he was a large contributor to the DNC?

Answer. I became aware of that.

Question. Would Johnny Chung visit the First Lady's office often?

Answer. Yes.

Question. Could you say how many times?

Answer. He visited Washington, and I would say any time he was visiting Washington, he would stop by. I don't know what the frequency was or exactly how many times it was.

Question. Did it seem to be every time he was in Washington he would stop by?

Answer. That was my impression.

Question. And what gave you that impression?

Answer. It was just the way he was. I had the impression that if he were in town, he would definitely take the opportunity to stop by.

Question. Was there any reason to him stopping by?

Answer. It was my impression that he thought that he was friendly with people in our office, and it was definitely my impression that he thought rather highly of Mrs. Clinton and was a fan of hers, so to speak. So it seemed he liked to come by the office, and any sort of association he could have he enjoyed. That was my impression.

Question. Who did he normally meet with when he would stop by?

Answer. He didn't have meetings in the office. He would stop by and generally say hello, and I sat in that main reception area, so he generally would talk to me.

Question. Would he then move on and speak with other people, or can you just tell me a little about some of his visits, what he would do?

Answer. His visits consisted of him talking. That was about it. He would stop by and he would talk and talk, and that was about it.

Question. What would he talk about?

Answer. He would talk about himself, his business, his travels, any events he had been to recently. He, on a couple of occasions, requested tours of the White House.

Question. On a couple of occasions?

Answer. Yes.

Question. Who would he make that request to?

Answer. Either myself or the Visitors Office directly.

Question. And when he made the request to you, what did you do about them?

Answer. Contacted the Visitors Office.

Question. Was that as far as you went with his request?

Answer. It generally is not a problem to set up tours. It's a relatively easy thing to set up. So I would try to check with them as to the availability and then see what we could do.

Question. How many times do you recall that he asked for a tour to the White House?

Answer. At least twice, maybe more than that.

Question. Did he have other people with him that he wanted to be on the tour?

Answer. Yes, usually.

Question. Large groups of people?

Answer. No. The largest group I remember is the group he brought in March of '95.

Question. When he asked you for a tour, you would just contact——

Answer. The Visitors Office.

Question. The Visitors Offers. And they would take care of it from there?

Answer. Yes.

Question. Did Mr. Chung usually call before he would stop by?

Answer. Yes.

Question. And who would he contact when he would call?

Answer. Me usually.

Question. And what would he say to you?

Answer. That he was in Washington, he would love—he generally would say, I would love to stop by and say hello. And then when—I think when I resisted more, he started calling from the lobby to be cleared in.

Question. From the lobby of where?

Answer. Of the Old Executive Office Building.

Question. And what do you mean you started resisting?

Answer. I think it became more apparent to him that I would say we were busy and we didn't have the time, or I think actually maybe a couple of times he would call and I either wasn't there or didn't take the call. So I think he then figured out if he was standing in the lobby, he could pretty much insist on why couldn't someone clear him in.

Question. And would somebody normally clear him in?

Answer. Yes.

Question. And how often would he just show up in the lobby and ask for clearance?

Answer. That was something I think—it seemed to be a pattern he developed later. Initially he would call from his office or from his car. But I remember several occasions where he would call and say I'm in the lobby.

Question. And once again, did he give you any reason for wanting to stop by?

Answer. It was to visit the office and to say hello and I'm in town. He thought of himself as a good friend of—you know—I think he thought that, you know, we were excited to see him the way he was excited to see us. That was my impression.

Question. Was that the case? Were you excited to see him?

Answer. No, not necessarily, no.

Question. Why do you say not necessarily?

Answer. I think, you know, at first I didn't really know who he was. He's perfectly nice, he really is. He's fine. But he just has a tendency to talk a lot and to linger, and my desk being where it was situated, it was difficult to get work done if someone's standing and talking to you for an extended period of time.

Question. How long would he normally stay and talk?

Answer. It depended and it varied. I'd say probably the longest would be close to 25 to 30 minutes.

Question. And would he spend most of that time with you just talking?

Answer. Yeah. I was really the only person that he could get to, because I was in the reception area.

Question. So in the beginning I guess you didn't have a problem with Mr. Chung?

Answer. No.

Question. Did he at some point become a nuisance?

Answer. Yes, I think at some point I found it to be a nuisance, his visits being a nuisance.

Question. And do you recall when you started to feel he was a nuisance?

Answer. I don't remember when it was. No.

Question. Can you just give me a general time frame? Would it have been 1995, 1996? Before that?

Answer. I would say 1995 at some point, but I don't remember when.

Question. Do you remember was it like towards the end of the year?

Answer. I don't know.

Question. When he would just stop by to chat, did he usually have somebody else with him?

Answer. Occasionally, he did.

Question. Do you recall who any of those people were?

Answer. Usually, they were somebody who worked with him, an assistant or someone would accompany him.

Question. Who worked for him?

Answer. Yes.

Question. Did Mr. Chung attend any luncheons with the First Lady?

Answer. Not that I know of.

Question. And once again you told me you did not prepare the list of attendees for the First Lady's lunch.

Do you know if Mr. Chung was invited to a lunch, how he would have been invited?

Answer. No.

Question. You mentioned earlier that he felt that he was a friend of the First Lady's?

Answer. Yes.

Question. Do you happen to know what the First Lady thought of him?

Answer. No, I don't know.

Question. Did Maggie Williams ever comment to you at any time about Mr. Chung?

Answer. I'm sure—I don't remember specifically. I remember I knew about Mr. Chung from Maggie Williams, so—I mean, I knew of him through her.

Question. Did Maggie Williams and you ever talk about the fact that he's stopping by too often, I can't get my work done, what am I supposed to do? Did you ever have any of those type of conversations with Ms. Williams?

Answer. Yes.

Question. And what was her response?

Answer. Her response was, you know, he was harmless, it seemed to please him, so you know, what was the harm. We might as well just put up with him.

Question. So Ms. Williams never felt like you should put a stop to him stopping by and chatting?

Answer. No, no.

Question. So she didn't have any problem with him coming up as often as he did?

Mr. LAWLER. My problem is characterizing how Ms. Williams felt about him. Her testimony is what she said.

EXAMINATION BY MS. SAFAVIAN:

Question. That's fine. But Ms. Williams never said, okay, don't stop sending him up, you can tell him, no?

Answer. She never said that, no.

Question. Did the DNC ever contact you or anybody else in the First Lady's office regarding Johnny Chung and any special request on his behalf or ask you to help him out with any favors?

Answer. Not that I know of, no.

Question. No one at the DNC ever contacted you?

Answer. No.

Question. Why don't we talk about the March 8, 1995, meeting with Johnny Chung. Do you recall meeting with him on that date?

Answer. Yes.

Question. Do you recall him asking you whether he could get a five-member delegation of executives from the China Chamber of Commerce to have lunch in the White House Mess?

Answer. Yes.

Question. Do you recall him asking for a meeting with the First Lady?

Answer. Yes.

Question. What else did he ask for?

Answer. A tour of the White House and to have he and his guests admitted to the radio address that Saturday.

Question. How did Mr. Chung ask these requests of you?

Answer. He stopped by the office and he asked to speak with me and he said he had these men visiting from China, and that he would like to see if he could get them a tour of the White House, to the White House Mess, if he could get them into the President's radio address and if he could get a photo with Mrs. Clinton.

Question. And what was your response to those requests?

Answer. I said we would check and see. But he had also mentioned at the time that he was donating money to the DNC.

Question. If you could, let's try and backtrack a little bit here. Did Mr. Chung call you on his way over that day?

Answer. No.

Question. How did he get to your office that day?

Answer. He showed up.

Question. Do you know who let him in?

Answer. Only because I've seen WAVE records and the Senate deposition, I believe they show that Brian Bailey waved him in.

Question. And who was that?

Answer. He worked for Erskin Bowles, who was Deputy Chief of Staff at the time.

Question. Let's just take a quick look at that.

I'm handing you WAVE records from March of 1995, showing Johnny Chung being waved into the White House.

It shows—did you say the name was Bailey that you mentioned earlier?

Answer. Yes.

Question. And it shows the room was 174.

Answer. Yes.

Question. Where is that?

Answer. That's in the Old Executive Office Building down the hall.

Question. Who does Bailey work for?

Answer. At the time he worked for Erskin Bowles who was then the Deputy Chief of Staff.

Question. Do you know why Johnny Chung would have met with Bailey?

Answer. No.

Question. Have you ever spoken to Bailey about Johnny Chung?

Answer. No.

Question. So Mr. Chung just appeared in the reception area of your office?

Answer. Yes.

Question. And you were not aware that he was there that day?

Answer. No.

Question. He then asked you to help him out with these requests for his business associates?

Answer. Yes.

Question. When did he mention to you that he was donating money?

Answer. When he was asking me for these requests. For the tour, the lunch, at the same time.

Question. I'm just trying to get an idea of the sequence of the conversation that you had with him. I know you can't, of course, recall the exact words that were used.

Answer. I don't remember the sequence. I don't remember whether he mentioned it first or second in terms of the requests and the donation or vice versa.

Question. What did he tell you about the fact that he was going to make a donation?

Answer. He said he was in town, he was here in Washington, he often mentioned that, too, when he would stop by, and said while I'm here, I'm donating money to the DNC.

Question. And that was what he said to you on this visit?

Answer. Yes.

Question. Did he tell you how much he was donating to the DNC?

Answer. At some point I became aware of the $50,000 amount. I don't remember when that was. I don't know if it was at this time or if it was the next day when he actually came. I don't know when. But I did know at some point $50,000.

Question. And you knew that from Mr. Chung himself?

Answer. Yes.

Question. You are aware that Mr. Chung has—there's been an account of this day in the Los Angeles Times as well as other newspaper articles. There was also an interview with Mr. Chung with Tom Brokaw just last night on NBC Nightly News and Dateline. Are you aware that Mr. Chung relates the account that he asked for these requests and he had asked if you could help in any way and after meeting with Maggie Williams, you came back and said, well, yes, the First Lady could use some help paying off an $80,000 Christmas party bill that she owes the DNC. Are you aware of that account?

Answer. I'm aware that that is his account, yes.

Question. Did you talk to Maggie Williams about Mr. Chung's request?

Answer. Yes, I did.

Question. When did you speak with her?

Mr. LAWLER. Can you just ask her if that account is true?

Ms. SAFAVIAN. I will. My first question is, is she aware of it, and she is aware of it.

Mr. LAWLER. Yes.

EXAMINATION BY MS. SAFAVIAN:

Question. So you did meet with Ms. Williams?

Answer. Yes.

Question. And when was that?

Answer. Right after I spoke with Mr. Chung, I went to speak to Maggie Williams.

Question. Was Mr. Chung still there, still in the reception area when you spoke with Ms. Williams?

Answer. Yes.

Question. What did you tell Ms. Williams?

Answer. I said that Johnny Chung was here and he had some businessmen from China here and he was hoping to get the tour, the radio address, the Mess and the photo with Mrs. Clinton, and he was also going to be donating money to the DNC while he was here.

Question. You told Ms. Williams as you were telling her what he wanted, you told her at that time that he was going to donate money to the DNC?

Answer. Yes.

Question. Did you give her an amount?

Answer. I don't remember giving her an amount. So I don't think I knew it at that point, but it's possible that I did. I don't remember.

Question. What was Ms. Williams' response?

Answer. Her response was we would see—you know, we'd see if we could set those things up for him and that it was helpful to know about his donation because then maybe that would enable the DNC to pay off some of their debts.

Question. What do you mean by their debts?

Answer. Some of the DNC's debts to the White House.

Question. The DNC's debts to the White House?

Answer. Yes.

Question. Did the First Lady owe any—did she have any debts with the DNC?

Answer. No. It was my understanding that the DNC owed the White House money.

Question. Was that for a Christmas party, as Mr. Chung has mentioned in his account?

Answer. I didn't know what it was for.

Question. Did Ms. Williams ever tell you or suggest to you an amount of money that Mr. Chung could donate or could contribute?

Answer. No, she never did.

Question. Do you have any idea where Mr. Chung has come up with you suggesting $80,000 to help pay off a Christmas party for the First Lady?

Answer. No, I don't.

Question. Did you ever mention a bill of $80,000 to the DNC to Mr. Chung?

Answer. No.

Question. Did you ever mention any debts that the DNC owed to Mr. Chung?

Answer. Not that I remember, no.

Question. After you spoke with Ms. Williams, what did you do next?

Answer. I went out to Mr. Chung and I told him we were going to try to set up what we could, set up of his requests, and he was going to contact me later that day.

Question. What did he say in response to that?

Answer. He was very pleased. He was excited at the prospect of being able to get at least some, a couple—some of these things done. And he said he hoped that Maggie got credit for his donation.

Question. What did he mean by that?

Answer. I don't know. I have no idea what he meant some of the time, but I don't know what he meant at that time, either.

Question. When did he mention that to you, that he hopes Maggie gets account——

Mr. LAWLER. Credit.

EXAMINATION BY MS. SAFAVIAN:

Question. I'm sorry, credit for his donation?

Answer. I can't remember if that's verbatim or how he said it, but it was something along those lines, like I hope Maggie gets this credit for this donation, and it was more a statement, but I remember that's what he was saying as he left.

Question. When Ms. Williams had mentioned that she seemed pleased to you that Mr. Chung mentioned he was going to donate to the DNC, do you have any idea how she knew that perhaps that donation would go to pay off some debts?

Answer. Oh, I don't know. It was more—I don't remember exactly what she said, but it was something along the lines of that's helpful to know, that they're getting this donation, maybe it will help with some of the debts that they owe the White House. That's the general gist of what I got from her. I don't know.

Question. Did Mr. Chung ever tell you about these guests that he wanted to bring with him?

Answer. He had told me that they were businessmen visiting from China.

Question. Did he ever tell you who they were? Specifically by name?

Answer. He may have. I don't remember that.

Question. Did he happen to give you their business cards?

Answer. Not on that day, no, he did not.

Question. Did he give you their business cards on another day?

Answer. The next day when they arrived, they, themselves, handed me business cards.

Question. But Mr. Chung never gave you their business cards?

Answer. No.

Question. Did you inquire with him as to who are these people that you want to bring to meet with the First Lady?

Answer. No, I just knew that they were businessmen visiting from China.

Question. Was it something that is normally done when people want to bring individuals or guests to meet with the First Lady, do you normally have to know who these individuals are and is there usually a security clearance? What's the process generally to meet with the First Lady?

Answer. Well, when I would clear them in, I would need their passport numbers, if they were from another country, and that would go through the WAVE system, so that would be the security check for them.

Question. And that was all that you would have to do?

Answer. Yes.

Question. For instance, with these businessmen, you did eventually get their passport numbers?

Answer. Yes.

Question. Mr. Chung left on the 8th?

Answer. Yes.

Question. You told him you would look into his requests?

Answer. Yes.

Question. And that he was supposed to call you later that day?

Answer. Yes.

Question. Did he contact you later that day?

Answer. Yes. I don't remember it specifically, but he must have, because we did set everything up. I did communicate to him. I don't remember my conversation with him.

Question. Can you tell me—when did you know that this was all set up? Was it later that day?

Answer. I contacted the Visitors Office about the tour. I contacted the Mess about the lunch, and I don't know how Maggie Williams handled the photo, setting up the photo with Mrs. Clinton. And the radio address, I don't remember how that was handled.

Question. So by the end of that day, March 8, the day that he requested these favors, if we want to call them that, by the end of that day, each one with the exception of the radio address, because you said you don't know about that, the White House Mess, the tour, the photo with the First Lady, each one of those were scheduled, they were set?

Answer. Yes.

Question. And you had notified him by the end of that day?

Answer. Yes. I don't remember specifically talking to him later that day, but as I said, it was set up so it's probable that I spoke with him that day.

Question. Do you recall Mr. Chung returning on March 9, the next day?

Answer. Yes.

Question. And were you aware that he was returning on that day?

Answer. Returning?

Question. I'm sorry, that he was arriving on March 9?

Answer. Yes.

Question. This was not a surprise visit?

Answer. No.

Question. Tell me a little bit about that visit.

Answer. I remember when he and his guests came to the White House, I escorted them over to the White House Mess for their lunch and I can't remember how it worked, although the WAVE records have helped me in the sequence, and I believe what then happened is Ann McCoy from the Visitors Office took them on their tour following lunch. I believe they then left the White House because they returned later that day and I only know this from these WAVE records.

Question. And we can take a look at that right now. They do show that there are two entries for March 9?

Answer. Yes.

Question. An your name is listed for both of those. So you would have entered this into the computer for both times?

Answer. Yes.

Question. And do you know why he would have left and come back?

Answer. I believe, this is based on how I've seen these WAVE records. I have a recollection of when they returned that they were late—I remember that they were late in coming to the White House when they came to have their photo with Mrs. Clinton.

Question. How late were they?

Answer. I just remember in my mind thinking to myself, where are they, because I remember the photo had been set up and so I remember when they arrived, I went to go meet them at the entries of the OEOB so we could go directly over to the White House.

Question. So they arrived in the reception area, Mr. Chung and the delegation, and you then escorted them to the White House Mess?

Answer. That's my memory, yes.

Question. And they had lunch there. And then is it your——

Answer. I don't have a real memory past that. I'm guessing, because I don't remember escorting them out of the Mess and I don't remember them again until they came to the OEOB Pennsylvania Avenue entrance later that day. I would imagine that Ann McCoy had done taking them on their tour directly after the Mess.

Question. And then the next time you saw them was when they were entering the Old Executive Office Building again?

Answer. Yes.

Question. And you then escorted them to the First Lady's office for the photo?

Answer. Actually, to the Map Room on the ground floor of the White House.

Question. When Mr. Chung arrived on that day, it is his account of the story that he handed you an unsealed envelope, is that true?

Answer. No.

Question. Did he hand an envelope to Maggie Williams?

Answer. Yes.

Question. So Ms. Williams did meet with him that day?

Answer. I believe it was after the photo. I remember that Mr. Chung was insistent that he wanted to hand this envelope directly to Maggie Williams. I remember he really wanted to see her and hand the envelope to her. I think it was after the photo that we went back to the office since they had been late arriving for the photo, and I remember telling Maggie that he was there and that he wanted to hand her this envelope.

Question. This is returning after the photo shoot to the Old Executive Office Building, returning there?

Answer. Yes, returning.

Question. Did he return with the delegation or was it just Johnny Chung?

Answer. With the delegation.

Question. And that is when you contacted Ms. Williams that he was there and that he wanted to speak with her?

Answer. That's my memory, yes.

Question. And so what happened next?

Answer. I remember relaying that to her and she looked up at me and she looked a little bit confused at why he wanted to do this or why he was doing this, but then she just, okay, fine, let's just get it over with or whatever.

Question. And what did she think she wanted to do? What was she confused about?

Answer. Why he was delivering a donation to the DNC through her.

Question. So you had told her that he wanted to hand this check personally to her?

Answer. Yes. I mean, I had never seen the check, I knew he had an envelope and he said it was his contribution and that he wanted to—he wanted to deliver it to her to deliver to the DNC. He was rather insistent. So I explained that to her and she seemed a little confused by that, but then she just said, okay, fine, whatever, let's just deal with him.

Question. So you never actually looked at the check?

Answer. No.

Question. But he told you that I have a check in my hand and I want to give it to Maggie Williams?

Answer. He—I don't know at some point implied—he had an envelope that he wanted to give to her and he referred to it as the conclusion.

Question. So you told Ms. Williams about that and she seemed confused at why he wanted to do it that way, but she still went to meet with him?

Answer. Yes.

Question. What happened next?

Answer. As I remember, she said fine, so I went and got Mr. Chung, he came in to her office in the Old Executive Office Building, I walked in with him and he handed her the envelope. I remember it being very, very brief and then he left.

Question. Did he say anything to her?

Answer. I don't remember standing near them. I think I stood by the door and she was over by her desk and I believe he just walked over and gave her the check, or the envelope, and—I don't remember hearing anything between the two of them. I don't know.

Question. How long do you think this meeting lasted?

Answer. Oh, it was like a minute, maybe 2 minutes.

Question. And then what did Mr. Chung do?

Answer. Then he left.

Question. And his delegation left with him?

Answer. Yes.

Question. Had Mr. Chung mentioned any time prior to this that he had a donation he wanted to give to Maggie Williams?

Answer. I remember at some point hearing from him that that's what he wanted to do. I don't remember when. I remember immediately prior standing with him and he was insisting that that's what he wanted to do. I can't remember if he had mentioned it to me before that as well or not.

Question. Do you know if Mr. Chung tried or wanted to give this donation to the First Lady?

Answer. I don't know that he did, no.

Question. After Mr. Chung left, did Maggie Williams do anything with the check, with the envelope?

Answer. Not that I know of, no.

Question. Did she say anything to you about it?

Answer. No.

Question. Nothing further was mentioned about it?

Answer. No.

Mr. LAWLER. Evan had to leave. Her brother was playing in a big east tournament in New York, so she left.

The WITNESS. I left immediately after Mr. Chung left.

EXAMINATION BY MS. SAFAVIAN:

Question. And what time do you think that was?

Answer. Somewhere in the area of 3 o'clock or so, somewhere in that vicinity I just remember part of the reason why I remember him being late is I was conscious of the fact that I had to leave and I had to leave by a certain time, so I remember being very conscious of the time, and I remember leaving almost immediately after he did.

Question. Do you know how much time he spent with the First Lady, taking these photos?

Answer. Just a couple of minutes.

Question. Did you stay with him the whole time?

Answer. Yes.

Question. And it was just a couple of minutes?

Answer. Yes.

Question. Can you tell me what happened there?

Answer. I remember we got to the Map Room and she showed up a few minutes later, walked in, and shook everyone's hand as we saw in the photos and then took a group photo and then she left.

Question. Do you recall the First Lady saying to Mr. Chung as she entered the room, "It's good to see you again, my old friend," or anything like that?

Answer. She did not say anything regarding—I know he has said that she said "Welcome, my good friend." She did not say that.

Question. She did not say that, you know that for sure?

Answer. Yes, I would remember that and that's not at all what she would say. I remember a general greeting like, hello.

Question. She knew who he was?

Answer. Yes.

Question. So she immediately greeted him, went right to him?

Answer. I think so.

Question. Then, did he introduce her to the delegation?

Answer. I just remember she went and shook everyone's hand.

Question. And the photos were taken?

Answer. Yes.

Question. Did anything else occur?

Answer. No.

Question. And then the First Lady left the room?

Answer. Yes.

Question. And then you brought them back to the Old Executive Office Building?

Answer. Yes.

Question. And the reason you brought them back to the Old Executive Office Building, is that because Mr. Chung insisted on meeting with Maggie Williams?

Answer. Probably, yes. There would have been no other reason.

Question. You mentioned that the First Lady knew Mr. Chung and greeted him by name.

Mr. LAWLER. She said hello.

The WITNESS. Yes, I don't remember if she greeted him by name. She recognized him.

EXAMINATION BY MS. SAFAVIAN:

Question. She recognized him.

Do you know what relationship Mr. Chung has with the First Lady?

Answer. I don't know. I know Mr. Chung talks about meeting Mrs. Clinton in Little Rock and I know he credits her for inspiring him in his business and inspiring him, so to speak. So I think that was the basis of his fondness for her. But that's only from Mr. Chung that I know that.

Question. Do you know if they had met numerous times, I mean other times besides Little Rock and then this one photo opportunity?

Answer. I don't know.

Question. Did Mr. Chung ever comment to you on having just visited the First Lady or going to see the First Lady or any of his contacts with the First Lady?

Answer. No. He mentioned attending Democratic party events, but he didn't mention Mrs. Clinton specifically.

Question. Do you know whether or not the First Lady was aware of the contribution that Chung had later that day given to Maggie Williams?

Answer. I don't know.

Mr. LAWLER. I think to set the record straight, Chung has stated in media accounts that Evan said she did know, that the First Lady did know about the account. Again, just to close the loop, I think out of fairness you might ask that and then ask if it's true.

Ms. SAFAVIAN. I was about to.

Mr. LAWLER. Again, I know it's hard to keep track, before when we asked whether Chung—you said whether Evan was aware of Chung's version of whether Evan then solicited $80,000 and I asked you to ask if it was true and you said you were going to get to it and you haven't. Again, that's something that's not true. Just to keep the record straight.

Ms. SAFAVIAN. I believe we did go through each of those accounts. You have given me your version of what happened and you claim that Chung's version is not accurate; is that correct?

Mr. LAWLER. She's testified it's not true.

Ms. SAFAVIAN. We've gone through that.

Mr. LAWLER. But for clarity of the record, I think if there's a media account and his version is false, to put on the record what his version is categorically for her to say, she answered the question, obviously, but the answer is that it's not true.

Mr. MCLAUGHLIN. Is there any reason not to ask the witness that question?

Ms. SAFAVIAN. I think we've already covered that.

Mr. LAWLER. I know we did because I asked you to.

Mr. MCLAUGHLIN. He's made a request. It's a perfectly reasonable small request. Why don't you just ask her on the record if Chung's account is true as to those matters.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, I believe I did ask you the question whether the account was accurate. I will give you this opportunity to say what you would like to about that.

Answer. Which part are we talking about?

Question. They're talking about the news accounts.

Mr. LAWLER. Whether it is true that you ever solicited $80,000 for a debt for a Christmas party from Mr. Chung.

The WITNESS. I never did, no.

And I think the other point was he says that he asked me whether Mrs. Clinton was aware of the donation.

EXAMINATION BY MS. SAFAVIAN:

Question. Right. That's where we were.

Answer. Right. No. He never asked me and I never responded, so I never responded to such a question because he never asked me that.

Question. So his version, him asking you does the First Lady know about the contribution and him saying you said, oh, yes, she does.

Answer. Is not true.

Question. That's not accurate?

Answer. Correct.

Question. You mentioned earlier Mr. Chung also asked you to help get his guests admitted to the radio address of the President?

Answer. Yes.

Question. Did you do anything in response to that?

Answer. I don't recall—I don't recall how that was handled. I don't recall if I called over to the Oval Office operations or if Maggie did. I don't remember dealing with the radio address at all.

Question. So you're not aware of how he gained access to the radio address?

Answer. No.

Question. This is a memorandum——

Mr. LAWLER. You want to mark this as an exhibit?

Ms. SAFAVIAN. We may go back to it.

Mr. LAWLER. And mark it then?

Ms. SAFAVIAN. Yes, I will.

EXAMINATION BY MS. SAFAVIAN:

Question. This is the memorandum from Betty Currie dated, March 28, 1995. Who is Betty Currie?

Answer. She works right outside the President's Office in the Oval Office.

Question. Do you know what her duties are?

Answer. I'm under the impression she's an assistant.

Question. The memo states, Ceandra Scott called. She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the radio address. Apparently they were in Maggie's office when the request came and Maggie said she didn't know, but to contact DNC.

First of all, who is Ceandra Scott?

Answer. I don't know Ceandra Scott. I've heard her name before, but I don't know her.

Question. Do you know what this memo is in reference to?

Answer. I could speculate. I've never seen the memo and I don't know specifically what they're talking about.

Mr. MCLAUGHLIN. Don't speculate.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you know whether the DNC was contacted?

Answer. No.

Ms. SAFAVIAN. Why don't we mark this as an exhibit. We're on ER–9.

[Ryan Deposition Exhibit No. ER–9 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Are you aware that, first of all, are you aware that Mr. Chung and his delegation attended the Presidential radio address?

Answer. Yes.

Question. Are you aware that after the radio address the President had his picture taken with the Chinese delegation?

Answer. Yes.

Question. And how were you aware of that?

Answer. Because Mr. Chung approached me to obtain those photos.

Question. Do you recall when he did that?

Answer. I believe it was late March, early April of '95.

Question. Let me show you some more telephone messages. There are three contained in this. The first two are addressed to you from Johnny Chung, and the third one, if you could tell me who that's addressed to.

Answer. Marge Tarmey.

Question. Each one of these are talking about the pictures. The first one addressed to you, the date is April 3 of '95. It says, and the message, "regarding pictures," in parentheses, "actually he called for Gina who wasn't here and then he asked for you." Who's Gina?

Answer. Gina was an intern in our office.

Question. Was this the first time that Mr. Chung contacted you, around this date was the first time Mr. Chung contacted you about these photos?

Answer. I don't know, because I don't remember this message specifically, so I don't know.

Question. Do you recall the next message, which is to you from an Irene over at the AISI?

Answer. Not this particular message. It's hard for me to recall exact phone messages from that time.

Question. And yet the third one is another one from Irene in Johnny Chung's office. Each one of these are talking about photos, pictures. Would these have been about these photos with the President?

Answer. Yes.

Question. So Mr. Chung contacted you and what did he ask of you?

Answer. He asked if I could find the photos for him.

Question. And what did you say?

Answer. I said I would check and see, that I would look into it.

Question. And did you?

Answer. Yes.

Question. And what did you find out?

Answer. I found out that they were being withheld pending NSC looking into the individuals in the photos, to make sure it was okay to release them.

Question. Did you find out anything else?

Answer. No.

Question. Did you get a date as to when they were going to be released?

Answer. No. They just told me that the National Security Council was looking into who these people were, so they were holding on to the photos until they knew it was okay to give it to them.

Question. Do you know why the NSC was looking into these individuals?
Answer. No.
Ms. SAFAVIAN. Let me make this an exhibit, these message sheets. This will be ER–10.
[Ryan Deposition Exhibit No. ER–10 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Do you know if Mr. Chung contacted anybody else, for assistance, with getting these photos?
Answer. I don't know.
Question. Do you know who Don Fowler is?
Answer. Yes.
Question. Who is he?
Answer. He's the former Chairman of the DNC.
Question. Let me just show you this letter which is addressed to Don Fowler from Johnny Chung, dated April 5, 1995, and you can quickly go ahead and read that, if you will.
Mr. MCLAUGHLIN. I would note for the record Evan Ryan's name doesn't appear on the document. We haven't been noting Bates numbers in this deposition, but I'll note that it's Number DNC 3102463.

EXAMINATION BY MS. SAFAVIAN:

Question. Are you finished?
Answer. Yes.
Question. Can you tell me what Mr. Chung is asking of Mr. Fowler? I don't want to read the whole thing.
Mr. LAWLER. Right. Have you ever seen it?
The WITNESS. No.
Mr. LAWLER. Then it speaks for itself, right?
Ms. SAFAVIAN. It does.
Mr. LAWLER. Okay.

EXAMINATION BY MS. SAFAVIAN:

Question. Did Mr. Chung ever mention to you that he contacted Mr. Fowler for his assistance in getting these photos?
Answer. No.
Question. Did he ever mention any other individuals' names that he contacted in trying to get these photos?
Answer. No.
Ms. SAFAVIAN. Let's mark this as an exhibit, ER–11.
[Ryan Deposition Exhibit No. ER–11 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. You mentioned that you were aware that the NSC was doing a background check on these individuals?
Answer. Yes.
Question. After you made that first inquiry into the photos, did you make any further ones?
Answer. No, not that I remember.
Question. Did Mr. Chung get in contact with you again about that?
Answer. Apparently. I mean he called on more than one occasion, but I don't remember it specifically.
Question. Do you recall telling Mr. Chung what the status of his photos were?
Answer. Not specifically, no.
Question. Did you later learn about what the NSC, what their background check into these individuals had come up with?
Answer. No, I actually never found out what happened with those photos.
Question. Do you know who Robert Suettinger is?
Answer. I believe he works for the NSC.
Question. Are you aware that there was an April 7, 1995, e-mail from him regarding these individuals in the photo with the President and Johnny Chung?
Answer. I believe I've seen it in another deposition.
Question. Had you seen it prior to the other deposition?
Answer. No.
Question. Were you aware that the NSC considered Chung to be a hustler?
Answer. No.

Question. Are you aware of it now that the memo——

Mr. LAWLER. She was shown the memo during the deposition over on the Senate side.

Ms. SAFAVIAN. Right.

Mr. LAWLER. And she read it and it says what it says.

EXAMINATION BY MS. SAFAVIAN:

Question. Yes. So you are now aware that the NSC considered him a hustler?

Answer. Yes.

Mr. LAWLER. Well, she's aware that the memo says what it says, and whether that can be fairly said that the NSC as a body considered Johnny Chung anything is debatable from my recollection from the terms of the e-mail.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, are you familiar with a charity called Africare?

Answer. No.

Question. Are you familiar with Back to Business Committee?

Answer. I've heard of hit.

Question. And what have you heard about it?

Answer. I know that they tried to, or maybe they did run advertisements urging people get back to the business of government, rather than the focus of Whitewater, et cetera.

Question. Do you know who founded the committee?

Answer. I believe Lynn Cutler did.

Question. Do you know whether Maggie Williams suggested to anyone that they should contribute to the Back to Business Committee?

Answer. No, not to my knowledge.

Question. Do you know if Maggie Williams ever suggested to donors that that was the way to support the First Lady?

Answer. No. Not that I know of.

Question. Do you know if Maggie Williams ever suggested to Cutler individuals she might want to contact to donate to the committee?

Answer. Not that I was aware of, no.

Question. Would you happen to know how Lynn Cutler learned of Johnny Chung?

Answer. No.

Question. Do you know whether or not Johnny Chung donated to the Back to Business Committee?

Answer. I don't know.

Question. Did Mr. Chung ever contact you about Lynn Cutler? Did he ever ask you anything about her?

Answer. Not that I remember, no.

Question. Do you know what the White House data base or WhoDB is?

Answer. Yes.

Question. What is it?

Answer. I believe it's a system set up with people's names who come to events at the White House.

Question. Is that the only reason that it's set on, that you know of?

Answer. That's my understanding.

Question. Did you have access to this data base?

Answer. Yes.

Question. Do you recall when you got access to this?

Answer. No, I don't recall when.

Question. Let me show you this computer service request. Does this refresh your recollection as to when you may have received service?

Answer. Yes, I suppose it would have been late, October '96.

Question. Why did you request that the data base be installed on your computer?

Answer. I didn't request it. I remember that it was assigned to certain people in the office and I was one of the people it was assigned to.

Question. Do you know any reason why it was assigned to different people in the office, including yourself?

Answer. I believe it was assigned to me because I worked for Maggie and as Chief of Staff she would be the person to have access to it, and my recollection is that they gave it to me as well because Maggie would be more likely to have, if she had any need for it, to go through me than to use it herself.

Question. Do you know why in October you would have needed the data base to be installed on your computer and not prior to this date?

Answer. I don't know. As I said, I didn't request it. I just remember that it was assigned to me.

Question. Did you have a security level for using this data base?

Answer. I don't know if it was a requirement or not. There's certain security clearances you have to get in order to be a staff member there, but I don't know if—to be logged on to WhoDB, I don't know if it was necessary to have a certain security level.

Question. Did you have unlimited access to the data base?

Answer. I didn't really use the data base terribly often. I don't know. I don't know.

Question. What would you use it for?

Answer. I used it to get people's addresses normally. People in the office knew I had it. All the photos with Mrs. Clinton from her travels and at events at the White House would come back to our office and so in order to send the photos out, we usually, if we couldn't find people's address or phone number, it was the easiest way to find them.

Question. And you would usually do that at the request of somebody else?

Answer. Yes.

Question. Was there any one person who would normally ask you to conduct those searches?

Answer. No. Generally a lot of interns in the office tried to—it was part of their duties to send the photos out. So if there had been an event at the White House and we had the person's name, we generally had their address and phone number in the WhoDB and that would be how I would be able to send the photos out to them.

Question. Would the interns be able to access the data base?

Answer. No.

Question. Do you have any knowledge of the purpose for which other people in the office would use the data base?

Answer. No, I don't know.

Question. Did you have any discussions with Maggie Williams about the data base?

Answer. No.

Question. Do you know if Ms. Williams ever used the data base?

Answer. Not that I know of. I don't think she did.

Question. Do you know if the First Lady ever used the data base?

Answer. Not that I know of.

Question. Do you have any knowledge of the transfer of data from the data base to any other organization or group that wasn't involved with the White House?

Answer. No.

Ms. SAFAVIAN. If we can just go off the record for a few minutes, I may be close to finishing.

[Off the record.]

Ms. SAFAVIAN. Let me make this computer services request exhibit ER–12.

[Ryan Deposition Exhibit No. ER–12 was marked for identification.]

Mr. LAWLER. That's fine. I would note for the record and there's no disagreement, although you have been asking Evan about the WhoDB element of this document, it is a computer request submitted by, not by Ryan, not by Evan Ryan but by some Van Praagh for a series of computer work, remove IBM hard drive, install 486 hard drive, network computer, install U.S. 2000 load. I don't know what that is. Finally, the fifth element is install WhoDB software.

So just for the context, this looks to be a general request by someone other than Evan to update the computer at her desk rather than any specific request on her part for access to a specific data base.

Ms. SAFAVIAN. Okay. That's fine.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, we did speak briefly just a little while ago about an e-mail from Robert Suettinger and you mentioned that you had seen this before in your Senate deposition. I now have that document and I would like to go ahead and put that in front of you again so we can discuss it.

If you would like, please take a moment to read through that.

Is it your prior testimony that the first time you saw this was in your Senate deposition?

Answer. Yes.

Question. As you can see, the second paragraph of the e-mail says, quote, "Having recently counseled a young intern from the First Lady's office who had been offered

a dream job by Johnny Chung, I think he should be treated with a pinch of suspicion." Do you know who the young intern is that is referenced in this e-mail?

Answer. Yes.

Question. Who is that?

Answer. Gina Ratliffe.

Question. Did you mention her name earlier?

Answer. I may have. I don't know.

Question. In case you hadn't, who is she?

Answer. She was an intern in our office at that time.

Question. And, first of all, how do you know that that is the young intern that is referenced here?

Answer. Because I remember Johnny offering her a job. That's the only intern that I know of that he offered a job.

Question. Do you know what this dream job was that he offered her?

Answer. It was the type of job where she would be his assistant in Washington. She would be based in Washington.

Question. And how did you find out that he offered her this job, was it through Mr. Chung?

Answer. Through Gina Ratliffe.

Question. Through Gina.

Question. And what did Gina tell you about that?

Answer. Just that she had been offered this job by Johnny Chung. And that it sounded great. She was going to be based out of Washington, and she seemed excited about it.

Question. Did she accept the job?

Answer. Yes.

Question. Do you know why Mr. Chung would have offered this job to Gina?

Answer. I think he——

Mr. LAWLER. Do you know?

The WITNESS. I don't know.

EXAMINATION BY MS. SAFAVIAN:

Question. Did he have a lot of contact with Gina?

Answer. He would see her in the office and she's one of the people that would answer the phone. In that respect, yes.

EXAMINATION BY MS. SAFAVIAN:

Question. Did Johnny Chung ever offer you a job?

Answer. No.

Question. Did he ever offer anybody else in the office a job?

Answer. Not to my knowledge.

Question. The e-mail continues: Quote, "My impression is that he's a hustler and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials, end quote."

We talked about this very briefly. When was the first time you learned that the NSC considered Johnny Chung a hustler?

Answer. I believe whenever this came out in the news or when I saw—I don't remember when I saw this.

Mr. MCLAUGHLIN. Your question assumes the NSC considers Johnny Chung to be a hustler. Why don't we just stick to the text of the e-mail. The document speaks for itself. I don't think it indicates what the NSC does and does not think.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, do you know if the First Lady's Office was ever made aware of this e-mail?

Answer. I don't know.

Question. So you don't know if it was ever sent over to the First Lady's Office?

Answer. I don't know.

Question. Real quickly, you mentioned that Gina accepted the job with Johnny Chung?

Answer. Yes.

Question. Do you know for how long she worked for him?

Answer. No. I believe it was a matter of months, but I don't know how long.

Question. Did you keep in contact with her after she left and started working with him?

Answer. Yes, somewhat.

Question. Did you ever ask her how her new job was; did she ever tell you anything about Johnny Chung?

Answer. She was not happy in her new job. She initially may have been, but eventually was not happy because she wasn't being paid as she had been promised.

Question. It was less salary than she was promised?

Answer. Or I think had not been paid for an extended period of time.

Question. Did she say anything else to you?

Answer. She was upset about that, and I think she, you know, therefore was going to leave the job.

Question. Did she leave?

Answer. Yes.

Question. Can you put a time frame on that at all as to how long she was with him?

Answer. Maybe 4 months. I can't say specifically, but that's my——

Question. Do you know what she did for him?

Answer. She was based in Washington. She was in charge of setting up reservations at restaurants for dinner—this is what she told me, I don't know for a fact—checking out museum exhibits that might be interesting to the visiting guests. It was something along those lines.

Question. Do you know where she is now?

Answer. She left Washington, I think, about a year ago, because I remember there was a going away party for her, and it was sometime late last summer.

Question. Do you know how much she was promised for her salary?

Answer. I don't know the amount, no.

Ms. SAFAVIAN. I will make the e-mail from Robert Suettinger ER–13.

[Ryan Deposition Exhibit No. ER–13 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, what I would like us to do very quickly, these are WAVE records of Johnny Chung.

Mr. LAWLER. There are different than the ones we already looked at?

Ms. SAFAVIAN. Well, no, I gave you '95? That is another copy. Stick with what I have in front of you so we do not get confused. They are separated by '94, '95 and '96.

Mr. LAWLER. Since we talked about that one, can we mark that as an exhibit?

Ms. SAFAVIAN. Sure, I will just put this one away.

EXAMINATION BY MS. SAFAVIAN:

Question. What I want to do is go very quickly through some of these from the times when Johnny Chung was waved into the White House, and I would like to know if you happen to know who the names are on the WAVE records; who was requesting and who he was meeting with, and, if you happen to know, any of the circumstances of the meetings.

We can start with the first page, which shows——

Mr. MCLAUGHLIN. Which EOP page?

Ms. SAFAVIAN. Starting with 008708.

EXAMINATION BY MS. SAFAVIAN:

Question. The date on the first one is February 2nd, 1994. It shows that it was requested by somebody named Botwin, B-O-T-W-I-N, and was visiting with someone named Foucart, F-O-U-C-A-R-T.

Do you know who either of those individuals are?

Answer. I don't, no.

Question. The next EOP is 008700, which shows a date of July 22nd, 1994, requested by and visiting with Anderson.

Do you know who that is?

Answer. No, I don't.

Question. Would you happen to know anything about this meeting?

Answer. No.

Question. The next one is EOP 08698, and we have a couple on this page. We can start with the first one at the top. It's August 2nd, 1994 is the date, and the visitor, and is requested by somebody named Lewis.

Do you know who that is?

Answer. I don't.

Question. The next entry is August 4th, 1994, Anderson?

Answer. No.

Question. The next one is August 8, 1994. We show it's requested by somebody named Dickey, and the visitor is POTUS, which is the President of the United States.

Do you know who Dickey is?

Answer. Robin Dickey. Or at that time it was someone by the name of Helen Dickey. They both worked in the social office.

Question. Do you have any reason to know why Johnny Chung would be meeting with the President on the South Lawn on that day?

Answer. It must have been an event. They only have events on the South Lawn.

Question. The next one is August 8th, 1994, requested by somebody named Atta, A-T-T-A.

Do you know who that is?

Answer. No.

Question. Once again, we have Lewis, and you don't know who that is?

Answer. No.

Question. The next one is August 11th, '94. Once again that's Anderson?

Answer. No.

Question. And then August 12th, '94 is Anderson and Lewis, and you don't know who they are?

Answer. No.

Question. The next one is EOP 003738. The date is September 20th, 1994.

Once again it is requested by Lewis, and Lewis is the visitee?

Answer. No.

Question. September 21st, '94. This time it is requested by somebody named Kelly.

Do you know who that is?

Answer. No.

Question. And the visitee is Quinn.

Do you know who that is?

Answer. I believe that's Jack Quinn.

Question. Do you have any reason to know why Johnny Chung would be meeting with Mr. Quinn?

Answer. No.

Question. The next date is September 23rd, '94.

Once again Lewis is the name?

Answer. No.

Question. The next page is EOP 008694. The date is October 5th, '94. Requested and visitee by somebody named Shakow, S-H-A-K-O-W.

Do you know who that individual is?

Answer. No.

Question. And then again at the bottom there's a date of October 20th, '94, and that's Anderson again.

Mr. LAWLER. And you still don't know Anderson.

The WITNESS. No.

EXAMINATION BY MS. SAFAVIAN:

Question. No. The next page is EOP 005041. The date is November 1st, 1994. Johnny Chung's appearance was requested, and he was visiting with somebody named Eder, E-D-E-R.

Do you know who that is?

Answer. No.

Question. The last entry on that page is November 29th, 1994. The requester was somebody named—I'm not sure how to pronounce that—W-O-Z-N-I-A-K.

Do you know who that is?

Answer. No.

Question. And visitee being Mitchell.

Do you know who that would be?

Answer. No.

Question. The last one in '94 is EOP 005040. We have a date of December 19th, 1994. It looks like the requester was Dunn.

Is that what that looks like to you?

Answer. Yes.

Question. Do you know who that is?

Answer. Donald Dunn.

Question. Who is Donald Dunn?

Answer. I believe he worked in political affairs at the time.

Question. And the visitee is Lewis?

Answer. I don't know.

Question. The next one is December. Again we have December 19th, '94. This time the requester is Anderson, and he's visiting with Anderson?

Answer. No.

Question. We have another entry with Dunn on December 27, perhaps, hard to read.

Would you have any reason to know why Dunn would be meeting with Johnny Chung?

Answer. No.

Question. The next one is December 10th of '94.

Do you know who Brown is?

Answer. No.

Question. And the last one on that page is December 20th of 1994. The requester is Burke.

Do you know who that is?

Answer. No.

Question. Do you have any reason to know why Johnny Chung would be meeting with the President on that day?

Answer. I don't, but I see that it's Christmastime, so I'm guessing it was a Christmas event.

Question. Let's move on to 1995. EOP 005039. Once again on January 11th, '95, the requester and the visitee is Dunn.

Do you have any reason to know why Dunn would be meeting with Johnny Chung on that date?

Answer. No.

Question. The next one is January 13th, '95. It appears that Johnny Chung is meeting with Middleton.

Do you know why he would be meeting with Middleton?

Answer. No.

Question. We have a January 30th, '95, again Dunn.

Any reason for that visit?

Answer. I don't know.

Question. January 10th, 1995, the requester and the visitee is Frankfurter.

Do you know who that is?

Answer. No, I don't.

Question. Then we have January 12th, '95, the requester and the visitee is Middleton.

Do you know why he would be meeting with Middleton?

Answer. No, I don't.

Question. The next page is EOP 008683. We have a couple entries on this page where your name is mentioned. We have already talked about the March 8 and March 9.

Examination by looking at this and seeing the dates that you requested Johnny Chung be admitted, do you have any recollection as to why you requested him be admitted on these dates besides March 8 and March 9?

Answer. No. I think I stated before that Johnny Chung would stop by or call to be cleared in just to visit and just to talk. I have no specific recollection of a date and a specific reason that he stopped by the office.

Question. Speaking about that, can you tell me, could anybody just stop by in the lobby and ask to be waved in?

Answer. It's possible, yes.

Question. And there would be no problem with that?

Answer. I knew Johnny Chung. I had been made aware of who he was. I had met him, so I definitely knew who he was. No one else really does that. If anyone else wants to try, but——

Question. At the bottom there is a March 10, '95 date, and the visitor and the requester is Tarmey.

Who is Tarmey?

Answer. Marge Tarmey, who was the assistant to the chief of staff at the time.

Question. Let's turn to page EOP 005038. The date is March 11th, 1995. This time the requester is somebody named Crawford.

Do you know who that is?

Answer. I believe that's Kelly Crawford.

Question. And who is she?

Answer. She worked in Oval Office operations.

Question. Do you know why Johnny Chung would be meeting with the President of the United States on that date?

Answer. I believe that's the radio address.

Question. Oh. The next page is EOP 008680. On May 19, 1995, Shulman has requested Johnny Chung.

Who is Shulman?

Answer. I don't know.

Question. The visitee is Matsui.

Do you know who that is?

Answer. Doris Matsui.

Question. Do you have any reason to know why Mr. Chung would be meeting with Ms. Matsui?

Answer. No.

Question. And there's another date there with your name.

Do you know why he would you would have waved him in on May 4, '95?

Answer. No.

Question. The page is EOP 003717. Once again we have three entries, May 3, May 19 and May 24th, and they all have your name.

Do you have any recollection as to these visits?

Answer. No.

Question. The next page is EOP 003713. We have three entries again, July 10th, July 11th and July 21st. Your name is on this.

Do you recall the circumstances of these visits?

Answer. No.

Question. Do you know why he would have visited on the 10th and then the 11th?

Answer. No.

Question. The next page is EOP 005035.

The requester is Widdess?

Answer. Yes.

Question. Do you know who that is?

Answer. Yes.

Question. Who is that?

Answer. Kim Widdess.

Question. And who is she?

Answer. She worked in the Social Office.

Question. Do you know why Mr. Chung would be meeting with the President of the United States on July 11th?

Answer. All I know is that Kim Widdess' job was guest lists. She cleared everyone in for any events at the White House.

Mr. LAWLER. And again Evan doesn't know whether he meets with the President. Again, it is a fair question, but it is somewhat misleading as well because she doesn't know whether he was meeting with the President or in a room with 500 other people.

Ms. SAFAVIAN. Sure.

EXAMINATION BY MS. SAFAVIAN:

Question. I'm asking for what you may know.

Answer. Any time Kim Widdess has cleared someone in, it usually means it is an event with a big group of people. That's her job, and it says "state floor," so I would assume it's an event on the state floor.

Mr. LAWLER. But my point is the visitee column is not, I don't think, fairly equivalent, as far as she knows, and her testimony has also been, equivalent to a meeting with, a substantive meeting, with the person there.

EXAMINATION BY MS. SAFAVIAN:

Question. The page is EOP 003710. We have three visits;, looks like two visits on September 25th and one on September 26th, and your name is on all those with the exception of one time on the 25th when McCoy's name is mentioned.

Do you happen to recall any of these, the circumstance of any of these visits?

Answer. If I cleared him in, and the visitee was Ann McCoy, that meant she worked in the Visitors Office, so she was probably giving a tour for him.

Question. Is that all you recall about those dates?

Answer. Yes.

Question. Let me hand you another telephone message. It's dated September 27th or 29th, it's hard to read, but it is of 1995, and it is from Johnny Chung. It's addressed to you. The message says he is sending two baskets of flowers, one for Maggie, one for you.

Answer. Yes.

Question. Did Johnny Chung send you and Maggie Williams flowers?

Answer. I don't recall specifically, but he must have.

Question. Did he often send you flowers? Did he ever send you flowers?

Answer. I don't remember it specifically, but I don't know. I mean, if he said he was, maybe he did.

Question. Do you know why he would send you flowers?

Answer. No.

Ms. SAFAVIAN. I would like to make this an exhibit, ER dash 14.

[Ryan Deposition Exhibit No. ER–14 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Turning to the next page, EOP 005032, Johnny Chung, we have dates of 10/16—I'm sorry, October 16, 19, 26th and 28th of 1995. Besides your name, we have Philips as a requester for October 26th.

Who is Philips?

Answer. I don't know.

Question. Who is Brown? That's the requester for October 28th.

Answer. I don't know.

Question. Do you happen to recall the circumstances surrounding the visits on October 16th or 19th?

Answer. No.

Question. Let me hand you another telephone message. This one is dated October 19th, 1995. I'm sorry, October 20th, the day after one of his visits, which was October 19th. Once again it states that he is sending flowers to you and Maggie.

Do you recall him sending flowers on this date?

Answer. No. No, I don't.

Ms. SAFAVIAN. Let me mark that as Exhibit ER dash 15.

[Ryan Deposition Exhibit No. ER–15 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:.

Question. And then the last page of '95 is EOP 003703. The date is December 8th, 1995. The visitee is McCoy.

Do you know why he would be there on that day?

Answer. As I said, Ann McCoy works in the Visitors Office, and I know she had given him tours before, so that would be——

Question. Do you know if that's the date of the Christmas party at the White House?

Answer. I don't know.

Question. Okay. Then we just have two entries in '96. EOP 008663, February 9th, 1996. The visitee is once again you.

Do you recall the circumstance of this meeting?

Answer. I don't, no.

Question. And then the last one is EOP 005029, and the date of that is June 15th, 1996. The requester and the visitee is listed as Forster.

Who is Forster?

Answer. I don't know.

Ms. SAFAVIAN. I will mark all of these WAVE records as Exhibit ER–16 for all 3 years.

[Ryan Deposition Exhibit No. ER–16 was marked for identification.]

Mr. LAWLER. And the part of Exhibit 16 that covers '95 is the WAVE records we talked about earlier in the deposition.

Ms. SAFAVIAN. From March 8 and March 9.

EXAMINATION BY MS. SAFAVIAN:

Question. Just to summarize our discussion about Johnny Chung, besides what we have already discussed, do you recall any of the topics or discussions with Johnny Chung that you may have had?

Answer. No.

Question. Do you recall any discussions you may have had with anybody else in the First Lady's office about Johnny Chung besides the ones we already discussed?

Answer. No, not that I recall. No.

Question. Have you had any discussions with anyone else in the First Lady's office since Johnny Chung has given his account of the March 8th and March 9th, 1995 visits in the news accounts to Tom Brokaw last night? Have you spoken with anybody else in the First Lady's office since that has been made public?

Answer. No.

Mr. LAWLER. And again, that is on advice of counsel.

Ms. SAFAVIAN. Ms. Ryan, I believe I'm done. At this time Minority counsel probably has a few questions to ask you.

Mr. MCLAUGHLIN. I will try to keep them very brief because I know you are anxious to get out.

Mr. LAWLER. A sentiment shared by other people in the room.

Mr. MCLAUGHLIN. Shared by me.

EXAMINATION BY MR. MCLAUGHLIN:

Question. I will show you a document. Majority counsel doesn't seem to be particularly interested in letting you address each of the allegations that Johnny Chung has made in the L.A. Times story, so I want to go through it now.

Do you recognize——

Ms. SAFAVIAN. Objection. That is an inaccurate portrayal of the testimony we have had here today.

Mr. MCLAUGHLIN. Are you directing the witness not to answer?

Ms. SAFAVIAN. I'm objecting to your portrayal of my questions.

Mr. MCLAUGHLIN. I will actually be happy to respond to your questions in saying that I don't believe that you gave her a fair opportunity to respond to each of the allegations in this article. We are now going to go through some of the ones you missed.

And I apologize in advance if I am a little repetitive. We might hit one or two things you already addressed. We will try to skip those.

EXAMINATION BY MR. MCLAUGHLIN:

Question. Do you recognize what I have just put in front of you?

Answer. Yes.

Question. What does the document appear to be?

Answer. It's an article from the Los Angeles Times, July 27th, 1997.

Question. And you have seen this article before?

Answer. Yes.

Question. I'm going to—rather than go through in it in any kind of detail, I'm going to skip ahead. If you can turn to the fourth page, the beginning sentence on that page is, "And in the First Lady's office." The second paragraph reads, "Here is Chung's version of those disputed events." The first sentence refers to that March day, which I believe is Chung's first visit that has been the subject of our discussions here.

Is it your belief that that was March 8th, 1995?

Answer. Yes.

Question. The first sentence reads, "Chung was greeted by Ryan, who was then a staff assistant."

To the best of your recollection, is that sentence accurate?

Answer. Yes.

Question. Second sentence: "He showed her the business cards of his Chinese companions and asked if arrangements could be made for them to eat lunch in the White House Mess and meet Hillary Clinton."

To the best of your recollection, are all of the elements of that sentence correct?

Answer. No.

Question. Which ones are incorrect?

Answer. He never showed me business cards on that day, and he also asked about the radio address and a tour of the White House.

Question. "Chung also asked if there was anything he could do to help the White House."

Is that sentence correct?

Answer. No.

Question. And how is it incorrect?

Answer. That day he stated he was making a contribution to the DNC.

Question. Next paragraph. "Ryan left for about 15 to 20 minutes and returned, saying he had spoken with Williams"—"she had spoken with Williams."

Is that sentence correct?

Answer. Yes.

Question. Then she said, quote, "Maybe you can help us," unquote.

Is that sentence correct?

Answer. No.

Question. How is that incorrect?

Answer. I didn't say anything about helping us. I mentioned that we were going to check and see if we could set up any of the things he was hoping to set up.

Question. The next paragraph reads, "The aide told Chung that," quote, "the First Lady had some debts with the DNC," unquote, "from expenses associated with White House Christmas parties."

Is that sentence correct?

Answer. No.

Question. And how is it incorrect?

Answer. I never discussed expenses and that Christmas with Mr. Chung.

Question. The next sentence reads, "Chung believes that Ryan mentioned a figure of around $80,000."

Is that sentence correct?

Answer. No.

Question. How is that incorrect?

Answer. I never mentioned a figure of $80,000. I never mentioned any money.

Question. Skip the next paragraph because it is a parenthetical not bearing on facts.

Sentence—paragraph following that reads, "Ryan told him, Chung said, that she was relaying the request on behalf of Williams, who hoped Chung could," quote, "help the First Lady," unquote, "defray those costs."

Is that sentence correct?

Answer. No.

Question. And how is it incorrect?

Answer. I was not relaying anything on behalf of Maggie Williams regarding defraying costs for the First Lady.

Question. We will skip the next paragraph.

Paragraph after that begins, "After making that commitment, Chung said"—did you regard him—is it your belief that he made a commitment to you at that meeting?

Answer. No. It was left in terms of we would be talking later that day about setting up the different requests he had made.

Question. Okay. The next paragraph begins, "The next morning."

Is it your belief the next morning would be March 9, 1995?

Answer. Yes.

Question. The sentence states, "The next morning, Chung said, he went back to the White House and was escorted to Ryan's desk in the reception area of the First Lady's office."

Is that sentence correct?

Answer. I don't remember when he came. He came around lunchtime the next day, and he and the group came to the office the next day.

Question. "He said he gave her an unsealed envelope."

Is that sentence correct?

Answer. No.

Question. And how is it incorrect?

Answer. He didn't give me an envelope. Never gave me an envelope.

Question. The next paragraph reads, "According to Chung, Ryan lifted the flap and examined the contents."

Is that sentence correct?

Answer. No.

Question. How is it incorrect?

Answer. I didn't lift the flap, I never had the envelope, and I didn't examine the contents.

Question. The sentence reads, "Inside was his check and a note to Williams, which he recalled said something like: To Maggie—I do my best to help. Johnny Chung," unquote.

Do you have any knowledge as to whether that sentence is correct or not?

Answer. No, I don't know.

Question. The paragraph begins, "A short time later, Chung said, the chief of staff joined them, and Ryan handed the envelope to her."

Is that sentence correct?

Answer. No.

Question. How is it incorrect?

Answer. Johnny Chung handed the envelope to Maggie Williams directly himself.

Question. Next sentence reads, Williams, he said, immediately led him to a private office and called to reserve a table for the Chinese delegation at the White House Mess.

Is that sentence correct?

Answer. No.

Question. How is it incorrect?

Answer. At that point, by the time he handed the envelope to Ms. Williams, he had already had lunch at the Mess.

Question. The next three paragraphs we will skip because they don't allege facts that concern you.

The paragraph following begins, "Later, waiting for Hillary Clinton in a White House reception room, Chung said he asked if the First Lady had been informed of his donation, and Ryan responded," quote, "yes, she definitely knows," unquote.

Is that sentence correct?

Answer. No, he never asked me that. I never said yes, she definitely knew.

Question. Turning to the next page that begins with the phrase, "Shortly before 4:00 p.m." I would like to direct your attention to the fourth paragraph down that begins, "But they agree." And I believe "they" in that paragraph refers to White House officials, which begins the prior paragraph. The second sentence of that paragraph reads, "They maintain that Williams and Ryan did not solicit the donation and did not provide any benefits as a result of it."

Is that sentence correct?

Answer. Yes.

Question. Let me just ask you a more general question based on that point. Did you ever take any actions in your capacity working in the First Lady's office that were connected to, in response to, or designed to encourage political or other kinds of campaign contributions?

Answer. No.

Question. Let's turn to the next paragraph. It says—and I believe this is quoting Anne Lewis, who is the White House communications director—quote, "Maggie Williams recalls that, on several occasions, Johnny Chung told her that he wanted to make a personal contribution to the Clintons," unquote. Lewis said, quote, "She told him that he could not make a personal contribution. She eventually told him he could give to other entities, such as the Democratic National Committee," unquote.

Do you have any anything in your personal knowledge as to whether or not those statements are true?

Answer. Whether or not Maggie Williams told Johnny Chung that?

Question. Exactly, the statements, the facts that are set forth in Ms. Lewis's account?

Answer. I myself wasn't present. No, I don't remember it specifically.

Question. The next paragraph reads, "Lewis said Chung was told the First Lady's office could not arrange his attendance at the President's radio address."

Is that statement correct to the best of your knowledge?

Answer. I don't remember much of the radio address or dealing with it, so I don't know what he was told.

Question. We have already covered that. I apologize for bringing it up again.

The next sentence reads, "And, Lewis said, Ryan" quote, "is sure that she had no discussion of financial contributions with Johnny Chung," unquote.

Is that sentence correct?

Answer. Yes, and no discussions he made that statement to me, but there were never any discussions.

Question. Let me direct your attention to the next page. This page begins with the phrase, "Williams, who has served Hillary Clinton." I would like to point you to the sixth paragraph down. It begins, "On Friday." On Friday; do you believe that that refers to March 10th, 1995?

Answer. Yes.

Question. Sentence reads, "On Friday, Chung returned to the White House, was admitted into the compound by the First Lady's office, and repeated his request to Ryan."

Is that sentence correct?

Answer. No, it's not. I was not around on Friday, March 10th. I was in New York.

Question. You were in New York. And you have already represented that you were anxious to leave the day before?

Answer. Yes.

Question. And is it the case you wanted to get to New York to be at a basketball tournament your brother was in?

Answer. Yes.

Question. I would like to turn briefly back to one of the exhibits you were just shown, Exhibit 16, and this would be the WAVE summaries for 1995, and the second page of that group, which is Bates stamped EOP 008683.

The third line up from the bottom shows a visit from Johnny Chung, and the requester requested by category then a visitor are both Tarmey. They are not Ryan. So this document is consistent with your recollection that you were not present there on Friday; is that correct?

Answer. Yes.

Question. So this account confirms that Johnny Chung was not telling the truth when he said that he met with you on Friday, March 10th?

Answer. Yes.

Question. I would now like to ask you——

Ms. SAFAVIAN. Counsel, are we going to make this an exhibit?

Mr. MCLAUGHLIN. I don't have exhibit stamps. If I could use one of yours?

Ms. SAFAVIAN. Sure. The next one is ER dash 17. So we will make this ER–17. Thank you.

[Ryan Deposition Exhibit No. ER–17 was marked for identification.].

Mr. LAWLER. If that is not cooperation, I don't know what is.

EXAMINATION BY MR. MCLAUGHLIN:

Question. Next, I would like to ask you some questions that Mr. Condit, who is a Member of the committee, has asked that we ask witnesses concerning the burden of the investigation.

Have you been asked by any other official investigative body to testify or provide evidence on any of the fund-raising or other matters being investigated by this committee?

Answer. Yes.

Question. And before what body was that?

Answer. The Senate.

Question. Have you provided documents to, been interviewed by, or been involved in a deposition by the Senate?

Answer. Yes.

Question. Is it fair to say that the matters that were covered in today's deposition were all, or substantially all, matters that were also covered in the Senate deposition?

Answer. Yes.

Question. Would it be fair to say that had this committee reviewed the Senate deposition, relied on the testimony you gave there, that we could have avoided much of the time that was spent in today's deposition?

Answer. Yes.

Question. Have you received any requests to provide documents, be interviewed or be deposed in the future by any other investigative body?

Answer. No.

Question. Can you estimate how much of your time you have spent in responding to requests from this committee for testimony, information or documents?

And maybe we can divide that into two categories. One would be if you can estimate how much of your time that you spent in the First Lady's office working in response to requests of the Executive Office of the President, and maybe how much of your time you spent on your own preparing for this deposition today. Estimates will be fine.

Answer. In the First Lady's office dealing with this document request on this?

Question. Exactly, from this committee.

Mr. LAWLER. Can you do that?

The WITNESS. Not really.

EXAMINATION BY MR. MCLAUGHLIN:

Question. Can you give a figure for all of them put together?

Answer. All of?

Question. Are we talking weeks, days?

Answer. Are you talking about this investigation?

Question. I'm sorry, the Senate and House investigations put together and any other subpoenas you have spent time responding to.

Mr. LAWLER. Can you do that?

The WITNESS. Not really.

EXAMINATION BY MR. MCLAUGHLIN:

Question. Okay we will move on.

Can you estimate any time you have spent other than in your official capacity preparing for this deposition?

Answer. I don't know. Bill may have a better idea.

Mr. LAWLER. A substantial number of hours.

EXAMINATION BY MR. MCLAUGHLIN:

Question. Have you taken time from your job to respond to this committee's request?

Answer. Yes.

Question. Have you incurred expenses in responding to the demands from this committee?

Answer. Mr. LAWLER. I paid for the cab on the way over.

Mr. MCLAUGHLIN. That's all the questions that I have.

Mr. LAWLER. Can we go off the record for one second?

Mr. MCLAUGHLIN. Sure.

[Discussion off the record.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, I just have maybe two final questions. Really, just two.

Mr. LAWLER. I'm going to count. Got to be careful about promising two questions. They may have subparts.

Ms. SAFAVIAN. That's right.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ryan, Mr. McLaughlin just went over and quoted from the Los Angeles Times article, and I will not requote that. But I'm just referencing that. Some of the quotes that were read into the record were actually quotes from Anne Lewis; do you recall that?

Answer. Yes.

Question. Who is Anne Lewis?

Answer. She's the White House communications director.

Question. Do you know if she was ever involved in the Back to Business Committee?

Answer. I don't know. I'm not sure. She could be. I don't know.

Mr. MCLAUGHLIN. Are you speculating?

The WITNESS. Yes, I'm speculating. I'm only saying that because she started the White House recently.

EXAMINATION BY MS. SAFAVIAN:

Question. She started at the White House recently?

Answer. Yes.

Question. Do you know when?

Answer. Around Inauguration.

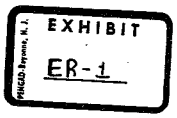
Question. Okay. And then one final question. Are you aware that Johnny Chung contributed $25,000 to the Back to Business Committee?

Answer. No.

Ms. SAFAVIAN. That's all I have. Thank you very much for your time today.

[Whereupon, at 6:20 p.m., the deposition concluded.]

[The exhibits referred to follow:]



RECORD TYPE: PRESIDENTIAL (ALL-IN-1 MAIL)

CREATOR:Evan M. Ryan (RYAN_E) (WHO)

CREATION DATE/TIME: 9-MAY-1996 11:50:11.27

SUBJECT:Call List additions

TO:Peggy A. Lewis (LEWIS_P) (WHO)
READ: 9-MAY-1996 12:27:35.36

TEXT:
Maggie wanted to add John Huang to her call list - 863-7178
He's from the DNC
Is Chuck Supple still on that list 638-3300?

COMMITTEE ACCESS

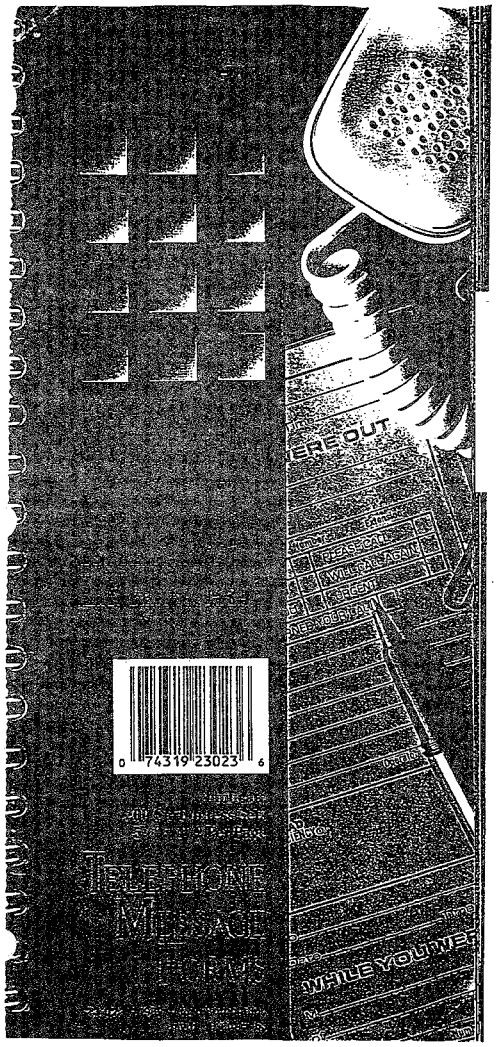


EXHIBIT
ER-2

COPY
from ORM
5618

EOP 059044

To: Bill Maguire

Date: 5/22 Time: 6:45

WHILE YOU WERE OUT

M: Adam

of: Leon Panetta

Phone: 6-6797

Area Code | Number | Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

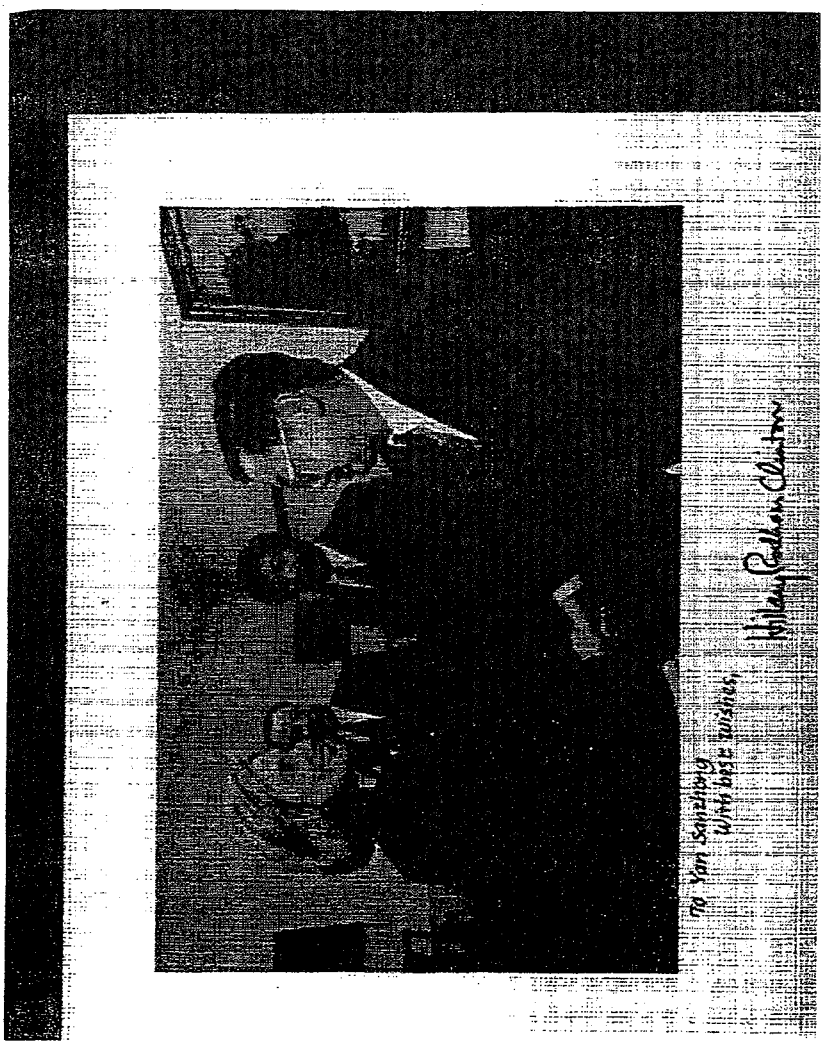
Message: Mtg. 2:00-2:30 Wed 5/24
COS office re: DNC
employees working at WH.

Operator: [illegible]

AMPAD EFFICIENCY® 23-023 CARBONLESS

EOP 059045

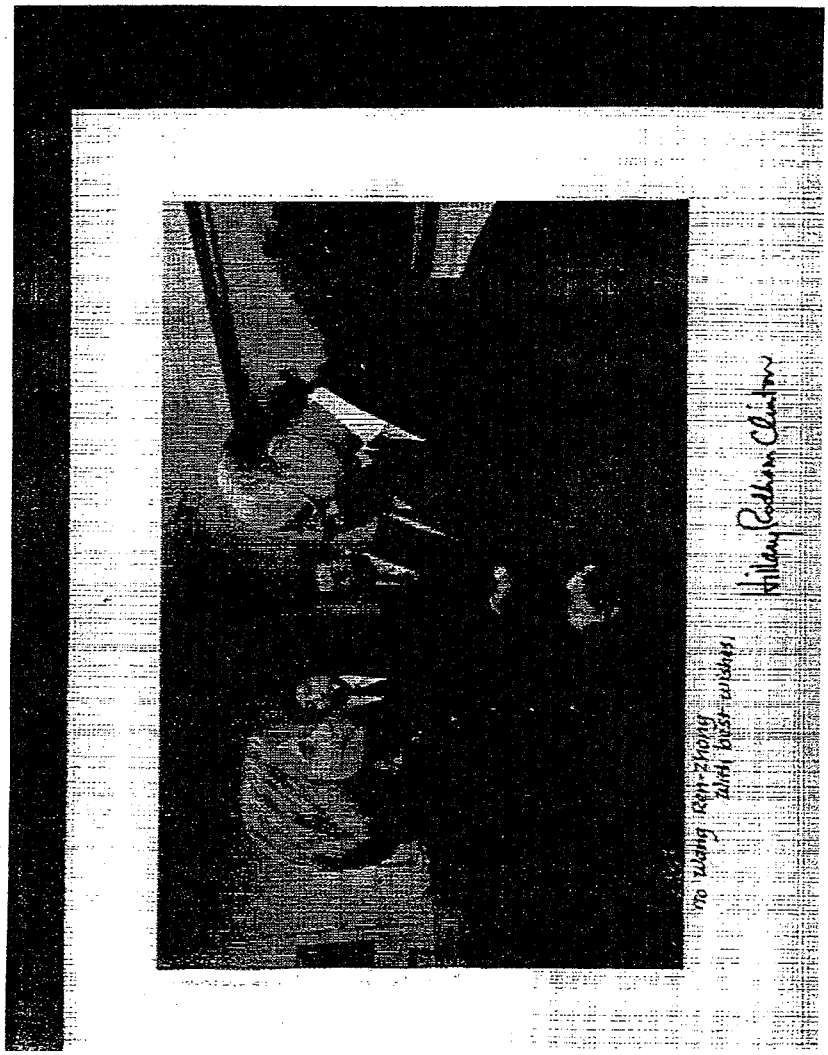
EXHIBIT
ER-3



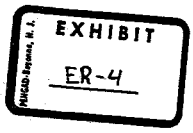
Hillary Rodham Clinton

70 Yale Sterling
White House Fellows

To Huang Jichun
with best wishes.
Hillary Rodham Clinton



Hillary Rodham Clinton
Rt. Hon. Tony Blair
Lunch-time press conference



Memorandum

May 5, 1994

TO: Ann Cahill

FR: Martha Phipps

RE: WHITE HOUSE ACTIVITIES

In order to reach our very aggressive goal of $40 million this year, it would be very helpful if we could coordinate the following activities between the White House and the Democratic National Committee.

1. Two reserved seats on Air Force I and II trips
   Contact: Ricki Seidman/Mike Lufanio

2. Six seats at all White House private dinners
   Contact: Ann Stock

3. Six to eight spots at all White House events (i.e. Jazz Fest, Rose Garden ceremonies, official visits)
   Contact: Ann Stock

4. Invitations to participate in official delegation trips abroad
   Contact: Alexis Herman

5. Better coordination on appointments to Boards & Commissions

6. White House mess privileges
   Contact: Patsy Thomason

7. White House residence visits and overnight stays
   Contact: Ann Stock

8. Guaranteed Kennedy Center Tickets (at least one month in advance)
   Contact: Ann Stock

9. Six radio address spots
   Contact: David Levy

10. Photo opportunities with the principles

11. Two places per week at the Presidential CEO lunches
    Contact: Alexis Herman

12. Phone time from the Vice President
    Contact: Jack Quinn

13. Ten places per month at White House film showings
    Contact: Ann Stock

14. One lunch with Mack McLarty per month
    Contact: Mark Middleton

15. One lunch with Ira Magaziner per month
    Contact: Marge Tarmey

16. One lunch with the First Lady per month
    Contact: Maggie Williams

17. Use of the President's Box at the Warner Theater and at Wolf Trap.
    Contact: Ann Stock

18. Ability to reserve time on the White House tennis courts

19. Meeting time with Vice President Gore
    Contact: Jack Quinn

RUN DATE : 95/05/01

VISITOR SUMMARY FOR 95/04

VISITOR			VISITEE			VIN	TIME	DATE	LOC	ROOM	REQUESTOR	BADGE	TOA	POA
[illegible]			[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
MIDDLETON	MARK		KHAPRA			U54709	1300	950421	W	WW	KHAPRA	Y ******	****	***
MIDDLETON	MARK		KHAPRA			U55898	0915	950425	W	WW	KHAPRA	Y 168524	0956	A04
MIDDLETON	MARK		HCLARTY	III		U57020	1430	950427	W	GPL/WW	VARNEY	M 643649	1422	A04
[illegible]			[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
MIDDLETON	MARK		RYAN			U54764	1310	950421	O	100	RYAN	E ******	****	***

EXHIBIT
ER-5

COMMITTEE ACCESS

EOP 020376

REPORT NO: WAV077D5 WAVES PAGE NO: 436

RUN DATE : 95/06/01 VISITOR SUMMARY FOR 93/05

VISITOR		VISITEE		VIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TOA	POA
MIDDLETON	MARK	SMITH		U59265	1530	950502	O	156	SMITH		******	****	***
MIDDLETON	MARK	KHAPRA		U59333	1730	950502	W	WW	KHAPRA	Y	******	****	***
MIDDLETON	MARK	MCLARTY		U60180	1000	950504	W	WW	VARNEY	M	998797	1008	A04
MIDDLETON	MARK	MCLARTY	III	U61727	1830	950508	W	GFL/WW	VARNEY	M	665636	1845	B04
MIDDLETON	MARK	WILLIAMS		U51770	1030	950509	O	100	RYAN	E	3	1030	A04
MIDDLETON	MARK	KHAPRA		U66397	1200	950516	W	WWA	KHAPRA	Y	535635	1204	A04
MIDDLETON	MARK	WILLIAMS		U68176	1315	950519	W	2FL/WW	RYAN	E	5	1309	A04
MIDDLETON	MARK	CRAWFORD		U68809	0830	950520	W	IPL/WW	KHAPRA	Y	243631	0907	B04
MIDDLETON	MARK	KHAPRA		U69311	1030	950530	W	WW	KHAPRA	Y	466436	1006	A04
MIDDLETON	MARK	CARR		U70396	1000	950[illegible]	O	2118	CARR	K	******	****	***

WAVES

VISITOR SUMMARY FOR 95/03

	VISITEE		TIME	DATE	LOC	ROOM	REQUESTOR	BADGE	TOA	POA
[redacted]										
[redacted]	KHAFRA		0864	1200	950319	W	OW	KHAFRA		
[redacted]	WILLIAMS		0883	1315	950519	W	2FL/OW	RYAN		1305 A04

EOP 056855

REPORT NO: WAV077DS WAVES PAGE NO: 415

RUN DATE: 95/07/03 VISITOR SUMMARY FOR 95/06

VISITOR		VISITEE		UIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TOA	POA
MIDDLETON	MARK	WILLIAMS		U72049	1100	950609	O	100	RYAN	E	634634	1101	B04
MIDDLETON	MARK	KHAPRA		U78662	0948	950613	W	WW	KHAPRA	Y	436436	0939	A04
MIDDLETON	MARK	WILLIAMS		U78860	1330	950620	W	2FL/WW	RYAN	E	543654	1326	A04
MIDDLETON	MARK	WILLIAMS		U82233	1700	950629	O	100	RYAN	E	348416	[illegible]	[illegible]

EOP 020378

RUN DATE 95/08/01 1 -- VISITOR SUMMARY FOR 95/07 -----

VISITOR		VISITEE	UIN	TIME	DATE	LOC	ROOM	REQUESTOR	BADGE	IOA	POA
MIDDLETON								DAWSON		*****	
MIDDLETON	MARK	WILLIAMS	U90780	0800	950721	W	[illegible]	RYAN	34E3DC	0749	804
MIDDLETON	MARK	CAMERON	U91363	0900	950722	W	WW	CAMERON	R 34D910	0929	D04
MIDDLETON	MARK	KHAPRA	U91838	1500	950724	D	174	KHAPRA	34D620	1536	D01
MIDDLETON	MARK	KHAPRA	U92294	1600	950726	D	174	KHAPRA	Y 34D734	1615	D01
MIDDLETON	MARK	MATSUI	U92827	1400	950727	D	[illegible]	KHAPRA	Y ******	****	***
MIDDLETON	MARK	MATSUI	U92971	1400	950727	D	[illegible]	EDER	A 34DA0A	1401	D01
MIDDLETON	MARK	SCOTT	U93823	1600	950727	D	[illegible]	FLYNN	T ******	****	***
MIDDLETON	MARK	HEISTAD	U93917	0900	950728	D	149	FLYNN	T ******	****	***
MIDDLETON	MARK	HEISTAD	U94074	1100	950728	D	149	HEISTAD	34D995	1141	D02

RUN DATE 95/10/02 VISITOR SUMMARY FOR 95/09

			VIN	TIME	DATE	LOC	ROOM	REQUESTED	NAME				
MIDDLETON	MARK	WILLIAMS	U09130	1315	950912	W	WW	RYAN	E	34BFA6	1244	A04
MIDDLETON	MARK	DOWLES	U08793	1200	950913	W	WW	MADARIS	P	******	****	***
MIDDLETON	MARK	EMERSON	U09875	1700	950913	D	106	WILLIAMS		34C3A6	1700	A04
MIDDLETON	MARK	KHAPRA	U09929	1700	950913	W	WW	KHAPRA	Y	******	****	***
MIDDLETON	MARK	MCCARTY	U09935	0930	950914	W	WW	KHAPRA	Y	34D614	0921	A04
MIDDLETON	MARK	SCHIFF	U10296	1200	950914	W	WW	SCHIFF		34C3EF	1140	A04
MIDDLETON	MARK	CAREY	U10724	0800	950915	W	WW	CAREY	P	34DA6A	0800	D04
MIDDLETON	MARK	WILLIAMS	U10906	1200	950915	W	WW	RYAN	E	34DBAA	1215	A04
MIDDLETON	MARK	WILLIAMS	U10619	2000	950915	W	WW	RYAN	E	******	****	***
MIDDLETON	MARK	KHAPRA	U11600	1415	950918	W	WW	KHAPRA	Y	34D623	1324	D01
MIDDLETON	MARK	WILLIAMS	U14240	1030	950926	D	100	RYAN	E	34D729	1052	D02
MIDDLETON	MARK	KHAPRA	U14424	1300	950926	W	WW	KHAPRA	Y	******	****	***
			U15349	1320	950929	W	WW	KHAPRA	Y	34D939	1405	D02
MIDDLETON	MARK	KHAPRA	U15349	1320	950929	W	WW	KHAPRA	Y	34D6D0	1305	A04
			U16377	1302	950929	W						
MIDDLETON	MARK	KHAPRA	U16397	1600	950929	W	WW	KHAPRA	Y	34DA01	1605	A04
MIDDLETON	MARK	POTUS	U08621	1600	950911	W	STATE D	WIDDESS		******	****	***
MIDDLETON	MARK	POTUS	U10700	1900	950915	D	EAST RO	WIDDESS	R	000000	1914	V15
MIDDLETON	MARK	POTUS	U15354	1700	950929	W	SOUTH AWN	WIDDESS	K	000000	1711	V16

REPORT NO: WAV077B5 WAVES PAGE NO: 2

RUN DATE : 95/12/01 VISITOR SUMMARY FOR 95/11

VISITOR			VISITEE	UIN	TIME	DATE	ROOM	REQUESTOR	DOB	TOA	SSN
MIDDLETON	MARK		RYAN	U34358	1100	951125	EW-209	RYAN	040960	1037	
MIDDLETON	MARK	J	RYAN	U34358	1100	951125	EW-209	RYAN	040960	1037	

COMMITTEE ACCESS

REPORT NO: WAV0778S WAVES PAGE NO: 2

RUN DATE : 95/12/01 VISITOR SUMMARY FOR 95/11

VISITOR		VISITEE		VIN	TIME	DATE	ROOM	REQUESTOR		DOH	TOA	SSN
MIDDLETON	MARK	LAVINE		U28854	2130	951101	WW	LAVINE		******	****	*********
MIDDLETON	MARK	MCLARTY	III	U28920	0930	951102	WW	KHAPRA	Y	101262	0931	
MIDDLETON	MARK	WILLIAMS		U28986	1000	951102	WW	RYAN	B	******	****	*********
MIDDLETON	MARK	LAVINE		U29372	2130	951102	WW	LAVINE		101262	2133	
MIDDLETON	MARK	SKINNER		U29305	1400	951103	WW	KHAPRA	Y	******	****	*********
MIDDLETON	MARK	KHAPRA		U32611	1700	951113	WW	KHAPRA	Y	101262	1727	
MIDDLETON	MARK	KHAPRA		U32900	1010	951114	174	KHAPRA	Y	101262	1037	
MIDDLETON												

REPORT NO: WAV0778S WAVES PAGE NO:

RUN DATE 96/03/01 VISITOR SUMMARY FOR 96/02

VISITOR		VISITEE		VIN	TIME	DATE	ROOM	REQUESTOR		DOB	TOA	SCN
MIDDLETON	MARK	MCLARTY	III	U53843	1300	960201	WW	VARNEY	M	101262	1304	
MIDDLETON	MARK	KHAPRA		U56747	0800	960203	WW	KHAPRA	Y	101262	0002	
MIDDLETON	MARK	MCLARTY		U57695	1300	960206	WW	MOLLY		101262	1535	
MIDDLETON	MARK	KHAPRA		U57561	1515	960206	WW	KHAPRA	Y	******	****	*******
MIDDLETON	MARK	RYAN		U60747	1430	960214	100	RYAN	Y	101262	1400	

COMMITTEE ACCESS

REPORT NO WAV077BS WAVES PAGE NO 295

RUN DATE 96/10/01 VISITOR SUMMARY FOR 96/09

VISITOR		VISITEE	UIN	TIME	DATE	ROOM	REQUESTOR		DOB	TOA	EXH
MIDDLETON	MARK	HERNREICH	U40393	1300	960909	WW	CAMERON	R	101262	1230	
MIDDLETON	MARK	RYAN	U46454	1430	960925	100	RYAN	E	101262	1438	
MIDDLETON	MARK	BUTTON	U47394	1000	960927	100	BUTTON	K	101262	1000	
MIDDLETON	MARK	MCCOY	U47751	1000	960930	EW	MCCOY		101262	1020	
MIDDLETON	MARK	SCHIFF	U48019	1200	960930	WW	SCHIFF		101262	1152	
			U46682	1700	960926	450	SCOTT	H	111455	1633	411789395

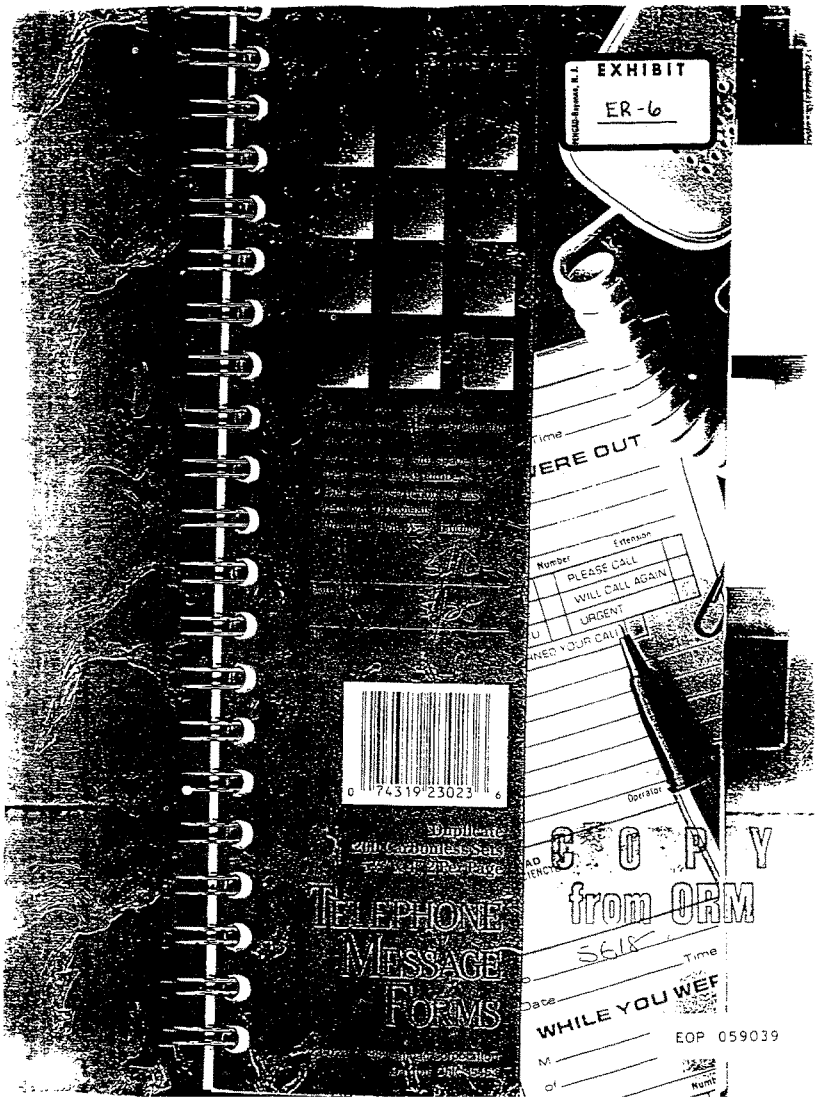


EXHIBIT
ER-6
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PLEASE CALL
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Operator
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WHILE YOU WER
EOP 059039

To Mary.

Date 5-17-95 Time 10 55

WHILE YOU WERE OUT

M. Mark Middleton

of

Phone 543-8386

Area Code Number Extension

TELEPHONED		PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	

RETURNED YOUR CALL

Message Please make lunch reservation for (7) seven on Friday - these are friends of the President who are in town - make under Maggie's name

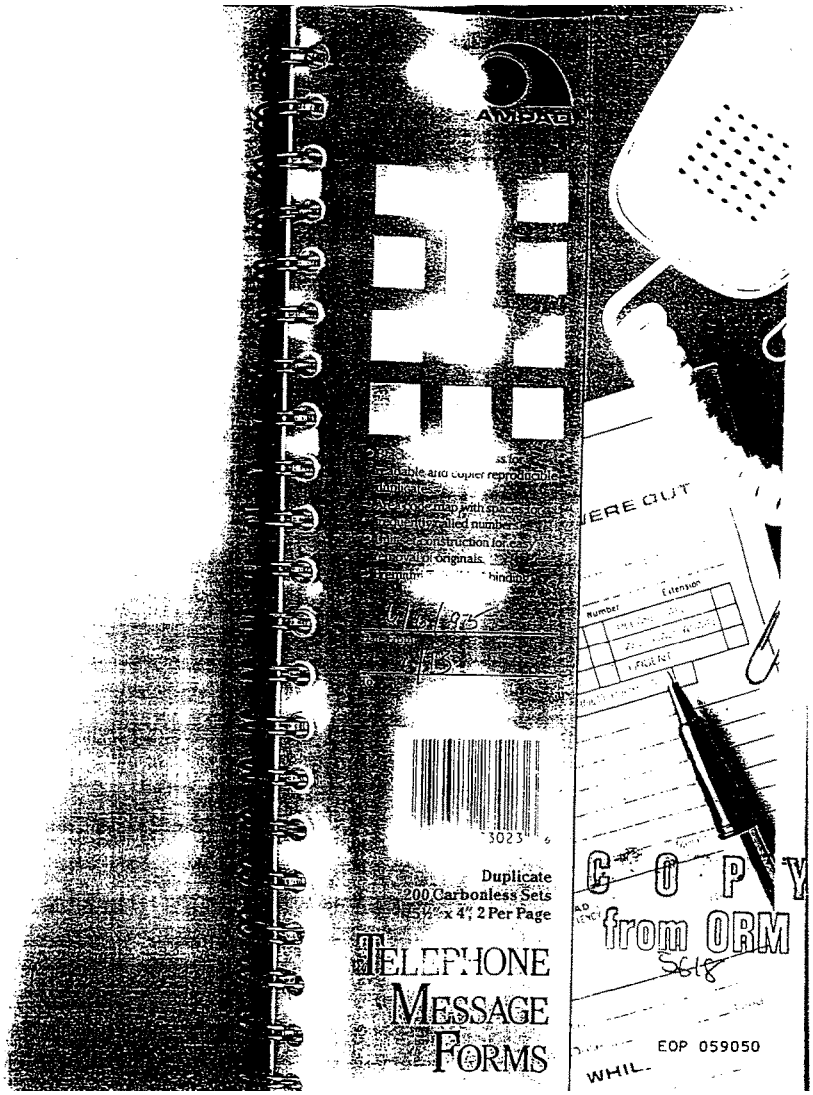
Call if to

Operator MP

AMPAD EFFICIENCY® 23-023 CARBONLESS

Confirm - then he will fax birthdate info.

EOP 059041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200 Carbonless Sets
x 4", 2 Per Page
TELEPHONE
MESSAGE
FORMS
Number
Extension
URGENT
COPY
from ORM
EOP 059050

To Evan

Date 6/9 Time 2:25

WHILE YOU WERE OUT

M. Mark Middleton

of

Phone 513 8386

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

Mon, Mess 2 people
12 - 1:30

Operator

EOP 059051

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from ORM
6389

- Black-image carbonless for readable and reproducible duplicates.
- Area code in [illegible] for frequently called numbers.
- Unit set constructed for easy removal of originals
- Premium Twin-Wire binding.

9/27/95
Date From
10/4/95
To

Duplicate
200 Carbonless Sets
5½" x 4", 2 Per Page

TELEPHONE MESSAGE FORMS

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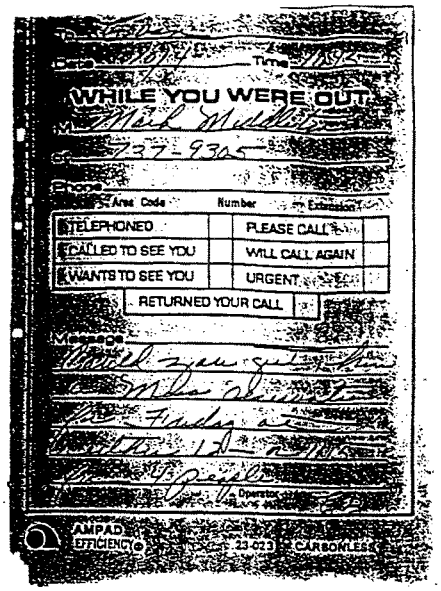
Dayton, Ohio 45463

HERE OUT

Number | Extension

WHILE YOU WE

EOP 059075



WHILE YOU WERE OUT

Mark Mullins

737-9305

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

Would you get

Mike Shmitt

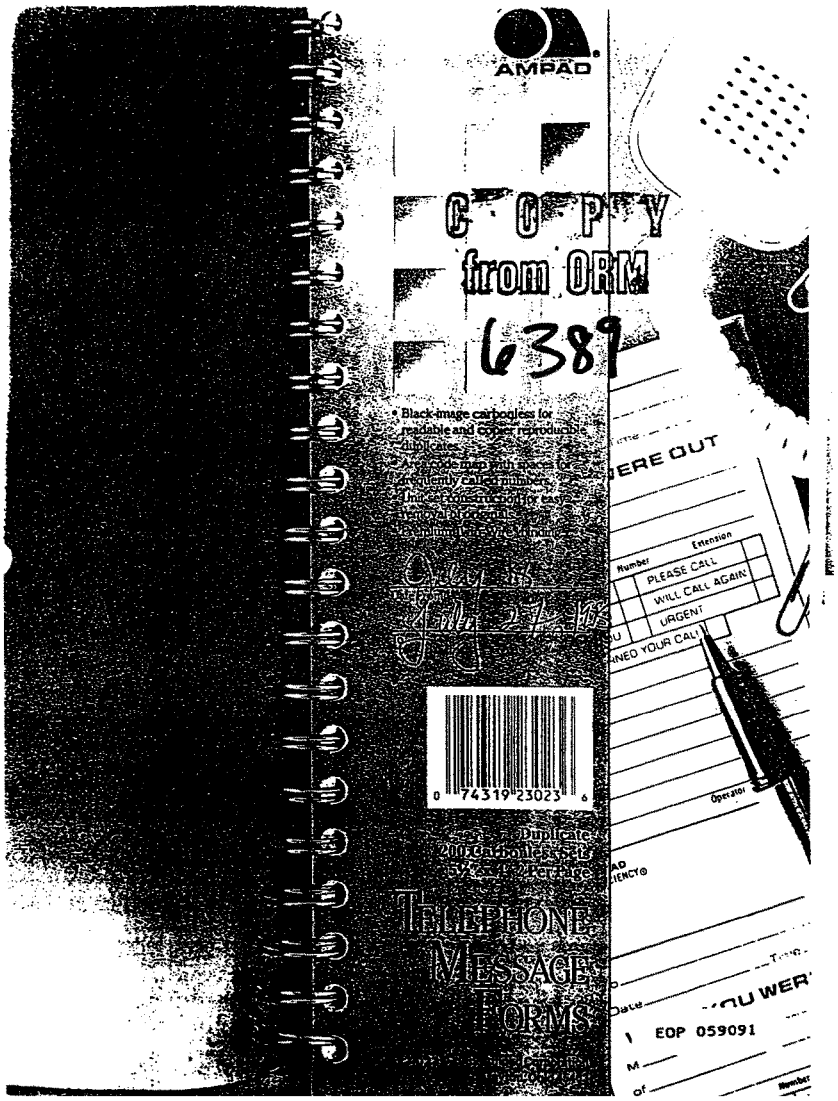
Friday

Operator

AMPAD EFFICIENCY

CARBONLESS

EOP 059076


AMPAD
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0 74319 23023 6
TELEPHONE
MESSAGE
FORMS
ERE OUT
Number
Extension
PLEASE CALL
WILL CALL AGAIN
URGENT
Operator
EOP 059091

To: Evan

Date 7-20 Time 11:0

WHILE YOU WERE OUT

M Mark Middleton

of

Phone 543 8386

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

12 for 3 people

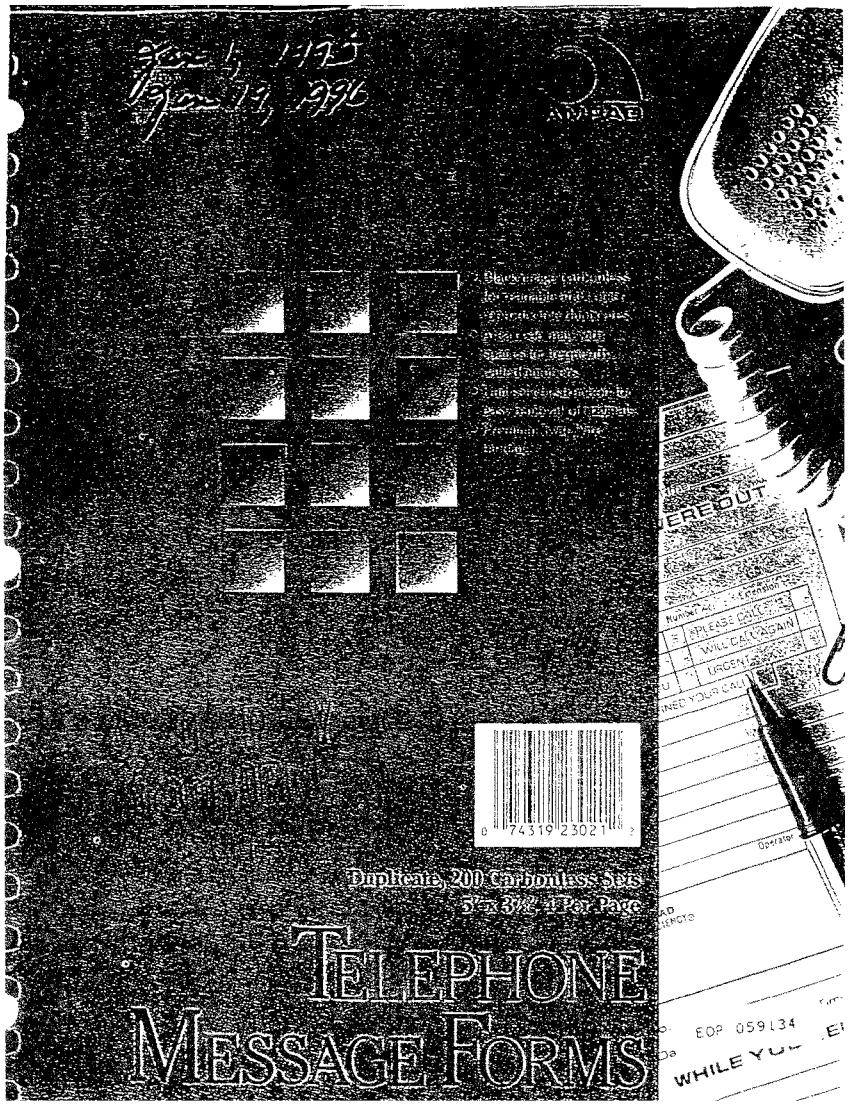
Larry D Jaynes 10-21-46

Jim Messick 9-20-46

Mark Middleton 10-12-62

Operator

AMPAD EFFICIENCY® 23-023 C EOP 059092


AMPAD
Duplicate, 200 Carbonless Sets
5½ x 3½, 4 Per Page
TELEPHONE
MESSAGE FORMS

To Evan

Date 1-17-96 Time 2:20

WHILE YOU WERE OUT

M Linda

of Mark Middleton's office

Phone 737-9305

Area Code Number Extension

TELEPHONED		PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

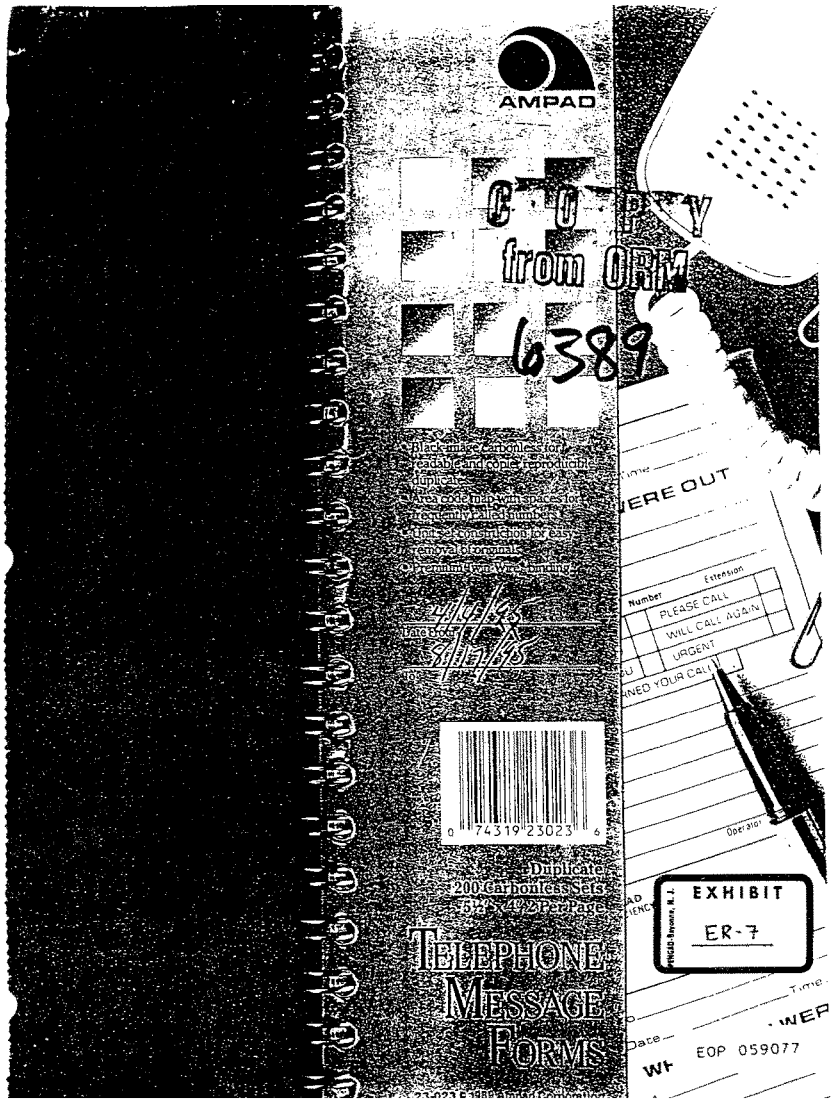
Message Please make a reservation for him in the Mess for Jan. 24th — a table for 4 at 12:00 noon or 1:30 pm. Let her know if you can —

MP

Operator

AMPAD EFFICIENCY 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

EOP 059135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from ORM
6389
Black image carbonless for readable and copier reproducible duplicate
Area code tint with space for frequently called numbers
Time saver perforation for easy removal of forms
Overprinted with wire binding
4/19/95
Date Rec'd
5/17/95
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200 Carbonless Sets
5½" x 14 2 Per Page
TELEPHONE
MESSAGE
FORMS
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Number
Extension
PLEASE CALL
WILL CALL AGAIN
URGENT
Operator
Time
Date
EXHIBIT
ER-7
EOP 059077

To

Date 5/8 Time

WHILE YOU WERE OUT

M

of

Phone

Area Code Number Extension

TELEPHONED		PLEASE CALL	✓
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

EOP 059078

AMPAD
• Black image carbonless for readable and copier reproducible duplicates.
• Area code map with spaces for frequently called numbers.
• Unit set construction for easy removal of originals.
• Premium Twin-Wire® binding.
8/17/95
Date From
8/29/95
To
Duplicate
200 Carbonless Sets
5½" x 4", 2 Per Page
TELEPHONE MESSAGE FORMS
23-923 1989 Ampad Corporation
Number
Extension
PLEASE CALL
WILL CALL AGAIN
URGENT
WHILE YOU WER
EXHIBIT
ER-8
EOP 059099

To Melanne

Date 8-29 Time 5:20 pm

WHILE YOU WERE OUT

Mr. Charlie Tree

of Little Rock

Wash. DC

Phone 202 - 965 - 9899

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	

RETURNED YOUR CALL

Message Spoke with HRC in Little Rock about going to Beijing. Wants to know if he can go with her.

Operator Aiya

AMPAD EFFICIENCY 23-0239 CARBONLESS

EOP 059101

MEMORANDUM

FROM: Betty Currie

DATE: March 28, 1995

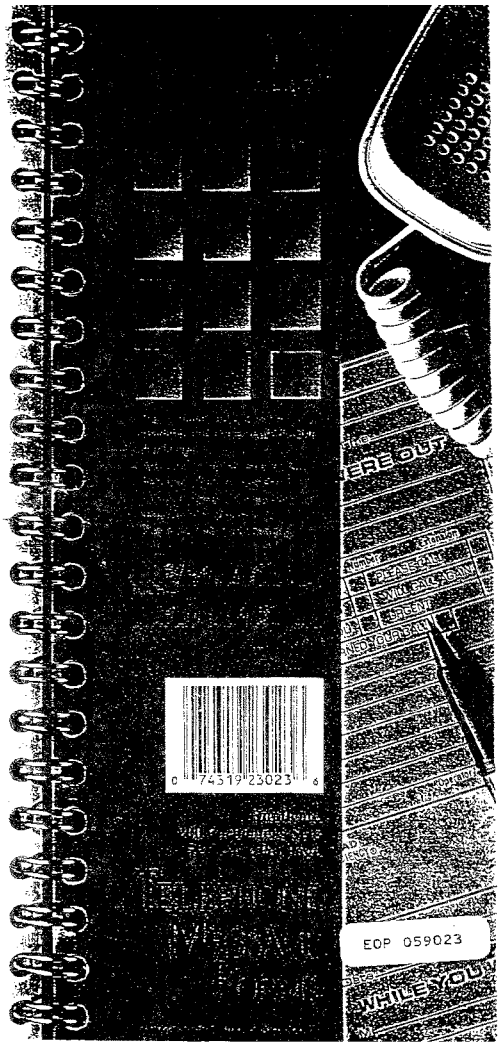
2. Ceandra Scott called - She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the Radio Address. Apparently they were in Maggie's office when request came and Maggie said she didn't know, but to contact DNC ---- I

EXHIBIT

ER-10

Important Numbers

gency Numbers



EOP 059023

COPY
from ORM
5618

To: Pam

Date: 4/3 Time: 4:50

WHILE YOU WERE OUT

M: Johnny Cheung

of:

Phone: 1800-799-1736

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message: Re: Pictures,
(Actually he called for Dan
who I assume here is then
he asked for Ilon)

Operator: A

AMPAD EFFICIENCY®

23

EOP 059024

COPY
from ORM
5618

To Dan [redacted]

Date 4-7 Time [redacted]

WHILE YOU WERE OUT

M. Irene

of AISI

Phone

Area Code Number Extension

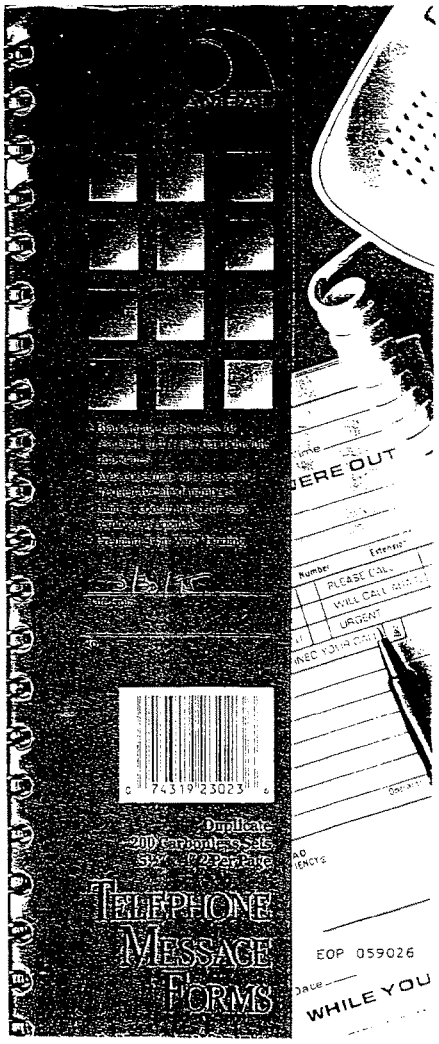
TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Pictures

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

EOP 059025



COPY
from ORM
5618

To: Maria

Date: 4/7 Time: 12:40

WHILE YOU WERE OUT

M. Shane (Galloway)

of (AISI) (Champ Office)

Phone 310-328-3883

Area Code Number Extension

TELEPHONED		PLEASE CALL	✓
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message: Date of Photo

3/11/95

EB

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

EXHIBIT
ER-11

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #609 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

April 5, 1995
(Via Fax 202 863-8174)

Mr. Don Fowler
Chair
Democratic National Committee
430 S. Capitol St. S.E.
Washington, D.C 20003

Dear Don,

I have an important issue here that needs your assistance. As you always know, I am 100% supportive of the DNC and I am always delighted to work with you on every occasion. The China Business Delegation led by Chairman Zheng Hongye met with President Clinton and took some pictures after the radio address on March 11, 1995. It's been over three weeks, I have not seen any of the pictures. I have learned from Mr. Richard Sullivan of DNC that the National Security Council is holding on to those pictures.

In my opinion, if we allow them to take the pictures with our President then we should be courteous enough to let them have the pictures. I am going to China next week and I do need to bring those pictures with me. I have run out of excuses to tell them why the pictures are taking forever. I really appreciate your help in solving this minor issue.

I look forward to seeing you this weekend at Mr. Steven Spielsberg's party. Thank you again for everything.

Sincerely,

Johnny Chung
Chairman/CEO
AISI

Thank you again!

JC rw

CC: Ms. Carol Khare

BUILDING THE U.S. FAX HIGHWAY TODAY

DNC 3102463

EXHIBIT
ER-12

COMPUTER SERVICES REQUEST
OFFICE OF ADMINISTRATION
INFORMATION SYSTEMS AND TECHNOLOGY

DOCUMENT TRACKING #

REQUEST SUBMITTED BY (Point Of Contact): Van Praagh Ian (Please Print: Last, First, M. Initial) — DATE SUBMITTED: 10/16/96 — PHONE: ( ) 6-5105

CUSTOMER, WORK TO BE PERFORMED FOR: Ryan Evan (Please Print: Last, First, M. Initial) — TITLE/POSITION: Special Assistant to the COS (As seen in the EOP Phone Book)

DEPARTMENT: WHO (Agy/PAD) First Lady (Div/PAD) (Sub-Div/Branch) — BUILDING: OEOB — ROOM: 100 — PHONE: ( ) 166266

CUSTOMER INFORMATION:
Pass Type: [X] Permanent [ ] Temporary [ ] Access List [ ] Other
Emp Type: [X] EOP Staff [ ] Detailee [ ] Intern/Student [ ] Other (e.g. Volunteer, Fellow, ...)

CONTRACTOR & Non-EOP EMPLOYEES:
Company / Agency Name — Contract # — Purchase Order # — Co/Agy Phone #: ( )
Company / Agency Address — Co/Agy City — Co/Agy State — Co/Agy Zip:

ACTION REQUESTED: [ ] Check if Additional Documentation attached.

Please PRINT. If Customer is replacing out going staff, or should be setup SAME AS other staff, note same and staff members name. If you have any questions, please contact your Agency Administrator or COTR. Or, call Customer Support at #(202)395-7370.

1) Remove IBM hard drive + monitor
2) Install 486 hard drive + new monitor
3) Network computer
4) Install US 2000 load
5) Install WHODB software

(Specify ONLY when a Specific Date/Time is required and has been approved by ADMIN. MGMT). REQUIRED DATE: ASAP

ACCESS REQUEST:
[ ] Create (New Account) [ ] Modify (Update existing ID) [ ] Delete/Disable (Departing Staff) [ ] Transfer (Transfer Ownership) [ ] Dial-In Access (Justify above) [ ] External Access (Internet & X.400 Mail)

(Fill in the User Name, Server Name and IBM Mainframe ID assigned to customer for all but NEW ID Requests.)
[ ] IBM Mainframe: (7 Char ID)
[ ] User Name: (12 Char ID (ALL-IN-1 & or LAN)) — Novell Server Name: (E.G.: WHADMIN, OMB_A, IRMO....)

EQUIPMENT REQUEST: (If request is for other than New Install, Bar Code# and Previous Equipment OWNER information is required)
[ ] New Install [ ] Upgrade [ ] Re-Assign [ ] Re-Allocate [ ] Return to Inv. [ ] Site Survey
PC Load Type: [ ] US-2000 [ ] OASIS 5.0 [ ] Stand Alone [ ] Other
CPU Bar Code # (EOP BAR-CODE is located on Right Side of CPU) — CPU S/N#: — Dial-In/External Access requires use of Gov't owned equipment
Previous or current OWNER of Equipment if not Customer: (Owner is normally set as Default Login User Name)

EOP 050960

Pager/Cellular [ ] Pager S/N# [ ] Cellular Phone S/N#

Signature of Customer

AUTHORIZED/APPROVED BY
(The Customer has already printed their name above. However, we request the PRINTED names of all other signatures for effective identification.)

Signature of Supervisor or POC (EOP Staff) — Print (Last, First, M. Init.) — Date

Signature of AGY/PAD Admin. or COTR — Print (Last, First, M. Init.): Van Praagh Ian — Date: 10/16/96

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 11:24 am
SENDER: Suettinger, Robert L.
SUBJECT: Subject: RE: PHOTOS? [UNCLASSIFIED]
TO: Darby, Melanie B.

CC: Roth, Stanley O.

The joys of balancing foreign policy considerations against domestic politics. . . I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the DNC, who am I to complain? Neither do I see any unalloyed benefit, either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide (present or former) Chinese officials, with the possible exception of James Y. Sun, "young entrepreneur and self-made millionaire." Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

But a caution -- a warning of future déjà vu. Having recently counselled a young intern from the First Lady's office who had been offered a "dream job" by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler, and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials. My concern is that he will continue to make efforts to bring his "friends" into contact with the POTUS and FLOTUS -- to show one and all he is a big shot, thereby enhancing his business. I'd venture a guess that not all his business ventures -- or those of his clients -- would be ones the President would support. I also predict that he will become a royal pain, because he will expect to get similar treatment for future visits. He will be persistent.

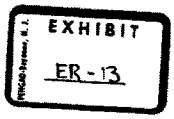
Bob

From: Darby, M. Brooke
To: @ASIA - Asian Affairs
CC: /R, Record at A1
Subject: PHOTOS? [UNCLASSIFIED]
Date: Friday, April 07, 1995 01:12 PM

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese guys and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):



COPY
from ORM

6389

9/27/95
Date From

10/4/95
To

Duplicate
200 Carbonless Sets
5½" x 4" 2 Per Page

TELEPHONE
MESSAGE
FORMS

23-023 [illegible] Corporation
[illegible], Ohio 45463

WHITE

EOP 059073

EXHIBIT
ER-14

To Evan

Date 9/24/85 Time 1:40

WHILE YOU WERE OUT

M Johnny Carson

of

Phone 1-800-997-1736

Area Code Number Extension

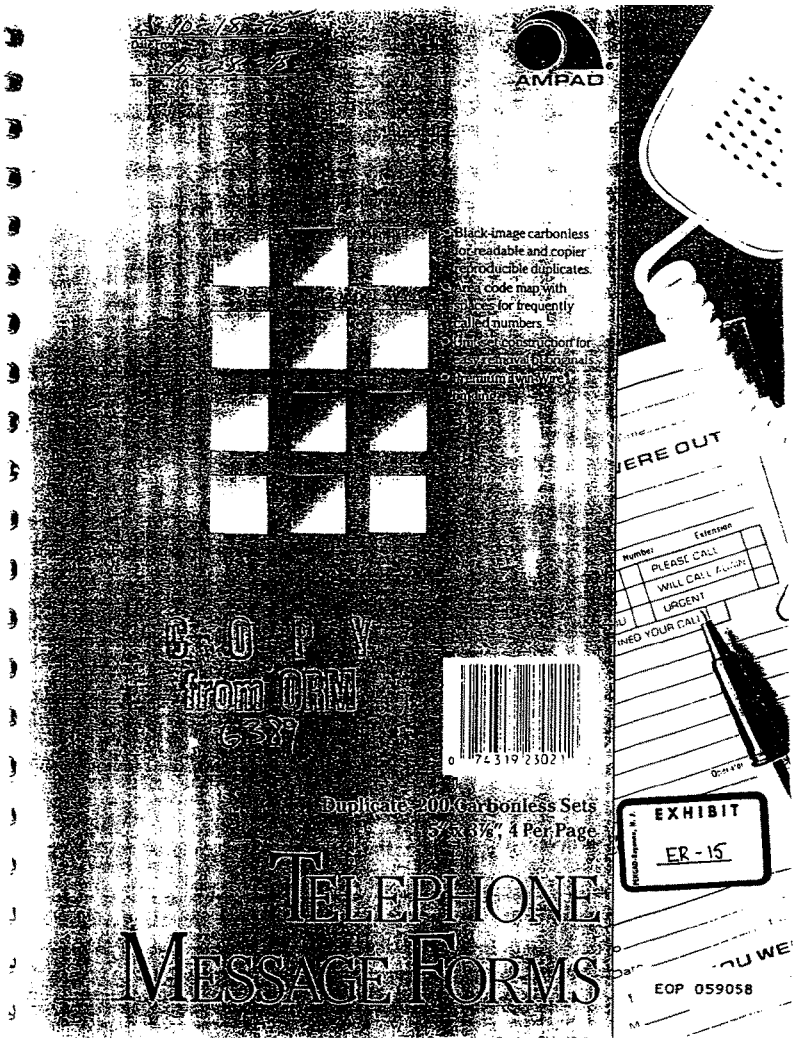
TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message He is sending 2 Baskets of flowers — 1 for Maggie 1 for you tonight

EB

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS


AMPAD
Black-image carbonless for readable and copier reproducible duplicates.
Area code map with space for frequently called numbers.
Duplicate 200 Carbonless Sets
4 Per Page
TELEPHONE
MESSAGE FORMS
from ORM
0 74319 23021
ERE OUT
Number
Extension
PLEASE CALL
WILL CALL AGAIN
URGENT
EXHIBIT
ER-15
EOP 059058

To Evan

Date 10/20/95 Time 12:30

WHILE YOU WERE OUT

M Johnny Chung

of 202-342-5845

Phone

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

Jonathan phones to

Zyuet Maggie.

EB.

Operator

AMPAD EFFICIENCY 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

EOP 059059

SEARCH: FEBRUARY 1994

APPT. DATE	LNAME	FNAME	REQUESTED BY	VISITED	ROOM	ARRIVE TIME	POST	TOD	TO
940202	CHUNG	JOHNY	U73548 BOTWIN	FOUCART	1	13:13	00201	13:47	

EXHIBIT
ER-16

521

COMMITTEE ACCESS

EOP 008708

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
940722	CHUNG	JOHNNY	U49607	ANDERSON	ANDERSON	113	14:26	H0201	0:00	
940721	HUANG	JOHN	U47980	CARTER	POTUS	450	18:17	H0102	0:00	

COMMITTEE ACCESS

EOP 008700

SEARCH: AUGUST 1994

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
940802	CHUNG	JOHNNY	U53397	LEWIS	LEWIS	474	7:35	H0101	8:46	
940804	CHUNG	JOHNNY	U55276	ANDERSON	ANDERSON	119	11:45	H0201	15:07	
940805	CHUNG	JOHNNY	U55663	DICKEY	POTUS	S. LAWN	8:59	A0101	10:32	
940808	CHUNG	JOHN	U56776	ATTA	LEWIS	110	16:06	00201	19:49	
940811	CHUNG	JOHNNY	U58540	ANDERSON	ANDERSON	110	15:04	00201	0:00	
940812	CHUNG	JOHNNY	U59123	ANDERSON	LEWIS	110	17:06	00201	0:00	
940802	HUANG	JOHN	U53397	LEWIS	LEWIS	474	7:35	00101	8:46	

COMMITTEE ACCESS FOP 38698

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVAL TIME	POST	TOD
940920	CHUNG	JOHNNY		U72297	LEWIS	LEWIS	116	14:07	002	0
940921	CHUNG	JOHNNY		U72309	KELLY	QUINN	276	18:23	001	13
940923	CHUNG	JOHNNY		U74202	LEWIS	LEWIS	115	17:33	H02	0
940926	HUANG	JOHN		U74739	WILSON	KRISTOFF	230	17:42	H04	0
940927	HUANG	JOHN		U75119	WEAVER	WEAVER	131	11:02	D01	0

COMMITTEE ACCESS

EOP 003738

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
941005	CHUNG	JOHN	U78887	SHAKOW	SHAKOW	110	10:48	00201	0:00	
941028	CHUNG	JOHNNY	U87935	ANDERSON	ANDERSON	110	10:24	00202	13:05	
941005	HUANG	JOHN	U78362	MIDDLETON	MIDDLETON	W	8:18	A0402	12:14	
941014	HUANG	JOHN	U82068	BURGET	BURGET	10103	10:04	K0102	11:19	

COMMITTEE ACCESS

EOP 008694

RUN DATE : 94/12/01 VISITOR SUMMAR 9 94/11

VISIT		VISITEE	WIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TOA	POA
CHUNG	JOHNNY	EDER	U09317	1800	941101	O	122	EDER	A	000323	1447	002
			U09513	0700	941102	O	97				0711	002
CHUNG	JOHNNY	MITCHELL	U08568	1143	941129	O	487	WOZNIAK	N	007938	1150	002

COMMITTEE ACCESS

REDACTED

EOP 005041

RUN DAT

VISITOR SUMMARY 94/12

VISITOR		VISITEE		TIME	DATE	LOC	ROOM	REQUESTOR			
CHUNG	JOHNNY	LEWIS	U07470	1200	941219	O	115	DUNN			
CHUNG	JOHNNY	ANDERSON	U07496	1300	941219	O	115	ANDERSON	K		
CHUNG	JOHNNY	DUNN	U07496	1310	941227	O	115	DUNN			
CHUNG	JONATHON	BROWN	U03994	0900	941210	O	978	BROWN			
CHUNG	JOHNNY	POTUS	U08186	1930	941220	W	RESIDENCE	BURKE		0000	VIS
			U04597	2000							

527

COMMITTEE ACCESS

REDACTED

EOP 005040

REPO 'O UAVC7705 UA PAGE

RUN D..E 93/02/01 VISITOR SUMMARY FOR 93/01

VISITOR		VISITEE	UIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TD-	POA
CHUNG	JOHNNY	DUNN	U14327	1343	930111	O	115	DUNN	D	021634	1347	002
CHUNG	JOHNNY	MIDDLETON	U18023	1100	930113	O	176	MIDDLETON	M	000020	1044	001
	[illegible]	JOHNSON	[illegible]	0740	930123	O	87	JOHNSON		001361	0738	002
CHUNG	JOHNNY	DUNN	U21312	1303	930120	O	115	DUNN	D	000000	1300	002
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]					
CHUNG	JOHNNY	FRANKFURTER	U13496	0749	930110	W	100/EW	FRANKFURTE	M	******	****	***
CHUNG	JOHNNY	MIDDLETON	U14998	1700	930112	O	176	MIDDLETON	M	001353	1704	002
[illegible]	MARC	BRIDMAN	[illegible]	[illegible]	[illegible]							

528

COMMITTEE ACCESS

REDACTED

EOP 005039

SEARCH: MARCH 1995

APT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
950324	CHUNG	JOHNNY	U42871	RYAN	RYAN	100	9:46	00102	0:00	
950308	CHUNG	JOHNNY	U33371	BAILEY	BAILEY	174	10:15	00202	10:18	
950309	CHUNG	JOHNNY	U36035	RYAN	RYAN	100	11:37	00102	0:00	
950315	CHUNG	JOHNNY	U38788	RYAN	RYAN	100	13:21	00101	0:00	
950313	CHUNG	JOHNNY	U37545	RYAN	RYAN	100	13:40	00101	0:00	
950309	CHUNG	JOHNNY	U36174	RYAN	RYAN	100	14:11	00102	0:00	
950310	CHUNG	JOHNNY	U36758	TARMEY	TARMEY	100	14:17	00102	0:00	
950314	CHUNG	JOHNNY	U38246	RYAN	RYAN	100	14:37	00102	14:38	
950313	CHUNG	JOHNNY	U37718	RYAN	RYAN	100	17:07	00102	0:00	

COMMITTEE ACCESS

EOP 000683

VISITOR		VISITEE	TIME	DATE				REQUESTOR		BADGE		
CHUNG	JOHNNY	HALLEY	0935171	1500	950308	O	174	BAILEY	B	000090	1015	001
CHUNG	JOHNNY	RYAN	0394025	1145	950405	O	100	RYAN		156690	1137	001
CHUNG	JOHNNY	RYAN	0336174	1500	950309	O	100	RYAN	E	434500	1411	001
CHUNG	ZHI	RYAN	0339017	1500	950266	O	100	RYAN				
CHUNG	JOHNNY	TARBOX	0349758	1415	950310	O	100	TARBOX	H	012638	1417	001
CHUNG	JOHNNY	POTUS	0370050	1610	950311	W	WW	CRAWFORD		******	****	***
CHUNG	JOHNNY	RYAN	0372545	1320	950313	O	100	RYAN	E	545410	1340	001
CHUNG	JOHNNY	RYAN	0377118	1710	950313	O	100	RYAN		202515	1707	001
CHUNG	JOHNNY	RYAN	0394266	1500	950314	O	100	RYAN		321321	1437	001
CHUNG	JOHNNY	RYAN	0387789	1318	950315	O	100	RYAN	E	789879	1321	001
CHUNG	JOHNNY	RYAN	0424471	1900	950324	O	100	RYAN	E	000531	0944	001
CHUNG	TONG	MATHIS										

COMMITTEE ACCESS

REDACTED

EOP 005038

SEARCH: MAY 1995

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
930519	CHUNG	JOHNNY	U66214	SHULMAN	MATSUI	450	14:34	00101	0:00	
930504	CHUNG	JOHNNY	U60497	RYAN	RYAN	100	16:05	00101	18:12	
930426	HUANG	JOHN	U58071	KANG	KANG	474	8:54	00102	0:00	
930421	HUANG	JOHN	U54712	RAMSEY	RAMSEY	472	10:13	00401	0:00	
930402	HUANG	JOHN	U46398	WEAVER	WEAVER	131	14:11	00201	0:00	
930519	HUANG	JOHN	U66214	SHULMAN	MATSUI	450	14:36	00101	0:00	
930502	HUANG	JOHN	U59162	RAMSAY	CLAUSSEN	476	15:00	00401	0:00	
930511	HUANG	JOHN	U63107	EDER	EDER	189	15:44	00401	0:00	
930427	HUANG	JOHN	U57128	EDER	EDER	122	15:42	00401	0:00	

COMMITTEE ACCESS

EOF 08680

APPT	DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITER	ROOM	ARRIVE TIME	POST	TOD	TO
	930319	AHN	MI		U66214	SHULMAN	MATSUI	450	14:34	H0101	0100	

COMMITTEE ACCESS

	930324	CHUNG	JOHNNY		U68274	RYAN	RYAN	100	11:01	00102	14:16	
	930303	CHUNG	JOHNNY		U69909	RYAN	RYAN	100	13:28	00102	13:42	
	930319	CHUNG	JOHNNY		U66622	RYAN	RYAN	100	14:04	00101	14:03	

EOP 003717

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	IOD	TO
44											

COMMITTEE ACCESS

930721	CHUNG	JOHNNY		U90915	RYAN	RYAN	100	10:34	00101	15:20	
930710	CHUNG	JOHNNY		U85730	RYAN	RYAN	100	15:11	00101	16:04	
930711	CHUNG	JOHNNY		U85585	RYAN	RYAN	100	16:34	00101	17:23	
930710	HUANG	JOHN		U85773	EHEE	KDEK	180	16:09	00102	17:40	

REPORT NO. WAV07705 WAV PAGE N 103

RUN DATE . 93/08/01 VISITOR SUMMARY FOR 93/07

VISITOR		VISITEE	UIN	TIME	DATE	LOC	ROOM	REQUESTOR	BADGE	TOA	POA
CHUNG	JOHNNY	POTUS	U03990	1800	930711	W	STATE F	WIDDESS			

534

COMMITTEE ACCESS

REDACTED

EOP 005035

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
930925	CHUNG	JOHNNY		U13995	RYAN	RYAN	100	10:36	H0101	12:02	
930926	CHUNG	JOHNNY		U14495	RYAN	RYAN	100	11:52	H0102	13:43	
930923	CHUNG	JOHNNY		U14228	RYAN	MCCOY	101/EW	16:34	A0101	17:22	
930914	HUANG	JOHN		U10396	SCHIFF	SCHIFF	WW	12:17	A0402	13:23	
930913	HUANG	JOHN		U10018	CAMERON	HERNREICH	WW	17:13	A0402	18:05	
930914	HUANG	JOHN		U10165	WEAVER	WEAVER	WESTWIN	9:23	A0402	10:40	

COMMITTEE ACCESS

EOP 003710

RE NO: WAV07785 PAGE

RUN DATE 95/11/02

VISITOR			VISITEE		UIN	TIME	DATE	ROOM	REQUESTOR		DOU	TOA	S.N
CHUNG	JOHNNY		RYAN		U22080	1030	951016	100	RYAN	R		1080	
CHUNG	JOHNNY		RYAN		U23894	1320	951018	100	RYAN			1345	
CHUNG	JOHNNY		RYAN		U23880	1600	951019	100	RYAN			1627	
CHUNG	SUK	K	[illegible]		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			[illegible]	
CHUNG	JOHN	L	PHILIPS		U20127	1130	951026	47H	PHILIPS	J		[illegible]	
CHUNG	PATRICIA	T	PHILIPS		U20122	1130	951026	47H	PHILIPS	J		[illegible]	
CHUNG	JOHN	L	BROWN		U20197	1130	951026	278	BROWN	G		1132	

COMMITTEE ACCESS

REDACTED

EOP 005032

12/27 09:57:32 AM

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
981208	CHUNG	JOHNNY		U40864	MCCOY	MCCOY	101/EW	14:04	00102	14:32	
981221	HUANG	JOHN		U45449	HEISTAD	SCOTT	110	14:24	00101	15:07	
981218	HUANG	JOHN		U44098	EDER	MATSUI	122	13:57	00101	17:31	
981216	HUANG	JOHN		U43718	CAMERON	POTUS	WW	9:39	A0401	101	

537

COMMITTEE ACCESS

SEARCH: FEBRUARY 1996

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVAL TIME	POST	TOD
960209	CHUNG	JOHNNY	U59226	RYAN	RYAN	100	14:29	00102	19:15
960216	HUANG	JOHN	U61367	EDER	MATSUI	122	14:08	00101	15:2
960209	HUANG	JOHN	U58779	EDER	MATSUI	WW	16:46	A0402	20:4

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REPORT NO: WAVO770S WAVES PAGE NO

VISITOR SUMMARY FOR 96/06

VISITOR		VISITEE		UIN	TIME	DATE	ROOM	REQUESTOR			
CHUNG	JOHNNY	FORSTER		U09243	1500	960613	WW	FORSTER	5		1307

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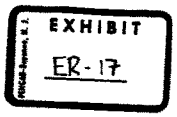

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July 27, 1997, Sunday, Home Edition
SECTION: Part A; Page 1; National Desk

LENGTH: 3032 words

HEADLINE: FIRST LADY'S AIDE SOLICITED CHECK TO DNC, DONOR SAYS; FUND-RAISING: ADMINISTRATION DENIES ACCOUNT BY TORRANCE BUSINESSMAN JOHNNY CHUNG, WHO GAVE $50,000 CONTRIBUTION TO HILLARY CLINTON'S CHIEF OF STAFF.

BYLINE: WILLIAM C. REMPEL and ALAN C. MILLER, TIMES STAFF WRITERS

BODY:

Contradicting accounts by the Clinton administration, one of the Democratic Party's biggest campaign donors says he gave a $ 50,000 check to the first lady's chief of staff on White House grounds in 1995 in direct response to solicitations by aides of Hillary Rodham Clinton.

Southern California entrepreneur Johnny Chien Chuen Chung said he was seeking VIP treatment for a delegation of visiting Chinese businessmen when he was asked to help the first lady defray the cost of White House Christmas receptions billed to the Democratic National Committee.

Chung, who has refused to cooperate with investigators unless granted immunity from prosecution, told The Times during interviews that he realized such special treatment hinged on his willingness to make a political contribution.

"I see the White House is like a subway: You have to put in coins to open the gates," Chung said in his first public comments on the controversial episode.

On Friday, White House Communications Director Ann Lewis disputed Chung's account. She said of the first lady's aides: "At no time did they solicit a contribution from Mr. Chung."

Lewis also denied that the $ 50,000 check had anything to do with the White House perquisites extended to the Torrance businessman and the Chinese delegation. She said the first lady's aides may have gotten Chung and his guests into lunch at the White House mess hall and arranged a photo with Hillary Clinton but that any such efforts on his behalf were "a courtesy we could do and have done for friends."

Chung's story may compound political embarrassment for the White House and raise serious legal questions, including whether Hillary Clinton's closest aides violated the Hatch Act prohibiting federal employees from soliciting contributions, particularly in a government workplace.

And it poses new headaches for Margaret Williams, the first lady's former chief of staff, who has acknowledged accepting Chung's check. The Times has learned that she is the subject of a pending inquiry by the federal agency charged with enforcing the Hatch Act as well as scrutiny by congressional panels probing campaign finance abuses.

"The main point is that you're not supposed to use your government clout to raise money," former White House Counsel Abner J. Mikva said in reference to restrictions on fund-raising by federal employees.

Chung's detailed version of White House events, combined with other newly available information, challenges the president's insistence that Williams played "a completely passive" role in relaying an unsolicited $ 50,000 check to the DNC.

Williams, who recently left the White House, and Evan Ryan, an aide in the first lady's office who met with Chung and the Chinese delegation, declined to be interviewed.

In recent interviews, Chung, 43, also denied Republican allegations that he may have funneled Chinese government money to the DNC. GOP senators raised the issue in connection with the recent disclosure that $ 150,000 was transferred from Chinese beer makers via the Bank of China to Chung's California bank account three days before his $ 50,000 donation.

A partial review of Chung's personal financial records shows that contrary to GOP assertions, Chung had in excess of $ 300,000 in various bank accounts at the time, indicating that he could have covered his $ 50,000 contribution without Chinese funds.

Chung emphasized that the transferred $ 150,000 was earmarked for creation of two companies to launch a business venture with the Beijing brewers, who had nothing to do with the March 1995 donation and Washington visit.

Chung also was critical of former DNC Finance Director Richard Sullivan, who told a Senate hearing this month that he had qualms about the origins of the March 1995 donation. Sullivan, he said, was never reluctant to take his money before the fund-raising controversy erupted last fall.

"Most of my contributions were solicited by Sullivan and the DNC," Chung said, noting that just one month after the $ 50,000 donation, he gave Sullivan another $ 125,000 at a Hollywood fund-raiser with the president. "I hand my checks personally to Richard Sullivan. He never says he was worried about my money. Never."

Chung's visit to Washington in March 1995 did raise some concerns in the Clinton administration. A National Security Council aide later described him in a memo as "a hustler" trying to exploit his contacts at the White House.

But this did not stop Chung from being admitted. Records show about 20 of his 49 visits to the White House occurred after the warning.

Chung, a Taiwan-born fax company owner-turned-international businessman, contributed $ 366,000 between mid-1994 and last November's election. He said Sullivan was in frequent contact, advising him of upcoming fund-raising events and even visiting his Torrance office.

The DNC recently returned all of Chung's donations because it said an internal audit could not confirm that the money actually came from the businessman. Chung and his attorneys have long insisted that the donations were funded from Chung's financial reserves and that he represented no foreign interests.

"They call Johnny a hustler and there's no question he was hustling the DNC, the White House and anybody else who could help him," said Chung's Santa Monica attorney, Brian Sun. "But he was hustling business. He had absolutely no political agenda.

"Johnny Chung's not promoting the policy interests of some foreign government; he's promoting Johnny Chung," he said. "That's not a crime. It's the American way."

Chung Escorts Chinese Delegation to Capitol

By March 1995, Johnny Chung's growing involvement in politics was earning him a reputation in Asian business circles. He squired the Chinese beer maker to a Clinton Christmas party in 1994. Then, Chung said, Zheng Hongye, chairman of the China Chamber of International Commerce, asked him to open the same doors for a delegation of major executives he was leading on a U.S. visit.

"I am trying to build new business in China, so I am happy to do my best to help," said Chung, who touted the delegation as "very important and very powerful leaders" in a letter to the White House.

When he escorted the five-member delegation to Washington, his first stop was DNC headquarters. There, on Wednesday, March 8, 1995, DNC Chairman Donald L. Fowler welcomed them and posed for pictures with an arm around Chung's shoulder.

But Chung had come with an ambitious wish list: a White House tour, a meeting with Hillary Clinton, lunch in the White House mess and admission to the taping of President Clinton's Saturday morning radio address. And none of it was arranged. "I was on the limb," Chung said.

After Sullivan said the party could do little for him, Chung said he offered to make another contribution to the DNC without specifying an amount.

"I did not wave around a check," Chung said. "That is not my style. That is not a businessman's style."

Sullivan testified before the Senate Governmental Affairs Committee this month that Chung had offered to donate $ 50,000 if he could get his Chinese associates into the presidential radio address. He said he turned Chung down because this was inappropriate and, moreover, "I had a sense that he might be taking money from them . . . and then giving it to us."

Federal election law prohibits the acceptance of foreign contributions.

Sullivan's attorney, Robert F. Bauer, said the former DNC official's concern about Chung was limited to this episode.

"As to Johnny's other activities, Richard's general recollection was that the DNC accepted his bona fides, knew he was an American citizen, knew that he had a recognized business in Los Angeles," Bauer said. "His contributions were considered lawful. . . ."

DNC officials only agreed to arrange a standard White House tour. Dissatisfied, Chung headed for the White House alone.

He was admitted, and found his way to Room 100 of the Old Executive Office Building--the first lady's office.

Chung felt he had a special relationship with Hillary Clinton because he says he had wrangled a meeting with her years earlier at the governor's mansion in Little Rock, Ark., while touting his new fax service to state officials.

Since then, he has been photographed with her on about a dozen occasions, from the White House to the U.S. Embassy in Beijing. One of the earliest fund-raising events showed Chung and his family with the Clintons at the president's 48th birthday party. A few months later, he contributed $ 40,000 to attend a luncheon featuring Hillary Clinton in Los Angeles.

And in the first lady's office that March day, according to Chung, he found another opportunity to be generous.

Here is Chung's version of those disputed events:

Chung was greeted by Ryan, who was then a staff assistant. He showed her the business cards of his Chinese companions and asked if arrangements could be made for them to eat lunch in the White House mess and meet Hillary Clinton. Chung also asked if there was anything he could do to help the White House.

Ryan left for about 15 to 20 minutes and returned, saying she had spoken with Williams. Then, she said: "Maybe you can help us."

The aide told Chung that "the first lady had some debts with the DNC" from expenses associated with White House Christmas parties. Chung believes that Ryan mentioned a figure of around $ 80,000.

(The Times could not confirm such an expense specifically charged to Hillary Clinton. But DNC spokesman Steve Langdon said the DNC does pick up the tab on a number of White House holiday parties, amounting to a total of $ 300,000 to $ 400,000 a year.)

Ryan told him, Chung said, that she was relaying the request on behalf of Williams, who hoped Chung could "help the first lady" defray those costs.

"Then a light bulb goes on in my mind. I start to understand," Chung said. "I said I will help for $ 50,000."

After making that commitment, Chung said, he left the White House confident that his wish list would be substantially fulfilled.

The next morning, Chung said, he went back to the White House and was escorted to Ryan's desk in the reception area of the first lady's office. He said he gave her an unsealed envelope.

According to Chung, Ryan lifted the flap and examined the contents. Inside was his check and a note to Williams, which he recalled said something like: "To Maggie--I do my best to help. Johnny Chung."

A short time later, Chung said, the chief of staff joined them and Ryan handed the envelope to her. Williams, he said, immediately led him into her private office and called to reserve a table for the Chinese delegation at the White House mess.

Williams has since told congressional investigators that she never looked at the check. Chung said there was no need for her to look inside the envelope. "I know she knew what was inside, because to me it was her idea that I help," he said.

Before the delegation convened for lunch around a table of red, white and blue linens in the White House mess, Chung was advised that another wish list item had come true. The first lady could see them before addressing a teachers' group that afternoon.

"Maggie set up everything," Chung said.

Later, waiting for Hillary Clinton in a White House reception room, Chung said he asked if the first lady had been informed of his donation and Ryan responded, "Yes, she definitely knows."

Shortly before 4 p.m. the Chinese businessmen stood for the arrival of Hillary Clinton. And there, in front of the delegation Chung was bent on impressing, he said the first lady declared: "Welcome to the White House, my good friend."

White House Denies It Violated the Hatch Act

White House officials confirm that Chung came to the first lady's office on March 8 and 9, 1995. They have acknowledged that Williams was given a check for $ 50,000 from Chung in the White House and that Chung was seeking admission to the president's radio address. And they say Williams may have arranged the lunch and the photo with Hillary Clinton.

But they agree with little else from Chung's version of events. They maintain that Williams and Ryan did not solicit the donation and did not provide any benefits as a result of it.

"Maggie Williams recalls that, on several occasions, Johnny Chung told her that he wanted to make a personal contribution to the Clintons," Lewis said. "She told him that he could not make a personal contribution. She eventually told him he could give to other entities, such as the Democratic National Committee."

Lewis said Chung was told the first lady's office could not arrange his attendance at the president's radio address.

And, Lewis said, Ryan "is sure that she had no discussion of financial contributions with Johnny Chung."

The Hatch Act prohibits a federal employee from "knowingly soliciting, accepting or receiving a political contribution from any person" and soliciting or collecting a donation "in any building occupied by a federal employee in the discharge of official duties."

The White House maintains that Williams "absolutely did not" violate the law by taking Chung's check because regulations allow a government official to accept a political contribution as long as it is forwarded immediately to a political party.

Chung's account, if true, could constitute evidence of improper fund-raising, said attorneys familiar with election law.

"This information implicates the first lady's chief of staff in activity that she knew, or should have known, was fund-raising at the White House, and that may be illegal," said Jan Baran, an expert on campaign finance law and a former Republican National Committee general counsel.

Louis Vega, a spokesman for the Office of Special Counsel, which investigates alleged Hatch Act violations, said the agency had opened "a general inquiry regarding Maggie Williams" and campaign fund-raising earlier this year. He declined to provide any details, including whether the inquiry concerned the $ 50,000 contribution from Chung.

Violation of the Hatch Act can result in employment-related penalties, ranging from a warning letter to dismissal.

The probe, Vega said, is on hold at the request of the Justice Department to avoid impeding an ongoing criminal investigation. He said that generally means the Justice Department inquiry involves the same subject or witnesses.

The Justice Department declined to comment on whether Williams is under scrutiny by its task force investigating fund-raising allegations.

Williams, who has served Hillary Clinton for the past four years, has recently married and plans to move to France.

Chung's Entourage Meets the President

March 9, 1995, had been a costly but very successful day for Chung and his entourage: A White House tour, lunch in the executive mansion and a photo op with the first lady.

Was the delegation impressed?

"They were very happy, but they say to me, 'Do you think we can see the president?' " Chung recalled. He determined to press again for entre to Clinton's Saturday radio address.

On Friday, Chung returned to the White House, was admitted into the compound by the first lady's office, and repeated his request to Ryan. He put in more calls to the DNC.

One call went to Carol Khare, assistant to DNC Chairman Fowler. Chung told her he was a friend of the first lady and wanted to take this important delegation of Chinese executives to the radio address. Khare said she would look into it.

That phone call is believed to be her first encounter with Chung. She later complained to colleagues that Chung became a nuisance, always asking for favors.

"He doesn't take 'no' very easily," she told acquaintances. "He's like a bulldog; if he wants something he keeps chewing on it until he gets it."

On the eve of the radio address, Chung got what he wanted, with the DNC's assistance.

Less clear is whether the $ 50,000 helped pave the way. Chung believes that he told Khare about his gift, but the former DNC official told others she only recalls his claim of friendship with Hillary Clinton.

That Saturday, after the president addressed the nation on radio, he posed for pictures in his office with the Chinese delegation. Afterward, he expressed concern about who they were and whether they had been screened to prevent embarrassment if the photos were released.

Clinton's uneasiness prompted a review by NSC officials who delayed giving the photos to Chung for a time. It was that reassessment that produced the memo calling the entrepreneur a hustler.

Chung is not offended by the label. It is, he believes, an attribute of aggressive American business people. What bothers him, he says, are accusations questioning his patriotism.

"I am American citizen," Chung said. "My shareholders are mostly American citizens. I am all-American businessman."

He has spent heavily on political campaigns, he said, to assure the kind of access that makes him appear to be "a big man in America" to prospective clients overseas.

Despite his promotional efforts, Chung's deal with the Chinese beer maker collapsed after a top-level management reorganization in Beijing. And Chung said no new business resulted from the delegation visit in 1995.

The Democratic Party, meanwhile, hasn't forgotten Johnny Chung.

Barely a month ago, according to attorney Sun--even as the DNC was returning all of his donations--Chung received an invitation to join Clinton and Vice President Al Gore for a Broadway fund-raiser in New York.

This time, Chung declined.

Rempel reported from Los Angeles and Miller from Washington. Times staff writer Ronald J. Ostrow and researcher Janet Lundblad in Washington contributed to this story.

(BEGIN TEXT OF INFOBOX / INFOGRAPHIC)
Visit to the White House

Southern California entrepreneur Johnny Chien Chuen Chung says he gave this $ 50,000 check to a top aide of Hillary Rodham Clinton during a White House visit in 1995. He alleges the money was solicited by close aides of the first lady--a possible violation of the Hatch Act--and enabled him to favorably impress prospective business clients from China.

GRAPHIC: PHOTO: Chung, second from right, and his companions were able to greet their pictures taken with Hillary Clinton and eat lunch at the White House mess. Officials say Clinton aides played only a "passive" role in relaying the contribution to the Democratic National Committee. PHOTO: Johnny Chung, left, poses with President Clinton and Chinese businessman Sun Jianfeng after attending Clinton's radio address. PHOTO: Johnny Chien Chuen Chung GRAPHIC-CHART: Visit to the White House / Los Angeles Times

LANGUAGE: English

LOAD-DATE: July 27, 1997

[The deposition of Gina D. Ratliffe follows:]

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
U.S. HOUSE OF REPRESENTATIVES,
Washington, DC.

DEPOSITION OF: GINA D. RATLIFFE

TUESDAY, NOVEMBER 4, 1997

The deposition in the above matter was held at the Law Office of David N. Zacks, Lewis Clay & Munday, P.C., 660 Woodward Avenue, Suite 1300, First National Building, Detroit, Michigan, commencing at 12:05 p.m.

Appearances:

Staff Present for the Government Reform and Oversight Committee: Jennifer M. Safavian, Investigative Counsel; and Kristin Amerling, Minority Counsel.

For MS. RATLIFFE:

DAVID N. ZACKS, ESQ.
Lewis Clay & Munday, P.C.
660 Woodward Avenue
Suite 1300, First National Building
Detroit, Michigan

Ms. SAFAVIAN. Good morning. On behalf of members of the Committee on Government Reform and Oversight, I appreciate and thank you for appearing here today. This proceeding is known as a deposition. The person transcribing this proceeding is a House reporter and notary public. I will now request that the reporter place you under oath.

THEREUPON, GINA D. RATLIFFE, a witness, was called for examination by Counsel, and after having been first duly sworn, was examined and testified as follows:

Ms. SAFAVIAN. I would like to note for the record those who are present at the beginning of the deposition. My name is Jennifer Safavian. I am the designated Majority counsel for the committee; Ms. Kristin Amerling is the Minority staff; and Ms. Ratliffe is represented by David Zacks.

Although this proceeding is being held in a somewhat informal atmosphere, because you have been placed under oath, your testimony here today has the same force and effect as if you were testifying before the committee or in a courtroom.

If I ask you about conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words, and then you may give me the gist or substance of any such conversation to the best of your recollection.

If you recall only part of a conversation or only part of an event, please give me your best recollection of those events or parts of conversation that you recall.

If I ask you whether you have any information upon a particular subject and you have overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you do have such information and indicate the source, either a conversation or documentation or otherwise, from which you derive such knowledge.

Before we begin the questioning, I want to give you some background about the investigation and your appearance here. Pursuant to its authority under House Rules X and XI of the House of Representatives, the committee is engaged in a wide-ranging review of possible political fund-raising improprieties and possible violations of law.

Pages 2 through 4 of House Report 105–139 summarize the investigation as of June 19, 1997, and encompass any new matters which arise directly or indirectly in the course of the investigation. Also pages 4 through 11 of the report explain the background of the investigation.

All questions relating either directly or indirectly to these issues, or questions which have a tendency to make the existence of any pertinent fact more or less probable without the evidence, are proper.

The committee has been granted specific authorization to conduct this deposition pursuant to House Resolution 167, which passed the full House on June 20, 1997. Committee rule 20, of which you have received a copy, outlines the ground rules for the deposition.

Majority and Minority counsel will ask you questions regarding the subject matter of the investigation. Minority counsel will ask questions after Majority counsel has finished. After the Minority counsel has completed questioning you, a new round of questioning may begin.

Pursuant to the committee's rules, you are allowed to have an attorney present to advise you of your rights. Any objection raised during the course of the deposition must be stated for the record. If a witness is instructed not to answer a question or otherwise refuses to answer a question, Majority and Minority counsel will confer to determine whether the objection is proper. If counsel agree that a question is proper, the witness will be asked to answer the question. If an objection is not withdrawn, the Chairman or a member designated by the Chairman may decide whether the objection is proper.

This deposition is considered as taken in executive session of the committee, which means it may not be made public without the consent of the committee pursuant to clause 2(k)(7) of House Rule XI. You are asked to abide by the rules of the House and not discuss with anyone, other than your attorney, this deposition and the issues and questions raised during this proceeding.

Finally, no later than 5 days after your testimony has been transcribed and you have been notified that your transcript is available, you may submit suggested changes to the Chairman. The transcript will be made available for your review at the committee office. Also, we can send a copy out, and we will provide a confidentiality agreement that you will have to sign prior to us sending that out. But that will not be a problem.

Committee staff may make any typographical and technical changes requested by you. Substantive changes, modifications, clarifications or amendments to the deposition transcript submitted by you must be accompanied by a letter requesting the changes and a statement of your reasons for each proposed change. A letter requesting any substantive changes, modifications, clarifications or amendments must be signed by you. Any substantive changes, modifications, clarifications or amendments shall be included as an appendix to the transcript, conditioned upon your signing of the transcript.

Do you understand everything we have gone over so far?

The WITNESS. [Affirmative nod.]

Ms. SAFAVIAN. Do you have any questions?

Ms. AMERLING. You need to verbalize.

The WITNESS. Yes, I understand.

EXAMINATION BY MS. SAFAVIAN:

Ms. SAFAVIAN. Do you have any questions?

The WITNESS. Not right now.

Ms. SAFAVIAN. I will be asking you questions concerning the subject matter of this deposition. Do you understand?

The WITNESS. Yes.

Ms. SAFAVIAN. If you don't understand a question, please say so, and I will repeat it will or rephrase it so you understand the question.

Do you understand that you should tell me if you do not understand any of my questions?

The WITNESS. I do.

Ms. SAFAVIAN. The reporter will be taking down everything we say and will make a written record of the deposition. You must give verbal, audible answers because the reporter cannot record what a nod of the head or other gesture means.

Do you understand you cannot answer with an uh-huh or unh-unh?

The WITNESS. Yes.

Ms. SAFAVIAN. If you can't hear me, please say so and I will repeat the question or have the court reporter read the question to you.

Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. Please wait until I finish each question before answering, and I will wait until you finish your answer before asking the next question.

Do you understand this will help the reporter make a clear record because he cannot take down what both of us are saying at the same time?

The WITNESS. Yes.

Ms. SAFAVIAN. Your testimony is being taken under oath as if we were in court. If you answer a question, it will be assumed you understood the question and the answer was intended to be responsive to it.

Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. Are you here voluntarily, or are you here as a result a subpoena?

The WITNESS. Voluntarily.

Ms. SAFAVIAN. Do you have any questions about the deposition before we begin the substantive portion of the proceeding?

The WITNESS. No.

Ms. SAFAVIAN. Can we go off just for a second.

[Discussion off the record.]

Ms. SAFAVIAN. Let me just note for the record that Ms. Ratliffe has voluntarily provided the committee this morning with several manila folders full of documents, including letters and cards and other miscellaneous things. She did that voluntarily, and we will be using some of those during the deposition.

Ms. AMERLING. Just so the record is clear, those documents were provided in response to a request from the Majority; is that correct?

Ms. SAFAVIAN. That is correct.

Ms. AMERLING. For documents relating to Mr. Johnny Chung?

Ms. SAFAVIAN. That is correct.

Ms. AMERLING. Thank you.

Mr. ZACKS. Just so the record is clear, the documents produced by Ms. Ratliffe today constitute any and all documents in her possession or control that relate to either her White House internship and/or her dealings with Mr. Chung.

EXAMINATION BY MS. SAFAVIAN:

Question. Okay. Ms. Ratliffe, could you please state your full name and spell it for the record?

Answer. Gina, G-I-N-A, Devee, D-E-V-E-E, Ratliffe, R-A-T-L-I-F-F-E.

Question. Have you ever been known by any other names or used any other names?

Answer. No.

Question. What is your date of birth and Social Security number?

Answer. [Redacted].

Question. And your current address?

Answer. [Redacted].

Question. And how long have you resided at that address?

Answer. It has been my permanent address for 10 years, but I have lived in numerous places.

Question. Do you presently live there with your family?

Answer. Yes.

Question. As far as your other numerous places that you have lived——

Answer. I lived in Kalamazoo, Michigan, for 3 years when I went to school. I lived umpteen places when I was in D.C., all throughout D.C. I lived in Boston for 5 months. I did some campaign work, so housing was fairly sporadic.

Question. Was this when you were in Boston that you did campaign work, or Washington?

Answer. Yes. I went out to Seattle for a while, up in New Hampshire for a little bit.

Question. Have you ever lived outside the United States?

Answer. No.

Question. And you mentioned that you attended college. Which college did you attend?

Answer. Western Michigan University.

Question. Did you graduate from Western?

Answer. Yes.

Question. What was your degree?

Answer. It was public law, political science, BA in '95.

Question. Did you receive any other degrees?

Answer. No.

Question. Have you spoken with anyone other than your counsel and with, perhaps, my staff in scheduling your deposition? Have you spoken with anybody else about this deposition?

Answer. Yes. Two friends know that I have to give it.

Question. And are these friends located here in Michigan?

Answer. [Affirmative nod.]

Mr. ZACKS. You have to answer verbally.

The WITNESS. Okay. Yes, they are.

EXAMINATION BY MS. SAFAVIAN:

Question. And did either one of these friends ever work or live in Washington, D.C.?

Answer. No.

Question. Was it a matter of just mentioning to them you had to give this deposition?

Answer. Yes.

Question. Did you review any documents in preparation for the deposition?

Answer. What do you mean? Did I review——

Question. Any documents?

Answer. What I showed you and what was sent to me by your committee.

Question. Okay. Have you been asked by White House counsel or anybody else to——

Ms. AMERLING. Excuse me, I have a question here. Do you have copies of the documents that you sent to Ms. Ratliffe, because we didn't receive a copy.

Ms. SAFAVIAN. They are just the normal letter.

No, I don't have copies. It is just the normal letter and rules that we send to every deponent. I am surprised you didn't get a copy.

Ms. AMERLING. I am not talking about that. I wanted to clarify what documents she had received. She mentioned she reviewed documents.

EXAMINATION BY MS. SAFAVIAN:

Question. Would you like to clarify that?

Answer. I received a letter from Dan Burton requesting my deposition, and my attorney received a letter also from Richard Bennett, and then I received the House Resolution 167 package. That is it.

Ms. AMERLING. Thank you.

EXAMINATION BY MS. SAFAVIAN:

Question. As I was asking you, have you been asked by White House counsel or anybody else to provide any documents in response to a subpoena?

Answer. No.

Question. Can you briefly describe your employment history after college, and if it is going to be a lot, tell me.

Answer. No, it is not a lot.

Question. Okay.

Answer. My first job out of college was working for Johnny Chung, and that lasted very briefly, a few months. Then I worked for a group called Campus Green Vote, which is a student environmental action committee.

Question. Where was that located?

Answer. It was in D.C. And partially while I worked for Campus Green Vote, they were part of a coalition called Youth Vote '96. That is when I went to Boston, to Harvard.

I also worked for a political action committee called the New Democrat Network, and that was all in Washington.

And then I came home last fall and work at a counseling clinic currently.

Question. Can you give me a date when you returned home?

Answer. It was the end of September.

Question. Of '96?

Answer. Yes.

Question. And you currently work——

Answer. At a counseling clinic——

Question. The name of it?

Answer [continuing]. Here in Michigan.

Question. Can you provide the name of it?

Answer. It is called Access Christian Counseling.

Question. What do you do there?

Answer. I am the marketing director.

Question. You have held that job since last fall?

Answer. Um-hmm.

Question. Okay. Let's just back up a little bit.

You mentioned your first job after college was with Johnny Chung. When did you begin your employment with him?

Answer. The spring of '95.

Question. Can you be any more specific?

Answer. I believe it was April, end of April.

Question. Towards the end of April?
Answer. Yes.
Question. And how long did that go until?
Answer. I believe I wrote a resignation letter in July. I included that in what I gave you.
Question. What brought you out to Washington, D.C.?
Answer. I started interning out there the summer of my junior year of college. I had an internship at the Supreme Court the fall of '94. I worked in the Curator's Office.
And then I also was involved with the American University Washington Semester program. I was working on a research project.
Question. For a semester?
Answer. Yes.
After that, I got the internship at the White House, and so I stayed in D.C. my senior year, but still graduated from Western.
Question. Where did you attend school, American?
Answer. I went to American the first semester, and then I received other credits for my internship and papers that I wrote for my second semester credits.
Question. This would have been for 1995?
Answer. Um-hmm.
Question. Okay. The internship that you got with the White House, when did you get that?
Answer. If started January '95.
Question. And how did you get that? Did you apply for it?
Answer. Um-hmm.
Question. Can you just give me the process of that?
Answer. There is a standard White House internship process. You fill out an application. I did go for—I wanted to be in the First Lady's office, and I went and spoke with a couple of people on her staff, sort of like informal interviews.
Question. Was this after you sent in your application?
Answer. Um-hmm. I think so. This all happened at sort of the same time. And then I was placed in Maggie Williams' office.
Question. Why did you want to work in the First Lady's office?
Answer. Because of my admiration for her and the work that she has done.
Question. Okay. Did you get any school credit for this internship?
Answer. I believe so.
Question. Do you remember how many credits?
Answer. Not exactly.
Question. Did you have to write a paper or report at the end of the internship?
Answer. I don't think about the internship per se. I think what I wrote—what I wrote was actually for the school paper, and I think it was more about student and political activism, but I don't remember exactly.
Question. And this was something that you became aware of while you were at American University?
Answer. The internship? Yes.
Question. I am sorry?
Answer. I knew there were White House interns before that, but I applied the fall of '94.
Question. The fall of '94. And you didn't begin until January '95. Is that when the internships pretty much started?
Answer. Um-hmm.
Question. And you said there was an application process.
Answer. Um-hmm.
Question. And then you met with a few people in the First Lady's office? Did you happen to know them before you met them?
Ms. AMERLING. You need to have allies.
The WITNESS. I am sorry. I knew a girl that interned in the health care war room. She told me about her internship, and she sort of helped get me the application and sort of showed me the ropes and how to apply and introduced me to some of the people that worked in the First Lady's office.

EXAMINATION BY MS. SAFAVIAN:

Question. And what was her name?
Answer. Suzy Pollack.
Question. She was also doing an internship when you were speaking with her?
Answer. She finished hers in the fall of '94.
Question. Who did she introduce you to at the First Lady's office?

Answer. I think she introduced me to Evan Ryan. She was Maggie's assistant at the time. I just went in and she sort of showed me around the office, introduced me to——

Question. Is this Ms. Ryan you are talking about?

Answer. Yes. Suzy Pollack introduced me to Evan Ryan, I think, and maybe Katy Button, who was Melanne Verveer's assistant at the time. The people that I initially had an interview with was Elisa Muscatine in speech writing. These were different—I think that actually went through a different person, Gabriel Bushman. I don't know if these are names you want or not.

Question. That is fine. I am interested in the process.

So you met with all these people and spoke with them?

Answer. Yes.

Question. So was Evan Ryan the only person you mentioned with whom you spoke within the First Lady's office?

Answer. I had an informal interview with Elisa Muscatine.

Question. Did she interview all the potential internship applicants?

Answer. I don't know what her procedures are.

Question. Did you interview with anybody else?

Answer. No, not formally. I spoke with Evan. I think she might have talked to me a little bit about what the responsibilities are in the Chief of Staff's office and what the interns do there. She was previously an intern and then was hired on.

Question. Was this a paid or unpaid internship?

Answer. Unpaid.

Question. And how long were you an intern in the First Lady's office?

Answer. I was an intern and a volunteer in the First Lady's office.

Question. At the same time?

Answer. No.

Question. Okay.

Answer. My internship, it started in January of '95, and ended sometime in April of '95, and I am not exactly positive on exact dates, but then once my internship ended, I filled out paperwork to be a White House volunteer. So I had a blue badge, and my badge went from intern to volunteer.

Question. Was it immediate, like you turned in one badge and they gave you another badge?

Answer. I imagine. I think so. I might have turned in the badge for the internship and then I went on the trip to China, and when I came back—it would have been fairly soon.

Question. Do you recall filling out the paperwork to become a volunteer while you were still interning?

Answer. I don't remember exactly when I did it. It was a fairly simple form. It was mostly contact information. I don't remember exactly when I filled that out.

Question. So if I ask you for a time frame, as for when you were a volunteer, can you give me one of those?

Answer. Yes. I was then basically a volunteer spring of '95—off and on, I think, until the following maybe June of '96. There were times when I was in between jobs and I would go back and volunteer and help out, or if I had extra time doing whatever job I was doing; just because I knew what to do there, I would go and help out.

Question. Let's go back. Let's stay with the volunteer.

Were you a volunteer in the First Lady's office?

Answer. Um-hmm.

Question. So you stayed with the First Lady's office?

Answer. Um-hmm.

Ms. AMERLING. When you say um-hmm——

The WITNESS. Yes.

EXAMINATION BY MS. SAFAVIAN:

Question. Did your job duties, responsibilities, vary at all from an intern to a volunteer?

Answer. No. The responsibilities varied depending on what was needed.

Question. And I assume when you were a volunteer, you also did not get paid?

Answer. Correct.

Question. So when you say "off and on," did you have like any set hours when you were a volunteer or set days you would come in, or how did that work?

Answer. There wasn't a specific schedule made out. I guess it was basically depending on my availability.

Question. So it could have been one day a week, or it could have been 5 days a week?

Answer. Yes.

Question. Did you have for yourself any set routine? Did you try to make it in so many days a week or anything like that?

Answer. No. It wasn't regimented like that.

Question. It was just random?

Answer. However my scheduled worked out.

Question. Okay. And when you are talking about your schedule, because you said you were a volunteer in and out with other jobs also, so it was pretty much whenever you had free time you would then volunteer in the First Lady's office?

Answer. Yes.

Question. So the other jobs took precedence?

Answer. If I had a responsibility to paid employment I had, yes, I was there.

Question. Okay. Going back to your internship, can you kind of describe for me what you did as an intern? What were your responsibilities?

Answer. Um-hmm. It varied. Mostly answering phones, opening mail; running an errand within the White House; dropping off something, say, to the Press Office or Correspondence Office; greeting White House staff or guests as they came in, whoever they had meetings with, anyone within the First Lady's suite.

I don't know. Sometimes getting lunches or beverages, that sort of thing. It sort of varied.

Question. Were you the only intern at the time?

Answer. No, no. There are always many interns.

Question. There were several others?

Answer. Yes.

Question. Was it like a set number of interns?

Answer. There were typically two—typically two interns assigned to Maggie's office when I was there, but it did depend on—interns were mostly students, so it would depend on their schedules if they were there 5 days a week or 3 days a week or off for breaks, that sort of thing.

There were other interns assigned to other parts of the First Lady's office, like her Press Office, Correspondence Office, Speech Writing.

Question. You were simply assigned to Maggie Williams' office?

Answer. Yes.

Question. So even with your hours for the internship, that was also pretty varied?

Answer. From January '95 to April, I was there pretty much 5 days a week.

Question. Full days?

Answer. Yes.

Question. Was that a requirement for getting credit in school, or was that just what was needed?

Answer. That is how it worked out. Since I wasn't going back to school, I wasn't taking classes, and I had that time available.

Question. You were not attending class at the same time?

Answer. No.

Question. Did you have an office or a desk or anything that was your area in the First Lady's office?

Answer. Not one that was specifically mine, no.

Question. Where would you normally sit or hang your hat, as the saying goes?

Answer. There is a coat rack when you walk in. I would put my coat there, and I would go and there were two desks that were available. Typically there were interns, and occasionally there were volunteers as well. So if the volunteers were there, usually elderly women, they would sit at the desk and answer the phone and open the mail. They would sort of have the interns wherever space was available to work, file, whatever was needed.

Question. So you wouldn't necessarily be sitting at a desk all day answering phones or correspondence?

Answer. No.

Question. You said this is kind of in the general reception area, like when you walk into the First Lady's office, it is a reception area. Is that generally the area you were talking about where you would spend most of your time?

Answer. Yes.

Question. Who else was in that area besides volunteers and interns?

Answer. Evan Ryan.

Question. That is where her desk was located?

Answer. Yes.

Question. Was there anyone else permanently located in that reception area?

Answer. No.

Question. And I guess if you could explain to me how close from where the reception area is to where Maggie Williams' office is?

Answer. They are connected by a door.

Question. So Maggie Williams, her office is right there?

Answer. Yes.

Question. Did you as an intern have a supervisor or have to report to anybody?

Answer. Evan was my supervisor. That is who I checked in with, who basically assigned the project.

Question. Was she the supervisor over all interns?

Answer. Over the interns in Maggie's office.

Question. Of course, that is what I meant. I am sorry.

What about over the volunteers? Was there somebody who kind of oversaw the volunteers?

Answer. Evan did in Maggie's office.

Question. So would Evan Ryan then be the one that every day would kind of tell you what needed to be done that day, or you would go to her when looking for something to do?

Answer. Um-hmm. Yes.

Question. Besides the First Lady's office, did you ever work out of any other location?

Answer. I helped out in the Press Office, I helped out in the Social Office. I helped out a little with whoever was working on Mrs. Clinton's briefing book, the Research office.

Question. Was this just a day here and there——

Answer. Yes.

Question [continuing]. If someone needed to be there to help out?

Answer. Yes.

Question. So it wasn't anything——

Answer. Regular, no.

Question. Right. As an intern, did you ever help schedule any events, any White House dinners or lunches with the First Lady?

Answer. Are you asking me if I scheduled those?

Question. Were you ever involved in doing anything like that?

Answer. I never scheduled any events, no.

Question. Who would have scheduled those events?

Answer. Perhaps the Social Secretary. She was pretty much in charge of the First Lady's social events.

Question. Would you ever at any time assist in preparing a guest list or helping set up, or—I don't know—anything?

Answer. I helped out with the Social office, yes.

Question. Did you ever assist anybody in scheduling events for DNC contributors or Clinton-Gore contributors to events in the White House?

Answer. No. No. The events that I helped out, I helped out an a state dinner. I don't know, I think I was making some calls for some women's tea thing. I can't remember exactly. But it wasn't fund-raising that I remember.

Question. Did you ever help plan any movies that they had at the White House?

Answer. No, I never got to go to those.

Question. That is too bad.

How about any of the photos with the First Lady?

Answer. What about them?

Question. Did you ever help plan any photo sessions with the First Lady?

Answer. I never planned anything for the First Lady. I helped out at whatever. I did help out at event where she was at, where the White House photographer may have been at.

Question. Were you involved at all with any of the—what are called now the "White House coffees" that Mrs. Clinton would have attended?

Answer. To my knowledge, those started after I left. I didn't know of any of those going on when I was there.

Question. Okay. And then you said, pretty much your job duties and responsibilities really didn't change once your internship was over and you became a volunteer?

Answer. No.

Question. They pretty much stayed the same?

Answer. Um-hmm.

Question. You mentioned earlier that you began your employment with Johnny Chung around the end of April, 1995.

Answer. Um-hmm.

Question. Is that correct, to the best of your knowledge?

Answer. Um-hmm.

Question. The time period you were working for Johnny Chung, from the end of April of '95 to July of '95, you were also a volunteer in the First Lady's office; is that correct?

Answer. I have a question for you.

Mr. ZACKS. Off the record.

[Discussion off the record.]

Mr. ZACKS. Can you read back the last question, Mr. Reporter?

[The reporter read back, as requested.]

The WITNESS. Yes.

EXAMINATION BY MS. SAFAVIAN:

Question. Your answer is yes to that?

Answer. Yes.

Question. If we can just discuss that a little bit, because I know you mentioned you were a volunteer in the spring of '95.

Answer. Yes.

Question. And your internship ended in April of '95.

Answer. Um-hmm.

Question. I am just trying to make sure I have a time frame.

Ms. AMERLING. When you say um-hmm, you mean yes?

Ms. SAFAVIAN. We have to make sure we get a verbal response.

If you want to explain that to me?

The WITNESS. Can you repeat that?

EXAMINATION BY MS. SAFAVIAN:

Question. I am just trying to get an understanding as to the time period from when you went from an intern to a volunteer in the First Lady's office, and when you first started working for Johnny Chung, if you can kind of give me a sequential of all that happened.

Answer. Okay. I would have started volunteering when my internship ended, whatever specific date in April that was; I don't remember exactly. My internship would have ended when I started employment for Johnny Chung, which was, I believe, at the end of April.

Question. So your internship would have gone from the beginning of January to the end of April. It would have been from like the second day of January to the end of April?

Mr. ZACKS. Just so the record is clear, Counsel, I think she has indicated she is not sure of the exact date in April, but she believes, to the best of her recollection, it was towards the end of April.

The WITNESS. Yes. Internships are roughly a semester. It depends on schools and dates. It is not, you have to be here from this date to this date.

EXAMINATION BY MS. SAFAVIAN:

Question. It is normally maybe a certain number of dates or hours or something for most internships? Anyway, you think it is pretty much from the beginning of January to the end of April?

Answer. Yes.

Question. You said you would have gone from that immediately into the volunteer program at the White House?

Answer. Yes, whenever the internship ended.

Question. So you would—while you were still an intern towards the ends of April, you had already filled out the paperwork necessary to become a volunteer; is that correct?

Answer. I don't know if I filled out the paperwork while I was an intern. I could have. I think my internship was supposed to go until the end of April. I was hired by Johnny sometime in April, so that cut my plans short of completing the internship scheduled to last through the end of April. I believe we went to China at like the last week of April, so that was sort of my first project in working for him.

It might have been when I came back from that trip that I decided I wanted to still volunteer in the First Lady's office and I might have filled out the volunteer paperwork then.

Question. So you cut your internship short, you believe?

Answer. I don't remember exactly what dates the internship was scheduled to run for.

Mr. ZACKS. Excuse me.

[Discussion off the record.]

Ms. SAFAVIAN. Back on the record.
Oh, will you read the last question back, please.
[The reporter read back, as requested.]
The WITNESS. I don't know exactly what dates.

EXAMINATION BY MS. SAFAVIAN:

Question. That is fine. Just give me what you can recall or your best recollection.
You mentioned that you went on a trip to China with Johnny Chung at the end of April.
Answer. Yes.
Question. I believe, going through some of the documents that you produced today, I did see a travel itinerary.
Answer. Yes.
Question. We don't have it in front of us right now, but was that the trip you took to China with Johnny Chung?
Ms. AMERLING. Was what the trip? Excuse me.
Ms. SAFAVIAN. The itinerary you produced this morning.
The WITNESS. That schedule was created in China, yes.

EXAMINATION BY MS. SAFAVIAN:

Question. Once we get it back, it will be clearer. That might have a date on it then.
Answer. Sure. I think I have plane tickets too that show. I think I got there a day or two before the Oklahoma bombing, because I remember that was on TV there. I was so surprised, but I was watching it over there.
Question. Okay. We will get back to the trip to China. But you believe, when you returned from your trip to China, that you then decided you wanted to become a volunteer in the First Lady's office, and that is pretty much when that started?
Mr. ZACKS. Counsel, just so the record is clear, I believe what she previously testified to was that she is not sure whether she filled out the volunteer forms while still an intern, but it is possible she did it upon her return from China.
The WITNESS. Yes.

EXAMINATION BY MS. SAFAVIAN:

Question. In either case, you believe you began to volunteer after your trip to China?
Answer. Yes.
Question. Did Johnny Chung know that you were volunteering at the White House while you were working for him?
Answer. I believe so.
Question. Did he have a problem with that?
Answer. Not to my knowledge, no.
Question. Let me ask it this way. Did you ask him if that was okay, if you volunteered at the White House?
Answer. I don't remember asking him for permission to volunteer at the White House.
Question. Did he encourage you to do that?
Answer. No.
Question. When you filled out the paperwork to become a volunteer, did you also have to include that your other employment was with Johnny Chung at AISI?
Answer. I don't remember. From what I remember from that form, it was fairly simple. The paperwork for the internship was very lengthy and complex, but I don't know if I got a simpler version because they already had all of my other background information or what.
Question. Did anyone else in the First Lady's office know that you were, while you were a volunteer, also working with Johnny Chung?
Answer. Yes.
Question. Who would that have been?
Answer. Who in the First Lady's office knew?
Question. Yes.
Answer. Evan Ryan knew I worked for Maggie—I mean, I worked for Johnny. Maggie knew. I know that those two knew for sure. I don't—anyone would have known, Melanne Verveer would have known. Liz Boyer. She was in research, so I don't know if she did. She did the briefing book.
Question. Nicole Rabner?
Answer. R-A-B-N-E-R.
Question. Where did she work?

Answer. She was Melanne's assistant.

Question. Where was she working?

Answer. Melanne Rivera is the Deputy Chief of Staff.

Question. So they are both right in the First Lady's office?

Answer. Yes.

Question. Okay. Anybody else who may have known?

Answer. Those are the people that may have known.

Question. Are these the only ones you spoke to about it?

Answer. Those are the ones I worked with most closely.

Question. Did any of the people you just mentioned have a problem with you volunteering at the White House while you were also working for Johnny Chung?

Answer. Not that was verbalized to me.

Question. Did anyone suggest that that needed to be checked out with the National Security Council or somebody else in the White House who needed to approve that?

I don't know what the process is.

Answer. My volunteer activities were approved. I didn't receive any hesitation or negative feedback from anybody while I was working there, if that is what you mean.

Question. Okay. Can you tell me when you first met Johnny Chung, if you can recall?

Answer. I don't know the date. It was sometime when he came into the First Lady's reception area. I don't know what he was doing at the White House, but he came into the office and the whole office was introduced to him, or whoever was there that day.

Question. And who introduced him?

Answer. I think Maggie did.

Question. And do you recall—she just what, took him around and introduced him to everybody or how did that go?

Answer. She came into the reception area, I believe she was going into her office. On her way into her office, she said something—he wasn't right with her, because she came in and said something about this—some big DNC donor, you know, the name is Johnny Chung, say hi to him, or something like that. It was sort of along those lines. I don't know if she was getting ready to go to a meeting or what.

Question. Was he kind of behind her, walking in the door?

Answer. He came in behind her, because I remember she came in first and said that to us, and then he came in after that.

Question. I mean, was it so much after that, that maybe he didn't hear her give that introduction?

Answer. No, I don't think so, no.

Question. So she said, you know, here is Johnny Chung, a big DNC donor?

Answer. It is just kind of like, I can't—I am not supposed to——

Question. Just generally.

Answer. Right. She said this guy is coming in, he is a big DNC donor. She said, his name is Johnny Chung. Just kind of letting us know who was coming into the office next.

Question. He was pretty much right behind her?

Answer. After she said that, then he came in. I mean, it was a flow. It wasn't like——

Question. It wasn't like she for warned you guys and said at 10 o'clock today we have this person coming in?

Answer. Not at all. It is like she was walking into her office, along the way, she told the people in the reception area, "This big DNC donor is coming in," and he was right there behind her.

Question. That was the first time you met him?

Answer. Yes.

Question. Had you seen him around the First Lady's office?

Answer. Never.

Question. I know it is hard to recall exactly when that was. Can you give me a general time frame?

Answer. My guess would be the end of March, early April, sometime around there.

Question. Okay. Was this also—if you know this, was this the first time that Evan Ryan would have met Johnny Chung?

Answer. I have no idea.

Question. Do you recall Ms. Williams introducing Evan Ryan to Johnny Chung?

Answer. It wasn't a formal situation. I couldn't even tell you who else was there. I couldn't even say for sure if Evan was standing there at that time. My sense is there were other either interns or volunteers, because I wasn't the only one there.

Maggie sort of came in, said it, and people were like shaking his hand and stuff. That kind of thing.

Question. Was he alone?

Answer. I can't remember that. I think that time he may have been, but I am not positive.

Question. Okay. So you shook his hand, he introduced himself to you?

Answer. Yes.

Question. Had you heard anything about him prior to Ms. Williams announcing him?

Answer. No, I had no idea who he was.

Question. What did you think of him, your first impression?

Answer. He was an Asian man that came into the office that apparently gave a lot of money to the DNC.

Question. Did he stay very long that day?

Answer. No.

Question. Do you recall?

Answer. No.

Question. Do you recall what he did?

Answer. No. Actually, I mean—yes, I don't know.

Question. So that was the first time you met him. After that, were there people in the office who talked about him? Did you start to hear more about Johnny Chung?

Answer. Yes. I mean, he was sort of, I would say, kind of an irritant to the people in the office.

Question. Why would you say that?

Answer. He didn't really do anything, but he just kept showing up. It is sort of like, you know, people would roll their eyes and say, oh, Johnny is here, or it is Johnny, or something along those lines. I mean, it wasn't anything, you know.

Question. Would he just appear, or like did you guys know he was coming over? Would he call first?

Answer. Well, he would have to get cleared in, so I wouldn't necessarily know how much advance notice other people had. I think I probably typically saw him—I never knew when I was an intern there when he was coming or not. He was just there.

Question. So it was always a surprise to you——

Answer. Yes.

Question [continuing]. When you would see him?

Answer. Yes.

Question. Did you have the ability to wave somebody into the White House?

Answer. No. Only staff members can do that.

Question. So Johnny Chung never called you and asked you to get him clearance into the White House?

Answer. No, no. I couldn't do that.

Question. Do you know who he would normally call to do that?

Answer. My sense is that he called a lot of people, like he made sure when he came in that he talked to as many people as he could. I mean, just from the entrance of the OEOB, getting to the First Lady's office, he always had to stop in every office and shake hands and kibitz and do his thing.

So I think he called the First Lady's office a lot, and I don't know if he would call Evan specifically or Maggie specifically or other people. I don't know.

Question. Okay. When somebody would call or get cleared to get into the OEOB, did somebody have to greet them at the door and say, bring them to the First Lady's office, or they just found their own way to the First Lady's office?

Answer. Johnny tended to find his own way.

If somebody was cleared in, are you asking in general?

Question. Start with general.

Answer. In general, if somebody is cleared in and, to my knowledge, if nothing shows up on their record, then they can just show their ID and get their appointment badge and walk in.

I think if something shows up on their record, then they would send one of us down to go escort them.

Question. What kind of things would show up that would require an escort?

Answer. I never knew exactly. I think it could be something pretty minor, like somebody has ever been—I don't know.

I don't know, but I remember asking one time, why did someone need an escort, because they have been here for meetings before and that sort of thing. I thought that is what I was told.

But typically, if you are cleared in, you know the room you are going to, you can just go.

Question. More specifically with Johnny Chung, did he require an escort or kind of found his own way to the First Lady's office?

Answer. I believe he typically found his own way. I don't know, I am not saying there were never times—he may have been escorted. I don't know—I can't recall specifically if it was like a necessary thing that he needed an escort, if it was like an ego thing.

Question. An ego thing?

Answer. I don't know.

Question. Like, for instance, he would prefer to have an escort?

Answer. It is not even—I mean, if there was—to send somebody out of courtesy, if you had that, an intern sitting there with nothing to do, let's say. I don't know.

Question. So you had been asked before to escort somebody, not necessarily Johnny Chung, but you had done that before when you were an intern?

Answer. I would go down and pick people up at the front door, yes. Or packages.

Question. Did you ever do that for Johnny Chung?

Answer. I don't remember specifically. Yet it seems like it. It is honestly hazy. There were times when he would come with other people. I don't know if at that point he needed an escort. I can't remember.

Question. Do you recall how soon after your first, very first meeting him, would you say that you then saw him again?

Answer. That I don't know. To give you an idea, it was sort of like, when he was in town, you saw him a lot. Then when he was out of town, he was out your hair kind of thing.

So I know that is not very specific, but that is sort of how he functions, too, or at least how he functioned then.

Question. You mentioned people started to think of him as an irritant.

Answer. That was my personal sense.

Question. Of what people were feeling?

Answer. If I am allowed to say what other people are feeling.

Question. That is your sense of what you thought they were feeling; is that correct?

Answer. Yes.

Question. Did you feel that he was starting to become an irritant?

Answer. Yes. He was annoying, definitely.

Question. Why so? Just because he kept showing up?

Answer. He kept showing up, yes. People had work to do, and he sort of seemed to want to sit there and talk or shake hands or be catered to or introduce you to someone, and everybody else was busy meeting these phone calls.

Mr. ZACKS. Off the record.

[Discussion off the record.]

Ms. SAFAVIAN. Back on the record. If at any time you want to take a break, just let me know.

Mr. ZACKS. Excuse me, off the record.

[Discussion off the record.]

EXAMINATION BY MS. SAFAVIAN:

Question. Back on the record.

We were just discussing everyone's feelings towards Johnny Chung because he kept appearing. I may have asked you how you felt about him, and if you want to just repeat that?

Answer. Johnny was a hassle. He tended to demand a lot of attention, sort of, even without asking for it. Without asking for it directly anyways. I don't know, I liked what I normally did in the First Lady's office with whatever project we were working on, and, you know, like things sort of stopped when, as things would with any character that walks in the office.

There were certain people that you just kind of stopped for and catered to; and when he was in town, he was one of them.

Question. Was that because you were told to do that, or that is just what happened?

Answer. It is more what happened. I mean, you know, we were trained to be very courteous to whoever called in, whoever came into the office, how we treated people—we represented the First Lady's office. So I used the manners I was trained to.

Question. Do you happen to know how Evan Ryan felt about Johnny Chung?

Answer. My guess would be similarly. Evan had a lot of work to do, being Maggie's assistant, and when Johnny came in, as when anyone would come in, she would be very courteous and stop and she would give them the attention that they required.

It is not like Johnny was somebody we were, like, excited to see, like, great, Johnny is in town this week. It wasn't anything like that.

Question. Did anybody ever complain to Maggie Williams or anybody about his constant interruptions or how everyone felt about him?

Answer. I don't know if any direct complaints to Maggie were made about him. It was sort of like the buzz in the office.

Actually, other people could come in and out. They could go back and do their work. It was sort of that main reception area that a few of us couldn't really leave quite as easily or say we had meetings to go to, being interns.

Question. Did you personally ever complain to anybody about him?

Answer. About like how frequently he showed up? No. I didn't do that about anybody that came into the office.

Question. Okay. What would he normally do when he came to the First Lady's office?

Answer. I don't know exactly. If he was with people, he would come in the reception area in the First Lady's offices, people like coming into it. There are huge, colorful photographs of the First Lady from whatever trips or event she has been at, and they love coming in and looking at the photos and talking about them. And there is a very large conference room that is also filled with these photos, and he would come in and show his guests around and show them photos and that sort of thing.

That is what I basically saw. That was the area that I functioned in.

Question. And did he normally always have guests with him?

Answer. He did both. He would come by himself or he had guests.

Question. Who would he—was there anyone in particular in the First Lady's office who he would kind of go right towards and speak with?

Answer. Ideally, he would probably want to see Maggie, but she was not always available. Again, this is my guess; I mean, because if he is going to go to someone, he is going to want to go to the top. Maggie is the top person in Mrs. Clinton's office. So I think Evan would get stuff, being like the next one in line, always sort of stationed at her desk there. Him knowing that she has access to Maggie.

Question. How did you get to know him pretty well?

Answer. From his visits to the First Lady's office. He would talk about trips that he had taken or whatever, and so I sort of sat there and listened to him, whatever story, whatever pictures he was showing. He was really big on pictures.

Question. He would bring in pictures?

Answer. I think so. I think that is where I saw—he brought this one delegation in, I cannot remember if I saw—I saw pictures of his trip to San Francisco with some Asian delegation, and I don't know if he brought those into the First Lady's office.

I remember a lot of people that he brought to San Francisco, or at least some, were a group he brought to D.C.

Question. So he would tell you about his trips. He would spend a lot of time talking to you?

Answer. To whoever, yes.

Question. Okay. Did he ever tell you then what his business was, what he did for a living?

Answer. Oh, yes.

Question. What did he tell you about that?

Answer. He was very proud of his, you know, "super fax machine" that can simultaneously fax millions of copies around the world. This is paraphrasing, but this is sort of the gist of what he would talk about. He would start name dropping of all these people that were his clients, Governor of California, the guy that owns Wendy's, whatever. He might have brought in some of the, I don't know if he brought in these booklets.

Question. The AISI brochures?

Answer. Yes. I don't think that was in it then, the pictures. He is, like, very proud of being this engineer from UCLA, who used to own seven computer stores, to build this machine, how he went close to bankrupt and had to like sell all these stores just to believe in his dream; and his wife was saying, you are crazy, you can't do this, but he believed in his dream and finally got this machine to work, and has this super fax machine.

Question. I know you said the first time you met him, you believe was at the end of March, possibly April, of 1995. Do you recall Johnny Chung bringing a delegation of Chinese businessmen to the First Lady's office?

Answer. Yes.

Question. That was—I can give you the date—that was March 9th, 1995.

Answer. Oh, was it?

Question. Does that help you at all determine when you may have first met him?

Answer. I would guess—I think the first time I met him, he was by himself, is when he came into the office. Soon after that, I remember him coming in with this delegation.

Question. So that couldn't have been the first time that you met him?

Answer. Not with the delegation. Honestly, it could have been like a morning and afternoon thing. It could have been like a week-to-week thing, a next-day thing. I don't remember.

But I do remember the first time seeing him, Maggie saying, this is a big DNC donor, and then I remember after that, this delegation coming in.

Question. Could it have been the next day?

Answer. It could have been.

Question. What do you recall about this Chinese delegation—did you meet the delegation?

Answer. Yes.

Question. Who introduced them to you?

Answer. Probably Johnny. Again, it was not any sort of formal event. I remember them all standing there. None of them spoke English, to my knowledge. Meeting them, shaking their hands. I imagine all the people in the office did, too. I remember them going through the conference room looking at the pictures.

Question. Do you recall how long they stayed in the First Lady's office?

Answer. No, but not long. Most of his visits were sort of like the superficial tour kind of agenda, lack of agenda. There is no agenda there, to my knowledge.

Question. Did the delegation give you any of their business cards?

Answer. I don't remember them doing that then. It seemed like a bunch of old men looking around. There was one young guy in it, and that was it.

Question. Okay. Do you recall them giving their business cards to anybody at that time?

Answer. I don't recall. I don't think so. It seemed more like once we got to China, people were dealing cards like it is Vegas.

Question. Are you aware that the Chinese delegation that day, March 9th, received a tour of the White House, had lunch in the White House mess, and had their photos taken with Mrs. Clinton?

Answer. They had that that day?

Question. Yes.

Ms. AMERLING. Counsel, have we established that it was March 9th she is discussing?

Ms. SAFAVIAN. Well, I have. I mean, I can show you a record that shows he was there on March 9th and an L.A. Times article that discusses March 9th as the day.

The WITNESS. I don't remember what day. Johnny certainly brought—I remember specifically, though, this initial delegation with approximately 10 people in it, 10 men in it. But I don't remember the date.

EXAMINATION BY MS. SAFAVIAN:

Question. Let me show you a photo that is in the AISI brochure, one of the brochures you brought this morning. It includes a photo of the Chinese delegation that I am speaking about, with the First Lady. All their names are listed at the bottom.

Answer. Yes.

Question. It does not provide a date.

Ms. AMERLING. Let the record reflect another person has entered the room. Can we hold on the deposition?

That person has now left the room.

EXAMINATION BY MS. SAFAVIAN:

Question. Is do you recall, is this the same Chinese delegation we are speaking about?

Answer. I believe so. And then—I take that back, because I know one guy speaks English.

Question. Who would that be?

Answer. I don't know any of their names. The second one from the left.

Question. Okay. In the picture?

Answer. Yes.

Question. Hmm, it is kind of hard to tell exactly who that would be, because he doesn't seem to list them.

Answer. He was, to my knowledge, the translator.

Question. He is the translator.

Answer. I don't know if they didn't put him in. Is that Vice Premier Lee, the guy to his right?

Question. Right next to Hillary's left on her picture?

Answer. On her right.

Question. You said Li?

Answer. I thought Vice Premier—anyway, he most likely is his translator. But I don't remember talking to any of them. It was more like walking into the First Lady's office, shake some hands, show some pictures. I didn't particularly know that they had a picture taken with the First Lady. That is not the reception area.

Question. That is not the reception area?

Answer. The First Lady's office.

Question. The gentleman that you identified or were trying to identify standing next to Mrs. Clinton, let me show you a document, EOP 029612, and tell me, it is just a black and white, if this is you believe the same guy you are speaking about in the color photo with Mrs. Clinton?

Answer. I mean, it looks similar.

Question. Okay. Just to identify the name on the photo, is Zheng, Z-H-E-N-G, and I will spell the last name, H-O-N-G-Y-E. We can mark this as Exhibit Number 1.

Ms. AMERLING. This being the EOP document?

Ms. SAFAVIAN. That is correct.

[Ratliffe Deposition Exhibit No. GR–1 was marked for identification.]

[Note.—All exhibits referred to can be found at end of deposition.]

Ms. AMERLING. So the record is clear, can we give the photo an exhibit number as well?

Ms. SAFAVIAN. We will have to get a copy made of that.

Mr. ZACKS. Okay. Do you want it now?

Ms. SAFAVIAN. We can do it at the end.

Ms. AMERLING. We can do it at the end.

Ms. SAFAVIAN. The group photo of Mrs. Clinton will be Exhibit Number GR–2.

[Ratliffe Deposition Exhibit No. GR–2 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. So, Ms. Ratliffe, these photos I am showing you right now, GR–1 and GR–2, this is the Chinese delegation we were previously speaking about, correct?

Answer. Yes.

Question. And did you answer before that you recall that they had a White House tour, lunch in the White House mess and a photo with Mrs. Clinton?

Answer. I wasn't aware specifically. It doesn't surprise me, but I didn't know that for sure.

Question. Okay. So that day, you as an intern didn't have to do anything with the delegation to get them from one place to the next or assist in anyway?

Answer. No, not that I remember. I remember meeting them in the office, definitely, in the First Lady's reception area.

Question. Do you recall Evan Ryan or Maggie Williams discussing this delegation at any time?

Answer. No.

Well, at any time? There was talk of Johnny and his delegation. Anything specific, I don't remember them saying anything specific about them.

If you want to ask me something else about it?

Question. What do you mean by, there was talk about the delegation?

Answer. I mean, Johnny and delegation. Johnny always had some delegation going on. That is how he used it, anyways.

Question. So you don't recall any specific discussions or conversations about this Chinese delegation, the photos you are looking at?

Answer. No. No.

Question. Okay. Do you—how many times that day did you see Johnny Chung and the Chinese delegation?

Answer. All I remember specifically was in, like, the First Lady's reception area; it is connected to her conference room. I don't know.

Question. How many times do you recall seeing them that day?

Answer. One.

Question. Just one time?

Answer. The delegation. Johnny came back, and I don't know if it was later that day—what day of the week was March 9th? Was that a Friday, by any chance?

Question. I believe it was a Thursday.

Answer. Because Johnny came back at one point and he tried—he wanted to get them into the President's radio address. I don't know if it was like later that day or the next day or what. A radio address would have been Saturday. I remember he was like hustling to try to make this happen.

Question. So you recall him coming back that same day, trying to get them into a radio address?

Answer. I don't remember if it was that day or the next day. It was after this delegation had been brought in.

Question. Let me just show you, these are WAVE records. Have you ever seen WAVE records before?

Answer. Not like this.

Question. What I have handed you is the year 1995, and I turned to March of 1995 for you. If you will notice, it shows those dates in the—actually, I am sorry—in the first column on the left.

Ms. AMERLING. Which page?

Ms. SAFAVIAN. EOP 8683, and it shows that Johnny Chung entered the White House on 3–8–1995, he was requested in by Bailey, and he visited Bailey in room 174. Do you see that? That is the second line.

Answer. Yes.

Question. First of all, do you know who Bailey is?

Answer. No, I was just wondering that.

Question. And then you see the next entry is 3–9, and it shows that he is requested in by Ryan, and he visited Ryan in room 100.

Answer. That is the reception area.

Question. And if you look further, it looks like—well, according to these WAVE records, he entered the White House on 3–9 two times. If you look further down, there is another 3–9 entry, again requested and visited Ryan?

Answer. Yes.

Question. The next day right under that there is a 3–10 entry.

Answer. Yes.

Question. You see it is requested by and visited Tarmey. Who is this?

Answer. That was Marge Tarmey. She was another one of Maggie's assistants. She sat in Maggie's office.

Question. Does this help refresh your recollection at all as to when he may have come back, trying to schedule this radio address?

Answer. Not particularly. Like Johnny just was there a lot. Like he kind of bopped in and out. It wasn't ever a set thing; it wasn't ever scheduled. I never really knew ahead of time. But I remember him wanting to get this delegation into the radio address.

Question. Did he speak with you about that?

Answer. Yes.

Question. What did he ask of you?

Answer. I don't know if he asked me specifically if I could help him get in. He was talking about wanting to get them into the radio address, and I think that was the first—I knew the President gave his radio address, but I didn't know people could go in and watch it.

I think he said something about wanting pictures, because then they would get pictures with the President, and I didn't know that that was part of radio address procedures either. I think I told him that—I would have said, I am certainly not the person that can get you into that. He said, oh, forget about it; and he sat and like made some phone calls, I think, right there, there is like a little table and chairs, and I don't know exactly who he would have called to try and get him into the radio address.

Question. Did he mention anything further once he got off the telephone?

Answer. No.

Question. He didn't mention, oh, never mind, I have taken care of it?

Answer. Oh, I don't remember exactly. I knew—I remember knowing that he had succeeded with making this happen. I don't know if it was—I don't think he found out right then, so I don't know. I don't know if he came in the next day or something, and if I would have said, oh, did things work out for you at the radio address; and he said, yes.

But it is not like he made a phone call, got ten foreign businessmen cleared in, all set, ready to go for a radio address, and hung up the phone and said, yes, I took care of this.

Question. That didn't happen?

Answer. No.

Question. Did he speak with anybody else in the First Lady's office, to your knowledge, about trying to get them into the radio address?

Answer. I don't know about that. Not to my knowledge.

Question. Do you know whether or not he did get into the radio address?

Answer. Yes, to my knowledge, he did.

Question. How do you know that?

Answer. Because I think he told me that he got in. Like I said, afterwards he said it worked out. But I think he told me before he actually went to the address. That is why I was asking if March 9th was a Friday, because I remember he had like a short time. He was trying to make this happen and was kind of nervous—I don't know if that is the right word, but very "anxious" to get his delegation in to meet with the President.

Question. And you said that radio addresses are held on Saturday?

Answer. Saturday mornings.

Question. If you turn to the next page in the WAVES that I gave you, 005038, it is a little harder to read, but you can make out the seventh entry down, it shows Johnny Chung visiting POTUS, which stands for President of the United States. It shows that the date is 3–11, and it was requested in by Crawford, and it is in the West Wing, "WW."

That is 3–11, that would be a Saturday?

Answer. Yes.

Question. So 3–9 would be a Thursday. Does that help you then?

Answer. With what?

Question. With trying to figure out the time period? You were wondering if it was a Friday?

Answer. Apparently it was a Thursday.

Question. Does that help you at all with when you believe Johnny Chung came back and talked to you about the radio address?

Answer. No. If he was only there on Thursday, then it must have been—actually, did he come in——

Question. He was in on the 10th. If you turn to 008663——

Answer. He was in the previous day?

Question. Tarmey, requested by Tarmey, and visited in room 100?

Answer. It could have been then. Did he come in after the radio address?

Question. The previous page also shows that he was in 3–13, 3–14?

Answer. So he could have told me then too. If I had to guess, it would have been that he told me before.

Question. He would have told you before he actually went to the radio address?

Answer. That it worked out.

Question. And why? Any particular reason why you believe it was before?

Answer. My sense that he was—I remember him, I remember the chair he was sitting in, and the fury, trying to make these phone calls and get the delegation in. Then he hung up the phone, whatever. My sense is if I would have seen him again—soon, before it happened—I would have said, oh, did things work out—sort of follow through on any project I would have been dealing with.

And I thought that he told me that it did work out, and I seem to remember it being before, as opposed to after.

Question. Okay. That is fine. Did he say anything further to you besides, it worked out, or did you ask him anything that you recall?

Answer. Not that I recall.

Question. That is pretty much most of the conversation that you remember?

Answer. Yes.

Question. Okay. Did he happen to mention to you how he got into the radio address?

Answer. I think he did. I think he might have told me who he called, and I can't remember exactly. I know he worked with, or I know that he tried to work with Ann McCoy, who was sort of—she is the White House visitor's something or other, and she would show people around, including him.

Question. She would give tours of the White House?

Answer. Yes. So I don't know if it was Ann McCoy that he worked with on that or not, but she seemed like to be another point person he would try to hook up with to try to show his people around.

Question. Do you recall if he would have mentioned that he contacted somebody at the DNC?

Answer. I don't know. Johnny would always talking about all of his friends everywhere, and he is a big name dropper. So it is kind of a blur whenever he would. I don't remember.

Question. That is fine.

Ms. SAFAVIAN. I would like to mark for the record the WAVES records, years '94, '95 and 1996 as GR–3.

[Ratliffe Deposition Exhibit No. GR–3 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Did anyone else in the First Lady's office ever speak about the delegation getting into the radio address?

Answer. I think afterwards I heard talk about it.

Question. Do you recall at all what you heard?

Answer. As far as him getting into it? I mean, it is not——

Question. Anything, if there was anything you recall about discussions held in the First Lady's office about the delegation getting into the radio address.

Answer. Not about getting into the radio address. The photos that were taken during it were, to my knowledge, immediately released.

Again, I am not positive on all of this. I seem to remember that the NSC had hesitation about releasing them, and this might have been like more than a month later and they hadn't gotten them, and Johnny wanted the pictures. So I think there was like talk about—I don't know if Johnny was calling the First Lady's office, bugging them, I want these pictures, I want these pictures; and there was like talk about that sort of thing.

Question. Let me show you another exhibit, this is an April 5th, 1995, letter from Johnny Chung to Ms. Williams, the Bates Stamp is JCH15013. If you will just take a quick look at that.

Answer. All right.

Question. Do you recall ever seeing this letter before today?

Answer. No.

Question. Were you aware that Johnny Chung had contacted Maggie Williams about trying to get these photos?

Answer. I don't know that I knew that Johnny contacted her specifically. I know that he was—in his flurry, his anxious flurry of trying to accomplish whatever he was doing, I seem to remember him making phone calls to lots of people—like, I want these pictures, I want these pictures.

Question. Did Maggie Williams ever ask you to look into this issue for her?

Answer. Me to look into the photos? No.

Question. Okay. Let me mark this letter as GR–4.

[Ratliffe Deposition Exhibit No. GR–4 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. I am going to hand you some phone message slips, if you would take a look at those.

Answer. Yes.

Question. If you look at the first message slip, EOP 059024, it is addressed to Evan, dated 4–3, and on the prior page—it is hard to read—it gives the time period, and the year is 1995.

Answer. Yes.

Question. It shows that he called on 4–3 around 4:50, and in the message at the bottom of the message slip it says, it looks like "Re: Pictures. (Actually he called for Gina, who wasn't here, and then he asked for you.)"

Answer. Um-hmm.

Question. Did you ever, did Johnny Chung ever contact you about these photos?

Answer. I remember—I don't remember. I will tell you, what I do remember, first, was when this was still during my internship, but when I actually started working for him, he still hadn't gotten these photos. So right before—I had accepted a position for him, and we were going to be leaving for China, and he was going nuts to get these photos for the trip; and it was at that point then—no, I don't think I was actually in the First Lady's Office then. I don't know if I would have called Evan saying, Johnny wants these pictures, or can you tell us about that, that sort of thing.

Question. Are you talking about, after the fact, once you started working for him?

Answer. Once I started working for Johnny. I was in D.C., he was in L.A. I was getting ready to fly to L.A. before we left for China, and he wanted me to come with

these pictures. And I think, I don't know if he had been calling DNC folks to try and get any leverage or whatever, but nothing seemed to be budging.

Again, I don't know. It seemed they were holding on to them for whatever reasons, national security. But then I did end up picking up the photos from—this is not when I was an intern, because I remember taking a cab and running into the West Wing to pick up this package before I left for L.A.

Question. Do you recall when that was?

Answer. It would have been right before we left for China, which should have been towards the end of April.

Question. Did you—if you look at—actually, let me finish with this document first.

So you were still in the White House doing your internship on this 4–3 message slip?

Answer. To my knowledge.

Question. It does appear he tried to contact you about these photos?

Answer. Yes. Johnny would—well, I don't know—I don't know that he was necessarily calling me for these photos. He could have—I don't know when we exactly had started talking about my potential employment. So I don't know if he knew I could be reached there. Because there was a time span after he offered me the job, that I said I wanted to think about things.

I don't know if he was calling to get in touch with me about that or what exactly. So if he was calling regarding the pictures in general, and it is a side note that he was calling for me too——

Question. So you don't personally have any personal recollection that he called you about the photos?

Answer. That I was some sort of contact person about the pictures, no.

Question. If you look back at GR–4, the Maggie Williams letter that Johnny Chung wrote, it does mention in the letter, in the first paragraph, a couple of sentences down—I had it; in the next paragraph—"I am going to China next week and I do need to bring those pictures with me."

Does that——

Answer. But this letter is April 5th—the next week—I really thought I was in China sometime around April 25th.

Question. Once we get that—perhaps we have gotten it.

Answer. That is when I went to L.A., the next day.

Question. You are looking right now at a Tops International Travel itinerary, one of the documents that you brought with you today?

Answer. Yes.

Question. And it shows an April 12th date. It shows you leaving L.A. and you were going to arrive the next day in Tokyo, on April 13th, 1995.

Answer. That is when it would have been.

Question. That refreshes your recollection as to when it was?

Answer. Yes.

Question. Is that a yes?

Answer. My recollection was, for some reason I had the 25th in my head. That is definitely when I went to China.

Question. Okay. I was going to say, there are two itineraries here. The second one actually has your name on it. The first one has Johnny Chung's name on it. The second one says Gina Ratliffe. The two of you traveled together to China?

Answer. On the same flight, yes.

Question. And it looks like you left, then, April 12th and you returned April 25th?

Answer. Maybe that is why that date sticks out.

Question. That could be. Why don't we——

Ms. SAFAVIAN. First of all, I would like to mark the message slips as Number GR–5. Then I would like to mark the itinerary travel slips from Tops International Travel, the one for Johnny Chung as GR–6 and the one for Gina Ratliffe as GR–7, just so we don't get confused.

[Ratliffe Deposition Exhibit Nos. GR–5 and GR–6 were marked for identification.]

[Ratliffe Deposition Exhibit No. GR–7 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Now that we have established that you left L.A. to go to Tokyo on April 12th, does that help you at all place when you may have picked up the photos?

Answer. If I left on the 11th, I probably would have gotten them on the 10th.

Ms. AMERLING. I think it was the 12th, according to this itinerary.

The WITNESS. That I left for L.A.?

Ms. AMERLING. Actually, my copy is folded.

Mr. ZACKS. I think it is the 12th, leave Los Angeles.

The WITNESS. So I probably went to L.A. on the 11th, and I could have either picked them up on the way to the airport—I remember taking a cab there.

EXAMINATION BY MS. SAFAVIAN:

Question. To——

Answer. The White House.

Question. Let me show you some other documents that may help us out with the time frame.

Answer. I don't know if they put that on my credit card.

Question. If you look at the bottom one, JCO2932, the reimbursement check request, it shows it is dated 4–4–95, it just shows the amount of $398, reimbursed to Tops Travel; and then in the regarding line, it says Gina Ratliffe's air ticket, LAX, back and forth to Washington, D.C. Perhaps this is when they paid for your ticket, on April 4th, '95? I know you don't know. But if you look at the next document, which is JCO2845, that appears to be dated April 11, 1995. That has you going from Washington National to Chicago O'Hare and then to L.A.

Answer. Okay.

Ms. SAFAVIAN. And why don't I mark the reimbursement request as GR–8 and the United Airlines passenger receipt ticket showing April 11 as GR–9.

[Ratliffe Deposition Exhibit No. GR–8 was marked for identification.]

[Ratliffe Deposition Exhibit No. GR–9 was marked for identification.]

Ms. SAFAVIAN. GR–9 will include JCO2845 through 2846 and 3163, which is just another copy of that passenger receipt; and at the bottom it has a request, it looks like for petty cash. It shows once again the airline ticket and the amount.

The WITNESS. Okay.

EXAMINATION BY MS. SAFAVIAN:

Question. We can establish then you left Washington on April 11?

Answer. Yes.

Question. And then left out of L.A. April 12th?

Answer. Yes.

Question. And then returned from Japan—I am sorry, from China, on April 25th?

Answer. Yes.

Question. If you look down at the next document, it is JCO2847, it looks like, and the one after that, 2848—and I have also included another copy that combines the two, 3164—you received from petty cash it looks like $80 reimbursement on 4–11, and it says, for visa to China for Gina?

Answer. I don't know that I received that reimbursement. I remember him going with me to get this.

Question. Johnny Chung?

Answer. I think so, to get the visa. I don't know that my—the same for these—I mean, I don't remember handing someone $80 to get my visa.

Question. Do you recall going to get your visa?

Answer. Oh, definitely.

Question. Does Document 2848 establish that you picked up your visa?

Answer. I got it that same day, I think. Yes, I had to, because we were leaving the next day.

Question. And you believe Johnny Chung went you to get that?

Answer. I don't know if Art Liang went too. I don't know if somebody else from his office might have gone too.

Ms. SAFAVIAN. I will mark those three documents as GR–10. That will be 2847, 2848, and 3164.

[Ratliffe Deposition Exhibit No. GR–10 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. The last document I handed you shows just your passenger tickets with a date of April 25th. It shows you going back to Detroit. I believe the one below that is LAX to O'Hare and——

Answer. I probably came home after.

Question. After your China trip you made a stopover?

Answer. I went from Tokyo to L.A. to Detroit.

Question. It also shows at the bottom a check made out to Robert Ratliffe. Who is that?

Answer. My father.

Question. It was made out on June 1st, 1995 for $1,709. It is at the bottom for reimbursed air ticket. Did you pay for—originally pay for your trip?

Answer. I must have. I must have. I must have been using my parents' credit cards.

Ms. SAFAVIAN. Okay. Why don't we just mark that as GR–11.

[Ratliffe Deposition Exhibit No. GR–11 was marked for identification.]

The WITNESS. Either that, or they gave me the money. I don't know.

EXAMINATION BY MS. SAFAVIAN:

Question. Your parents?

Answer. Something. The check was made out to him.

Question. Did you use any of your contacts at the White House to get these photos for Mr. Chung?

Answer. No. That is not—I wasn't actually the one that got the go-ahead. I mean, I am sure I must have asked Evan, I would imagine, though I don't recall a specific conversation of, we are leaving for China, can you? Because I sort of moved over to being his assistant, I am sure I would have tried to handle that responsibility.

Question. The responsibility of getting the photos?

Answer. Of getting the photos, right.

I think I remember being kind of irritated, this is like my first job out of college, my first job is to like pick up some photographs, and this is like the NSC is involved in it. But it wasn't like Evan was like, okay, Gina, since we know you, we will give them to you. It was a phone call from Johnny that I got that said, okay, you can pick up the photos from—who is it, Kelly Crawford? Is that Crawford's first name?

Question. Is there a Kelly Crawford who works——

Answer. In the Photo office?

Question. She worked under Nancy Hernrich at that time in the President's office.

Answer. Oh, really? I don't know. I remember going into the West Wing and using the little phone or Secret Service or someone, and she came down and she handed me this package of photos.

Question. Kelly Crawford?

Answer. I think. I think so. I didn't know her even from working at the White House—like I knew the name, but I didn't know her. I remember a girl came and gave me this package, but it was because Johnny had called me, I think at my apartment in D.C., and said, go pick up the photos, and you can get them from so and so and bring them.

Question. And do you recall if it was like a day before you left for L.A.?

Answer. It seemed to be right before, yes.

Question. So it was pretty much already taken care of, you just had to go pick them up. You didn't have to make any phone calls to get the photos?

Answer. Like I said, I might have asked Evan or like asked some people, you know, what is up with the photos? And I think—because, again, all of this is right around the time of like going from intern to working for him.

So I know, when he was trying to get into the radio address, I was definitely an intern, so hearing all of that talk. And then I remember the situation of him trying to get the photos, and not being able to, and NSC holding on to them. I remember talking to Liz Boyer.

Question. Boyer?

Answer. Boyer. She was a friend of mine, but she worked on briefing book, and I think it was her that told me about the NSC situation. Again, I am not positive. But I remember talking to her about it.

I don't remember if she is the one that told me the NSC is holding on to them, and something about the President was worried about—or wanted them checked out or something. But I remember talking to Liz about that.

And then I am sure I would have tried, once I started working for him, if he wanted me to get these photos. It was not like I was calling the Photo office or I was calling Kelly Crawford or the DNC or anywhere else saying, what can we do to get these photos? The only one I would have asked would have been Evan or like, what do you—yes.

Ms. AMERLING. When you say "would have," you are speculating about what you would have done?

The WITNESS. Yes. I honestly don't remember specifically. Seeing some of this stuff, like I completely forgot I went home after the China trip. So seeing some of this is jarring some of it.

I totally forgot about Irene, which was like Johnny's assistant in L.A., who was like trying to do stuff for him too.

Yes, I don't remember placing a phone call to Evan saying, can you help me get these photos or what is the deal?

EXAMINATION BY MS. SAFAVIAN:

Question. You don't remember?

Answer. I don't remember a specific conversation, no. I mean—no.

Question. Okay. Did Johnny Chung ask you, do you recall him asking you, you know, are there any efforts you could make to help me get these photos? Did he ever request you to help him?

Answer. I would imagine so. What sticks out in my mind more is his anxious flurry to get these photos, and it was similar to his anxious flurry to get into the radio address. I don't remember a specific—with the radio address, I think he might have even said, can you help me, or just forget it, I can make a phone call, that kind of a thing.

I don't remember if with the photos, he definitely wanted me to pick them up, to bring them to L.A.

Question. He was already in L.A.?

Answer. Yes, he was already in L.A., and I was in D.C.

Question. You mentioned he was in a big flurry to get these photos?

Answer. Yes.

Question. Do you know why?

Answer. This was very important. Who knows what ego trip Johnny was on, and who knows what he was trying to prove to these people over there? But this, from my understanding, was going to prove to whoever we were going to meet in China that Johnny was tight with the President of the United States and Johnny can get people pictures, and, you know, more of—much more of a superficial thing than any sort of real power or significance.

Question. Did he tell you he needed these photos, it was important to pick these up if you came to L.A.?

Answer. Yes. Yes. Yeah, he definitely had to have these photos before we left on this trip. I was kind of like, had the attitude of, I am more relaxed anyways, but you know, if the NSC is not going to give them to you, you aren't going to get them.

I was kind of surprised he got the photos then, because it seemed like he had been trying to get them for so long, and it wasn't happening; and then all of a sudden, I got this phone call to go pick up the photos. So I was like, okay, it came through.

Question. You didn't ask him how it happened to work out or anything?

Answer. No.

Question. Okay. Let's backtrack a little bit.

Can you tell me, how did Johnny approach you or make an offer to you to work with him?

Answer. It was at the White House. One of his—I think he might have had people with him, but they were always or typically non-English-speaking people, so he could kind of do his thing anyways. And he was talking about that he was making another trip to China, and this China thing was a big deal because it was also before the World Women's Conference and before Mrs. Clinton had said that she would go.

So Johnny said to me, you know, like I am planning another trip. I am starting to come back and forth from L.A. to D.C. a lot more, and I need an assistant in D.C., you know, when is your internship over, you know, are you looking for a job, that kind of thing.

And it sounded really interesting, and we talked more about what the job would involve, and that is sort of how it all came about.

Question. Do you recall what he said to you about what your job would involve?

Answer. It didn't all happen in one conversation, but as the conversations went on, he explained that he wanted to—Johnny felt that he had an accomplished all of this financial success, and how he now wanted to give back to the world and wanted to start this like peacemaking—he called it "bridge-building"—mission between China and the U.S., and how he wanted to be this messenger of peace.

So what I would be helping him with would not really be an assistant with what he does with his fax machine stuff, but it would be whatever political involvement—what he, I realize now, created for himself—so when he would bring delegations over, he would always put them up in the J.W. Marriott Hotel and take them out to different restaurants and show them around, and he was having to be tour guide, plus Mr. Bigwig, too. So basically he wanted to be able to hire someone that would make dinner reservations and find out what is going on around town, and be there to kind of like show these people around and that sort of thing.

The reason why he told me he wanted me to go to China was because he wanted me to go and learn more about the culture and how—he is like, you will see how well you are treated over there, this is the kind of respect and treatment they will expect when they come here. He is like, I am planning this trip, so I think it would

be a really good thing for you to come to see what their culture is like, that when you show up, there are flowers and that sort of thing.

Question. So he mentioned the China trip when he was making the offer to you?

Answer. Yes.

Question. You hadn't accepted at this time?

Answer. No. No. No. That was sort of like the lure.

Question. How many times did he approach you about this job? You said it was more than one discussion you had with him?

Answer. Yes. My sense is, he must have been in town, and probably stopped by the White House. I mean, I want to say daily, but who knows if it was in one day and not another day or whatever.

He would talk about China and how wonderful her people are and how great it is over there and you have to see it, and what great work could be done here with this bridge-building process and how, you know, he was trying to get people from here to go over there. And so I would say a couple of conversations about it.

Question. Do you know what type of time frame we are talking about?

Answer. It all—I mean—fairly quickly. I was a little off on my weeks, because I thought it was like the end of April. So, what? The delegation first came March 9th and I was on a trip to China April 11.

Question. That is correct.

Answer. All within a month, basically, then.

Question. Okay. Were you surprised he approached you about a job?

Answer. Yes. I mean, I didn't have plans for a job right after school, and wasn't exactly sure what I was going to do. But then this came along.

Question. Do you know why he approached you in particular?

Answer. No. He said that he liked the way I handled things in the First Lady's office. He thought I had a professional manner, and I was there more than like the—the other interns at that time were not full-time, like they would come in a couple of days a week, so I don't know—in between their classes and that kind of thing.

So I don't know if he was just more used to seeing somebody there as opposed to the others, if I had more to do with him because of that. Then the other people he would have been in contact with a lot were the old ladies that were there all the time, too. So it was like me or them in a way.

Question. Did he offer anybody else a job that you know of in the First Lady's office?

Answer. Not that I know of.

Question. Let me show you one of the documents that you brought with you today. It looks like it is a March 21, 1995, letter that you sent to Johnny Chung.

Answer. Yes. Oh, yes, the other part about the job that we discussed, because he was asking me about what I was interested in and what I wanted to do with the job. The research project that I had worked on was all on how to include young people in the political process, I was real into the youth vote, rock vote, MTV and all that stuff.

What he told me is, I am looking for an assistant, it is not going to take up that much time. I basically need an assistant in Washington, so when I come to Washington, you would be there. In your off time, you can work on your youth vote stuff. Basically when I am in L.A. or China, or whatever, you can work on the side stuff. So this was a letter that I wrote to him after I had accepted the job and told him I was excited to go to China.

Question. By this date, March 21st, you had already accepted the job offer, or is it an acceptance letter?

Answer. "I look forward to discussing more of the details later this week," so things must not have been finalized by then. But it must have been my acknowledgment of an initial conversation we had.

Question. Let me show you another document, this is a March 26, 1995, letter that is addressed to Maggie Williams, and it appears to be from Johnny Chung.

Answer. Right.

Question. Did have you seen this before? Obviously you have. This is another one you produced.

Answer. Yes. Johnny wanted Maggie to know that I would be working for him, or—yes. So he wrote this letter. I think he actually like dictated it to me or something.

Question. You think you typed this up?

Answer. Yes.

Question. Is that why you would have a copy of this?

Answer. Yes. Otherwise, I think it would be on his letterhead. But whatever letter she would have gotten would have been signed from him, so I don't know exactly.

Ms. AMERLING. Let the record reflect that this letter is not signed.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you believe or do you know whether or not he actually sent this letter or the original to Maggie Williams?

Answer. Actually, I remember handing Maggie this letter.

Question. Would that version have been signed?

Answer. It must have been.

Question. Would it be on AISI letterhead or pretty much as it appears here, without any letterhead?

Answer. I don't know. I don't know why he would have given me letterhead of his at that point though.

Question. Where do you think you typed it for him?

Answer. I have a laptop.

Question. Okay. Let me——

Answer. Wait, I didn't by then. I don't know. I didn't have my own laptop by then. Where was I living? Did I borrow a friend's computer? I did have a roommate that had a computer then; it could have been that.

Question. Okay. In this letter to Maggie Williams, he calls in the third paragraph down, your responsibilities, what he would call "courtesy visits for the groups of people coming over to America."

Answer. That is what he called these, what I was talking about.

Question. Also in the last paragraph on that page, the very last sentence, "With your approval, I would like Gina to continue to work and support this administration only with a slight change, that she switch over from your payroll to mine."

Answer. It is Johnny's humor. I was never paid at the White House. It is—yes.

Question. So at this time, I mean, he must have known, and/or Maggie and yourself, that you wanted to continue to work at the White House as a volunteer. Did you discuss that with him?

Answer. I don't know about in detail. There was definitely—I knew with the job we outlined, I would be working for him—that my time commitments would be to him when he was in town, so when he was out of town, I would certainly have free time, and I know I was all excited about this youth vote project that I wanted to work on; and I don't know if it was specifically said, I am going to become a White House volunteer now.

Ms. SAFAVIAN. Okay. First of all, let me make sure, so I don't forget, let's mark the March 21, 1995, letter that you wrote to Johnny Chung as number GR–12, and the letter Johnny Chung sent to Maggie Williams on March 26, 1995, as GR–13.

Ms. AMERLING. Just for the record, I don't think we have established that this document you just assigned GR–13 is the same document that was actually sent to Maggie Williams.

[Ratliffe Deposition Exhibit No. GR–12 was marked for identification.]

[Ratliffe Deposition Exhibit No. GR–13 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Ratliffe, I believe you testified you did hand——

Answer. I handed Maggie a letter. I don't know if it was like this and signed by Johnny. I don't know if it was on his letterhead. I don't remember why I have a copy that looks like this. I can't believe I would handled her something like this unsigned.

Question. But you did hand Ms. Williams a letter?

Answer. Yes. Because I wanted to talk to her about working for him, or letting her know.

Question. I was going to say, the last paragraph of that letter mentions, "Maggie, if you like, I am happy to talk to you about this. You can call me at," and he leaves a phone number, with any questions.

What did Maggie say when you handed this letter to her and discussed this with her?

Answer. Maggie was always busy. I remember it was like late at night. She is walking out the door with her coat on. I said Maggie, "I have something I want to talk to you about," and I handed her this. And I remember she like kind of skimmed through it, and was walking out with Marge Tarmey at the time. She said, "Oh, my God, she is going to work for Johnny." Don't quote that per se, but it was something along those lines.

Question. That was something Maggie said?

Answer. Like, oh, my gosh, he wants her to work for him, or something along those lines.

Question. That is what Maggie said?

Answer. Yes.

Question. Did you sit down and talk with her, one on one, about it?

Answer. No. She was definitely walking out the door then.

Question. Was she ever concerned about you accepting a job with Johnny Chung?

Answer. Not that—I mean, she never like sat me down and said—gave me warnings or anything. I remember Marge was a little more concerned, like when I got back from China, Marge was like, you made it back, you know.

Question. Why do you think she was concerned?

Answer. I mean, I think people were a little skeptical are him.

Question. Was she fearful of your safety, saying she was glad you made it back?

Answer. Yeah, it was—I don't remember any specific conversations. It is not like anyone sat me down in their office. They certainly had other things going on.

Mr. ZACKS. Can we take a 5-minute break?

Ms. SAFAVIAN. Absolutely.

EXAMINATION BY MS. SAFAVIAN:

Question. Back on the record.

Before the break, we were talking about you accepting the job with Johnny Chung and speaking with Maggie Williams about it. Besides informing Ms. Williams, did you speak with anybody else about accepting the job with Johnny Chung?

Answer. Yes.

Question. Who would that have been?

Answer. My parents, friends, professors.

Question. Did you ever speak with the NSC, the National Security Council, about accepting a job with Johnny Chung?

Answer. No. I never went to them and said, I am thinking of taking a job with this guy; will you check him out? I might do that now.

No, I never really worked with the NSC. The only thing that I really had to do with them was with the photos, when I heard that they were kind of—they were sort of the holdup there.

I don't know if anyone did check out Johnny or what. I never made a request myself to the NSC to check him out.

Question. Okay. Do you know, for instance, when Johnny Chung brought in the Chinese delegation, do you know whether or not the First Lady's office had the NSC or somebody else look into the backgrounds of these individuals?

Answer. Not to my knowledge. The only thing that I vaguely remember about that was, after they got into the radio address—and this is all hearsay—but I heard that the President said to somebody, or something like, who are these guys, or check them out or something like that; and then I guess the NSC was checking them out, and that is why the photos were being held.

So that is what I remember about that.

Question. You don't believe the First Lady's office did any background checks on these individuals before they let them in to see the First Lady?

Answer. I mean, they had to have been cleared in, but I wasn't involved with anything like that or knew about it.

Question. Were you ever—I am talking generally now—were you ever involved in helping to vet potential guests into the White House?

Answer. Vet?

Question. The process, that is a term of art that they use—looking into the background of individuals, clearing them before they enter the White House.

Answer. No. That wasn't my—I mean, the absolute most would be if somebody called in and said, "I am having a meeting with Maggie. I want to confirm I am cleared in." I would take down like a message or something, or so and so. The most I would probably be involved in would be a phone message.

Question. Do you know who in the First Lady's office would do that, if anybody?

Answer. Who cleared people in? Anybody on staff could clear people in.

Question. You don't know of anyone in particular who would look into the backgrounds of anybody before they let them into the First Lady's office? Someone who wasn't a normal visitor?

Answer. I mean, to my knowledge, it wasn't really a need for that.

Question. Okay. Let me show you an e-mail that is dated April 7, 1995, from Robert Suettinger with the NSC. Have you ever seen this e-mail before?

Answer. No.

Question. Why don't you take a moment and read through that.

Mr. ZACKS. This is on April 7th?

Ms. SAFAVIAN. Yes. If you look, there are two e-mails on this page. At the bottom there is one from a M. Brooke Darby, and she was sending it to the Asian Affairs Department. What the one on top is, is the response to the bottom e-mail. They are both done the same day, April 7, 1995.

Mr. ZACKS. The bottom is a response to the top?

Ms. SAFAVIAN. No. The top is a response to the bottom.

Ms. AMERLING. It appears that way from looking at the document.

The WITNESS. I do remember this now.

EXAMINATION BY MS. SAFAVIAN:

Question. First of all, you have never seen this before; is that correct?

Answer. No, I have never seen an e-mail. I am sorry, I had completely forgotten. I don't know who this Darby is, but Bob Suettinger does ring a bell.

Question. Okay.

Answer. I do remember going up to his office now, and I guess I asked him, said something about—it is really unclear. Like I remember him more talking about his kids, and like I think this was—and saying don't take it or whatever. I must have told him something about it.

Question. Just so the record is clear, the second paragraph says "Having recently cancelled a young intern from the First Lady's office, who had been offered a dream job by Johnny Chung, I think he should be treated with a pinch of suspicion."

Answer. Yes.

Question. So you do recall now——

Answer. Yes, I do. I remember his office, like I remember like—you have to like press these little buttons to get into the NSC. And I had delivered whatever, inter-office envelopes, there before. But I do remember now talking to this guy. I don't really remember what I said. I remember him talking about, I think he said, I have a daughter your age, or something, and I wouldn't want her to take a job like this, something to that effect.

I don't remember actually sitting down and outlining to him, yeah, Johnny Chung offered me this job; these are going to be my responsibilities. I had completely forgotten about that.

Question. Do you recall why you would have gone to Robert Suettinger? Did someone recommend you do that? How did that happen?

Answer. Honestly, I don't remember. My guess would be that Maggie must have had some involvement in this or looking out for it. I don't know if it was like after I showed her the letter. I don't know if she said, go talk to this guy. She is always very busy, but she was good about looking out for her staff people, not that I was on staff. But, yes, I don't——

Question. You talked to him?

Answer. Is he short, bald and kind of chubby? I can't even remember exactly.

Question. I am afraid I can't tell you.

Answer. Okay. I vaguely remember this.

Question. So you just had a brief conversation with him?

Answer. Yes.

Question. Just one time?

Answer. Yes. That is all I remember. I can't imagine more. No, I don't remember anything.

Question. And he had counseled you not to accept the job?

Answer. The most I remember, if this was the guy, him saying, I have a daughter your age, and I wouldn't like to see her take that job. That is like what sticks out.

Question. Okay. What did you think of his advice to you?

Answer. I don't know. Apparently I didn't listen to it.

Actually, I was thinking about this as all this deposition stuff came up, that no one—I was thinking, you know, it is really funny that no one advised me not to take this job except for a professor of mine from Kalamazoo.

He lived and worked in China for a while, and I took a course from him on Asian political systems, so I called him thinking that he would know about, you know; and Dr. Tanner, what do you think? And he is like, "Don't do it." He was saying, "Chinese men are slimeballs. You know, you could get a job working for anybody. I would like to see you find something else."

I talked to professors at Western, and they are like, go for it, this sounds great. White House folks were kind of—like as far as like Maggie or Evan or Marge or any of them, no one really seemed to say like, great; or, don't do it, from what I remember.

I remember this one professor being the only one that really suggested not to take it. But then I see this and I vaguely remember this guy saying that too.

Question. Okay. You read through this e-mail. In this e-mail, Bob Suettinger calls Johnny Chung a hustler. He says in the second paragraph "My impression is that he is a hustler."

Had you heard anyone call Johnny Chung a hustler?

Answer. No, because that would have really—that label would have stuck out to me as a big warning sign. Definitely, in looking at this job, it wasn't your standard first job out of college—you know, set, safe and secure situation. I mean, I had my doubts, wondering what is this really going to be, what is going to unfold? I realized it was, you know, sort of a risk, because I didn't really know what I was getting into.

But decided to do it.

Everything was sort of, at that point, gray. It wasn't like white or black. But hearing the word "hustler" makes me, I wouldn't have wanted to work for somebody that had that label.

Question. So you did not know about that?

Answer. No. I never saw this e-mail.

Ms. SAFAVIAN. Okay. Why don't we mark this GR–14.

[Ratliffe Deposition Exhibit No. GR–14 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Do you know if Johnny Chung knew that the NSC considered him to be a hustler?

Answer. I have no idea. He would have been deeply offended. No, the way Johnny talks, everybody is his friend, everybody loves him, this was then, you know. My good friend, Maggie, my good friend Don Fowler, that is sort of the way he talks. He never talked about you have some friends, you have some enemies. It was never anything like that. Everybody was his friend. Everybody loved Johnny.

Question. Let me just show you real quick and see if you have any knowledge about this, this is the same E-mail we just looked at. However, this is one that was produced by Johnny Chung in response to our committee's subpoena. Do you know why or how Johnny Chung would have a copy of this e-mail?

Mr. ZACKS. Counsel, do I take it that this was faxed to Mr. Chung on the 21st of February '97?

Ms. SAFAVIAN. Unfortunately, I cannot answer that. The fax transmission at the top of the page. I just don't know the answer to that.

Mr. ZACKS. The specific question, Ms. Ratliffe, is do you know how Mr. Chung got a copy of this e-mail?

The WITNESS. No.

EXAMINATION BY MS. SAFAVIAN:

Question. Did you know that he had a copy of this e-mail?

Answer. No.

Question. Let me just for the record mark that as GR–15.

[Ratliffe Deposition Exhibit No. GR–15 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. So your first duties or your first job that you had to do was you went to China with Johnny Chung.

Answer. Yes.

Question. We have already established you left April 11th and returned April 25th?

Answer. Yes.

Question. Who all went on this China trip?

Answer. Johnny, Art Liang, is how you say his last name. It was the three of us that went over there from his LA office. And he—that is who went to China.

Question. And what did you do while you were over there?

Answer. Meetings, all the time. Mostly meetings. I did very little sight-seeing.

Mr. ZACKS. Thirty seconds. Nobody move. I will be right back.

[Recess.]

EXAMINATION BY MS. SAFAVIAN:

Question. You were talking about your trip to China. You went to meetings?

Answer. Meetings.

Question. No sight-seeing?

Answer. A little.

Question. Was there any purpose to these meetings? Were they all varied, different kinds of meetings? Can you give me any explanation?

Answer. Johnny's mission was to do this peacemaking, bridge-building thing. It was like an unofficial-official visit sort of thing. I don't even know what is important or what you want me to say about it. We met with people that they considered to be in their private sector, and we met with government officials. I had a translator with me most of the time, but didn't always translate. To me, it seemed like a bunch of the same thing he was doing here, just over there. Just the meet and greet, hi, I am so important, hi, I know so many people, hi, I have so much money, hi, I can help you. You-need-me sort of ego trip that he was on.

Question. Was he trying to get clients for his business, his fax business?

Answer. No. Like he talked about wanting to set up a Beijing office, but he like went with this messenger of peace mentality, that he was there to help build this bridge between the two countries. So he would meet with people there.

I can't even remember all that he talked about. I just remember being so irritated because it was just a big brag session for him. Either how much money he had or how much everybody liked him or how whatever he thought he could do.

Question. You brought in today from the documents you brought with you, was a folder of materials from your trip to China; is that correct?

Answer. Yes.

Question. Is this the same trip to China that we are talking about right now?

Answer. The one and only.

Question. You only took one trip to China?

Answer. Yes.

Question. You also had a—well, we can start with this stack here, a stack of brochures from different, it looks like different companies.

Answer. Yes.

Question. Are these representative of some the meetings that you had?

Answer. Correct.

Question. Okay. Do you recall anything in particular about any of these companies, the brochures you kept? Was there any reason you kept these?

Answer. It was just stuff that people handed out. I honestly can't even tell you what was there. We went back to a couple of them more than once.

Question. Do you recall which one?

Answer. Is there something from the exhibition center in there? I guess not.

This was a news agency that Johnny talked about.

Question. This, I am not going to try this, K-I-N-H-U-A news agent, news bulletin?

Answer. It was just like them showing an example of what they do.

Question. And it looks like you went to the——

Answer. That was actually more sight-seeing.

Question. The Yan-Huang Art Museum?

Answer. Yes. The artist, like he did these, I don't even know what this means, but this was supposed to be really special. I was supposed to be very honored to receive whatever name he gave me.

Question. Okay. This other one is China Enterprise Management Association.

Answer. I have no idea.

Question. There is another brochure here called "China International Exhibition Corporation."

Answer. That might be the—I honestly don't remember it looking like this. I really don't even—they are not like Americans. They don't like meet, have a meeting to discuss something and do anything about it, at least that is not what we did. It is like show up, shake hands, pass out name cards, tour the joint, talk, set up a time to meet for dinner kind of. At least that is what I got from it. It is not how can we work together and what can we produce or make or anything like that.

Question. So you don't really recall anything specific about——

Answer. The only tangible thing, Johnny was looking—there was one place Johnny was looking for office space to set up his Beijing office, and this was just one example of many. He was looking at this one space. It had like the Chinese military outside of it, and, you know, me acting in good faith, I am thinking, I don't think that would be a good place to set up an American business, if you want other Americans to know about your business here.

Anyways, he said, yeah, that is a really good point. I am not going to have office space there. Then we went back the next day and he is sitting there telling them how interested he is in having office space there. And I knew he clearly wasn't, and you don't have to be that blunt about it. But that he was being that blatant to go out of his way and still saying how interested he was, when we had discussed the night before that he clearly wasn't.

I said something to him about it the next day, and he got angry. That is the only thing I remember.

Question. You think that is, what, the China International Exhibition Corporation or something else?

Answer. I don't know.

Question. Another brochure that you have with you is from China Xinxing Corporation.

Answer. I have no idea.

Question. And the last one is it looks like a brochure from the Beijing Tong BRN Tang Group Company in China.

Answer. This is something about ancient medicine. I honestly don't remember. We just went to place after place after place, back-to-back. The only thing that sticks out to me, Johnny kept talking about the number two beer-making corporation, and something about an oil company. We probably spent more time with those dudes than any of these others.

Question. Okay. You also brought along a set of business cards. Are these cards that you were given when you were on your trip to China?

Answer. Yes.

Question. Some of them are from just a couple, are from AISI, yours is in here, and Irene Wu and a couple other people. Are these just ones you put in the stack or you actually got these in China?

Answer. Those cards would be a pile of cards that I obtained while working for Johnny. I would say most of them came from the China trip. There were a couple of delegations when I was working for him that came here, and they might have given me cards, like when we went to dinner or something. Irene's I probably got when I was in LA.

Question. You mentioned just a second ago that Johnny talked a lot about the second beer manufacturer.

Answer. Yes.

Question. The name of that is Haomen Group?

Answer. I have no idea.

Question. Do you remember the name of it?

Answer. It might be one of these guys.

Ms. AMERLING. Let the record reflect the witness is looking at Exhibit GR–2.

The WITNESS. I am not positive, but there is a chance that Evans, and like his son, whoever it is, we had dinner with him one night. There was like a grandpa, a father and a granddaughter.

EXAMINATION BY MS. SAFAVIAN:

Question. This is the beer manufacturer?

Answer. The beer thing, yes. Johnny seemed to be kind of tight with them.

Question. Let me show you two—first of all, the gentleman that you were pointing to in GR–2 is the gentleman at the far end of the photo on the right with glasses and balding. It is hard to say. He doesn't really list names at the bottom in order, so I don't want to confuse him.

Let me show you two business cards you have in your stack. They are both Haomen Group. Do these names help you at all with the dinner you had?

Answer. No. Honestly, like they all look the same to me. I just remember the guy we had dinner with was like older than like these guys were like the norm, and he was——

Question. These guys being Johnny Chung is one of them?

Answer. These guys in here. Most of the guys I would say were in their like forties and fifties, and this guy was a little older, a little skinnier, and had a little less hair. So if it was him or another person.

Question. You are not sure that this is identified as him?

Answer. That is all I am trying to say.

Question. Okay, that is fine. Did you learn anything else about the beer manufacturing company that you were talking to?

Answer. Johnny was big on them. I don't know why exactly. I don't know why he was tight with them, how he knew them. He was constantly bragging about we are going to have dinner with the number two beer-making corporation in China. I don't know if they did come to the U.S.

Question. Do you know if Johnny Chung owned stock in the beer manufacturing company?

Answer. He never mentioned to me if he did. I never heard anything about stock.

Question. Let me just, for just a couple, read off some of the names. China International Trust and Investment Corporation? See if they mean anything to you?

Ms. AMERLING. Just to be clear for the record, counsel is reading off business cards.

The WITNESS. It doesn't sound familiar and it doesn't not. I know that is not helpful.

EXAMINATION BY MS. SAFAVIAN:

Question. Just let me know if any of them do. The name on the card is H-U-A-N-G, J-I-C-H-U-N.

Answer. The exact names mean nothing. The beer-making company and the China petrochemical corporation, he talked about that a lot.

Question. Do you recall in what sense?

Answer. We had dinner, I think, or lunch, at their headquarters. I might have even gone shopping with his daughter, if that was the same place.

Question. Okay. How about China Chamber of International Commerce?

Answer. Yeah. You know, what, that is who this guy is, isn't it?

Question. One of the gentleman, the photo with Mrs. Clinton, the Chinese delegation, one of the gentleman in the picture is from the China Chamber of International Commerce.

Answer. We spent a lot of time with him. We went to his home one afternoon.

Question. S-H-E-N-G?

Answer. The names mean nothing to me.

Question. Do you recall anything else about that?

Answer. The Chamber of Commerce dude seemed to be, and I could be wrong, but he seemed to be the link between the higher-up officials. When we were there, we got in to meet who I thought was Vice Premier Lee. Actually that reminds me it wasn't him. This is, I think, the Chamber of Commerce guy——

Question. You do think this is the China Chamber of Commerce guy?

Answer. Yes.

Question. The one standing next to Mrs. Clinton?

Answer. And not Vice Premier Lee. The Vice Premier lives in the Forbidden City. I don't know. Chinese residents are not allowed to go in there. I don't think women usually are either, but somehow Johnny got us in there. One of the guys that we were kind of with, that was sort of with our group, he lives over there, but apparently works for Johnny. I don't know if he is like the Beijing office or whatever Johnny would call it, I don't know, and he wasn't allowed in.

When we went in, Johnny got his picture taken with this guy. I absolutely didn't even care about it, didn't even want it. I got my picture taken with this guy. Art, who was also Johnny's like chief of staff or whatever you want to call him, got in, but didn't get his picture taken. Art was like furious about this. It was like a whole big prestige thing with them. And I don't even know what they sat there and talked about. But this translator guy was there for that.

Question. Okay.

Answer. And I think this Chamber of Commerce guy was like the link, the political link.

Question. That is how you got in the Forbidden City?

Answer. Yeah. I mean, Johnny was definitely involved in making all that happen.

Question. Okay. Does China Everbright Group mean anything to you?

Answer. That sounds familiar. I have no idea why. Are they a bank?

Question. Well, there is one called Everbright Bank of China on another card that you have.

Answer. It all——

Question. That is fine. Now, you mentioned earlier there was this flurry to get these photos with the President. You had to have them to take to China, and you brought them to you. What did he do with the photos once he got to China?

Answer. I assume he gave it to them.

Question. Did you see that happen?

Answer. I must have, because I was always with him, but honestly it doesn't like stand out to me as part of the trip.

Question. Do you recall him showing anybody photos? I think, you know——

Answer. Oh, we took a crate of those books.

Question. Of the brochures?

Answer. To hand out to everybody we met with, yes. So he definitely passed those things out like crazy.

Question. Would he pass out any letters that he may have gotten from the President or the First Lady or anybody?

Answer. Well, actually I just saw on the left-hand side of that packet the Chinese stuff, I didn't even remember that he did, but just in preparing these for today, I think they were in here and I was laughing. It was in some stack.

Mr. ZACKS. I think they are in those booklets.

The WITNESS. Are they actually in the booklet?

Mr. ZACKS. I think so.

Ms. SAFAVIAN. I am not sure what you are looking for. Are you talking about these?

The WITNESS. Yes.

EXAMINATION BY MS. SAFAVIAN:

Question. These are letters that you had, that you brought in today. I was going to ask you about these.

Answer. Johnny had—he gave me just a stack of his correspondence or whatever, and so but I noticed that there was some packet of something that he had handed out, and I think a letter from the President, Al Gore and Mrs. Clinton were in it.

Question. If any of these look familiar to you, why don't you state that for the record and we can make those exhibits.

Answer. Maybe it wasn't Mrs. Clinton. Maybe it was just Al Gore and the President one.

Question. Why don't you take a look this stack also.

Answer. The letters are in from, but it was in something that he—I really thought it was in something like that, that he handed out to people.

Question. With his brochure?

Answer. I didn't think it was in the book. This is all the DNC-related stuff.

Question. Do any of those letters that you have been flipping through, do you recognize any of those as the ones that you copied for him and he handed out?

Answer. Johnny?

Question. Yes.

Answer. I didn't copy any letters that he handed out.

Question. I thought you—I am sorry, I misunderstood you then.

Answer. No. He had—my involvement in China, he had these booklets made up, and he had like a big crate of them that we brought to China with us, and——

Ms. AMERLING. "These booklets," for the record, are the booklets with "AISI Building the U.S. Fax Highway Today" on the cover; is that correct?

The WITNESS. Yes. And he would hand these out the way people hand out business cards. And I didn't think there were letters in these. I thought that I just ran across it in like a packet like that he had handed out.

EXAMINATION BY MS. SAFAVIAN:

Question. What letters are you recalling?

Answer. It was some boilerplate thank you letter of the President thanking him for his support for some fund-raiser.

Question. So he had a letter from the President.

Answer. Yes.

Question. Anybody else you can remember?

Answer. I don't remember if it was the Al Gore one, too. They are like these little like, you know, three-sentence letters of thank you for your support kind of thing.

Question. And he would pass those out along with these brochures?

Answer. No, no. I just ran across—he would pass these and his business cards out, or like hand them out in these blue packets with his business cards in it. I just ran across in my collection of materials for you, I really thought it was something like this, that he—if he was like handing this out to somebody, it was just like a one thing, that it was in there and it looked like he was including these letters to prove even more so that he was tight with the President or something. But this is what was handed out. And I don't even know what version. I'll bet it wasn't this version, because this would have probably—I don't know.

Ms. AMERLING. When you say this, what was handed out, we are referring to the AISI booklet?

The WITNESS. He has some different versions with different pictures.

EXAMINATION BY MS. SAFAVIAN:

Question. You are not sure if the picture of Mrs. Clinton and the delegation was included in the brochure he handed out?

Answer. Correct.

Question. Okay. Moving away from the China trip, although as I was rummaging through these documents, I did see one of the things you produced that says

Everbright Bank and Everbright Group. Let me show this to you, because you mentioned earlier Everbright was a bank. Does this help you remember who Everbright is?

Answer. Yes. This was a group that—I think, there was a group that came into town and they were with a bank, and the only involvement that I had with them was that I went to dinner with them one night. And there was probably a group of eight of us, and I sat and talked to this girl all night about the differences between the U.S. and China, culturally, women's issues. I don't know what all the men were talking about.

Ms. AMERLING. Counsel, can I have a copy of what she is looking at?

Ms. SAFAVIAN. It is in that stack right there.

Ms. AMERLING. Is it this document?

Ms. SAFAVIAN. Yes, it is.

The WITNESS. I remember Johnny had been showing them around.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall the name of the person you were speaking to that night?

Answer. No.

Question. Okay. Do you recall what this business did?

Answer. In this is the bank, there is something about—some bank was coming into town, everyone is interested in seeing the White House, some White House tour. I was really involved with like this kind of stuff, dinner reservations. Johnny at one pointed talked to me about some bank wanting to open up a New York branch. Something about something in New York, and he was wondering if he should get involved with it or not. But I honestly don't know——

Question. Okay. That is fine.

Answer [continuing]. A lot about it.

Question. Okay.

Answer. Or anything else.

Ms. SAFAVIAN. Since we talked about it, let me mark this as Exhibit GR–16.

[Ratliffe Deposition Exhibit No. GR–16 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. When you returned from China, what did your—first of all, you were located in the Washington, D.C. office for Johnny Chung?

Answer. Yeah.

Question. Okay. Can you tell me a little bit about that, how many offices he had, where they were located?

Answer. Physical offices, I saw would be in LA. His Washington, D.C. office was me, so, I mean, it is not like I got up and went to work at a location every day or anything like that.

Question. Where was it then?

Answer. That was when all of the problems started basically is when I got back from China. It was everything that was promised or talked about or was supposed to happen, or I thought had already happened actually didn't even exist.

Question. And what do you mean by that?

Answer. An office.

Question. A D.C. office?

Answer. Yeah. Phone, fax machine, desk.

Question. Were you working out of your home?

Answer. It wasn't really work. When I was in LA, he needed some letters typed, I remember, I think, to Don Fowler, maybe to Secretary Riley, and I typed some stuff there for him. But that was all out of the LA office. So when I got to D.C., I don't even think I dropped them off. I probably just mailed them. I didn't do anything for him when he wasn't there, when he wasn't in D.C.

Question. Well, you said that there wasn't an office, you didn't get up and go to an office. If you did anything for him, would it have been at your home?

Answer. I mean, he definitely called me at my house about things, but it really—what I learned about Johnny, his wife actually explained this to me during a conversation once. She said that Johnny is a dreamer and he gets himself into trouble when he talks about—he talks about things as if they actually are, rather than saying wouldn't it be nice if, or I have an idea, and I think this would be great.

So rather than saying it would be great if we could have a $3 million mansion to fly delegations over to that, you could run and, you know, occupy, he said "I have a $3 million mansion that I am building. It just needs some renovations. That is where you will work from," is what he said.

Question. Located where? Where was he planning on——

Answer. I gave you the paperwork on that. He showed me a picture of it, a map to it.

Question. Was this in D.C. or in LA?

Answer. It was like in McLean, I think in Virginia. I think McLean anyway. It is the last page on that stack. Yes. So he would hand me this and say this is where the office is going to be, this is where you are going to function out of. He told me it was going to be ready by June 1st. So I got back April 25th, expecting to move into this——

Question. Move into this home, this $3 million home?

Answer. Yes.

Question. Let me mark this so we can refer to it as GR–17.

[Ratliffe Deposition Exhibit No. GR–17 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Okay, go ahead.

Answer. So basically starting at this point, I—basically in China I wanted to quit the job.

Question. In China you wanted to quit the job?

Answer. Yes. I hated working for him.

Question. Why? What happened?

Answer. Because he was annoying. He was just this big braggart. It was this, me, me, me, I can do all this, I have all this money, I, I, I, I. It wasn't what I wanted to participate in. I wanted to work with the youth vote for the '96 election. So I came back. And then one thing after another just started unraveling, and that is why it was so short-lived, that within a couple of months I resigned.

Question. So he had promised you this $3 million home.

Answer. He gave me this paperwork, yes.

Question. Which is GR–17, and he said he was going to purchase this and this is where your office was going to be?

Answer. My understanding was it had been purchased.

Question. Okay.

Answer. That it would be ready June 1st.

Question. Were you supposed to live in this also?

Answer. Yes. Like a building manager sort of thing.

Question. And work out of it?

Answer. Right. Right. Because he knew I was interested in this youth vote stuff, he said you are going to have free time when I am not in D.C. You are going to be able to do your research, work on your youth vote things, and when I come into town with my delegations, I want you to have dinner reservations made and things set up. He even told me how he wanted me to be decorating it. He wanted it done Victorian style.

Question. So you thought this was a done deal?

Answer. This was my plan. This is what I was told.

Question. Then you found out that wasn't the case?

Answer. Yes.

Question. When did you find that out?

Answer. June 1st when my current—I was living in Dupont circle, and my lease was up, and so I asked him on a number of occasions, Johnny, I was excited, of course. I want to go see this place. He says oh, no, we don't have time now. Not now, not now. I didn't have a car in D.C., so to schlepp out to McLean wasn't something I was going to randomly do. I kept asking and kept asking.

Finally, it is not going to be ready for June 1st. So then I needed to go find another apartment and all of that.

Question. Let me show this to you. It looks like it is a lease for an apartment in D.C., if you explain that to me. I will mark that as GR–18.

[Ratliffe Deposition Exhibit No. GR–18 was marked for identification.]

The WITNESS. If we are talking about fall-outs, I think something happened before this. The bank account.

EXAMINATION BY MS. SAFAVIAN:

Question. I don't think I have that copy.

Answer. It was in my correspondence about my job with him. It is a very simple memo that says here is the Crestar Bank account information.

Mr. ZACKS. I gave you the stack from here.

EXAMINATION BY MS. SAFAVIAN:

Question. Let me hand this back to you, the lease, GR–18. So you said the troubles began earlier with a bank account?

Answer. Yes. I think. Let me see the date on this. I think the bank account thing happened first. This.

Question. Okay. This is a May 24—this is a letter you sent to Johnny?

Answer. Yes. I faxed it to him, I think.

Question. And you want to just tell us about this?

Answer. Yes. He had told me as we were getting ready for all of this, it is like I want to open up a checking account which will be the AISI expense account in Washington and when you need to do whatever it is that you are doing, you can withdraw from this account.

So I said great. He said go start, open up a checking account, whatever. So I used $20 of my own to go start this account, and I faxed him all the information. He said get me everything. So I faxed this to him right away. I think I did it all the day he asked me to do this.

Again, I didn't have too many responsibilities. It was like waiting. And it never happened. He never deposited any money in it. So this never happened. And then in June 1st I am supposed to move into this what I showed you. And that didn't happen. So then I had to go out and scramble at the last minute and find an apartment, and this is the apartment I found.

Question. This is the lease, GR–18.

Answer. Yes.

Question. Let me just say for the record that the letter that you typed, that you gave to him dated May 24, 1995, regarding the Crestar Bank account that you just talked about, we will mark as GR–19.

[Ratliffe Deposition Exhibit No. GR–19 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. And this lease, is this something that Johnny Chung paid for the rent on this, this apartment?

Answer. Yes. He was angry because he didn't—I couldn't find anything that—it was I had literally 48 hours or something to find a place. I found this place, and I had to sign a year lease on it. I know he was angry about that. And I said, you know, listen, you put me in this position, so he did. He paid for—initially he paid for the first month's rent and the security deposit for this. Because he kept saying you won't need that for a year, this place is going to be ready, this place is going to be ready, I don't want you signing a year's lease. I went, oh, my God, I don't have many other options right now.

Question. In the end, did he just pay for the security deposit and the first month's rent or did he pay for any more of the rent?

Answer. He paid for, I was there June and July. I think he had paid for July, too. I don't think he paid for rent beyond that.

Question. Did you move out of the apartment then?

Answer. Eventually.

Question. So it would be pass July that you moved out of the apartment?

Answer. Yes. I moved out—I actually moved out in December.

Question. And then you paid the rent yourself for the remaining months?

Answer. Yes. I had to get a roommate.

Mr. ZACKS. Excuse me. Just to clarify, during the time he paid the rent, this was the AISI Washington, D.C. office in effect, correct? Because there was no $3 million mansion?

Answer. There was no $3 million mansion.

Mr. ZACKS. So this was the AISI D.C. office.

The WITNESS. Yes.

Mr. ZACKS. This is where you worked out of for him while you were still with him?

The WITNESS. Right.

EXAMINATION BY MS. SAFAVIAN:

Question. Let me show you a fax cover sheet in, an AISI fax cover sheet, also one of the documents you brought with you today. This shows that AISI has several offices. Can you explain that to me, please?

Answer. Actually when I was gathering these materials, I never really paid attention to it before. Johnny always had so much hoopla going on that you just sort of had to sort, at least that is how I handled him, I just sorted through whatever, let

him talk his talk, and I was looking at this, Hong Kong, Taiwan, three China offices? I never saw them, heard about them, know any of the people. Oh, except this one guy, he must—David Chen I met him in China.

Question. David Chen is the contact person for the China office in Beijing?

Answer. The Beijing office, yeah. He might also be—he might be the son of this second largest beer-making company in China.

Question. He might be the son?

Answer. He might be. I can't remember exactly.

Question. And you know you met Mr. Chen, C-H-E-N?

Answer. Yes. He was the one also I believe couldn't get into the Forbidden City or wherever we went with the Vice Premier, because he lives there and apparently you are not allowed to go.

Question. You do have in your possession one of the business cards. There is one for David Chen on an AISI business card that says special assistant to Chairman, and it gives a California office address and a China office address in Beijing.

Answer. Okay.

Question. This is the same defense David Chen, this business card?

Answer. He had a cell phone. I never saw any office. I don't know what his responsibilities were.

Question. You don't know what Mr. Chen did as special assistant to the Chairman?

Answer. No. He might have been involved in some of the scheduling for the China trip of all of these random businesses that we met with, but I just remember him with his phone.

Question. Okay. So the California office that is on this fax cover page, that is an office?

Answer. That is an office.

Question. You saw that.

Answer. That is a big office.

Question. The Washington, D.C. office listed, 955 26th Street, Number 709, Northwest. Did that exist?

Answer. That might be Johnny's apartment that he had in Washington.

Question. That is not your apartment?

Answer. That was not my apartment.

Question. The contact person is Dr. Wen C. Lin, senior advisor to the Chairman?

Answer. I have no idea who that is.

Question. Never met him?

Answer. If I did, I don't remember.

Question. There is a Hong Kong office.

Answer. No, they wouldn't take me to Hong Kong. I wanted to go.

Mr. ZACKS. Off the record a minute.

[Discussion off the record.]

EXAMINATION BY MS. SAFAVIAN:

Question. Back on the record. I notice there are two contact people listed for the Hong Kong office, a Mr. George Liu?

Answer. Oh, that sounds real familiar.

Question. You have his business card also.

Answer. George, I think I met George.

Question. Not in Hong Kong.

Answer. Not in Hong Kong, no. I did meet George, and he has a girlfriend named Jennie who is a dentist professor at NYU, I think. This is all totally just coming back.

Question. Do you remember where you met Mr. Liu?

Answer. He flew in—if this is the same guy, he is this chubby dude that had a ton of money, and I didn't know he really worked for AISI.

Question. I am showing you an AISI business card for George Liu which says he is special assistant to the Chairman and gives the California office address and a Taiwan office address on his business card.

Answer. Johnny is Taiwanese.

Question. Actually, farther on that fax cover sheet there is a Taiwan office, and Mr. George Liu is the contact person for that office also.

Answer. Okay.

Question. Do you know what he did for Johnny Chung?

Answer. George had a ton of money of his own, and I can't remember.

Question. Was he a shareholder?

Answer. No, but some other lady was that I met at one point. I don't know if I met her in China or in LA. I don't know. But George just seemed to have fun with life.

Question. You said some other woman. There is also a Ms. Emily Chang listed as the contact for the Hong Kong office. Does that ring a bell?

Answer. That name doesn't. But I remember meeting some woman that was probably in her forties or fifties that Johnny introduced to me as on his board or something like that.

Question. You don't recall her name?

Answer. No.

Question. So you don't know if there is really a Hong Kong office?

Answer. No.

Question. Do you know if there is a Taiwan office?

Answer. I thought——

Ms. AMERLING. Can you verbalize here?

The WITNESS. No, I don't know. I thought Johnny had not been back to Taiwan since he was 12. I thought he left when he was 12 and never went back. But, I don't know. Apparently.

EXAMINATION BY MS. SAFAVIAN:

Question. There is also another contact person in the Taiwan office, a woman, Ms. Li-Ching Chen.

Answer. I have no idea.

Question. Then we mentioned earlier this Beijing office with David Chen. You don't know if that exists?

Answer. No, I don't.

Question. And another contact person is a Mr. Yei-Jun He.

Answer. I remember people saying a Mr. He, Mr. He, but I don't have any more recollection other than that.

Question. So you don't know what he did for Johnny Chung?

Answer. No.

Question. There is another China office, actually there are two more China offices. There is one in—let me spell it, Q-U-A-N-G-Z-H-O-U. Do you know if that office exists?

Answer. I don't know that any of these offices exist. The only connection I can make with one of these, if you know which one of them is in the north, this young dude owns a bunch of hotels there.

Question. Is this Mr. Sun?

Answer. I can't remember his name.

Mr. ZACKS. May I ask a point of clarification? During your China trip, did you visit any of these China offices listed on—this isn't an exhibit yet.

Ms. SAFAVIAN. It is going to be.

Mr. ZACKS. This AISI fax cover page?

The WITNESS. I don't remember visiting any AISI office.

Mr. ZACKS. Okay.

EXAMINATION BY MS. SAFAVIAN:

Question. The gentleman you were pointing to in Exhibit GR–2, the young gentleman all the way on the left of the picture, the fax cover sheet lists a Mr. Jian-Feng Sun. Mr. Sun, it appears, is one of the Chinese delegations in the picture, and Johnny writes under the picture with Mrs. Clinton, the young entrepreneur from Xinjiang. That is also one of the locations of one of the China offices.

Answer. I never saw it or really heard about it. He was in Beijing when I was there.

Question. Mr. Sun?

Answer. Yes.

Ms. AMERLING. By it, you are referring to the office?

The WITNESS. I never saw any AISI office other than the one in LA.

Ms. SAFAVIAN. Let me mark this AISI fax cover sheet as GR Number 20.

[Ratliffe Deposition Exhibit No. GR–20 was marked for identification.]

Ms. AMERLING. Could we assign an exhibit number to the business card you were referencing as well so the record is clear, the George Liu?

Ms. SAFAVIAN. Why don't we put these all on one page? I referenced George Liu and David Chen. We can copy those on one page and make those Exhibit GR–21.

[Ratliffe Deposition Exhibit No. GR–21 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Okay. So you were having problems with Johnny with your apartment. Did you end up doing any work for him? Did you do anything for him?

Answer. I started to. I tried to. He told me that he wanted me to know about all the finest restaurants in D.C., and I was supposed to go and check them out beforehand while he was away in LA or whatever, and get to know the general managers there, the menus, et cetera, so I went to Martin's once and had dinner. It is like I started to try and fulfill some of my responsibilities while he was out of town, because I basically wasn't doing—he didn't give me anything to do. There wasn't anything to do. So I went to Martin's.

Question. Did he pay?

Answer. Eventually I was reimbursed.

Question. Did you ever schedule any—were you ever this, what was your title, courtesy——

Answer. Courtesy visits.

Question. Did you ever prepare any dinner reservations or tours around D.C. or anything for any delegation that may have come to town?

Answer. No. I went to dinner with that bank group that night, but he had arranged all that.

Question. When you say that bank group, do you mean the Everbright Bank?

Answer. Yes. He arranged that.

Question. Okay. So he didn't have you arrange——

Answer. I never set up tours, I never made dinner reservations, no.

Question. Did you set up anything for Johnny and/or any of his guests at the White House?

Answer. No. He came into town one time when I was like technically working for him, yet a volunteer, and I didn't even know he was coming into town. He called the First Lady's office and he wanted a tour, and Ann McCoy, I believe it was Ann McCoy, showed him around. It was someone other than me. I remember sitting there saying I am not even doing my job when he comes into town.

Question. Did you schedule that tour for him or did he contact Ann McCoy directly?

Answer. I don't know if he called the First Lady's office and if somebody else there called or if he called her directly. I don't know.

Question. You had nothing to do with it?

Answer. No. I don't remember it. I remember thinking it was weird that Ann was showing them around.

Question. Did he ever have you contact anybody at the DNC on his behalf?

Answer. We went to the DNC. I went to the DNC with him. I think—again, it was one of these like meet-and-greet, handshake kind of things. It was no meeting really. We might have met Don Fowler. Whoever happens to be walking down the hall, you know, Johnny—of course, everybody at the DNC knows who he is and runs up to him, "Johnny, we have a breakfast coming up in LA," and they are like handing him stuff. He was introducing me to these people.

The person we talked to the most was whoever sits outside of Don Fowler's office.

Question. Does Carol Caire ring a bell?

Answer. I thought it was like a Selinda.

Question. Sandra Scott?

Answer. Yes. Is she an African-American woman?

Question. I don't know.

Answer. Like topical Johnny fashion, the real—I shouldn't say that, well, the real people didn't make time or have time for him, and he was sort of shuffled off to assistants or whatever.

Question. Who do you mean by the real people?

Answer. If you want to, like, relation would be Maggie and Evan, you know, like Maggie didn't have—I never saw him go and sit in Maggie's office for any sort of formal meeting. But Evan would have to entertain him, so-to-speak, when he would come in, so he would still feel important or whatever. So I remember spending more time with her than anyone else at the DNC, was my point to that.

Question. Let me show you a——

Ms. AMERLING. So the record is clear, more time with whom?

The WITNESS. Sandra Scott, if that was her name.

Ms. AMERLING. You are not certain it was Sandra Scott?

The WITNESS. I believe it was somebody that was an assistant to Don Fowler.

EXAMINATION BY MS. SAFAVIAN:

Question. Let me show you a June 5, 1995, letter, to you from Johnny Chung.

Answer. Yes.

Ms. AMERLING. Could you point me where I could find that document?

Ms. SAFAVIAN. This is one of the ones that she produced to us today. It is in one of the stacks.

The WITNESS. She can have that one.

Ms. AMERLING. If you could give me one minute to look at it, I will give it back in a minute.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you remember receiving this?

Answer. Yes.

Question. This letter. You do recall receiving this letter?

Answer. Yes. It was Fed Ex'd.

Question. It was Fed Ex'd to you?

Answer. Yes.

Question. It shows that he enclosed a paycheck for the month of May, and a personal check to assist you with your move. The next paragraph says, "As you are aware, there is usually a 3-month probation period for all new hire employees. I would like to request from you at this time a proposal on what you can contribute and how you can assist AISI in Washington, D.C. After all, that was the major reason for your employment with us.

"I am very sorry to say that your performance lately has not been satisfactory to our agreement. I do expect to see some kind of improvement and enthusiasm from you in the next 30 days for I do know that you have a lot more to offer. Under careful reconsideration, your China trip is temporarily postponed. I also want to inform you that the Chippewa delegation which was scheduled to arrive in D.C. at the end of June has canceled their trip."

Did you know about this 3-month probation period?

Answer. No. Nothing was ever in writing with Johnny. I mean, we sat down and talked about the job itself or my responsibilities, that wasn't in writing. There was never any contracts. There certainly wasn't any 3-month probationary period talked about. Johnny talked about doing this work for 40 years or so. So 3 months——

Question. For you to do this work for 40 years?

Answer. He would—I don't know about me specifically, but he was talking to me. He would talk about this is a long journey and this messenger of peace mission that he has doesn't happen overnight, and this is 40 years of work ahead of us, and he would just sort of talk like that.

Question. Okay.

Answer. So I didn't——

Question. He wanted you to determine how you could assist AISI in Washington?

Answer. Yes. Actually, I don't remember that portion of it. I think in essence here, Johnny was irritated with me because I kept bugging him about everything that all of his promises, and he wasn't fulfilling any of them, i.e. the badge account, the house, anything. And I had to really put a lot of pressure on him to get the money by June 1st. I had to make a deposit to move in with this new lease and everything. So this is what came after that.

Question. Did the two of you sit down and discuss what you could do for AISI?

Answer. No.

Question. Do you know what he meant by your performance has not been satisfactory to your agreement?

Answer. Not exactly. We never discussed it specifically.

Question. Did that come as a surprise to you?

Answer. Yes.

Question. Did you talk to him about it ever?

Answer. No. The only tangible thing that I can remember is that there was—when I was in LA originally in April, he handed me this stack of correspondence and other pieces of information. I don't know if it was before or after this letter, but there was something that he said he gave me to send in an RSVP thing for, and I think it was the Doris Matsui Asian American something or other event going on at the White House. I enclosed that in the documents. He was angry—he missed it for some reason. I don't know if he had forgotten about it, if I didn't send it in. But I have the RSVP form there. So I don't know what happened exactly, but he was furious that he missed this meeting. I can't remember if it was before or after this letter.

Question. And he blamed that on you?

Answer. Oh, yeah. Yeah.

Question. There was another China trip you were supposed to take?

Answer. Yes, I had forgotten about that, too. I am sure this sounds really whimsical, but the way Johnny talks, it is like he talks about $3 million mansions and I was also going to have a car and a driver and a maid, and another trip to China and so it is like you don't really—at least I didn't hold on to—another trip to China, okay, we will see what happens. Like I wanted to quit. So I actually had completely forgotten about that trip.

Question. It never came to be?

Answer. I think he went. I never went.

Question. Okay. Let me mark that as Exhibit GR–22.

[Ratliffe Deposition Exhibit No. GR–22 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Just so the record is clear, mentioned in that letter was he was giving you a personal check to help you move, and that is JCO 4068. Is that correct?

Answer. Yes.

Question. And that was for $2,000.

Mr. ZACKS. That was to the apartment referenced in that prior lease. Was that marked as an exhibit?

Ms. SAFAVIAN. Yes, it was.

Mr. ZACKS. This check relates to the move for the lease represented in GR–18, right?

The WITNESS. Yes.

Mr. ZACKS. Which served as the AISI headquarters as well as where you were staying for that period of time.

The WITNESS. Yes.

EXAMINATION BY MS. SAFAVIAN:

Question. Was this $2,000 for the security deposit and first month's rent?

Answer. Yes.

Question. Let me mark that as GR Number 23.

[Ratliffe Deposition Exhibit No. GR–23 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Let me hand you something else referenced in the letter. This looks like it was your paycheck.

Answer. Yes.

Question. It is dated June 1, 1995, and it shows it was $1,955.60.

Answer. Sixty-four cents.

Question. I am sorry, 64 cents. What was your agreed upon salary with Mr. Chung?

Answer. $29,000 a year.

Question. $29,000 a year.

Answer. Yes. Plus the, you know, the house and cars and maid. But my personal paycheck was to be $29,000.

Question. Okay. Did there come a time when you did not get paid from Mr. Chung?

Answer. I always received my payroll paycheck to my knowledge.

Question. You did always receive that?

Answer. There weren't that many. Was it June——

Question. May, June——

Answer. And then I quit in July.

Question. So you never had a problem getting your paycheck from Mr. Chung?

Answer. No.

Question. Okay. Let me mark that as GR–24.

[Ratliffe Deposition Exhibit No. GR–24 was marked for identification.]

The WITNESS. I believe he also gave me severance pay when I quit. I don't know if that counts as that.

EXAMINATION BY MS. SAFAVIAN:

Question. We will get to that when we talk about your quitting. Let me hand you another document that you produced this morning, a July 11, 1995, letter to Johnny Chung from you. If you will take a quick look at that. Can you explain this letter to me briefly?

Answer. Resignation.

Question. This your resignation letter? It appears in the letter that you have set out several complaints, if I can characterize it that way.

Answer. Yes.

Question. Not having bought the $2.5 million mansion.

Answer. Yes.

Question. Not having opened or not having wired money into the Crestar Bank account.

Answer. Yes.

Question. There is also something about on top of your salary, you would be paid a $500 per month clothing allowance.

Answer. Yes.

Question. He did not pay you for that?

Answer. Actually, I did end up getting reimbursed for that.

Question. It also says——

Mr. ZACKS. After this letter?

The WITNESS. Yeah, I think so. Yes. Yes. Some of it might have been along the way, but there was a Chung—most of it was after the letter.

EXAMINATION BY MS. SAFAVIAN:

Question. Okay. There is a paragraph that says "reflecting on the unfulfilled promises, the Spielberg party, the mansion, cars, driver, maid, rent, equipment for research project, a budget for the project, clothing allowance, et cetera." These are all promises he made to you that were not fulfilled?

Answer. The Spielberg party was the fund-raising event.

Question. Did he promise you you could go to that?

Answer. Yes. In typical Johnny talk, nothing is ever, you know, here is a ticket, would you like to go. It is, you know, I am going to this event. I could get you in. Would you want to go? I think he flew—I think I was actually in LA at the time of that event, but I never went to the event. So, yeah, it was like just one thing after the other.

Question. Do you know who he brought to the event?

Answer. His family. His wife and daughter.

Question. Just the three of them?

Answer. Do you know what? George might have gone to that.

Question. George Liu, L-I-U?

Answer. I think someone else did go. George and his girlfriend, Jenny. I don't know if Jenny went. All I know is I didn't go.

Question. Okay. Had you talked to Johnny Chung about resigning prior to you giving him this letter?

Answer. I don't remember our exact flow of conversation. Ever since I got back from China, things were not good with him. I would call him to say, you know, where is the mansion, where is the money, where is this sort of thing. We definitely had discussions. Certainly, if he would be in town, we would talk. I don't—I mean, I remember a couple of—I remember a couple of specific places we were in conversation, but I honestly don't even remember much of the content.

Question. Let me just mark that letter as GR–25.

[Ratliffe Deposition Exhibit No. GR–25 was marked for identification.]

Ms. SAFAVIAN. Let me hand you another letter from you to Johnny dated——

Ms. AMERLING. For the record, there is no signature on the letter GR–25.

EXAMINATION BY MS. SAFAVIAN:

Question. I am handing you a July 17, 1995, letter that you wrote to Johnny. If you will just take a quick look at that.

Answer. Okay.

Question. Do you recall the context of this letter?

Answer. Not much. Other than what is there.

Question. Were the two of you thinking about trying this again? In the first paragraph, "I am glad we had a chance to talk last week. I appreciate and value our discussion about starting the new chapter?"

Answer. The new chapter was moving on, and I think somewhat trying to do it somewhat amicably. Like both starting new chapters, like I would do mine and he does his. But, no, it wasn't about me continuing with AISI.

Question. You also wrote continuing the first paragraph, "I am sorry about the way our conversation went latter," I suppose it should be later that evening, "and after rethinking everything, I feel our agreement is fair and equitable."

Answer. Yes. He was very angry with me when I—I can't remember if I mailed him my resignation letter or if he was in town and I gave it to him and he read it. But either way, when he heard that I was quitting, that I wanted the money

that he owed me, he was furious, and so I am sure that is what that was referring to, sorry about the way our conversation went, because he was very angry.

Question. Did you have an argument with him?

Answer. Yeah. It was a very difficult conversation for me to have.

Question. Okay. Let me mark that letter as Exhibit GR–26.

[Ratliffe Deposition Exhibit No. GR–26 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Let me hand you another letter, July 18, 1995, letter that you also wrote to Johnny.

Answer. Okay.

Question. I will just read it real quick. As we discussed yesterday, I am faxing you our agreement in writing. I would appreciate your sending me today 2 months' salary and the $4,000 that you said would come from your personal account. Then it continues. What agreement in writing are you referring to there?

Answer. I think this is it. He wanted me to send in writing what——

Question. Let me show you something else produced today. Could that be the agreement?

Answer. No, this came afterwards.

Question. Let's——

Ms. AMERLING. What is that?

Ms. SAFAVIAN. That is a July 20, 1995 letter. Let's stick with the July 18th letter for a moment. You were explaining there was an agreement?

Answer. This is it.

Question. This is it. Okay. That he was going to send you two months salary?

Answer. It must have been in the $4,000 would be—two months salary and 4,000. I think that $4,000 was that would be other things that he needed to reimburse me for, clothing allowance. I don't know if the Morton stuff was in that. It must have tallied up to about that amount. Maybe July rent. I don't know. My guess is that it would be he owed me reimbursement money. I am sure that is what that is.

Question. Did you seek legal representation in this matter?

Answer. Unfortunately, I didn't.

Question. You did——

Answer. Not.

Question. How did the two of you come to this agreement of 2 months severance pay and he would reimburse you the $4,000?

Answer. That was just me.

Question. That was just you. He agreed to that?

Answer. Eventually, yes.

Question. Do you feel now that, you know, that you didn't get everything that was owed to you from Johnny Chung?

Answer. There is a whole chapter. I mean, Johnny was a pain. I was then in—I mean, if you are asking what I really wanted out of the agreement, like this was a negotiation. What I really would have wanted was the entire year's lease paid for. It was basically because of him that I had to enter into this leasing agreement. It was $1,000 for rent is not the amount of rent that I would normally pay for, if I had a normal job. It was a one-bedroom apartment, so I had to end up getting roommates and basically cleaning up a mess that he had created in my life. To be done with things, I was fine about this, about what the negotiation we came to was.

Question. Let me mark that as GR–27.

[Ratliffe Deposition Exhibit No. GR–27 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Do you still have the July 20th letter that I handed you? It is right here. Let's take a look at that right now. It is a letter from Johnny to you dated July 20th. Also attached to it is a release agreement, it looks like. Can you tell me a little bit about this?

Answer. I never signed it.

Question. The release you mean?

Answer. Anything. This came to me, and I looked at it, and I just never signed it. I was just going on with my life.

Question. What did he want you to release him from?

Answer. I think, I haven't read this, I thought it was basically something about how I am not going to ask him for any more money. Johnny was very sensitive about his money, and actually almost paranoid, in my opinion, about people trying to use him for his money. Imagine that. And he was very disturbed with my behavior and thinking that I was trying to—something about swindle money out of him

or something along those lines, when he actually owed me like $4,000 or so. I haven't read this recently, but that is sort of what I remember.

Question. The agreement says "release, acquit and forever discharge Automated Intelligence Systems, Incorporated, and Johnny Chung." There is a whole paragraph on it. You didn't sign this agreement though?

Answer. No.

Question. And he didn't come back later?

Answer. I never heard from him.

Question. You never heard from him again once you got the checks?

Answer. I ran into him once. That has been my only contact with him.

Question. When was that?

Answer. At the Democratic Convention in Chicago, like a year later.

Question. How did that go?

Answer. It was weird. But he was just walking down the hall. I said hello, Mr. Chung. He was fine. He showed me another picture of another kid he has, and it was a fairly brief conversation. He asked me what I was doing, and I said fundraising, and he laughed and that was it.

Question. Let me make this July 20th letter with the release attached GR–28.

[Ratliffe Deposition Exhibit No. GR–28 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Can you tell me briefly, you mentioned earlier you met Irene Wu out in California. What did she do for Johnny Chung?

Answer. She seemed sort of like a secretary, assistant, right-hand person. I don't know what she did for him business-wise, because I wasn't really involved in any of that. She did like the dinner reservations there and worked for the travel agencies in getting all the plane tickets. I think she worked a lot with the schedules over there.

Question. What do you mean by over there?

Answer. In China, in setting up that sort of thing. And I believe Irene had come to Washington on some occasion and like was the, you know, his assistant to help out with the chaperoning and that I—that way, I think.

Question. You mentioned earlier an Art L-I-A-N-G.

Answer. Yes.

Question. What did he do for Johnny Chung?

Answer. I forget what his title was. Some sort of chief of staff. I think Art actually had a real job with the business part, sales of some sort. But Art really liked all the prestige of the political arena, so I think Johnny would kind of like throw these carrots at him or let him go on trips or whatever.

Question. Have you heard of a Steven L-I-N?

Answer. That doesn't sound familiar.

Question. How about a——

Answer. Wait. The little chief engineer that runs the fax machine, like, is behind this bulletproof glass like windowless room. If that is him, I met some little engineer.

Ms. AMERLING. You are not certain that is him?

The WITNESS. I can't remember his name.

EXAMINATION BY MS. SAFAVIAN:

Question. Does a N-A-C-H-I Lee or Nancy Lee mean anything to you?

Answer. Nancy is the accountant, I think.

Question. Where is she located at?

Answer. In LA.

Question. Did you meet her?

Answer. Yes. I think I met her. She works nights, works like all night. She sends me my—the only reason why I had to contact her, like a year later was to get the information I needed for taxes.

Question. So she was his accountant?

Answer. To my knowledge.

Question. How about a Steven H-U-A-N-G?

Answer. Wait, that might—I don't remember the name of the engineer, if that was him or not. There might have been two of them actually.

Question. Okay. How about a Michael Lynn SHIH, C-H-I-E-F?

Answer. Shoot, they all sound familiar. I keep thinking about this one engineer guy. Somebody took me computer shopping and new a lot about computers, and we were supposed to buy a computer for the D.C. office, and was showing me all about different laptops and everything. I don't remember who it was.

Question. Okay. Just a few other names. Ever heard of Peter C-H-A-N-G?
Answer. It sounds familiar, but——
Question. How about Great Wall International Culture Company?
Answer. No.
Question. How about a Susan Chang?
Answer. No.
Question. Also known as S-H-U-C-H-E-N, Chang?
Answer. No.
Question. George H-A-R-A?
Answer. I don't know which George I knew, the fat, chubby guy that tooled around.
Question. How about Ernest Lee?
Answer. That doesn't sound familiar.
Question. Larry L-I-O-U?
Answer. I never new any Larry.
Question. Okay. How about a S-H-I-H, H-U-N-G, Young?
Answer. No.
Question. Any knowledge of and West Environmental Group?
Answer. No.
Question. Professor Q-G-G-E-P-I-N-G.
Answer. No.
Question. George Tan?
Answer. It sounds familiar. I don't know.
Question. And the last name, H-U-I-Y-U-A-N, the last name, Y-A-O?
Answer. That doesn't sound familiar. But you are missing one, Tina.
Question. Tina who?
Answer. I don't know her name.
Question. Was she an employee?
Answer. Yes, to my knowledge.
Question. Do you know what she did for him?
Answer. The same sort of stuff as Irene, sort of PR secretary, whatever. Tina actually—Tina told me some stuff at the end now that I just remember. When I was thinking of quitting, and like at that point obviously I didn't know who I could trust anymore, and wasn't really saying much to people. But I forget where Johnny met Tina. I don't know if he brought her over from China or what.

Tina had some sort of bad situation with a husband and Johnny sort of bailed her out from that. I don't know if he was like—I don't know. Johnny told me all this once about Tina. Then when I was in China, I had this translator that helped me out a lot, that Johnny said he was going to hire her as his translator. Any time he came to China, she was going to have a job translating for whoever needed it. She was excited. She traveled a long ways to come to Beijing away from her family to translate for me. I think Tina knew her somehow. It was like a sister of a friend of her's from going to school in China.

Tina told me in the end Johnny was like scamming this girl, said that he didn't hire her. She didn't take some other opportunity that she was going to. I don't know, it was something along these lines. This was like just confirming all of my wanting to get out of working for him.

But that was Tina.
Question. Okay. Did I forget any other AISI employee that you can recall?
Answer. [Negative nod.]
Question. Is that a no?
Answer. No.
Ms. SAFAVIAN. Okay. I am almost done. If you can believe that. Let me just cover a few other brief things with you.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you know who Harry Wu is?
Answer. Oh, the guy that was detained.
Question. Over in China?
Answer. Yes.
Question. Do you know about Johnny Chung's efforts to help Harry Wu?
Answer. Not specifically, but it doesn't surprise me. Johnny told me something about someone we had dinner with in China, and it kind of freaked me out. I don't know if it was—I don't know if he said we had dinner with one of the guys that was involved with ordering the tanks at Tiananmen or one of the guys that was in charge of detaining Harry Wu or something like that, but I didn't know Johnny was trying to—I don't remember him working on the Harry Wu thing.

Question. This was when you were in China in April?

Answer. Yes.

Question. Let me hand you this document. It is dated 7–25–95. I know that you may have—I don't know if you had completely ceased working with Johnny at that time?

Answer. Yes.

Question. But this is an AISI fax cover page that he—it looks like Irene sent to Betty Currie in the White House. Johnny Chung was asking for President Clinton to write him a credential letter for his trip to China.

You can just flip through the pages. It starts with EOP 005053 and goes through to 57. As you can see, 55 is a letter from Bill Clinton dated October 3, 1994, which is the one Johnny is referencing in this fax cover page. This is one for Taiwan. He wanted one for China. The last page, 57, is one from Don Fowler discussing Johnny Chung's efforts to build a bridge between the people of China and the United States.

Do you have any knowledge of his efforts to get these credential letters?

Answer. No, I didn't. I wasn't working with him then.

Question. He didn't previously before you left him mention how he wanted to help free Harry Wu?

Answer. He might have talked about Harry Wu, because it was in the news a lot. I remember him telling me that I had to like keep up on current events and that sort of thing. Johnny was always trying to get Don Fowler, the First Lady, or anyone over there, I mean, it was this whole bridging thing. But I don't remember specifically. I mean, Johnny never said to me, I want you to write a letter requesting help for Harry Wu, not that I remember.

Question. Okay. Let me mark this group of documents as GR–29, Exhibit GR–29.

[Ratliffe Deposition Exhibit No. GR–29 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. So after you stopped working for Johnny Chung, you were back as a volunteer in the White House?

Answer. Yes.

Question. You had done that on and off while working for Johnny Chung?

Answer. Yes.

Question. Was that then your full-time—what kept you occupied First Lady time?

Answer. I worked there the month of August, and then I started a new job in September, Campus Green Vote.

Question. Okay. And then how much time did you put in as a volunteer in the White House?

Answer. Hardly any then.

Question. Hardly any.

Answer. I worked at Campus Green Vote from September until I think it was like December 4th. Part of that time I was in Seattle working on an environmental referendum. Then I left for Boston December 4th. So I was pretty much tied up with Campus Green Vote stuff.

Question. Okay. Did you ever see Johnny Chung in the First Lady's office after you quit working for him when you were a volunteer?

Answer. Oh, you mean did he come——

Question. Did you ever see him visiting the First Lady's office?

Answer. He might have come back. I don't know if—I don't know if I was in the office then when he did. I remember it being kind of like touchy, either knowing he was going to come, I don't know if they had me run some errand or something. I can't remember exactly.

Question. Okay. Do you recall Johnny sending Evan Ryan and Maggie Williams flowers?

Answer. Yeah. Vaguely, now that you bring it up.

Question. Let me hand you two documents. These are telephone message slips again.

Answer. Uh-huh.

Question. And I think I may have them in reverse order. If you will take a look at EOP 509073 and 4, the message slip is to Evan. It is dated either 9–27 or 29. It is hard to tell if it is a 9, a message from Johnny Chung. It says he is sending two baskets of flowers; one for Maggie, one for you.

Answer. Um-hmm.

Question. Then the next document I hand you is EOP 059058 through 59. It is another message slip to Evan dated 10–20–95. He called again, and on the message slip says sending flowers to you and Maggie.

Do you recall them receiving these two sets of flowers from Johnny Chung?

Answer. I don't see how I would have. I think by that time I was working at Campus Green Vote. He must have brought them flowers sometime when I was working for him or something.

Question. You are thinking of previous times?

Answer. Certainly not the October 1, I wouldn't have known anything about. And I am quite sure I started Campus Green Vote by that time in September. So I wouldn't have been there for that. The only thing I heard about I thought after like I left the White House was that Johnny came for a visit once and for somehow or some reason had to be removed by, I don't know if it was Secret Service, security or something. Like he showed up and he called, I think he wanted to meet with Maggie and Evan said she was busy. She didn't have any time available, and I don't know if he got cleared in from someone else or something, but he just showed up.

Evan was angry, because she was out doing, I don't know, something, and came back and Johnny was like there in the office, and they had to ask him to leave. Something along those lines. Like he was not welcome.

Question. Did Evan have to call the security or the police?

Answer. I don't know what the specifics were. She wasn't the one that told me. There was this old lady volunteer that I kept up. She would tell me stuff like that.

Question. You weren't present that day?

Answer. No, no.

Question. Do you recall when that was?

Answer. It was after I left. I think in the fall maybe.

Question. Of '95?

Answer. I don't know exactly when it was.

Question. Did you ever ask Evan about that incident?

Answer. I might have. Something very casually, like, oh, I heard Johnny got kicked out of the office or something. Like I don't, we didn't sit down and have a serious talk about it that I remember.

Question. Did either Evan, Ryan or Maggie Williams ever mention to you that Johnny sent us flowers?

Answer. I don't remember that. We didn't really talk about that kind of stuff.

Question. Let me just mark those telephone message slips we were discussing as Exhibit GR–30.

[Ratliffe Deposition Exhibit No. GR–30 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Just briefly going back to the Chinese delegation that was in the White House, in the First Lady's office in March of '95, were you—do you have any knowledge whether or not Evan, Ryan or Maggie Williams solicited a contribution from Johnny Chung?

Answer. No.

Question. Are you aware that Johnny Chung handed Maggie Williams a check to the DNC in the amount of $50,000?

Answer. I think the only reason I know about that was because I read about it in the papers, but I don't remember that.

Question. You had no prior knowledge of it before the newspaper articles?

Answer. No.

Question. No one ever talked about it in the First Lady's office?

Answer. No. I mean, there was talk about Johnny and his money and Johnny contributing, definitely, but it was more Johnny the fund-raiser kind of context.

Ms. SAFAVIAN. I believe that is all I have at the moment. Minority counsel will ask you some questions. I want to make sure I didn't miss anything.

EXAMINATION BY MS. AMERLING:

Question. I want to start by thanking you for taking the time to talk with us today. You testified, I believe, that Johnny Chung wasn't fulfilling promises he had made to you.

Answer. Yes.

Question. Is that correct?

Answer. Yes.

Question. I would like to talk about his failure to fulfill promises to you a little bit more.

Answer. Okay.

Question. Now, I believe that you testified that while he paid you a salary, he did not fulfill other promises relating to reimbursing you. Is that correct?

Answer. He reimbursed me eventually.

Question. But there was a time when you were concerned because he did not fulfill his promises to reimburse you?

Answer. Yes. Yes.

Question. I want to turn to the July 11, 1995, letter that we have marked as Exhibit GR–25.

Answer. Okay.

Question. I want to turn to page 2. In the fourth paragraph up from the bottom of the document, it begins reflecting on unfulfilled promises.

Answer. Yes.

Question. Are you following me?

Answer. Yes.

Question. The letter mentions clothing allowance.

Answer. Yes.

Question. Did Mr. Chung make representations to you that he would provide some sort of clothing allowance to you?

Answer. He said that I would be given $500 a month for a clothing allowance.

Question. At the time of this letter, you believed he was not fulfilling that representation; is that accurate?

Answer. I believe so. To the best of my memory, he had not reimbursed me for probably June and July. I know I had bought some clothes. Now I remember, because I thought I was going on this second China trip, so I was preparing for that, and so I needed reimbursements that I hadn't received.

Question. You hadn't received them in accordance with the schedule he had represented he would pay you on?

Answer. Yes. Well, he never—again, he was never specific in that way. It wasn't ever—that is why we were supposed to have this checking account, to my knowledge, so that for these allocations that he made, I would then go and withdraw it from there. Does that answer it?

Mr. ZACKS. Counsel, can I have one moment.

[Discussion off the record.]

EXAMINATION BY MS. AMERLING:

Question. Back on the record. This letter also references unpaid rent. Mr. Chung at this point, the point of the July 11 letter, also had not fulfilled his promise to you regarding rent?

Answer. Yes.

Question. This letter also references a restaurant bill. Mr. Chung at this point also had not fulfilled his promises to you regarding that?

Answer. Correct.

Question. Now, I believe you also testified that when you came back from your China trip, you found that the D.C. office didn't exist. Is that correct?

Answer. Yes.

Question. Is it fair to say he had made representations to you about the terms of your employment that he did not meet?

Answer. As of what we have just discussed?

Question. Yes.

Answer. Definitely.

Question. Would you say that Mr. Chung misrepresented the truth to you?

Answer. Yes.

Question. You also, I believe, testified that Mr. Chung always had a lot of hoopla going on that you had to sort through. When you said that, were you meaning, when you said "sort through," were you meaning you had to sort through what was the truth and what wasn't the truth? Is that accurate?

Answer. Yeah. Again, at the time I was fairly trusting and wasn't naturally that skeptical of him. What I really meant by "sort through" was who knows what Johnny was talking about, mansions, cars, flowers, dinners, trips. It is like okay, what are we doing today? What is happening here?

It wasn't until pretty much that I wrote this letter, when it was like, okay, this guy is not fulfilling anything that he says. So it was like I just didn't believe him anymore at all.

Mr. ZACKS. Can I ask a point of clarification?

Ms. AMERLING. Yes.

Mr. ZACKS. Would it be fair to say that you consider Mr. Chung on reflection and in hindsight a dishonest individual? It is a yes-or-no question.

The WITNESS. Yes.

Mr. ZACKS. Would it be fair to say you felt he took advantage of you and your naivete at that point in your life?

The WITNESS. Yes.

Mr. ZACKS. Would it be fair to say that by and large, nearly everything he promised you did not come to fruition with regard to your employment?

The WITNESS. Absolutely.

Mr. ZACKS. Would it be fair to say that he appeared to you to be—how can I say this—a great exaggerator of the truth?

The WITNESS. Yes.

Mr. ZACKS. Or lack of the truth with individuals?

The WITNESS. Yes.

Mr. ZACKS. And would it be fair to say as far as you could tell, he tried to use everyone round him for his own purposes?

The WITNESS. Yes.

Mr. ZACKS. Okay. Thanks. I just wanted to be clear on that.

EXAMINATION BY MS. AMERLING:

Question. A few more questions. You had testified that when you were in China, I believe you testified, correct me if I am wrong, Mr. Chung was looking for office space, and you had suggested that particular office that had Chinese military outside would not be the best spot and that he agreed. Is that accurate?

Answer. Yes.

Question. And the next day, despite the conversation you had had with him, you heard him telling other people or another person that he was interested in that very office space. Is that accurate?

Answer. The people that owned the office space.

Question. Do you believe he was not telling the truth to that person?

Answer. Yes, that is what I confronted him with. That was very uncomfortable, working with somebody that operated like that.

Question. So based on your experience with Mr. Chung, would you say that you would not rely on his word?

Answer. I couldn't.

Question. Based on your experiences with Mr. Chung, would you say his word is not credible?

Answer. Yes.

Ms. AMERLING. I don't have any further questions.

EXAMINATION BY MS. SAFAVIAN:

Question. Just a couple follow-ups from the documents. Let me just show you, this is something else that you produced today, it looks like a calendar. If you could tell me what that is, please?

Answer. This was a handwritten schedule for the China trip that I didn't have involvement with, other than showing up at things. I don't even know how closely this was followed. I think this was made up sort of towards the beginning of the trip, and I wasn't involved with this schedule.

Question. Does looking at that and some of the names that are listed help refresh your recollection as to some of the people that you met that you mentioned earlier, and you just couldn't think of their names?

Answer. I remember meeting Vice Premier Lee. The China Petrochemical Corporation. The office space. Oh, Charlie Parish. I forgot about him.

Question. Charlie Parish?

Answer. Yes.

Question. Who is he?

Answer. He worked at the American Embassy, and Johnny bugged him, too. I saw Charlie there, and he came to D.C., and we had dinner with him in D.C., too.

Question. Do you know what he bugged him about when he was over in China?

Answer. Charlie tried to be nice about it, but he said Johnny called him and was trying to get in or whatever, and Charlie was trying to do other things or get rid of him, and ended up, like everyone, letting Johnny in and, I don't know if Johnny was working with him on visas or something. I don't know.

Question. Let me just mark that—do you recognize anything else? Does that help you with anybody else?

Answer. Not really.

Question. Okay. Let me just mark that as Exhibit GR–31.

[Ratliffe Deposition Exhibit No. GR–31 was marked for identification.]

Mr. ZACKS. Earlier when you had referenced a $50,000 payment by Mr. Chung to DNC, what was the date of that check or the date it was tendered?

Ms. SAFAVIAN. I can put into the record an L.A. Times article dated July 27, 1997, that sets forth Johnny Chung's version of the delegation and the First Lady's office,

and the White House tour, the mess and the photo with the First Lady and the $50,000 check that he handed to Maggie Williams.

Mr. ZACKS. Okay.

Ms. SAFAVIAN. Would you like me to make that an exhibit?

Mr. ZACKS. Not necessarily. I am happy to just review it.

EXAMINATION BY MS. SAFAVIAN:

Question. Let me just show you another thing real quick. This is something else you produced. It looks like pages of copies of business cards and a printout of names and addresses. Let me hand that to you. Can you explain to me what that is?

Answer. It was something Johnny gave to me with the rest of his correspondence. He kept his business cards in this plastic-covered thing, and he just made Xeroxed copies of it. I think it was most of his like D.C. or political contacts, I mean that he considered his contacts.

Question. Was this like for you to keep and if you needed to contact these people? Why do you have possession of this?

Answer. It wasn't really discussed. I think it must have been in the stack he gave me of all of this correspondence from before I started working for him until after.

Question. So you did not put that together for him?

Answer. No. He has this.

Question. That was already done?

Answer. Yes.

Question. Okay. Let me make that Exhibit GR–32.

[Ratliffe Deposition Exhibit No. GR–32 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Then, lastly, also in the documents you brought with you today, there are a couple of letters. I am just going to kind of group them together. There is an October 3, 1994, letter from Bill Clinton to Johnny Chung, an October 13, 1994, letter to Johnny Chung from Al Gore, a March 14, 1995, letter to the Honorable Zheng Hongye, the Chairman of the China Chamber of International Commerce, from Don Fowler.

Let me hand these three letters to you. I am just interested in why you have possession of those three letters, since they were before the date of your employment with Johnny Chung?

Answer. When I went to LA, Johnny just handed me this stack of papers, literally in a stack, of political correspondence that he had, that was either DNC-related or whatever, and I kept it in this stack of stuff.

Question. Did he ever tell you what he wanted you to do with it?

Answer. No. It was just like, here.

Question. Did you ever do anything with it?

Answer. No.

Ms. SAFAVIAN. Okay. Let me just group those three letters together and make those Exhibit GR–33.

[Ratliffe Deposition Exhibit No. GR–33 was marked for identification.]

Ms. SAFAVIAN.

Question. Let me show you what I just came across. You were mentioning earlier you thought in the brochures he was handing out in China there was a group of letters. I just handed you a group of letters that you produced this morning. Could you tell me, is that what you were referencing earlier?

Answer. Yes.

Question. And this grouping is what he would—you tell me. What did he do with these letters?

Answer. I don't know about this particular packet. I wasn't involved with this. The packets I know about are the color-copied ones that—I didn't have anything to do with them actually except make sure I had enough to hand out to people when we were in China for that day's meetings. So as far as putting them together or anything like that——

Mr. ZACKS. The question was earlier you indicated that during the China trip you recalled a packet also being disseminated, either in conjunction with those or independently, that were braggadocio letters from Al Gore, the President, other dignitaries, to impress officials. The question was, do you recognize these letters as those documents you earlier referred to?

The WITNESS. I don't remember packets in China being handed out that were—that letters were included with. I only in my—in the last 48 hours in preparing these materials for today, saw this packet and flipped through it and realized that he included letters.

To the best of my ability, I think, AISI and whatever else this says, it is a company profile sort of thing that he would have handed out to people, but I didn't——

Mr. ZACKS. You don't have personal knowledge that he did?

The WITNESS. Correct.

EXAMINATION BY MS. SAFAVIAN:

Question. I thought you said earlier that you do recall there was some package like that when you were in China.

Answer. No.

Question. That is not the case.

Answer. No.

Ms. SAFAVIAN. Since we referenced that, let me mark that GR–34.

[Ratliffe Deposition Exhibit No. GR–34 was marked for identification.]

Ms. SAFAVIAN. I think I am done. That is all that I have. Do you have anything further?

Ms. AMERLING. I don't have any further questions.

Ms. SAFAVIAN. Thank you very much.

Mr. ZACKS. I would only state on the record then that A, I would make a formal request for a copy of the transcript, if you would be so kind to forward it to my office, as opposed to us going to Washington to review it.

Ms. SAFAVIAN. Like I mentioned earlier, we can send you a confidentiality letter which you both have to sign and then we can send out the transcript for you to review.

Mr. ZACKS. Secondly, and then just to confirm, we are going to give you certain brochures and cards and the like, that are originals, and you have agreed that you will copy those and send them back to my office.

Ms. SAFAVIAN. That is correct. What I was planning on taking are the two AISI color brochures, a stack of business cards, and I can count these up real quick.

My quick count, I believe there are 69 business cards, that I was also planning on taking with me. Additionally, there were some of the brochures that you brought back from China that we had already mentioned on the record that I was also going to take back with me. That was it.

Mr. ZACKS. Okay. Then just for a final point of clarification, earlier in the preamble or the instruction portion of your questioning, and I just want to be clear, is the area of my client not discussing her testimony here today, is that an informal request by Congress, or does that request carry the rule of law much like 6(e) does with a grand jury in Federal court? Is she by law prohibited and/or myself from discussing her testimony here today?

Ms. SAFAVIAN. This deposition was taken in executive session, which means that it is not discussed publicly with anyone outside of the committee and/or Members of Congress.

Mr. ZACKS. Is that a matter of protocol or law? That is my question.

Ms. SAFAVIAN. That is under the committee rules. With regard to you and your client, I was going to say I don't——

Ms. AMERLING. It is my understanding that is a request the Majority makes.

Ms. SAFAVIAN. I believe it is voluntary on your point. My only point is we do not release this deposition unless the committee votes to release it. It stays under executive session.

Ms. AMERLING. "We" meaning the committee.

Ms. SAFAVIAN. Is that your understanding of it? Sam.

Ms. AMERLING. That is my understanding of how your request, of what your request means.

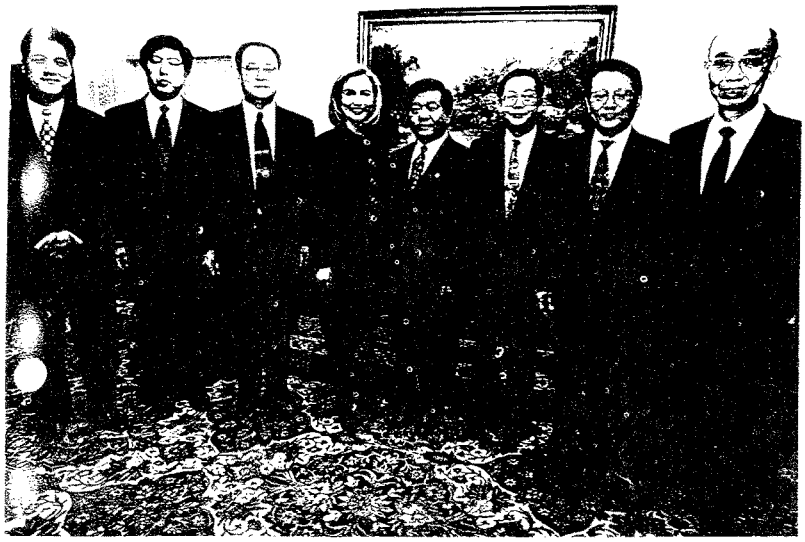
Mr. ZACKS. Okay. I am clear. Thank you.

Ms. SAFAVIAN. Okay. That is all. Thank you.

[Whereupon, at 4:45 p.m., the deposition was concluded.]

[The exhibits referred to follow:]

EXHIBIT
GR 1



Members of the China Delegation, Mr. Zheng (Chairman of the China Chamber of Int'l Commerce).
Mr. Yan (China Petro-Chemical Corp.), Mr. Huang (China Int'l Trust & Investment).
Mr. Wang (Shanghai AJ Corp.), Mr. Yu (Chief, American & Oceanian Division, Liaison Dept.,
China Chamber of int'l Commerce) and Mr. Sun (the young entrepreneur from Xinjiang)
with First Lady Hillary at the First Lady Office.

在大公司董事長、中國企業家代表團一行：鄭鴻業會長（商會）、
閻長春總經理（中石化）、黃中長總經理（中信）、王仁中總經理（二信投資）、
王新紅處長（商會美大洋處）、孫先生的友人及青年企業家孫先生。
合影於第一夫人辦公室。

EXHIBIT
GR2

SEARCH: FEBRUARY 1994

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
940202	CHUNG	JOHNY	U73548	BOTWIN	FOUCART	1	13:18	00201	13:27	

599

EXHIBIT
GR3

COMMITTEE ACCESS

EOP 008708

SEARCH: JULY 1994

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
940722	CHUNG	JOHNNY	U49607	ANDERSON	ANDERSON	113	14:26	H0201	0:00	
940721	HUANG	JOHN	U47980	CARTER	POTUS	480	18:17	H0102	0:00	

600

COMMITTEE ACCESS EOP 008700

SEARCH AUGUST 1994

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
940802	CHUNG	JOHNNY	U53397	LEWIS	LEWIS	474	7:35	W0101	8:46	
940804	CHUNG	JOHNNY	U55276	ANDERSON	ANDERSON	119	11:45	W0201	15:07	
940805	CHUNG	JOHNNY	U55663	DICKEY	POTUS	S. LAWN	9:39	A0101	10:32	
940808	CHUNG	JOHN	U56778	ATTA	LEWIS	110	15:06	00201	15:49	
940811	CHUNG	JOHNNY	U58540	ANDERSON	ANDERSON	110	15:34	00201	0:00	
940812	CHUNG	JOHNNY	U59123	ANDERSON	LEWIS	110	17:36	00201	0:00	
940802	HUANG	JOHN	U53397	LEWIS	LEWIS	474	7:35	00101	8:46	

601

COMMITTEE ACCESS EOP 18698

SEARCH: MAY 1995

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
930319	CHUNG	JOHNNY	U66214	SHULMAN	MATSUI	450	14:34	00101	0:00	
930304	CHUNG	JOHNNY	U60497	RYAN	RYAN	100	15:05	00101	16:12	
930426	HUANG	JOHN	U55071	KANG	KANG	474	8:34	00102	0:00	
930421	HUANG	JOHN	U54712	RAMSEY	RAMSEY	472	10:13	80401	0:00	
930402	HUANG	JOHN	U46398	WEAVER	WEAVER	131	14:11	00203	0:00	
930319	HUANG	JOHN	U66214	SHULMAN	MATSUI	450	14:36	00101	0:00	
930302	HUANG	JOHN	U59162	RAMSAY	CLAUSSEN	476	13:00	00401	0:00	
930311	HUANG	JOHN	U63107	EDER	EDER	180	13:44	00401	0:00	
930427	HUANG	JOHN	U57128	EDER	EDER	122	13:52	00401	0:00	

COMMITTEE ACCESS

J08680

SEARCH: MARCH 1995

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950324	CHUNG	JOHNNY	U42671	RYAN	RYAN	100	9:46	00102	0:00	
950308	CHUNG	JOHNNY	U35371	BAILEY	BAILEY	174	10:15	00202	10:18	
950309	CHUNG	JOHNNY	U36035	RYAN	RYAN	100	11:37	00102	0:00	
950315	CHUNG	JOHNNY	U38788	RYAN	RYAN	100	13:21	00101	0:00	
950313	CHUNG	JOHNNY	U37545	RYAN	RYAN	100	13:40	00101	0:00	
950309	CHUNG	JOHNNY	U36174	RYAN	RYAN	100	14:11	00102	0:00	
950310	CHUNG	JOHNNY	U36758	TARMEY	TARMEY	100	14:17	00102	0:00	
950314	CHUNG	JOHNNY	U38266	RYAN	RYAN	100	14:57	00102	14:58	
950313	CHUNG	JOHNNY	U37718	RYAN	RYAN	100	17:07	00102	0:00	

COMMITTEE ACCESS

EOP 583

REPO 0 04VG7705 WA PAGE

RUN DATE 93/02/01 VISITOR SUMMARY FOR 93/01

VISITOR		VISITEE	UIN	TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TO-	PDA
CHUNG	JOHNNY	DUNN	U14337	1343	930111	O	115	DUNN	M	321634	1317	002
CHUNG	JOHNNY	MIDDLETON	U15025	1100	930112	O	176	MIDDLETON	M	000020	1044	001
		JOHNSON	[illegible]	0740	930123	O	87	JOHNSON		001361	0738	002
CHUNG	JOHNNY	DUNN	U21312	1302	930130	O	113	DUNN	G	000000	1300	002
		TERNEY	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]					
CHUNG	JOHNNY	FRANKFURTER	U13496	0749	930110	W	100/EW	FRANKFURTE	M	******	****	***
CHUNG	JOHNNY	MIDDLETON	U14998	1700	930112	O	176	MIDDLETON	M	001333	1704	002
	MARC	FRIDMAN	[illegible]	[illegible]	[illegible]							

604

COMMITTEE ACCESS

REDACTED

EOP 005039

VISITOR		VISITED	TIME	DATE				REQUESTS	BADGE			
CHUNG	JOHNNY	HALLEY	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	BAILEY	B	000000	1013	002
CHUNG	JOHNNY	RYAN	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	RYAN		156600	[illegible]	001
CHUNG	JOHNNY	RYAN	0356174	1500	950309	O	100	RYAN	E	434300	[illegible]	001
CHUNG	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]				
CHUNG	JOHNNY	[illegible]	0356769	1415	950310	O	100	TARNEY	H	012630	[illegible]	001
CHUNG	JOHNNY	POTUS	0370980	1610	950311	W	WW	CRANFORD		[illegible]	[illegible]	[illegible]
CHUNG	JOHNNY	RYAN	0372945	1320	950312	O	100	RYAN	E	343410	1340	001
CHUNG	JOHNNY	RYAN	0377118	1716	950313	O	100	RYAN		202515	1707	001
CHUNG	JOHNNY	RYAN	0378088	1506	950314	O	100	RYAN		321321	1457	001
CHUNG	JOHNNY	RYAN	0378789	1315	950315	O	100	RYAN	E	789979	1311	001
CHUNG	JOHNNY	RYAN	0382471	1006	950324	O	100	RYAN	E	000231	0946	001
CHUNG	TONY	MAYNOR	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]				

COMMITTEE ACCESS

REDACTED

EOP 005038

2/27/96 08:45:08 AM

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POS	TOD
940920	CHUNG	JOHNNY		U72297	LEWIS	LEWIS	116	14:07	002	0.
940921	CHUNG	JOHNNY		U72389	KELLY	QUINN	276	15:23	001	15:
940923	CHUNG	JOHNNY		U74202	LEWIS	LEWIS	113	17:33	002	0:
940926	HUANG	JOHN		U74759	WILSON	KRISTOFF	230	17:42	004	0.
940927	HUANG	JOHN		U76119	WEAVER	WEAVER	131	11:02	001	0

COMMITTEE ACCESS

EOP 003738

SEARCH OCTOBER 1994

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
941005	CHUNG	JOHN	U78587	SHAKOW	SHAKOW	110	10:48	00201	0:00	
941028	CHUNG	JOHNNY	U87935	ANDERSON	ANDERSON	110	10:24	00202	13:05	
941005	HUANG	JOHN	U78362	MIDDLETON	MIDDLETON	W	8:16	A0402	12:14	
941014	HUANG	JOHN	U82068	BURGET	BURGET	10103	10:04	K0102	11:19	

COMMITTEE ACCESS

EOP 008694

VISITOR SUMM

VISI		VISITEE		TIME	DATE	LOC	ROOM	REQUESTOR		BADGE	TOA	POA
CHUNG	JOHNNY	EDER	U09217	1500	941101	O	123	EDER	A	000323	1447	001
			09313	0700	941102	O	87				0712	002
CHUNG	JOHNNY	MITCHELL	U98568	1145	941129	O	487	WOZNIAK	N	007958	1130	002

COMMITTEE ACCESS

REDACTED

RUN VISITOR SUMMA 94/12

VISITOR		VISITEE		TIME	DATE	LOC	ROOM	REQUESTOR		
CHUNG	JOHNNY	LEWIS	U07470	1330	941219	U	115	DUNN		
CHUNG	JOHNNY	ANDERSON	U07496	1300	941219	O	115	ANDERSON	K	
CHUNG	[illegible]	[illegible]	U07852	2000	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	
CHUNG	JOHNNY	DUNN	[illegible]	1310	941227	U	115	DUNN		
CHUNG	JONATHON	BROWN	[illegible]	0900	[illegible]	U	[illegible]	[illegible]		
CHUNG	JOHNNY	POTUS	U08186	1930	941220	W	RESIDENCE	BURKE		0000 VIS
			[illegible]	2000						

COMMITTEE ACCESS

REDACTED

EOP 005040

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITER	ROOM	ARRIVE TIME	POST	TOD	TO
930519	AHN	HI		U66214	SHULMAN	HATSUI	450	14:34	H0101	0:00	

COMMITTEE ACCESS

930524	CHUNG	JOHNNY		U68274	RYAN	RYAN	100	11:01	00102	14:16	
930503	CHUNG	JOHNNY		U69809	RYAN	RYAN	100	13:28	00102	13:42	
930519	CHUNG	JOHNNY		U66622	RYAN	RYAN	100	14:04	00101	14:33	

EOP 00[illegible]17

COMMITTEE ACCESS

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	100	TO
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930710	CHUNG	JOHNNY		U85730	RYAN	RYAN	100	15:11	D0101	16:04	
930711	CHUNG	JOHNNY		U86559	RYAN	RYAN	100	16:34	D0101	17:23	
930710	HUANG	JOHN		U85773	EDEE	HDEK	100	16:09	D0102	17:40	

REPORT NO. WAVO2395 WAV PAGE N 195

RUN DATE . 93/08/01 VISITOR SUMMARY FOR 93/07

VISITOR		VISITEE	VIN	TIME	DATE	LOC	ADDR	REQUESTOR	BADGE	10A	P04
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	POTUS	U03990	1830	930711	W	STATE F	WIDDESS	W ******	****	***

612

COMMITTEE ACCESS

REDACTED

EOP 005035

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVAL TIME	POST	TOD	TO
930929	CHUNG	JOHNNY		U13995	RYAN	RYAN	100	10:36	H0101	12:02	
930926	CHUNG	JOHNNY		U14495	RYAN	RYAN	100	11:32	H0102	13:49	
930925	CHUNG	JOHNNY		U14228	RYAN	MCCOY	103/EW	16:34	A0101	17:22	
930914	HUANG	JOHN		U10296	SCHIFF	SCHIFF	WW	12:17	A0402	13:29	
930913	HUANG	JOHN		U10018	CAMERON	HERNREICH	WW	17:15	A0402	18:03	
930914	HUANG	JOHN		U10155	WEAVER	WEAVER	WESTWIN	9:23	A0402	10:40	

COMMITTEE ACCESS

EOP 003710

RE NO: WAV07785

RUN DATE 95/11/02

VISITOR			VISITEE			UIN	TIME	DATE	ROOM	REQUESTOR	DOU	TOA
CHUNG	JOHNNY		RYAN			U22055	1030	951016	100	RYAN	R	1030
CHUNG	JOHNNY		RYAN			U23094	1320	951018	100	RYAN		1345
CHUNG	JOHNNY		RYAN			U23680	1600	951019	100	RYAN		1627
CHUNG	SUK	K	[illegible]			[illegible]	[illegible]	[illegible]	[illegible]	[illegible]		
CHUNG	JOHN	L	PHILIPS			U28122	1130	951028	476	PHILIPS	I	[illegible]
CHUNG	PATRICIA	T	PHILIPS			U28123	1130	951028	476	PHILIPS	I	***
CHUNG	JOHN	L	BROWN			U28187	1130	951028	476	BROWN	R	1133

COMMITTEE ACCESS

REDACTED

EOP 005032

12/27/ 09:37:32 AM

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD
951208	CHUNG	JOHNNY		U40864	MCCOY	MCCOY	101/EW	14:04	00102	14:32
951221	HUANG	JOHN		U48449	HEISTAD	SCOTT	110	14:24	00101	13:07
951218	HUANG	JOHN		U44096	EDER	MATSUI	122	13:57	00101	17:31
951216	HUANG	JOHN		U43716	CAMERON	POTUS	WW	3:39	A0401	10:

615

COMMITTEE ACCESS

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVAL TIME	POST	TOD
960209	CHUNG	JOHNNY	U59226	RYAN	RYAN	100	14:29	00102	15:15
960216	HUANG	JOHN	U61367	EDER	MATSUI	122	14:00	00101	15:[illegible]
960209	HUANG	JOHN	U58779	EDER	MATSUI	WW	16:36	A0402	20:[illegible]

COMMITTEE ACCESS

EOP 008663

REPORT NO: UAV07705 WAVES PAGE NO 117

RUN DATE 96/07/01 VISITOR SUMMARY FOR 96/06

VISITOR		VISITEE		UIN	TIME	DATE	ROOM	REQUESTOR		TOA
CHUNG	JOHNNY	FORSTER		U09243	1500	960613	WH	FORSTER	S	1501

COMMITTEE ACCESS

REDACTED

EOP 005029

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

April 5, 1995
(Via Fax 202 456-6244)

Margaret Williams
Assistant to the President and
Chief of Staff to the First Lady
The White House
Washington, D.C. 20506

Dear Ms. Williams,

I have an important issue here that needs your assistance. As you always know, I am 100% supportive of the First Lady's Office and I am always delighted to work with DNC at every occasion. The China Business Delegation led by Chairman Zheng Hongye met with President Clinton and took some pictures after the radio address on March 11, 1995. It's been over three weeks, I have not seen any of the pictures. I have learned from Mr. Richard Sullivan of DNC that the National Security Council is holding on to those pictures.

In my opinion, if we allow them to take the pictures with our President then we should be courteous enough to let them have the pictures. I am going to China next week and I do need to bring those pictures with me. I have run out of excuses to tell them why the pictures are taking forever. I really appreciate your help in solving this minor issue.

I look forward to seeing you this weekend at Mr. Steven Spielsberg's party. Thank you again for everything.

Sincerely,

Johnny Chung
Chairman/CEO
AISI

Thank you!

JC:iw

EXHIBIT
GR4

FAXED

JCH15014

COPY
from ORM
5618

To: Fran

Date: 4/3 Time: 4:50

WHILE YOU WERE OUT

M: Johnny Chung

of:

Phone: 1803-799-1736

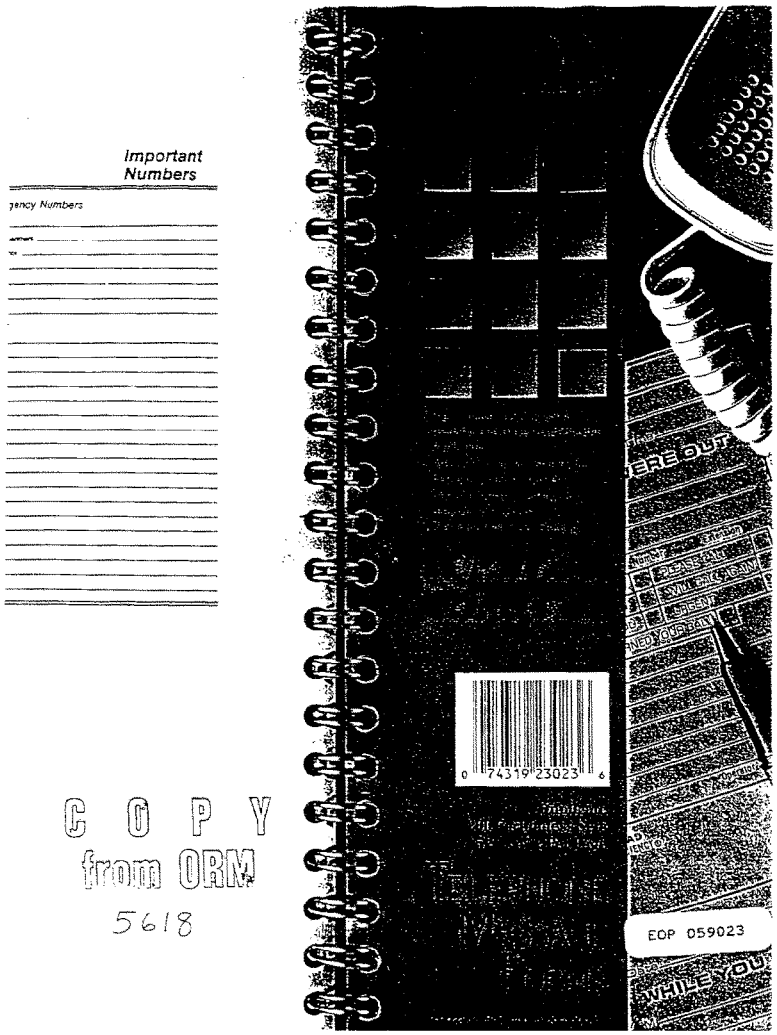
Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message: Re: Pictures.
(Accidentally he called for Thom
who is right here & then
he asked for you)

Operator: Ai

AMPAD EFFICIENCY® 23 EOP 059024



COPY
from ORM
5618

To Dan

Date 4-7 Time 2:30

WHILE YOU WERE OUT

M. Irene

of AISI

Phone

Area Code Number Extension

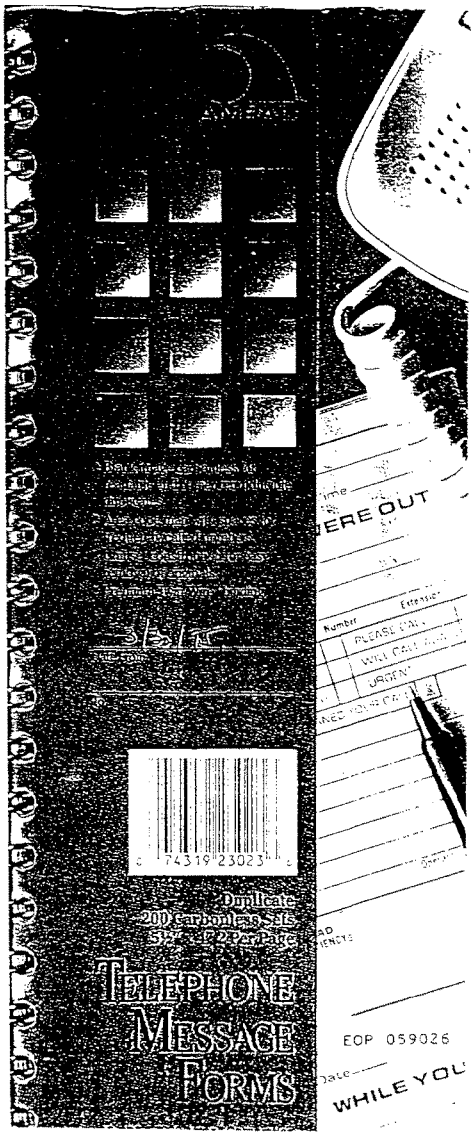
TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Pictures

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

EOP 059025



COPY
from ORM
5618

To: Maria

Date 4/7 Time 12:40

WHILE YOU WERE OUT

M. [illegible]

of (AISI) [illegible]

Phone 318-328-3883

Area Code Number Extension

TELEPHONED		PLEASE CALL	✓
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

Date of Photo

3/11/95

EB

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

欣旅
欣遊

TOPS INTERNATIONAL TRAVEL
505 SOUTH ATLANTIC BLVD.
ALHAMBRA, CA. 91801
(818) 281-6998
FAX: (818) 281-8308

SALES PERSON: 71 ITINERARY/INVOICE NO. 0045377 DATE: 10 APR 9
CUSTOMER NBR: 010071 RRZUVW PAGE: 01

TO: AISI

FOR: CHUNG/JOHNNY MR

---

12 APR 95 - WEDNESDAY					
AIR	UNITED AIRLINES		FLT:897	BUSINESS	LUNCH
	LV LOS ANGELES			1235P	EQP: BOEING 747 400
13 APR 95 - THURSDAY					
	AR TOKYO	NARITA		400P	NON-STOP
AIR	UNITED AIRLINES		FLT:803	BUSINESS	DINNER
	LV TOKYO	NARITA	TERM:1	510P	EQP: 741
	AR BEIJING			835P	NON-STOP
25 APR 95 - TUESDAY					
AIR	UNITED AIRLINES		FLT:802	BUSINESS	LUNCH
	LV BEIJING			940A	EQP: 741
	AR TOKYO	NARITA		250P	NON-STOP
AIR	UNITED AIRLINES		FLT:890	BUSINESS	DINNER
	LV TOKYO	NARITA	TERM:1	415P	EQP: BOEING 747 400
	AR LOS ANGELES			1010A	NON-STOP
OTHER	BEIJING				
	CH				
	FULL PYMNT			CHUNG J	2,670.00

TOTAL BASE	2,670.00
TOTAL TAX	0.00
TOTAL AMOUNT DUE	2,670.00

EXHIBIT
GR 6

欣旅
欣遊

TOPS INTERNATIONAL TRAVEL
505 SOUTH ATLANTIC BLVD.
ALHAMBRA, CA. 91801
(818) 281-6996
FAX: (818) 281-8308

ALES PERSON: 71
CUSTOMER NBR: 010071

ITINERARY/INVOICE NO. 0045398
RKBGKU

DATE: 10 APR 9
PAGE: 01

TO: AISI

FOR: RATLIFFE/GINA

12 APR 95 - WEDNESDAY				
AIR	[illegible]			
	LV LOS ANGELES		1235P	EQP: BOEING 747 400
13 APR 95 - THURSDAY				
	AR TOKYO	NARITA	400P	NON-STOP
	RATLIFFE/GINA	SEAT-31E		
AIR	UNITED AIRLINES	FLT:803	ECONOMY	DINNER
	LV TOKYO	NARITA TERM:1	510P	EQP: 741
	AR BEIJING		835P	NON-STOP
	RATLIFFE/GINA	SEAT-31G		
[illegible] APR 95 - TUESDAY				
AIR	UNITED AIRLINES	FLT:802	ECONOMY	LUNCH
	LV BEIJING		940A	EQP: 741
	AR TOKYO	NARITA	250P	NON-STOP
	RATLIFFE/GINA	SEAT-24G		
AIR	UNITED AIRLINES	FLT:890	ECONOMY	DINNER
	LV TOKYO	NARITA TERM:1	415P	EQP: BOEING 747 400
	AR LOS ANGELES		1010A	NON-STOP
	RATLIFFE/GINA	SEAT-30G		
AIR	UNITED AIRLINES	FLT:2	ECONOMY	LUNCH
	LV LOS ANGELES		115P	EQP: AIRBUS A320
	AR WASHINGTON DULLES		900P	NON-STOP
OTHER	BEIJING			
	CH			
	FULL PYMNT		RATLIFFE G	1,220.00

TOTAL BASE	1,220.00
TOTAL TAX	0.00
TOTAL AMOUNT DUE	1,220.00

EXHIBIT
GR7

REIMBURSE/CHECK REQUEST

DATE: 4-4-95 AMOUNT: $ 398- **PAID** #87 = 9/5/95

REIMBURSE TO: Tops Travel

ADDRESS: 505 S. Atlantic Blvd Alhambra CA 91801

RE: Gina Ratliffe's plane ticket LAX ↔ Washington D.C.

☑ ✉ Mail check to the above address. ☐ ☞ Return $$ to person requesting.

☐ ☞ Return check to _____. ☐ ⊖ Need $$ by ASAP.

REQUESTED BY: Irene Wu APPROVED BY: [signature]

EXHIBIT GR 8

JC02932

UNITED AIRLINES

PASSENGER TICKET AND BAGGAGE CHECK

PASSENGER RECEIPT SITI

2183665162

C 08130-0

RATLIFFE/GINA MS

DCAIR US11APR95

SV620U/UA M1TV8DCA 0

NOT VALID FOR TRANSPORTATION

THIS IS YOUR RECEIPT

048050

FP 27 FC 11APR DCA UA X/ORD

UA LAX 280.91 USD280.91 END XFDCA3ORD3

FARE USD280.91

TAX US28.09

TAX XF6.00

TOTAL USD315.00

0618272527 3

0 016 2183665162 1

UNITED AIRLINES

2183665162

RATLIFFE/GINA MS

DCADRDUA 601 M11APR

XORDLAXUA 105 M11APR

NOT VALID FOR TRAVEL

0 016 2183665162 1

EXHIBIT

GR9

JC02845

PASSENGER TICKET AND BAGGAGE CHECK
PASSENGER COUPON

NOTICE/CONDITIONS OF CONTRACT

Issued by the Carrier whose name is in the "Issued By" section on the face of the Passenger Ticket and Baggage Check.

If the passenger's journey involves an ultimate destination or stop in a country other than the country of departure the Warsaw Convention may be applicable and the Convention governs and in most cases limits the liability of carriers for death or personal injury and in respect of loss of or damage to baggage. See also notices headed "Advice to International Passengers on Limitation of Liability" and "Notice of Baggage Liability Limitations".

1. Issued in the contract "ticket" means the passenger ticket and baggage check, of which these conditions and the notices form part, "carriage" is equivalent to "transportation", "carrier" means all air carriers that carry or undertake to carry the passenger or his baggage hereunder or perform any other service incidental to such air carriage, "WARSAW CONVENTION" means the Convention for the Unification of Certain Rules Relating to International Carriage by Air signed at Warsaw, 12th October 1929, or that Convention as amended at The Hague, 28th September 1955, whichever may be applicable.

2. Carriage hereunder is subject to the rules and limitations relating to liability established by the Warsaw Convention unless such carriage is not "international carriage" as defined by that Convention.

3. To the extent not in conflict with the foregoing carriage and other services performed by each carrier are subject to: (i) provisions contained in this ticket, (ii) applicable tariffs, (iii) carrier's conditions of carriage and related regulations which are made part hereof (and are available on application at the offices of carrier), except in transportation between a place in the United States or Canada and any place outside thereof to which tariffs in force in those countries apply.

4. Carrier's name may be abbreviated in the ticket, the full name and its abbreviation being set forth in carrier's tariffs, conditions of carriage, regulations or timetables; carrier's address shall be the airport of departure shown opposite the first abbreviation of carrier's name in the ticket; the agreed stopping places are those places set forth in this ticket or as shown in carrier's timetables as scheduled stopping places on the passenger's route; carriage to be performed hereunder by several successive carriers is regarded as a single operation.

5. An air carrier issuing a ticket for carriage over the lines of another air carrier does so only as its agent.

6. Any exclusion or limitation of liability of carrier shall apply to and be for the benefit of agents, servants and representatives of carrier and any person whose aircraft is used by carrier for carriage and its agents, servants and representatives.

7. Checked baggage will be delivered to bearer of the baggage check. In case of damage to baggage moving in international transportation complaint must be made in writing to carrier forthwith after discovery of damage and, at the latest, within 7 days from receipt; in case of delay, complaint must be made within 21 days from date the baggage was delivered. See tariffs or conditions of carriage regarding non-international transportation.

8. This ticket is good for carriage for one year from date of issue, except as otherwise provided in this ticket, in carrier's tariffs, conditions of carriage, or related regulations. The fare for carriage hereunder is subject to change prior to commencement of carriage. Carrier may refuse transportation if the applicable fare has not been paid.

9. Carrier undertakes to use its best efforts to carry the passenger and baggage with reasonable dispatch. Times shown in timetable or elsewhere are not guaranteed and form no part of this contract. Carrier may without notice substitute alternate carriers or aircraft, and may alter or omit stopping places shown on the ticket in case of necessity. Schedules are subject to change without notice. Carrier assumes no responsibility for making connections.

10. Passenger shall comply with Government travel requirements, present exit, entry and other required documents and arrive at airport by time fixed by carrier or, if no time is fixed, early enough to complete departure procedures.

11. No agent, servant or representative of carrier has authority to alter, modify or waive any provision of this contract unless authorized by a corporate officer of carrier.

UNITED AIRLINES

PASSENGER TICKET AND BAGGAGE CHECK

PASSENGER RECEIPT

2183665162

C 08190-0

DCATR US11APR95

RATLIFFE/GINA MS

SVE20U/UA M1TVRDCA

THIS IS YOUR RECEIPT

048050

NOT VALID FOR TRANSPORTATION

FP 27 FC 11APR DCA UA X/ORD

UA LAX 280.91 USD280.91 END XFDCA3ORD3

USD280.91
US28.09
XF6.00
USD315.00

0618272527 5

0 016 2183665162 1

UNITED AIRLINES

2183665162

RATLIFFE/GINA MS

DCAORDUA 601 M11APR

ORDLAXUA 165 M11APR

NOT VALID FOR TRAVEL

0 016 2183665162 1

PETTY CASH

DATE 4/11/95

FOR AIR TICKET

AMOUNT 315.00

LAX/DC/LAX

APPROVAL

GINA

ACCOUNT

NUMBER

RECEIVED FOR

SC1154

PETTY CASH

DATE 4/11/95	FOR VISA
AMOUNT 80.00	TO CHINA
APPROVAL	FOR GUNA
ACCOUNT	
NUMBER	RECEIVED FOR [illegible]

SC1156

JC02847

EXHIBIT
GR 10

Consulate-General of P.R.C.
443 Shatto Place
Los Angeles, CA 90020
Tel: 213-380-2507

收據(取單)
RECEIPT FOR PICK-UP

務請憑此條取證件
Date of Pick up
取證日期
IMPORTANT: Please pick up your passport & document with this RECEIPT.

收到 Received from Mr./Madam GINA 先生 夫人 NO. 19999

1 本護照 Passport(s) 本回美證 Re-entry Permit (s) 份綠卡 Green Card(s) 份公證書 Certificate (s)

費用(現金支票) Fee (Cash/Check) $ 80 美元

經手人: By:

日期: 19 85 年 11 月 11 日 Date:

簽證			旅行證	護照	公證	認證	護延	護注	其他	備註:
團體	回	外								Fm-12-30

JC02848

Consulate-General of P.R.C.
443 Shatto Place
Los Angeles, CA 90020
Tel: 213-380-2507

收據(取單)
RECEIPT FOR PICK-UP

領簽證取件取單
Date of pick up
Name
IMPORTANT: Please pick up your passport or document within the period

收到 GINA
Received from Mr./Madam

No. 1944

本護照
Passport(s)

特回美簽
Re-entry Permit(s)

費用(現金支票) 80 美元
Fee (Cash/Check) $

簽證 圖騰 同 外 旅行證 護照 公證 認證 護照 戒指 其他 備註

PETTY CASH

DATE 4/11/95
AMOUNT 80.00
APPROVAL
ACCOUNT
NUMBER

FOR VISA
To Claire
FOR Gina
RECEIVED FOR

668

JC03164

PASSENGER TICKET AND BAGGAGE CHECK

NORTHWEST AIRLINES

PASSENGER RECEIPT 10

012525APR95 C08083661 SITI U

RATLIFFE/GINA

NOT VALID FOR

**TRANSPORTATION*

THIS IS YOUR RECEIPT

LAXNWCTT 580.91 NWWAS 358.18 $939.09END NW XF LAX3DTW3

PAID

#976 6/1/95

USD 939.09

US 93.91

XF 6.00

USD 1039.00

01200580518131

012 2115138437 6

RATLIFFE/GINA

LOS ANGELES

NW 32Y 25APR Y26

DETROIT/METRO

NW 148BY 30APR Y26

WASHINGTON/DULLES

NOT VALID FOR TRAVEL

012 2115138437 6

AmericanAirlines

PASSENGER TICKET AND BAGGAGE CHECK

PASSENGER RECEIPT

XXX

RATLIFFE/GINA

NOT VALID FOR

TRANSPORTATION

THIS IS YOUR RECEIPT

FP

LAX299.09 AA X/CHI AA WAS299.09WFSDCA 598.18 END X

FDCA3ORD3LAX3ORD3

PAID

#976 6/1/95

USD 598.18

US 59.82

XF 12.00

USD 670.00

05030544444

0 001 2156725769 6

AmericanAirlines

XXXXX

BOARDING PASS

TLIFFE/GINA

CADRDAA1467W 05MAY

ROLAXAA615 W 05MAY

AXDRDAA1734W 08MAY

RODCAAA578 W 09MAY

NOT VALID FOR TRAVEL

001 2156725769 6

001/44J

976

AUTOMATED INTELLIGENT SYSTEMS, INC.
2771 PLAZA DEL AMO, STE. 809 1-800-999-1736
TORRANCE, CA 90503

JUNE 01 1995

PAY TO THE ORDER OF Robert Ratliffe $1,709.00

ONE THOUSAND SEVEN HUNDRED NINE ONLY DOLLARS

Sumitomo Bank of California
TORRANCE OFFICE

FOR Reimburse Air Ticket

JC03817

EXHIBIT

GR II

March 21, 1995

Mr. Johnny Chung
Chairman/CEO,AISI
2771 Plaza Del Amo
Suite 809
Torrance, CA 90503

Dear Johnny,

The more I reflect upon our last conversation, the more excited I am for the future. I feel very fortunate to have found someone who believes in the President as much as I do and is willing to work towards his success.

I am equally optimistic about the China adventure. I have heard many wonderful things about the country and Her people, but have not had the opportunity to see the places or experience the people and customs until now.

I am also looking forward to accommodating your guests and planning the "courtesy visits". We will have to discuss this in more detail so I will know exactly what you expect. I am a people person who genuinely enjoys seeing others happy. I am thrilled to be able to turn this into a lifestyle, so as to provide you and your guests with a Washington experience they will remember.

I truly appreciate the opportunity that you have given me and look forward to discussing more of the details later this week.

Sincerely,

Gina Ratliffe

Gina Ratliffe

EXHIBIT
GR 12

March 26, 1995

Ms. Maggie Williams
The White House
Office of the First Lady
Washington, D.C. 20036

Dear Maggie,

I would like to discuss a professional matter with you. As I have mentioned before, I am planning a trip to China. A group of 10 Americans, including Don Fowler and three Congressional members, will be going to China to meet with numerous officials and businessmen. Since the Chinese-American business leaders in the United States are so important for the '96 election, I am building a bridge so these community leaders will participate. This trip is also very important for the cultural and trade relationship between China and the U.S., so it is necessary that it run smoothly.

Maggie, you know how much I like you and enjoy working with your gracious staff. They are always most helpful to me when I bring my groups to the White House. With your permission, I would like to recruit a member of your team. I need a competent individual to coordinate, plan, and schedule the trip to China, then after the trip, I will need a person to work with the Asian groups that come to Washington.

When visiting your office, the efforts of Gina Ratliffe have stood out. I was impressed with Gina's professional manner and work ethic and would like to put her in charge of my Washington office. Her responsibilities will be geared to what I call "courtesy visits" for the groups of people coming over to America; consequently, she will not be dealing with the machine aspect of the business.

I understand that her internship is not officially over until the end of April; however, I have another group coming into the country April 5th and would like very much to have her begin work for AISI at this time.

Gina is very committed to supporting the President and the First Lady. I assured her that we are all working for the same purpose--our goal is to see President Clinton re-elected. Maggie, you know that you are my good friend. I greatly admire and appreciate your service to this country, but even more I respect you as an individual. I believe that the quality of people in your office reflect the type of person that you are. With your approval I would like Gina to continue to work and support this Administration, only with a slight change--that she switch over from your payroll to mine!

Maggie, if you like I am happy to talk to you about this. You can call me at 1 (800) 999-1736 and I will answer any questions you might have. I appreciate your consideration and look forward to continued, friendly, working relations between our offices.

Your friend always,

Johnny Chung

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 11:24 am
SENDER: Suettinger, Robert L.
SUBJECT: Subject: RE: PHOTOS? [UNCLASSIFIED]
TO: Darby, Melanie B.

CC: Roth, Stanley O.

The joys of balancing foreign policy considerations against domestic politics. . . I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the DNC, who am I to complain? Neither do I see any unalloyed benefit, either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide (present or former) Chinese officials, with the possible exception of James Y. Sun, "young entrepreneur and self-made millionaire." Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

But a caution -- a warning of future déjà vu. Having recently counselled a young intern from the First Lady's office who had been offered a "dream job" by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler, and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials. My concern is that he will continue to make efforts to bring his "friends" into contact with the POTUS and FLOTUS -- to show one and all he is a big shot, thereby enhancing his business. I'd venture a guess that not all his business ventures -- or those of his clients -- would be ones the President would support. I also predict that he will become a royal pain, because he will expect to get similar treatment for future visits. He will be persistent.

Bob

From: Darby, M. Brooke
To: @ASIA - Asian Affairs
CC: /R, Record at A1
Subject: PHOTOS? [UNCLASSIFIED]
Date: Friday, April 07, 1995 01:12 PM

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):

EOP 005439

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 11:24 am
SENDER: Suettinger, Robert L.
SUBJECT: Subject: RE: PHOTOS? [UNCLASSIFIED]
TO: Darby, Melanie B.

CC: Roth, Stanley O.

The joys of balancing foreign policy considerations against domestic politics: I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the DNC, who am I to complain? Neither do I see any unalloyed benefit, either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide (present or former) Chinese officials, with the possible exception of James Y. Sun, "young entrepreneur and self-made millionaire." Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

But a caution -- a warning of future déjà vu. Having recently counselled a young intern from the First Lady's office who had been offered a "dream job" by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler, and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials. My concern is that he will continue to make efforts to bring his "friends" into contact with the POTUS and FLOTUS -- to show one and all he is a big shot, thereby enhancing his business. I'd venture a guess that not all his business ventures -- or those of his clients -- would be ones the President would support. I also predict that he will become a royal pain, because he will expect to get similar treatment for future visits. He will be persistent.

Bob

From: Darby, M. Brooke
To: @ASIA - Asian Affairs
CC: /R, Record at A1
Subject: PHOTOS? [UNCLASSIFIED]
Date: Friday, April 07, 1995 01:12 PM

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):

EXHIBIT
GR 15

Attn: Ms. Gina Ratliffe 5-11-1995

Fm: Tina

Everbright Bank & Everbright Group
U.S. Visit Schedule
光大銀行、光大集團訪美行程安排

6/26	Monday		6月26日	星期一
	———	Pick up at Washington D.C. airport		機場迎接
	———	Check In to J.W. Marriott Hotel		安排住入賓館
	7:00 p.m.	Dinner		晚宴
6/27	Tuesday		6月27日	星期二
	8:00 a.m.	Breakfast in the Hotel		賓館早餐
	10:00 a.m.	Department of Treasury		訪問財政部
	12:00 p.m.	Lunch at White House Mess		白宮午宴
	1:30 p.m.	Tour the White House		參觀白宮
	2:00 p.m.	Free Time		自由活動
	7:00 p.m.	Dinner		晚宴
6/28	Wednesday		6月28日	星期三
	8:00 a.m.	Breakfast in the Hotel		賓館早餐
	10:30 a.m.	Meeting DNC Chair Mr. Don Fowler		拜訪民主黨黨主席 福勒先生
	12:00 p.m.	Lunch at DNC Headquarter		午宴於民主黨黨部
	1:30 p.m.	Return to Hotel		返回賓館休息
	6:00 p.m.	The White House Dinner Party (Formal attire male- black tuxedo female-evening dress)		白宮官方晚宴 （男士：黑色禮服及領結 女士：晚禮服）

EXHIBIT
GR16

McCLAIN, WILSON, DEWEY & MOUNTS
REAL ESTATE

Greystone Manor
2325 Porter Street

3 Million Dollars

First Floor

* Large Entrance Hall with broad sweeping staircase (10 ft. ceilings), beautiful plaster mouldings
* Main Drawing Room with marble fireplace, plaster mouldings
* Two Sun Porches with elaborate mosaic tiles, one on each side, terra cotta tile patio at rear of house
* Formal Dining Room with marble fireplace
* Library
* Marble Powder Room
* New large Kitchen, maple cabinets, ceramic tile floors, back stair case, deck off kitchen

Second Floor

* Three bedrooms, all with fireplaces and baths ensuite; a fourth bedroom: large windows with beautiful views, ample closet space (Master bedroom walk-in closet), washer and dryer.

Third Floor

* New staff quarters; In-law suite with new kitchen, separate dining room, two bedrooms and two baths
* Guest bedroom and bath

Lower Level

* Enormous unfinished rooms with two separate entrances

* Private Grounds: 4.2 acres of private grounds bordered on three sides by National Park land. Two car stone garage and stone pergola

Particulars

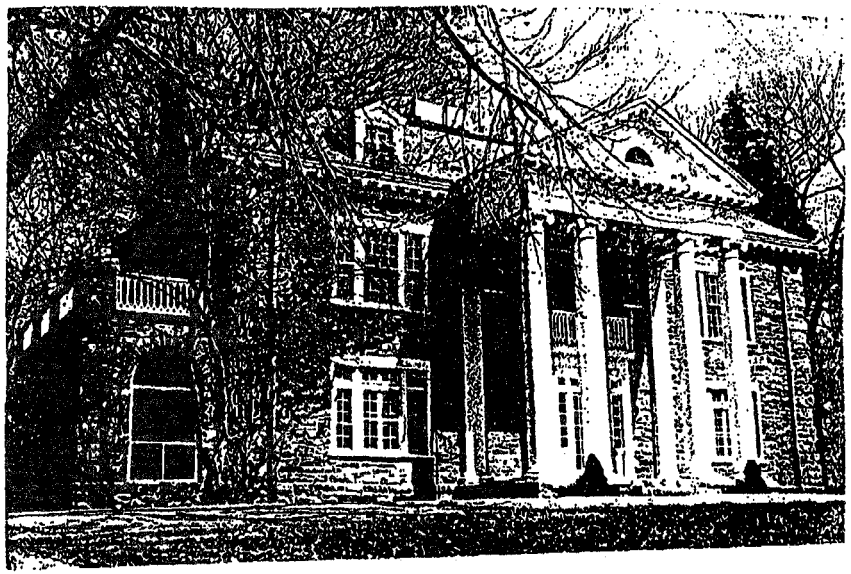
Year Built: 1911 Lot: 3 & 4 Square 2224
Taxes: $ 20,163 3 New Zones CAC
New Roof New Wiring (600 AMPS) New Plumbing

For further information on this fine property, please contact Steven McClain at (202) 332-3131 or at home at (202) 362-9274.

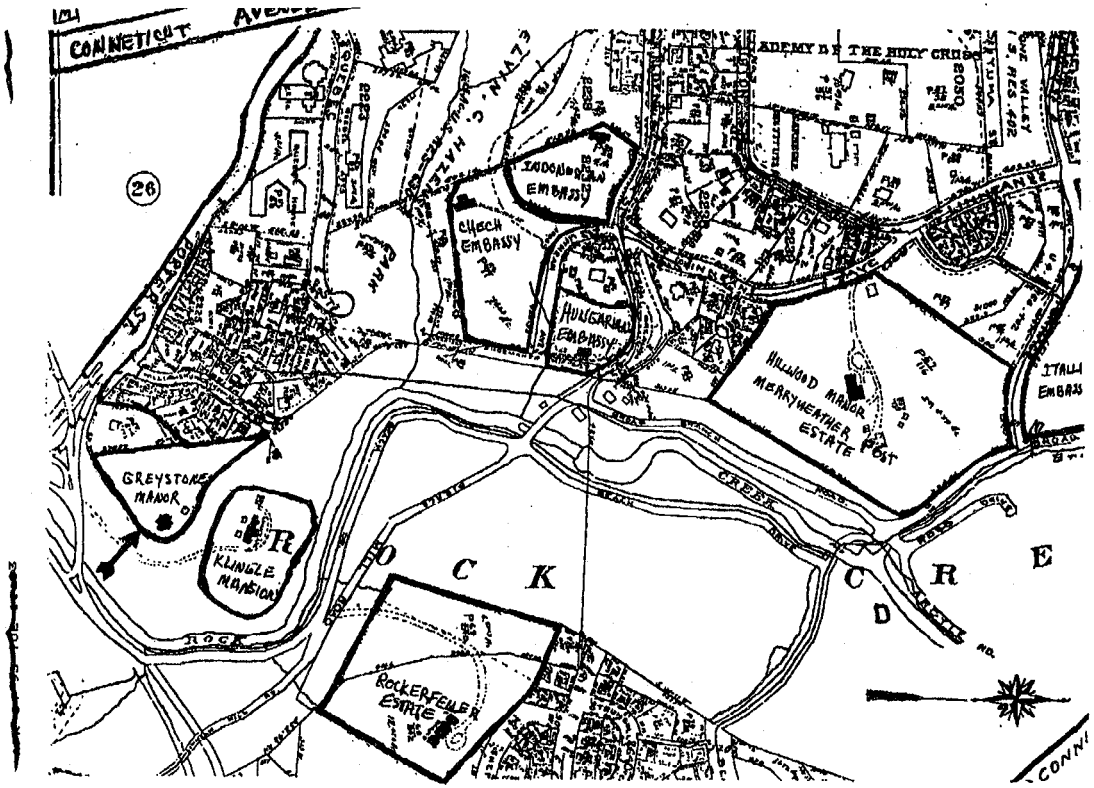
(All information deemed reliable but not warranted or guaranteed by broker or his representatives.)

Post Office Box 53080 · Washington, D.C. 20009 · (202) 332-3131

EXHIBIT
GR17



Greystone Manor
2325 Porter Street, N.W.


CONNECTICUT
26
CZECH EMBASSY
HUNGARIAN EMBASSY
HILLWOOD MANOR
MERRYWEATHER POST
ESTATE
GREYSTONE MANOR
KLINGLE MANSION
ROCKEFELLER ESTATE
ROCK
CREEK

LEASE APARTMENT - D.C.
(All Rights Reserved)

WASHINGTON LAW REPORTER FOR
1625 Eye St., N.W., Washington, D.C. 20

THIS LEASE, made this 30th day of MAY, 1995, by and between HAMILTON MANAGEMENT COMPANY herein called "Landlord," and GINA RATLIFFE herein called "Tenant":

WITNESSETH, that Landlord hereby rents to Tenant the premises known and designated as Apartment No. 7, located on the floor, in Washington, D.C., for a term of 1 year, commencing on the 1 day of JUNE, 1995, and ending on the 31st day of MAY, 1996, at and for the term rent of $; payable in monthly installments of $, in advance on the 1ST day of each and every month during the term of this lease, at the place designated by Landlord, wherever located. Tenant is taking possession of said premises on JUNE 1ST 1995, and thereafter the monthly installment of rent will be due and payable on the 1ST day of each month, commencing on JUNE 1, 1995, as hereinabove provided.

IT IS AGREED:

1. That the Tenant takes possession of said premises as a tenant for the aforesaid term, subject to delivery of possession by the Landlord and covenants and agrees that the statements and representations made on the signed application made by the Tenant are material representations relied upon by the Landlord and are incorporated into this agreement by reference, the falsity of which, in whole or in part, shall constitute a breach of this lease entitling the Landlord to possession of said premises, at his option, without notice, notice to quit being expressly waived by the Tenant. This lease is conditioned upon the Landlord being able to secure possession of said premises from the existing tenant, if any, by the commencement date hereof, and if the Landlord is unable to deliver possession of said premises to Tenant at said commencement date for any reason, such right of possession by Tenant shall be postponed until such time when said premises shall be put in suitable physical condition for occupancy, or until such time when the Landlord is able legally to deliver possession, without any liability on the part of the Landlord to the Tenant for any such postponement.

2. That the Tenant will deposit with the Landlord on or before commencement of the tenancy the sum of $ to be held by the Landlord as a Security Deposit, and which, at the termination of the tenancy, for whatever cause, Landlord may retain and apply as required, as full or partial payment for any damage to the demised premises damage by fire or other casualties not occurring through the negligence of the Tenant, his family, agents or employees, or for past due unpaid rent; the portion of said Security Deposit not so retained and applied shall be refunded to the Tenant within days after Tenant has quit possession of the premises. In the event that this lease shall be terminated by the Tenant prior to the expiration date, all or part of the Security Deposit aforesaid may be retained by the Landlord as damages for the loss of rent resulting from such premature termination and without prejudice to the Landlord's rights regarding any other further obligations of the Tenant; the portion of said Security Deposit not so retained and applied shall be refunded to the Tenant within 45 days after Tenant has quit possession of the premises.

3. That all personal property in said premises shall be and remain at the sole risk of Tenant, and Landlord shall not be liable for any damage to, or loss of such property arising from any acts of negligence of any other persons or from any other cause whatsoever, nor shall Landlord be liable for any injury to the Tenant or other persons in or about the premises, except when caused by the negligence of Landlord or his agents or employees.

4. That if the premises become uninhabitable by reason of fire not due to the negligence of Tenant, his family, agents or employees, the rent herein provided for shall be suspended until the premises shall have been restored to a habitable condition. Landlord shall not be obliged to rebuild or restore said premises.

5. That this lease is, and shall remain, subordinate in lien to all existing mortgages or deeds of trust upon said premises, and to any and all mortgages and deeds of trust that may hereafter be placed thereon.

6. That upon violation by Tenant of any of the provisions and agreements herein contained, or failure of Tenant to pay the rent when due and payable, at the option of Landlord this lease and all things herein contained shall forthwith cease and determine and shall operate as a notice to quit, any notice to quit as required by law, in each event being hereby expressly waived, and Landlord may thereupon proceed to recover possession of said premises in accordance with the provisions of the law regulating proceedings in cases between landlords and tenants.

7. That in the event Tenant shall remain in possession of the premises hereby demised at the expiration of the term hereby created, Tenant shall, by virtue of this agreement, become a tenant by the month at the same monthly rental as hereinabove provided as the monthly installment, to be paid as aforesaid, and the Tenant shall be subject to all of the agreements and conditions herein contained. Thirty days notice in writing from the tenant to the landlord is required prior to tenant's departure.

8. That no waiver of one breach of any covenant or agreement herein contained shall be construed to be a waiver of the covenant or agreement itself, or of the subsequent breach thereof.

TENANT HEREBY FURTHER AGREES: To use said premises as a dwelling and for no other purpose, to pay the rent herein reserved when the same is due, without demand, and without any deduction therefrom, whether by attempt to credit or apply in lieu of such rent payment all or any part of the Security Deposit, or otherwise; (to pay all utility bills for said premises when and as the same shall become due and payable;) to

keep the premises clean and sanitary as the condition of the premises permit; to dispose from the premises all rubbish, garbage and other organic or flammable waste in a clean, safe and sanitary manner; to properly use and operate all electrical, gas, plumbing and heating fixtures and appliances, and in the event the plumbing of said premises is obstructed due to the negligence of the Tenant, his family, guests, agents or employees to pay the cost of clearing such obstruction immediately upon presentation of the bill to Tenant by Landlord; not to permit any person with his permission to willfully or wantonly destroy, deface, damage, impair or remove any part of the structure or dwelling unit or the facilities or appurtenances thereto, and not himself do any such things; to acknowledge and recognize as Landlord any assignee or transferee of this lease; not to assign or sublet said premises or any part thereof, nor transfer possession or occupancy thereof to any other person or persons; not to remodel or make any structural changes, or alterations, additions or decorations of any nature; not to install, erect or attach any fixtures, appliances or attachments to the premises, nor to remove, exchange or replace fixtures or equipment of any nature in said premises without the Landlord's written permission first obtained; to use said premises is such manner so as to comply with all Municipal Orders and Regulations; not to use the said premises or permit the same to be used for any disorderly or unlawful purpose, or in any manner offensive to any other occupant of the building; not to keep or allow to be kept any gasoline or other explosi[redacted]t, bird or othe[redacted]al on said premises; not to permit more than [redacted] persons, including children, to use and occupy said pre[redacted]es as a dwelling; that the Landlord, its agents or employees shall and may, at all reasonable hours, without notice to Tenant, enter in and upon said premises for the purpose of making repairs to protect the property from damage and for all other proper purposes; that at the expiration of the term hereof, Tenant agrees to surrender said premises in the same condition as when received, , damage by fire or other casualty not occurring through the negligence of Tenant, his family, agents or employees excepted; that in the event Tenant is adjudicated a bankrupt or makes an assignment [redacted] benefit of creditors, this lease, at the o[redacted] Landlord, shall forthwith cease and determine, an[redacted] premises shall be surrendered to the Lan[redacted] reserves the right to forthwith re-enter and [redacted] said premises.

The security deposit is never to be used for the last month's rent.
After 1st twelve months tenant will receive 5% interest on security deposit. No interest is paid for less than twelve months.
Rent is subject to $25. charge if received after the first of the month or check is dishonored.
No tape or nails are to be used on the walls. Vacated apartments not cleaned and returned as leased are subject to cleaning and decorating charges. Landlord will notify tenant of deficiencies within 45 days of departure. Checks are to be mailed to arrive 1st of month to:

Hamilton Management Co.
3016 Dumbarton Street, N. W. #2
Washington, D.C. 20007

[redacted]

EXHIBIT
GR18

WITNESS, the hands and seals of the parties hereto on the day and year first above written.

Witness:

DAVID TON By J. O. Hedden (SEAL)
Landlord

Nina Ratliffe (SEAL)
Tenant

(SEAL)
Tenant

This is to certify and acknowledge that I received a copy of my rental application, an executed copy of this lease and a copy of Article 290 of the Housing Regulations of the District of Columbia this 1 day of June, 1975

Nina Ratliffe
Tenant

May 24, 1995

Johnny,

Here is the information about the checking account I just opened:

Crestar (is the name of the bank)
1700 K Street, NW
Washington, D.C. 20006-3801
(202) 879-6469 phone
(202) 293-3291 fax

The Account Number is:

24 Hour Personal Service, 7 Days a Week, 1-800-CRESTAR

Thank you very much. Have fun at the wedding!

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To:		From : Johnny Chung
Date :	Time :	**For Information Call : (310) 328-3883**
Fax Number :		Total Pages Including This Cover Page :

MR. JOHNNY CHUNG (鐘約翰)
Chairman/CEO

Mobile: (310) 990-6055
Home Tel: (310) 809-5305
Home Fax: (310) 924-6635

California Corporate Office:
2771 Plaza Del Amo, Suite #809
Torrance, CA 90503
Tel: (310) 328-3883
Fax: (310) 328-4196

Contact: **Ms. Irene Wu** (吳亜儀)
Corp. Communications Manager

Washington DC Office:
955 26th Street #709 N.W.
Washington, DC 20037
Tel: (202) 342-5805
Fax: (202) 965-5605

Contact: **Dr. Wen C. Lin** (林文欽)
Senior Advisor to Chairman/CEO
Tel: (301) 299-8241
Fax: (301) 299-8881

Hong Kong Office:
6D Hilton Towers
96 Granville Rd.
Tsim Sha Tsui East
Kowloon, Hong Kong
Tel: 852-2301-3800
Fax: 852-2739-1182

Contact: **Mr. George Liu** (劉益成)
Special Asst. to Chairman/CEO

Ms. Emily Chang (張遠貞)

Taiwan Office:
#63 Ren Her Road
Tainan, Taiwan, ROC
Tel: 886-6-260-7335
Fax: 886-6-260-2402

Contact: **Mr. George Liu** (劉益成)
Special Asst. to Chairman/CEO

Ms. Li-Ching Chen (陳麗卿)

China Office: - Beijing
#5 Dong San Huan Bei-Lu
Caho Yang District, 100004
Beijing, China
Tel: 86-1-501-0569, 501-0172
Fax: 86-1-501-1329

Contact: **Mr. David W. Chen** (陳肇)
Special Asst. to Chairman/CEO

Mr. Yei-Jun He (賀業軍)

China Office: - Quangzhou
#37 Ti-Yu East Road
Quangzhou, China
Tel: 020-757-2825

Contact: **Mr. Jian-Feng Sun** (孫劍峰)
Special Asst. to Chairman/CEO

China Office: - Xinjiang
#32-8 Youhao North Road
Urumqi City, 830000
Xinjiang, China
Tel: 991-484-8588, 484-3538
Fax: 991-484-5588

Contact: **Mr. Jian-Feng Sun** (孫劍峰)
Special Asst. to Chairman/CEO

EXHIBIT
GR20

649

AISI Automated Intelligent Systems Inc.

George Liu
Special Assistant to Chairman

California Office:
2771 Plaza Del Amo, Suite 809
Torrance, CA 90503 U.S.A.
Tel: (310) 328-8585
Fax: (310) 328-8881

Taiwan Office:
No. 160 Feng Long, Tai Ying Village
Hsin Shih Shiang, Tainan Hsien, Taiwan
Tel: (06) 599-4665
Fax: (06) 599-1067

BUILDING THE U.S. FAX HIGHWAY TODAY

AISI Automated Intelligent Systems Inc.

David W. Chen
Special Assistant to Chairman
陳 衛

California Office:
2771 Plaza Del Amo, Suite 809
Torrance, CA 90503 U.S.A.
Tel: (310) 328-8585
Fax: (310) 328-8881

China Office:
618 Beijing Fortune Building
No. 5 Dong San Huan Bei-Lu
Chao Yang District, Beijing, China 100004
Tel: (01) 501-0569 Fax: (01) 501-1329

BUILDING THE U.S. FAX HIGHWAY TODAY

EXHIBIT
GR21
PENGAD-Bayonne, N. J.

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

June 5, 1995

Ms. Gina Ratliffe
3016 Dumbarton St., N.W. Apt #7
Washington, D.C. 20007

Dear Gina,

Enclosed is your pay check for the month of May 1995 and my personal check as we have discussed to assist you with your move.

As you are aware of, there is usually a three-month probation period for all new hire employees. I would like to request from you at this time a proposal on what you can contribute and how you can assist AISI in Washington D.C. After all, that was the major reason for your employment with us.

I am very sorry to say that your performance lately have not been satisfactory to our agreement. I do expect to see some kind of improvement and enthusiasm from you in the next thirty days for I do know that you have a lot more to offer. Under careful reconsideration, your China trip is temporarily postponed. I also wanted to inform you that the China Delegation which was scheduled to arrive in D.C. at the end of June has cancelled their trip. I will advise you of any further plans.

Sincerely,

Johnny Chung
Chairman/CEO

EXHIBIT
GR 22

JOHNNY C. CHUNG
18401 NORWALK BLVD. 310-809-5305
ARTESIA, CA 90701

No. 107

6-5-95

16-3784/1220

Pay to the order of GINA RATLIFFE $ 2000.00

Two thousand and 00/100 DOLLARS

General Bank
CERRITOS OFFICE
18443 S. PIONEER BLVD. • ARTESIA, CA 90701

Memo Help GINA To MOVE

JC04068

EXHIBIT
GR 23

RATG01 GINA D. RATLIFFE 05/01/95 05/31/95 940145

977

AUTOMATED INTELLIGENT SYSTEMS, INC.
2771 PLAZA DEL AMO, STE. 809 1-800-999-1736
TORRANCE, CA 90503

JUNE 01 1995 16-339/1220

PAY TO THE ORDER OF GINA D. RATLIFFE $1,955.64

ONE THOUSAND NINE HUNDRED FIFTY-FIVE and 64/00 DOLLARS

Sumitomo Bank of California
TORRANCE OFFICE
21101 MAIN THORNE BLVD., TORRANCE, CALIFORNIA 90503

FOR S. of May 1995

31000.000 2583.33 627.69 1955.64 2583.33 627.69 1955.64

A.I.S.I. 940145
2771 PLAZA DEL AMO, #809

TORRANCE, CA 90503

**** ONE THOUSAND NINE HUNDRED FIFTY FIVE & 64 /100 DOLLARS

06/01/95 ****$1,955.64

GINA D. RATLIFFE

RATG01 GINA D. RATLIFFE 05/01/95 05/31/95 940145

SALARY	2583.33	2583.33	SS	160.17	160.17
OVERTIME 1	0.00	0.00	MCARE	37.46	37.46
OVERTIME 2	0.00	0.00	FEDERAL WH.	430.06	430.06
SICK HOURS	3.33	3.33			
VACATION HOURS	6.67	6.67			

JC03818

EXHIBIT
GR24
PWCSD-Reporters, N.J.

July 11, 1995

Mr. Johnny Chung
955 26th Street, N.W.
#709
Washington, D.C. 20037

Dear Johnny:

Though our Saturday conversation may seem like a set-back, I am positive we can use the momentum to spring forward and move on into the future. My pledge of support that I gave you for your peace mission continues to stand. I believe that God has given you a beautiful gift that is mixed with unparalleled responsibility. The history that you are making is very significant. Novels will be written, perhaps a Peace Prize won; and, probably a World Peace Award Organization will exist because of your efforts and teamwork with this country, other nations, and God. I believe you could be the bridge to connect all three.

On Saturday you suggested I was at a cross roads, and you gave me an opportunity to think about if I wanted to help be a messenger of peace or work with America's young people and politics. The conclusion that I came to is that the two are not necessarily mutually exclusive. Certainly the two can be linked. If I am working to educate young voters to be more politically aware, I can continue to spread the news and praise of the work Johnny Chung is doing in China. Though relations between the U.S. and China may be discouraging at the moment, since the rising tension continues; history has proven that God has used the energy and lively spirit of young people to influence attitude and move towards peace. A recent example I think of is how the convictions of America's youth in the '60's brought young people together to make a firm stand for peace. Their voices were heard, and consequently the world heard sounds of peace rather than war. So though I may not work for you directly, I can still work to help you achieve your goal.

You asked me Saturday to go into my heart to find the answer for my decision. I did, and I want to share with you the factors that led to my decision. When we first talked about my job responsibilities, you said you needed me to be in Washington and to assist you with delegations that you brought to D.C. We discussed bringing groups on various tours around the city, being aware of exclusive events, testing out restaurants so as to be familiar with eating places when groups arrive.

We also specifically discussed that you had bought a 12 room, $2.5 million mansion. I was to live in this establishment and it would be used to house guests in when they came to Washington. We even discussed that the mansion would be decorated and furnished with a Victorian style and that I would help the decorators. Originally I was told that the mansion would be ready May 15, 1995. You also said that the mansion would be supplied with a Lincoln Town Car, a Mercedes, a driver and a maid, and that I would have access to these services. When the date for the mansion to be ready to move into kept getting pushed back by months, you agreed to pay $800 per month for me to live in an apartment and gave me permission to sign a

1 year lease. You also told me to go to my bank and open up a separate checking account to which you said you were going to wire $10,000 which would be used for the AISI expense account in Washington. Also, I would be able to draw my rent from this account.

I opened it by depositing $20 of my own money on the day that you told me to and at your request I faxed you all the appropriate numbers for the bank (phone number, account number etc.). Two weeks passed and it wasn't until after repeated requests that I received the first month's rent and the security deposit. My check, after this period of time, had bounced, thus I was charged a fee of $25.00 plus I lost my original deposit. Since then, the bank has had to close the account and I now have bad credit with CRESTAR bank. I was greatly embarrassed when the bank called me at the White House.

Also according to our original agreement, you told me that on top of my salary I would be paid $500 per month for a clothing allowance. I have the receipts for my purchases form April through July. Before we left for China you told me to purchase luggage. I did and I have the $500 receipt. Also following your directions to look into good Washington restaurants and to try them out, I went to Morton's of Chicago and have the receipt for $126. Recently my landlord left me a notice that I have been charged a $20 late rent fee for July plus I now have bad standing within my living environment.

Reflecting on the unfulfilled promises: the Spielberg party, the mansion, cars, driver, maid, rent, equipment for research project, a budget for the project, clothing allowance, etc. I feel it would be best at this time for us to close this chapter of the book and move on to new beginnings. I would like to take this opportunity to give my 2 week notice. I request that I be reimbursed for the financial arrangements that I have been instructed to make: clothing allowance for four months, luggage, restaurant bill and unpaid rent to June 1, 1996. I am also requesting the payment for the bounced check, late rent fee, and original deposit.

I have been completely devoted to this job since I began work. I gave up my college graduation ceremony, many weekends and evenings to show my dedication. I have also been extremely patient regarding delayed deadlines and an inconsistent cash flow of money I was told to spend and would then be reimbursed for. However, since the job description has changed drastically from what I originally agreed to, I am also requesting my July salary plus two months of severance pay so that I may begin my job search.

Johnny, I believe that we are both so very fortunate that God has blessed us by giving us each missions to fulfill for Him during our time here. As I mentioned before, our paths may be separate, but connected--somewhere down the road they will meet. I continue to have the utmost respect and admiration for the huge goal that you are working to accomplish. I believe your mission is good and trust that your word is too. I don't think that you meant to have one of your employees suffer from financial debt, or destroy her integrity in the community. I know how hard you are working and how incredibly busy you are, I just ask that you now take a moment to fulfill your promises and your word.

I wish you, your company and your mission success and a solid future. I look forward to watch God's almighty plan unfold and to see where he will cross our paths once again.

Sincerely,

Gina Ratliffe

July 17, 1995

Dear Johnny,

I am glad we had the chance to talk last week. I appreciate and value our discussion about starting a new chapter. I am sorry about the way our conversation went latter that evening, and after rethinking everything, I feel our agreement is fair and equitable.

I also want you to know that I meant all that I said in the original letter about my support and admiration for what you are trying to accomplish. And I will continue to work in my own way to help you achieve your goals. I trust that we will both use this opportunity as a new beginning.

I will contact you at the office latter today to confirm that you received this fax, and look forward to speaking with you.

Sincerely,

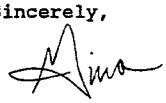
Nina

July 18, 1995

Dear Johnny,

As we discussed yesterday, I am faxing you our agreement in writing. I would appreciate your sending me today two (2) months salary and the $4000 you said that would come from your personal account. I have learned a great deal from working for you and I thank you for the opportunities. I hope your next trip to China is safe and successful and look forward to hearing about it when you return. Thank you again.

Sincerely,



AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel. (310) 328-8585 • Fax: (310) 328-8881

July 20, 1995

Ms. Ratliffe

Re: AISI Employment Status

Dear Gina:

Thank you for your recent faxes. I am pleased that we have been able to resolve the matters between ourselves amicably, although I sincerely regret that your relationship with AISI did not meet our respective expectations.

I enclose the two checks in the amounts to which we agreed. While I did not find it necessary, my attorney insists that we formally document our agreement, and therefore, I have enclosed a copy of that document as well. I trust this meets with your satisfaction.

I wish you the best in the future, and invite you to call me if I can assist you in any way in your future endeavors.

Very truly yours,

AUTOMATED INTELLIGENT SYSTEMS, INC.

By: JOHNNY CHUNG
CHAIRMAN/CEO

EXHIBIT
GR28

THIS IS A COMPLETE RELEASE

READ IT BEFORE SIGNING!

RELEASE IN FULL OF ALL CLAIMS AND RIGHTS

The undersigned, in consideration of the sum of Four Thousand and No/100 Dollars ($4,000.00) plus two months severance pay, receipt of which is hereby acknowledged, does for herself, her predecessors, successors and assigns, and anyone claiming by or through or under her:

Release, acquit and forever discharge AUTOMATED INTELLIGENT SYSTEMS, INC. ["AISI"] and JOHNNY CHUNG [collectively "Released Parties"] and their predecessors, successors, assigns, sureties, attorneys, attorneys-in-fact, agents, employees, heirs, executors, administrators, present and future officers and directors, affiliates, subsidiaries and related companies, and each of them, from and for any claims, rights, causes of action, damages, judgments, executions, attachments, debts and demands of every kind and nature, arising out of or by reason of any act or omission of said Released Parties, relating in any way to, or arising out of, the undersigned's employment with AISI and including, but not limited to, any claim for breach of contract, breach of the implied covenant of good faith and fair dealing, wrongful termination or fraud against which the Released Parties herein, the undersigned, ever had or now may or will have by reason, of her employment with AISI, including her hiring and termination.

The undersigned hereby declares and represents that the undersigned understands and agrees that resolution is made in the spirit of compromise and that the above-cited consideration is not to be construed as an admission of liability on the part of any person released hereby, and such liability is expressly denied.

The undersigned hereby agrees to and intends to release all claims that the undersigned may have against the party released, whether or not the undersigned knows or suspects the same to exist in his favor, and, in this connection the undersigned expressly waives the provisions of Section 1542 of the California *Civil Code* which reads as follows:

> A general release does not extend to claims which the creditor does not know or suspect to exist in his favor at the time of executing the release, which, if known by him, must have materially affected his settlement with the debtor.

The undersigned agrees that this Release shall be construed in accordance with, and governed by, the laws of the State of California.

The undersigned further states that the undersigned has read the foregoing release and knows the contents thereof and that the undersigned has signed the release of her own free act and deed.

CAUTION! READ BEFORE SIGNING BELOW

Signed this _____ day of _____, 1995, at _____, _____.

_____
GINA RATLIFFE

Forward this asap to Thank S

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To: Betty Currie	From: IRENE for Johnny Chung
Date: 7-25-95 Time:	For Information Call: (310) 328-3883
Fax Number:	Total Pages Including This Cover Page: 3

Please have President Clinton write me a credential letter for my trip to China. I have enclosed a letter dated Oct. 3, 1994 which I can not use for this trip because its for Taiwan.

Thank you very much for your help!

PLEASE STAFF

Building The U.S. Fax Highway Today

2771 Plaza Del Amo Suite 809, Torrance CA 90503

EXHIBIT
GR29

EOP 005053

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny,

It was good seeing you again last week. I want to thank you for the essential role you play in bridging our diverse communities and your help with my Administrtion. Your efforts in helping to open communications between China and the United States are much appreciated.

Congratulations on a job well done.

Sincerely,

EOP 005054

BILL CLINTON

October 3, 1994

Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo
Suite 809
Torrance, California 90503

Dear Johnny:

Please let me extend my appreciation to you for your participation in my birthday celebration with your family on August 2nd. Your outstanding support and dedication to this Administration is benefiting Americans across the nation.

I also want to express to you how essential your role has been in helping to bridge our country' diverse communities. Your efforts to open lines of communication between our Administration and the Taiwanese American community are much appreciated.

Again, thank you for your support and for a job well done.

Sincerely,

Bill

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To: Betty Currie	From: Johnny Chung
Date: 7-5-95 Time:	For Information Call: (310) 328-3883
Fax Number:	Total Pages Including This Cover Page: 2

Reference letter from DNC. Thank You.

Building The U.S. Fax Highway Today

2771 Plaza Del Amo Suite 809, Torrance CA 90503

EOP 005056

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EXHIBIT
GR30

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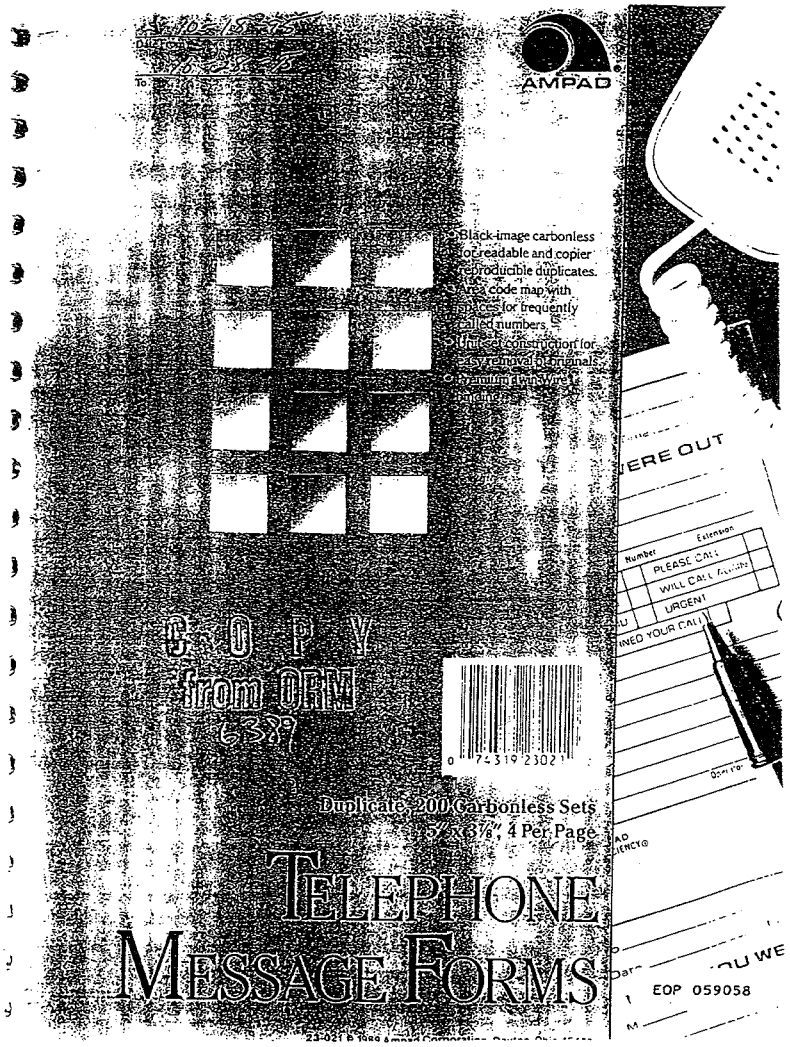
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Number
Extension
PLEASE CALL
WILL CALL AGAIN
URGENT
EOP 059058

To Evan

Date 10/26/95 Time 12:30

WHILE YOU WERE OUT

M Johnny Chung

of 202-342-5865

Phone

Area Code	Number	Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message

Landon phones to

Zuri + Maggie.

EB.

Operator

AMPAD EFFICIENCY. 23-021 - 200 SETS 23-421 - 400 SETS CARBONLESS

EOP 059059

To Evan

Date 9/27/95 Time 1:40

WHILE YOU WERE OUT

M. Johnny Chang

of

Phone 1-800-997-1736

Area Code Number Extension

TELEPHONED		PLEASE CALL	
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message He is sending 2 Baskets of flowers — 1 — for Maggie 1 — for Zhd.

EB

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. D
General C

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny:

Thank you for stopping by my office; I really enjoyed meeting your guests. You are to be commended for your efforts to build a bridge between the people of China and the United States. I want to express my appreciation to you for being a friend and a great supporter of the DNC.

Good luck on your trip to China and please keep me informed. Thank you.

Sincerely,

Donald L. Fowler

DLF/aed

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
				14 10:30 China Petro 12:00 Dinoyuthi Lunch 5:00 Vice Premier Lee 8:00 Porush & Van Dunn	15 12:00 China Petro Lunch 3:00 Mr. Chen 7:00 Qian Lou Dinner 10:00 He: Kazack	16 9:00 Dept of State/Brent 10:30 4:00 Chairman Zhang/Wine 8:00 Sun
17 9:30 China Foreign 12:00 Lunch 午餐 3:00 Entertainment 7:00 Dinner	18 9:30 Office Space Restaurant Chinese 11:00 3:00 Private Embassy 5:40 6:00 Dinner Chan Elliot	19 4:30 Dinner at Ripley's Compass	20 9:00 Chang Book & Trust 12:00 Lunch - 中信	21	22	23
24	25	26	27	28	29	30

EXHIBIT
GR 31

· 黄青春
· 中国工商银行
· 中国银行
· 新华社 · 外贸部

· 王仁中 上海
· 曲格平
· Gong Hanxin
· 日本文艺家协

· 建设部
· 李瑞环
· 盛华仁

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GR32

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NGA

BILL CLINTON

October 3, 1994

Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc
2771 Plaza Del Amo
Suite 809
Torrance, California 90503

Dear Johnny:

Please let me extend my appreciation to you for your participation in my birthday celebration with your family on August 2nd. Your outstanding support and dedication to this Administration is benefiting Americans across the nation.

I also want to express to you how essential your role has been in helping to bridge our country' diverse communities. Your efforts to open lines of communication between our Administration and the Taiwanese American community are much appreciated.

Again, thank you for your support and for a job well done.

Sincerely,

Bill

Al Gore

October 13, 1994

Mr. Johnny Chung
Automated Intelligent Systems
2771 Plaza Del Amo
Suite 809
Torrance, California 90503

Dear Johnny:

I want to take a moment to let you know how much I appreciate your support for the Democratic National Committee's Business Leadership Forum.

The Clinton Administration has made a powerful start, but without your help, it will be far more difficult for President Clinton to push the people's agenda through Congress. It is because of people like you that this Administration has been able to build a powerful record of achievement. The deficit is down and the job market is up. Some prefer easy rhetoric; your involvement in the democratic process shows commitment to *real* change.

Again, I appreciate your support, and I look forward to working with you in the future.

Sincerely,

Al Gore

DEMOCRATIC★NATIONAL★COMMITTEE

Donald L. Fowler
National Chair

Christopher J. Dodd
General Chair

March 14, 1995

The Honorable Zheng Hongye
Chairman, China Chamber of
International Commerce
1 Fuxingmenwai Street
Beijing 100027, China

Dear Mr. Zheng:

It was a real pleasure to have you and your group come by my office at the Democratic National Committee. I was honored to have such a distinguished delegation visiting, and delighted to have an opportunity to meet with you.

Our two countries and parties can accomplish great things together, and I look forward to continuing the dialogue we began last week. Johnny Chung is an excellent facilitator; you are lucky to have him as a friend, and the Democratic Party is lucky to have him as one of our most ardent DNC members.

I would be pleased to accept your invitation to visit your country and flattered that you have invited me. I have only been in office for a few weeks, but as soon as President Clinton feels comfortable enough with our organization here, I can make my time available. In the meantime, I hope we can stay in touch.

Thank you again for your courtesy in stopping by.

With all best wishes.

Sincerely,

Don

Donald L. Fowler

Democratic Party Headquarters • 430 South Capitol Street, S.E. • Washington, D.C. 20003 • 202.863.8000 • FAX: 202.863.8174
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AISI

EXHIBIT
GR34

全自動智慧系統公司的資訊科技是本公司鍾董事長以八年半的時間發展出來的一項走在資訊高速公路尖端科技的服務系統.本系統可將各項訊息藉著傳真機及各大電話公司已鋪設完成之電話網路送達到數以萬計分布不同地點的收訊人.本公司的資訊科技最大優點分述如下:

1. 省錢, 省力, 省時, 最合乎經濟效益.

2. 迅速, 準時. 確保在同一時間內不同的收訊人收到同一資訊.

3. 一切自動化, 從設定帳户到日常作業而後收帳完成.

4. 不受景氣影響, 政府在經濟不佳時更須傳訊息鼓勵大眾.

5. 日常作業間與各級政府及民主, 共和兩黨每日接觸已建立起深厚良好關係.

由於具備上述特點, 使本公司在短短三年之廣泛受到美國各界讚賞與使用.更受到克林頓統及夫人接見與來信鼓勵.目前全美已有四十州州政府與本公司簽約有業務上往來.本公在過去東西兩岸天然災難的訊息傳遞中發大的效用協助於各州政府間, 同時亦贏得其並來函感謝.

美國的中英文報及電視台並相繼著文報導本公司,要求使用我產品者日趨增加,本公司已於今年七月成立另一部門專門負責民間企業業務,服務對象設定爲"富比士五百"商家,現今已陸續有許多行業之大機構採用本公司之技術服務.如航空公司,大學,律師協會與全國性連鎖店.

本公司已審慎評估各主客關因素,由單元到多元,由美國到國外逐步發展.第一階段之目地已達到亦是牢牢地建立信譽,取信於每一個客户.第二個階段就是利用已建立起之關係爲所在美國的中國人帶來政治及商務的實質利益.

因本公司鍾董事長於上月中蒙克林頓總統派選爲"工商領袖協會"之副主席,此殊榮將帶給本公司許多參與各種政治及商業的慶典與晚宴的機會.因此獲得本公司股東一致同意決定在美國首都(華盛頓)成立分公司.本公司敬邀各工商業之領袖來參與華府分公司之盛舉,一是希望借團結之力量來傳達全美中國人的心聲與立場.來可利用各種慶宴場合以及機會建立廣播網全世界之工商領袖互相配合,製造有利的商會.本公司與各州政府及克林頓政府之特殊關係,將有利於許多創業路途的突破與便利.

本公司的目標是建立東西兩方政治,文化與經濟的交流,不論在科技上或經濟上都能達到新的突破,把最新及最有利的資源通過本系統的網路送到全世界所有華裔的手上.

另外本公司亦計劃結合目前華人社會中最具經濟實力之中國工商界力量,加上本公司與美國各州及聯邦政府之密切關係建立起暢通之經濟及政治交流管道,以提高對美之經濟,政治影響力及獲得更大之經濟利益.

本公司鍾董事長以最虔誠之心敬邀各位先進前輩共襄盛舉.

謹　祝

商　祺!

Johnny Chung
Chairman / C.E.O.

AISI

COMPANY PROFILE

Founded in Washington, D.C. in January of 1993, Automated Intelligent Systems, Inc. provides its clients with state-of-the-art communications services. The company, originally known as Telform Inc. in 1992, was formed to develop AISI's current fax broadcast system. Recognizing the challenges of rapid technological growth, Chairman and C.E.O., Mr. Johnny Chung spent 8 years in designing and developing an advance technology that brings a new dimension to the world of faxing. Today, it is a fast growing company with its corporate office in Torrance, California and our branch offices in Washington, D.C., Hong Kong, Taiwan and China.

AISI, a unique and innovative automated communications venture with unlimited expansion capabilities, is one of the few companies that offers the public the extraordinary ability to simultaneously fax broadcast documents to thousands of locations. This technological breakthrough system is not only easy to use, but also cost effective. What was once a monumental task for staff personnel, could now be performed automatically to save the users' time, money and valuable personnel resources.

In the short 3 years time, the Government Division has served 48 state government offices and federal agencies. In May of 1994, Mr. Art Liang joined AISI as the Managing Director and shortly after that the company decided to expand its service to the private sector targeting the Fortune 500 companies. AISI has already recruited many large corporations in the various industries, such as major airlines, computer component manufacturers, associations and universities.

Through Mr. Johnny Chung's persistence and practical understanding, AISI has contracted many State Government and Federal Agencies' services. From his numerous business trips, he has built up a very close and dependable relationship with most of the State Governors and the White House. Our network of alliances with numerous governmental entities and our unique position has prompted the startup of a Business Development Division. Many of AISI's shareholders are business leaders in Asia and America. Through the well-established relationship, the Asian American business executives would have the power and the necessary resources to extend into all aspects of the business world. In a world where national boundaries are increasingly transparent, unforeseen business enrichment and financial benefits could be created

AISI's primary objective is to strive for a fruitful return of investments for our busine partners and shareholders. At the same time, bridge the East and the West with networking offices.

BILL CLINTON

October 3, 1994

Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo
Suite 809
Torrance, California 90503

Dear Johnny:

Please let me extend my appreciation to you for your participation in my birthday celebration with your family on August 2nd. Your outstanding support and dedication to this Administration is benefiting Americans across the nation.

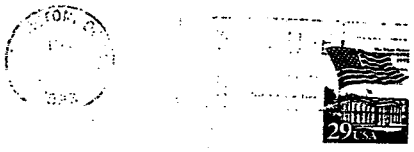
I also want to express to you how essential your role has been in helping to bridge our country' diverse communities. Your efforts to open lines of communication between our Administration and the Taiwanese American community are much appreciated.

Again, thank you for your support and for a job well done.

Sincerely,

Bill

THE WHITE HOUSE
WASHINGTON



THE WHITE HOUSE

April 26, 1993

Mr. Johnny Chung
President & CEO
Telform Inc.
100 North Barranca Avenue
Seventh Floor
West Covina, California 91791

Dear Mr. Chung:

Thank you for your letter and my apologies for not getting back to you sooner.

It appears from the correspondence you have had with federal and state officials, and with the private sector, that you are already on the right track. Nevertheless, I wish you good luck with your innovative system.

Sincerely yours,

Hillary

Hillary Rodham Clinton

Al Gore

October 13, 1994

Mr. Johnny Chung
Automated Intelligent Systems
2771 Plaza Del Amo
Suite 809
Torrance, California 90503

Dear Johnny:

I want to take a moment to let you know how much I appreciate your support for the Democratic National Committee's Business Leadership Forum.

The Clinton Administration has made a powerful start, but without your help, it will be far more difficult for President Clinton to push the people's agenda through Congress. It is because of people like you that this Administration has been able to build a powerful record of achievement. The deficit is down and the job market is up. Some prefer easy rhetoric; your involvement in the democratic process shows commitment to *real* change.

Again, I appreciate your support, and I look forward to working with you in the future.

Sincerely,

Al Gore

GOVERNOR'S OFFICE

April 6, 1994

Mr. Johnny Chung
Chairman & CEO
Automated Intelligent Systems, Inc.
2771 Plaza del Amo, Suite 809
Torrance, California 90503

Dear Mr. Chung:

It is my understanding that you have been nominated as Entrepreneur of the Year. Congratulations! It is a well-deserved recognition.

My Communications and Press offices inform me that you and your team have performed in an outstanding manner. Your good work, in turn, has enabled my office to serve the people of California effectively and efficiently -- especially during California's recent disasters.

Again, you have my appreciation for a job well done!

Sincerely,

Pete Wilson

PETE WILSON

GOVERNOR PETE WILSON • SACRAMENTO, CALIFORNIA 95814 • (916) 44f

HONORING THOSE INDIVIDUALS AND COMPANIES WHOSE INGENUITY, HARD WORK, AND INNOVATION HAVE CREATED SUCCESSFUL AND GROWING BUSINESS VENTURES

This Certificate of Nomination Is Presented To

Johnny Chung

Automated Intelligent Systems, Inc.

Daniel I. Love
Director of Entrepreneurial Services, Los Angeles
YOUNG

Ron Hagenbuch
Senior Resident Vice President
Merrill Lynch - Los Angeles
Merrill Lynch

Gregory K. Ericksen
National Director of Entrepreneurial Services
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James I. Spanfeller, Jr.
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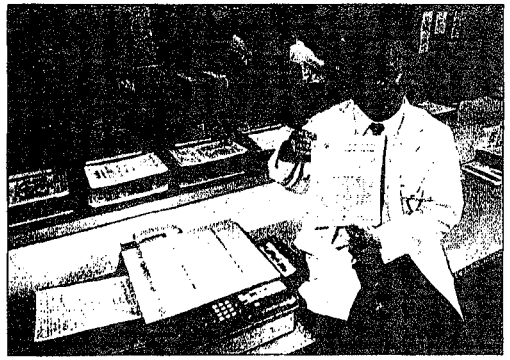

Just the fax: Chung shows off computer system for mass-faxing TODD FRANKEL/LABJ

Chung can send fax to thousands at same time – but who wants to?

BY ANNE RACKHAM
Government Editor

In the fall of 1992, Johnny Chung had about run out of ideas.

He had spent all his money, earned by and operating computer retail stores, ion – a computer information fax documents to thou- ce. He had spent months try-

ing to convince companies to sign up for the service, but no one was interested.

His wife, Kathy, finally told him to "throw out his machine and get a job." He went out into his backyard and cried.

But shortly thereafter, while watching a debate between George Bush and Bill Clinton on television, it came to him – political candidates and governments send out more

Please see Fax page 23

Major retailers, malls come slogging back from quake

Some use rebuilding as an opportunity for remodeling

BY KARA GLOVER
Staff Reporter

Nearly all the major retailers whose outlets were damaged in the Jan. 17 earthquake, both in malls and freestanding, have either already reopened or plan to reopen this year.

"I think all the majors (in the San Fernando Valley) will be back," said Richard Leyner, vice president of the Encino-based brokerage firm Zugsmith-Thind Inc.

And Matthew May, director of retail for the Westside office of Beitler Commercial Real Estate Services, said he wasn't aware of any retailers on the Westside that weren't planning to reopen.

Topanga Plaza, Promenade Mall, Sherman Oaks Galleria, Fashion Square Sherman Oaks, and Fallbrook Mall, all of which suffered at least some damage during the quake, are all at least partially open for business.

Meanwhile, Northridge Fashion Center, the mall most severely damaged by the quake, remains closed.

At Topanga Plaza in Woodland Hills, 100 out of a total of 116 stores are operating, including an earthquake-battered Nordstrom, according to a mall statement.

Nordstrom reopened Feb. 26 "right on schedule," after glass shelving was replaced, the marble flooring was repaired and the carpet was cleaned, said Nordstrom spokeswoman Caroline Brown. Replacement of the store's brick facade is expected to be completed within a few weeks.

The plaza's three other anchors – Broadway, Robinson's-May and Montgomery Ward – remain closed. A remodeled Broad-

Please see Stores page 35

FRONT LINES

Wafer

Fax: Copies go simultaneously to many publications

Continued from page 1

faxes than private companies. This could be his market. When Kathy agreed, there was no stopping him.

Chung called Clinton's mansion and offices in Arkansas non-stop, and finally he flew to Little Rock, where he said he banged on the door of the then-governor's home. He was fortunate enough to meet Hillary Rodham Clinton and hand her some information.

In April of 1993, Mrs. Clinton sent Chung a letter saying he was "on the right track." That letter from the First Lady was all Chung needed to get his foot in the door at Gov. Pete Wilson's office in Sacramento.

The governor's press people thought Chung's system would be just the thing to handle the hundreds, sometimes thousands, of press releases they send by facsimile machine every day.

A few minor adjustments later, the governor's office signed on as Chung's first client six months ago. Now Automated Intelligent Systems Inc. of Torrance has government and political clients in 39 states and is continuing to grow.

It is an American dream-come-true for the 40-year-old Chinese immigrant from Taiwan, who became a U.S. citizen six years ago.

"America really is the land of opportunity," said Chung. "You can walk into any office and show them what you've got. But you need a lot of patience.

"Once I got California and Florida (governors' offices signed up as clients), all the doors opened."

In addition to sending out faxes to oodles of recipients simultaneously, Chung's computer keeps track of all its documents by number and can retrieve them for fax recipients.

At the governor's office in California, the press deputies compile weekly lists of all their news releases by number and topic and have AISI send a list to journalists. If a reporter needs a particular news release, he can call the system, punch in a number, and the computer will fax him the requested document.

The system keeps fax recipient numbers in its memory by group – for example, Los Angeles print media, Orange County broadcast media, editorial page editors, public relations agencies or state agencies. Clients fax requests, specifying which group or groups to fax their document(s) to.

If a job request is faxed to Chung's AISI and isn't acted on by staff within two minutes, the computer beeps the chief engineer. If it still isn't acted on in five minutes, the computer beeps President and Chief Executive Chung, and everyone else is in trouble.

The computer also keeps track of everyone it sends faxes to and how many attempts it made to dial each number. If a recipient's primary number fails, the computer will dial a back-up secondary number.

Wilson's press office staff says it has been thrilled with the performance of AISI's staff and its system, especially during recent natural disasters.

Although about 85 percent of AISI's business involves news releases, Chung plans eventually to branch out into a variety of government document services. For example, he has been talking to the Centers for Disease Control in Atlanta about taking over the faxing of health-hazard updates to travel agents, communicable disease reports to health care providers, and HIV newsletters to various agencies.

"With governments cutting staff and budgets, my idea was: 'How could you do this (disseminate information) better and cheaper?' And it is cheaper. It costs them less than 50 cents per page," said Chung. "I developed it myself from scratch. That machine cost me $2 million. The machine is the one and only one."

Not to worry – Chung said he has "spare parts" at another location and could recreate the system in seven or eight days.

Born in Taiwan, Chung moved to Costa Rica at the age of 12 with his Presbyterian missionary parents. He returned to Taiwan to go to college, where he earned a degree in American literature. Then it was off to the University of California at Los Angeles.

Chung said his father, a medical doctor, wanted Chung to earn a medical degree. When Chung pursued an advanced degree in engineering, his father pulled the financial plug, and Chung dropped out of school to earn a living selling Apple computers, he said.

In 1978, Chung opened his first Iris computer retail store in Monterey Park. It quickly grew into 18 stores across the Southland. But Chung said sales started dropping off by 1985; plus he had a problem with dishonest store managers. So he decided to close down all but his first store and sink his money into his new idea.

"I was looking for a business with few employees and no inventory that was recession-proof," he said.

AISI is a privately held company with 20 shareholders (family and friends) and a board of directors. Chung said he may go public one day, but he doesn't appear to be in too much of a hurry.

Although he is not required to release financial information, Chung said the company was profitable three months after signing up its first client.

經濟新聞
點焦濟經

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用採室長州州40　功成發開人華

系統 傳送 動化 全自

穆哈倫和他所研發的全自動傳送系統。（記者王善言攝）

世界日報

FRIDAY, APRIL 1, 1994

記者王善言／專訪

經過了八年艱苦的歲月，位於托倫斯市的華人企業，自動智慧系統有限公司（Automated Intelligent Systems, Inc.）終於開動了自己的一片天空。目前全美有四十州的州長辦公室與這家公司簽約，以便享受這家公司提供的全自動傳送系統服務。這套服務將使得州長辦公室的新聞稿或重要文件，在幾分鐘內可同時傳真到數以千計不同的地點。

「世界日報在過去半年內收到的威爾森州長辦公室發出的新聞稿，都是由我們這個系統發出。」自動智慧系統公司總裁鍾約翰（John Chung）笑著對記者指出。

他補充，事實上，威爾遜州長尚且是他的第一個客戶。

鍾約翰說，「要隨開第一扇門，使得政府機構接受我們這套服務，真是不容易，但只要第一扇門打開，後面的門都開了，唯一產物，直賣系統是他與新公司目前的業務的起飛在在過去一年多內，一年多前，他還只是個沒無聞的駐西人，擁有良好的產品，但卻苦無「採購」對象。但今非昔比，一年多後，他的客戶包括威爾遜州議會議長布朗、加州民主、共和兩黨、以及其他三十九州的州長辦公室，員工亦從一人擴充到十三人。

「用我們這套系統傳真一份新聞稿出去，成本只要五毛錢，但公家機構由於人事等雜項開銷，成本要花上三至四元，因此這套系統的優點，除了可替公家省錢，又可節省人力，同時還具有省時功效。」

鍾約翰解釋，一般的傳真機固然一次最多可儲存一百個電話號碼撥出去，但由於一次只能接通一個電話，因此一百個收受單位仍是在不同的時間內收到文件，以致公家機構如果要發布一項新聞稿，必須及早撰寫好否則恐怕既誤事情。但他開發的全自動傳送系統，卻擁有二百萬電話號碼容量，在一分鐘內可「同時」將傳送出去二百萬個不同單位。且對於每份傳送出去的文件均有紀錄可查。甚至在某個接收單位的傳真機忙碌時，如果這個接收單位提供有第二個傳真號碼，則這套系統會自動接通第二個號碼，務必將文件於最短時間內傳送出去。

鍾約翰說，這套系統在北卡大地獲後發揮卓越功效，使得各新聞媒體及各階層政府救災單位，均能迅速獲得威爾遜州長辦公室發出的訊息，為此，威爾遜辦公室並親自發兩感謝他。

結合大型電腦、傳真機和先進電話系統功能的全自動傳送系統，是鍾約翰一九八六年成立自動智慧系統公司後研發出來的首席工程師林士傑共同摸索出來。鍾約翰說，當時為了招募資金，至少與五百人接觸過，被得五十餘扇門。

「如果說我今天有一點小成就，我要特別感謝東岸至四岸的一些親朋好友，尤其是我的太太振雄。」苦盡甘來的鍾約翰不無感慨的指出，當初他研發這套系統時，遭到許多人耻笑，認為他是在做夢，但他終於讓他承認行銷是最難的一環。一九八九年當他研發出這套系統後，竹與吳國財富前五百家公司接觸，結果得到回應冷漠。一九九二年秋天，他在觀賞墨球大選辯論時，才突然領悟「政府機構才是最需要這套服務的對象。」

但萬事起頭難。鍾約翰說，單單是威爾遜位於沙加緬度的總辦公室，他就開車去了十四次，其中數次，他並且陪著候選人小約翰·賽斯前往拜會候選人。

實這類事情，是在他獲得了柯林頓總統的「賞識」。事實上，喜萊莉·柯林頓與鍾約翰並無任何淵源，喜萊莉所以會致函數舞鍾約翰，可以說是一個「精誠所至，金石為開」的故事。

喜萊莉的信函為鍾約翰的行銷管道打開門檻，但如果不是鍾約翰擁有不接的精神，恐怕自動智慧系統公司也要關門大吉。而在與政府機構建立管道的過程中，鍾約翰說最令他感動的是，有關方面並沒有因為他是少數族裔企業，將他看矮一截。

來自台灣的鍾約翰，現年四十歲，十二歲時曾隨行醫的父親前往哥斯大黎加傳教，因此能說一口流利西班牙文。他曾在加大洛杉磯分校電機系肄業，在成立自動智慧系統公司前，曾擔任休斯公司電腦工程師，並曾於南加州大學攻讀工程碩士。

對於今天能再創一新局，亦感謝上神的恩典。他並且對於走上這項不需要存貨、不會遇到退票、不會受經濟不景氣影響、不需要太多人力的行業，感到滿意。

他以「有志者、事竟成」鼓勵其他有心從商的科技人才。「美國是個機會之地，你不需要有政治、家庭、財力背景，只要相信自己所做的是對的，你可以走到任何地方去推銷自己的產品，當然在過程中，你絕對需要有許多耐心。」

Mr. BURTON. Would the witnesses please take their seats. The other members of the committee are on their way back, at least some of them are. And we will start with Mr. Bennett doing his half hour of questioning. But first I would like to introduce our guests; Nancy Hernreich—is that correct?

Ms. HERNREICH. Hernreich.

Mr. BURTON. Deputy Assistant to the President for Appointments and Scheduling; Kelly Crawford, former staff assistant to Ms. Hernreich. And Carol——

Ms. KHARE. Khare.

Mr. BURTON. Carol Khare, former assistant to Don Fowler at the DNC; and Ceandra Scott——

Ms. SCOTT. Ceandra.

Mr. BURTON. Ceandra, former staff member at the Democratic National Committee. Would you rise so I can swear you in?

[Witnesses sworn.]

Mr. BURTON. Be seated.

We will start off with Mr. Bennett questioning for 30 minutes and then we will go to the minority.

STATEMENTS OF NANCY HERNREICH, DEPUTY ASSISTANT TO THE PRESIDENT FOR APPOINTMENTS AND SCHEDULING, ACCOMPANIED BY BOB CEARLY; KELLY CRAWFORD, FORMER STAFF ASSISTANT TO MS. HERNRICH, ACCOMPANIED BY DAVID WILSON; CAROL KHARE, FORMER ASSISTANT TO THE CHAIRMAN, DEMOCRATIC NATIONAL COMMITTEE, ACCOMPANIED BY EVAN WERBEL

Mr. BENNETT. Thank you, Mr. Chairman. In light of some of the time constraints this afternoon, and allowing appropriate time for Members——

Mr. BURTON. Pardon me. Do any of you have opening statements you would like to read into the record, or do you want to go ahead and start? Mr. Bennett.

Mr. BENNETT. I will try not to take the full 30 minutes.

Just for the record, in terms of—you are represented by very able counsel here today. Ms. Khare you are represented by, I believe, Mr. Neil Eggleston; is that correct?

Ms. KHARE. Evan Werbel is with me here right now.

Mr. BENNETT. You work with Mr. Eggleston's office? Nice to have you, sir. And, Ms. Scott, you are represented by Mr. Judd Best, Judah Best; is that correct?

Ms. SCOTT. That's correct.

Mr. BENNETT. And, Ms. Hernreich, you are represented by Bob Cearly who is in from Arkansas; is that correct?

Ms. HERNREICH. That's correct.

Mr. BENNETT. Mr. Cearly, it is nice to see you.

And finally, Ms. Crawford, you are represented by David Wilson. Mr. Wilson, it is nice to see all four of you. If at any time there are questions that you want to refer to your counsel, don't hesitate to seek their advice.

Ms. Khare, you worked in some capacity with Mr. Fowler, Don Fowler, the former Democratic National Committee chairman for, I guess, the last 20 years; is that correct?

Ms. KHARE. That's right.

Mr. BENNETT. And are you still employed with Mr. Fowler?

Ms. KHARE. Yes, I am.

Mr. BENNETT. You joined his staff at the DNC when he was chairman of DNC in January 1995?

Ms. KHARE. That's right.

Mr. BENNETT. And worked there with him until January of this year?

Ms. KHARE. Yes.

Mr. BENNETT. And, Ms. Scott, you formerly worked with the Democratic National Committee; is that correct?

Ms. SCOTT. That's correct.

Mr. BENNETT. If you would just try to swing that mic, I apologize we only have three microphones for four people.

What is your present employment, Ms. Scott?

Ms. SCOTT. I am temporarily working for the Democratic Congressional Campaign Committee.

Mr. BENNETT. Ms. Hernreich, you currently work as the Deputy Assistant to President Clinton?

Ms. HERNREICH. That's correct. And let me correct my title. The chairman indicated that it was for appointments and scheduling and that was my original title, but my title now is Deputy Assistant to the President and Director of Oval Office Operations.

Mr. BENNETT. And how long have you worked in the White House?

Ms. HERNREICH. I have been there since January 20, 1993.

Mr. BENNETT. The entire term of the Clinton administration.

Ms. HERNREICH. Yes.

Mr. BENNETT. And, Ms. Crawford, you formerly were an assistant to Mrs. Hernreich; is that correct?

Ms. CRAWFORD. That is correct.

Mr. BENNETT. And you now work at the Department of Treasury?

Ms. CRAWFORD. That is correct.

Mr. BENNETT. Ms. Khare, in your deposition before this committee, you testified that your first contact with Johnny Chung was in March 1995.

Ms. KHARE. That's right.

Mr. BENNETT. Did you have any contact with him prior to that time? Had you ever heard his name before?

Ms. KHARE. Not that I recall.

Mr. BENNETT. Exactly what was the nature of your first contact with Mr. Johnny Chung in March 1995?

Ms. KHARE. He telephoned the chairman's office at the DNC. I was given the call. I don't remember that he asked for me specifically but I was given the call. He identified himself as Johnny Chung. He said, I'm a friend of the First Lady's.

Mr. BENNETT. Where was he calling from at that time?

Ms. KHARE. He was calling from the First Lady's office.

Mr. BENNETT. From Mrs. Clinton's office?

Ms. KHARE. He said the First Lady's office. Now, I did not take that to mean he was in her office. He was somewhere in her complex of offices.

Mr. BENNETT. But he did indicate he was calling from Mrs. Clinton's office?

Ms. KHARE. Yes, he did.

Mr. BENNETT. Exactly what was the nature of the conversation you had with him at that time?

Ms. KHARE. He told me he was over there, he was a friend of the First Lady. He said, I have some important Chinese businesspeople with me. We would like to go to the radio address on—I believe that it was going to be on Saturday, sometimes they do that on Friday. And he said, Maggie Williams said that she cannot get us into the radio address, but that maybe the chairman's office could do that.

Mr. BENNETT. So according to his telephone call, he indicated that Ms. Williams, from whom we heard earlier today, had suggested that you call Mr. Fowler?

Ms. KHARE. He said that she had told him that perhaps the chairman's office could get him in. And I don't believe that he asked for Mr. Fowler when he called.

Mr. BENNETT. Did you ever put him in touch with Mr. Fowler?

Ms. KHARE. No, I did not.

Mr. BENNETT. What step—did you talk to Ms. Williams at this time?

Ms. KHARE. No, I did not.

Mr. BENNETT. What steps did you take, Ms. Khare, with respect to his desire to get into President Clinton's radio address that Saturday? This was, I think, Thursday, March 9 or Friday, March 10.

Ms. KHARE. I'm sorry; I don't know which day it was prior to the radio address.

Mr. BENNETT. What steps did you take to get Mr. Chung and his friends into the radio address?

Ms. KHARE. I told him that I did not know whether the chairman's office could get people into the radio address or not. You understand, I had only been there a few weeks; this was the first that I knew that people could go to the radio address. I did not know that anybody could go to the radio address. And so——

Mr. BENNETT. I'm not sure that just anybody can go to the radio address.

Ms. KHARE. Well, I didn't know that anybody was in the room other than the President when they did the radio address. So I told him that I would find out what we could do, and I would call him back. And he gave me the telephone number where he was, and I went away to—walked out into the reception area of the office where several people were, all of whom had been at the DNC longer than I was and knew a lot more than I did about this kind of thing. And I asked if anybody there knew whether or how we could get somebody into the radio address.

Mr. BENNETT. At that point in time, did he indicate to you the names of the individuals he was seeking to get into the radio address?

Ms. KHARE. I don't recall that he did. He said that he had Chinese businesspeople with him. I'm sure that at some point we had to get the names, but I don't remember that I took those names down then.

Mr. BENNETT. Did Evan Ryan, who—I believe her deposition transcript indicated that she procured passport numbers for these

individuals. Did you talk to Mrs. Ryan in First Lady Hillary Clinton's office at that time?

Ms. KHARE. Didn't talk to anyone in the First Lady's office. When I called Mr. Chung back to say that we had arranged for him to go to the radio address, I just called and whoever answered the telephone said Office of the First Lady, and I asked to speak with him. I did not ask for anyone.

Mr. BENNETT. Did you have any interaction with Evan Ryan with respect to the passport numbers of these six individuals?

Ms. KHARE. No, I did not. If I did, I don't recall that.

Mr. BENNETT. Exactly what did you do to arrange for Mr. Chung and his friends to get into the Oval Office to be part of the radio address?

Ms. KHARE. When I went into our outer office and asked if anyone knew how you made arrangements like that, Ms. Scott, as I recall, indicated to me that she knew someone at the White House she could call about that. And I asked her to do that and went back into my office.

Mr. BENNETT. Ms. Scott, did you in fact make the telephone call to the White House?

Ms. SCOTT. Yes, I did.

Mr. BENNETT. Whom did you call with respect to getting Johnny Chung and the delegation of Chinese representatives into the Oval Office, into the radio address?

Ms. SCOTT. I'm not sure, but I believe I called the First Lady's office.

Mr. BENNETT. And whom did you speak with or who do you talk with in the First Lady's office?

Ms. SCOTT. I don't remember exactly who it was. I do think I asked for Maggie Williams. I'm not sure that I spoke with her.

Mr. BENNETT. And if you didn't speak with Maggie Williams, who might you have spoken with?

Ms. SCOTT. It was a woman. I just don't remember who.

Mr. BENNETT. Was Ms. Williams basically your contact in the First Lady's office?

Ms. SCOTT. She was not the only contact, no.

Mr. BENNETT. Ms. Williams was a personal friend of yours at the time?

Ms. SCOTT. I wouldn't call her a personal friend. We met during the campaign. She has been helpful.

Mr. BENNETT. When was that call made—in fact that was made Friday afternoon, March 10th, wasn't it Ms. Scott?

Ms. SCOTT. I don't recall the specific date, but it was an evening and Friday; correct.

Mr. BENNETT. And was there any particular reason why you called the First Lady's office as opposed to the Visitor's Office of the White House?

Ms. SCOTT. For direction.

Mr. BENNETT. But in terms of arranging this, just basically your contact was with the staff of the First Lady's office; is that the main reason you called the First Lady's office?

Ms. SCOTT. I'm sorry; repeat your question.

Mr. BENNETT. I'm sorry. My question basically is why would you not have called the Visitor's Office of the White House or staff of

the President? What was your reason for calling the First Lady's office with respect to Mr. Chung's request?

Ms. SCOTT. It was late that evening, Friday; I remember it was late, and I knew I could get good direction from the First Lady's office. That's it.

Mr. BENNETT. Let me ask you this. It was late Friday evening, March 10th, and this was for the Saturday morning March 11th radio address; correct?

Ms. SCOTT. Yes.

Mr. BENNETT. It was somewhat of a rushed process, wasn't it, in terms of trying to check out who these people were and check out passport numbers and exactly who was being taken into the Oval Office of the White House?

Ms. SCOTT. What was your question?

Mr. BENNETT. Wasn't this somewhat of a rushed scenario here? It was late Friday afternoon, March 10th, and someone was trying to take individuals right into the Oval Office to be with the President the following morning, that Saturday morning, March 11th. It was a rush to get this done, wasn't it?

Ms. SCOTT. It didn't seem to be real rush to me.

Mr. BENNETT. Have you routinely—and I'll ask this of you, Ms. Khare, or Mrs. Crawford, or Ms. Hernreich, for that matter—have you all routinely ever had a request on a Friday night, late, with respect to trying to get people into the radio address the following Saturday morning? Ms. Scott, had you dealt with a situation like that before?

Ms. SCOTT. The only other time that I dealt with the radio address was for my godparents. And I think I called—I'm not sure exactly when I called. I think it might have been the week of.

Mr. BENNETT. Let me ask you, Ms. Khare, have you had a similar situation when you were at the DNC, when there was calls on Friday night trying to get somebody into the radio address the following Saturday morning?

Ms. KHARE. No, I don't remember any other circumstance like this, although I don't remember this to be night. I remember this being in the daytime.

Mr. BENNETT. I'm sorry. Ms. Crawford, or Ms. Hernreich, do either of you recall a situation where the afternoon before, or let's say into the evening before the President makes his radio address at the White House, that there has been an effort at the last minute to allow people to go into the Oval Office itself at the time the President is making the radio address?

Ms. Crawford, as to you, do you recall such a scenario?

Ms. CRAWFORD. On Friday afternoons, yes, that would not have been unusual.

Mr. BENNETT. Have you personally handled such efforts at the last minute?

Ms. CRAWFORD. To have people come to the radio address on Friday afternoon?

Mr. BENNETT. Yes.

Ms. CRAWFORD. Absolutely.

Mr. BENNETT. Would you normally have been the person to handle that?

Ms. CRAWFORD. Yes, I would have been a normal contact.

Mr. BENNETT. Ms. Hernreich, would you have been involved in that, or would that have been Ms. Crawford's function?

Ms. HERNREICH. I would have been involved peripherally. I think she would bring the list to me, and eventually—or come to me and say someone just called at the last minute. That would be the normal process.

Mr. BENNETT. Ms. Khare—to you, Ms. Khare—ultimately Ms. Scott advised you that the First Lady's office said that it could be arranged that this group could go into the White House; correct?

Ms. KHARE. She advised me that the group could go into the White House. I don't remember whether she said that the permission came from the First Lady's office. I just don't remember who told her.

Mr. BENNETT. And, in fact, you are the individual who ultimately called Mr. Chung?

Ms. KHARE. I returned the call to him. And the time period was not very long. He was still——

Mr. BENNETT. Still at the First Lady's office?

Ms. KHARE. Still at the First Lady's office, yes.

Mr. BENNETT. And you basically advised him that he was going to be permitted, with his six friends, to go into the Oval Office?

Ms. KHARE. I don't remember the number of friends, but yes.

Mr. BENNETT. Ms. Khare, were you ever criticized by any representatives of the National Security Council with respect to taking these steps?

Ms. KHARE. No one ever came to me from the National Security Council. I've never talked to anybody from the National Security Council. The following week or within the following few weeks, someone on my—on the DNC staff came to me and in a teasing kind of way said, the National Security Council is after you because you let those Chinese nationals have their picture made with the President. And they were—that was not at all serious, but they were telling me that—they did explain that the National Security Council was objecting to the photographs being given to the Chinese citizens, the photographs with the President.

Mr. BENNETT. In fact, Ms. Khare, I will be asking Ms. Hernreich and Ms. Crawford in a few minutes about the reaction of the President with respect to the photographs being released. But you don't know whether it was a jesting concern on the part of the National Security Council or a very deep concern. Clearly someone indicated to you that someone was upset with you at the National Security Council.

Ms. KHARE. Yes, I didn't think that the National Security Council was jesting. I did think that the person on my staff was making it a more serious thing and making it sound more serious than it was.

Mr. BENNETT. And I believe the individual at the DNC was Mr. Eric Sildon who indicated that to you?

Ms. KHARE. That is what I remember, yes.

Mr. BENNETT. Did you personally ever talk with anyone at the National Security Council about the concern of the NSC for these individuals who have been been permitted to go into the Oval Office with the President?

Ms. KHARE. No, I did not.

Mr. BENNETT. Ultimately, Ms. Khare, you not only arranged for Mr. Chung to get into the Saturday morning address, but you also handled the forwarding of the photograph to him in connection with his visit, didn't you?

Ms. KHARE. No, I did not handle the forwarding of the photograph.

Mr. BENNETT. Let me if I can, exhibit 201. You see that exhibit that is on the screen before you, Ms. Khare?

[Note.—Exhibit 201 may be found on p. 55.]

Ms. KHARE. Yes.

Mr. BENNETT. It is a fax—covering fax sheet to Johnny Chung from Carol Khare.

Ms. KHARE. Yes.

Mr. BENNETT. Subject: Photo. And I believe it reads, the White House assures me that you now have the pictures. Hurrah, I guess, is what it says.

Ms. KHARE. Something like that. Yes.

Mr. BENNETT. If you don't give me a call, have a good trip. Is that your handwriting?

Ms. KHARE. That is my handwriting.

Mr. BENNETT. So you were involved with forwarding.

Ms. KHARE. I didn't forward the photographs. What I was saying to him was I understand you now have the photographs. I did not make the arrangements or send him the photographs.

Mr. BENNETT. But clearly you did confirm with him that the photograph had been sent?

Ms. KHARE. Yes, yes.

Mr. BENNETT. Now, Ms. Hernreich, I gather that you as the Deputy Assistant to the President and the Director of Oval Office Operations—do I have that correct? Is that your title.

Ms. HERNREICH. Yes.

Mr. BENNETT. You would have had some responsibility in terms of handling logistical arrangements with respect to this kind of visit by an individual and/or foreign nationals into the Oval Office. Wouldn't you have some involvement in that?

Ms. HERNREICH. Well, specifically what do you mean by logistical arrangements?

Mr. BENNETT. Did you in any way coordinate the checking of passport numbers or anything else with respect to the individuals taken in to see the President?

Ms. HERNREICH. On this occasion, to be very honest with you, I don't recall anything about the—how they came to get into the radio address. Normally, I would not be the one who would be checking passport numbers or even forwarding those to——

Mr. BENNETT. Did you interact with Mrs. Evan Ryan, who in fact checked the passport numbers?

Ms. HERNREICH. Again, I don't remember anything about anything coming up to this radio address or Mr. Chung being in this radio address. I do not recall ever interacting with Evan Ryan regarding anything on this radio address or really any radio address.

Mr. BENNETT. If we can just briefly play the videotape of the March 11, 1995, visit by Mr. Chung and his group.

[Videotape playing.]

Mr. BENNETT. Ms. Hernreich and Ms. Crawford, were both of you there in the Oval Office on this occasion?

I hear some female voices in the background. I am trying to clarify whether you were both in the Oval office when that visit was made.

Ms. HERNREICH. I don't recall if I was in the Oval Office right then or not.

Mr. BENNETT. Ms. Crawford, were you?

Ms. CRAWFORD. Yes, I was there.

Mr. BENNETT. With respect to your appearance there, Ms. Crawford or Ms. Hernreich, if you were or were not there, who was responsible for vetting—a phrase in Washington—vetting or clearing the names of the guest list, clearing the names of those individuals before they arrived in the Oval Office to meet with the President?

Ms. CRAWFORD. Are you asking me?

Mr. BENNETT. Yes.

Ms. CRAWFORD. I can tell you the standard practice if that's what you are interested in.

Mr. BENNETT. It was your responsibility, wasn't it? Aren't you the one that was in charge of that?

Ms. CRAWFORD. Of vetting?

Mr. BENNETT. Yes, of clearing the names.

Ms. CRAWFORD. No, my responsibility was gathering the requests that would come into the radio address, and I would anywhere from a couple of weeks before a radio address to as I mentioned before, a Friday before the radio address, would take requests from people, from friends and family of the President, from various people, and then put the list together, and Nancy and I would anywhere from 2 or 3 days prior to the radio address, would sit down and try to determine, you know, who could attend.

Mr. BENNETT. And did you take those steps with respect to those individuals? Those six individuals with Mr. Chung we just saw them on the videotape.

Ms. CRAWFORD. I have a vague recollection—I mean, I know that they attended the radio address—of how they came to—it's my understanding that the request came from the chairman's office at the DNC. And as these young women who testified, I believe it was on a Friday, so it would not have been the normal practice of sitting down a couple of days ahead of time. But normally——

Mr. BENNETT. I think that is my point, if I can pick up on that. It would not have been the normal practice. Obviously, this is an event that has taken on some significance in your life in terms of depositions and appearances. I guess that's the point I was trying to make earlier. This was not the normal event to Friday afternoon, if it was not Friday night, have an individual indicate he wants to bring six foreign nationals into the Oval Office of the White House and my question is do you recall in light of this late minute request what steps you took to try to find out who these people were?

Ms. CRAWFORD. I do not recall exactly—they were not described, I don't think, in that manner to me. I understood it as a request from the chairman's office for a gentleman, Mr. Johnny Chung, to come along with six people.

Mr. BENNETT. Did you do anything about checking of passports or such things with respect to individuals to come into the country? Did anyone talk to you about that?

Ms. CRAWFORD. That was not part of our responsibility. The Secret Service.

Mr. BENNETT. Did anyone from the Secret Service talk to you about how these people managed to get into the Oval Office?

Ms. CRAWFORD. No, I don't believe so.

Mr. BENNETT. Ms. Hernreich, I think clearly at some point in time a photograph of these individuals with the President was released. Isn't that correct?

Ms. HERNREICH. I don't know if it was released or not. My recollection is that it was never released. At least my recollection is that I was called about the photograph and I never released it.

Mr. BENNETT. Well, I believe at some point in time with the photograph having been released, didn't President Clinton—and I'm just referring to page 67 of your deposition, if you want to refer to that, Mr. Cearly. I'm not trying to trap you here on this, Ms. Hernreich, I am trying to clarify. You had previously indicated, I believe, that with respect to the release of the photograph of the President with Mr. Chung and these individuals, that President Clinton said to you, and I'm referring to page 67 of your deposition, that, quote, You shouldn't have done that, end of quote, or, quote, "We shouldn't have done that." Do you see that in your deposition?

Ms. HERNREICH. Yes. May I say that my recollection is that he did not say that in regards to the photograph. I think what he was saying to me, as I recall it, that we should not have brought them in there.

Mr. BENNETT. I'm sorry. So then it was more than just the matter of the President talking about a photograph; he was specifically saying to you that these individuals should not have been brought into the Oval Office?

Ms. HERNREICH. That's my recollection.

Mr. BENNETT. Did President Clinton indicate to you what the basis of his concern was as to the matter of these people being brought into the Oval Office?

Ms. HERNREICH. Not that I recall.

Mr. BENNETT. Did he at any time express concern about National Security Council considerations? I believe at one point in your deposition I thought you indicated at page 64 that the President, President Clinton, noted—page 64, Congressman, of Ms. Hernreich's deposition—that the President expressed concern about the National Security Council having to be contacted.

Ms. HERNREICH. No, I don't believe so. I don't think it says that.

Mr. BENNETT. Could I have 1 second, please?

Mr. BURTON. Can I interrupt? I'd like to ask one question.

Mr. BENNETT. Certainly, Mr. Chairman.

Mr. BURTON. When I'm talking to my assistant and I tell her I don't think somebody should be in my office or should be talked to, she usually says, why. I mean she usually gives me some kind of a question. Did you not question the President and say, what did I do wrong or why did you object to them coming in here?

Ms. HERNREICH. No, I didn't. And I'm not really—I normally don't question him. I think what he says should go. If the President

of the United States says we shouldn't have done that, then I think we should not have done that. You're the President.

Mr. BURTON. But you have no idea why he said we should not have had them in there?

Ms. HERNREICH. My recollection, Mr. Chairman, is that there was no followup conversation and that's my recollection.

Mr. BURTON. Thank you.

Mr. BENNETT. Did you have any further conversations with President Clinton concerning his concern about these individuals having come in? Did he ever bring it up again to you?

Ms. HERNREICH. Not that I recall.

Mr. BENNETT. Ms. Crawford, I believe that in your deposition you previously indicated that you remember the President expressing some concerns about Mr. Chung and his guests; isn't that correct?

Ms. CRAWFORD. Yes, I vaguely recall.

Mr. BENNETT. Did you talk with President Clinton about his concerns about these people having been brought into the Oval Office?

Ms. CRAWFORD. No, I did not. I don't recall any specific conversation, no.

Mr. BENNETT. Ms. Crawford, did you take any steps with respect to these concerns that were raised by the President? Specifically, did you contact the National Security Council after the fact to followup on this?

Ms. CRAWFORD. I have—I recall that my concern, because I would also deal with the photographs from the radio address, was making sure or seeing if it was appropriate to hand out these photographs. So I do have a recollection of after the radio address, very shortly after, contacting or giving a note to someone in the National Security Council. I'm not sure if it was——

Mr. BENNETT. Did you take the names of Mr. Chung and his six guests to the National Security Council so someone could do a little bit of a check on these people?

Ms. CRAWFORD. During my——

Mr. BENNETT. Not a little bit of a check; any kind of a check. Did you take those names to the NSC?

Ms. CRAWFORD. During my deposition I did see a document that the names were forwarded to Nancy Soderberg, and I may have been the person that passed that note down or walked it down.

Mr. BENNETT. In that regard, maybe it would help you a little bit if I could have exhibit 196. If we can increase the—bring that up a little bit. Ms. Crawford, showing you exhibit 196, it's on the TV screen and I believe it's in the exhibit book there before you.

[Exhibit 196 follows:]

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 10:12 am
SENDER: Darby, Melanie B.
SUBJECT: Subject: PHOTOS? [UNCLASSIFIED]
TO: Hill, Roseanne M.
Roth, Stanley O.
Suettinger, Robert L.

CC: NO CC's on THIS MESSAGE

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):

HONGYE ZHENG
Chairman, China Council for the Promotion of Int'l Trade (CCPIT)
Chairman, China Chamber of Int'l Commerce (CCOIC)

YAN SANZHONG
President, China Petro-Chemical Corporation

JICHUN HUANG
Vice President, China Int'l Trust and Investment Corp.

RENZHONG WANG
Vice Chairman and President, Shanghai AJ Shareholding Corp.

JAMES J. SUN
Young Entrepeneur of Xinjiang, self-made multi-millionaire, Urumqi Talhe Industry Co.

JIANIONG YU
Chief, American and Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

JOHNNY CHUNG
Chairman & CEO, AISI

Thanks very much for your help.

EXHIBIT
196

EOP 005438

Ms. CRAWFORD. Yes, I have it here.

Mr. BENNETT. Which is a memorandum from Brooke Darby of the National Security Council to Robert Suettinger of the National Security Council. Do you see that it is dated April 7, 1995?

Ms. CRAWFORD. Yes, I do see it.

Mr. BENNETT. That is approximately 4 weeks after the radio address. And you'll note the comments there, I believe it says Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow, and Nancy needs to know urgently whether or not she can give them the pictures. Do you see that?

Ms. CRAWFORD. Yes, I do.

Mr. BENNETT. Ms. Crawford, I'll show you also exhibit 198, which is apparently a notation of e-mail in terms of the response of Mr. Suettinger back to Ms. Darby. In that exhibit 198 there is Mr. Suettinger's comment about Mr. Chung in that exhibit to the effect that, quote, "My impression is that he is a hustler," a quote that has been repeated a few times today by Members of both political parties.

Ms. Crawford, is there any reason why these memos would be dated April 7th and not March 11th if you immediately addressed the question on Saturday morning with the National Security Council?

[Exhibit 198 follows:]

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 11:24 am
SENDER: Suettinger, Robert L.
SUBJECT: Subject: RE: PHOTOS? [UNCLASSIFIED]
TO: Darby, Melanie B.

CC: Roth, Stanley O.

The joys of balancing foreign policy considerations against domestic politics. . . I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the DNC, who am I to complain? Neither do I see any unalloyed benefit, either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide (present or former) Chinese officials, with the possible exception of James Y. Sun, "young entrepreneur and self-made millionaire." Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

But a caution – a warning of future déjà vu. Having recently counselled a young intern from the First Lady's office who had been offered a "dream job" by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler, and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials. My concern is that he will continue to make efforts to bring his "friends" into contact with the POTUS and FLOTUS – to show one and all he is a big shot, thereby enhancing his business. I'd venture a guess that not all his business ventures – or those of his clients – would be ones the President would support. I also predict that he will become a royal pain, because he will expect to get similar treatment for future visits. He will be persistent.

Bob

From: Darby, M. Brooke
To: @ASIA - Asian Affairs
CC: /R, Record at A1
Subject: PHOTOS? [UNCLASSIFIED]
Date: Friday, April 07, 1995 01:12 PM

An odd situation on which I need some guidance for the President's office asap.

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so)

Ms. CRAWFORD. I did not write these memos or e-mails, so I don't know why they would be dated.

Mr. BENNETT. I guess my question is, is it your recollection that you dealt immediately with this that same Saturday, March 11th?

Ms. CRAWFORD. I believe that I followed up very shortly after the radio address. I believe I followed up on Saturday, but you know I'm not sure if it was Saturday or maybe Monday. Maybe people weren't in on Saturday. I believe I followed up shortly thereafter.

Mr. BENNETT. Looking at exhibit 196, if we could have that back on the screen, please. There is reference to—trying to have a visit with you. Do you recall the visit of Mr. Johnny Chung to see you the following day on April 8th with respect to the photographs taken in the Oval Office?

Ms. HERNREICH. No.

Mr. BENNETT. Do you have any recollection of any followup visit by Mr. Chung?

Ms. HERNREICH. No, I don't.

Mr. BENNETT. Do you have any recollection of speaking with Ms. Crawford with respect to her contact with the National Security Council, whether it was on March 11th or April 7th?

Ms. HERNREICH. No, I don't have any recollection of speaking with her about conversations she had with the NSC.

Mr. BENNETT. Ultimately, what was the response of the National Security Council? What was the position?

Ms. HERNREICH. Well, I don't recall——

Mr. BENNETT. I'm sorry; Ms. Crawford, you wanted to add something?

Ms. CRAWFORD. Yes, exhibit 187?

Mr. BENNETT. I'm sorry.

Ms. CRAWFORD. Exhibit 187 in my book indicates—which was shown to me during my deposition—the name and listed the delegations and a note that went to Nancy Soderberg, who is in the NSC.

[Note.—Exhibit 187 may be found on p. 85.]

Mr. BENNETT. I was going to get to that in a second. We could go to that now if you like.

Ms. CRAWFORD. This is what I would believe would have been the contact shortly thereafter, which would have been 2 days thereafter.

Mr. BENNETT. Ms. Crawford, do you recall Ms. Darby calling you and advising you not to permit this photograph to be released?

Ms. CRAWFORD. I don't specifically recall a conversation with Ms. Darby.

Mr. BENNETT. I thought at page 62 of your deposition you indicated——

Ms. CRAWFORD. I'm sure that I talked with Ms. Darby, but I don't specifically recall what she told me to do with the photographs.

Mr. BENNETT. Well, Ms. Brooke Darby of the National Security Council is testifying before this committee tomorrow afternoon and according to comments she has made to members of the staff of this committee, she indicates that she specifically told you, Ms. Crawford, not to have photographs of Mr. Chung and his guests released. And I interpreted that comment made recently by her in

preparation for her appearance here tomorrow to be consistent with your deposition testimony where you indicated, I thought, that you recalled her in fact calling you, saying don't release this photograph.

Ms. CRAWFORD. Can you show me in my deposition—I recall having a conversation with Ms. Darby about this, but I don't specifically recall her saying——

Mr. BENNETT. Let me address the points you were trying to make on the exhibit. Ms. Hernreich, directing your attention to exhibit 187, 187, if we can also put up—first of all, exhibit 171–1—171–1 is the second page of a letter forwarded by Mr. Chung. And then now looking at exhibit 187, that is handwriting and notation on that second page. Do you see that Ms. Hernreich?

Ms. HERNREICH. 187?

Mr. BENNETT. Yes.

Ms. HERNREICH. Yes.

Mr. BENNETT. Directing your attention to exhibit 187, that is actually your handwriting, isn't it, Ms. Hernreich?

Ms. HERNREICH. Yes, that's correct.

Mr. BENNETT. And referring to that exhibit, correct me if I am wrong, but I believe—if I am not reading that correctly tell me—but the handwriting reads someone from DNC asked to let into radio address before photos are sent out; we need to know if we should not send them. Isn't that correct?

Ms. HERNREICH. That's what it says.

Mr. BENNETT. Ms. Khare, ultimately you did learn that the White House, in fact, sent the photographs, correct, as reflected by the fax that was sent out?

Ms. KHARE. That fax reflects that. I do not independent of that fax remember what the final outcome was of this.

Mr. BENNETT. But clearly the fax reflects that it was sent, and I guess my question to all of you is do any of you know the individual at the White House—this is directed to the entire panel of four—the individual at the White House who made the decision to send these photographs of President Clinton and Mr. Chung and his friends out to Mr. Chung, despite the warnings of the National Security Council? Do you know who made that decision?

Ms. HERNREICH. Mr. Bennett, may I speak for a moment?

Mr. BENNETT. Certainly.

Ms. HERNREICH. Do we know for certain that that photograph with the group was sent out? And, you know, my recollection is that Mr. Chung called quite a bit about these photographs and that they were never released. Only yesterday did I find out that he had, in going through some of this that he had received any photographs, and I'm wondering whether he received only the photograph of him and his brother, and that the photographs of the entire group were never released. I've not seen that photograph in any of his literature or anywhere else. It is my recollection that those photographs were never sent to him.

Mr. BENNETT. Ms. Hernreich, I will tell you on behalf of the committee, we're going to be interviewing Mr. Chung tomorrow under oath, and that is one of the many things we would like to find out. And, Mr. Chairman, if I can have 30 more seconds, I will be finished. Just one last thing, Ms. Hernreich, if you would—specifically

referring to exhibit 215, you also, Ms. Crawford, or actually, Ms. Hernreich, either one of you, those of you who were working at the White House, this is an e-mail at the White House dated November 30, 1995. Do you see that? Where there is a specific notation that as of November 22, 1995, we will not honor requests from Johnny Chung. And there is reference to his, quote, improperly using photo or business—photo of businesspeople and the President. Do you recall receiving this e-mail, Ms. Hernreich?

[Exhibit 215 follows:]

RECORD TYPE: PRESIDENTIAL (ALL-IN-1 MAIL)

CREATOR:Kathleen M. Hennessy (HENNESSY_K) (WHO)

CREATION DATE/TIME:22-NOV-1995 11:31:31.38

SUBJECT:requests

TO:Lori A. Wiener (WIENER_L) (WHO)
READ:30-NOV-1995 10:53:14.48

TO:Janet M. Philips (PHILIPS_J) (WHO)
READ:22-NOV-1995 14:54:44.37

TEXT:
To: Lori Wiener
To: Janet Philips
Re: Johnny Chung
As of 11/22/95 per Bob McNeely, we will not honor requests from Johnny Chung, CEO of AISI. He has been improperly using photo of business people and the President. Bob suggests telling him the photos were ordered and sent out and can not be reordered.
He has been asking through the West Wing office but he might find our office at some point.
Thanks,
Kathleen

EOP 068372

EXHIBIT
215

Ms. HERNREICH. No, I don't. The e-mail is not to me.

Mr. BENNETT. Do you recall receiving it, Ms. Crawford? Did you ever see this e-mail?

Ms. CRAWFORD. No, this is the first time I believe that I have seen this.

Mr. BENNETT. Do either of you ever recall any conversations concerning the policy that was established as of November 22, 1995, at the Clinton White House in light of Mr. Chung's use of these photographs? Do either one of you recall that?

Ms. HERNREICH. Mr. Bennett, what I recall, and my memory is not great a lot of the time, but what I recall is conversations with the photo office that we would not send those photographs of the businesspeople with Mr. Chung from the beginning. That's my recollection of my conversations.

Mr. BENNETT. My question is in terms of this—Mr. Chairman, I am finished. Thank you—that e-mail clearly establishing a policy in November 1995, neither of you recall actually seeing that e-mail or being aware of its issuance at the White House?

Ms. HERNREICH. That's correct.

Ms. CRAWFORD. I do not recall, no.

Mr. BENNETT. Thank you, I have no further questions, Mr. Chairman. Thank you.

Mr. BURTON. Mr. Waxman.

Mr. WAXMAN. Ms. Hernreich, I understand you essentially serve as President Clinton's gatekeeper. Can you explain what that means?

Ms. HERNREICH. Well, I am basically responsible on a daily basis for who he sees, what paper he sees, what phone calls he receives, that sort of thing. So for all of those things, I am his gatekeeper.

Mr. WAXMAN. And you manage a staff of how many people?

Ms. HERNREICH. Yes, I have 9 or 10 people.

Mr. WAXMAN. And you manage the flow of paper to the President, memos, letters, notes and other individual orders that people want to get to the President?

Ms. HERNREICH. That's correct.

Mr. WAXMAN. Do you keep his schedule?

Ms. HERNREICH. What we try to do is implement the schedule every day. That is part of our responsibility, to make sure that he does what he's supposed to be doing as it relates to the schedule, and that he accomplishes the goals that he's supposed to accomplish each day.

Mr. WAXMAN. And you field a lot of phone calls?

Ms. HERNREICH. Yes, we do take a lot of phone calls.

Mr. WAXMAN. And you handle visitors to the Oval Office?

Ms. HERNREICH. That's correct.

Mr. WAXMAN. Does that include staff who will be meeting with the President?

Ms. HERNREICH. That's correct.

Mr. WAXMAN. Does your office handle the President's personal correspondence?

Ms. HERNREICH. That's correct.

Mr. WAXMAN. I would like the committee to understand what a typical day is like for you. I understand you work 6 days a week. How many hours do you typically work each day?

Ms. HERNREICH. Usually the minimum is 12 hours.

Mr. WAXMAN. How many pieces of paper do you review in a typical day?

Ms. HERNREICH. I would say at a minimum 150 pieces of paper.

Mr. WAXMAN. Do you have to do a quick review of where to send the pieces of paper? Is that your job?

Ms. HERNREICH. Correct. I also review the paper that goes to the President. Often it will come from the staff or other sources. I review that. And I view correspondence, other pieces of paper that come to me, and then I decide where to send them.

Mr. WAXMAN. How many visitors to the President does your office deal with on a typical day?

Ms. HERNREICH. Including the staff, oh, at least 100.

Mr. WAXMAN. And you help to determine who gets in and who doesn't?

Ms. HERNREICH. That's correct.

Mr. WAXMAN. How many phone calls does your office field in a typical day?

Ms. HERNREICH. Including staff, we get a lot of phone calls from staff, not asking to speak to the President but asking us what the President is doing or an opinion of what he might want on something, so I would say probably that same amount, 100, 150 phone calls at least a day.

Mr. WAXMAN. How many of those do you personally return, do you think?

Ms. HERNREICH. I speak to a lot of the staff people directly. I return a lot of my own phone calls. If I don't get them done that day, I will return them the next day or the first opportunity I have.

Mr. WAXMAN. In a typical day you are required to review hundreds of pieces of paper, talk to dozens of individuals in person, speak to dozens of people on the phone, keep the President on schedule, manage a staff of 9 and handle any emergencies that might come up?

Ms. HERNREICH. That sounds like a typical day.

Mr. WAXMAN. And you do that 6 days a week.

Ms. HERNREICH. Normally 6 days a week.

Mr. WAXMAN. It sounds like you are constantly in motion.

Ms. HERNREICH. That's true.

Mr. WAXMAN. Were you involved in organizing the President's radio addresses?

Ms. HERNREICH. Yes.

Mr. WAXMAN. What was your role in regard to those events?

Ms. HERNREICH. My role is to primarily oversee the—to go over with my assistant the last list and determine who actually gets into the radio address.

Mr. WAXMAN. What's the purpose of inviting guests to attend the radio address?

Ms. HERNREICH. The purpose is basically to—because—give the President an opportunity to visit with his friends and his friends to see him. Another reason to have people at the radio address is because staff people often want to bring their families in to meet the President and we really don't have a good opportunity during the week to do that. So this is a nice way to have an audience and then afterwards to have photographs. And so a chance for them,

staff and cabinet members, to bring their families in to meet the President.

And the third reason is actually it's good for the President. He enjoys having an audience. He loves people, and he wants to be accessible to his staff and to his friends and there's not that time often and so this is a good chance for that. And it makes him feel good. And I think it puts a nice tone on the radio address for him. He likes it.

Mr. WAXMAN. How many radio addresses does he give each year?

Ms. HERNREICH. I think—well, he gives one a week. 52. We have audiences, I think, for about 40 a year because he probably does about 40 in the office.

Mr. WAXMAN. Forty a year in which you have audiences?

Ms. HERNREICH. That's correct.

Mr. WAXMAN. How many people are typically in an audience?

Ms. HERNREICH. Probably about an average of 60. Some days there are 100, some days 40.

Mr. WAXMAN. So we are talking about over 10,000, maybe 15,000 people attending a radio address since the start of the Clinton administration in 1993? Does that sound about right?

Ms. HERNREICH. That sounds about right.

Mr. WAXMAN. Do you remember each of the 10- to 15,000 people who attended the radio address?

Ms. HERNREICH. No, I don't.

Mr. WAXMAN. How long have you been working for the President?

Ms. HERNREICH. I've been working for the President since 1985, when he was Governor.

Mr. WAXMAN. So around 12 years. And you've been at the White House for 4½ years now. In your experience, is the President pretty courteous to people?

Ms. HERNREICH. Pardon me?

Mr. WAXMAN. Is the President a courteous individual?

Ms. HERNREICH. He is extremely courteous. He loves people. And he wants to do things for other people. And this is a great opportunity for him to do that. He has a heart of gold.

Mr. WAXMAN. We saw a videotape of the President greeting Johnny Chung. Would you say that was unusual for the President when he greeted Johnny Chung?

Ms. HERNREICH. No, it's not unusual at all.

Mr. WAXMAN. He's friendly.

Ms. HERNREICH. He greets most of his friends like that.

Mr. WAXMAN. And does the President get his picture taken with lots of people?

Ms. HERNREICH. Lots of people.

Mr. WAXMAN. Does the President generally smile when someone wants their picture taken with him?

Ms. HERNREICH. Absolutely.

Mr. WAXMAN. Because of the nature of your job, do you generally know who the President's personal friends are?

Ms. HERNREICH. Yes, I do.

Mr. WAXMAN. Was Johnny Chung a personal friend of the President?

Ms. HERNREICH. The President considered Johnny Chung a personal friend.

Mr. WAXMAN. Did you have any role in helping Johnny Chung attend the March 11, 1995 radio address?

Ms. HERNREICH. I honestly don't remember anything leading up to the time that he—what took place that caused him to come to the radio address.

Mr. WAXMAN. Did you have any conversations with Maggie Williams about Johnny Chung's request to attend the radio address?

Ms. HERNREICH. I don't recall any conversations with Maggie Williams about him coming to that radio address.

Mr. WAXMAN. Did Evan Ryan contact you to request that Johnny Chung be allowed to come to that radio address?

Ms. HERNREICH. I don't recall that Evan Ryan called me at all on that.

Mr. WAXMAN. Did you have any conversations with anyone else in the First Lady's office requesting that Johnny Chung be allowed to attend this radio address?

Ms. HERNREICH. No, I don't believe so.

Mr. WAXMAN. And I think you testified you don't remember seeing Johnny Chung at the radio address.

Ms. HERNREICH. I don't remember it, no.

Mr. WAXMAN. Let me ask you a few bottom line questions about Johnny Chung. Did Johnny Chung ever tell you that he would make a contribution if he could attend the radio address?

Ms. HERNREICH. Absolutely not.

Mr. WAXMAN. Did Johnny Chung ever talk to you about political contributions?

Ms. HERNREICH. No.

Mr. WAXMAN. Did Johnny Chung ever talk to you about policy matters? Did he ever tell you that he was trying to get a change in U.S. policy?

Ms. HERNREICH. No.

Mr. WAXMAN. And did you ever solicit contributions from Johnny Chung?

Ms. HERNREICH. No.

Mr. WAXMAN. While I'm on the subject, let me ask you some very general questions. While you worked at the White House, did you ever solicit contributions from anyone?

Ms. HERNREICH. Absolutely not.

Mr. WAXMAN. And did you ever observe any White House staffers soliciting contributions from anyone?

Ms. HERNREICH. No.

Mr. WAXMAN. Ms. Khare, Johnny Chung called you in March 1995. Did you know who he was at that time?

Ms. KHARE. No, I didn't.

Mr. WAXMAN. And he identified himself as Johnny Chung, I assume.

Ms. KHARE. He did.

Mr. WAXMAN. And he said, what, he's a friend of the First Lady's?

Ms. KHARE. He said I'm a friend of the First Lady.

Mr. WAXMAN. Did he say he was calling from the First Lady's office?

Ms. KHARE. Yes, he did.

Mr. WAXMAN. And he also said that Maggie Williams couldn't help him get into the radio address.

Ms. KHARE. That's right.

Mr. WAXMAN. You had someone in your office handle the request after he had called; isn't that right?

Ms. KHARE. That's right.

Mr. WAXMAN. You asked Ms. Scott to see what she could do about it?

Ms. KHARE. I asked if anyone knew what could be done about it, and Ms. Scott volunteered to try.

Mr. WAXMAN. You didn't handle that request yourself.

Ms. KHARE. No. I really didn't know how.

Mr. WAXMAN. OK. You didn't tell Chairman Fowler about the request.

Ms. KHARE. Not that I recall. I don't think I did.

Mr. WAXMAN. You eventually passed it off to Ms. Scott.

Ms. KHARE. Yes.

Mr. WAXMAN. And Ms. Scott told you that the request had been approved at some point that day.

Ms. KHARE. Yes.

Mr. WAXMAN. And you called Mr. Chung back at the First Lady's office to let him know; is that right?

Ms. KHARE. That's right.

Mr. WAXMAN. You don't remember his name being mentioned in the office before that time?

Ms. KHARE. No, I don't. I know now from discussions and depositions and, that kind of thing, that he had been in the office a few days before, but I was not aware of that at the time.

Mr. WAXMAN. Did you know at the time that he had made any campaign contributions?

Ms. KHARE. No.

Mr. WAXMAN. The way you handled Johnny Chung's request was the same way you would have handled any friend or supporter's request that attend a radio address; is that right?

Ms. KHARE. I hope so, yes.

Mr. WAXMAN. You didn't just do this for financial contributors. You did it for others, as well?

Ms. KHARE. Yes.

Mr. WAXMAN. You didn't accept Johnny Chung's invitation to travel to China, did you?

Ms. KHARE. No, I didn't.

Mr. WAXMAN. And Chairman Fowler didn't accept his offer either, did he?

Ms. KHARE. No.

Mr. WAXMAN. OK. There was a question about whether he should get—let me ask Ms. Scott some questions first. Let me get to that.

Ms. Scott, you said that Carol Khare asked you to find out if Johnny Chung and his guests could attend that March 11th radio address; is that right?

Ms. SCOTT. That's correct.

Mr. WAXMAN. OK.

Ms. SCOTT. She made a general statement in the office.

Mr. WAXMAN. And did you know how to handle that?

Ms. SCOTT. Not specifically. I said I would make a call to a friend.

Mr. WAXMAN. You made a call to the First Lady's office to see what you could do?

Ms. SCOTT. I think so.

Mr. WAXMAN. And the purpose of that call was to have someone lead you in the right direction; is that correct?

Ms. SCOTT. That's correct.

Mr. WAXMAN. As I recall your testimony, you didn't recall whether you spoke to Ms. Williams at that time, but you talked to somebody there.

Ms. SCOTT. That's correct.

Mr. WAXMAN. And do you think someone took a message, and someone called you back. Is that your recollection of what happened? Or did they arrange it right on the spot?

Ms. SCOTT. They called me back.

Mr. WAXMAN. OK. Is it possible that someone from another office in the White House, someone in the President's office might have called you back?

Ms. SCOTT. I don't think so, but I'm not sure.

Mr. WAXMAN. In addition to the radio address attended by Johnny Chung, you made arrangements for some family members to attend a radio address; isn't that right?

Ms. SCOTT. That's correct.

Mr. WAXMAN. And at that time, did you call the First Lady's office?

Ms. SCOTT. Yes, I did.

Mr. WAXMAN. Is it possible that your—OK. You're not confusing this call with the call about Johnny Chung?

Ms. SCOTT. I don't think so. I'm not sure.

Mr. WAXMAN. Now, Johnny Chung was at this White House radio address. And we saw the videotape that some photos were taken of him and his guests. Wouldn't it have been routine for him to get the photos? Who would have been in charge of the photos? Would that be the White House or the DNC?

Ms. HERNREICH. It would have been our office. My assistant normally is the person responsible for sending the photos out after the radio address.

Mr. WAXMAN. Ms. Crawford, why was there a hang up about the photos?

Ms. CRAWFORD. I believe we wanted to make sure that we knew who these people were and that it was appropriate to send the photographs out.

Mr. WAXMAN. And eventually someone from the National Security Council had to take a look at this; is that right? That was Mr. Suettinger.

Ms. CRAWFORD. From the e-mails, evidently, that's the process that happened.

Mr. WAXMAN. I want to yield to Mr. Fattah for some further questions on this.

Mr. FATTAH. Thank you very much. Let me—Ms. Scott, I want you to answer the same question that Congressman Waxman asked

of someone else. You were also invited to travel with Johnny Chung?

Ms. SCOTT. Yes, sir.

Mr. FATTAH. And you declined a trip to China?

Ms. SCOTT. Yes, I did. It seemed inappropriate.

Mr. FATTAH. OK. So Johnny Chung made a lot of invitations, and people declined it. Let me go back to this radio address. I was at one of the President's radio addresses.

Ms. HERNREICH. We do have Members of Congress to attend.

Mr. FATTAH. I appreciated the opportunity to be there.

Ms. HERNREICH. Good.

Mr. FATTAH. And we've heard that Mrs. Scott's godparents were also there.

Ms. HERNREICH. Yes.

Mr. FATTAH. So it was pretty regular that people could get invited or could get themselves invited to be at a radio address of the President.

Ms. HERNREICH. We had invited guests every week we do the radio address in town. At times, the President is out of town or out of the country on a Friday or Saturday, and so, in those cases, we would not have an audience.

Mr. FATTAH. Let me ask a question, because a lot of—this is an investigation into foreign campaign dollars, getting into the 1996 elections. And we may seem somewhat far afield focusing on this radio address on these six gentlemen since there's no evidence that the committee has that any of these six gentlemen donated any money in the Presidential election. So whether they were or weren't at a radio address, whether they did or didn't receive pictures is pretty far afield only. The only connection to it is Johnny Chung, because these gentlemen, from everything that this committee knows, didn't give a dime to President Clinton's re-election campaign or to the DNC or to anything. All they—they were visiting. The person who was escorting them, said, look I can get you in to get a picture with the President, and he arranged it.

So in terms of Johnny Chung, which is really, I would assume, our real focus, not how somebody got into the radio address, since more than 10,000 people had been in radio addresses, is in terms of Johnny Chung. He was a friend of the President. He was a supporter of the President.

Ms. HERNREICH. That's correct. The President, may I just mention, has friends that he's had all of his life, his high school friends and college friends. But he considers friends people who are helpful to him. He's very——

Mr. FATTAH. I totally understand. Bob Dole ran for President in the same election. He had a friend. His name was Fireman. He was the chairman or Deputy chairman of his Campaign Finance Committee. And he went about trying to help Bob Dole, his friend. And he arranged to launder some money through a Hong Kong bank back through into the Dole campaign. He pleaded guilty and had to pay a $6 million fine and was put essentially under house arrest for a few months.

And in the entire prosecution of the case, it was asserted by the U.S. attorney that Bob Dole knew nothing about how his friend went about raising this money, that Bob Dole was never impli-

cated. There was not even an inference that Bob Dole had any idea. All he knew was that his friend was helping him.

Now, there's no proof whatsoever that Mr. Chung has done anything wrong. But do you have any reason to believe that, if he had done something wrong, that the President would know about it?

Ms. HERNREICH. I have no reason to believe that.

Mr. FATTAH. If the President had some knowledge that a friend of his is doing something wrong vis-a-vis his campaign, wouldn't the President direct him to stop it?

Ms. HERNREICH. Yes, he would.

Mr. FATTAH. So now, unless Mr. Chung was operating as an agent of the President or of his campaign, even if he did something wrong, don't you think it's kind of strange that, since, in none of these other cases—let me give you another example. The Speaker of the House, there was a foreign arms dealer who gave tens of thousands of dollars to Speaker Gingrich's campaign, but there's no assertion by anyone that Newt Gingrich had any idea that this person was funneling money improperly in to the Speaker's political efforts.

So it is of interest as we sit here today focused on this silliness of this radio address in these pictures, which has nothing to do whatsoever with the subject matter of this investigation. Johnny Chung does. And how he got his money and where the money came from, that's an important issue, but it has nothing to do with this radio address unless the chairman or the majority can show some connection.

Now, supporters of the President, and some of them get cuff links from the President, some of them get a picture, some of them get a smile. But as best we know from Johnny Chung, he never sought any policy or preferential treatment in terms of policy decisions at all. And in terms of his interaction with the President, do you have any information to the contrary in terms of that?

Ms. HERNREICH. No. I have no information to the contrary.

Mr. WAXMAN. Would the gentleman yield for a minute?

Mr. FATTAH. I'll be glad to yield.

Mr. WAXMAN. Ms. Hernreich, we saw the videotape. The President met with all these people, took the picture. After that radio address, he said something to you about how they shouldn't be bringing all those people in. What did he say to you?

Ms. HERNREICH. Well, my recollection of what he said was we should not—you should not have done that. And that's all I recall that he said to me, and with no explanation.

Mr. WAXMAN. In other words, he sort of had some sense that he was being used.

Ms. HERNREICH. Well, it's—I can't tell you exactly what he meant by it, because he just said that. But that—whether he was being used or that they were inappropriate people to bring to the radio address or inappropriate people for him to meet with. But, again, I did no followup questions. He didn't explain it. That's my recollection. And so I would only have to infer what he meant by it.

Mr. WAXMAN. Now, after that, somebody at the National Security Council was asked to give some advice as to whether these pictures

ought to be given to Johnny Chung. Do any of you at the table know how the NSC was asked to give some view on this?

Ms. HERNREICH. Well, I think they were asked to do it because I sent a note to Nancy Soderberg and asked her whether it was appropriate to send the photos out. Is that what you're asking?

Mr. WAXMAN. Yes.

Ms. HERNREICH. Yes. I think that's why they did it.

Mr. WAXMAN. So Nancy Soderberg then asked Suettinger?

Ms. HERNREICH. Well, I don't know. No, I think Nancy Soderberg's assistant probably just took care of it herself and then asked Mr. Suettinger about it. That's what it indicates on this e-mail.

Mr. WAXMAN. Mr. Suettinger sent an e-mail. You heard some of the people on the other side of the aisle; they talk about it as if it was an all points NSC advisory bulletin concerning Johnny Chung. But as I—as all of you are assuredly aware now, and we'll hear from Bob Suettinger tomorrow, that they responded to this request for advice about the release of the photographs, and then they sent an e-mail saying this guy looks like a hustler.

But he also said it didn't seem like it was going to endanger U.S. foreign policy—my words, not his—to give the man a photo with the President. I think it's critical to note that Bob Suettinger's e-mail accurately describes Johnny Chung as a hustler and doesn't even object to the release of the photos. He said it was OK with him to release the photos. And I gather the photos were eventually released; is that correct?

Ms. HERNREICH. Again, I question whether the photos with the groups were ever released. I really don't think they were.

Mr. WAXMAN. Well, Ms. Khare, you sent some note, like, hooray, the photos are going to be released. What were you referring to?

Ms. KHARE. Yes. And until I saw this fax, I really don't remember the photos being released. And I see this fax, so some photos must have been sent to him. But I really don't remember whether or not—I don't know one way or the other about these questionable photos.

Mr. WAXMAN. Johnny Chung evidently was pestering people about the photos. Who did he call? Did he call you, Ms. Khare?

Ms. KHARE. I don't remember whether he called me. I know that he called some people at the DNC. And I know that he sent a letter to a couple of people at the DNC. So I was aware of the photo hunt.

Mr. WAXMAN. Thank you, Mr. Fattah. I yield back to you if you have more questions.

Mr. FATTAH. Thank you again. Because I think that—when these gentlemen came in and got their picture taken with the President, when they were in the radio address, nobody had any envelopes with them stuffed with cash or anything like that, right?

Ms. HERNREICH. I don't recall being in the room, so——

Mr. FATTAH. OK. Ms. Crawford, you were in the room, right?

Ms. CRAWFORD. Yes. I don't believe anyone—not that I saw, no.

Mr. FATTAH. Let me ask you this question, because there is a lot of attention focused on the fact that they were foreign nationals. Was it unusual that people who were visiting our country and had associations with people who knew the President would want, get a chance for these people to meet the President?

Ms. HERNREICH. No. I don't think it is unusual for anybody to want to bring their friends and associates in to meet the President.

Mr. FATTAH. When the President travels overseas, you see tens of thousands of people——

Ms. HERNREICH. Absolutely.

Mr. FATTAH [continuing]. Line up just to get a glimpse of him.

Ms. HERNREICH. Absolutely.

Mr. FATTAH. So the President of the United States is a pretty important person. That's why you said, when the chairman asked you, well, did you ask him what he meant, you said, you don't ask the President of the United States, you just——

Ms. HERNREICH. You just do what he says.

Mr. FATTAH. Right. So the fact that Johnny Chung, who was a friend of the President, who was trying to do business in a foreign land, wanted to bring some associates through, in and of itself is not something that would be beyond someone's understanding that it might be something that he would want to do.

The President, however, sensed that it might have some inappropriateness and cautioned you about it. So the President, when given—because he was not aware of any of this, these other activities leading up to these people showing up at the radio address. But the minute he sensed something, he felt that perhaps it was somewhat inappropriate.

So what we do know about the President's actions in this regard is that, when he sensed that something was inappropriate, he took some action about it, which was to direct you that there should be more appropriate concern taken as to people who Mr. Chung might want to bring into the White House.

Ms. HERNREICH. That's correct, Congressman.

Mr. FATTAH. So for those of us who, because there are a few members of our committee who want to impeach the President of the United States of America—it's not a widely held view in the Congress or among the American public, but just so people can have a glimpse of what he said in private to you when this group of people were in there and got their picture taken; it was someone who, as we would suspect, was attempting to do what was right and honorable.

So I just think that, again, this committee's attempt to seek out foreign money—let me just go down the line here.

Do any of you have anything that you would want to—that you know about in terms of illegal foreign contributions coming into the 1996 elections? Do you have any information about that?

Ms. HERNREICH. Absolutely not.

Mr. FATTAH. Ms. Crawford.

Ms. CRAWFORD. No.

Mr. FATTAH. Ms. Khare.

Ms. KHARE. No.

Mr. FATTAH. Ms. Scott.

Ms. SCOTT. [Nodding in the negative.]

Mr. FATTAH. And do you have any knowledge that the Democratic party or President Clinton sought or solicited donations, illegal foreign contributions in that campaign?

Ms. HERNREICH. No.

Ms. CRAWFORD. No.

Ms. KHARE. No.

Ms. SCOTT. No.

Mr. FATTAH. In terms of the subject matter of this hearing, Mr. Chung, do you know of him violating any laws in our country?

Ms. HERNREICH. No, I don't know of him violating any.

Mr. FATTAH. Do you know of him providing any foreign money that was illegal in the campaign?

Ms. HERNREICH. I don't know of anything.

Mr. FATTAH. Do you know of him violating—I mean, he didn't barge into the White House. He requested the opportunity. He was checked through. Miss Kelly—Ms. Crawford, was he checked through by the Secret Service for admission into the White House?

Ms. CRAWFORD. Everyone that comes onto the White House grounds has to go through the process.

Mr. FATTAH. So even if you said that someone could come and they could be in a radio address, for security purposes, the Secret Service runs their own check.

Ms. CRAWFORD. We provide the Secret Service—or whoever——

Mr. FATTAH. You give them a name and and you give them information pertaining to that person?

Ms. CRAWFORD. Yes.

Mr. FATTAH. And then they get back to you and let you know—they make a decision, an independent decision based on their responsibilities to protect the physical health of the President as to whether that person can come in; is that correct?

Ms. CRAWFORD. That's my understanding.

Mr. WAXMAN. Mr. Fattah, before we run out of time, I do want to yield some time to Mrs. Maloney. And then we'll get further chances for questions on the 5-minute rounds.

Mrs. Maloney.

Mrs. MALONEY. Thank you, Mr. Chairman. I would like to ask all of you the same question. You can answer yes or no starting at this end. I would just like to ask you if you have any reason to believe that Johnny Chung was an agent of the Chinese Government, yes or no?

Ms. SCOTT. No.

Ms. KHARE. No.

Ms. CRAWFORD. No.

Ms. HERNREICH. No.

Mrs. MALONEY. I would like to ask again, all four of you, do you believe that he tried to seek any favors for China? Are you aware of any favors that he tried to seek for China?

Ms. SCOTT. No.

Ms. KHARE. No.

Ms. CRAWFORD. No.

Ms. HERNREICH. No.

Mrs. MALONEY. To your knowledge, did Johnny Chung ever try to seek any policy changes? Did he ever try to advocate policy, to your knowledge, in front of you, in any way?

Ms. HERNREICH. No.

Ms. CRAWFORD. No.

Ms. SCOTT. No.

Ms. KHARE. No.

Mrs. MALONEY. To your knowledge, were any policy changes ever enacted as a result of a Johnny Chung's visits to the White House or for his contributions? Are you aware of any policy changes that were enacted?

Ms. HERNREICH. No.

Ms. KHARE. No.

Ms. CRAWFORD. No.

Ms. SCOTT. No.

Mrs. MALONEY. Do you think that it is unusual for Johnny Chung to seek to have his picture taken with the President or the First Lady? Is that an unusual thing?

Ms. HERNREICH. No, it's not unusual.

Mrs. MALONEY. And do you believe that Johnny Chung was unique in trying to obtain a photograph?

Ms. HERNREICH. No, I don't think there's anything unique about that.

Mrs. MALONEY. What is it like when people come to the office? Do they usually want their photograph taken with the President and First Lady?

Ms. HERNREICH. Absolutely.

Mrs. MALONEY. And do you think that it's unusual for a businessman or woman to display a photograph that was taken with him or her, with the President or First Lady? Is that unusual?

Ms. HERNREICH. No, it's not unusual.

Mrs. MALONEY. I would like to really ask the President's scheduler, Ms. Hernreich, a few questions.

How many people typically attend the President's weekly radio broadcast?

Ms. HERNREICH. Anywhere between 40 and 100. Approximately 60 for each radio address.

Mrs. MALONEY. And is everyone who attends someone who gave a donation to the Democratic National Committee?

Ms. HERNREICH. Well, No. 1, one certainly doesn't know about those people. It has no correlation to their being at the radio address. So I wouldn't know that one way or the other.

Mrs. MALONEY. Describe some of the people who have come to these radio addresses besides Johnny Chung.

Ms. HERNREICH. You would normally——

Mrs. MALONEY. Mr. Fattah said he went. Did Members of Congress go?

Ms. HERNREICH. Members of Congress. The President's friends from high school or college, when they come to Washington, will come to radio addresses. His friends from Arkansas. We have staff people and family.

Mrs. MALONEY. What about school children? Do school children come?

Ms. HERNREICH. School children often come. If we have a theme radio address, we'll have a group that—for instance, if we had a radio address on mammography, we would have breast cancer survivors there. We had radio addresses on tobacco, and so we would have a group of school children come who had started an initiative to keep other kids from ever starting smoking.

We've had absolutely variety. We have——

Mrs. MALONEY. So a cross-section of America?

Ms. HERNREICH. We have Make-A-Wish children come. We have the president of the national Rotary Clubs come. We have all kinds of people come.

Mrs. MALONEY. Actually, maybe I would like to come one of these days.

Ms. HERNREICH. We would love to have you. I hope you will.

Mrs. MALONEY. I would really like to ask a judgment question of you. You mentioned earlier that you're not aware if any of these school children or Congress Members or friends from home make contributions to the President's re-election campaign or to the DNC or to a Congressperson.

But in your judgment, do you think it would be right to deny a person the access to go and listen to a radio address if they had given a contribution? I was always taught that it—to be civic, to participate in your Government. But do you think it would be right to deny someone access because they have made a contribution?

Ms. HERNREICH. I don't think it's right to deny somebody because of they've made a contribution.

Mr. WAXMAN. Will you yield? Have you ever heard of anybody being denied access because they gave $50,000 to the Democratic National Committee?

Ms. HERNREICH. No, I haven't. Or the reverse.

Mrs. MALONEY. I would like to ask Carol, the DNC worker, the former assistant, I would like to ask you, why were you concerned about releasing the photographs of the President with the Chinese businessmen that Johnny Chung brought to the radio address? Why were you concerned about that?

Ms. KHARE. I was not really concerned about it, because we didn't have the photographs. The White House did. I did hear—I did learn that there was some concern at the White House about releasing them. And I heard that the National Security Council had those concerns. I didn't—and that was—when I heard that they were concerned, that was the first I knew that there was anything questionable about it.

Mrs. MALONEY. And would you have arranged for Mr. Chung to attend the radio broadcast if you had known that he was going to bring other businessmen with him?

Ms. KHARE. Well, I knew that he had businessmen with him, because he asked when he called. He said, I'm at the First Lady's office, we've been in with the First Lady; I have these businessmen with me, and we would like to go to the radio broadcast.

Mrs. MALONEY. Well, to your knowledge, is there anything illegal or unethical about bringing businessmen to a radio broadcast?

Ms. KHARE. No.

Mrs. MALONEY. To your knowledge, at the same time Mr. Chung made donations to the DNC, do you have any reason to believe those donations were improper?

Ms. KHARE. No. I have no reason to think that.

Mrs. MALONEY. And was Mr. Chung an American citizen at the time that he made these donations?

Ms. KHARE. I believe that he was.

Mrs. MALONEY. He was an American citizen. And is there any reason to believe that he was not the source of the contributions,

that he—was there any reason to believe that the contributions came from any place besides Mr. Chung?

Ms. KHARE. I certainly had no reason to believe that.

Mrs. MALONEY. Did you know that when Mr. Chung came to these—to this meeting, that he had been just named California's Entrepreneur of the Year for his business activities? Did you know that?

Ms. KHARE. No, I really—that's the first I've heard of that.

Mrs. MALONEY. Didn't know that. My time is up. And I look forward to asking some more questions the next round.

Mr. BURTON. The gentlelady's time has expired.

Ms. Hernreich, you said, I believe, that one of you indicated that anyone coming—I think it was you, Ms. Crawford—anyone coming into the White House had to have security clearance, or else they couldn't get in obviously to protect the President against something; is that correct?

Ms. CRAWFORD. The Secret Service handles the security.

Mr. BURTON. That's for everybody?

Ms. CRAWFORD. Yes. You have to clear someone into the White House if you're not a White House passholder.

Mr. BURTON. So the people that Johnny Chung brought in did have clearance, or else they wouldn't have been involved in the radio broadcast that day?

Ms. CRAWFORD. I assume so.

Mr. BURTON. Is that right, Ms. Hernreich?

Ms. HERNREICH. I would assume so, too. You send the list with information to the Secret Service, and they make a determination about who's allowed onto the White House grounds to see the President.

Mr. BURTON. OK. You said you didn't remember Johnny Chung being there and you didn't know the people who were with him?

Ms. HERNREICH. I have no recollection of that particular radio address or being there in the room when he was there.

Mr. BURTON. But the President said to you afterwards, those people shouldn't have been here?

Ms. HERNREICH. Yes.

Mr. BURTON. That seems kind of strange to me that you don't remember Johnny Chung being there, and you don't remember those people being there—and you don't remember those people being there, but you remember the President saying, those people shouldn't have been here.

Ms. HERNREICH. Well, I don't deny that they were there. I certainly—you know, because everything indicates that they were there. I just don't have any recollection of the particular radio address and, you know, everything surrounding, being in the room. Often I don't stay in the room. Sometimes I do; sometimes I don't. My office is right outside of the Oval Office. And often I will stay out in the outer office during the radio address and let the staff handle the radio address.

Mr. BURTON. I know. But you said you didn't remember Johnny Chung being there.

Ms. HERNREICH. No, what I meant to say, Mr. Chairman, is I was not in the room and don't remember, you know, everything that went on there. I guess what I'm trying to say is, I certainly—

from every indication, Mr. Chung was there. I just don't remember, I cannot visualize the events that went on that day or remember everything that sort of transpired——

Mr. BURTON. And you——

Ms. HERNREICH [continuing]. In the room that day.

Mr. BURTON. And you don't remember the people that were there either?

Ms. HERNREICH. I don't have—other than, you know, having seen——

Mr. BURTON. Well, the reason that troubles me is, I'm thinking to myself now, because we have people running in and out all the time as well. And sometimes I get a little upset. And I look at my secretary and say, why did you bring these people in here—for instance, when we have a bill up, and people are in there beating on us, we don't want to talk to certain people—and say, why did you bring these people in? And usually when I say that, I'm not angry, but she gets the message pretty easily and pretty quickly, and it makes a very vivid impression on her.

And I can't understand you being as close to the President as you are and working with him as long as you have and knowing him as well as you do, that you wouldn't remember these people and remember this incident, because obviously he says, hey, these people shouldn't have been in there.

Ms. HERNREICH. That's what I remember, what the President said to me.

Mr. BURTON. But you don't——

Ms. HERNREICH. That makes a very vivid impression upon me. But, no, I do not remember—again, everything indicates they were there.

What I'm saying is, there's no denial that they were there. I just cannot tell you anything that transpired in the room. I have no visualization of what went on that day. And my recollection, although it could have happened in the Oval Office, that the President stepped out into the outer office when he said that to me after the radio address. It could have occurred in the Oval Office. But that's my recollection.

But what I do remember, Mr. Chairman, is that he said that to me. And as you said, your assistant would remember something like that. That's—that's the part that I remember. We have had 15——

Mr. BURTON. All right.

Ms. HERNREICH [continuing]. Thousand people probably go through there on radio addresses. It's impossible to remember everything—everybody that has gone through there. But I do remember that the President said that to me.

Mr. BURTON. I understand. But the pictures weren't sent?

Ms. HERNREICH. That's my recollection, Mr. Chairman.

Mr. BURTON. Why? I mean, you don't remember the people. You don't remember Johnny Chung being there. You do remember the President admonishing you that they shouldn't have been there.

Ms. HERNREICH. Correct.

Mr. BURTON. And then the pictures weren't sent. Why? Do you have any idea why the pictures were not sent, why he didn't want them sent?

Ms. HERNREICH. I don't think that's what the President said to me. He did not tell me not to send the photographs. He just said to me, we shouldn't have done that. That's my recollection, that there was nothing—he didn't say anything to me about photographs. And my recollection is that—that we did not send the photographs.

I didn't necessarily recall that that's what NSC said, because in the memo that we now see from Mr. Suettinger, he said it was OK to release the photographs, although I did not have that information at the time.

But if I made the decision not to send the photos, it was either because the NSC said it or because I thought, let's err on the side of caution here. And if there's any question about that whatsoever, let's not send the photographs out.

Mr. BURTON. Ms. Crawford, you know who Mr. Wiriadinata was, the gardener that gave $400,000 to the DNC?

Ms. CRAWFORD. No. I—that name I can't recall.

Mr. BURTON. Were you in the room when he was there; do you recall?

Ms. CRAWFORD. I do not know.

Mr. BURTON. You said you were in the room most of the time when these people came in after a radio broadcast.

Ms. CRAWFORD. And did this gentleman attend the radio address; is that——

Mr. BURTON. He was just there for a picture. OK. Never mind.

Could we play this tape of Richard Sullivan, please? Could you put that on?

[Videotape played.]

Mr. BURTON. Ms. Scott, I know my time has expired, but I would like to ask you, was there any discussion about this with the staff and the people at the Democratic National Committee?

Ms. SCOTT. On what day?

Mr. BURTON. About the concerns that he expressed there about Mr. Chung.

Ms. SCOTT. I'm not understanding your question.

Mr. BURTON. You heard what he just said there.

Ms. SCOTT. Right.

Mr. BURTON. Was there any discussion about Johnny Chung, about what—about this particular issue, about whether or not people over there were concerned about getting contributions from him because of—because of his background and because of his hustler image?

Ms. SCOTT. No.

Mr. BURTON. There was no discussion whatsoever?

Ms. SCOTT. No.

Mr. BURTON. So the only person was Mr. Sullivan that had that concern?

Ms. SCOTT. I can't speak on behalf of Mr. Sullivan.

Mr. BURTON. I see.

Who seeks time on your side?

Mr. WAXMAN. I'll reserve my time——

Mr. FATTAH. I'll seek time.

Mr. WAXMAN [continuing]. And pass at that point.

Mr. FATTAH. I'll seek time.

Mr. BURTON. Mr. Cummings.

Mr. FATTAH. No, Fattah.

Mr. BURTON. Oh, that's right. You were in the 30 minutes. Mr. Fattah.

Mr. FATTAH. Yes. Thank you, Mr. Chairman.

Let me just walk back through this, Ms. Hernreich. You're in charge of a major operation that has to do with access to the President, him getting his work done——

Ms. HERNREICH. That's correct.

Mr. FATTAH [continuing]. On behalf of the country. And you have a number of employees who work for you?

Ms. HERNREICH. That's right.

Mr. FATTAH. So when the President is doing something that's on his schedule, more likely than not, you're thinking about the next thing and the next thing and the next thing that's on the schedule.

Ms. HERNREICH. Usually I have other work to do.

Mr. FATTAH. OK. So radio addresses are regular events that take place?

Ms. HERNREICH. That's correct.

Mr. FATTAH. And I hate to shatter the public image of this, but these are not extemporaneous comments by the President into a radio microphone, right?

Ms. HERNREICH. That's correct.

Mr. FATTAH. These remarks are prepared well in advance. There's a sense of what is going to happen. So, for you, there's not a lot of drama in a radio address.

Ms. HERNREICH. That's correct.

Mr. FATTAH. So the fact that you say, well, the President was having a radio address, and I was doing my other work, in the context of the world that you live in, it makes a lot of sense, right?

Ms. HERNREICH. Yes. I mean, again, that's as I recall it. You know, I could have been in the room; I just don't remember it. And I want to make that clear: There are times that I go into radio addresses, and there are times that I stay outside and do other work.

Mr. FATTAH. I just want to get a sense of this. You know the President was over on Capitol Hill the other day, and my staff was up looking out the windows and stuff. You see the President all the time, right?

Ms. HERNREICH. That's right.

Mr. FATTAH. So you're not going to be up because they say the President is walking by, you're not going to be jumping up to see the President of the United States. I mean, you're on the inside?

Ms. HERNREICH. Yeah, you're correct about that statement.

Mr. FATTAH. So the point that the chairman was making about your recollection about the radio event, there's no disagreement that these gentlemen came in with Johnny Chung into the radio address.

Ms. HERNREICH. That's correct.

Mr. WAXMAN. There are pictures of it, in fact?

Ms. HERNREICH. That's correct.

Mr. FATTAH. There's videotape of it?

Ms. HERNREICH. That's correct.

Mr. FATTAH. And they were put on a list by Ms. Crawford, who works under you; is that correct?

Ms. HERNREICH. That's correct.

Mr. FATTAH. And that list was eventually run by you before the radio address took place?

Ms. HERNREICH. Well, I assume so. I am not absolutely certain of that, but I assume so.

Mr. FATTAH. But it would normally have been?

Ms. HERNREICH. That's correct.

Mr. FATTAH. OK. So there's no mystery surrounding this event whatsoever?

Ms. HERNREICH. That's right.

Mr. FATTAH. Now, there's a mystery—at least on my part, not on your part—as to why the committee is so focused on this matter. Because again there's no information whatsoever that these people's appearance at the radio address in any way, shape, or form has anything to do with foreign contributions, illegal contributions into the 1996 elections.

Now, there was testimony under oath by Haley Barbour in the Senate that he traveled to Hong Kong—he was on a yacht there; he requested $2 million—that he got those dollars. He put it into the national policy forum which he was the chairman of while he was the chairman of the RNC. In fact, when the policy forum was created, the paperwork chart showed that as a subsidiary of the RNC. And they spelled out in the paperwork that they were creating this 501(c)(3) so that they could take foreign money.

So then he set up an entity to take foreign money. He went to a foreign land, received a couple million dollars in foreign dollars. That went into the election of Republicans to the U.S. Congress. In fact, it was requested specifically to go into some 60 targeted races.

And then the gentleman who helped facilitate this money asked him not for a letter like the letter that Don Fowler wrote for Johnny Chung; he asked him to travel to China with him. The chairman of the Republican National Committee got up, took his United States passport and went off to China.

So if we're looking for foreign money in an election, there's some reason to believe that if we could stop majoring the minors, we might be able to actually get some people in front of us who could talk to us about foreign money coming into an election. Because there is evidence, at least on the record in the Senate, under oath, that these are the facts.

And we could ask the people involved in this as to why it was that they sought to have foreign money influence the outcome of the elections—Federal elections in the—and so, Mr. Chairman, I would just hope as we go forward that since these people have given us all the information, I think, that they have at their disposal, that we would find some time on the committee's schedule when we could bring in those who have been involved in these activities, because I know, since we have been so enthusiastic in our search for illegality, that this committee would not want to miss the opportunity to scrutinize these opportunities.

I will yield back.

Mr. WAXMAN. Will the gentleman yield?

Mr. FATTAH. I will yield to Congressman Waxman.

Mr. WAXMAN. And if we really want to look at the influence of foreign money, we ought to look at the money that's gone to Mem-

bers of Congress. Because one of the things that we learned, just from reading the press reports about what was made, the to-do that was made about the Chinese Government maybe doing something, they were looking at Congress. They were trying to influence the Congress of the United States. And we've got a lot of other reports of Members of Congress that have been influenced with foreign money or by supporters of foreign policy issues.

If we want to look at that question, let's look at it across the board, not just at the President, not just at the Democrats, but some of the Republicans as well.

I thank you for yielding to me.

Mr. FATTAH. I yield back the balance of my time.

Mr. BURTON. The gentleman yields back the balance of his time.

We intend to have hearings on the question of foreign money. We will do that at some point in the future.

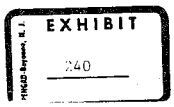
Mr. Horn.

Mr. HORN. Thank you very much, Mr. Chairman. I'm going to be using exhibits 196, 198, and 240. And my question is addressed to Ms. Crawford who, I believe at the time we're discussing, which is April 7, 1995, you were Deputy—or you were former Staff Assistant to Nancy Hernreich at the White House; is that not correct?

[Note.—Exhibits 196 and 198 may be found on pp. 715 and 717.]

[Exhibit 240 follows:]

Mr. Sun Jianfeng (the young entreprenueur from Xinjiang) accompanied by
Mr. Johnny Chung of AISI with President Clinton at the Oval Office
在本公司紐約辦事處陪同下來自中國新疆之友人、
青年企業家孫劍峰蒙接見於白宮橢圓型辦公室



Ms. CRAWFORD. That's correct.

Mr. HORN. What I'm curious—if you remember, looking at exhibit 196, did you happen to call up Melanie Darby on the NSC staff to give her information on the delegation from China that was coming?

Ms. CRAWFORD. I don't recall specifically calling Ms. Darby about this. But she would have been the appropriate person. She worked in the National Security Council for Nancy Soderberg who this list had gone to on the 13th. And she was—would have been sort of my counterpart. So it would not have been unusual for me to contact her and followup on these.

Mr. HORN. Well, what I'm looking at here is April 7, 1995, 10:12 a.m., Melanie Darby sends this e-mail, electronic mail, to Robert L. Suettinger. Now, here's what it says:

> An odd situation in which I need some guidance for the President's office as soon as possible.
>
> A couple of weeks ago, late Friday night, the head of the Democratic National Committee asked the President's office to include several people in the President's Saturday radio address. They did so and not knowing anything about them except that they were Democratic National Committee contributors.
>
> It turns out they are various Chinese gurus, and the President of the United States wasn't sure we would want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow, and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list as soon as possible and give me your advice on whether we want these photos floating around. For your information, these people are major Democratic National Committee contributors. And if we can give them the photos, the President's office would like to do so.

Now, the major Democratic National Committee contributors are the chairman, China Council for the Promotion of International Trade; chairman, China Commerce of International Commerce; the president, China Petrochemical Corp.; the vice president, China International Trust and Investment Corp.; the vice chairman and president of Shanghai A.J. Share Holding Corp.; then James J. Sun is the young entrepreneur in this Chinese city, self-made multimillionaire; and then the chief of the American Oceanic Affairs Division Liaison Department and so forth; and Johnny Chung, chairman and CEO of his own firm.

Now, I take it most of the people on this list are aliens, are not U.S. citizens. And yet, they're noted here as major Democratic National Committee contributors. And that, he is taking, I assume here, or rather Ms. Melanie Darby is taking this as background that probably someone from the President's office, either you or Mrs. Nancy Hernreich are the ones. And I assume perhaps Mr. Sullivan gave it to you. Or whoever it is that gave the information from the Democratic National Committee. Am I wrong on these assumptions? It seems to me that here we have evidence that aliens are contributing to the Democratic National Committee, foreigners, not citizens of the United States.

Ms. CRAWFORD. I don't recall a specific conversation with Brooke Darby and what I may have or may not have told her.

Mr. HORN. Well, you work for Nancy Hernreich. Did you, Ms. Hernreich, call Melanie Darby and give her the background and ask for some advice and information?

Ms. HERNREICH. I have no recollection of calling Brooke Darby—she's called Brooke by the way—about this. But I think in the

other, and I can't remember what number it was, what it appears that I did was, shortly after the radio address, wrote a note on the list of the people who attended that radio address to Nancy Soderberg who is, who Melanie B. Darby works for. And that seems to have been, and that one indicates on there that the someone from the DNC asked us to let them into the radio address.

She may have meant—decided from that note, to then phrase this—this e-mail in this way. I don't know. I don't recall ever having a conversation with her about this. And, in fact, I probably would not have had a conversation with her. What I did was send the note, and you all can read what I put on the note. And it doesn't say that I thought that these people were DNC contributors.

Mr. HORN. Earlier, the chairman asked certain questions about how one is cleared into the White House.

Ms. HERNREICH. Yes.

Mr. HORN. I gather, when you have somebody that you've arranged or somebody wishes you to arrange a meeting with the President, just if it's sitting in the radio show, having pictures, photos, whatever, that you make a call to the Secret Service, I assume, give him the list of people. And do they have to do more than that? Do they need, if they are American citizens, the Social Security number? Or what? How do you do it with foreign nationals?

Ms. HERNREICH. We have a new procedure that we have put into place now.

Mr. HORN. Since this time?

Ms. HERNREICH. Yes, since this time.

Mr. HORN. What was it then?

Ms. HERNREICH. I don't know what it was then. I think what we did then, which was probably give, if they weren't American citizens, give passport numbers and names. We would send those to the Secret Service. And then they make a determination if they, if the person can come into the White House.

Mr. HORN. I would like to ask the chairman and the general counsel for us, chief counsel, do we have those records from the Secret Service as to who came in and how they were admitted?

Mr. BENNETT. We do not have all those records, Congressman. We're in the process of talking to Mr. Ruff's office about many records at the White House. And Mr. Ruff is seeking to be cooperative, but we do not have all those records, no.

Mr. BURTON. But we will check into it.

Mr. HORN. All right. This electronic mail, as I said, was April 7, 1995, 10:12 a.m. to Robert L. Suettinger. Now, here's his reply, since it was urgent that they wanted information, 1 hour 12 minutes later, sent at 11:24 a.m., April 7, 1995.

And he says the following to Melanie Darby: "The joys of balancing foreign policy considerations against domestic politics. I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the Democratic National Committee, who am I to complain? Neither do I see any unalloyed benefit either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide, present or former, Chinese officials with the possible exception of James Y. Sun, 'young entrepreneur and self-

made millionaire'" with quotes around it. "Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

"But a caution, a warning of futures déjà vu. Having recently counseled a young intern from the First Lady's office who had been offered a, quote, 'dream job,' unquote, by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler and appears to be involved in setting up some kind of consulting operation who will thrive by bringing Chinese entrepreneurs into town for exposure to high level U.S. officials.

"My concern is that he will continue to make efforts to bring his friends, in quotes, into contact with the President of the United States and the First Lady of the United States to show one and all he's a big shot, thereby enhancing his business.

"I would venture a guess that not all of his business ventures or those of his clients would be the ones the President would support. I also predict that he will become a royal pain because he will expect to get similar treatment for future visits. He will be persistent. Signed Bob." And this Bob, I don't know, is not related to CIA Bob we hear about.

Mr. BURTON. The gentleman's time has expired.

Mr. HORN. But this is Bob Suettinger otherwise known as Robert Suettinger.

Mr. BURTON. The gentleman's time has expired.

Mr. Cummings.

Mr. CUMMINGS. Mr. Chairman, I was very pleased to hear you saying that we are going to be looking beyond where we've looked, because certainly, as Mr. Fattah and Mr. Waxman have said, we definitely need to look at the Congress of the United States of America. And we also need to look at both parties and I'm glad to hear that. And certainly we will hold you to that.

I just want to cite something that I find very interesting, as we go down this road of leading to nowhere. By the way, the New York Times on January 27th has a very interesting article, 1997. It says $250,000 buys donors best access to Congress.

It says, for elite donors who contributed at least $250,000, the Republican party offered a new enticement in it's gilded invitations to the party's convention in San Diego last summer. Beyond the smorgasbord of perks like access to the party's private sky box and a photo session with Republican nominees, the party promised special benefit, staff members to help with the problems in Washington.

In fund-raising circles, these $250,000 donors, and I emphasize $250,000 donors, became known as season ticket holders. At least 75 corporations and individuals gave $250,000 or more to the Republican party last year setting a new standard for political giving that by far surpasses previous election years when top donors generally gave $100,000 to join the Team 100 Club.

According to solicitation letters, invitations and interviews with dozens of Republican fund-raisers, the Republicans have focused on large corporations and individuals with interests pending on Capitol Hill. Quote, "there is no question, if you give a lot of money, you will get a lot of access, said a senior executive whose corpora-

tion gave $500,000 to the Republicans. All you have to do is send in the check."

The $250,000 season ticket was pitched as an entre to the party's inner circle and the best access to Congress. And that's quote. He said, adding, it is literally touted as being in the inner sanctum and the creme de la creme.

Most fund-raisers and donors spoke on the condition of anonymity. And he went on to say, I think it is fair to say that everyone in our organization from the CEO down finds this atmosphere to be corrosive and unproductive, said an executive whose corporation donated more than $300,000. Quote, you play because your competitors play. At least from our perspective, we would much rather take a number at the door of a Congress person's office, sit down like any other citizen, and when our number is called, go in, state our case, and then leave. I thought that this is what the Constitution says how it should be, end of quote.

That article and those quotes call out for us, Mr. Chairman, to look at this entire process. And I'm just curious, to these ladies that are sitting in front of you, do all of you have lawyers?

Ms. HERNREICH. Do all of—I'm sorry, what did you say?

Mr. CUMMINGS. Do all of you have lawyers representing you?

Ms. KHARE. Yes.

Ms. HERNREICH. Yes.

Mr. CUMMINGS. And it's interesting, Mr. Chairman, when I heard the figures that were paid by Maggie Williams to defend herself in coming from Paris, and I'm sure these ladies, had to find money, and take time to do this. The question then becomes what is our aim? Where are we going?

As I've said many times before, I think the American people basically want to see their tax dollars spent in a cost-efficient and effective manner. That's all they want. And we seem like we're on our road down this Alice in Wonderland situation where we're trying to present something. But it reminds me of a few years ago when I was a child when HUD had a commercial, and the commercial was about home buying and basically telling the people to be careful when they go out to buy a house. So they had this big wonderful front. I'll never forget it. I was 6 or 7 years old. Big, big front. And the person goes and opens the door, and there's nothing behind it.

And so this whole episode reminds me of that. And I think that it's important that the American people understand where we're going. The Senate did their hearings. Senator Fred Thompson, in all due respect, came out with all of these allegations from the very beginning. And when the door was opened, even he had to admit that there was nothing behind it.

And here we are again spending taxpayers' money, taxpayers that are looking at this right now trying to figure out how they're going to get their kids through college, trying to figure out how they're going to have food on the table, trying to figure out how they're going to pay the taxes that are going to come due very shortly, but at the same time, they watch their Government bring in these wonderful ladies with their lawyers sitting right behind them and watch their Congress people that are paid $130 some

thousand a year, sit here and go down this Alice-in-Wonderland situation.

They, too, are sitting wondering when the doors open and there is nothing behind it, nothing, they ask themselves a question, and they must become quite cynical as to where—what we are doing.

And so I would hope, Mr. Chairman, that we would move on to the things that are very important; that we look at Congress. I think that should be very, very interesting. And perhaps, when we open the door, we will see something behind it, because maybe there is. Thank you very much.

Mr. BURTON. The gentleman yields back the balance of his time.

Mr. CUMMINGS. Yes.

Mr. BURTON. Mr. Mica.

Mr. MICA. Thank you, Mr. Chairman. We are getting toward the end, ladies, and I appreciate your patience, and I think you know why we're here. We're here because the very top assistant to the First Lady, close to the President, accepted a check. She admits she accepted a check on Government property for $50,000.

The committee doesn't know the source of that money, but we know that substantial foreign money was sent to the account of Mr. Chung. We know that on March 9th he passed that check to Ms. Williams, who came before you, for $50,000. We know that on March—that is March 9th—on March 10th that one or two of you were calling to get him and his Chinese delegation in to a meeting then with the President. On the 9th, I guess—or the 10th he had his picture taken with the First Lady and used the White House Mess at the direction of the First Lady's office. And on the 11th he did appear with the President, and the President you have testified, is upset about it.

We are a little bit concerned that we don't know where that money came from. We're a little bit concerned that, Ms. Scott, you told the committee that you think that you spoke to Ms. Williams about the request to get these folks in.

Did you speak to Ms. Williams or someone in the First Lady's office; is that correct?

Ms. SCOTT. I said that I think that I spoke to someone in the First Lady's office. I did not specifically say Ms. Williams.

Mr. MICA. Well, again, we're trying to sort out where these directives came from, where this money came from, and we hope to get to the bottom of it by talking to Mr. Chung and see how, in a matter of a couple of days here, by giving $50,000 he not only spent time with the First Lady, but also ended up with the President of the United States, with four foreign nationals at a radio address.

Some of it seems very coincidental. And then if we look at other transactions that are made here, $125,000 April 8th, and other contacts that were made; and we also have, if you go back to March 13th, I think this—are you left-handed——

Ms. HERNREICH. No.

Mr. MICA. Who is left?

Ms. CRAWFORD. Well, I'm left-handed.

Mr. MICA. You are left-handed?

Ms. HERNREICH. That is my handwriting.

Mr. MICA. Is that your handwriting?

Ms. HERNREICH. It is my handwriting and I'm right-handed.

Ms. HERNREICH. There is a left-hand check here.

Ms. CRAWFORD. That may have been mine.

Mr. MICA. Well, someone knew, and it is marked here 3/13. So we have the 9th the money is given, the 10th we see action requesting this, and on the 13th already the photos. And no one remembers the photos, even though we have testimony or deposition by Ms. Ratliffe, who says she picked them up from Ms. Crawford. And we have questions raised about who these dudes are and what they are doing.

So it does raise some questions about a trail of foreign money, about national security, about access to the President, about receiving money on Federal property. And we are just trying to get to the bottom of what, in fact, has gone on here, and we will continue to pursue it.

It does cost money. In some countries they don't spend the money. It's all swept under the table. No one knows what took place. But the American people have a right to know and we have an obligation to find that information out from our witnesses.

I want to thank the chairman——

Mr. BURTON. Would the gentleman yield?

Mr. MICA [continuing]. For holding the meeting and yield back my——

Mr. BURTON. Would the gentleman yield before he yields back his time?

Mr. MICA. Yes. Yes.

Mr. BURTON. I'd like for exhibit 191 to be put up on the screen. Can you bring that in a little bit closer?

Ms. Scott, you indicated a while ago that there was not a lot of discussion over at the Democrat National Committee about Johnny Chung. If you read this it says, Ceandra Scott called. She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the radio address. Apparently they were in Maggie's office when the request came and Maggie said she didn't know, but to contact the DNC.

It seems strange to me that there was not any discussion over there, like you said. You said there wasn't much concern about Mr. Chung, and yet you called Maggie's office and said that that should have been cleared prior to them coming over there. Why were you concerned and why does this memo say that?

[Exhibit 191 follows:]

MEMORANDUM

FROM: Betty Currie

DATE: March 28, 1995

Jon

2. Ceandra Scott called - She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the Radio Address. Apparently they were in Maggie's office when request came and Maggie said she didn't know, but to contact DNC --- I

NON-RESPONSIVE
MATERIAL
REDACTED

EOP 000823

Ms. SCOTT. The memo is addressed to Betty Currie, who is in the Oval Office.

Mr. BURTON. Yes.

Ms. SCOTT. What happened was after the radio address, I made a call in to Ms. Currie, who was not there, and spoke to someone else, I'm not sure who that person was, and they raised concern about Mr. Chung being at the radio address with those guests.

Mr. BURTON. So there was some concern at the DNC among the staff about Johnny Chung.

Ms. SCOTT. I didn't say the DNC, I said I called over to the White House.

Mr. BURTON. I know, but you were at the DNC.

Ms. SCOTT. Correct.

Mr. BURTON. That's what I'm saying. There was concern about him over there.

Ms. SCOTT. I'm unclear as to what your real question is, Mr. Chairman.

Mr. BURTON. You made this call.

Ms. SCOTT. I didn't make the call regarding Johnny Chung. I just made an unspecific unrelated call to Ms. Currie. Someone answered the phone. It was a female. I'm not sure who she was, but stated that there was some concern about the guests of Mr. Chung at the radio address.

Mr. BURTON. If you read the note there, it says Ceandra Scott called. She was concerned about Johnny Chung.

And when we asked the question a while ago, you indicated there was no discussion or concern about Johnny Chung over at the DNC.

Mr. BEST. Well, Mr. Chairman, the real question for the witness is does this refresh her recollection of such a conversation, because this is not her memorandum.

Mr. BURTON. I understand it is not her memorandum, but Ms. Currie indicated that this was a concern that Ms. Scott had when she called over there. That's why I'm asking the question. Does this stimulate any recollection on your part?

Ms. SCOTT. Yes, it does.

Mr. BURTON. It does. So there was concern at the DNC about Johnny Chung?

Ms. SCOTT. I can't say the DNC. I said what happened was I called over to Betty Currie after the radio address. She was not in. Someone answered the phone and said there was concern about Mr. Chung and his guests at the radio address.

I then put in a second call to Betty Currie to try to get her once I found out, which I never made any contact with Ms. Currie. So that's what this is about.

Mr. BURTON. So then the word "she" does not refer to you; is that what you are saying?

Ms. SCOTT. I didn't write it, so I'm unclear as to what the "she" is.

Mr. BURTON. OK, thank you. Do we have any more—Mr. Barr.

Mr. BARR. Thank you, Mr. Chairman. Could we have exhibit 201 up? Ms. Khare, do you know the date of that? There is no date on it. It's a fax from you to Johnny Chung about the photos.

[Note.—Exhibit 201 may be found on p. 55.]

Ms. KHARE. Apparently it was faxed on April 11, 1995, from the fax line at the top, but——

Mr. BARR. That would be consistent with an earlier phone message, I think, that we have seen.

Ms. KHARE. I don't know about a phone message.

Mr. BARR. Could we have exhibit 195? Now, that's dated 3/11. A date of 4/7.

[Exhibit 195 follows:]

To: Marne

Date: 4/7 Time: 12:40

WHILE YOU WERE OUT

M. [illegible] (Gateway)

of (AISI) [illegible]

Phone 310-328-3883

Area Code Number Extension

TELEPHONED		PLEASE CALL	✓
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	

RETURNED YOUR CALL

Message: Date of Photo

3/11/95

EB

Operator

AMPAD EFFICIENCY® 23-023 CARBONLESS

EXHIBIT 195

EOP 059029

Ms. KHARE. This phone message—I didn't write this phone message and it's not to me. I don't know what that is.

Mr. BARR. I wasn't saying that you did. I'm just trying to come up with a time line.

Could we have exhibit 215, please? This document says, as of 11/22/95, per Bob McNeely, he will not honor request from Johnny Chung, CEO of AISI. He has been improperly using photo of businesspeople and the President.

Do any of you have any knowledge of that?

[Note.—Exhibit 215 may be found on p. 721.]

Ms. KHARE. No, I don't.

Mr. BARR. That would seem to indicate that the photos did go out, though; would it not?

Ms. HERNREICH. Yeah, again, all I can say is my recollection of this is that he asked for photos and that we did not send the ones of the group with him. If he obtained them through some other office or some other way, I don't know.

You know, I think what's possible, that could have happened, is that the photo of him and his brother could have been released but of the large group wasn't. I don't know for sure. And my memory can be incorrect on this, but my memory is that we did not send the photos out.

But there are other ways for them to get the photos. Anybody can order photos, but that was my recollection. And it could have been another, not the photos of the group, it could have been just of him and his brother.

Mr. BARR. On exhibit 198, down at the bottom, it talks again about the photos, way down at the bottom there. And the last sentence there, the parenthetical, the President's office would like to do so, talking about giving them the photos.

Who does that refer to? Who would be representing the President's office in that context?

[Note.—Exhibit 198 may be found on p. 717.]

Ms. CRAWFORD. I mean, I dealt with photographs in the President's office, but I don't recall a specific conversation with Brooke, or I don't know why I would have any stake in whether or not Mr. Chung got his photographs or not.

Mr. BARR. Well, one would presume that Darby Brooke would not just make that up. I mean, that wouldn't be a fair presumption, would it; that she just made up——

Ms. CRAWFORD. I assume that she did not make that up.

Mr. BARR. Right, I would presume that, too. But none of you all, in searching your memory and your vast knowledge of how things work at the White House can think of anywhere that would have come from, that the President's office would like the photos to come out?

Ms. CRAWFORD. The only thing that I can come up with is that Mr. Chung was persistent about wanting the photographs, but I don't think——

Mr. BARR. Yes, but he doesn't speak for the President's office, does he; Mr. Chung?

Ms. CRAWFORD. No.

Mr. BARR. I wouldn't think so. Somebody must have been speaking for the President's office to cause Darby Brooke to make a very

specific reference to the President's office wanting the photos to go out. Would that be a fair assumption?

Ms. CRAWFORD. I don't know what Ms. Darby, you know, why she would have written this. I can't speculate.

Mr. BARR. Well, you could. If you are not speculating, that's different from saying you can't speculate. I mean all I'm trying to do——

Ms. CRAWFORD. Would you like me to speculate?

Mr. BARR. There seems to be some confusion here, and nobody wants to own up to anybody wanting the photos to go out. There seems to be a clear indication here that somebody over at the White House did, and I'm just curious as to who at the White House did want the photos to go out or whether Darby Brooke just sort of made that up.

Ms. HERNREICH. Congressman, I think that the chairman, or someone has indicated that you will have these people tomorrow and maybe they can answer the questions and their memories might be better than ours on it, and certainly accept if they say they got it from us.

Mr. BARR. That would be nice.

Ms. HERNREICH. Yeah, it would be. I would like to know myself, really.

Mr. BARR. Thank you.

Mr. BURTON. Does the gentleman yield back the balance of his time?

Mr. BARR. Yes, sir.

Mr. BURTON. The gentleman yields back the balance of his time.

Mr. Barrett, we are only going to have two more people question, in all probability, if the gentleman has any more questions this evening.

OK. Mr. Cox.

Mr. COX. I thank the chairman. Ms. Hernreich.

Ms. HERNREICH. Yes.

Mr. COX. As the person responsible for Oval Office operations, you have some familiarity with what goes in and out of the President's office. Isn't that essentially the job?

Ms. HERNREICH. Yes.

Mr. COX. And that includes correspondence?

Ms. HERNREICH. Yes.

Mr. COX. Now, as I understand it, some of the correspondence that the President receives is separately answered because it's not of a business nature but of a personal nature; is that the way it works?

Ms. HERNREICH. Yes.

Mr. COX. And the category of whether correspondence is personal or not is dependent on what?

Ms. HERNREICH. Well, we have—at the beginning of the administration we sent out a letter to a group of friends and it gave them a private zip code. So, originally, all of the personal correspondence, where people who were writing in to that particular zip code—so that is how it started.

And then, as we were able to determine, as other people would write, the correspondence, the general correspondence department would then decide, pick those letters out and say, well, this sounds

very personal, send it over to the personal correspondence department. We would make a determination, yes, this is somebody the President knows personally and, yes, we should answer this. This is of a personal nature. So that is generally how that happens.

Mr. COX. And does the President see personal correspondence as it goes out?

Ms. HERNREICH. Not every single piece of it, but generally, yes.

Mr. COX. Because these are people that he personally wishes to keep up with?

Ms. HERNREICH. Yes. It's people that he will see often, and would—not often, but would see periodically, and it would be people that he would want to keep up with as well, but——

Mr. COX. Now, it's my understanding that in response to a question from the ranking member you have indicated that Johnny Chung, not for correspondence purposes, but just in the plain English sense, was a personal friend of the President's.

Ms. HERNREICH. What I said, I would correct it a little bit, I think the President considers a lot of people his friends, and he considers his supporters his friends. This is a man who loves people and he has literally, in my mind, millions of friends. And he honestly considers a very wide group of people his friends. So he considers Johnny Chung——

Mr. COX. All right. Now, the videotape that we saw of——

Ms. HEINRICH. Pardon me.

Mr. COX. The videotape we watched earlier of the Oval Office meeting with the Chinese guests that Johnny Chung brought in with him, the President sort of bear hugged Johnny Chung and was very happy to see him and greeted him by name and so on. And it is not in the sense that the President has millions of friends, but in the sense that he actually knew Johnny Chung that he is a personal friend; is that right?

Ms. HEINRICH. I assume so, yes. By the appearance of that videotape.

Mr. COX. Was Johnny Chung part of the group of correspondents who was treated as a personal correspondent?

Ms. HERNREICH. That was really initially a very small group. And Kelly and I put that list together in transition from a—and we had very little time to do it. So we used a very limited list to begin with. And there were people, just high school and college friends and that sort of thing. Because those were really the only ones that we had to deal with at the time. And we were in quite a hurry to let people know that they could, those people could contact the President.

Mr. COX. And is Johnny Chung in that group?

Ms. HERNREICH. He was not in that group of high school and college friends and Rhodes Scholar friends and that group that received that zip code. There were only a very small number who received the zip code.

Again, we had a limited number of time to go through the list. We had limited lists at our disposal to go through, and we were in a hurry to get that information out, so——

Mr. COX. The President himself occasionally gave people this zip code; right?

Ms. HERNREICH. I think he did, yes.

Mr. COX. So it wasn't just college friends and so on that had the zip code?

Ms. HERNREICH. Eventually, as I—it expanded. And again we received and would answer letters that came from correspondents that people, they were able to determine that would fall into that category as well.

Mr. COX. So you had to be an even better friend than Johnny Chung to get a zip code; is that it?

Ms. HERNREICH. I'm not sure that, again, that I ever had a list. The only reason that Johnny Chung didn't fall—the only list I think I really had at my disposal at that time were high school, college, Rhodes Scholar and some Arkansans. So I didn't have a wide variety of lists of everybody in the United States who was ever his friend to send to him to say mark the people you want me to send the zip code to.

Mr. COX. It was a discrete and limited list.

Ms. HERNREICH. Yes. It was primarily people, and that was it. I just didn't have those lists to send to him with every name of every person he had ever met.

Mr. COX. Did James Riady get a zip code?

Ms. HERNREICH. I don't know if James Riady got the zip code. I doubt it, initially, because he would not have been on an Arkansas list and he would not have been on any of those categories. But I can't say for sure.

Mr. COX. In your deposition you said you thought he did.

Ms. HERNREICH. Yeah, I don't know. Again, I just said—now I would say I doubt it, for that reason. I can go back and check and clarify it, but I can't do it in this very—at this time.

Mr. COX. OK. It would be informative to know whether in that inner circle of people if we included James Riady.

I yield back.

Mr. BURTON. Would you be willing to answer some questions that we would write to you and send to you?

Ms. HERNREICH. Regarding this?

Mr. BURTON. Regarding this.

Ms. HERNREICH. Yeah, I would be.

Mr. BURTON. We will send you some questions we would like to ask.

Do we have further——

Mr. WAXMAN. Just a quick question. If we asked you to take all the people the President has seen over the course of the year and rank them in the order how close a friend they were, do you think you would be able to do that for us?

Ms. HERNREICH. All of them that he sees in a year? No, I can't. Not like that.

Mr. WAXMAN. Obviously, I'm being facetious, because I just can't understand how at 5:20 in the afternoon this committee hearing, which has done nothing but turn over the same information that has already been made available, we are already down to a level of how close a friend Johnny Chung was.

Mr. BURTON. Henry.

Mr. WAXMAN. Mr. Chairman, I haven't had my 5 minutes, and I won't take it if you don't interrupt me.

Mr. BURTON. This is your first 5 minutes?

Mr. WAXMAN. My first 5 minutes.

Mr. BURTON. Well, give him the 5 minutes.

Mr. FATTAH. Will the gentleman yield for a second?

Mr. WAXMAN. Certainly.

Mr. FATTAH. I know we have the authority to ask for anything under the sun, but what the relevance is of asking her about the President's personal correspondence list, unless there is some evidence that someone has done something wrong, I think it's—you know, it just shows the stretch of this wide ranging investigation into nothing.

Now, if we want to investigate whether James Riady has done something improper, that seems entirely appropriate. But to know whether or not he is on a list seems to be a stretch, and I would just hope that the committee would try to confine itself to focusing in on what was the alleged challenge of the committee, which was to look at illegal foreign contributions and improper activities relative to the 1996 list. Who is on my personal correspondence list or the President's seems to be somewhat off point.

The last thing I want to say is that the Speaker of the House has said that President Clinton has a unique ability to make everyone feel as though they are someone that he is close to. It is an ability that I'm sure many politicians would hope that they could emulate.

Mr. WAXMAN. If the gentleman would permit, the Speaker even said that he melted in the presence of the President because he is so charismatic.

Mr. FATTAH. Indeed. In fact, part of the revolution against Newt Gingrich was that they thought he had went over to the White House and been corrupted by the charisma of Bill Clinton. So I think that——

Mr. WAXMAN. I think he could have gotten invited to a White House radio address or something.

Mr. FATTAH. Or something. So I think that we are far afield. And I think if we look at the questions that have been emulating from the majority side for this panel, just look at them, none of them have anything whatsoever to do with what we are supposed to be investigating.

So I just want to yield back my time, and I don't mean that as a personal criticism. I just think that it shows that the investigation of this committee has no focus in terms of its charge, and that is why the Thompson committee went out of business. So if we are going to have some reason to be here, we should at least have a focus of what we are trying to accomplish.

Mr. WAXMAN. It keeps us off the streets.

I am going to yield to Mr. Barrett, if he wants to take some of this time.

Mr. BARRETT. Thank you, Mr. Waxman. And I had the opportunity to watch your testimony in my office. I think you all did a very good job. I don't think it's necessary, really, to carry this on further.

But as I was sitting here I was thinking about, frankly, the President's ability to know people. And I recall when I was first elected in 1992, the same time he was, and then he came into the Democratic Caucus and was fielding questions. And he went

around the room and he knew everybody's name and the issues that were important to them. And I thought, man, he's not going to know who I am, I'm not going to raise my hand. But he knew everybody in the room, which I thought was just amazing.

And then in, it must have been 1994, I was out about 7 a.m. jogging one morning down the Mall, and who comes running toward me but the President with his little entourage of Secret Service agents. And he came over to me and said hi, Tom, how are you doing, and greeted me and asked me about a bill and how things were going. And we talked for about 35 or 40 seconds and then we both went our separate ways.

And even at 7 a.m., there were some tourists on the Mall, and as I was running, they were now looking at me because the President of the United States had just stopped to talk to me. So I turned to them and said, hey, who was that guy.

But my question, I guess for you, Ms. Hernreich, is are you as good as the President in remembering people and names?

Ms. HERNREICH. Not at all. I wish I was. He has a wonderful memory. And the thing about it is, this is a man who really cares about people. He loves people. And he considers many people his friends. And so I—you know, there's—I don't know, it seems to me that, honestly, and maybe I shouldn't editorialize here, but what difference that it makes who is on the personal correspondence list or who isn't, this is a man who loves people, considers everyone his friend, and would be happy to have everybody, you know, have his personal correspondence code and write him personal letters. He would love to sit and read every one of them and answer every one of them personally.

Mr. BARRETT. OK. Thank all four of you for your time today.

Mr. WAXMAN. Mr. Chairman, I yield back the balance of my time.

Mr. BURTON. Gentleman yields back the balance of his time. In conclusion, let me just say—did you have anything else you wanted to say? Mr. Cox.

Mr. COX. Well, yes, just because my time expired on the questions that I began, and I won't resume, but I think it is rather obvious that in response to my colleague's rhetorical question that James Riady is, in fact, at the center of an investigation into illegal foreign payments to the executive branch of our Government, and inquiring about the level of involvement of James Riady in the White House, all the way to the extent of having a special code that he can put on his mail so that it bypasses the staff, bypasses the correspondence office and goes directly to the President, I think is very much to the point.

Mr. BURTON. Well, let me conclude by saying that the reason the investigation continues is because millions of dollars of illegal contributions have been found and returned, No. 1.

No. 2, we have 66 or so people who have taken the fifth amendment or fled the country, and so we are having a difficult time getting this information. And until we get satisfactory answers, unfortunately very fine people like these ladies are going to be called up here to try to help us fit the pieces of the puzzle together.

I do appreciate, and I'm sure the committee appreciates your patience today, because we had so much that we had to cover and you had to sit there and wait for many hours. So we do appreciate that,

and we apologize for the amount of time you had to just sit there and cool your heels.

The committee, unless there is further business, will stand in recess until 12 noon tomorrow.

Mr. BARRETT. Mr. Chairman, just as an inquiry, can you give us a little preview of tomorrow, what you are planning?

Mr. BURTON. Tomorrow there will be a deposition which will take place starting at 9 a.m. of Mr. Huang—or Mr. Chung, pardon me. And, hopefully, that deposition will be concluded by 10:30 or 11 o'clock.

What we wanted to do was to start the hearing at noon, and I think we can stick pretty close to that schedule.

Mr. BARRETT. And where will that deposition be? Have we been informed of that?

Mr. BURTON. The deposition will be held at the—what room will we have that in?

Mr. BENNETT. Congressman, the deposition will be held here in the Rayburn Building, but I've talked to Mr. Ballen, minority counsel, and in terms of certain considerations of the witness, we are not really announcing at this point in time exactly what room the deposition will be in. All the members of the committee will be advised what room we are going to be in.

Mr. BARRETT. Prior to the start of that.

Mr. BENNETT. Yes, certainly.

Mr. BURTON. We will make sure you and any other Member who would like to participate in the deposition will be made aware of where it is. We just don't want a whole gaggle of people waiting outside.

Mr. BARRETT. I understand. Thank you very much.

Mr. BURTON. The committee stands in recess until tomorrow.

[Whereupon, at 5:25 p.m., the committee was adjourned.]

[Responses to Interrogatories of Nancy Hernreich follow:]

Responses to Interrogatories of Nancy Hernreich

Question 1:

Was James Riady on any list of individuals who received or who were to receive the President's private zip code?

Answer to Question 1:

I have no first-hand knowledge regarding whether James Riady received or was designated to receive the President's personal correspondence zip code. To respond to this question, I have consulted our records and determined that they do not indicate that Mr. Riady received or was ever designated to receive the President's personal correspondence zip code.

Question 2:

Was James Riady given the President's private zip code?

Answer to Question 2:

See above.

Question 3:

Did James Riady utilize the President's private zip code?

Answer to Question 3:

I have reviewed records collected from my office in response to this Committee's investigation. Based on this review, there is no indication that Mr. Riady ever utilized the personal correspondence zip code, nor do I have any knowledge that he ever used this zip code.

I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge.

Executed on: February 6, 1998

Nancy Hernreich
Assistant to the President and
Director of Oval Office Operations

[The depositions of Kelly Ann Crawford and Carol Khare follow:]

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
U.S. HOUSE OF REPRESENTATIVES,
Washington, DC.

DEPOSITION OF: KELLY ANN CRAWFORD

MONDAY, NOVEMBER 10, 1997

The deposition in the above matter was held in Room 2247, Rayburn House Office Building, commencing at 10:00 a.m.

Appearances:

Staff Present for the Government Reform and Oversight Committee: Jennifer M. Safavian, Investigative Counsel; Jason Hopfer, Investigative Attorney; and Andrew J. McLaughlin, Minority Counsel.

For KELLY ANN CRAWFORD:

DAVID A. WILSON, ESQ.
Hale and Dorr
1455 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Ms. SAFAVIAN. Good morning. On behalf of the members of the Committee on Government Reform and Oversight, I appreciate and thank you for appearing here today.

This proceeding is known as a deposition. The person transcribing this proceeding is a House reporter and notary public. I will now request that the reporter place you under oath.

THEREUPON, KELLY ANN CRAWFORD, a witness, was called for examination by Counsel, and after having been first duly sworn, was examined and testified as follows:

Ms. SAFAVIAN. I would like to note for the record those who are present at the beginning of this deposition. My name is Jennifer Safavian, designated majority counsel for the Committee. I am accompanied today by Jason Hopfer who is with the majority staff. Andrew McLaughlin is the designated minority counsel for the Committee. The deponent is represented by David Wilson.

Although this proceeding is being held in a somewhat informal atmosphere, because you have been placed under oath your testimony here today has the same force and effect as if you were testifying before the Committee or in a courtroom.

If I ask you about conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and then you may give me the gist or substance of any such conversation, to the best of your recollection. If you recall any part of a conversation or only part of an event, please give me your best recollection of those events or parts of conversations that you recall. If I ask you whether you have any information upon a particular subject, and you have overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you do have such information and indicate the source, either a conversation or documentation or otherwise, from which you derive such knowledge.

Before we begin the questioning, I want to give you some background about the investigation and your appearance here.

Pursuant to its authority under House rules X and XI of the House of Representatives, the Committee is engaged in a wide-ranging review of possible political fundraising improprieties and possible violations of law under the Committee's jurisdiction.

Pages 2 through 4 of House Report 105–139 summarizes the investigation as of June 19, 1997 and encompasses any new matters which arise directly or indirectly in the course of the investigation. Also, pages 4 through 11 of the report explain the background of the investigation. All questions related either directly or indirectly to these issues, or questions which have a tendency to make the existence of any pertinent fact more or less probable than it would be without the evidence, are proper.

The Committee has been granted specific authorization to conduct this deposition pursuant to House Resolution 167, which passed the full House on June 20, 1997. Committee Rule 20, of which you have received a copy, outlines the ground rules for the deposition.

Majority and minority Committee counsels will ask you questions regarding the subject matter of the investigation. Minority counsel will ask questions after majority counsel has finished. After minority counsel has completed questioning you, a new round of questioning may begin. Members of Congress who wish to ask questions will be afforded an immediate opportunity to ask their questions. When they are finished, Committee counsel will resume questioning.

Pursuant to the Committee's rules, you are allowed to have an attorney present to advise you of your rights. Any objection raised during the course of the deposition shall be stated for the record. If the witness is instructed not to answer a question or otherwise refuses to answer a question, majority and minority counsel will confer to determine whether the objection is proper. If counsel agree that a question is proper, the witness will be asked to answer the question. If an objection is not withdrawn, the Chairman or a member designated by the Chairman may decide whether the objection is proper.

This deposition is considered as taken in executive session of the Committee, which means it may not be made public without the consent of the Committee, pursuant to clause 2(k)(7) of House rule XI. You are asked to abide by the rules of House and not discuss with anyone, other than your attorney, this deposition and the issues and questions raised during this proceeding.

Finally, no later than 5 days after your testimony is transcribed and you have been notified that your transcript is available, you may submit suggested changes to the Chairman. The transcript will be made available for your review at the Committee office. The Committee staff may make any typographical and technical changes requested by you.

Substantive changes, modifications or amendments to the deposition transcript submitted by you must be accompanied by a letter requesting the changes and a statement of your reasons for each proposed change. A letter requesting any substantive changes, modifications, clarifications or amendments must be signed by you. Any substantive changes, modifications, clarifications or amendments shall be included as an appendix to the transcript conditioned upon your signing of the transcript.

Do you understand everything that we have gone over so far?

Mr. WILSON. I want to note for the record to the extent it is fine, if you understand, you can answer yes. But I do not think it is appropriate to construe your understanding as being necessarily an agreement that everything that has been stated is in fact a correct interpretation of the authority of the Committee or the scope of the investigation. But the question was, do you understand what she has told you?

The WITNESS. I have heard what you have read. I have a general understanding, I guess.

Ms. SAFAVIAN. Do you have any questions about anything that we have gone over?

The WITNESS. I do not think so, no.

Mr. MCLAUGHLIN. We have been making it a practice to, if it is convenient, to send depositions out for review subject to agreement that you will not show it to anybody. We have been doing that for every other witness. I can't imagine we wouldn't do it in your case, if it is more convenient.

Mr. WILSON. That would be great.

Ms. SAFAVIAN. That would be subject to both of you signing a confidentiality agreement before we would send the transcript out to you.

Mr. WILSON. That is fine.

Ms. SAFAVIAN. I will be asking you questions concerning the subject matter of this investigation. Do you understand?

The WITNESS. Yes.

Ms. SAFAVIAN. If you don't understand a question, please say so and I will repeat it or rephrase it so that you understand the question. Do you understand that you should tell me if you do not understand my questions?

The WITNESS. Absolutely.

Ms. SAFAVIAN. The reporter will be taking down everything we say and will make a written record of the deposition. You must give verbal, audible answers because the reporter cannot record what a nod of the head or other gesture means. Do you understand that you cannot answer with an "um-hum" or nod of the head?

The WITNESS. Yes, I do.

Ms. SAFAVIAN. If you can't hear me, please say so and I will repeat the question or have the court reporter read the question to you. Do you understand?

The WITNESS. Yes, I do.

Ms. SAFAVIAN. Please wait until I finish each question before answering and I will wait until you finish your answer before I ask the next question. Do you understand that this will help the reporter make a clear record because she cannot take down what both of us are saying at the same time?

The WITNESS. Yes, I do.

Ms. SAFAVIAN. Your testimony is being taken under oath, as if we were in court, and if you answer a question it will be assumed that you understood the question and the answer was intended to be responsive. Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. Are you here voluntarily or as a result of a subpoena?

The WITNESS. I am here as a result of your request to have me here.

Mr. MCLAUGHLIN. Did you volunteer to come here?

The WITNESS. I guess I did.

Mr. MCLAUGHLIN. You got something in the mail?

The WITNESS. I was asked to come, and I am happy to be here to cooperate with you all and answer your questions.

Ms. SAFAVIAN. Do you have any questions about the deposition before we begin the substantive portion of the proceeding?

The WITNESS. No.

Mr. MCLAUGHLIN. I will make my usual note as to an omission from the prior statement of the rules. Pursuant to House rule XI 2(k)(8), objections to relevance are the province of the full Committee and not the Chairman to resolve. Accordingly, any ruling on an objection as to relevance is appealable to the full Committee.

EXAMINATION BY MS. SAFAVIAN:

Question. Can you please state your full name and spell it for the record?

Answer. Kelly Ann Crawford, K-E-L-L-Y, A-N-N, C-R-A-W-F-O-R-D.

Question. Have you ever used or been known by any other names?

Answer. No.

Question. What is your date of birth and Social Security number?

Mr. WILSON. Objection.

Mr. MCLAUGHLIN. Objection. That is totally irrelevant. The person giving testimony today is not the target of this so-called investigation. She is a witness. Accordingly, her Social Security number is utterly irrelevant.

I think that the only implication of the question that can fairly be drawn is that counsel is trying to intimidate the witness by suggesting that somehow she may be a target of the investigation. That implication is unfounded. Accordingly, I object as to either piece of information.

Furthermore, I would simply note in passing that these depositions have traditionally been made available on the Internet, and to subject this witness to the kinds of financial fraud that come along with the public release of a Social Security number, and frankly even a date of birth, is to my mind unfounded and frankly borders on the obnoxious.

Mr. WILSON. I would ask that the question be withdrawn with the assurance from counsel that if you can, if Committee counsel can provide to me a reason for doing so, for providing this information, I would be happy to do it in a letter. But I am concerned about the privacy issues that may be raised by divulging this kind of information.

Ms. SAFAVIAN. The witness' date of birth and Social Security number is something that we ask of all deponents.

Mr. MCLAUGHLIN. That is untrue.

Ms. SAFAVIAN. The reason being is we receive documents in response to our subpoenas which may have date of birth or Social Security number, and it allows us to make sure that Kelly Crawford who is sitting here today is the same Kelly Crawford whose name may appear on the document. We are not aware if there is another Kelly Crawford or another Crawford. It helps us make sure that we know what documents may come up which have her name, to make sure it is the Kelly Crawford who is sitting in front of me and not someone else.

Mr. MCLAUGHLIN. First of all, that is absolutely untrue, as the record will reflect, that we have been asking this question of all witnesses. I would say it has been asked of substantially fewer than half of the witnesses that have come before the Committee. In general, the question has been withdrawn when counsel has offered to make the information available through other means.

Second of all, I am not aware of any document that has come into the possession of this Committee that would implicate the date of birth or Social Security number of Kelly Crawford. As I have said numerous times, this witness is not a target. We

have not received any bank records or phone records from her, nor would I expect that we ever would because, as I said, she is not a target.

Accordingly, I think counsel should withdraw the question. If a plausible reason can be propounded as to why the information is necessary, then I am sure counsel will supply it in a prompt and comprehensible manner. To put it on the record just seems to me to be characteristically inappropriate to this Committee.

Mr. WILSON. If there are documents that you need help deciphering or identifying—as you say, I do not think there is any other Kelly Crawford that comes within the scope of this investigation—I am happy to try to help you with that or even provide the information later on. But having represented witnesses in other proceedings conducted by this Committee that were similar, I do know that while depositions begin as being confidential, they do not always end up that way. I would just prefer not to have Kelly's date of birth and Social Security number out there for all to see.

Ms. SAFAVIAN. I do not plan on spending much time on this. I will—that is fine if you are instructing your client not to answer those two questions—I will then——

Mr. MCLAUGHLIN. I do not think that is what he said. He said he will supply——

Ms. SAFAVIAN. I will rely on your representation that if I do have a question down the road that I can contact you to find out the answer.

Mr. WILSON. Absolutely. And really, I am not instructing her not to answer. I just requested that you withdraw the question and we will provide the information.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Crawford, your current address?

Answer. [Redacted].

Question. How long have you lived at that address?

Answer. About less than two months.

Question. Prior to that address?

Mr. MCLAUGHLIN. Objection. We certainly do not need this information either. I think it is, again, a sort of bizarre signal and characteristically inappropriate to be sending to the witness, that somehow her past addresses might be relevant to the Committee. I suggest that you move forthrightly into the questions that might actually be relevant to the Committee investigation instead of dithering around in these questions.

EXAMINATION BY MS. SAFAVIAN:

Question. You may answer the question.

Answer. [Redacted].

Question. Have you ever lived outside the United States?

Answer. I studied abroad for four months when I was a junior in college.

Question. Where was that?

Mr. MCLAUGHLIN. Objection as to relevance.

The WITNESS. Austria, Vienna.

EXAMINATION BY MS. SAFAVIAN:

Question. Where did you attend college?

Answer. American University here in Washington.

Question. Did you graduate from American?

Answer. Yes.

Question. What was your degree?

Answer. It was a degree from the School of Public Affairs and the major was called CLEG: Communications Law, Economics and Government.

Question. Did you receive any other degrees?

Answer. No.

Question. Have you spoken with anyone other than your counsel and my office about scheduling the deposition? Have you spoken with anybody else about this deposition?

Answer. When I got a call from you, I talked to some people about finding a lawyer, but not specifically about what we had discussed or what I was coming here today to discuss.

Question. Did you review any documents in preparation for your deposition?

Mr. MCLAUGHLIN. Other than from counsel? Other than from her counsel?

Mr. SAFAVIAN. She can answer if she reviewed documents.

Mr. MCLAUGHLIN. I am asking you a question. The question is not clear to me. You don't have to snap at me.

EXAMINATION BY MS. SAFAVIAN:

Question. Did you understand my question?

Mr. MCLAUGHLIN. Let me finish. The question is, are you asking her whether she has reviewed any documents other than in connection with an attorney-client communication? Is that what you are asking?

Ms. SAFAVIAN. No, my question was, did you review any documents in preparation for this deposition?

Mr. MCLAUGHLIN. You do intend to go into the attorney-client confidence or you don't? One way or the other.

Ms. SAFAVIAN. If you would just let the deponent answer the question, if she tells me she reviewed documents with her attorney, I will not delve into attorney-client privilege. You have just not allowed her an opportunity to answer the question.

Mr. MCLAUGHLIN. If you asked a more carefully crafted question, you would avoid my objections.

EXAMINATION BY MS. SAFAVIAN:

Question. Did you understand my question, Ms. Crawford?

Answer. If you could describe to me what you mean by—I haven't reviewed any documents. I do not have documents my possession.

Question. That is fine. That was the answer to my question.

Answer. I don't know what you mean by documents but, no.

Mr. WILSON. I would note for the record that I have shown the witness the correspondence from the committee that I received.

The WITNESS. Yes, a letter from Chairman Burton. I guess that would be a document.

EXAMINATION BY MS. SAFAVIAN:

Question. Have you been asked by White House Counsel or anybody else to collect documents in response to either the House, Senate or Department of Justice subpoenas?

Answer. I do not work at the White House any longer. I do not recall if when I was working at the White House, whether any of this had started. At that time I may have looked for an answer to a subpoena but I don't know what it would have been.

Mr. MCLAUGHLIN. Why don't you lay some foundation for where she worked and when? Maybe some of these questions can be skipped over as being obviously not——

The WITNESS. I haven't worked at the White House for——

Mr. WILSON. Are you talking about pursuant to subpoena relating to the subject of this investigation?

Ms. SAFAVIAN. Yes.

Mr. WILSON. Okay. So relating to fund-raising.

Mr. MCLAUGHLIN. And the other matters which this investigation has sprawled into.

The WITNESS. I do not believe so, no.

EXAMINATION BY MS. SAFAVIAN:

Question. Thank you.

Can you please briefly describe your employment history after college?

Answer. I graduated from American University in May of 1992 and volunteered at the Democratic Convention in New York. Shortly after the convention, I started doing advance work for the Clinton campaign. I did press advance up until the election in November, and after the election I worked during the transition for the transition committee. I worked in the basement of the governor's mansion. And after the transition, I worked as a staff assistant in the Media Office of the President.

I left there, I believe, in July of 1995 and worked at the Justice Department in the Public Affairs Office for Attorney General Reno. I did all of her personal press. I was there for about a year.

I left and went to work at the Clinton-Gore campaign in the communications office. And then when the election of 1996 was over, I worked at the Presidential Inaugural Committee. And when the Inaugural was over I—shortly thereafter, must have been in February or March—started working at the Treasury Department where I am currently employed.

Question. February or March of this year?

Answer. Yes.

Question. Can you tell me, you mentioned that you were a staff assistant in the President's office. Do you recall when you began that job?

Answer. The day after the President was sworn in as President, January of 1993.

Question. Then you said you left that in July of 1995?

Answer. Yes, I believe it was right around there, yes.

Question. Were you approached about taking this position, or how was it that you ended up as a staff assistant in the President's office?

Answer. As I mentioned to you before, I had worked during the transition in the basement of the governor's mansion. I worked with Nancy Hernreich, who then went on to work in the President's office at the White House. She asked me to come on in this capacity.

Question. Did you have to interview with anybody other than perhaps Nancy Hernreich?

Answer. I talked with Nancy Hernreich about it. I met with Carolyn Huber about it. I think that is probably all that I talked to about it.

Question. Who is Carolyn Huber?

Answer. She was—at that time she was also going to be working not in the President's office but in what they called the Personal Correspondence Office, which was the area that worked with the friends and family of the First Family. That was some of what I was going to be doing. So I met with her at the Blair House prior to——

Question. Can you tell me as a staff assistant what were your job responsibilities or duties?

Answer. I worked directly for Nancy Hernreich. I answered phones, opened mail. I talked with the President's friends and family that would call his office.

Question. Was Nancy Hernreich your supervisor?

Answer. Yes.

Question. Did you report to anybody besides Ms. Hernreich?

Answer. I reported to Ms. Hernreich.

Question. Did you have an office?

Answer. I shared an office.

Question. Was it with one other person or was like it a bigger room?

Answer. It was a room that there were four desks within one room.

Question. Where was that located, if you could just describe briefly where it was located in relation to Ms. Hernreich's office, the President's office?

Answer. It was in the West Wing. Ms. Hernreich switched the location of her office. She used to be on one side of the Oval Office; then she went to the other side of the Oval Office. I continued to stay two rooms down from the Roosevelt Room in the West Wing.

Question. Did you ever work out of any other location or did you pretty much stay right there?

Answer. I pretty much stayed in that——

Question. Were you the only staff assistant, or were there others under Ms. Hernreich?

Answer. I was the only staff assistant.

Question. You explained your job duties and responsibilities as opening mail or speaking with the President's friends. Were you in charge of the radio address for the President?

Answer. I worked on the radio address, yes.

Question. Who organized the radio address?

Answer. In the beginning—well, it ultimately was Nancy's responsibility but obviously I worked for Nancy. At one time there was another gentleman who also worked on organizing the radio address but, yes, I worked on organizing the radio address.

Question. Who was that other person?

Answer. Dave Levy, who worked also in the West Wing.

Question. Was it just the two of that you would assist Ms. Hernreich in organizing the radio addresses?

Answer. Yes.

Mr. WILSON. You are talking about just sort of logistically?

The WITNESS. That I wrote the speech? I mean, I should clarify that this is the people who came to watch the radio address. I worked with Ms. Hernreich on, you know, those who came in to watch the radio address.

EXAMINATION BY MS. SAFAVIAN:

Question. I was going to ask you to just explain what it was that Ms. Hernreich and yourself and Mr. Levy would do to prepare for the radio address, if you would like to explain that.

Answer. Sure. The radio address was primarily an opportunity for the President to see friends and family who were in from out of town. But as the radio address went on, obviously people heard about the opportunity to come and listen to the President speak in the Oval Office and then have pictures made with the President, so we got requests from Members of Congress and their staff, from members of the media, from members of the Cabinet, from offices within the White House.

So we would compile all these requests and then sit down with Ms. Hernreich and decide who, how many requests we could accept, and then who was and was not coming. And then on the day of the radio address I would, or the day before, maybe, clear people in; and then greet people when they came, and sometimes introduce them to the President as they came through the line.

Question. Can you tell me, was there generally a certain number of people who would attend the radio address, like the maximum number?

Answer. Week to week, it just depended. We began to, as more and more people came, sometimes we would take some of the furniture out. There was probably maybe 80 people that we could fit into the Oval Office, 80 to 90.

Question. Did you normally have about 80, 90 people at each radio address?

Answer. It varied from week to week.

Question. Would you prepare a list of all the attendees for each radio address?

Answer. Either I would or Mr. Levy would, but, yes, there would be a list of who was there.

Question. What would be on the list? What would it include?

Answer. Usually just names and maybe one description, like "Kelly Crawford," you know, something to indicate where this person worked, or "friend from high school" or something like that. There might be something indicating who the person was or just names.

Question. Okay. You mentioned that you would get requests from all over for the radio address. Did you ever try to limit it, say, only to friends of the President or people who work in the White House or Members of Congress? Did you ever try to limit it to just certain groups of individuals?

Answer. I don't quite understand the question.

Question. The people who you would let attend the radio address, I assume that your office would get a lot of requests to attend the radio address and surely you could not allow everyone to attend the radio address. Was there any way that your office determined who would be invited to attend and who might not be?

Answer. I really was just a facilitator. I put the list together, but Nancy ultimately——

Mr. WILSON. You are talking about priorities in terms of groups, like friends and family or Members of Congress or——

EXAMINATION BY MS. SAFAVIAN:

Question. If there was any way that you distinguished or determined who would be invited to a radio address and who might not be invited to a radio address. I am using that as an example. It may not have happened that way. I don't know.

Mr. MCLAUGHLIN. Why don't you ask, did you give special treatment to donors? Did you give special treatment to contributors?

The WITNESS. Let me tell you how I—I did not make these decisions. I was a facilitator. I gathered requests that came in. But it was my understanding that the President's friends or family, people from out of town that he knew were the first priority. In addition, White House staff and their immediate families. And then after that there were obviously Members of Congress, if they were—if they had asked to come, would have been a priority. But those decisions were largely made by Ms. Hernreich, not myself.

EXAMINATION BY MS. SAFAVIAN:

Question. Was it Ms. Hernreich who would then provide you with a list of names or somehow tell you who you should include on your list of attendees, or how did you know?

Answer. We would go through the list, and say another determination would be if someone was in town just for this weekend, and/or versus someone who lived in Washington.

Question. But pretty much a decision was left to Ms. Hernreich?

Answer. It was ultimately her decision. I was her assistant in the President's office.

Question. So then did the two of you sit down and you would just have a list of everyone who requested to be in attendance at that radio address, and the two of you would kind of go through each name?

Answer. Yes. We would go through a list, and then I would have supporting things like a letter from Joe Schmo saying, "This is the only time I have been in town and I would love to come." So we would go through those.

Question. When would that process usually begin?

Answer. I guess maybe two days before the actual radio address, maybe two or three days. On a Wednesday or Thursday, if the radio address was on a Saturday.

Mr. WILSON. You mean the process of interacting with Nancy Hernreich to pare down the list of who requested attendance?

Ms. SAFAVIAN. Yes.

Mr. WILSON. As opposed to when requests might come in. Which might be six months in advance or something?

EXAMINATION BY MS. SAFAVIAN:

Question. I meant specifically when you and Ms. Hernreich would kind of sit down and go over your list of possible attendees.

Answer. It was never a set schedule. Two or three days before the radio address, I guess is when we would.

Question. And then who would notify an individual that they were going to be permitted to attend the radio address?

Answer. It depended, because some requests, I should also—Mr. Levy did some of the requests and I did some of the requests, but also maybe someone from the Office of Public Liaison would request that a group of health care advocates would come. That might go back to the person at the White House who had requested it and they would then extend the invitation, clear the people in.

Or say in the case of friends of the President, I would then be the person that would call them back and extend the invitation. So it just depended on if someone had requested it directly to me or if someone else within the White House had made the request through me.

Question. Okay. I know you mentioned that David Levy did some of them and you did some of them. Was there any distinction as to—was it just random who got in charge of one radio address over another?

Answer. We worked together and, as I indicated before, I primarily took care of friends of the President, family members. But people knew that I worked on it and people knew that he worked on it, so it overlapped as to——

Question. So, in other words, the two of would you work together on each radio address. It was not like you had one one week and he had the next?

Answer. No, we would work together.

Mr. WILSON. You have to let her finish talking before you talk.

The WITNESS. Sorry.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall the March 11, 1995 radio address?

Answer. I do not recall a specific date. I am sure that if it was a Saturday and the President was in town, there would be a radio address.

Question. Do you know who Johnny Chung is?

Answer. Yes.

Question. Have you met Mr. Chung?

Answer. Yes, I have met Mr. Chung.

Question. On how many occasions?

Answer. I don't know. If I had to estimate, I would say maybe a handful of times.

Question. Do you recall how you first met Mr. Chung or were introduced to him?

Answer. I don't know if the first time—I don't know when—the first time that I met him, whether it was a radio address. I don't know the first time that I met him, no.

Question. When you said you maybe met with him on a couple occasions, a handful of occasions——

Mr. WILSON. You are saying met with him. I think your question was how many times did she meet him, and I was going to suggest that that might be just a little ambiguous. Do you mean see him, or shake his hand, or have a conversation with him? I just want the record to be clear about the extent of her contact.

Ms. SAFAVIAN. That was going to be my question.

EXAMINATION BY MS. SAFAVIAN:

Question. If you can just explain, you said a handful of occasions. Do you recall perhaps what the setting was of those handful of occasions where you saw Mr. Chung?

Answer. I have a vague recollection that I saw him possibly at a helicopter departure. And other than that, I don't know where I saw him. Maybe just on the White House grounds, but I do not remember specifically or have any recollection of exactly when I saw him.

Mr. MCLAUGHLIN. Did you ever have a meeting with him?

The WITNESS. No, I never sat down and met with Mr. Chung.

EXAMINATION BY MS. SAFAVIAN:

Question. Did you ever have any discussions with him, any conversations?

Answer. Did I ever talk to Mr. Chung?

Question. Yes.

Answer. Yes, I talked to Mr. Chung. Sure.

Question. Would that just be a general greeting or would it have ever been anything more than that?

Answer. I do not believe that my talking with Mr. Chung would have been anything more than a typical greeting, as I did with you when we walked into the room.

Question. Okay. The March 11, 1995 radio address, do you recall it, if I were to tell you that that is the radio address where Johnny Chung and the Chinese delegation attended the radio address?

Answer. I have a vague recollection of the Saturday that they attended a radio address. I have of course seen numerous press accounts of this radio address. Yes, I have a vague recollection. It is hard for me to remember exactly what I recall versus what I have read about, but, yes, I do have a recollection that he attended a radio address.

Question. What I am handing you are WAVE records for the year 1995. If you will turn to where—on the bottom there are Bates Stamp Numbers—if you will turn to EOP 005038, if you will look down——

Answer. It is very difficult to read.

Question. If you look about five down, five or six down, you will see where Johnny Chung, the visit—he is—"visited POTUS," President of the United States, and if you continue to read to the right, to the middle, it shows a date. It shows that it is March 11, 1995.

Answer. Yes.

Question. And the room is WW, which stands for?

Answer. West Wing, I assume.

Mr. MCLAUGHLIN. Have you seen these WAVE records before? Is this the first time you have seen this document?

The WITNESS. Yes, this is the first time I have seen this document or seen a document like this.

Mr. MCLAUGHLIN. Do you notice there is no badge number, time of arrival or time of departure? And I will represent to you that that is what the last three categories are. I know that he was there, but do you see that?

The WITNESS. Yes, I see the dot, dot, dot, dot, dot.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you notice, if we continue down, there is a name who requested Mr. Chung's clearance. It says "Crawford." Would that be you?

Answer. I assume it would be me.

Question. Do you recall going through the process, you can explain it to me, of waving in Mr. Johnny Chung on March 1, 1995?

Answer. I may have waved him in, but I have no distinct recollection.

Mr. MCLAUGHLIN. Would you have waved in everybody for a particular radio address?

The WITNESS. As I said, it depended. Some people—I waved in a lot of people, yes—but some people, anyone in the White House could wave someone in. So say you had put in a request through the Office of Legislative Affairs, and Joe Schmo in Legislative Affairs was the person that requested to me, I might just say, "Hey, would you go ahead and clear in your guest?" So sometimes I cleared people in or sometimes I did not. It was not a——

EXAMINATION BY MS. SAFAVIAN:

Question. You don't have any recollection, as we sit here right now, that you waved in Johnny Chung on that day?

Answer. I cleared in many, many people. I do not specifically recall clearing Mr. Chung in on this date. No.

Question. Do you recall clearing in anybody in the Chinese delegation?

Answer. Again——

Mr. WILSON. By "the Chinese delegation," just because that characterization could mean many things, you are talking about the Chinese gentlemen who have been reported as accompanying Mr. Chung to the radio address?

Ms. SAFAVIAN. That is correct. I can show you a letter that Johnny Chung sent to Richard Sullivan, dated February 27, 1995, which includes a list of the gentlemen that I am referring to as the Chinese delegation. If you turn to the second page, which is DNC 323332——

The WITNESS. Yes?

Mr. MCLAUGHLIN. Before we get confused here, let me make a housekeeping request. Can you mark the copy that you showed the witness to go in the record? I know that we do not adhere to the Rules of Civil Procedure here, but in ordinary deposition practice the copy that the witness sees is the copy that goes into the record. I would appreciate it if you would mark that one to go in.

Second thing is, before I move on from this first exhibit, I want to note all of the EOP page numbers because there are nonconsecutive pages marked here. They are as follows: EOP 005039, EOP 008683, EOP 005038, EOP 008680, EOP 003717, EOP 003713, EOP 005035, EOP 003710, EOP 005032, and EOP 003703. Are you going to mark that document?

Ms. SAFAVIAN. I will, certainly, if you would just give me a moment.

Mr. MCLAUGHLIN. I just want to make sure that you can mark the copy that the witness has. I do not mean to be a stickler but I like to have the document numbers read in.

Ms. SAFAVIAN. We will be marking the 1995 WAVE records of Mr. Johnny Chung as Exhibit Number 1, KC–1.

We will be marking the February 27 letter to Richard Sullivan as Exhibit Number 2, KC–2.

[Crawford Deposition Exhibit No. KC–1 was marked for identification.]

[Note.—All exhibits referred to can be found at end of deposition.]

[Crawford Deposition Exhibit No. KC–2 was marked for identification.]

Mr. MCLAUGHLIN. Have you seen Exhibit 2 before?

The WITNESS. No, never.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Crawford, you do not have, as you are sitting here today, a recollection that you did wave in Mr. Johnny Chung or the Chinese delegation members for this radio address?

Answer. I may have but, no, I do not have a specific recollection.

Question. Ms. Crawford, can you explain to us how Johnny Chung and this Chinese delegation were able to attend the March 11, 1995 radio address?

Mr. WILSON. Do you mean explain her knowledge of how they got in, or how they came to find out about it, or just in——

EXAMINATION BY MS. SAFAVIAN:

Question. Your knowledge as to how they were able to attend the radio address.

Answer. As I mentioned earlier, I have a vague recollection of this Saturday, and I believe that the request came to me from the chairman's office at the DNC.

Question. Would that be Don Fowler?

Answer. I believe he was the chairman at that time.

Question. You said you believe that the request came from the DNC chairman's office?

Answer. Yes.

Question. Do you recall who that was that made the request to you?

Answer. I do not specifically recall, but I know Ceandra Scott worked in the office at that time. I have heard press accounts that she may have been, but I don't specifically recall. Some staffer, I believe, in Chairman Fowler's office.

Question. Do you know Ms. Scott, Ceandra Scott?

Answer. Yes.

Question. Do you know her well?

Answer. No.

Question. Did you know each other well enough that if she wanted to ask, request someone to attend the radio address, she would have contacted you?

Answer. Yes, that would not have been unusual.

Question. Had she ever requested you, or if you recall any other time, requested that you perhaps admit another individual or individuals into a radio address?

Mr. WILSON. I do not think she testified that that is what Ceandra Scott did in this case. Maybe you could ask her how a conversation like that might go rather than suggesting that—well, suggesting how it did go.

Ms. SAFAVIAN. I was trying to figure out if you recall Ms. Scott ever contacting you on another occasion. I am not saying that you testified that she did contact you on this occasion. Did she ever contact you on another occasion and ask you to get somebody into a radio address?

Mr. WILSON. That is what I am objecting to, to get somebody into a radio address, if that suggests that that is what Ceandra Scott said at this particular time. I do not think it has been established what she did say, whether it was, "Can you get somebody in?" or "Do you have room?" or something else. So I know I am—maybe the best thing to do is just ask her how a conversation like that with Ceandra Scott would go, to the extent she can recall.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall any such conversations like that, Ms. Crawford?

Answer. I don't specifically recall other conversations. I am not saying that there wasn't ever another conversation with Ms. Scott or another request that came to me through her, but I do not have specific recollection.

Question. Did you know any other individuals who worked at the DNC or in the chairman's office who would have contacted you about such a request?

Answer. What such request? Just general requests that would come through the DNC? I am not sure I understand the——

Mr. WILSON. You mean a request to see the radio address?

EXAMINATION BY MS. SAFAVIAN:

Question. Yes. For the radio address.

Answer. I knew other people at the DNC, sure, who I believe probably made requests as well. So it was not completely unusual to have a request from someone at the DNC.

Question. Can you recall those individuals' names who may have contacted you?

Answer. Possibly—this is, if you want me to speculate about people that I know at the DNC who could have called me to possibly request, I can do that. But I do not have a recollection, sitting here today, three years ago what requests came in from the DNC. If you want me to speculate——

Mr. MCLAUGHLIN. As it says in the instructions, we are not interested in speculation.

EXAMINATION BY MS. SAFAVIAN:

Question. You mentioned that it was not—I do not want to put words in your mouth. Was it unusual for the DNC, somebody at the DNC, to contact either yourself or Nancy Hernreich or someone at your office and ask that a particular individual or DNC contributor be given access or be allowed to attend a presidential radio address?

Mr. MCLAUGHLIN. Your question includes the word "contributor." I do not think Ms. Crawford has stated anything about whether or not these people were contributors or whether she knew. Why you don't rephrase your question, sticking to the knowledge and the testimony that has been established.

EXAMINATION BY MS. SAFAVIAN:

Question. Did you understand my question?

Mr. MCLAUGHLIN. I am not asking. I am telling you I object to your question on the grounds that it misstates her prior testimony.

Ms. SAFAVIAN. Your objection is noted for the record.

Mr. MCLAUGHLIN. It is sort of a funny exchange that we have here, because you then ask the witness if she understands the question. I am making an objection. I would like you to respond to the objection.

Ms. SAFAVIAN. Your objection is noted for the record.

You may answer.

The WITNESS. May I talk to my counsel?

Ms. SAFAVIAN. Sure.

[Witness confers with counsel.]

Mr. MCLAUGHLIN. If you want your question to go ahead while it misstates that kind of testimony, that is your choice, counsel, but I think it is a uniquely ill-considered, poor choice to proceed in that manner.

The WITNESS. It was not unique that we would get requests from the DNC, as we got requests from Cabinet agencies, Members of Congress, members of the press. But people were never stated as being contributors to me.

EXAMINATION BY MS. SAFAVIAN:

Question. But the request would come from the DNC. Would it be a request that the DNC employees or staff members——

Answer. Sometimes, sure.

Question. But not always?

Answer. Not always, no.

Question. Was there any particular procedure that yourself or Ms. Hernreich would then follow?

Answer. One other thing that I should state is that within the White House there is also the Office of Political Affairs, so requests might also come through—there was not a set way that every request came through a specific channel. So requests could also come from the Office of Political Affairs, as well.

Question. And the previous question was, was there any particular manner in which either yourself or Ms. Hernreich would handle such requests?

Mr. WILSON. You mean requests that came from the DNC directly?

EXAMINATION BY MS. SAFAVIAN:

Question. Correct.

Answer. They would have been handled in the same way that any other requests were handled which, as I stated before, we compiled the requests and then would sit down and talk about them. Unless possibly, as we would with other requests, if a Cabinet official called, we would let Cabinet Affairs know Secretary Riley from Education had requested to come in; or if a request from the DNC came, we might let Political Affairs know that we had this request and check with them. I am not saying that that was done in every single case, but it would not have been unusual for that to happen.

Question. Was it your testimony that you believe Ceandra Scott was the one that contacted you about Johnny Chung and the Chinese delegation attending the radio address?

Answer. I don't have specific recollection of who exactly in the chairman's office contacted me about Mr. Chung.

Question. But you do have a specific recollection that it was someone in the chairman's office of the DNC?

Answer. Yes, I believe that is where the request came from.

Question. Do you recall when the request came to you?

Answer. I believe that the request came late on a Friday, or sort of not way ahead of time, sometime close to the radio address. I have some recollection that it was kind of a last minute request.

Question. The day before the radio address?

Answer. Yes.

Question. Do you——

Answer. But I do not specifically recall what time or when.

Question. Do you have any specific recollection as to what was asked of you?

Answer. I was asked if—I do not have a specific recollection of what the conversation was. I assume I was asked did we have room in the radio address for Mr. Chung and his guests.

Question. What would your response have been?

Answer. I don't specifically recall what I did in this case but I can tell you generally what the practice was, that I would say, "Let me check and see. Let me get a phone number and I will call you back." As I have said before, I would then check with Ms. Hernreich to see if we did in fact have room and if in fact this was someone that we should allow to attend the radio address.

Question. Would you think—you said the request came in late, perhaps the day before.

Answer. I said I believed that the request—I have some recollection that the request came in——

Question. Came in late?

Answer. Yes.

Question. Do you have any recollection as to whether at the time the request came in you already had determined who was going to attend the radio address for that Saturday?

Mr. WILSON. You mean whether the—whether anybody had been cleared in to see the radio address?

EXAMINATION BY MS. SAFAVIAN:

Question. Whether you and Ms. Hernreich had already sat down and discussed who was going to attend the radio address?

Answer. I am not sure that you understand the process. It was not like we made a decision and—this was sort of if there was room, other requests would be taken. It would not be unusual that on a Friday we would learn that someone happened to be in town or that someone extended their visit and was going to stay.

I do not specifically recall in this case what the standard procedure was. But I do not remember it as being with a whole—the whole slew of requests, which makes me, as I indicated earlier, believe that it came in later.

Question. Okay. You had mentioned that when requests would come in, generally you would take down the person's name and say, "I will have to see and get back with you." So in this instance you recall that you would have said the same thing to this individual in the chairman's office of the DNC?

Answer. I don't have specific knowledge of what I said to that person, but that was the general practice. I can't swear that this is what I said on that occasion, but that would have been what I generally would have said.

Question. Do you recall then speaking with Ms. Hernreich about this request?

Answer. I spoke with Ms. Hernreich about hundreds of such requests. I do not recall having a specific conversation about this request, no.

Question. Do you recall then contacting this individual back at the DNC, the chairman's office of the DNC, and letting them know that these—that Mr. Chung and the Chinese delegation were able to attend the radio address?

Answer. No, I do not remember. I assume that it probably would have been me that would of called them back but I do not recall.

Question. Do you recall when you would have made that call?

Answer. No.

Question. Do you know how Mr. Chung knew that himself and his guests were able to attend the radio address?

Mr. WILSON. I object because particularly based on the prior testimony, I do not see how she can know what was in Johnny Chung's mind, how he might have found something out. But with that I hope clarification of the record, if you can answer it, go ahead.

The WITNESS. I don't know.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall being—do you recall being provided with a list of the individual names of the Chinese delegation, as well as Mr. Johnny Chung, who would have attended the radio address? Do you recall getting a list of their names?

Answer. I don't specifically recall getting a list of their names. I may have been the one that received the list through the DNC and cleared them in but I do not specifically recall whether I did. And if I had been the person that Saturday to put together the final list, then, yes, I would have gotten the names somehow.

Question. The final list is usually put together that day, the morning of?

Answer. The night before, usually.

Question. And what would you need for every individual who was going to attend a radio address? What kind of information would you need?

Answer. To attend or to clear them in?

Question. Both.

Answer. Well, in order to clear someone into the White House, you needed their name and date of birth and sometimes Social Security number or passport number. But as I indicated before, I did not clear in every single person that came to a radio address because other people at the White House could also clear people in and would often do so.

Question. Would this list, this final list, as you call it, of attendees, would that have had on it their date of birth, their Social Security number, perhaps,?

Answer. No. It was not standard practice that we would put that information.

Mr. MCLAUGHLIN. That information was sent to the Secret Service to wave them in?

The WITNESS. Yes, that is what that was used for.

Mr. MCLAUGHLIN. You wouldn't give the President the Social Security numbers of the individuals?

The WITNESS. No.

EXAMINATION BY MS. SAFAVIAN:

Question. You had mentioned earlier that usually you were present during the radio addresses, and you would greet the guests and sometimes introduce them to the President; is that correct?

Answer. Yes.

Question. Do you recall doing that specifically on March 11, 1959?

Answer. No, I do not recall that specific date or specifically what I did.

Question. Do you recall being present on March 11, 1995?

Answer. I do not recall that specific date. I may have been——

Mr. WILSON. Are you asking her if she recalls being present at the radio address that Johnny Chung attended?

Ms. SAFAVIAN. Yes.

The WITNESS. Yes. I don't know the date. I assume the date that you are saying is that address, but there was a radio address that I attended that Mr. Chung also attended. Yes, I have a vague recollection, as I stated before, of that radio address, yes.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall being introduced by Mr. Johnny Chung to this Chinese delegation?

Answer. I don't specifically recall.

Mr. MCLAUGHLIN. Just so the record is clear, when you say Chinese delegation——

The WITNESS. Yeah.

Mr. MCLAUGHLIN [continuing]. You mean a group of individuals accompanying Johnny Chung? Is that the term of art we're going to use for group of individuals accompanying Johnny Chung?

Ms. SAFAVIAN. Yes. That's the way they've been referred to.

The WITNESS. That's never been referred to me that way. But I understood Mr. Chung—and I know Mr. Chung came with some other gentleman to a radio address.

EXAMINATION BY MS. SAFAVIAN:

Question. Let me show you—and I'm not really sure how to explain what this is. Perhaps you can explain it to me. It is—perhaps, it says: At the top, Name List of Delegation. And at the very bottom Johnny Chung's name is listed. And at the top, there are several other individuals' names on this list.

Answer. Where is Johnny Chung? Oh, down.

Question. At the bottom under AISI representatives.

Answer. Uh-huh.

Question. And at the top of the Name List of Delegation, there's five gentlemen's names who are listed. And then under the entourage, there's three, but two are crossed off, so there's only one individual's name that is listed.

Answer. Yes.

Question. Two are crossed off. And under AISI representative, we have Johnny Chung's name, and there is one name that is crossed out. Have you seen this document before?

Answer. I just saw it a minute ago. I may have seen it. Actually, I must have seen it. That looks like my back-wrote check mark. So I may have seen this document, yes.

Mr. WILSON. You're referring to the check mark that is under 3/13 at the top.

The WITNESS. Yes. I think that's my left-handed check mark. I—I may——

Mr. WILSON. If you can identify a backwards check mark as definitively being yours, that's fine. But I don't want you to speculate because there may be other people who make backwards check marks as well.

The WITNESS. Okay.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Crawford, you make backwards check marks on documents?

Answer. I'm left-handed.

Question. Okay.

Answer. As I have said so many times before, this was a very long time ago. I don't specifically remember seeing this exact piece of paper. But I'm not going to say that I never have seen it.

Question. Okay. Just so the record is clear, you say that you just saw it a moment ago?

Answer. Isn't it——

Question. And it was similar to——

Answer. Oh, okay.

Question [continuing]. It's not identical—the Richard Sullivan—the letter to Richard Sullivan from Johnny Chung.

Mr. WILSON. Which has been marked as KC–2.

Ms. SAFAVIAN. Right. It's DNC 3233327.

EXAMINATION BY MS. SAFAVIAN:

Question. This is what you're referring to?

Answer. That's, yeah, similar.

Question. I was going to say, as you can see, there are differences between the two documents. Specifically, some of the names are crossed off.

Answer. Okay.

Question. And specifically number 2, the person listed as number 2 on the Name List of Delegation, that person's name was crossed off and is replaced by another individual's name which is handwritten on document EOP 063488. Do you see that?

Answer. Uh-huh. Uh-huh.

Question. Is that a yes?

Answer. Yes.

Question. Can you tell me, do you recognize whose handwriting this is with what looks like the dates of births by each individuals and this replaced name of number 2?

Answer. No, I do not recognize that handwriting.

Question. Do you recognize the handwriting that is on the top right and bottom right corners of this page? It looks like it says: Cc colon, Nancy Soderberg, someone from DNC asked to let into radio address. Before photos are——

Mr. MCLAUGHLIN. Sent.

EXAMINATION BY MS. SAFAVIAN:

Question [continuing]. Sent out, we need to know if we should not send them. N.H.

Do you know whose handwriting that is?

Answer. I believe it's Nancy Hernreich's handwriting. N.H. would be Nancy Hernreich.

Question. Okay. But you don't have any specific recollection of this document?

Mr. WILSON. I mean, seeing the document in this form?

Ms. SAFAVIAN. Either in this form or before it was written on.

The WITNESS. No, I don't have specific knowledge of seeing this document before. But I'm not saying that I haven't.

EXAMINATION BY MS. SAFAVIAN:

Question. Okay. Just so the record is clear, when I refer to the Chinese delegation and Mr. Chung, those who attended the radio address, we will be referring to the gentlemen who are listed on this document, EOP 063488. And I will mark that as exhibit KC–3.

Answer. Okay.

Ms. SAFAVIAN. And if I could just have your copy for a moment.

[Crawford Deposition Exhibit No. KC–3 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall on the day of that radio address, the one that Johnny Chung and this delegation of gentlemen attended, do you recall any comments by the President to you about Mr. Chung and the delegations' attendance?

Mr. WILSON. Before the radio address?

Ms. SAFAVIAN. It would be during or after most likely. Any time.

Mr. WILSON. But—wait, wait, wait. Let's narrow it down. Before? Do you want any comments the President made about the delegation at any time? I thought the question was initially before the radio address, but then it evolved into any time.

Ms. SAFAVIAN. Well, I don't—I don't believe I mentioned—I said before in my question.

EXAMINATION BY MS. SAFAVIAN:

Question. What I'm interested in is if you recall the President speaking with you on this day, which is March 11th, 1995 about Mr. Johnny Chung and this delegation of Chinese businessmen's attendance at the radio address.

Answer. After the radio address, as was often the case, once all the guests had left the White House or left the oval office area, you know, I would be standing out there, as sometimes would Nancy or others. And I have—I can recall the President asking who this group of Chinese businessmen were. And I don't specifically recall what he asked. But I—I have a vague recollection that he asked who they were, where their request came from, why they were there.

Question. And who was that request directed to from the President?

Answer. I don't specifically recall. Probably Ms. Hernreich or myself because that was within our scope of responsibility. And, again, I don't specifically recall the conversation or what specifically was said. But I believe that the President asked, you know, where—why these—or who these people were, why they were there and that, while I don't specifically remember what I answered, I assume that I would have said where the request had come from, which was they came through the DNC. It was a request from the Chairman's office. And I believe that the President asked to, if I knew who they were or someone at the White House such as someone in maybe the National Security Office knew that they were there.

And while I don't, again, specifically remember what I said, I assumed that I probably said I will make sure that they do. And I believe that he, and as this note indicates, wanted us to ensure that we knew who these people were before their photographs were sent out because they, as you know, had been at the radio address and had their picture made with the President. So I believe that he was concerned that, before we sent out the photographs, that we knew exactly who these people were. And at that point, I could not answer that question for the President.

Question. Is it all that you recall him saying?

Answer. Yes.

Question. Okay. And at that point——

Answer. I said I don't specifically recall exactly what he said. I think that was the gist of his concern. But I don't specifically recall the words that he used.

Question. And at the time the President asked you about

this——

Answer. I did not indicate that it was me. I said it must have been Nancy Hernreich or myself, because we both—this would have fallen into both of our scopes of responsibility.

Question. Okay. I thought you had testified that you couldn't respond to the question when he asked whether the—whether anything was known about these individuals.

Answer. I believe that I did. But I'm not exactly sure.

Question. Okay. At that point, then, the—these individuals on what has been marked as KC-number 3, the NSC had not been notified that these individuals were going to attend the radio address.

Mr. WILSON. You mean in advance of the radio address?

Ms. SAFAVIAN. In advance of the radio address.

The WITNESS. I don't believe that they had, but I'm not sure. But I don't believe that I had notified them.

EXAMINATION BY MS. SAFAVIAN:

Question. Is that something that you would have done?

Mr. WILSON. Wait. Can you just ask that question a different way. You said you asked if it was something she did. She said she doesn't think she did. And then you asked if it was something she would have done. Can you just rephrase that or actually—the important question is whether Kelly understands what you mean.

The WITNESS. I don't quite understand what you—what you mean. If you restate that or clarify.

EXAMINATION BY MS. SAFAVIAN:

Question. Sure. Was it one of your responsibilities or one of your job responsibilities to have asked the NSC prior to individuals attending the radio address to look into their backgrounds or——

Answer. No.

Question. That would not have been something that you would have been responsible for doing?

Answer. We did not look into backgrounds of people who had attended the radio address. No. I believe that this request—I assume this request would have been sent to the NSC, because obviously these were individuals from China from another country.

Question. And when you—if you had other individuals from other countries attend radio addresses, is that something that somebody in your office would have notified the NSC prior to their attendance they radio address?

Answer. I don't specifically recall having other individuals from foreign countries attend radio addresses, in which case it would have called upon us to tell someone—I mean the President—I should clarify that as the President has a couple of friends from—a friend from Oxford, who's from Germany, but he's a personal friend of the President's that we would not have told the NSC about.

Question. Are you saying you don't ever recall foreigners being at radio addresses, or are you saying you don't recall checking out foreigners with the NSC?

Answer. I don't recall checking out foreigners with the NSC.

Question. Okay. And just to clarify, was there—is there somebody else besides yourself in the office who—whose responsibility it would have been to contact the NSC if someone from a foreign country was going to attend a radio address that you know of.

Answer. I don't know of anyone else.

Question. Okay. Can you tell me what happened after the President inquired about these individuals? Did you take any action after that?

Answer. Again, I have—I believe that I would have responded to his inquiry. And I have a vague recollection that maybe I took the list of names to Ms. Soderberg or to Tony Lake's office to say these people have been in the radio address. You know, is there a problem with any of the names? Do you know who these people are. But I don't specifically recall what I did on that day.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall who you would have contacted at the NSC?

Answer. On the morning of the radio address?

Question. No. I am sorry. I thought we determined that you did not contact the NSC on the morning of the radio address.

The WILSON. I don't think that is what she testified.

The WITNESS. No.

The WILSON. Is it possible to have the reporter read back her answer to that question?

Ms. SAFAVIAN. I don't think it was a specific question.

The WITNESS. The prior question that I just responded to.

The WILSON. She was testifying about, in response to your question, about what Kelly did subsequently with respect to the President's concern, or some question like that.

The WITNESS. Uh-huh. What happened that morning.

The WILSON. I am not sure she specified it as being that morning. But if we could just get the question and answer read back then we will all be on the same page.

[The reporter read back as requested.]

The WITNESS. Morning. That's where we were.

EXAMINATION BY MS. SAFAVIAN:

Question. So you did something that morning, or you——

Answer. I said I did not specifically recall, but I think that I may have responded to the President's inquiry.

Question. The morning——

Answer. At that time.

Question. The morning of that radio address on March 11th, 1995?

Answer. I believe I may have.

Question. Okay. And do you recall who you would have contacted at the NSC?

Answer. I just.

Mr. MCLAUGHLIN. That's a weird question because you are asking it in the would have form. Why don't you reconsider the way to get a—a proper way to get the information you are looking for, counsel?

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall who you contacted at the NSC?

Answer. I just stated that I may have contacted Ms. Soderberg, Mr. Lake or someone in their office but, no, I do not specifically recall that morning.

Question. I have just handed you what—a document that is Bates Stamp EOP005438, that is an e-mail from Melanie B. Darby to Rosanne Hill, Stanley Roth and Robert Suettinger.

The date of that is April 7th, 1995. Am I reading that correctly?

Answer. Yes.

Question. Why don't you go ahead and read that e-mail.

Mr. MCLAUGHLIN. Have you seen this document before?

The WITNESS. No.

Okay. I have read it.

EXAMINATION BY MS. SAFAVIAN:

Question. Okay. Do you know who Melanie B. Darby is?

Answer. I assume it's Brook Darby, who works at the NSC, but Melanie I have never heard Melanie B. Darby.

Question. Okay. Do you know a Brook Darby at the NSC?

Answer. Yes.

Question. Is she somebody that you contacted regarding the President's concern of Johnny Chung and these individuals from China?

Answer. I may have, yes.

Question. Would anybody else in your office have contacted the NSC besides yourself?

The WILSON. You are asking her to speculate?

Mr. MCLAUGHLIN. It's a weird question, counsel. Would have? After she states that she may have contacted somebody you are asking if there is anybody else who would have contacted. I don't think you have laid any kind of a proper predicate or foundation to start going into questions like that.

Furthermore, you are the one who said the committee is not interested in speculation so I would think you would want to ask a more carefully constructed question.

EXAMINATION BY MS. SAFAVIAN:

Question. Can you answer the question?

Answer. People at the White House on a daily basis talked to every—I mean, it's a very broad, broad question.

Question. If you look at the third full paragraph down, it states, "It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list ASAP and give me your advice on whether we want these photos floating around? (FYI-these people are major DNC contributors and if we can give them the photos, the President's office would like to do so)."

Did I read that correctly?

Answer. Yes.

Question. You had stated that you believe that you did something, you contacted the NSC or did something about the President's request that morning of the radio address.

Answer. I believe so.

Question. Okay. That was March 11th, 1995.

Answer. Uh-huh.

Question. Do you have any knowledge as to why this e-mail requesting that information is dated April 7th, 1995?

Mr. WILSON. You are asking her why——

The WITNESS. It is dated that——

The WILSON [continuing]. Brook Darby dated it April 7th or why there isn't a date earlier? I am having a hard time. You are asking her to speculate as to why——

The WITNESS. It is dated——

The WILSON [continuing]. There isn't an earlier date on this?

EXAMINATION BY MS. SAFAVIAN:

Question. Do you recall contacting Brook Darby on April 7th, 1995, about this?

Answer. I am not saying that I never contacted Brook Darby about this, but I do not recall calling her on April 7th, 1995.

Question. Do you recall it being earlier than April 7th, 1995?

Answer. No.

Mr. MCLAUGHLIN. You keep saying it as if there was testimony that it happened. She may have, I think was her testimony.

The WITNESS. It would not have been unusual for me to call Brook Darby or—if this was a situation to follow up with her. I do not know when this occurred. I mean, you are asking me to recall something that was several years ago and to recall dates.

I just—I wish I could do that for you. I wish that I could remember everything for you.

Mr. MCLAUGHLIN. Was Brook Darby a contact person at the NSC?

The WITNESS. Yes. She—it is my understanding that she worked for Nancy Soderberg who was like——

Mr. MCLAUGHLIN. Can we pause? There is somebody else in the room here. Can we go off the record?

[Recess.]

Ms. SAFAVIAN. Could you read back the last question?

[The reporter read back as requested.]

The WITNESS. Can I clarify my answer?

EXAMINATION BY MS. SAFAVIAN:

Question. Sure.

Answer. I mean, this is not my e-mail. I did not send this e-mail so I don't know why the date would or wouldn't have been earlier or later. Let's start again.

Question. Do you have any recollection of contacting Brook Darby either on April 7th, 1995, or a day or two before

April 7th, 1995?

The WILSON. Why don't you ask her just if she has a recollection of talking to Brook Darby on this subject, because you are going to get hung up if you ask her about specific dates. Would that work for you?

Ms. SAFAVIAN. That's fine. I thought we had covered that earlier.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you have any recollection of speaking with Ms. Darby about these individuals?

Answer. I don't recall a specific conversation, but it would not have been unusual for me to talk to Ms. Darby, and if I was trying to figure out what to do with these photographs as the e-mail indicates Nancy was trying to figure out what to do with these photographs, so it would not have been unusual for me to have contacted Ms. Darby to check up on them and see where—what we should do with them.

Question. Okay. And you testified that you have never seen this document before?

Answer. No, I have never seen it.

Ms. SAFAVIAN. Before I forget, let me mark that as Exhibit KC–4.

[Crawford Deposition Exhibit No. KC–4 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Let me hand you now another e-mail. This time it is from Robert Suettinger. It is also dated April 7th, 1995. And if you would just go ahead and take a moment to take a look at that.

Answer. Okay.

Ms. SAFAVIAN. Just so the record is clear, this document we are looking at is EOP 005439, which I will mark as Exhibit KC–5.

[Crawford Deposition Exhibit No. KC–5 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Crawford, have you ever seen this document before?

Answer. I don't believe I have ever seen this, no.

Question. Do you recall or have any recollection of Ms. Darby contacting you in response to the White House's request to look into the background of these individuals?

Answer. I am sorry. Will you repeat the question again?

Question. Sure. Do you recall Ms. Darby contacting you, in response to your office or the White House request for the NSC to look into the backgrounds of these individuals?

Answer. I vaguely recall her—yes, her contacting me and telling me some of what is in here, but I don't think I have seen this document.

Question. Okay. Do you recall when she would have contacted you?

Answer. No.

Question. Okay. Was it by correspondence or by telephone? Do you recall how she contacted you?

Answer. I don't remember.

Question. And can you tell me what she said?

Answer. I don't recall specifically, although—although, I mean, again, in this situation I have heard press accounts of an e-mail saying that, you know, Johnny Chung was—some of this language that was in here. So I am not sure if it is from my knowledge of talking with Brook or from my, you know, hearing other accounts of what this e-mail said. But some of it sounds familiar.

Question. Do you recall—first of all, do you know—we will just go forward a little bit. Do you know whether the White House released the photos of Johnny Chung and the Chinese delegation with the President?

Answer. I don't know for sure whether they were released or not, no. I don't remember sending them out, but I am not saying that they were or weren't sent out.

Question. Okay. Do you recall whether or not you would have waited to hear from the NSC to make the decision whether to send these out, is that something that your office would have done?

Answer. I would have waited probably.

Question. Okay.

Answer. That would have been my normal practice, if I had made an inquiry about this, then I would have followed up, as this indicates.

Question. Okay. I know you say you don't recall exactly what Ms. Darby said to you. You just have a recollection about some of these items in this e-mail. Do you recall whether her advice to you was to release the photos or not to release the photos?

Answer. I don't recall. But I assume that——

Mr. WILSON. I caution you not to assume.

The WITNESS. Okay.

Mr. WILSON. If you want to talk about your normal practices, that's fine.

The WITNESS. I don't recall.

Mr. WILSON. I don't want anyone to suggest that something you are assuming or speculating about is something that actually happened.

Mr. MCLAUGHLIN. I am sorry. Could we go off the record?

[Off the record.]

EXAMINATION BY MS. SAFAVIAN:

Question. Back on the record. Do you recall having a conversation with Ms. Hernreich about whether to release these photos to Johnny Chung?

Answer. I am not saying that I did or didn't have a conversation, but I don't recall a specific conversation, but I am not saying whether one did or didn't occur. I just don't recall.

Question. Okay. Let me show you a memorandum dated March 28th, 1995, from Betty Currie. If you will just take a look at that real quick.

Answer. I don't quite understand it.

Question. First of all, have you seen this document before, this memo?

Answer. No.

Question. Do you know who Betty Currie is?

Answer. Yes.

Question. Who is she?

Answer. She is the President's secretary.

Question. Okay. Do you know who this John is that it seems to be addressed to?

Answer. Huh-uh.

Question. Does John Frieburg mean anything?

Answer. Jonathan Frieburg?

Question. Jonathan Frieburg, does that mean anything to you?

Answer. Yes.

Question. Who was that?

Answer. He was an intern in our office.

Question. Was there anything in particular that he did which he would get a memo from Betty Currie about?

Answer. I don't understand. I am sorry. I don't quite understand your question.

Question. You said he was an intern in the President's office?

Answer. In the President's office. He worked for me.

Question. I am sorry? He worked for who?

Answer. He worked with me.

Question. He worked with you?

Answer. Uh-huh.

Question. Was he also involved in assisting to prepare for the radio addresses of the President?

Answer. I mean, as much as he sat next to me and may have accepted a phone call or two or worked with the pictures afterwards, but he did not have a primary role.

Question. Okay.

Answer. But I—I mean, do you—do we know that that is who this was to?

Question. It doesn't state so—it doesn't say on the memo.

Answer. I mean, pardon, but it could have been the number one—I mean—no one called it——

Mr. WILSON. It could be anything.

EXAMINATION BY MS. SAFAVIAN:

Question. This is a redacted copy and we can only do the best with what we have got.

Answer. I won't speculate.

Question. That's fine. Looking at the paragraph, the only paragraph, that is still on the memo, it states, Ceandra Scott called. She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the radio address. Apparently they were in Maggie's office when the request came, and Maggie said she didn't know but to contact DNC.

Answer. But I don't understand the second sentence. Apparently they were? Who is "they"?

Question. Well, I was going to ask you, do you know?

Answer. Do I understand this? No.

Question. Do you know what this is in reference to?

Answer. No.

Mr. MCLAUGHLIN. Just so we are clear, this reference is to you; it is not from you; you have never seen it?

The WITNESS. I have never seen it and I would not comment on it because it doesn't make any sense. I mean, I am sorry.

I don't understand it. I shouldn't say it doesn't make sense. I don't understand it.

EXAMINATION BY MS. SAFAVIAN:

Question. Looking at this does not—you are unable to shed any light?

Answer. Speculate, I am unable to even speculate——

Question. Okay.

Answer [continuing]. What this is.

Ms. SAFAVIAN. Since we did discuss it, let me mark that as KC–6.

[Crawford Deposition Exhibit No. KC–6 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Crawford, do you recall receiving any phone calls from individuals in the First Lady's office or somebody at the DNC asking about whether or not the White House was going to release these photos of Johnny Chung and the Chinese delegation?

Mr. WILSON. Are you talking about phone calls from the First Lady's office?

Ms. SAFAVIAN. From the First Lady's office or the DNC.

Mr. MCLAUGHLIN. That's a compound question. Why don't you ask her one at a time?

Mr. WILSON. If you can answer.

The WITNESS. I don't have specific—I mean, I dealt with maybe 50 to 100 radio addresses and there were 50 to 100 people in every radio address and there were pictures from all of them. I don't have a specific recollection. It would not be unusual that people would call and say, hey, can I pick up so and so's pictures; can I get this? It would not be unusual. I am not telling you that it never happened but I don't have a specific recollection of a specific call asking for these specific pictures.

EXAMINATION BY MS. SAFAVIAN:

Question. Let me show you a letter from Johnny Chung to Maggie Williams dated April 5, 1995; if you could just go ahead and take a quick look at that.

Answer. Uh-huh.

Question. Do you recall Maggie Williams ever contacting you or anybody else in your office about the status of these photographs?

Answer. Again, I just—I think I just answered the question. I do not have a specific recollection of a contact about these specific photos, but I cannot sit here today,

three years later, and tell you that a conversation did or did not occur. I dealt with hundreds of photographs and hundreds of requests to get these photographs.

Mr. MCLAUGHLIN. So after viewing this letter, which is neither to you nor from you nor mentions you, your answer is still the same as it was before?

The WITNESS. Yes.

Mr. MCLAUGHLIN. This document does not refresh your recollection?

The WITNESS. No.

Ms. SAFAVIAN. Let me mark that as KC No. 7.

[Crawford Deposition Exhibit No. KC–7 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Crawford, I am now handing you a fax cover sheet from Johnny Chung to Carol Khare. The subject is Photo. In the comments it says, quote: The White House assures me that you now have the pictures. Hurray. If you don't, give me a call. Have a good trip.

Does this refresh your recollection at all that the White House released these photographs to Johnny Chung?

Answer. No, it does not refresh my recollection. I don't know who Carol Khare is.

Ms. SAFAVIAN. Okay. Let me mark that as Exhibit KC No. 8.

[Crawford Deposition Exhibit No. KC–8 was marked for identification.]

Mr. MCLAUGHLIN. Of course the document speaks for itself but it says that you may have the pictures. It also says, if you don't. So I don't think that this document provides any indication one way or the other. It is a uniquely unhelpful refreshing device.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Crawford, do you recall when in July you left the President's office? I know you said it was July of 1995.

Answer. I don't. I can get the date for you but I don't specifically recall what—when it was. I think it was July.

Question. Okay. Let me—because we don't know the exact date, let me see if you have any knowledge about this next exhibit, which is—includes several pages. The first page is an AISI fax cover page from Betty Currie for Irene from Johnny Chung.

If you will just go ahead and take a look at the 5 pages that are attached to this.

Ms. Crawford, do you recall ever seeing this document before?

Answer. No.

Question. Do you have any knowledge of Johnny Chung making a request to Betty Currie of the President providing him with a credential letter?

Answer. I have no knowledge.

Question. Would you have ever written any correspondence on behalf of the President in your duties as staff assistant?

Answer. No, I did not write correspondence from the President in my duties.

Question. Who normally would do that, do you know?

Mr. WILSON. Who?

Mr. MCLAUGHLIN. Who normally would what?

Mr. WILSON. Who normally wrote any correspondence?

Ms. SAFAVIAN. Yes, it is very general.

EXAMINATION BY MS. SAFAVIAN:

Question. Who normally would write correspondence?

Answer. The correspondence department or the personal correspondence department would normally write correspondence for the President

Ms. SAFAVIAN. Okay. Let me just mark that as Exhibit KC No. 9.

[Crawford Deposition Exhibit No. KC–9 was marked for identification.]

Ms. SAFAVIAN. If you will just give me a minute, we may be about done.

The WITNESS. Good.

[Discussion off the record.]

EXAMINATION BY MS. SAFAVIAN:

Question. Back on the record. Ms. Crawford, you had testified earlier that the President expressed concern about whether to release these photos to these individuals who were from China. Do——

Answer. Can I just clarify? He expressed concern, did we know who these people were. I believe part of the concern may have also been that he had had his picture

made with them, but I don't think he specifically told me what his exact concern was.

Question. Okay. Do you have any recollection of the President ever expressing concern or questioning any other individual's attendance at a radio address?

Answer. I don't specifically recall other instances but, like I said, the radio address was a time for his friends and family and staff members and their family members. So I don't believe that there was another instance that I can specifically recall, that there were people in the radio address that he did not know and that I did not know exactly who they were, or Nancy did not know exactly who they were.

Ms. SAFAVIAN. Okay. That's all I have, I believe. Minority counsel may have a few questions to ask you.

Mr. MCLAUGHLIN. Yes, I do want to go over something.

EXAMINATION BY MR. MCLAUGHLIN:

Question. I am sorry that the prior questioning has been so confused but I just want to walk through it.

Answer. I would just say it is very confusing.

Question. It has been very confusing. I am sorry about that. I just want to walk through this sort of sequence of events following the radio address and what you do and don't recall about them just so it is clear for the record.

Let me—without turning to any of the documents, can you just state your understanding of what, just—whatever way you think is appropriate, of what happened following the radio address that Johnny Chung attended and what steps you may or may not have taken?

Answer. Sure. As I mentioned, I recollect that the President seemed concerned that—as I have said, this radio address was a very informal gathering and that there were—it was an unusual group on this Saturday in that these businessmen from China were attending the radio address, and so the President, I believe, voiced his concern to me and/or Nancy, saying, who are these people? Do we know where they—you know, who requested their attendance?

And since I didn't have a really good answer, although I believe I said that the request came from the DNC, I believe he asked me and/or Nancy to check with Tony Lake or the National Security Council.

And I don't specifically recall what I did that morning, but I am basing what I am telling you on what I—normal practice if the President asked me to check something out, I assume I would have done it in a timely fashion.

Question. So was it a normal practice for you to contact Brook Darby if you had to have an interaction with the NSC? Would she normally be the person you would contact?

Answer. Yes. As we actually—when I got up to use the restroom, we were talking about this. But she is—it is my understanding that she was the assistant to the staff director, I think is what Nancy titled—Nancy Soderberg's title was. So she was sort of my counterpart at the NSC.

Question. And then would it be normal practice for the person that you contacted at the NSC to also be the person to contact you back and relay whatever information had to be relayed back from the NSC?

Answer. I am sorry. Can you state that again?

Question. It was a confusing question. I am falling into that trap.

If you contacted Brook Darby with a question, would it be normal practice for Brook Darby to contact you back with whatever information had to be passed back?

Answer. Yes. Yes.

Question. Okay. Can I direct your attention to the exhibit that's been marked KC–4?

Answer. Uh-huh.

Question. If I recall your earlier testimony, you may have contacted somebody at the NSC the day of the radio address or shortly thereafter?

Answer. Uh-huh.

Question. Okay. Turning to Exhibit 4, the second sentence of the third full paragraph states, Johnny Chung, one of the people on the list, is coming to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures.

Is it possible that you might have made a second call to Brook Darby or somebody else on the NSC staff in light of the fact that Johnny Chung was coming in in person, or according to this document was coming in in person?

Answer. Absolutely. That's very likely.

Question. It is entirely possible you made one contact?

Answer. Yes.

Question. You made a second contact later?

Answer. Yes.

Question. You don't recall specifically?

Answer. No.

Question. But it is possible?

Answer. It is very possible.

Mr. WILSON. You need to let him finish the question before you answer.

The WITNESS. I am sorry.

Mr. MCLAUGHLIN. That's all I have. I want to thank you on behalf of the Minority members of the committee. We want to thank you for the time to speak with us.

The WITNESS. Absolutely.

Ms. SAFAVIAN. That's all we have. Thank you.

The WITNESS. Great. Thank you.

[Whereupon, at 11:55 a.m., the deposition was concluded.]

[The exhibits referred to follow:]

REP 0 UAV07705

RUN DATE 93/02/01

VISITOR SUMMARY FOR 93/01

VISITOR		VISITEE	UIN	TIME	DATE	LOC	ROOM	REQUESTOR		DATE	TO-	POA
CHUNG	JOHNNY	DUNN	U14327	1345	930111	O	115	DUNN	B	321654	1347	002
CHUNG	JOHNNY	MIDDLETON	U15023	1100	930113	O	176	MIDDLETON	M	000020	1044	001
	[illegible]	JOHNSON	[illegible]	0740	930123	O	87	JOHNSON		001561	0738	002
CHUNG	JOHNNY	DUNN	U21312	1305	930130	O	115	DUNN	O	000000	1308	002
	[illegible]	BARNEY	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]					
CHUNG	JOHNNY	FRANKFURTER	U13496	0749	930110	W	100/EW	FRANKFURTE	M	******	****	***
CHUNG	JOHNNY	MIDDLETON	U14998	1700	930112	O	176	MIDDLETON	M	001553	1704	002
	MARC	ROTHMAN	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]					

COMMITTEE ACCESS

EXHIBIT
KC 1

REDACTED

EOP 005039

SEARCH: MARCH 1995

PT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
950324	CHUNG	JOHNNY	U42871	RYAN	RYAN	100	9:46	00102	0:00	
950308	CHUNG	JOHNNY	U33371	BAILEY	BAILEY	174	10:15	00202	10:18	
950309	CHUNG	JOHNNY	U36035	RYAN	RYAN	100	11:37	00102	0:00	
950313	CHUNG	JOHNNY	U38788	RYAN	RYAN	100	13:21	00101	0:00	
950313	CHUNG	JOHNNY	U37545	RYAN	RYAN	100	13:40	00101	0:00	
950309	CHUNG	JOHNNY	U36174	RYAN	RYAN	100	14:11	00102	0:00	
950310	CHUNG	JOHNNY	U36798	TARMEY	TARMEY	100	14:17	00102	0:00	
950314	CHUNG	JOHNNY	U38268	RYAN	RYAN	100	14:37	00102	14:38	
950313	CHUNG	JOHNNY	U37718	RYAN	RYAN	100	17:07	00102	0:00	

COMMITTEE ACCESS

EOP 008683

VISITOR		VISITEE											
CHUNG	JOHNNY	BAILEY	[illegible]	[illegible]	950309	[illegible]	[illegible]	BAILEY	B	000060	1015	002
CHUNG	JOHNNY	RYAN	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	RYAN		156690	1137	001
CHUNG	JOHNNY	RYAN	036174	1600	950309	0	100	RYAN	M	434500	1411	001
CHUNG	JOHNNY	TARNSEY	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	TARNSEY	M	012630	1417	001
CHUNG	JOHNNY	POTUS	037756	1415	950310	0	100	CRAWFORD		******	****	***
CHUNG	JOHNNY	RYAN	037050	1519	950311	W	WO	RYAN	M	545410	1340	001
CHUNG	JOHNNY	RYAN	037945	1570	950313	0	100	RYAN		302515	1707	001
CHUNG	JOHNNY	RYAN	037716	1710	950313	0	100	RYAN		321321	1457	001
CHUNG	JOHNNY	RYAN	038266	1500	950314	0	100	RYAN	E	789879	1321	001
CHUNG	JOHNNY	RYAN	038780	1315	950315	0	100	RYAN	E	000531	0946	001
CHUNG	TONY	[illegible]	042471	1905	950324	0	100					

COMMITTEE ACCESS

REDACTED

EOP 005038

SEARCH: MAY 1995

APPT. DATE	LNAME	FNAME		REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
950519	CHUNG	JOHNNY	U66214	SHULMAN	MATSUI	450	14:34	00101	0:00	
950504	CHUNG	JOHNNY	U60497	RYAN	RYAN	100	16:05	00101	18:12	
950426	HUANG	JOHN	U58071	KANG	KANG	474	8:54	00102	0:00	
950421	HUANG	JOHN	U54712	RAMSEY	RAMSEY	472	10:13	00401	0:00	
950402	HUANG	JOHN	U46398	WEAVER	WEAVER	131	14:11	00201	0:00	
950519	HUANG	JOHN	U66214	SHULMAN	MATSUI	450	14:36	00101	0:00	
950502	HUANG	JOHN	U59162	RAMSAY	CLAUSSEN	476	15:00	00401	0:00	
950511	HUANG	JOHN	U63107	EDER	EDER	180	15:44	00401	0:00	
950427	HUANG	JOHN	U57128	EDER	EDER	122	15:52	00401	0:00	

COMMITTEE ACCESS

EOP 008680

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD	TO
930519	AHN	MI		U66214	SHULMAN	MATSUI	450	14:34	M0101	0:00	

COMMITTEE ACCESS

930324	CHUNG	JOHNNY		U68274	RYAN	RYAN	100	11:01	00102	14:16	
930303	CHUNG	JOHNNY		U69809	RYAN	RYAN	100	13:28	00102	13:42	
930519	CHUNG	JOHNNY		U66622	RYAN	RYAN	100	14:04	00101	14:33	

EOP 003717

789

COMMITTEE ACCESS

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITED	ROOM	ARRIVE TIME	POST	TOD	TO
930721	CHUNG	JOHNNY		U90915	RYAN	RYAN	100	10:34	00101	15:20	
930710	CHUNG	JOHNNY		U83730	RYAN	RYAN	100	15:11	00101	16:04	
930711	CHUNG	JOHNNY		U86509	RYAN	RYAN	100	16:34	00101	17:23	
930710	HUANG	JOHN		U83773	EHER	HOEK	190	16:09	00102	17:40	

EOP 003713

REPORT NO DAV07705 PAGE N

RUN DATE 95/08/01 VISITOR SUMMARY FOR 95/07

VISITOR		VISITEE	VIN	TIME	DATE	LOC	ROOM	REQUESTOR	BADGE	TOA	POA
CHENG		POTUS									
CHENG	JOHNNY	POTUS	U05990	1830	950711	W	STATE F	WIDDESS	K ******	****	***

790

COMMITTEE ACCESS

REDACTED

EOP 005035

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVAL TIME	HOST	TOD	TJ
930925	CHUNG	JOHNNY		U13993	RYAN	RYAN	100	10:36	H0101	12:02	
930926	CHUNG	JOHNNY		U14493	RYAN	RYAN	100	11:32	H0102	13:49	
930925	CHUNG	JOHNNY		U14228	RYAN	MCCOY	101/EW	16:34	A0101	17:22	
930914	HUANG	JOHN		U10298	SCHIFF	SCHIFF	WW	12:17	A0402	13:25	
930913	HUANG	JOHN		U10015	CAMERON	HERNREICH	WW	17:15	A0402	18:05	
930914	HUANG	JOHN		U10165	WEAVER	WEAVER	WESTWIN	9:23	A0402	10:40	

COMMITTEE ACCESS

RL NO: WAV077B5 PAGE

RUN DATE 98/11/02 VISITOR SUMMARY 10/01/98 TO 10/10/98

VISITOR			VISITEE		UIN	TIME	DATE	ROOM	REQUESTOR	DOU	TOA	S
CHUNG	JOHNNY		RYAN		UZ2080	1030	981016	100	RYAN	E	1030	
CHUNG	JOHNNY		RYAN		UZ3694	1320	981019	100	RYAN		1343	
CHUNG	JOHNNY		RYAN		UZ3680	1600	981019	100	RYAN		1627	
CHUNG	SUK	K	[illegible]		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]		[illegible]	
CHUNG	JOHN	L	PHILIPS		UZ0122	1130	981028	47H	PHILIPS	J	[illegible]	
CHUNG	PATRICIA	T	PHILIPS		UZ0122	1130	981026	47H	PHILIPS	J	[illegible]	
CHUNG	JOHN	L	BROWN		UZ0197	1130	981028	578	BROWN	B	1133	

COMMITTEE ACCESS

REDACTED

EOP 005032

17 09:37:32 AM

APPT. DATE	LNAME	FNAME	DOB	CODE	REQUESTED BY	VISITEE	ROOM	ARRIVE TIME	POST	TOD
951208	CHUNG	JOHNNY		U40564	MCCOY	MCCOY	101/EW	14:04	00102	14:32
951221	HUANG	JOHN		U45449	HEISTAD	SCOTT	110	14:24	00101	15:07
951218	HUANG	JOHN		U44096	EDER	HATSUI	122	15:47	00101	17:31
951218	HUANG	JOHN		U43718	CAMERON	POTUS	WW	9:39	A0401	10:

COMMITTEE ACCESS

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

February 27, 1995
(Via Fax)

Mr. Richard Sullivan
DNC
(202)863-7187

Dear Richard,

How are you? I am going to need your help again. I am bringing with me the delegation from China. This is a group of very important and powerful business leaders from China. They will be in D.C. from 3/7 to 3/11 and will be staying at J.W. Marriott, (202) 393-2000, 1331 Pennsylvania N.W. Washington DC. Enclose please find the name list and their personal information.

As I have mentioned on the phone, their main purpose would be as follows:

1.) Meet President Clinton — Meet Don Fowler

2.) Meet Vice President Al Gore

3.) Have lunch at the Mess (White House)

4) Tour the White House

5.) Meet Secretary Ron Brown

Please help me make arrangements accordingly. Thank you in advance for all your help. I will see you soon.

Sincerely,

Johnny Chung
Chairman/CEO

JC:iw
Encl.

EXHIBIT
KC 2

DNC 3233326

3/13 cc: Nancy Sodrel
Someone from
DWC asked
to let Carla K
Robin Gibb

Name List of Delegation

1.) Hongye Zheng 08-18-29
Chairman, China Council for the Promotion of International Trade (CCPIT)
Chairman, China Chamber of International Commerce (CCOIC)

2.) [redacted] YAN SANZHONG 10-26-41
President, China Petro-Chemical Corporation

3.) Jichun Huang 01-17-32
Vice President, China International Trust and Investment Corporation

4.) Renzhong Wang 05-19-32
Vice Chairman & President, Shanghai AJ Shareholding Corporation

5.) James J. Sun 10-28-62
Young Entrepreneur of Xinjiang, self made multi-millionaire, Urumqi Taihe Industry Co.

Entourage

1.) Jianiang Yu 02-22-65
Chief, American & Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

~~2.) Guxin Tang~~
~~Secretary to Mr. Huaren Shang~~

~~3.) Jie Tang~~
~~Interpreter, SINOPEC~~

~~1 18 38~~
~~William Gao 20~~

AISI Representatives

1.) Johnny Chung - Chairman/CEO 06-09-54

~~2.) Art Liang - Managing Director/Executive V.P.~~

Before photos are
taken we need
to know if we
should put them
and them
NH

EXHIBIT
KC 3

EOP 063488

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 10:12 am
SENDER: Darby, Melanie B.
SUBJECT: Subject: PHOTOS? [UNCLASSIFIED]
TO: Hill, Roseanne M.
Roth, Stanley O.
Suettinger, Robert L.

CC: NO CC's on THIS MESSAGE

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):

HONGYE ZHENG
Chairman, China Council for the Promotion of Int'l Trade (CCPIT)
Chairman, China Chamber of Int'l Commerce (CCOIC)

YAN SANZHONG
President, China Petro-Chemical Corporation

JICHUN HUANG
Vice President, China Int'l Trust and Investment Corp.

RENZHONG WANG
Vice Chairman and President, Shanghai AJ Shareholding Corp.

JAMES J. SUN
Young Entrepeneur of Xinjiang, self-made multi-millionaire, Urumqi Talhe Industry Co.

JIANIONG YU
Chief, American and Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

JOHNNY CHUNG
Chairman & CEO, AISI

Thanks very much for your help.

EXHIBIT
KC 4

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 11:24 am
SENDER: Suettinger, Robert L.
SUBJECT: Subject: RE: PHOTOS? [UNCLASSIFIED]
TO: Darby, Melanie B.

CC: Roth, Stanley O.

The joys of balancing foreign policy considerations against domestic politics. . . I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the DNC, who am I to complain? Neither do I see any unalloyed benefit, either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide (present or former) Chinese officials, with the possible exception of James Y. Sun, "young entrepreneur and self-made millionaire." Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

But a caution – a warning of future déjà vu. Having recently counselled a young intern from the First Lady's office who had been offered a "dream job" by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler, and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials. My concern is that he will continue to make efforts to bring his "friends" into contact with the POTUS and FLOTUS – to show one and all he is a big shot, thereby enhancing his business. I'd venture a guess that not all his business ventures – or those of his clients – would be ones the President would support. I also predict that he will become a royal pain, because he will expect to get similar treatment for future visits. He will be persistent.

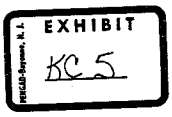
Bob

From: Darby, M. Brooke
To: @ASIA - Asian Affairs
CC: /R. Record at A1
Subject: PHOTOS? [UNCLASSIFIED]
Date: Friday, April 07, 1995 01:12 PM

An odd situation on which I need some guidance for the President's office asap.

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so).



MEMORANDUM

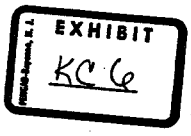
FROM: Betty Currie

DATE: March 28, 1995

Jon

2. Ceandra Scott called - She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the Radio Address. Apparently they were in Maggie's office when request came and Maggie said she didn't know, but to contact DNC -- I

NON-RESPONSIVE
MATERIAL
REDACTED



AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

April 5, 1995
(Via Fax 202 456-6244)

Margaret Williams
Assistant to the President and
Chief of Staff to the First Lady
The White House
Washington, D.C. 20506

Dear Ms. Williams,

I have an important issue here that needs your assistance. As you always know, I am 100% supportive of the First Lady's Office and I am always delighted to work with DNC at every occasion. The China Business Delegation led by Chairman Zheng Hongye met with President Clinton and took some pictures after the radio address on March 11, 1995. It's been over three weeks, I have not seen any of the pictures. I have learned from Mr. Richard Sullivan of DNC that the National Security Council is holding on to those pictures.

In my opinion, if we allow them to take the pictures with our President then we should be courteous enough to let them have the pictures. I am going to China next week and I do need to bring those pictures with me. I have run out of excuses to tell them why the pictures are taking forever. I really appreciate your help in solving this minor issue.

I look forward to seeing you this weekend at Mr. Steven Spielsberg's party. Thank you again for everything.

Sincerely,

Johnny Chung
Chairman/CEO
AISI

Thank you!

JC:iw

EXHIBIT
KC 7

DEMOCRATIC★NATIONAL★COMMITTEE

Donald L. Fowler
National Chair

Christopher J. Dodd
General Chair

OFFICE OF THE CHAIRMEN

PH 202-863-8121
FAX 202-863-8174

FAX COVER SHEET

DATE:_____ TIME:_____

TO: Johnny Chung

FAX:_____ # OF PAGES (including cover): 1

FROM: Carol Khare

SUBJECT: photo

IF YOU HAVE ANY TROUBLE WITH THIS TRANSMISSION,
PLEASE CALL _____ AT (202) 863-_____

COMMENTS: The White House assures me that you now have the pictures — hurray!! If you don't, give me a call. Have a good trip!

___ PLEASE VERIFY RECEIPT OF THIS DOCUMENT IMMEDIATELY

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. THIS MESSAGE MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS BELOW VIA THE U.S. POSTAL SERVICE. THANK YOU.

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EXHIBIT
KC8

Forward to ASC to show

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To: Betty Currie	From: IRENE for Johnny Chung
Date: 7-25-95 Time:	For Information Call: (310) 328-3883
Fax Number: 202-456-2883	Total Pages Including This Cover Page: 3

Please have President Clinton write me a credential letter for my trip to China. I have enclosed a letter dated Oct. 3, 1994 which I can not use for this trip because its for Taiwan.

Thank you very much for your help!

PLEASE STAFF

EXHIBIT
KC9

EOP 005053

Building The U.S. Fax Highway Today

2771 Plaza Del Amo Suite 809, Torrance CA 90503

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny,

It was good seeing you again last week. I want to thank you for the essential role you play in bridging our diverse communities and your help with my Administrtion. Your efforts in helping to open communications between China and the United States are much appreciated.

Congratulations on a job well done.

Sincerely,

EOP 005054

803

BILL CLINTON

October 3, 1994

Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo
Suite 809
Torrance, California 90503

Dear Johnny:

Please let me extend my appreciation to you for your participation in my birthday celebration with your family on August 2nd. Your outstanding support and dedication to this Administration is benefiting Americans across the nation.

I also want to express to you how essential your role has been in helping to bridge our country' diverse communities. Your efforts to open lines of communication between our Administration and the Taiwanese American community are much appreciated.

Again, thank you for your support and for a job well done.

Sincerely,

Bill

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To: Betty Currie	From: Johnny Chung
Date: 7-5-95 Time:	For Information Call: (310) 328-3883
Fax Number: 202-456-2883	Total Pages Including This Cover Page: 2

Reference letter from DNC. Thank You.

EOP 005056

Building The U.S. Fax Highway Today

2771 Plaza Del Amo Suite 809, Torrance CA 90503

DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. I
General

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny:

Thank you for stopping by my office; I really enjoyed meeting your guests. You are to be commended for your efforts to build a bridge between the people of China and the United States. I want to express my appreciation to you for being a friend and a great supporter of the DNC.

Good luck on your trip to China and please keep me informed. Thank you.

Sincerely,

Donald L. Fowler

DLF/aed

Name List of Delegation

1.) **Hongye Zheng**
Chairman, China Council for the Promotion of International Trade (CCPIT)
Chairman, China Chamber of International Commerce (CCOIC)

2.) **Huaren Sheng**
President, China Petro-Chemical Corporation

3.) **Jichun Huang**
Vice President, China International Trust and Investment Corporation

4.) **Renzhong Wang**
Vice Chairman & President, Shanghai AJ Shareholding Corporation

5.) **James J. Sun**
Young Entrepreneur of Xinjiang, self made multi-millionaire, Urumqi Taihe Industry Co.

Entourage

1.) **Jianlong Yu**
Chief, American & Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

2.) **Suxin Tang**
Secretary to Mr. Huaren Sheng

3.) **Jie Tang**
Interpreter, SINOPEC

AISI Representatives

1.) **Johnny Chung - Chairman/CEO**

2.) **Art Liang - Managing Director/Executive V.P.**

DNC 3233327

Resume

Zheng Hongye

Mr. Zheng Hongye was born in Harbin, Heilongjiang Province in September 1929. He was engaged in trade and economic affairs in the Northeast Region of China from 1947 to 1954; transferred to the China Council for the Promotion of International Trade(CCPIT) in 1955 and worked as Deputy Division Chief successively in the Department of Foreign Exhibition in China, Liaison Department and Department of Chinese Exhibitions Abroad; served as Commercial Councilor of the Chinese Embassy in Australia and then in Greece from 1973 to 1979; became Deputy Director and then Director of the Liaison Department of CCPIT in 1979; appointed Vice Chairman of CCPIT in 1981; served as Minister-Counsellor(Commercial) of the Chinese Embassy in Japan 1984; resumed his post as Vice Chairman of CCPIT after he returned from Japan in 1986; concurrently became Vice Chairman of the China Chamber of International Commerce(CCOIC) in 1988. He assumed the post as Acting Chairman of CCPIT and CCOIC since October 1989.

Mr. Zheng Hongye is a member of the Seventh and Eighth Chinese People's Political Consultative Conference, Chairman of the China International Economic and Trade Arbitration Commission, Chairman of the China Maritime Arbitration Commission, Chairman of the Economic and Trade Coordination Committee for the Two Sides of the Straits, Chairman of the Association of China Foreign Service Trade and a concurrent professor of Xiamen University. Mr. Zheng Hongye is also Chairman of the China Committee of the International Chamber of Commerce.

Sheng Huaren

Mr. Sheng Huaren, born in September 1935, is President of China Petro-Chemical Corporation, Chairman of China International United Petroleum and Chemicals Co. Ltd, and concurrently Vice Chairman of China-Korea Economic Council.

Mr. Sheng was born in Yancheng city, Jiangsu Province. He studied in Subei Cooperative Insititute for Cadres in Yangzhou city, Jiangsu Province in 1951. He used to be a statistician and plan-drafter in Subei General Cooperative Commune and the Finance and Econonmy Committee of Subei Administrative Office; apprentice, technician and deputy site director of Nanjing Construction Company; Deputy Director of the Long-term Planning Department in the Ministry of Combustible Chemical Industry and the Ministry of Petro-chemical Industry; Vice President of China Petro-chemical Corporation.

DNC 3233328

Huang Jichun

Mr. Huang Jichun, Director and Vice President of China International Trust and Investment Corporation(CITIC), was born in 1933. He graduated from the University of Northeast Technology, China in 1955 and attended the Executive Program in Business Administration(EPBA) of Columbia University, U.S.A. in 1989. Mr. Huang is acting also as a professor and senior engineer as well as the Executive Director of China Nonferrous Metals Society, a member of American Society of Metals and a member of Chinese Society of Investment.

In CITIC, Mr. Huang is in charge of investment and trade both at home and abroad as well as enterprise management.

Mr. Huang's professional capability is specifically excellent in the metal and material fields. He used to be responsible for the scientific and technical R & D, production management and foreign trade of nation-wide non-ferrous metals sector during 1983 to 1987 as Vice President of China National Non-ferrous Metals Industry Corporation. Mr. Huang was also heavily engaged in elaborating the long-term strategic plan for the scientific and technical development of the Chinese metallurgical industry while working in the Ministry of Metallurgical Industry from 1956 to 1982. He is very experienced in production, management and foreign trade and can manage English as a working language very well.

Wang Renzhong

7/1992-Present	Shanghai AJ Corporation, Shanghai Vice Chairman, President(C.E.O.)
11/1990-7/1992	Shanghai Patriotic Construction Corp. Vice Chairman, President
2/1986-11/1990	Shanghai Investment & Trust Corp. Board Director, Executive Vice President in charge of international trading, investment and other technology related business
1/1985-2/1986	Shanghai Investment & Trust Corp. Senior Vice President responsible for all international trading
2/1976-12/1984	Bureau of Aerospace Industry, Shanghai Director of Quality Assurance, Chief Production Engineer and Standing Member of Science and Technology Commission
3/1963-2/1976	Plant No.155 of the China Aviation Industry Ministry, Harbin

DNC 3233329

8/1952-3/1963	Plant No. 120 of the China Aviation Industry, Harbin Superintendent, Production Engineer
Technical Title:	Researcher
Education:	Graduate of the Yenching University, Beijing
Personal:	Born in China on May 1932, Married

DNC 3233330

Resume

James J. Sun

Mr. Sun was born on November 28, 1962 in Her Nan Province, China. He is the President of Xinjiang Taihe Enterprise Group Co. Ltd. and also a self made millionaire. He formed the Taihe Enterprise in 1990. Currently the Taihe Group consist of Taihe Real Estate Co. who's projects includes the four star Taihe Hotel in Urumqi, Taihe Kangle Developing Co. and Taihe Battery Co.

AISI Representatives

1.) **Johnny Chung** - Chairman/CEO

2.) **Art Liang** - Managing Director/Executive V.P.

3.) **Irene Wu** - Delegation Administrtor

4.) **George Liu** - Special Assistant to Chairman (East Coast)

5.) **David Chen** - Special Assistant to Chairman (Beijing)

6.) **Nancy Zhao** - Secretary to Chairman/CEO

DNC 3233332

[The deposition of Carol Khare follows:]

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
U.S. HOUSE OF REPRESENTATIVES,
Washington, DC.

DEPOSITION OF: CAROL KHARE

MONDAY, NOVEMBER 10, 1997

The deposition in the above matter was held in Room 2247, Rayburn House Office Building, commencing at 1:15 p.m.

Appearances:

Staff Present for the Government Reform and Oversight Committee: Jennifer Safavian, Investigative Counsel; Robert A. Rohrbaugh, Senior Investigative Counsel; Jason Hopfer, Majority Staff; Christopher Lu, Minority Counsel; and Michael J. Yeager, Minority Counsel.

For MS. KHARE:

W. NEIL EGGLESTON, ESQ.
EVAN J. WERBEL, ESQ.
HOWREY & SIMON
1299 Pennsylvania Ave., N.W.
Washington, D.C. 20004–2402

Ms. SAFAVIAN. Good morning. On behalf of the members of the Committee on Government Reform and Oversight, I appreciate and thank you for appearing here today. This proceeding is known as a deposition. The person transcribing this proceeding is a House reporter and notary public. I will now request the reporter place you under oath.

THEREUPON, CAROL KHARE, a witness, was called for examination by Counsel, and after having been first duly sworn, was examined and testified as follows:

Ms. SAFAVIAN. I would like to note for the record those present at the beginning of this deposition. My name is Jennifer Safavian, and I am the designated Majority counsel for the committee. I am accompanied today by Jason Hopfer, who is with the Majority staff and also with Bob Rohrbaugh, who is only going to be with us for a short time, I believe. Michael Yeager is the designated Minority counsel and he is accompanied by Christopher Lu.

Ms. SAFAVIAN. Ms., is it Khare.

The WITNESS. Khare.

Ms. SAFAVIAN. Ms. Khare is accompanied by Neil Eggleston and Evan Werbel.

Although this proceeding is being held in a somewhat informal atmosphere, because you have been placed under oath, your testimony here today has the same force and effect as if you were testifying before the committee or in a courtroom.

Mr. EGGLESTON. I must say, this is one of the most formal depositions I have ever attended, in a hearing room. Those of us in private practice think this is impressive.

Ms. SAFAVIAN. No comment on my part.

Mr. EGGLESTON. I'm sorry to interrupt you.

Ms. SAFAVIAN. You are interrupting my script.

If I ask you about conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and give me the gist or substance of any such conversation, to the best of your recollection.

If you recall only part of a conversation or only part of an event, please give me your best recollection of those events or parts of conversations that you recall. If I ask you whether you have any information upon a particular subject, and you have overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you do have such information and indicate the source, either a conversation or documentation or otherwise from which you derived such knowledge. Before we begin the questioning, I want to give you some background about the investigation and your appearance here. Pursuant to its authority under House Rules 10 and 11 of the House of Representatives, the committee is engaged in a wide-ranging review of possible political fund-raising improprieties and possible violations of law.

Pages 2 through 4 of House Report 105–139 summarizes the investigation as of June 19, 1997, and encompasses any new matters which arise directly or indirectly in the course of the investigation. Also, pages 4 through 11 of the report explain the background of the investigation. All questions related either directly or indirectly to these issues, or questions which have a tendency to make the existence of any pertinent fact more or less probable than it would be without the evidence are proper.

The committee has been granted specific authorization to conduct this deposition, pursuant to House Resolution 167, which passed the full House on June 20, 1997. Committee rule 20, of which you have received a copy, outlines the ground rules for the deposition. Majority and Minority counsel will ask you questions regarding the subject matter of the investigation. Minority counsel will ask questions after Majority counsel has finished.

After the Minority counsel has completed questioning you, a new round of questioning may begin. Members of Congress who wish to ask questions will be afforded an immediate opportunity to ask their questions. When they are finished, committee counsel will resume questioning.

Pursuant to the committees rules, you are allowed to have an attorney present to advise you of your rights. Any objection raised during the course of the deposition shall be stated for the record. If the witness is instructed not to answer a question or otherwise refuses to answer a question, Majority and Minority counsel will confer to determine whether the objection is proper. If counsel agree a question is proper, the witness will be asked to answer the question. If an objection is not withdrawn, the Chairman or a Member designated by the Chairman may decide whether the objection is proper.

This deposition is considered as taken in executive session of the committee, which means that it may not be made public without the consent of the committee pursuant to clause 2(k)7 of House Rule 11. You are asked to abide by the Rules of the House and not discuss with anyone, other than your attorney, this deposition, and the issues and questions raised during this proceeding.

Finally, no later than 5 days after your testimony is transcribed and you have been notified that your transcript is available, you may submit suggested changes to the Chairman. The transcript will be available for your review at the committee office. Committee staff may make any typographical and technical changes requested by you. Substantive changes, modifications, clarifications or amendments to the deposition transcript, submitted by you, must be accompanied by a letter requesting the changes, and a statement of your reasons for each proposed change.

Answer. letter requesting any substantive changes, modifications, clarifications or amendments must be signed by you. Any substantive changes, modifications, clarifications or amendments shall be included as an appendix to the transcript conditioned upon your signing of the transcript. Do you understand everything we have gone over so far.

The WITNESS. Yes.

Ms. SAFAVIAN. Do you have any questions about anything we have gone over?

The WITNESS. No.

Ms. SAFAVIAN. I will be asking you questions concerning the subject matter of this investigation. Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. If you don't understand a question, please say so and I will repeat it or rephrase it so that you understand the question. Do you understand that you should tell me if you don't understand one of my questions?

The WITNESS. Yes.

Ms. SAFAVIAN. The reporter will be taking down everything we say and will make a written record of the deposition. You must give verbal, audible answers because the reporter cannot record what a nod of the head or other gesture means. Do you understand you must give verbal answers?

The WITNESS. Yes.

Ms. SAFAVIAN. And not an uh-huh or huh-huh.

The WITNESS. Yes.

Ms. SAFAVIAN. If you can't hear me, please say so and I will repeat the question or have the court reporter read the question back to you. Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. Please wait until I finish each question before answering and I will wait until you finish your answer before I ask the next question. Do you understand this will help the reporter, as she cannot take down what both of us are saying at the same time?

The WITNESS. Yes.

Ms. SAFAVIAN. Your testimony is being taken under oath as if we were in court and if you answer a question, it will be assumed that you understood the question and the answer was intended to be responsive to it. Do you understand that?

The WITNESS. Yes.

Ms. SAFAVIAN. Are you here voluntarily or are you here as a result of a subpoena?

The WITNESS. I am here voluntarily.

EXAMINATION BY MS. SAFAVIAN:

Question. Will you please state your full name and spell it for the record?

Answer. My name is Carol Fick Khare, K-H-A-R-E.

Question. Have you ever used or been known by any other names?

Answer. No.

Question. Can you tell me what your date of birth and Social Security number are?

Mr. YEAGER. I object to the request for the Social Security number. I am not quite sure why you need her Social Security number, particularly in light of the fact that these depositions may be made public, and in the past, if the past is any indication of future practice, they may be posted on the Internet and Ms. Khare might have legitimate privacy concerns about that.

Mr. EGGLESTON. Well, I mean, I think that is a valid objection. I don't have any objection to giving it to you, but it is true all these get posted on the Internet and to have her personal data available to the committee for some reason, I am happy to give it to you separately, but I prefer not anybody who looks at the Internet have identifying characteristics, particularly as you are seeing more and more stories about people impersonating people using their Social Security number. I don't want to refuse to answer and withhold information from you, but I'm not sure why you need it in the deposition, so that any Internet viewer can see it, as opposed to me giving it to you.

Ms. SAFAVIAN. Well, first of all, let me correct something the Minority counsel has said. It is not customary we release all the depositions on the Internet. Like I said, this deposition is taken in executive session and it is not made public until the committee votes to make it public.

Secondly, we ask for the date of birth and Social Security number only for identification purposes, for documents we may receive in response to a subpoena. If it has, perhaps your name on it and we are not exactly sure it is you, if there happens to be another Carol Khare out there or the entire name is not there and the Social Security number is, it just helps us identify if this document, in fact, relates to you and we don't want you to get mixed up with anybody else.

Mr. YEAGER. If we can go off the record, maybe we can get this information for you. You would have the information, you could use it for your own internal purposes and you wouldn't have the issue of public release. It is certainly possible the deposition transcript could be released.

Mr. EGGLESTON. In fact, as to her, it's likely, because she has been notified she is going to be a hearing witness and my understanding is the committee, as a routine matter, releases the depositions of hearing witnesses, so I think, in fact, her deposition is going to be on the Internet by Saturday.

Mr. YEAGER. I don't see why you can't get it off the record.

Ms. SAFAVIAN. I don't have a problem with that. Is this something you would be willing to do off the record?

Mr. EGGLESTON. Sure.

Ms. SAFAVIAN. Okay. If we could go off the record.

[Off the record.]

Ms. SAFAVIAN. Back on the record.

EXAMINATION BY MS. SAFAVIAN:

Question. Can you please tell us what your current address is?

Answer. Is that all right?

Mr. EGGLESTON. Yes, that is different.

The WITNESS. [Redacted].

EXAMINATION BY MS. SAFAVIAN:

Question. And I know there was a time you were residing in Washington, D.C.?

Answer. Yes.

Question. Do you happen to recall where that was?

Answer. [Redacted].

Question. And for what time period were you living in Washington, D.C.?

Answer. From February of 1995, until the end of January, 1997.

Question. You said January of '97?
Answer. Yes.
Question. Have you ever lived outside the United States?
Answer. No.
Question. Can you tell me what college you attended and when you graduated?
Answer. I graduated from Columbia College in Columbia, South Carolina, in 1965.
Question. And what degree did you receive?
Answer. A B.A. in English.
Question. Did you receive any other degrees after that?
Answer. No.
Question. Have you spoken with anyone other than your counsel about this deposition today?
Answer. The fact that I was given the deposition or what I was going to say.
Question. Well——
Answer. I mean, other people know I am giving this deposition today.
Question. You have mentioned to other people you were going to be giving a deposition today?
Answer. Yes.
Question. Would those be family and friends?
Answer. Yes.
Question. Okay. Did you discuss with anyone, other than your counsel, the substance of what this deposition was going to cover today?
Answer. No.
Question. Did you review any documents in preparation for your deposition?
Answer. Yes.
Question. Can you generally tell me what it was that you reviewed?
Mr. EGGLESTON. Well, I don't think you have reviewed anything except with me.
The WITNESS. Right.
Mr. EGGLESTON. And I am not going to let her answer questions about things she reviewed with me, so you can ask her whether she has reviewed things independent of me, and I am happy to have her answer, although I think the answer is, no, but I am not going to let her go into the method by which we prepared for testimony.
Ms. SAFAVIAN. Well I don't want to tread anywhere near attorney-client privilege.

EXAMINATION BY MS. SAFAVIAN:

Question. Did you review any documents outside the presence of your counsel?
Answer. No.
Question. Okay. Have you given another deposition, besides the one that you are here for today?
Answer. No.
Question. Have you been asked by the DNC to help collect documents in response to either the House subpoena or the Senate subpoena or the Department of Justice subpoenas?
Answer. Yes.
Question. When were you asked to do that?
Answer. While I was still at the DNC, and since then, I mean, all my documents stayed there pretty much.
Question. You did not take any documents with you when you left?
Answer. Only personal things.
Question. Do you recall when you were asked to collect these documents?
Answer. During the time before I left there, whenever subpoenas were issued, and I don't remember, but I think from maybe November until January of '96 and '97.
Question. And who asked you to sort of collect these documents?
Answer. Joe Sandler at the DNC council.
Question. And were you just collecting documents that would have been in your possession?
Answer. Yes.
Question. Did you happen to collect any documents that would have been in Don Fowler's possession?
Answer. No, I was not the person who did that.
Question. Can you just tell me how it was you came to work at the DNC?
Answer. I worked in South Carolina for Don Fowler, and so when he came to the DNC to be Chair, he asked me to come with him.
Question. And how long have you known Don Fowler?
Answer. Since the early seventies.
Question. And how did the two of you meet?

Answer. He was Chair of the South Carolina Democratic Party and I was working in the headquarters as a volunteer.

Question. So you weren't really working for him, per se?

Answer. Not when I first met him. I began working for him in 1977.

Question. And what were you doing for him in 1977?

Answer. He has an advertising, public relations, community relations firm and I have done a variety of things in that office, public relations work for the most part.

Question. And if you can just kind of map that out for me, from 1977, how long—I don't expect you to get into a lot of detail here, but have you been with Don Fowler from 1977?

Answer. Yes, until now.

Question. Until now?

Answer. Yes.

Question. Are you currently still with him?

Answer. Yes.

Question. You are?

Answer. Yes.

Question. How many different jobs would you say in that time period did you hold for Mr. Fowler?

Answer. Well, it is a very small firm, 8 or 10 people, and so I have always been in the same job. I have never been told you are now—your title is now this, this. Nobody has titles where we are, so I have done a variety of things, but it was always just me.

Question. So you have worked in this firm with him from 1977 until——

Answer. Until we came to Washington, and then when we went back to South Carolina and back working at that firm.

Question. And the name of that firm?

Answer. It is Fowler Communications.

Question. And that is located in South Carolina?

Answer. Columbia, South Carolina.

Question. Thank you. What was your initial, I guess, reaction, when Mr. Fowler asked you to join him at the DNC?

Answer. Oh, I was glad to do it.

Question. Did he tell you what it was he wanted you to help him with?

Answer. Yes.

Question. What did he tell you?

Answer. He said he wanted me to run the Chairman's office and to do some of his personal political kinds of things, represent him in some areas where he couldn't be present.

Question. And when did the two of you move out here and begin working at the DNC?

Answer. Late January of 1995, and then I actually went back to South Carolina for a couple weeks in early February and then came back here again. I just had to go back and finish up things there.

Question. And then you were, from, say, February?

Answer. From February on.

Question. Until——

Answer. Until the end of January of '97.

Question. You have been out here the entire time working at the DNC?

Answer. Yes.

Question. When did Don Fowler leave the DNC?

Answer. I don't remember the exact date, but it was January 20 something of 1997.

Question. And that was about the time——

Answer. That was when I left.

Question. Okay. And can you tell me, he asked you to pretty much run the Chairman's office?

Answer. Yes.

Question. How would you describe your job responsibilities or duties?

Answer. Well, I hired and fired the staff that was within the Chairman's office, which is ten or so people. I gave them assignments, I made certain that telephones were answered and calls returned, and requests filled and letters answered or written. I represented the Chairman with other staff, outside the Chairman's office, in staff meetings or just to meet with other members and ask them to do things, or find out what they were doing, and on some occasions, I have met with other people outside of the office, a Member of Congress or somebody like that, and just whatever details came up in the Chairman's office, I took care of.

Question. Would those other meetings that you just mentioned that you would have outside the office, would those be meetings that you would attend because Chairman Fowler was unable to attend those?

Answer. Right, just something he was busy and he wanted somebody in the meeting, so I would go.

Question. And were you there pretty much just to take notes for him or was it a more active role?

Answer. Well, it would depend on the meeting, sometimes it would be just take notes. Other times it would be because we were planning some event or something that was going to go on and so I would give the DNC Chairman's point of view.

Question. You said these were meetings a lot with Members of Congress?

Answer. Well, no, not a lot with Members of Congress, but once or twice with Members of Congress. I met several times at the DNC with Members of Congress who came there. Frequently, I met with people just because he couldn't do it that day, he was busy, but didn't want to neglect these people so I would meet with them.

Question. You mentioned that you pretty much took care of the Chairman's office, the hiring and firing of about ten individuals?

Answer. Yes.

Question. Were you the supervisor, then, over those individuals?

Answer. Yes.

Question. And at that time, can you recall who those individuals were?

Answer. Well, it was not a steady group from beginning to end. There were some people there when we arrived who gradually were reassigned to other places or they left for other jobs and other people came in. They were—I guess every Chairman's office is different from every other and we had certain things we wanted done that maybe had not been done before, so we had to bring in the appropriate kinds of people to do those things.

Question. What types of things would those about ten individuals do? What were their job responsibilities?

Answer. Scheduling the Chairman's—whatever his schedule was, handling telephones, correspondence. We had somebody who would do briefings for him. Several people who just really just were sort of utility people, if we needed somebody to put together a meeting or somebody to write a letter, these people could do it, staff assistant I guess was their title.

Question. Okay.

Answer. And I guess that is all the specific roles people had. There was a driver, but the driver also did things like memos.

Question. A driver?

Answer. Yes.

Question. And he would also do memos?

Answer. Yes, he would do clerical kinds of things when he wasn't out driving the car.

Question. Did you have any supervisory role over any other individuals in the office?

Answer. No.

Mr. YEAGER. By office, what do you mean.

The WITNESS. You mean outside the Chairman's office.

Ms. SAFAVIAN. Yes.

The WITNESS. No.

EXAMINATION BY MS. SAFAVIAN:

Question. Okay. Did you ever prepare any letters or memos on behalf of the Chairman?

Answer. Yes.

Question. Was there any distinction as to what letters or memos you would prepare, versus the other staff assistants you just mentioned?

Answer. Not any specific line that was drawn. I would assign people to answer letters or write memos or whatever, and some things I assigned to myself, depending sometimes on the subject matter, sometimes on who the recipient would be.

Question. Do you recall, were there any specific subject matters that were solely your responsibility, versus somebody else's?

Answer. No, there are just some things I knew more about than somebody else might. It is not that I don't want somebody else handling this area. It was I can do this better than somebody else, so I would do it myself.

Question. Would you pretty much review other correspondence that were prepared by other staff assistants?

Answer. Yes.

Question. Did you prepare Chairman Fowler's schedule?

Answer. No, I did not prepare a schedule.

Question. You had a copy of his schedule, obviously?

Answer. Yes.

Question. So you were aware of his daily comings and goings.

Answer. Yes.

Question. Did you ever travel with Chairman Fowler?

Answer. Almost never. During the campaign, during the fall of '96, because his travel was much more—what he did on his trips was much more intense, there were a lot more activities during the day. We did have staff traveling with him, and we sort of rotated people on to the traveling crew, about three people would travel with him, and I did two or three trips with him. It was all really just to give the others a break.

Question. Did you attend many meetings with Chairman Fowler?

Answer. A fair number. Not every meeting, by any means.

Question. What types of meetings would those be?

Answer. Meetings with the DNC staff, I almost always attended. If there was a meeting whose subject I was particularly interested in, I might sit in on it. If there was a meeting that I might get an assignment out of, then I would sit in there. But I didn't sit in on every meeting and sometimes I would ask another staff person to go in there because I don't have time to be in the meeting, go in and take notes.

Question. When you generally attended the meetings, did you take notes at these meetings?

Answer. Frequently. Not intensive notes, not to cover a summary of the meeting, but of what assignment I might have coming out of the meeting or might have need to give to somebody else or something that I might think that Mr. Fowler would want to be reminded of after the meeting. But, no, I didn't make a summary of the meeting or anything.

Question. With the notes you took, would you generally keep those notes?

Answer. No. My normal—I don't like paper and so my normal thing is to write down something that has to be done and when it is done, I throw away the paper or the legal pad and that is the end of it.

Question. So you never retain those notes?

Answer. Not that kind of thing, no.

Question. Was there anybody assigned to attend these meetings and actually take notes of what happened at the meetings?

Answer. Not as a routine thing. I suppose that if there were a kind of meeting where some summary needed to be made, we would put somebody in there, but that was not the usual thing.

Question. Was there any one person you would normally assign to do that if and when you did?

Answer. No.

Question. Would the person who took those notes, would they retain those notes or what would happen to the notes, if you know?

Answer. I am trying to remember a circumstance when we actually did that, and mostly I think it would have been a planning meeting kind of thing, and so if we were planning an event or another meeting or a trip or something, then whoever had responsibility for that would probably have taken the notes and would then have gone away to put the event or the trip together and I don't know what would have happened with the notes.

Question. Okay. Did you ever attend any meetings with Chairman Fowler that were held at the White House?

Answer. Once or twice.

Question. Do you happen to recall what the subject matter of those meetings were?

Answer. I think that one meeting that I attended was a planning meeting for an event that was coming up, that the President was going to attend, and so several people from the DNC staff went to that. And if I attended two with him, it would have been both—both probably would have been planning for events, I can't remember any other kind of subject that we would have covered.

Question. Did you ever attend any of the Wednesday meetings that were held at the White House?

Answer. No.

Question. Do you know which meetings I am talking about?

Answer. I do, but I didn't go to those.

Question. And those were the meetings that were discussing the budget?

Answer. Right.

Question. Okay. Did anyone ever go to those meetings with Chairman Fowler?

Answer. Yes, the chief financial officer went with him.

Question. And who would that have been?

Answer. His name is Brad Marshall. The Chief of Staff usually went. Bobby Watson first and then B.J. Thornberry, and frequently, Joe Sandler, the counsel, would go, and usually one or two people from finance, Richard Sullivan and maybe Marvin Rosen, if he was in town.

Question. Okay. Did you only report to Chairman Fowler?

Answer. Yes.

Question. Did you do anything for Chairman Dodd?

Answer. If he did asked me to, I would, but I can't think of many things I ever did for him. But once or twice, he needed something and I did it, but he had his own staff over there.

Question. So pretty much, you reported to Chairman Fowler?

Answer. Right, right.

Question. Ms. Khare, can you tell me, when was the first time that you met Johnny Chung?

Answer. I don't remember the first time I met Johnny Chung. I do remember the first time I talked with Johnny Chung because it was on the telephone.

Question. Okay.

Answer. And I am sure that soon after that I met him, but I don't remember when.

Question. So you believe the first contact you had with Mr. Chung was over the telephone?

Answer. Yes.

Question. And can you tell me a little bit about that?

Answer. It was in early March of 1995, he telephoned the Chairman's office. I don't think that he asked for me by name, I don't think he would have known my name, but I got on the telephone with him, somebody gave me the call. He identified himself as Johnny Chung, a friend of the First Lady. He said I am in the First Lady's Office, I have met with the First Lady, and I have some important Chinese businesspeople with me. We would like for them to go—I would like for them to go to the President's radio address. I asked Maggie Williams about that and she said she couldn't——

Mr. EGGLESTON. I'm sorry to interrupt, but she is still describing, the "I" in that sentence is Johnny Chung talking.

The WITNESS. Yes, he said that he would like to go to the President's radio address with these people, and that Maggie Williams had told him she could not get him into the radio address, but that possibly somebody in the Chairman's office could, and so he was calling to ask if somebody in the Chairman's office could get him in.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you happen to recall when in March this was?

Answer. No, but it was within a few days of the radio address. I don't know if it was the day before or—I'm not even sure whether that week—sometimes they tape the radio address on Friday and sometimes it is on Saturday morning live, and I don't know whether that was a week that they had it on Friday or Saturday, and I don't know whether it was one day before or 3 days before when he called me.

Question. Just so I understand something that you said, did you say he said he was calling—he, meaning Johnny Chung, was calling from Maggie Williams' office?

Answer. He said I am calling from the First Lady's Office, and I guess you would say, if you were in Maggie Williams' office, you still might say you were in the First Lady's Office.

Question. Okay. And he told you that he wanted help getting into the radio address?

Answer. Uh-huh.

Question. I'm sorry, was that a, yes?

Answer. Yes.

Question. And that Maggie Williams could not help him?

Answer. Yes.

Question. Did he tell you that Maggie Williams suggested that he contact the DNC?

Answer. Yes, he did, he did.

Question. Okay. And this was your first contact with Mr. Chung?

Answer. s, it was.

Question. At that time he called, did you know anything about him?

Answer. I did not know anything about him.

Question. Never heard his name mentioned before?

Answer. I don't think I had heard his name mentioned before. He was not somebody who was familiar to me at all.

Question. Let me show you—let me start with this memo. It is a March 1st, 1995, memo to a Kathleen, whose name is crossed off, and it is written out Katherine?

Answer. That would be Katherine York.

Question. Katherine York?

Answer. Who was the scheduler.

Question. Okay. Why don't you——

Mr. EGGLESTON. Is this Carol 1 or are you going to make this an exhibit?

Ms. SAFAVIAN. I will eventually, yes.

Mr. EGGLESTON. I just like to keep track.

Ms. SAFAVIAN. Sure, no problem.

If you would just go ahead and take a look at this document. Just go ahead and read through it.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Khare, have you ever seen this memo before?

Answer. I don't remember ever seeing this before.

Question. Okay. And I know you just reviewed it, so as you know, this memo is asking, it is from Richard Sullivan and Ari Swiller, and it appears they are asking for a scheduling request for Chairman Fowler from March 8, and it is to meet with Johnny Chung.

Answer. Yes.

Question. Do you recall this meeting taking place?

Answer. I don't. I have since then seen a schedule or something that had the name on it, but I didn't specifically remember that.

Question. It says the preferred time at the top is Wednesday afternoon, March 9?

Answer. Yes.

Question. Then there is an "8th" underneath it, and at the bottom there is a "Thursday, 9:45 to 10 a.m." Do you happen to recall when you were looking at the schedule when this meeting took place?

Answer. No, I don't.

Mr. YEAGER. Do you know if the meeting took place.

The WITNESS. Only because I have seen a schedule recently that had this meeting on it. I don't have any information. I was not in this meeting. I don't remember anything about it.

EXAMINATION BY MS. SAFAVIAN:

Question. You don't recall meeting, perhaps, Johnny Chung, and this delegation of Chinese businessmen at a meeting they would have had with Chairman Fowler?

Answer. No, I don't.

Mr. EGGLESTON. In March of '95.

Ms. SAFAVIAN. Yes, in March of '95.

The WITNESS. No, I don't.

Ms. SAFAVIAN. For the record, I am going to go ahead and mark this as Exhibit CK–1.

[Khare Deposition Exhibit No. CK–1 was marked for identification.]

[Note.—All exhibits referred to can be found at end of deposition.]

Mr. YEAGER. Let me just make an observation for the record. Ms. Khare hasn't really given any testimony of substance with respect to this document, so I just want the record to be clear that its inclusion in the record doesn't suggest that she has given substantive testimony.

EXAMINATION BY MS. SAFAVIAN:

Question. Would requests for Chairman Fowler's schedule ever go through you first?

Answer. Normally, not through me first. Sometimes people would call me or come by and say can I get on the Chairman's schedule. I always then went to the scheduler to find out, because Katherine York, the scheduler, was so good at what she did, that I didn't have to interfere in the schedule very much.

Sometimes I was the appeal, if somebody was turned down, but she handled the schedule. Scheduling was a mystery to me when I went to the DNC, and of course

this was very soon after that. But Katherine did it so well that I didn't have to deal with it very much, unless, if somebody came to me and asked, I would help them facilitate that or if somebody appealed it to me, but as a usual thing, I didn't bother with the schedule.

Ms. SAFAVIAN. Okay. Let me show you a February 27, 1995, letter from Johnny Chung to Richard Sullivan, and if you will just take a quick look at that.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Khare, have you ever seen this letter before?

Answer. No, not that I remember.

Question. Okay. Did Richard Sullivan ever speak to you about this request from Johnny Chung to meet with the President, the Vice President, tour the White House, and have a meeting with Chairman Fowler?

Answer. No.

Question. Did Richard Sullivan ever speak with you at all about Johnny Chung?

Answer. Not in this time period. I am sure that we—I know that we had conversations about Johnny Chung at times while I was at the DNC, but not in this time period, he didn't mention it to me.

Question. When you were looking at this document, it lists—it gives the names, it provides the names of the delegation and provides a resume of the individuals, the Chinese delegation?

Answer. Yes.

Question. Do any of these names look familiar to you or do you recall ever having met any of these individuals?

Answer. No, I don't.

Question. It does not help refresh your recollection?

Answer. No.

Ms. SAFAVIAN. I am going to go ahead and mark that as CK–2.

[Khare Deposition Exhibit No. CK–2 was marked for identification.]

Mr. YEAGER. Again, Ms. Khare said she has never seen the document. I am a bit curious as to why you are including it in the record.

Ms. SAFAVIAN. Because we were discussing it, just so the record is clear.

The WITNESS. I have heard of Irene Wu. I think she was Johnny Chung's secretary. I think she is somebody I later talked to on the phone. At this time I wouldn't have known who she was if somebody asked me, but that is a familiar name, so I think she must have worked in his office.

Ms. SAFAVIAN. Okay. Let me mark this as Exhibit CK–2.

EXAMINATION BY MS. SAFAVIAN:

Question. You mentioned you and Richard Sullivan did have conversations or discussions about Johnny Chung, not with regard to this letter we just discussed, but you mentioned other discussions the two of you had?

Answer. I don't know that I would call it discussions, but if Johnny Chung wanted something from me, I might ask Richard about it. If Richard knew that Johnny Chung was going to be there, he might mention it to me. You know, it was not that we sat around and talked about Johnny Chung.

Question. If Richard Sullivan were to mention that Johnny Chung was going to be around, was that to see if he could maybe meet with Chairman Fowler or something like that?

Answer. No, it would probably be so I could go in the office and close the door.

Question. What do you mean by that?

Answer. Because later, after I knew Johnny Chung, he had a lot of requests and usually wanted something, and I usually was busy and didn't want to deal with it, and so if Richard said he was coming to the DNC, I probably would be unavailable.

Question. Okay. If Chairman Fowler is having meetings with individuals who come in to meet with them, and I don't mean White House people or anybody on the DNC staff, but, for instance, if Johnny Chung and this Chinese delegation of businessmen were to come visit Chairman Fowler, is that something that usually a photographer would be present during the meeting and take pictures of?

Answer. No, unless they brought a camera. We didn't have a photographer who did that.

Question. There wasn't one on staff at the DNC?

Answer. No.

Question. When Johnny Chung came to you asking for help from the DNC to get into the radio address, what did you do after you spoke with him? What was your initial response to his request?

Answer. My initial response was pretty much the same, that I would make to anybody who came up with a request, I don't know, but I will see and I will call you back, and he gave me a number, and I didn't know about the radio broadcast at that time. This was the first I knew that people went to the radio broadcast. But there was a lot that I didn't know then because I really had not been there very long, so I went out into the outer office where the staff assistants were and asked if anybody there knew whether we could get people into the radio address. And one of the staff assistants said, well, I know somebody at the White House who handles that, I will call and see.

I explained here is this man and these Chinese businessmen. He is a friend of the First Lady, and she said I will call over there and see. And in a short time she came back in the office and said I called the person I know and they can go to the radio broadcast, and that was that, so I then called Mr. Chung and told him that they would be able to go.

Question. Okay. Let's just back up a little bit. You mentioned that you didn't know anything about attending radio addresses, so you went out into a general room where the other staff assistants were?

Answer. Yes, there were five or six people having desks in the area, all of whom had more Washington experience than I did.

Question. So you just phrased the question to everybody?

Answer. Does anybody know if we can get somebody into the radio address.

Question. And you said one staff assistant mentioned she knew somebody at the radio address, who was that?

Answer. Ceandra Scott.

Question. And what did she do at the DNC?

Answer. She worked in the Chairman's office. She was there when we got there. She did some telephone call kinds of things, answered the telephone in there. She handled—at that time she handled sort of the traffic going in and out of the Chairman's office, who went in to see him, the daily schedule, what do they call that, the day of schedule is what she called it, and if there were schedule changes during the day, which there always were, she would call and say he is going to be late for his lunch or we need these two people to come up 15 minutes later. She dealt with that all day every day.

Question. So she said—what did she say exactly?

Answer. She said I know somebody at the White House who works in that area or who handles that kind of thing or something, and she said I will call my friend or I will call the person I know. I don't know the name of the person she called.

Question. She didn't mention it to you?

Answer. She probably did at this time, but it was not a name I knew anything about, and so she went ahead and made the call.

Question. Do you recall if it was a man or a woman that she mentioned?

Answer. I don't know.

Question. Do you recall what office in the White House?

Answer. No.

Question. And you don't recall specifically what day that Johnny Chung contacted you about this?

Answer. No, I don't.

Question. If I tell you that Johnny Chung and the Chinese delegation attended the radio address on March 11, 1995, and that that was a Saturday, does that help you at all determine what day of the week Johnny Chung contacted you?

Answer. I assume it was 1 or 2 or 3 days before that when he called, but I don't know which day of the week he would have called, I mean, I didn't make notes about it at the time or write it on my calendar or anything.

Question. So as soon as you hung up the phone with him, you immediately went and asked anybody if they knew anything about this?

Answer. Yes.

Question. And then do you know when Ms. Scott made her phone call?

Answer. Immediately.

Question. It was immediately?

Answer. Yes.

Mr. EGGLESTON. Can I stop you a second. I want to be clear. You say you assumed it was 1 or 2 or 3 days. I take it it could have been 4 or 5 or 6.

The WITNESS. I guess it could have been, but my sense is it was very close to time, but I don't want to be pinned down on a day because I really don't know.

Mr. EGGLESTON. I just want to make sure you weren't pinned down to 1 or 2 or 3 days, even that you are not sure about.

The WITNESS. Although, actually, now I know they schedule all that stuff kind of last minute, so it couldn't have been a month ahead of time.

EXAMINATION BY MS. SAFAVIAN:

Question. And how do you know that they schedule all this at the last minute?

Answer. Because since that time I have had occasions to call over there for somebody else to go to the radio address, more than one time, and subsequent to this experience, I learned a little bit more about how things work.

Question. You have subsequently called at the last minute; is that right?

Answer. Yes.

Question. Is that how you know?

Answer. Well, I have subsequently called and they said we won't know until shortly beforehand which day he is doing it and whether there is room for anybody to come.

Question. And so you were telling me before that Ms. Scott immediately called?

Answer. Yes.

Question. The person she knew at the White House?

Answer. Yes.

Question. Were you present when she had that conversation?

Answer. No, I went back into my office.

Question. And do you recall when she came back and told you what she had learned?

Answer. It was fairly soon after that, that she came and said they can go.

Question. When you say fairly soon, do you mean the same day.

Answer. Yes.

Question. Do you mean, you know, within a half-an-hour time span?

Answer. Well, I wouldn't want to be pinned down to that, but he was waiting for our return phone call, and so I know it was not too long.

Question. Okay. Now, you mentioned that you took down a phone number where you could contact Johnny Chung?

Answer. Yes.

Question. Do you recall him telling you where he could be reached?

Answer. When I called him back, it was at the First Lady's Office.

Question. It was at the First Lady's Office?

Answer. Yes.

Question. And how do you know that?

Answer. Because they answered the phone, Office of the First Lady.

Question. Okay. That would do it. After Ms. Scott told you that they were able to get into the radio address, did she tell you anything further or was it just a simple "they are able to go"?

Answer. I don't recall what else was a part of that, but I know, because I have dealt with radio addresses after that, that at some point, the names and passport numbers or Social Security numbers or whatever had to be collected and given to the White House because you can't get in if they don't have that, but whether she said to me—I am sure she told me how that would be handled, but I just don't remember what it was, whether I was to get that information and get it to the White House or whether they were—Johnny Chung was supposed to call it in to somebody, I just don't remember.

Question. She told you that?

Answer. That it was taken care of.

Question. And then when did you contact Johnny Chung?

Answer. I called him back right then and told him, and I am sure I gave him some instructions about how to go, what gate to go through or who to talk to about passport numbers. Whatever it was, I am sure I must have told him, but I do not remember that.

Question. Why do you say you are sure?

Answer. Because he had to be instructed. Everybody that you take to the White House or send to the White House has to be told certain information so they can get in.

Question. Do you recall asking or receiving from Johnny Chung a list of the Chinese delegation and their names?

Answer. No, I don't remember that.

Question. So do you remember forwarding anything to the White House?

Answer. I do not remember that, whether I did that or not.

Question. Do you recall asking Ms. Scott to follow up and get that information?

Answer. No.

Question. Did you ask Ms. Scott to do anything else after she had made that phone call?

Answer. Unless I got her to take care of that information, which I do not remember. I do not remember anymore conversation with her about it.

Question. So you contacted Johnny Chung in the First Lady's office and told him——

Answer. That he could go to the radio address.

Question. Did he ask anything else of you?

Answer. No.

Question. You don't recall if you told him anything else?

Answer. No. No.

Question. Did you tell Chairman Fowler about this conversation that you had with Johnny Chung about the radio address?

Answer. I doubt it. I do not remember that I told him that.

Question. Did you subsequently ask anybody at the DNC, who is this Johnny Chung?

Answer. I must have. Later. There was some things came up the next week about the photos that were taken at the radio address, or I might have forgotten about the whole thing. They did take photos of Johnny and his guests and the President. And some—there was a person on DNC staff who dealt with photos, with people who had gotten their picture taken with the President. That was not his whole job but he was the person that you would talk to if you wanted to get a photo. He came to me and said, the National Security Council is really mad at you, which was frightening, because these Chinese nationals got their picture taken with the President. Now they want the pictures and the National Security Council does not think that is a good idea. And so then that sort of made me know more about Johnny Chung, be more aware of Johnny Chung. And after that there was some back and forth about whether he could have the pictures, would he get the pictures, that kind of thing, but I do not remember whether in the end he got them or not.

Question. Let me ask you some questions about what you just stated. You said that there was an individual at the DNC who handled photographs.

Answer. Yes. That was not his entire job but that was one of the things that he did.

Question. Who was that individual?

Answer. His name is Eric Sildon.

Question. Mr. Sildon, then, he is the one that approached you about Johnny Chung?

Answer. Yes.

Question. Do you recall when this was?

Answer. No. A few days or a week or two after the radio address. I do not remember just when.

Question. Do you know how Mr. Sildon became aware of this whole situation?

Answer. I think that Johnny Chung had called the DNC saying, I want the photos. Then when someone at the DNC tried to get the photos, they were told we do not want him to have them.

Question. Did Johnny Chung ever contact you and ask you for assistance in getting these photos?

Answer. I don't think he did. I don't remember that he did.

Question. Do you know if he contacted Eric Sildon and that that is how he got involved?

Answer. I don't know whether he contacted Eric Sildon or whether he contacted somebody in DNC Finance, which would have been the routine thing for him to do as a donor. He would have had a contact person in DNC Finance. He may have contacted that person who then went to Eric Sildon and said, get me these photos.

Question. Did Richard Sullivan ever mention to you that Johnny Chung had contacted him about these photos?

Answer. I do not think so.

Question. You just do not——

Answer. I don't remember that he did.

Question. You just do not recall any individual's name with the DNC that Johnny Chung may have contacted?

Answer. No, I do not.

Question. Do you know how Mr. Sildon knew that the NSC was holding on to these photographs?

Answer. I think he called over there, as he routinely would, to get the photographs and was told, no, you can't have them.

Question. Do you know who he would have contacted?

Answer. No.

Question. Did the DNC have a contact person at the White House?

Answer. There is a White House Photo Office and I guess it was somebody in there. That is who, if I ever needed a photo that I knew had been taken at the White House or with White House, by White House photographers, I would say, can

you get me this photo, and Eric or whoever I asked would say, I will call the White House Photo Office.

Question. So you never yourself called the White House Photo Office?

Answer. No.

Question. So Mr. Sildon mentioned to you that the NSC was upset with you?

Answer. Yes. And I think part of that he was trying to scare me that NSC is after you, I mean it was, that was sort of the way he put it. But then he explained to me that this had happened and that they did not want him to have the photos.

Question. Did he know or explain to you why the NSC——

Answer. He said these are Chinese nationals and they didn't think it was a good idea for the President to have had his picture taken with them.

Question. Did you or anybody else at the DNC ever inquire of Mr. Johnny Chung who these individuals were that he wanted to get into the radio address?

Answer. He told me on the telephone when he made the request, these are important Chinese businessmen. I did not give Ceandra anymore information than that when she called over to the White House. If she was asked for more information than that, she didn't come back to me for it.

Question. And you never inquired to Mr. Chung for any further information?

Answer. No.

Question. Did the NSC ever contact you?

Answer. No.

Question. Did anyone in the White House ever contact you about this request?

Answer. I do not think so. I do not remember.

Question. Did anyone in the White House contact you about these individuals?

Answer. No.

Question. Let me show you a memorandum, dated March 28, 1995, that is from Betty Currie. If you will just take a look at that. Have you ever seen this document before?

Answer. No.

Question. Do you happen to know who this, the John who is referenced at the top would be?

Answer. No.

Question. Did you know a Jonathan Frieberg at the White House?

Answer. No.

Question. Never spoken to a Jonathan Frieberg?

Answer. No.

Question. Taking a look at really the only substance to this memorandum, it says, "Ceandra Scott called. She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the radio address. Apparently they were in Maggie's office when request came and Maggie said she didn't know, but to contact DNC."

Do you know what this is referring to?

Answer. I have no idea what that means.

Question. Did you ask Ms. Scott to call Betty Currie?

Answer. I don't know who Betty Currie is.

Question. Okay. She worked in the White House, works in the White House right now.

Answer. I don't know.

Question. I am just wondering if you had asked Ms. Scott to contact anyone at the White House at the end of March about Johnny Chung?

Answer. No. Not to my memory I didn't.

Question. Do you know if there is, if there is any reason why Ms. Scott would have called the White House on her own?

Answer. No, I don't.

Question. As far as you know, after Ms. Scott made the phone call for you at the White House, she was not involved in this any further?

Answer. As far as I know, as far as I can remember, she was not.

Question. It appears what this is saying is that Ceandra Scott had stated that the White House should have called them prior to Mr. Chung and the delegation coming to the radio address. Do you know what that might be about?

Answer. No.

Ms. SAFAVIAN. Let me mark this for the record as Exhibit CK–3.

[Khare Deposition Exhibit No. CK–3 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. You mentioned that Eric Sildon spoke with you and it could have been a couple days or a week after the radio address about the NSC holding on to these photos.

Mr. EGGLESTON. I think she said it may have been as far as 2 weeks.

The WITNESS. I do not remember.

EXAMINATION BY MS. SAFAVIAN:

Question. You didn't know how long after the radio address, sometime after the radio address?

Answer. Right.

Question. But do you believe it was in March?

Answer. I believe it was, but I do not—I wouldn't swear to that.

Question. Okay. Let me show you an April 5, 1995, letter to Don Fowler from Johnny Chung. If you would go ahead and take a look at that.

Have you seen this document before?

Answer. I do not recall this document.

Question. If you will notice——

Answer. I see it has a cc to me.

Question. Do you have any reason to believe that you would not have gotten a copy of this document?

Answer. No.

Question. This is dated April 5, 1995. Do you believe that Eric Sildon, that you knew about the problem with the photos from Eric Sildon prior to——

Answer. Prior to this? Probably, but because I do not remember—it sounds to me like this came after he had already tried to get the photos. Probably Eric had already come to me and told me that little tale. I don't know that for sure.

Question. Okay. Did Don Fowler discuss anything in this letter with you after he received it?

Answer. I do not remember that he did.

Mr. YEAGER. Did Don Fowler know about this? Strike that. Did you tell Don Fowler about——

The WITNESS. The whole episode? I do not remember telling him that. I can't think that I would have. I just do not remember that conversation with him until just recently.

EXAMINATION BY MS. SAFAVIAN:

Question. Since this is addressed to Don Fowler, would he have read this letter?

Answer. He would have had it in his office.

Question. If you will notice, the last sentence of the first paragraph, it reads: "I have learned from Mr. Richard Sullivan of DNC that the National Security Council is holding on to those pictures."

Answer. Yes.

Question. Did Richard Sullivan ever tell you or mention to you that the NSC was holding on to those photos?

Answer. I don't remember talking with Richard about it. I remember talking with Eric about it. I don't remember talking with Richard about it.

Question. And do you remember speaking with Don Fowler about it?

Answer. No.

Question. Do you know if Don Fowler made any phone calls or any attempts to assist Mr. Chung in getting these photographs?

Answer. I don't know that he did.

Question. Did he ever ask you to make any phone calls or assist in any way?

Answer. No.

Question. And forgive me if I asked this already, do you recall Mr. Chung contacting you and asking for your assistance in getting these photographs?

Answer. No, I do not recall his doing that.

Question. Do you know why he would have cc'd this letter to you?

Answer. Well, because I was probably—I was the one who had set up the, their attendance at the radio broadcast in the first place. I was a name that he knew there in the chairman's office.

Mr. EGGLESTON. Obviously, she doesn't know why he did it. She can only surmise.

Ms. SAFAVIAN. Let me mark this as Exhibit CK–4.

[Khare Deposition Exhibit No. CK–4 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Let me now show you an e-mail from Robert Suettinger of the NSC, dated April 7, 1995. If you will just take a quick look at that.

Mr. EGGLESTON. Do these read from the bottom up?

Ms. SAFAVIAN. What this is is, the top half of it is what appears to be a response to the bottom, which was the original e-mail.

Mr. EGGLESTON. If we are going to read them the way they were transmitted, we would read the bottom one first and then——

Ms. SAFAVIAN. When you respond to an e-mail, it cuts off usually part of the message and keeps half of it. So the bottom is not a complete version of that e-mail.

Mr. YEAGER. Actually, the times and dates at the top of each message suggests that——

Mr. EGGLESTON. The reverse is true. I am sorry.

Mr. YEAGER. That the top preceded the bottom.

Ms. SAFAVIAN. Let me clarify that by handing you another e-mail. This is the original, the original request that came out from Darby. It is addressed to Roseanne Hill, Stanley Roth, and Robert Suettinger. The time is 10:12 a.m. on April 7, 1995.

Mr. EGGLESTON. So we think the order is what is going to be marked Khare 6 is first; top of Khare 5, second; and bottom of Khare 5, third?

Ms. SAFAVIAN. Let us not get too confused here. Why don't I go ahead and mark them as exhibits so that we can refer to them as exhibit numbers. Why don't I mark as Exhibit CK–5 the first e-mail which is this one from Darby to Roseanne Hill, Stanley Roth and Robert Suettinger, EOP 004538, and Exhibit CK–6 will be the e-mail from Suettinger, which is EOP 005439.

[Khare Deposition Exhibit No. CK–5 was marked for identification.]

[Khare Deposition Exhibit No. CK–6 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Have you had a chance to look at both of those?

Answer. Yes.

Mr. EGGLESTON. Could we just hold up one second because I was so busy getting organized?

Ms. SAFAVIAN. Sure.

Mr. YEAGER. The other thing I would like to point out for the record, looking at CK–5, the message from Brooke Darby, is to Asian Affairs, Asia-Asian Affairs, and what I think you have characterized as a response is from Robert Suettinger. It is not at all clear from this that Suettinger is responding to this e-mail here.

Ms. SAFAVIAN. Well, I think if you look at Exhibit CK–5, at the top it says, to Hill, Roseanne M.; Roth, Stanley O.; Suettinger, Robert L.

If you look at Exhibit CK–6, it shows that the sender is Robert Suettinger. It is to Melanie B. Darby. The subject on both of these is photos. Unclassified in parenthetical. And the bottom message from Brooke Darby is attached or is at the bottom of Suettinger's response.

Mr. EGGLESTON. Let me say, we are not going to, just ask us the questions. We cannot adopt a supposition that they are responses or not responses.

Ms. SAFAVIAN. I am not asking you to.

Mr. EGGLESTON. You can go ahead and ask your questions without us buying into who said what, when, and whether it was a response or whatever.

EXAMINATION BY MS. SAFAVIAN:

Question. You have had a chance to look at these?

Answer. Yes.

Question. Have you ever seen these documents before?

Answer. No.

Question. Looking at Exhibit CK–6.

Answer. Yes.

Question. Were you ever told by Eric Sildon or another individual as to the concerns of the NSC in releasing these photos?

Answer. Just that Eric Sildon said to me, they are concerned because these were Chinese nationals and they should have the—I mean, he did not say these are bad guys or anything, just said these are Chinese nationals and they should not have the President of—the photo with the President released. That was the concern.

Question. Did Mr. Sildon ever mention to you how it was that the NSC got involved in this?

Answer. No, he didn't.

Question. Did you ever speak to anybody at the White House about the NSC holding on to these photographs?

Answer. I don't remember doing that.

Question. Did you become aware at that time that the NSC considered Johnny Chung to be a hustler, as you can see in the second paragraph?

Answer. No. Nobody said that to me.

Mr. EGGLESTON. I might say that we don't know that any of these involved the NSC. If you have that from some independent source, but do I know that these are NSC—you don't know that these are NSC e-mails; do you?

The WITNESS. No.

Mr. EGGLESTON. I am sure you have it from some external source. I just want it clear from Ms. Khare's point of view, she doesn't know that these are NSC people. You can ask her any question you want, but I do not think she recognizes these names.

The WITNESS. No, I don't recognize these names, period.

Mr. EGGLESTON. I don't think it has NSC on here.

Ms. SAFAVIAN. No, it does not.

Mr. EGGLESTON. I just want you to know she has no knowledge even from reading the e-mail that the NSC said that he was a hustler. She doesn't know that.

EXAMINATION BY MS. SAFAVIAN:

Question. That was what I wanted to find out, if anyone had, in fact, told you what the NSC had determined about Johnny Chung and this Chinese delegation of businessmen?

Answer. No.

Question. You never learned——

Answer. I don't remember being told that at all.

Question. And you, I think you had just mentioned you don't know these individuals who are listed?

Answer. No.

Question. On these e-mails?

Answer. No.

Question. And had never spoken with them?

Answer. No.

Question. After this, did the White House or anybody ever contact the DNC and tell the DNC, we are a little concerned about, the NSC is concerned about Johnny Chung and we just wanted to let you know that? Did you ever receive any phone call like that?

Answer. No.

Ms. SAFAVIAN. I believe that these exhibits are already marked.

Mr. EGGLESTON. We have been going about an hour and 10 minutes. If we would break in 5 or so minutes.

Ms. SAFAVIAN. Whenever you would like to.

Mr. EGGLESTON. Whenever is convenient. Just a convenient stopping point.

Ms. SAFAVIAN. Let me go through one other document with you real quick.

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Khare, let me show you a fax cover sheet that is from you to Johnny Chung. If you look at the top, the facsimile looks like the date is April 11, 1995.

Answer. Yes.

Question. Let me just ask you, first of all, do you recall preparing this document?

Answer. No, but it is my writing so obviously I did.

Question. In the comments section it says: "The White House assures me that you now have the pictures. Hooray. If you don't, give me a call. Have a good trip."

Do you recall learning that the White House had, in fact, given Johnny Chung the photographs?

Answer. No, I really don't. Obviously, I did learn it, but I do not remember that.

Question. You don't recall who you would have contacted at the White House to find that out?

Answer. No, and I may not have contacted anybody at the White House. I mean somebody actually on my staff could have told me, on the DNC staff could have told me.

Question. Do you recall any particular reason why you would have sent this to Johnny Chung?

Answer. No. Other than—no, I mean, since I didn't remember sending it, I don't remember any reason.

Question. You don't recall him calling you and——

Answer. I don't remember him calling me about it. This just was not the highest priority in my life at that time. So things could have happened that—a lot of things happened that I am sure I do not remember.

Ms. SAFAVIAN. Let me mark this as CK–7.

[Khare Deposition Exhibit No. CK–7 was marked for identification.]

Ms. SAFAVIAN. Why don't we go ahead at this time and take that break.

[Brief Recess.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Khare, just one last question on CK–7. You mentioned "have a good trip." Do you recall where Mr. Chung was going?

Answer. No. Although there was a letter here where he said he was going to China and wanted the pictures to go with him. So obviously I knew that he was going on that trip.

Question. Would that have been the letter he addressed to Mr. Fowler?

Answer. I just remembered when you showed me things, seeing that in here.

Mr. EGGLESTON. CK–4, I think.

EXAMINATION BY MS. SAFAVIAN.

Question. Yes, CK–4, it states, "I am going to China next week."

Answer. Yes.

Question. "I do need to bring those pictures with me."

Answer. Yes. So I don't know if he had told me that or I had seen it in a letter, whatever.

Question. Okay. You had mentioned the first time that you had any contact with Mr. Chung was when he called you about this radio address.

Answer. Yes.

Question. Do you recall from that time period to CK–7, the date being April 11, 1995, ever actually meeting Mr. Chung in person?

Answer. I don't remember when I ever met him the first time in person.

Question. You don't recall the first time you actually met him?

Answer. No.

Question. Do you recall what the circumstances were?

Answer. No, I don't.

Question. Do you recall if somebody introduced you to him?

Answer. I don't remember.

Question. If I could just show you a May 8, 1995, letter to Don Fowler from Johnny Chung. If you will just go ahead and take a moment to look at that.

Mr. WERBEL. Is the number cut off at the bottom?

Ms. SAFAVIAN. I am afraid it is. I apologize for that.

Mr. EGGLESTON. You don't have a better version?

Ms. SAFAVIAN. Not with me.

EXAMINATION BY MS. SAFAVIAN:

Question. Have you finished reading that?

Answer. Yes.

Question. Can you tell me, have you ever seen this letter before?

Answer. I do not remember this letter but probably I did.

Question. Once again, it is cc'd to you at the bottom?

Answer. Yes.

Question. Do you have any reason to believe that you would not have gotten a copy of this?

Answer. No.

Question. In the first paragraph it says: "It was wonderful to see you again. I appreciate you and Carol making the time available for us to talk about the latest update from my recent trip to China."

Answer. Yes.

Question. Does this help you place in time when you may have met with, met Mr. Chung?

Answer. I don't even remember this meeting, although I remember that we had a conversation with him that probably was this meeting about going to China. He wanted some DNC people to go to China. And whether prior to that meeting I had met him, I don't know. I don't know. I mean, obviously, I was in a meeting with him on that subject, but whether that was the first meeting I had with him or not, I don't know.

Question. At least we can establish that——

Answer. By that point I had met him.

Question. Okay. And as you can see in the second paragraph, it appears that Mr. Chung presented Don Fowler with an official invitation from the Chinese government?

Answer. I vaguely remember that. I do not remember what it looked like or anything like that. I remember that he was very anxious for us to go to China.

Question. And when you say "us," who——

Answer. Well, he wanted Chairman Fowler and some DNC staff members, and he always, when he would talk about it, would say to me, now, Carol, you will have to come. You will have to come.

Question. Did Don Fowler or any DNC staff members ever take a trip to China with Johnny Chung?

Answer. No.

Ms. SAFAVIAN. Let me mark that as CK–8.

[Khare Deposition Exhibit No. CK–8 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN.

Question. Ms. Khare, do you know who Harry Wu is?

Answer. Yes.

Question. And what do you know about him?

Answer. I know what he was a prisoner in China, a political prisoner in China although he was from the United States. There was in the summer of 1995, I guess, there was an effort being made diplomatically to get him out.

Question. Were you involved at all in this effort to free him?

Answer. No.

Question. How do you know anything about this?

Answer. Well, it was in the news, but Johnny Chung wanted to be involved in the effort to free him or thought that he could be of help and was going to China and was very anxious to be helpful to the President and to the United States in getting him out. And he talked about it.

Question. Did he talk to you about that?

Answer. Yes.

Question. How often?

Answer. Well, more than one time. I mean, I saw him. He came to the DNC maybe a couple times in that time period and he called me a couple of times about it, that he really needed to help with this and he, I am not sure why, except that I would take his phone calls, why he called me about it.

Question. Would he call you directly or was he trying to get Chairman Fowler?

Answer. He was calling me directly. Maybe he wanted to go and talk to the President about it and that kind of thing, but he was just very interested in the whole subject, and I was somebody in semi official Washington that he could talk to about it, so he did.

Question. Did he ever ask you for any assistance or for help in any way with this matter?

Answer. No. I do not think he did. Unless me asked me if I could get him in to see the President or something, which I don't know that he did.

Question. He was just calling you?

Answer. He just was—yes. And would I let the White House know that he was working on this, that kind of thing.

Question. What would you say to him after a conversation like that took place?

Answer. I would say, sure, if I talk to anybody, I will let them know that you are working on this. We all know you are trying to help. Thanks a lot. That kind of thing.

Question. Would you——

Answer. I was not unkind to him, but I really did not think that he was going to be able to get Harry Wu out of China.

Question. Did you ever pass on his comments that he was trying to help Harry Wu to anyone at the White House?

Answer. I don't think so.

Question. Did you ever speak to Chairman Fowler about this?

Answer. I probably did. But not in a sense that you really need to go to call the President and tell him this. More, Johnny Chung says he is going to get Harry Wu out, that kind of thing.

Mr. YEAGER. I take it you were being facetious?

The WITNESS. I guess that I was. I truly did not take his effort very seriously.

EXAMINATION BY MS. SAFAVIAN.

Question. Let me show you a July 24, 1995, letter from Don Fowler to Johnny Chung. If you will just take a look at that. Have you seen this letter before?

Answer. I do not recall this letter.

Question. Would this have been something that you would have prepared for Don Fowler or would this have been something that a staff assistant would have done, if you can say?

Answer. I don't know. I think probably a staff assistant did it. But I could possibly have done it. This was the kind of thing that whoever happened to be standing there might do. It may even have been dictated. I mean, it could be that Chairman Fowler did it himself. I just do not recognize this particular one.

Question. If you look in the second paragraph, starting with the second sentence, "I enjoyed meeting your friend who is the wife of the Chief of Staff of the Chinese Army."

Do you recall this meeting that Don Fowler had with the wife of the Chief of Staff of the Chinese Army?

Answer. I do not remember that specific meeting, although he brought a number of people up there to meet the chairman so I am sure that was one in a bunch.

Question. You don't specifically recall this meeting, though?

Answer. No.

Question. Would Johnny Chung call ahead of time and try and get appointments with the chairman or would he just maybe show up?

Answer. Sometimes he called ahead of time. More likely he would just show up.

Question. And he would show up with guests with him?

Answer. Yes.

Question. Would Chairman Fowler always find time to meet with him?

Answer. He wasn't even always there. In fact, sometimes I met with some people just because somebody had to go down and meet with these people and be polite to them because they were guests. But, no, he obviously couldn't always meet—and sometimes when people dropped by like that, which was not unusual for people just to drop by to see him, he would just walk out into the hall or down in the reception area and say, I am sorry, I am busy, but I am so glad you came by, good-bye. This could even have been like that.

Question. Okay. If we continue in that second paragraph, quote: "We all look to you for guidance and help over the coming months. Please let me know about your efforts to gain the release of Harry Wu."

Answer. I think that is good manners.

Question. So Don Fowler obviously knew about Mr. Chung's efforts or desire to free Harry Wu?

Answer. Yes.

Ms. SAFAVIAN. Let me mark this as Exhibit CK–9.

[Khare Deposition Exhibit No. CK–9 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN.

Question. I am going to be handing you two documents. They are both a July 25, 1995, letter to Johnny Chung from Don Fowler. You can take a look at both of them.

Answer. Looks like the same words on both of them.

Question. I was going to ask you, do you agree that it appears to be the same letter with the exception of at the bottom of DNC 3233816 there are some Chinese characters.

Answer. Yes.

Question. That does not appear on DNC 3102488.

Answer. Yes.

Mr. YEAGER. Do you know if they are Chinese characters?

The WITNESS. No, as a matter of fact, I don't know if those are Chinese characters.

Mr. EGGLESTON. I was going to ask you to read the Chinese to us.

The WITNESS. You were not going to tell them that is a talent of mine.

Mr. EGGLESTON. She is kidding.

The WITNESS. I was kidding, and I don't know that this is Chinese, although with Johnny Chung it probably would not be Japanese.

Ms. SAFAVIAN. Just so we do not get confused, why don't I go ahead and mark these two as exhibits. I will mark DNC 3102488 as Exhibit CK–10, and I will mark Exhibit DNC 3233816 as Exhibit CK–11.

[Khare Deposition Exhibit No. CK–10 was marked for identification.]

[Khare Deposition Exhibit No. CK–11 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. First of all, looking at Exhibit 10, do you recall this letter, preparing this letter or sending this letter out?

Answer. No, I do not.

Question. Let me just read it for the record. Starting with the second sentence of the first full paragraph: "You are to be commended for your efforts to build a bridge between the people of China and the United States. I want to express my appreciation to you for being a friend and a great supporter of the DNC.

"Good luck on your trip to China and please keep me informed. Thank you."

Did Johnny Chung ask Mr. Fowler to prepare a letter like this?

Answer. I do not think so. We sent letters to almost anybody who came to the office. I mean, that is something that Don Fowler routinely does, if he sees somebody, meets them on the street, he sends them a letter. So this was a very routine kind of thing to send out.

Question. I am sorry, even using language that I just read, "efforts to build a bridge between the people of China and the United States," did that have anything to do with his trip to China to help free Harry Wu?

Answer. I don't know, but he talked, in conversations with him he would talk about wanting to build bridges between our two countries. That kind of thing. So that is his language. That would be the kind of thing you would put in a polite note to somebody who had come by. Some of the conversation in that would have been in his conversation.

Question. So you do not recall Johnny Chung asking for a letter like this to be drafted?

Answer. No.

Question. Okay. If you look at Exhibit 11——

Mr. EGGLESTON. CK–8 has got Chung writing about the important bridge making process.

The WITNESS. Yes. That is just——

EXAMINATION BY MS. SAFAVIAN:

Question. Were you finished with what you were saying?

Answer. Yes.

Question. If you look at Exhibit 11, first of all, would the DNC have sent a letter to Johnny Chung including these, what I believe to be Chinese characters, on the bottom of the letter?

Answer. No. I do not think we had anybody who could, was capable of doing that at the DNC.

Question. If you look at the top of the document, it looks like it was faxed on 7/25/95. It says, DNC Chairmen Dodd and Fowler with an arrow pointing to AISI, which was Johnny Chung's company.

Answer. Right.

Question. Do you know how it is, then, that the DNC had possession of this letter in this format with the Chinese characters at the bottom?

Answer. No, I do not. I have no idea. Obviously, I guess this came from the DNC. But I don't know how that would have gotten on there.

Question. And how the DNC would have gotten the letter back?

Answer. No. I don't know. I mean, this looks like something that went out of our office. This does not. I assume this got put on it somewhere else and it came back.

Question. But you don't know why it came back?

Answer. No, I have no idea.

Question. Were you aware through conversations you had with Johnny Chung that he was asking or wanting from the White House a credential letter for his trip to China?

Answer. I do not remember that. I am not sure what a credential letter is. But I do not remember that particular thing.

Question. Let me show you a set of documents that starts with a fax cover page from AISI to Betty Currie from Irene for Johnny Chung dated July 25, 1995. If you will just take a quick look at these five pages. Have you finished looking at that?

Answer. Yes.

Question. Have you seen any of these documents before?

Answer. Other than the, than this one, I do not think that I have.

Question. You are referencing the last document, which is EOP 005057?

Answer. Yes.

Question. Which is the letter to Johnny Chung from Don Fowler that we were just discussing?

Answer. Yes.

Question. Actually, if you will take a look, looking at that last page of the document, looking back at Exhibit CK–11, if you will notice, and maybe you can help me out with this, they are the same letters with the exception, once again, that CK–11, there is the Chinese characters at the bottom. On the EOP 005057 version that does not exist. But at the top of both of those documents we have the same facsimile message at the top. The typesetting seems to be different between the two documents. I am just wondering, first of all——

Answer. It does. I agree with you.

Question. Do you have any knowledge as to why that may be or any explanation for that?

Answer. No.

Mr. YEAGER. It could be reduced.

The WITNESS. I think this one is just reduced because the letterhead is reduced, too.

EXAMINATION BY MS. SAFAVIAN:

Question. Okay. First of all, as you can see from this document, and I will mark it as CK–12 so we can refer to that as CK–12, this is the set of documents which is EOP 005053 through 5057.

[Khare Deposition Exhibit No. CK–12 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Do you have any reason to know why Johnny Chung would have sent a copy of Don Fowler's letter to him to the White House?

Answer. No.

Question. And he did not mention to you at all his desire to get the White House to send him a credential letter?

Answer. If he did, I don't remember.

Question. Did you ever make any phone calls on his behalf to the White House to get such a letter for him?

Answer. I don't think so.

Question. Did you ever at any time request from the White House for them to write any letter for Johnny Chung not limited to a credential letter?

Answer. I do not remember doing that.

Question. Making any request like that on behalf of him?

Answer. No.

Question. Did there come a time when Johnny Chung contacted you while he was over in China about Harry Wu?

Answer. Yes.

Question. Can you tell me about that?

Answer. He called me from, he said from Beijing. He said, I guess you know that Harry Wu is out. I helped get Harry Wu out. And I said, that is wonderful, that is wonderful that you got him out.

And he—the First Lady was going to Beijing for something, and he wanted to see her when she came there. And he wanted me to help him. He had tried calling the White House, I think, but he wanted me to help him get into whatever event she was going. He wanted to welcome her to China. He wanted to be there when she arrived. He wanted me to help do that.

Question. He wanted you to help him with that?

Answer. Yes, he wanted me to contact somebody at the White House and get permission for him or clearance, whatever, for him to be able to greet the First Lady when she got to China and be in that group.

Question. Did you assist him in any way in that request?

Answer. No.

Question. You didn't make any phone calls?

Answer. I probably led him to believe that I would but everybody at the White House at that time was in Montana or something, and I had tried to get some people at the White House earlier in the week and had not been able to get them. They would not return my calls. So I sort of rationalized that I made that call for him but I couldn't really reach anybody.

EXAMINATION BY MS. SAFAVIAN:

Question. Okay. Do you recall when it was that he made this phone call to you from Beijing?

Answer. No. I don't remember when it was. It was shortly after Harry Wu's release.

Question. And do you know why he called you?

Answer. Because he thought that I could help him get in to see the First Lady.

Question. Oh, that was the purpose of his phone call?

Answer. That was the point of it, yes.

Question. Okay. And he pretty much just told you that he had—that Harry Wu had been released——

Answer. Uh-huh.

Question. I am sorry. Did you say that he——

Answer. He said, "I helped get Harry Wu out." And I said, "Well, that was wonderful." I didn't argue with him about it.

Question. Was that pretty much the substance of the conversation?

Answer. That was sort of the gist of it. He is a little difficult to talk to because he has right much of an accent and to me it is harder to talk to somebody on the telephone when they have a hard to understand accent. And when they are calling from Beijing, it is even harder and it was not a good connection. I think he maybe even called me a second time to see if I had been able to arrange anything for him to see the First Lady, and I hadn't been able to.

Question. Did you relay to anybody else that Johnny Chung had called you from Beijing and he told you that he had helped free Harry Wu?

Answer. I am sure I did. I am sure I told people that.

Question. Do you recall who you would have told?

Answer. No.

Question. Did he ask you to relay to anybody that he had done this?

Answer. No. No. Unless it was a part of his getting into the First Lady; maybe said, tell her I got Harry Wu out and now I need to meet with her, or something like that, but I didn't—no official notices to the State Department or anything.

Question. Did Mr. Chung, when he was telling you about his efforts and his assistance in freeing Harry Wu, did he happen to mention to you at all what he did?

Answer. No. No.

Question. He didn't go into any detail with you?

Answer. No. I don't think so. I mean, he had said, prior to going over there, that he thought he could help because he knew a lot of people over there, knew the right people to talk to. He didn't tell me how he actually achieved it.

Question. Did he happen to mention to you the names of any Chinese officials that he may have met with about that?

Answer. If he did, I don't remember.

Question. Okay. Let me just show you another letter. This one is dated January 30th, 1996. Actually, it is a group of letters and it is—the Bates Stamp is DNC 3263845 through 3263848. If you will just take a quick look at these for me.

Have you finished looking at them?

Answer. Yes.

Question. Actually, I would like to begin with what is the second document, because as far as timing goes the second document is a January 22nd, 1996, letter. This is addressed to Don Fowler from Irene Wu, who you said you had spoken to?

Answer. Yes. I think she was a secretary or something to Johnny Chung.

Question. Okay. By reading the letter, it looks like she is asking for Don Fowler's assistance in arranging a meeting between Vice President Gore and Professor Qu Geping?

Answer. I don't know.

Question. Okay. Do you recall making any efforts to try and arrange this meeting?

Answer. No.

Question. Okay. If you notice at the bottom of that document, there is some handwriting.

Answer. Mine.

Question. That's your handwriting?

Answer. Uh-huh.

Question. I believe it says, "Don, I am inclined to ignore this. Johnny promised $100,000 in November and another $100,000 in December. None came. C."

Did I read that correctly?

Answer. Uh-huh.

Question. What did you mean by this?

Answer. I think by this point, Johnny was really pestering us a lot. He wanted something all the time. And he always talked about what a big donor he was, but he did sort of quit giving money, and DNC Finance people kept—were complaining about it. I mean, I had been in meetings with them, that kind of thing. They would say, Johnny Chung, he keeps promising us money and he always wants something; he always wants a letter, that kind of thing, and he hasn't given any money. And so I think that's probably the reason for this.

I mean, I don't remember specifically that he promised $100,000 this time and $100,000 another time, but I do remember that DNC Finance was complaining because he was always talking and always wanting something but he wasn't really giving any money.

Question. So you believe that this note that you have down here, you got that information from these finance meetings?

Answer. Yes. I think I probably just was aware of that. I don't think I went down there and said, should we do something for Johnny? I think I just was aware that he had probably had a lot of attention and we didn't have to put forth a lot of effort for him because he had gotten a lot of attention.

Question. Oh, okay. You had mentioned, you know, that he was always calling asking for things, wanting a letter.

Answer. Uh-huh.

Question. I believe that was something that you mentioned. When you said "wanting a letter," what did you mean by that?

Answer. Well, he would want a letter to somebody welcoming them to Washington or he would want, you know, a letter to go to China with. You know, he liked paper and so he would ask you to write him a letter; I would like a letter from the chairman to this person saying welcome to the United States or something like that.

So, you know—he was always wanting an appointment and always wanting to come up and see the chairman and bring people up there.

Question. Before when he made these requests, was that something that the DNC and Chairman Fowler would usually try to take care of for him?

Answer. A request that somebody makes that doesn't—isn't real involved or real difficult, if it is a letter and there is nothing—no reason not to write that letter, usually we would take care of it for most anybody who asked.

But he asked so many—so much more often than anybody else that it was—you know, we became less inclined to jump.

Question. Did you discuss this at all with Chairman Fowler?

Answer. This particular thing?

Question. Yes, about your comments and that.

Answer. I don't remember. I don't remember.

Question. At the top of the letter, there is another handwritten note. It says—is that Rolf?

Answer. Rolf.

Question. R-O-L-F?

Answer. Uh-huh.

Question. Write a polite letter saying we are referring letter to Veep's office?

Answer. Yes.

Question. Dash, no commitment. D.

Who is that?

Answer. Don. That's Don Fowler.

Question. Don Fowler's handwriting?

Answer. Uh-huh.

Question. You don't recall have a conversation with him about whether you were going to help Johnny?

Answer. No. He probably saw my note, saw this letter and that was the disposition of it.

Question. This didn't come back to you, then?

Answer. No, I don't think so.

Question. It went to Rolf?

Answer. Yes.

Question. Who was Rolf?

Answer. He was a staff assistant in that office. He may have—in fact, I think he may have been the driver at this time and would do letters when he was in the office, and I think this is—this is a letter that he drafted. I can tell from his initials on it.

Question. What was Rolf's last name?

Answer. Olson.

Question. Olson. Okay. So you are talking about the first page of this, which is DNC 3263845?

Answer. Uh-huh.

Question. Do you know what, if anything, came of this request of Johnny Chung's?

Answer. No, I don't.

Ms. SAFAVIAN. Let me go ahead and mark this as Exhibit CK–13.

Mr. EGGLESTON. These are all pages?

Ms. SAFAVIAN. Yes.

Mr. EGGLESTON. All four pages, I guess?

Mr. EGGLESTON. Yes, 3263845 through 3263848.

[Khare Deposition Exhibit No. CK–13 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Moving on to another subject, can you tell me, when did you first meet John Huang?

Answer. I don't know. He had been at the DNC a little while, I think, when I finally met him, when—or when I first met him.

Question. He had been there prior to you——

Answer. He was there on the staff. I mean, I had sort of seen him around for awhile before I knew—actually knew who he was.

Question. So when you arrived at the DNC——

Answer. He was not there.

Question. He was not there?

Answer. No, no.

Question. Okay.

Answer. He came to work at the DNC in late '95 or early '96, and I had already been there awhile but I just happened not to meet him.

Question. Did you know that—did you know the circumstances surrounding his hiring at the DNC?

Answer. No.

Question. You were not involved in that at all?

Answer. No.

Question. Okay. Do you know whether or not John Huang ever set up any fund-raising events involving the President?

Answer. I know that he did.

Question. You know that he did?

Answer. Yes.

Question. Was this a usual occurrence for him? Was this one of his responsibilities?

Answer. Yes. Almost anybody in Finance would have had that responsibility, to set up events.

Question. Involving the President?

Answer. Yeah, or some involvement in it.

Question. Do you know if there ever came a point in time when he ceased preparing fund-raising events for the President?

Answer. No, I don't know that.

Mr. EGGLESTON. I think she said, or some involvement.

The WITNESS. Yes. I don't know whether he would have been the—in charge of an event or not, but everybody in Finance worked on events. So whether he was in charge of particular events, I know that I—I know now that he was but at the time, when all of this was going on, if you had said to me he does—he sets up events, I wouldn't have been surprised. But I don't know if somebody—if I actually knew specifically what his job was. He was a fund-raiser and that's what they did.

Question. Did you have much contact with John Huang?

Answer. Not a lot. I talked to him a few times and he would just stick his head in my office and say hello if he happened to be passing by. But I never knew him real well, and I didn't work directly with him.

Question. Were you ever in any of the staff meetings with Don Fowler where John Huang would have come up and it would have been discussed whether or not he should continue helping with fund-raising events or anything like that?

Answer. No.

Question. Would you have had any knowledge whether John Huang traveled outside the United States for fund-raising?

Answer. No, I don't—I don't have any knowledge that he did. I don't think I would routinely have been told something like that.

Question. That is not something that you would have been involved with?

Answer. No.

Question. Okay. Do you recall there came—do you recall when there came a point in time when John Huang—when he left the DNC?

Answer. Yes, I remember that.

Question. Okay. Do you recall the circumstances surrounding his leaving the DNC?

Answer. Well, he left after the election, and a lot of—a lot of fund-raisers left at that time. I mean, obviously he was in the thick of controversy himself right then, but that was a time when a lot of staff people left the DNC because the election

was over. And I didn't have any conversation with him about it or with anybody about it.

Question. Did you ever have any conversations with him regarding reports in the press that he had accepted foreign contributions?

Answer. With him? No.

Question. Did you have any conversations like that with Don Fowler?

Answer. There were meetings over there about that sort of thing, that I was in. So I wouldn't term them conversations but, you know, as people were becoming aware of that situation, you know, we had some senior staff meetings about it.

Question. Was this before or after John Huang left the DNC?

Answer. Probably both.

Question. When it was before he left the DNC, would Mr. Huang have been involved in those meetings?

Answer. No.

Question. Would he have been present?

Answer. No.

Question. Do you know who Roger Tamraz is?

Answer. Yes.

Question. And can you just tell me who he is?

Answer. Well, most of what I know about Roger Tamraz I have learned recently from media reports and that kind of thing. While I was at the DNC, I knew Roger Tamraz as—I didn't know him. I have never met him, but I knew his name because he was a donor.

Question. But you have never met him?

Answer. No.

Question. Did you ever have a conversation with him on the telephone?

Answer. No, not—not to my memory.

Question. Do you know if Tamraz—Mr. Tamraz ever met with Don Fowler?

Answer. I think that he did. I don't remember whether he met with him at the DNC or not.

Question. Do you know how often he met—the two of them may have met?

Answer. Not very—a few times, I guess.

Question. Do you know the purpose behind any of those meetings?

Answer. No.

Question. Did Don Fowler ever mention to you that Roger Tamraz was discussing an oil pipeline deal that he had?

Answer. No.

Question. Do you know whether or not Chairman Fowler ever offered his assistance to Roger Tamraz in meeting with Federal officials?

Answer. No, huh-uh.

Question. Do you recall a July 11th, 1995, meeting Chairman Fowler had with Roger Tamraz?

Answer. No.

Question. Let me show you this memorandum, which is to Don Fowler. It is from Alejandra Castillo dated July 12th, 1995 and it says regarding a meeting with Roger Tamraz. If you would just go ahead and look this over before we discuss it.

Ms. Khare, have you finished looking at it?

Answer. Yes.

Question. First of all, do you recall ever receiving this memorandum or seeing it before?

Answer. Yes.

Question. Would this have been something that you would have gotten while you were at the DNC or did you see it some other time?

Answer. Yes. And I have seen it recently, but, yes, I would have gotten it at the DNC.

Question. Okay. Can you tell me, first of all, who is Alejandra Castillo?

Answer. She was a young woman—is a young woman who at that time was preparing briefings for Don Fowler.

Question. Briefings? What do you mean by that?

Answer. Well, when he had a meeting with somebody, she would give him some notes on that person. If he were going on a trip, she would give him briefings about all the meetings on the trip, who was going to be in the meeting, what the politics of the—are and the place where he was going, that sort of thing. And she would research that—those things and talk to various other people and make him some notes so he would not go into situations cold; he would know what to expect.

Question. Okay. And the very last page of this, it shows that it was cc'd to both you and Ari Swiller?

Answer. Uh-huh.

Question. Who is Ari Swiller?

Answer. He was—he is someone who was a fund-raiser at the DNC. He was on DNC Finance staff.

Question. Okay. Do you know if there was any particular reason why Ms. Castillo would have prepared a memorandum on Roger Tamraz? I mean, did—was she asked to do one for this?

Answer. I don't know whether she was asked to do it or not.

Question. Do you know where she would have gotten this information from to prepare this memorandum?

Answer. No, I don't know. She may have told me at the time where she got it, but I don't know—I don't remember now if she did.

Question. Okay. And did you—was there a meeting held with Don Fowler, Ms. Castillo, yourself and Ari Swiller about this or——

Answer. No.

Question [continuing]. Was this memorandum just passed out?

Answer. No. I think it was just passed out.

Question. Do you recall having a conversation with Don Fowler about this memorandum?

Answer. No, I don't.

Question. Did you ever discuss this memorandum with Ms. Castillo or Mr. Swiller?

Answer. I am sure I discussed it with her. I am not sure whether I discussed it with him, with Ari Swiller.

Question. The first sentence, or the first few words of the first sentence, says, "Pursuant to your meeting with Roger Tamraz, Capitol Oil Incorporated, held on Tuesday July 11th," do you happen to recall this meeting that Roger Tamraz had with the Chairman on July 11th?

Answer. No, I don't.

Question. Okay. Would Ms. Castillo have been present at this meeting with Mr. Fowler and Mr. Tamraz?

Answer. That would be very unusual if she had been in there.

Question. Would Mr. Swiller have been present in this?

Answer. Yes.

Question. Do you know that for sure?

Answer. No, I don't, but that—usually if a donor was in there a person from DNC Finance would be in there.

Question. So the first paragraph, second sentence, states, quote, "As a potential managing trustee member, Mr. Tamraz' business dealing may potentially, if not definite, political and ethical implications on the DNC fund-raising operations."

Did Roger Tamraz discuss, do you know, with Chairman Fowler becoming a managing trustee?

Answer. I don't know whether he did or not.

Question. Did you have any discussions with anyone about Mr. Tamraz becoming a managing trustee?

Answer. No.

Question. Do you know whether Mr. Tamraz ever became a managing trustee?

Answer. No, I don't know.

Question. Continuing on in the first paragraph, it says, "I have had several conversations with Carol Khare and Ari Swiller regarding Mr. Tamraz' background."

Does that refresh your recollection?

Answer. I don't remember several conversations. I remember here is this memo; we talked about it. But—I remember maybe one conversation that is mentioned farther back in here prior to her doing this memo, but I don't remember anything else.

Question. Did you know anything about Mr. Tamraz' background before reading this memo prepared by Ms. Castillo?

Answer. Only what is mentioned back here about a Commerce Department friend of mine. That was all I knew about Roger Tamraz.

Question. Why don't we take a look at that. That's back on the last page, which is DNC 3116353. The first paragraph states, "Based upon the above-stated events, it is clear that Mr. Tamraz has several problems pending before the international business community. Among the more recent events concerning Mr. Tamraz is his bar from participating in a Commerce Department trade board. Open parenthesis, unofficial Carol Khare received warning from a DOC friend, closed parenthesis," end of the quote.

Did I read that correctly?

Answer. Yes.

Question. Okay. Who was the DOC friend that you received a warning from?

Answer. The young man who I knew before I came to Washington who worked at the Department of Commerce and who had worked at the DNC, then at the Department of Commerce and then came back to the DNC. His name is John Ost.

Question. I am sorry. Ost?

Answer. Ost, O-S-T.—had, I believe, seen Roger Tamraz' name on the Chairman's schedule, which the schedule was on the e-mail. So the staff knew where he was, who he was meeting with, that kind of thing.

Question. Do you mean he as in Mr. Ost?

Answer. He, Mr. Ost, had seen it on DNC e-mail, I think had seen the schedule, that Roger Tamraz was meeting with Don Fowler; and said to me, do you know who Roger Tamraz is? He was supposed to go on a trade mission with the Commerce Department and then at the last minute somebody found out something bad about him and he was taken off the trip.

Obviously, I relayed this to Alejandra before she did this memo. I don't remember that conversation, but obviously I did. And so that's what—that was my whole exposure to Roger Tamraz was that from John Ost. And he didn't know why Tamraz had been taken off the trip.

Question. I am sorry. Maybe I was confused. Were you saying that Mr. Ost was working at the DNC when——

Answer. He worked at the DNC. Then, after the '92 election, he went and worked at the Department of Commerce. Then, at some point, he came back and worked at the DNC. I don't know whether he was back in July or whether—I saw him occasionally, and he may have just been up there. He came—he had a lot of friends in the office and he would come up there sometimes, and so whether my conversation with him about Roger Tamraz happened while he was an employee of the DNC or an employee of the Department of Commerce, I don't know.

Question. Oh, okay. Because you had mentioned that he had seen the schedule of Don Fowler's.

Answer. Yes. He could—there were copies of it lying around so he might have just seen it or he might have been back on staff at that point. I just don't know.

Question. You didn't contact him, in fact, about Roger Tamraz?

Answer. No. He brought it up.

Question. Did he tell you anything else besides the fact that he was not allowed to go on this trip?

Answer. I think he told me that he didn't know why. That's my recollection, but I am not sure.

Question. Do you recall if you told this information to anybody else besides Ms. Castillo?

Answer. I don't remember doing that.

Question. Did you speak with Chairman Fowler about this?

Answer. If I did, I don't remember doing that.

Question. If you look at the first sentence of the next paragraph, under conclusion——

Mr. EGGLESTON. We are on the last page still?

Ms. SAFAVIAN. Yes.

EXAMINATION BY MS. SAFAVIAN:

Question. Quote, "In a conversation held with Ari Swiller yesterday, Mr. Tamraz expressed his desire to contribute $300,000 to the DNC."

Do you know whether Mr. Tamraz ever contributed this $300,000?

Answer. No. I believe he contributed to the DNC, but how much I don't know.

Question. You never had a conversation with Mr. Swiller about this donation?

Answer. If I did, I don't remember it.

Question. The very last paragraph, "Our association with Mr. Tamraz should be well defined, a difficult task given his complex business connections and political associations. His business background has proved to be full of significant financial and ethical troubles. Pay attention to these warning signals," exclamation point.

Did you have any discussions with Chairman Fowler concerning this warning from Ms. Castillo?

Answer. I don't remember that I did. I had a conversation with somebody who sort of reassured me that most of this was not—there was nothing to most of this and that Roger Tamraz was a fine person and could—it would be all right for him to donate to the DNC, but I do not believe that it was with Chairman Fowler.

Question. Do you recall who you had this conversation with?

Answer. No. I just remember not being concerned anymore about this memo.

Question. Did you think that Ms. Castillo was overreacting to what she had learned?

Answer. I think so. I think—that was how I felt about it.

Question. Did you inquire of other people—I mean, is that how this person responded to you and said, there is no need for you to worry about Mr. Tamraz?

Answer. Yes, I think that's what happened. But whether it was Ari Swiller or Richard Sullivan or somebody else, I just don't know.

Mr. YEAGER. Was Ms. Castillo a pretty junior member of the Chairman's office?

The WITNESS. Very junior.

Mr. YEAGER. Did she have any expertise in the Middle East or any of the things she expressed an opinion about in this memorandum?

The WITNESS. No.

EXAMINATION BY MS. SAFAVIAN:

Question. Are you aware of any meetings or conversations Chairman Fowler may have had with the National Security Council or the CIA regarding Roger Tamraz?

Answer. No, I am not.

Question. Do you know whether or not, after this memo——

Mr. EGGLESTON. Could I interject something? I take it, it is all as of that time. Since that time, obviously Chairman Fowler has testified.

The WITNESS. I have heard testimony, that kind of thing.

Ms. SAFAVIAN. Of course. I am asking for your knowledge.

Mr. EGGLESTON. Okay.

Ms. SAFAVIAN. Around the time when you received this message.

The WITNESS. Yes.

Mr. EGGLESTON. I assumed that. I wanted to make sure the record is clear you are not asking as of today.

Ms. SAFAVIAN. No, that's fine.

EXAMINATION BY MS. SAFAVIAN:

Question. Please let me know if your memory is from a news article or something like that?

Answer. Right.

Question. Do you know if after this memorandum came to you, if Chairman Fowler had any further meetings with Roger Tamraz?

Answer. I don't know.

Ms. SAFAVIAN. Let me mark this as Exhibit CK–14.

[Khare Deposition Exhibit No. CK–14 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. Ms. Khare, did you have any—was there any specific liaison between your office and somebody at the White House?

Answer. No, not any specific—if I needed something at the White House, I would usually call somebody in White House Political Affairs, because those were people that I knew and dealt with. We didn't have any official, if you want something from the White House you have to talk to this person—this person has to talk to this person. It was nothing defined.

Question. There wasn't any one person that you would contact more often?

Answer. No.

Question. Let me show you a November 20th, 1995, memorandum to Harold Ickes from Don Fowler, Marvin Rosen, Scott Pastrick and Richard Sullivan regarding additional DNC fund-raising requests. If you will just go ahead and take a look at that.

Ms. Khare, have you finished reading that?

Answer. Yes, I have.

Question. First of all, have you ever seen this memo before?

Answer. I think I have seen it recently but I haven't—I don't think that I saw it at the time.

Question. You don't recall being the one who would have prepared this memorandum for Mr. Fowler?

Answer. No, no. I am sure that I was not.

Question. Okay. In the fall of 1995, did you ever discuss with Chairman Fowler the need for the DNC to raise an additional $4 million?

Answer. Everybody discussed that. Everybody at the DNC was aware of the fund-raising efforts and what we were spending money on, that kind of thing. It was a huge push at that time.

Question. Is this from the staff meetings that would be held or was this just common knowledge of everybody?

Answer. Both.

Question. Okay. The top of the memo states that 18 to 20 calls will have to be made by POTUS, which is the President of the United States.

Answer. Uh-huh.

Question. Do you know who the President was to call to raise these funds?

Answer. No, I don't. I don't.

Question. There is also 10 calls by the VPOTUS, Vice President. Do you know who he would have been calling to raise these funds?

Answer. No, I don't.

Question. Were you involved at all in preparing any call sheets for either the President or the Vice President for fund-raising phone calls?

Answer. No.

Question. Do you know who would have been involved in preparing a list?

Answer. Someone in DNC Finance.

Question. Under that, it states that there will be a White House holiday dinner which will be an accountability event. Do you know what an "accountability event" means?

Answer. No, I don't—I don't know what that term means. I just noticed it when I was reading this, and I know I have seen this before, but I don't—I don't know.

Mr. YEAGER. I don't want to put this as an objection but I just want to note that it is not entirely clear that this is a plan.

Would you, Ms. Khare, characterize this as a proposal?

The WITNESS. Yes, I guess, because you don't send things over to the White House and tell them what they are going to do.

Mr. YEAGER. Thanks.

The WITNESS. You suggest.

Ms. SAFAVIAN. I am going to go ahead and mark this as Exhibit CK–15.

[Khare Deposition Exhibit No. CK–15 was marked for identification.]

EXAMINATION BY MS. SAFAVIAN:

Question. When you arrived at the DNC, were you aware of the DNC system for screening contributions or contributors?

Answer. That was something that was done by DNC Finance, and so I really was not particularly involved with that.

Question. Did you ever have any knowledge of that process?

Answer. I guess in conversations people might say something, you know, do you know anything about this person? Or we couldn't take money from this person for this reason. But I don't remember ever having a specific—being given a specific briefing on what that process was.

Question. And it was not anything that you were ever involved with?

Answer. It was not in my area at all.

Question. Was it any area—was anyone that you were supervising, any of the staff assistants, ever involved in having to do that?

Answer. No. No.

Question. Are you aware that the President attended a series of coffees held at the White House during 1995 and 1996?

Answer. Yes.

Question. Were the coffees with the President part of the DNC's major donor program?

Answer. I don't know if—that you would call them that because people were invited to those coffees who were not donors, and so—and people were not required to be donors in order to go to those coffees. So I don't guess you would call it a part of that.

Question. Were you involved at all in planning or preparing a list of attendees for any of these coffees?

Answer. No.

Question. Do you know who would be?

Answer. DNC Finance.

Question. Did those lists ever make their way to Chairman Fowler for his approval?

Answer. They usually—well, always before the event, at some point before the event, he would have a list of the people who were going to be there.

Question. Would that be a list of the DNC staff employees or——

Answer. Both, both. The guests, the—everybody who was going to be there, just because he likes to know who is going to be in the room before he walks in there.

But I don't think that he participated in—so much in making out the lists, although he may have suggested names. I don't know. He didn't do it through me.

Question. Okay. In any of the meetings, I mean, the staff meetings that were held, were these coffees ever brought up?

Mr. YEAGER. What meetings are you referring to again?

Ms. SAFAVIAN. I am sorry. The witness——

EXAMINATION BY MS. SAFAVIAN:

Question. You testified earlier that there were staff meetings at the DNC that you attended?

Answer. I guess they were. I guess they were mentioned but it was not a thing that we worked on in those meetings or debated in those meetings or anything.

Question. Okay. Do you happen to know what the purpose of these coffees were?

Answer. I don't know that I can define that purpose. I don't know that I was involved enough to define that purpose.

Question. Let me just show you and see if you have seen this before. This is a—I guess a memorandum or a scheduling memorandum. The document is Bates Stamped EOP 024249. If you will just take a quick look at that.

Answer. Uh-huh.

Question. Have you ever seen this document or something like this before?

Answer. No. I mean, I have seen things like this just because when there is an event you get something like this, or the chairman would get something like this, letting him know what—what the sequence of activities would be, that sort of thing. So I have seen something like this but I haven't seen this specific one, I don't think.

Question. Let me just state, I just noticed at the bottom of this document that there seems to be some sticker. It is typed BJT–6. I don't believe that that was part of the original document. That must have somehow gotten on it and it was copied. So don't let that distract you.

This is discussing a Presidential coffee. The date is May 7th, 1996. And the location is the White House. I am just interested in the purpose. It says, quote, "The purpose of this coffee is to raise funds for the Democratic National Committee," closed quote.

Would this be a way that the—would this be some way that the DNC would describe the purpose of these coffees?

Answer. I don't think so. I never heard them described that way. In fact, it was made pretty clear at the DNC that there was no admission charged to these coffees, that people were not asked for money in order to attend these coffees. So that is an unusual phrasing to me.

Question. Do you know who would have prepared this document? Is this something that the DNC would have prepared or the White House?

Answer. I don't know. I don't know who did this.

Question. Okay. You mentioned that it was made clear at the DNC that the coffees were not to raise funds?

Answer. Uh-huh.

Question. Is that correct?

Answer. They were—there was no cost of admission to the coffees.

Question. Okay. Who made that clear at the DNC?

Answer. Both the heads of finance and Chairman Fowler. I mean, the—I just—that was something you heard more than one time, that——

Mr. YEAGER. Counsel, I think she has testified, and I don't want to interfere too much with your questioning, but I think she has testified that she wasn't involved extensively in the coffees.

The WITNESS. No, I really was not. I mean, I was not.

EXAMINATION BY MS. SAFAVIAN:

Question. That's fine. Just because you had made that comment, I wanted to know who—you mentioned the finance Chairs. Who would they have been?

Answer. Richard Sullivan or Marvin Rosen and people like that.

Ms. SAFAVIAN. Okay. Let me, just because we discussed this, let me mark this as Exhibit CK–16.

[Khare Deposition Exhibit No. CK–16 was marked for identification.]

Mr. YEAGER. Could I ask that this—the reference in the lower left-hand corner be stricken. That appears to be taken from another deposition.

Ms. SAFAVIAN. Yes, absolutely. I would get a cleaner version, but since this was the version showed to you, I will make this an exhibit.

Mr. YEAGER. That's just to protect the identity of someone else who apparently testified at the deposition.

EXAMINATION BY MS. SAFAVIAN:

Question. Would you have seen any spreadsheets that would list the coffees and show projected funds that would have been received in response to the coffees or any in-hand amounts that the coffees generated?

Answer. I probably wouldn't have—something like that may have been around our office, but it was not something that I would have paid a lot of attention to it and studied and looked at. So I may have seen the document and not looked at it.

Mr. EGGLESTON. You don't actually remember such a document?

The WITNESS. No.

Mr. EGGLESTON. Just to make it clear.

EXAMINATION BY MS. SAFAVIAN:

Question. Would that have been something that you would have had to look at?

Answer. No, no.

Question. Would it have been something that you would have discussed with Chairman Fowler?

Answer. No.

Question. Would that have been something you would have prepared for a meeting?

Answer. Oh, no, I would not have been the one to prepare something like that.

Mr. EGGLESTON. Again, just so it is clear, she did not acknowledge that such a document even existed, I think.

The WITNESS. I guess—yeah, I don't recall any such document.

Mr. EGGLESTON. Okay.

EXAMINATION BY MS. SAFAVIAN:

Question. Who would normally, from the DNC, if there was a normal grouping of individuals, staff employees, would attend these coffees with Chairman Fowler?

Answer. I think Richard Sullivan went—I know that he went to some. I don't know if he went to all. Marvin Rosen, who was Finance Chair, went to some. I don't know if he went to all. And I can't think of anyone else who would have gone. There may have been some particular situation where another person went, but those are the ones that I know went to some of the coffees.

Now, that—but the idea was that they were small and not many staff people would have gone.

Question. Do you know if Chairman Fowler would follow up with any of the individuals who would have attended these coffees?

Answer. He probably sent everybody a letter. That would be the normal thing. Any meeting he was in, he would have sent—followed up with a letter.

Question. Is that something that you would have been involved in helping to prepare?

Answer. It would—no, I don't think so. Probably would have approved the letter, some basic letter.

Question. It would have been a standard letter?

Answer. Yes.

Mr. YEAGER. Would there have been a solicitation in that letter for funds?

The WITNESS. I doubt it. I doubt it. I just don't remember.

EXAMINATION BY MS. SAFAVIAN:

Question. Do you know if Chairman Fowler would follow up with any phone calls to these individuals who attended the coffees, after the coffees?

Answer. I can't say a specific one when he did, but I imagine so. I imagine that he did.

Question. And why do you say that?

Answer. Just because he always ends up having to deal with people after he has met with them, because he is just that kind of a person. But we did not have a routine in that he would go in and sit down and follow up—make follow-up calls, but I can't say that he didn't do it because he probably did call some of them.

Question. And you said he would always get the list of the attendees before he went?

Answer. Yes. Yes.

Ms. SAFAVIAN. I think I might be done, if you will just give me a moment.

Ms. Khare, that's all that I have. Minority counsel may have a few questions, and I will direct it to him for the moment.

Mr. YEAGER. If I could take a few minutes, counsel.

Mr. LU. Just off the record for a couple of minutes.

[Recess.]

EXAMINATION BY MR. YEAGER:

Question. Let's go back on.

Thank you, Ms. Khare, on behalf of all of the Democratic members of the committee for coming in today and taking time to give testimony. We appreciate your coming in voluntarily.

I have one question. I just want to take up where you had testified before, take you back to March of 1995, when Johnny Chung first called you from Maggie Williams' office, or the First Lady's office—it is not clear exactly—you testified that you didn't know who he was at that time.

Answer. Right.

Question. Isn't that right?

Answer. Uh-huh.

Question. You weren't aware that he had given contributions to the DNC——

Answer. No.

Question [continuing]. At that time?

Answer. I don't think that I was.

Mr. YEAGER. That's it. No further questions.

Ms. SAFAVIAN. We are all done. Thank you very much for coming in.

[Whereupon, at 3:55 p.m., the deposition was concluded.]

[The exhibits referred to follow:]

Katherine

March 1, 1995

9:30 AM

TO: ~~Kathleen~~
FR: Richard Sullivan/Ari Swiller
RE: Scheduling Request for Chairman Fowler for March 8th

Meeting requested by Johnny Chung, CEO Automated Intelligent Systems, Inc. Torrance, CA, DNC Managing Trustee

PREFERRED TIME Wednesday Afternoon, March 9th 8th * 10

BACKGROUND

Johnny contributed $94,000 to the DNC and raised an additional $40,000. $60,000 of this was for a DNC fundraising luncheon with the First Lady in Los Angeles on December 3rd, our first fundraiser after the November elections.

Johnny is a second generation Taiwanese American who started out as a computer salesman and formed his own faxcast company, AISI, three years ago. Johnny was named Los Angeles small businessman of the year by the LA NBC affiliate in 1994. His company, AISI does the faxing for many Democratic gubernatorial and senatorial candidates.

PURPOSE OF MEETING

Johnny also does a great deal of business/trade with China. He would like to bring in some of his fellow associates from China who are visiting DC next week for a courtesy meeting with the Chairman. They are all prominent businessmen and include the Chairman of the China Chamber of International Commerce and the Vice President of the China International Trust and Investment Corporation. His group will be meeting with Secretary Brown earlier in the day. Enclosed is the list and bios for the attendees.

Thursday
= 9:45 - 10:00AM

EXHIBIT
CK 1

DNC 1375878

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-3883 • Fax: (310) 328-4196

February 27, 1995
(Via Fax)

Mr. Richard Sullivan
DNC
(202)863-7187

Dear Richard,

How are you? I am going to need your help again. I am bringing with me the delegation from China. This is a group of very important and powerful business leaders from China. They will be in D.C. from 3/7 to 3/11 and will be staying at J.W. Marriott, (202) 393-2000, 1331 Pennsylvania N.W. Washington DC. Enclose please find the name list and their personal information.

As I have mentioned on the phone, their main purpose would be as follows:

1.) Meet President Clinton — Meet Don Fowler

2.) Meet Vice President Al Gore

3.) Have lunch at the Mess (White House)

4.) Tour the White House

5.) Meet Secretary Ron Brown

Please help me make arrangements accordingly. Thank you in advance for all your help. I will see you soon.

Sincerely,

Johnny Chung
Chairman/CEO

JC:iw
Encl.

EXHIBIT
CK 2

DNC 3233326

Name List of Delegation

1.) **Hongye Zheng**
Chairman, China Council for the Promotion of International Trade (CCPIT)
Chairman, China Chamber of International Commerce (CCOIC)

2.) **Huaren Sheng**
President, China Petro-Chemical Corporation

3.) **Jichun Huang**
Vice President, China International Trust and Investment Corporation

4.) **Renzhong Wang**
Vice Chairman & President, Shanghai AJ Shareholding Corporation

5.) **James J. Sun**
Young Entrepreneur of Xinjiang, self made multi-millionaire, Urumqi Taihe Industry Co.

Entourage

1.) **Jianlong Yu**
Chief, American & Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

2.) **Suxin Tang**
Secretary to Mr. Huaren Sheng

3.) **Jie Tang**
Interpreter, SINOPEC

AISI Representatives

1.) **Johnny Chung** - Chairman/CEO

2.) **Art Liang** - Managing Director/Executive V.P.

DNC 3233327

Resume

Zheng Hongye

Mr. Zheng Hongye was born in Harbin, Heilongjiang Province in September 1929. He was engaged in trade and economic affairs in the Northeast Region of China from 1947 to 1954; transferred to the China Council for the Promotion of International Trade(CCPIT) in 1955 and worked as Deputy Division Chief successively in the Department of Foreign Exhibition in China, Liaison Department and Department of Chinese Exhibitions Abroad; served as Commercial Councilor of the Chinese Embassy in Australia and then in Greece from 1973 to 1979; became Deputy Director and then Director of the Liaison Department of CCPIT in 1979; appointed Vice Chairman of CCPIT in 1981; served as Minister-Counsellor(Commercial) of the Chinese Embassy in Japan 1984; resumed his post as Vice Chairman of CCPIT after he returned from Japan in 1986; concurrently became Vice Chairman of the China Chamber of International Commerce(CCOIC) in 1988. He assumed the post as Acting Chairman of CCPIT and CCOIC since October 1989.

Mr. Zheng Hongye is a member of the Seventh and Eighth Chinese People's Political Consultative Conference, Chairman of the China International Economic and Trade Arbitration Commission, Chairman of the China Maritime Arbitration Commission, Chairman of the Economic and Trade Coordination Committee for the Two Sides of the Straits, Chairman of the Association of China Foreign Service Trade and a concurrent professor of Xiamen University. Mr. Zheng Hongye is also Chairman of the China Committee of the International Chamber of Commerce.

Sheng Huaren

Mr. Sheng Huaren, born in September 1935, is President of China Petro-Chemical Corporation, Chairman of China International United Petroleum and Chemicals Co. Ltd, and concurrently Vice Chairman of China-Korea Economic Council.

Mr. Sheng was born in Yancheng city, Jiangsu Province. He studied in Subei Cooperative Insititute for Cadres in Yangzhou city, Jiangsu Province in 1951. He used to be a statistician and plan-drafter in Subei General Cooperative Commune and the Finance and Econonmy Committee of Subei Administrative Office; apprentice, technician and deputy site director of Nanjing Construction Company; Deputy Director of the Long-term Planning Department in the Ministry of Combustible Chemical Industry and the Ministry of Petro-chemical Industry; Vice President of China Petro-chemical Corporation.

DNC 3233328

Huang Jichun

Mr. Huang Jichun, Director and Vice President of China International Trust and Investment Corporation(CITIC), was born in 1933. He graduated from the University of Northeast Technology, China in 1955 and attended the Executive Program in Business Administration(EPBA) of Columbia University, U.S.A. in 1989. Mr. Huang is acting also as a professor and senior engineer as well as the Executive Director of China Nonferrous Metals Society, a member of American Society of Metals and a member of Chinese Society of Investment.

In CITIC, Mr. Huang is in charge of investment and trade both at home and abroad as well as enterprise management.

Mr. Huang's professional capability is specifically excellent in the metal and material fields. He used to be responsible for the scientific and technical R & D, production management and foreign trade of nation-wide non-ferrous metals sector during 1983 to 1987 as Vice President of China National Non-ferrous Metals Industry Corporation. Mr. Huang was also heavily engaged in elaborating the long-term strategic plan for the scientific and technical development of the Chinese metallurgical industry while working in the Ministry of Metallurgical Industry from 1956 to 1982. He is very experienced in production, management and foreign trade and can manage English as a working language very well.

Wang Renzhong

7/1992-Present	Shanghai AJ Corporation, Shanghai Vice Chairman, President(C.E.O.)
11/1990-7/1992	Shanghai Patriotic Construction Corp. Vice Chairman, President
2/1986-11/1990	Shanghai Investment & Trust Corp. Board Director, Executive Vice President in charge of international trading, investment and other technology related business
1/1985-2/1986	Shanghai Investment & Trust Corp. Senior Vice President responsible for all international trading
2/1976-12/1984	Bureau of Aerospace Industry, Shanghai Director of Quality Assurance, Chief Production Engineer and Standing Member of Science and Technology Commission
3/1963-2/1976	Plant No.155 of the China Aviation Industry Ministry, Harbin

DNC 3233329

8/1952-3/1963	Plant No. 120 of the China Aviation Industry, Harbin Superintendent, Production Engineer
Technical Title:	Researcher
Education:	Graduate of the Yenching University, Beijing
Personal:	Born in China on May 1932, Married

DNC 3233330

Resume

James J. Sun

Mr. Sun was born on November 28, 1962 in Her Nan Province, China. He is the President of Xinjiang Taihe Enterprise Group Co. Ltd. and also a self made millionaire. He formed the Taihe Enterprise in 1990. Currently the Taihe Group consist of Taihe Real Estate Co, who's projects includes the four star Taihe Hotel in Urumqi, Taihe Kangle Developing Co. and Taihe Battery Co.

AISI Representatives

1.) **Johnny Chung** - Chairman/CEO

2.) **Art Liang** - Managing Director/Executive V.P.

3.) **Irene Wu** - Delegation Administrtor

4.) **George Liu** - Special Assistant to Chairman (East Coast)

5.) **David Chen** - Special Assistant to Chairman (Beijing)

6.) **Nancy Zhao** - Secretary to Chairman/CEO

MEMORANDUM

FROM: Betty Currie

DATE: March 28, 1995

Jon

2. Ceandra Scott called - She was concerned about Johnny Chung. She stated that we should have called them prior to their coming to the Radio Address. Apparently they were in Maggie's office when request came and Maggie said she didn't know, but to contact DNC --- I

NON-RESPONSIVE
MATERIAL
REDACTED

EXHIBIT
CK 3

EOP 000823

AISI

AUTOMATED INTELLIGENT SYSTEMS, INC

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel. (310) 328-3883 • Fax. (310) 328-4196

April 5, 1995
(Via Fax 202 863-8174)

Mr. Don Fowler
Chair
Democratic National Committee
430 S. Capitol St. S.E.
Washington, D.C. 20003

Dear Don,

I have an important issue here that needs your assistance. As you always know, I am 100% supportive of the DNC and I am always delighted to work with you on every occasion. The China Business Delegation led by Chairman Zheng Hongye met with President Clinton and took some pictures after the radio address on March 11, 1995. It's been over three weeks, I have not seen any of the pictures. I have learned from Mr. Richard Sullivan of DNC that the National Security Council is holding on to those pictures.

In my opinion, if we allow them to take the pictures with our President then we should be courteous enough to let them have the pictures. I am going to China next week and I do need to bring those pictures with me. I have run out of excuses to tell them why the pictures are taking forever. I really appreciate your help in solving this minor issue.

I look forward to seeing you this weekend at Mr. Steven Spielsberg's party. Thank you again for everything.

Sincerely,

Johnny Chung
Chairman/CEO
AISI

Thank you again!

JC:iw

CC: Ms. Carol Khare

EXHIBIT
CK 4

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 10:12 am
SENDER: Darby, Melanie B.
SUBJECT: Subject: PHOTOS? [UNCLASSIFIED]
TO: Hill, Roseanne M.
Roth, Stanley O.
Suettinger, Robert L.

CC: NO CC's on THIS MESSAGE

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese guys and the POTUSIS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):

HONGYE ZHENG
Chairman, China Council for the Promotion of Int'l Trade (CCCPIT)
Chairman, China Chamber of Int'l Commerce (CCOIC)

YAN SANZHONG
President, China Petro-Chemical Corporation

JICHUN HUANG
Vice President, China Int'l Trust and Investment Corp.

RENZHONG WANG
Vice Chairman and President, Shanghai Shareholding Corp.

JAMES J. SUN
Young Entrepeneur of Xinjiang, self-made multi-millionaire, Urumqi Talhe Industry Co.

JIANIONG YU
Chief, American and Oceanic Affairs Divison, Liaison Department, CCPIT & CCOIC

JOHNNY CHUNG
Chairman & CEO, AISI

Thanks very much for your help.

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 11:24 am
SENDER: Suettinger, Robert L.
SUBJECT: Subject: RE: PHOTOS? [UNCLASSIFIED]
TO: Darby, Melanie B.

CC: Roth, Stanley O.

The joys of balancing foreign policy considerations against domestic politics. . . I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the DNC, who am I to complain? Neither do I see any unalloyed benefit, either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide (present or former) Chinese officials, with the possible exception of James Y. Sun, "young entrepreneur and self-made millionaire." Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

But a caution -- a warning of future déjà vu. Having recently counseled a young intern from the First Lady's office who had been offered a "dream job" by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler, and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials. My concern is that he will continue to make efforts to bring his "friends" into contact with the POTUS and FLOTUS -- to show one and all he is a big shot, thereby enhancing his business. I'd venture a guess that not all his business ventures -- or those of his clients -- would be ones the President would support. I also predict that he will become a royal pain, because he will expect to get similar treatment for future visits. He will be persistent.

Bob

From: Darby, M. Brooke
To: @ASIA - Asian Affairs
CC: /R, Record at A1
Subject: PHOTOS? [UNCLASSIFIED]
Date: Friday, April 07, 1995 01:12 PM

An odd situation on which I need some guidance for the President's office asap.

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so).

EOP 005439

DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. Dodd
General Chair

OFFICE OF THE CHAIRMEN

PH 202-863-8121
FAX 202-863-8174

FAX COVER SHEET

DATE:_____ TIME:_____

TO: Johnny Chung

FAX:_____, # OF PAGES (including cover): 1

FROM: Carol Khare

SUBJECT: photo

IF YOU HAVE ANY TROUBLE WITH THIS TRANSMISSION,
PLEASE CALL _____ AT (202) 863-_____

COMMENTS: The White House assures me that you now have the pictures — hurray!! If you don't, give me a call. Have a good trip!

___ PLEASE VERIFY RECEIPT OF THIS DOCUMENT IMMEDIATELY

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED. THIS MESSAGE MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ADDRESS BELOW VIA THE U.S. POSTAL SERVICE. THANK YOU.

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EXHIBIT
CK 7

AUTOMATED INTELLIGENT SYSTEMS, II

2771 Plaza Del Amo • Suite #809 • Torrance CA 90503 • Tel. (310) 328-8585 • Fax. (310) 328-8881

May 8, 1995

Mr Don Fowler
National Chair
Democratic National Committee
430 South Capitol Street, S.E
Washington, D.C. 20003

Dear Mr. Fowler,

It was wonderful to see you again. I appreciate you and Carol making the time available for us to talk about the latest update from my recent trip to China. As you can see, good things are happening

I was glad to present to you an official invitation from the Chinese Government welcoming you and a group of DNC staff members to China. As you review your schedule for the upcoming months, hopefully dates for the trip over can be secured. In preparing a letter to Liu Shuqing, a prompt and courteous response will represent our government well. Therefore, I would be happy to review your reply letter before it is sent to assure the most favorable results.

Thank you for your efforts in helping to build a friendship between these two countries. I am glad that you are participating in this very important bridge-making process. I look forward to enjoying breakfast with you and the Vice President on Wednesday

Yours sincerely,

Johnny Chung
Chairman/CEO

cc: Carol Khare

EXHIBIT
CK 8

DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. Dodd
General Chair

July 24, 1995

Mr. Johnny Chung
Chairman & CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, Suite 809
Torrance, California 90503

Dear Johnny:

Thank you for your lovely gift on Friday. It is simply beautiful and it represents the beauty of the Chinese culture and our friendship.

Best of luck on your trip to China. I enjoyed meeting your friend who is the wife of the Chief of Staff of the Chinese Army. We all look to you for guidance and help over the coming months. Please let me know about your efforts to gain the release of Harry Wu.

Thank you again. I look forward to seeing you soon.

Sincerely,

Dm

Donald L. Fowler

DLF/dao

EXHIBIT
CK9

Democratic Party Headquarters • 430 South Capitol Street, S.E. • Washington, D.C. 20003 • 202.863.8000 • FAX: 202.863.8174
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DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. Dodd
General Chair

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny:

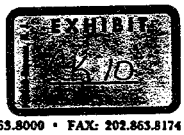
Thank you for stopping by my office; I really enjoyed meeting your guests. You are to be commended for your efforts to build a bridge between the people of China and the United States. I want to express my appreciation to you for being a friend and a great supporter of the DNC.

Good luck on your trip to China and please keep me informed. Thank you.

Sincerely,

Donald L. Fowler

DLF/aed



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DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. Dodd
General Chair

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny:

Thank you for stopping by my office; I really enjoyed meeting your guests. You are to be commended for your efforts to build a bridge between the people of China and the United States. I want to express my appreciation to you for being a friend and a great supporter of the DNC.

Good luck on your trip to China and please keep me informed. Thank you.

Sincerely,

Donald L. Fowler

DLF/aed

約翰老弟：

謝謝你來我的辦公室訪問，我非常高興能接見你的客人。
你為促進中美之間關係所擔任的橋梁角色值得稱贊。衷心感謝你
一直是民主黨的朋友及重要的支持者。

祝願你中國之行順利並隨時與我保持聯系。謝謝你。

民主黨主席　福勒

EXHIBIT

Democratic Party Headquarters • 430 South Capitol Street, S.E. • Washington, D.C. 20003 • 202.863.8000 • FAX: 202.863.8174
Paid for by the Democratic National Committee. Contributions to the Democratic National Committee are not tax deductible.

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To: Betty Currie	From: IRENE for Johnny Chung
Date: 7-25-95 Time:	For Information Call: (310) 328-3883
Fax Number: 202-456-2883	Total Pages Including This Cover Page: 3

Please have President Clinton write me a credential letter for my trip to China. I have enclosed a letter dated Oct. 3, 1994 which I can not use for this trip because its for Taiwan.

Thank you very much for your help!

PLEASE STAFF

Building The U.S. Fax Highway Today

2771 Plaza Del Amo Suite 809, Torrance CA 90503

EOP 005053

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny,

It was good seeing you again last week. I want to thank you for the essential role you play in bridging our diverse communities and your help with my Administrtion. Your efforts in helping to open communications between China and the United States are much appreciated.

Congratulations on a job well done.

Sincerely,

EOP 005054

BILL CLINTON

October 3, 1994

Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo
Suite 809
Torrance, California 90503

Dear Johnny:

Please let me extend my appreciation to you for your participation in my birthday celebration with your family on August 2nd. Your outstanding support and dedication to this Administration is benefiting Americans across the nation.

I also want to express to you how essential your role has been in helping to bridge our country' diverse communities. Your efforts to open lines of communication between our Administration and the Taiwanese American community are much appreciated.

Again, thank you for your support and for a job well done.

Sincerely,

Bill

4180

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To: Betty Currie	From: Johnny Chung
Date: 7-15-95 Time:	For Information Call: (310) 328-3883
Fax Number: 202-456-2883	Total Pages Including This Cover Page: 2

Reference letter from DNC. Thank You.

Building The U.S. Fax Highway Today

2771 Plaza Del Amo Suite 809, Torrance CA 90503

EOP 005056

DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. L
General C

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny:

Thank you for stopping by my office; I really enjoyed meeting your guests. You are to be commended for your efforts to build a bridge between the people of China and the United States. I want to express my appreciation to you for being a friend and a great supporter of the DNC.

Good luck on your trip to China and please keep me informed. Thank you.

Sincerely,

Donald L. Fowler

DLF/aed

January 30, 1996

Ms. Irene Wu
Manager/Vice President
Automated Intelligent Systems, Inc.

VIA FACSIMILE

Dear Irene:

Thank you for your letter regarding the request for a meeting between Vice President Gore and Professor Qu Geping. Certainly Professor Qu has some issues of considerable importance to discuss with the Vice President.

I have referred your letter to the Vice President's office. I know that the Vice President has a particularly hectic schedule right now, and thus it may be difficult to arrange a time. They will be getting back to you as soon as they make a decision.

Again, my thanks for your inquiry. Please give my best to Johnny. All best wishes.

Sincerely,

Don

Donald L. Fowler

DLF/rao

Democratic Party Headquarters • 430 South Capitol Street, S.E. • Washington, D.C. 20003 • 202.863.8000 • FAX: 202.863.8174
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AISI

AUTOMATED INTELLIGENT SYSTEMS, INC.

2771 Plaza Del Amo • Suite #809 • Torrance, CA 90503 • Tel: (310) 328-8585 • Fax (310) 328-8881

Rolf.
Will a polite ltr saying we are refuring the to Kerr's office - no comment
D

January 22, 1995

Mr. Don Fowler
DNC Headquarter
Washington, D.C. 20003
Fax: (202) 863-8174

Dear Mr. Fowler,

I would like to request your assistance in arranging for a meeting between Vice President Gore and Professor Qu Geping in the beginning of February. I have enclosed some background information on Professor Qu and Amwest Environmental Group.

Mr. Johnny Chung, our Chairman/CEO is still travelling out of town and he had instructed me to ask you for help in making the arrangement. I believe Vice President Al Gore had met briefly with Professor Qu before. He would like to have the opportunity to discuss further on the issue of environmental protection.

Please let me know if it's possible and when is the best time for their meeting. Thank you very much. I look forward to hearing from you.

Sincerely,

Irene Wu

Irene Wu
Manager/V.P.

Don —
I am inclined to ignore this — Johnny promised $50,000 in Nov. & another $100,000 in Dec. — none came
C.

DNC 3263846

AMWEST NEWSLETTER

Volume 2, No. 1 | 26 Centerpointe Drive, Suite 100, La Palma, Ca 90623-1054, U.S.A. | June 1994

Environmental News Update

Professor Qu Geping Accepted An Honorary Position From Amwest

Professor Qu Geping, one of the world most renowned leaders in the environmental field, has accepted the position of Honorary President of the Amwest Environmental Academy. The appointment was conducted on May 31, 1994 in the People's Congress Hall, Beijing, China (see picture on the right)

Professor Qu is the Chairman of the Environmental & Resources Protection Committee of the National People's Republic of China. He is also a member of the standing Committee of the National People's Congress, and a member of the UN Senior Advisory Board on Sustainable Development. His past assignments include Administrator of China Environmental Protection Agency, Chairman of China Environmental Science Association, Chairman of China Environmental Protection Industry Association, Professor of Beijing University, Qing-Hua University and Oxford University from UK. He is considered to be the founder of China environmental protection field, and the highest authority on China environmental protection. He obtained one of the UN highest awards on environmental protection. Professor Qu is also a world's famous environmental scientist and environmental educator. He has written over ten books and more than one hundred technical publications.

The Largest Solid Waste Recycling Project in China To Be jointly Developed By Beijing and Amwest

A joint venture agreement between Beijing City, China's capital, and Amwest Environmental Group was signed on June 1, 1994 (see figure on second page of this newsletter) to recycle solid waste generated in the Beijing City

Beijing City, with over ten million population, is currently generating approximately four million tons of solid waste annually. Meanwhile, about one hundred million tons of solid waste were generated in the past and have accumulated over two thousand dump sites scattered throughout the entire city. In the JV agreement, a total of approximately fifty recycling plants will be built with in the next five years. Wastes will be recycled into useful construction materials which is in a great demand in China. Amwest will jointly provide recycling technologies, design, construction, and will jointly operate these plants. Profits from the recycling operation (including tipping fee) will be shared by both parties

Professor Qu Geping accepted the position as Honorary President of Amwest Environmental Academy. (From left to right are):
Mr. Mike Morgan, Marketing Director, Amwest Environmental Group
Dr. James C. Lu, Chairman, Amwest Environmental Academy
Professor Qu Geping, Chairman of Environmental and Resource Committee of the National People's Congress
Professor William Fang, President of Amwest Environmental Academy.
Mr. Sun Jining, Director, Beijing Municipal Administration Committee

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Volume 2, No 1 — More News Update — June 1994

Asian Environmental Markets On the Rise

According to Asian Environmental Business, environmental markets will grow faster in Asia during the next decade than in any other part of the world. In some air pollution control segments, Asia already has the largest markets. For example, Asian utilities are expected to spend $10 billion for electrostatic precipitators in the next decade. The flue-gas desulfurization and boiler-water treatment systems markets also will be large. By 2020, the solid-liquid separation equipment market in China should increase to $3 billion annually from a 1993 base of $300 million.

According to Amwest's survey, the potential Asian environmental markets has already emerged in Taiwan. The environmental spending in the so-called "Six-Year National Development Plan" from 1991-1997 will be $37.46 billion US dollars. China will invest $60 billion US dollars for pollution control in its Eighth-Five Year Economic Plan. The Japanese environmental market is expected to grow at 15% per year with $10 billion US dollars per year estimated for 1994. The forecast for Hong Kong's environmental infrastructure expenditures for 1990-1999 will increase from $0.52 to 2.8 billion US dollars per year. Thailand has allocated 1.3 billion US dollars for environmental management. Bangkok is seeking a 700 million dollars in contracts for waste treatment. Several Thailand regional cities are planning upgrades to their existing waste management systems at an estimate of 236 million dollars, this does not include any private sector money. In Malaysia, exceeding 185 million dollars were allocated under the sixth Malaysian Plan to cleanup the environment. "The private environmental expenditure in Malaysia should exceed 90 million dollars in 1995. South Korea has implemented projects for industrial waste treatment and disposal of municipal sewage with a price tag in excess of 9 billion dollars.

Largest Air Toxic Reduction In U.S. History

The Clean Air Act Amendments designate 189 air toxics that EPA must regulate from a variety of industry by 2000. This final rule should reduce emissions of 112 of these toxics by 506,000 tons annually, an 88-percent reduction from current levels. An additional benefit will be decreased levels of volatile organic compounds by 1 million tons annually.

The final rule announced on March 1, 1994 affects approximately 370 chemical plants in 38 states.

Bigger U.S. EPA in 1995

In a time of tightening purse strings, the Clinton administration has proposed the largest EPA budget ever $7.2 billion for fiscal 1995, about 8 percent more than 1994 levels.

Export strategy Promotes Environmental Trade

President Clinton's National Export Strategy for Environmental Technology, released Nov. 22,1993, seeks to remove the barriers that hinder entry into the global market.
The strategy was developed in response to Clinton's April 1993 Earth Day directive to the departments of commerce and energy and EPA to assess competitiveness of U.S. environmental technologies.

The organization for Economic Cooperation and Development estimates that U.S. output in this industry was about $80 billion in 1990. Approximately 10 percent was exported and created a trade surplus of $4 billion. Research indicates that 20,000 U.S. jobs are created for every $1 billion worth of exports, the Department of commerce reported.

U.S. Environmental Consulting And Engineering Business

A recent study of 200 U.S environmental consulting and engineering firms conducted by Environmental Business International found that environmental consulting and engineering services in 1992 yielded revenues of $14.2 billion, about 11 percent of $134 billion in revenues generated by the overall U.S environmental services and equipment market in that year, the report says. Almost half of the consulting and engineering revenues were derived from the hazardous waste market, 22 percent from waste and wastewater, and 9 percent from air quality work. Although waste minimization and strategic environmental management services represent only a small percentage of total revenues, the report states, these areas promise to be the fastest growing markets in the near future, as raw materials and waste disposal costs continue to rise.

An influential group from Mexico discussing possible joint venture with Amwest in Mexico.
美西與墨西哥來的一個具影響力的集團談墨西哥之合作計劃。

DNC 3263848

MEMORANDUM

TO: Don Fowler, DNC Chairman
FROM: Alejandra Y. Castillo AC
DATE: July 12, 1995
Re: Meeting with Roger Tamraz

Pursuant to your meeting with Mr. Roger Tamraz, Capitol Oil Inc., held on Tuesday, July 11; I would like to forward to you some recently received background information on his business operations. As a potential Managing Trustee member, Mr. Tamraz's business dealing may potentially, if not definite, political and ethical implications on the DNC fundraising operations. I have had several conversations with Carol Khare and Ari Swiller regarding Mr. Tamraz's background. Please review the following memo, DNC Finance Department is pending your guidance on whether to continue our conversation with Mr. Tamraz and/or extend an invitation to participate in DNC events.

Roger Tamraz

Biographical Information:

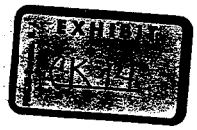
- Egyptian born and U.S. resident.
- Religion: Maronite Catholic
- Educated at the American University in Cairo, Cambridge University,England and at Harvard Business School, Massachusetts

Business Background:

- In the 1960's, Mr. Tamraz worked for the New York based investment firm of Kidder, Peabody in New York and Beirut.
- In 1974, he set up his own investment firm, First Arabian Corp., to invest the money of Middle East clients.
- Served as Bank Al-Mashrek Chairman--Lebanon's second Largest bank.
- In December of 1988, Mr. Tamraz was accused by the Lebanese authorities of siphoning an estimated $154 million out of the second-largest bank in Lebanon, Bank Al-Mashrek.
- During this time, Mr. Tamraz headed Jet Holding, owners of TransMediterreanean Airways (TMA-cargo specialist) and Middle East Airlines (MEA).
- Owner of TAMOIL, since the late 1980's, Mr. Tamraz has slowly sold or merged his holdings of TAMOIL. Among the big Tamoil buyers is Oilinvest, an overseas investment arm of Libya's National Oil Company Oilinvest's acquired the Milan-based Tamoil group of companies with operations in Italy and Spain.--Further explained in Event section.

Events: ***1980's***

- On March 6, 1989, the international press reported that Roger Tamraz had been kidnapped on Feb 19. However, a Beirut newspaper reported that Tamraz fled after a run on his bank and amid accusations he embezzled $200 million. Tamraz fled from the Christian east Beirut



to the Moslem-held western part seeking the protection of Moslem militia when judicial authorities issued a warrant for his arrest.

• While seeking safe haven in west Beirut it was reported that Hobeika, a former commander of the Lebanese Force--the main Christian militia, forced Tamraz to pay a $3 million he claimed was owed him after the collapse of the Bank Al-Meshrek. Hobeika is held responsible for the September 1982 massacre of hundred of Palestinian civilians by Christian militiamen in two Beirut refugee camps after Israel invaded Lebanon

• Tamraz was freed after paying the final installment of a $3 million ransom. However, Tamraz denied all news stories of ever having been kidnapped.

• Investors say the bank, under Tamraz direction, made shaky investments in Spanish real-estate, casinos in Portugal and a money losing cargo airline. Sources claim that Al-Mashreq bank ran into difficulties because Tamraz, who owned at the time 20 enterprises, had Al-Mashreq invest cash reserves to fund private businesses.

• Lebanon's Central Bank has had to fund the Al-Mashreq to prevent it from total collapse and bail out local depositors, a step which could have shaken the country's banking system. It was estimated that Al-Mashreq bank had a deficit of $100 million.

Events: 1990's

• Since the 1980's Tamraz has worked to revitalize his oil business in lieu of financial and political mishaps in Lebanon. TAMOIL, a leading oil company (refineries, gasoline stations) with holdings in Italy (5.3% of Italian Market) and Spain (---) have been slowly partitioned and sold during the last seven years to OILINVEST.

• Despite the Washington's freeze of Libyan assets and boycott of Libya-related companies, Tamraz aided OILINVEST, an overseas investment arm of Libya's National Oil Company, to continue a pattern of acquisitions in Italy during the 1980's. OILINVEST acquired 89.5 % equity in TAMOIL and a network of 1,945 service station as well as distribution centers throughout Italy. OILINVEST, through TAMOIL, bought 75% in Volcan Oil Milan.

• By 1992, Beirut bankruptcy court approved several offers to sell TMA, the cargo airline under Tamraz' s direction. The deal involved the payment of $8 million and the bank's taking responsibility for TMA's estimated $35 million debt incurred as part of Al-Mashreq bank financial crisis.

• Presently, Tamraz is Chairman of OIL CAPITAL INC. Oil Capital Inc has announced a new plan to build a large $2 billion pipeline through Armenia. It is expected that over 100 million barrels of oil per day will begin to flow from the two Caspian Projects Azerbaijan and neighbors, Kazakhastan and Turkmenistan, could have well over 100 billion barrels of oil, making them comparable to Iraq or Kuwait and potentially bigger than Alaska's Prodhoe Bay or North Sea.

• This Caspian deal is drawing Washington in. Washington is feeling the mounting pressures

DNC 3116352

from oil companies such as Amoco, Mobile, Exxon, McDermott, Brown & Root, Bechtel, and Chevron. The Clinton Administration is being pushed to alter its pro-Russia policy and start backing the republics in an attempt to push the deal forward.

Conclusions:

Based upon the above stated events, it is clear that Mr. Tamraz has several problems pending before the international business community. Among the more recent events concerning Mr Tamraz is his bar from participating in a Commerce Department Trade board (unofficial-Carol Khare received warning from a DOC friend).

In a conversation held with Ari Swiller yesterday, Mr. Tamraz expressed his desire to contribute $300,000 to the DNC. Indeed, his contribution is greatly appreciated and highly needed, however, his past involvement in shaky international business and para-military organizations may generate considerable problems for the DNC. Mr. Tamraz seeks political leverage to secure his oil ventures in the Russian Republics (Caspian Oil Project).

Our association with Mr. Tamraz should be well defined, a difficult task given his complex business connections and political associations. His business background has proved to be full of significant financial and ethical troubles. Pay attention to these warning signals!

I hope this memo has provided you with the information needed.

CC:

Carol Khare
Ari Swiller

November 20, 1995

TO: Harold Ickes
FR: Don Fowler, Marvin Rosen, Scott Pastrick and Richard Sullivan
RE: Additional DNC Fundraising Requests

The following information is submitted in response to information requested concerning the possibility of raising an additional 4 million to be applied to paid television. Because of the short lead time and lack of time to cultivate additional donors, we believe the following represents the maximum that can be raised prior to year end. (Additional to prior projections.)

POTUS

1. 18-20 calls by POTUS
   10 calls by VPOTUS

This will provide us with an advantage to assure our projections and assist in raising an additional $1.2 million.

2. One additional DC luncheon and one additional DC dinner.

These will raise a total of $1 million.

3. One White House Holiday Dinner

This dinner will be an accountability event for prior projections and commitments.

VPOTUS

1. Two events in any of the following cities. New York, New Jersey, Long Island or Philadelphia.

Each would raise $250,000 totalling $500,000.

FLOTUS

1. Two events in any of the following cities. New York, New Jersey or Long Island.

Each would raise $250,000 totalling $500,000.

SUMMARY

1. POTUS and VPOTUS Calls	1,200,000
2. POTUS DC Lunch	500,000
3. POTUS DC Dinner	500,000
4. White House Dinner	
5. VPOTUS Event	250,000
6. POTUS Event	250,000
7. FLOTUS Event	250,000
8. FLOTUS Event	250,000
TOTAL -	3,200,000

We believe $3,200,000 is the maximum we can raise.
* Of the 3,200,000, approximately 2,200,000 will be received by 12/31.

DNC 3234267

THE PRESIDENT HAS SEEN
5/7/96

DEMOCRATIC NATIONAL COMMITTEE
PRESIDENTIAL COFFEE

11:01a a. YAMIDE

Date: Tuesday, May 7, 1996
Location: The White House
The Map Room

Time: 9:00 a.m.

I. PURPOSE

The purpose of this coffee is to raise funds for the Democratic National Committee.

II. BACKGROUND

This group has been pulled together by Shelby Bryan. Chairman Fowler met with Shelby and Stan McLelland in February and discussed Shelby's hope of getting this group together. They are all new contributors to the DNC.

III. PARTICIPANTS

Please see attached list.

IV. PRESS PLAN

This event will be closed to the press.

V. SEQUENCE OF EVENTS

- Call Time. Chairman Fowler arrives and guest will be seated at table for coffee.

- PROGRAM
  - POTUS arrives
  - Chairman Fowler delivers brief remarks.
  - POTUS delivers informal remarks.
  - Departure after the program.

VI. REMARKS

Informal

EOP 024249

BJT - 6

JOHNNY CHUNG: HIS UNUSUAL ACCESS TO THE WHITE HOUSE, HIS POLITICAL DONATIONS AND RELATED MATTERS

FRIDAY, NOVEMBER 14, 1997

HOUSE OF REPRESENTATIVES,
COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
Washington, DC.

The committee met, pursuant to notice, at 12:25 p.m., in room 2154, Rayburn House Office Building, Hon. Dan Burton (chairman of the committee) presiding.

Present: Representatives Burton, McHugh, Horn, Souder, Pappas, Barr, Waxman, Lantos, Kanjorski, Maloney, Norton, Fattah, Cummings, Kucinich, and Turner.

Staff present: Kevin Binger, staff director; Richard Bennett, chief counsel; Dudly Hodson, chief investigator; Barbara Comstock, chief investigative counsel; Judith McCoy, chief clerk; William Moschella, deputy counsel and parliamentarian; Teresa Austin, assistant clerk/calendar clerk; Will Dwyer, director of communications; Ashley Williams, deputy director of communications; Dave Bossie, oversight coordinator; Robert Rohrbaugh, James C. Wilson, and Uttam Dhillon, senior investigative counsels; Charli Coon, Jennifer Safavian, Kristi Remington, and Bill Hanka, investigative counsels; Phil Larsen, investigative consultant; Jim Schumann, investigator; Robin Butler, office manager; Carolyn Pritts, David Jones, and John Mastranadi, investigative staff assistants; Phil Schiliro, minority staff director; Phil Barnett, minority chief counsel; Kenneth Ballen, minority chief investigative counsel; Agnieszka Fryszman, Kristin Amerling, Christopher Lu, Andrew McLaughlin, Michael Raphael, Michael Yang, and Michael Yeager, minority counsels; Harry Gossett, minority professional staff member; Ellen Rayner, minority chief clerk; Jean Gosa and Andrew Su, minority staff assistants; and Sheridan Pauker, minority research assistant.

Mr. BURTON. The committee will come to order. A quorum being present, we are now in session. Today's session is a continuation of yesterday's hearing regarding Johnny Chung and his unusual access to the White House.

Before I welcome our guests this morning, I would like to say that the questions which will be asked today will not in any way be taken from the interview we had with Mr. Chung this morning. We have agreed, Mr. Waxman, myself, our staffs and our colleagues, to keep the contents of that interview confidential and we will abide by that agreement.

We will be meeting with Mr. Chung later today to go into it further, but at this time, with our witnesses today, we will refrain from raising any issues that were raised in that confidential interview.

I would like to welcome Brooke Darby, former Executive Assistant to Nancy Soderberg at the National Security Council, and Robert Suettinger, former Director of Asian Affairs for the National Security Council.

We really appreciate your being here, and would you both stand to be sworn, please?

[Witnesses sworn.]

Mr. BURTON. On behalf of the committee, we welcome you here today. You will each be recognized, if you so desire, to give an opening statement of 5 minutes. If you have a statement that is longer than that, we will be happy to insert that into the record.

So with that, which one of you would like to go first?

Ms. DARBY. I have no statement to offer, sir.

Mr. SUETTINGER. Nor do I, Mr. Chairman.

Mr. BURTON. You do not have a statement?

Mr. SUETTINGER. I do not have a statement.

Mr. BURTON. OK. I guess we will start with our investigative counsel, Mr. Rohrbaugh. I will recognize you—incidentally, you have counsel with you?

Mr. SUETTINGER. Yes, we do.

Mr. BURTON. Would you like to introduce your counsel?

Mr. SUETTINGER. This is Mr. John Sparks from the National Security Council.

Mr. BURTON. Mr. Sparks, you are welcome to assist your clients in any way that you see fit.

Lt. Col. SPARKS. Thank you, Mr. Chairman.

Mr. BURTON. You are welcome as well.

STATEMENTS OF BROOKE DARBY, FORMER EXECUTIVE ASSISTANT TO NANCY SODERBERG AT THE NATIONAL SECURITY COUNCIL; AND ROBERT SUETTINGER, FORMER DIRECTOR OF ASIAN AFFAIRS FOR THE NATIONAL SECURITY COUNCIL, ACCOMPANIED BY LT. COLONEL JOHN SPARKS, DEPUTY LEGAL ADVISER, NATIONAL SECURITY COUNCIL

Mr. BURTON. Mr. Rohrbaugh.

Mr. ROHRBAUGH. Good morning, Ms. Darby, Mr. Suettinger, Mr. Sparks, we met out in the hall briefly. I introduced myself out there. My name is Bob Rohrbaugh, and I am just going to ask some questions of you today. Hopefully, we will try to be brief so the Members can go back home.

I am going to start with you briefly, Ms. Darby. Could you briefly tell me your educational background and your work experience?

Ms. DARBY. Yes, I graduated in 1992 from Mount Holyoke College.

Mr. BURTON. Ms. Darby, would you pull the microphone closer to you so we can hear you clearly? Thank you.

Ms. DARBY. Sure. I graduated in 1992 from Mount Holyoke College. I am currently pursuing a law degree in the evening division at Georgetown Law School.

My first job after graduating was working for the campaign in Little Rock, AR, the Clinton/Gore campaign, where I worked as a foreign policy assistant in the foreign policy office. I later joined the transition team, where I continued to work for Nancy Soderberg, who was director of the transition in Little Rock for foreign policy issues.

Thereafter, I joined the National Security Council staff working as Nancy Soderberg's special assistant and then later as her executive assistant.

Mr. ROHRBAUGH. Do you still work at the NSC?

Ms. DARBY. No, I don't. I currently work at the State Department in the Bureau of International Narcotics and Law Enforcement Affairs.

Mr. ROHRBAUGH. When you were employed at the NSC to whom did you report?

Ms. DARBY. Nancy Soderberg.

Mr. ROHRBAUGH. Who at the NSC would interact with the White House?

Ms. DARBY. Well, both of us interacted with the White House, and both of us had a number of people who we had worked with on the campaign who later got jobs in the White House, and they would frequently call us if they had any issues with foreign policy implications.

Mr. ROHRBAUGH. And you are familiar with an e-mail dated April 7th, which we are going to display at the present time?

Ms. DARBY. Very familiar, sir.

Mr. ROHRBAUGH. Very familiar with that. You have been deposed before; you are very familiar with that e-mail.

First of all, can you tell me what prompted your sending that e-mail of April 7th that appears in front of you?

Ms. DARBY. Yes, I was approached one evening by Kelly Crawford from the President's staff. She said—she basically conveyed the information that's in this e-mail, which is that there had been a radio address, approximately a couple weeks before. The Friday night before the radio address—the radio addresses are at 9 a.m. on Saturday mornings—the Friday night before the President's office had gotten a request from the DNC that the people on this list in the e-mail be invited to the radio address and they were invited.

And as a routine part of the radio address, the guests get their pictures taken with the President afterwards. It usually takes a couple weeks for those photos to be developed. Those photos had been developed and Johnny Chung was coming in to see Nancy Hernreich the following day to pick up the photos. And she conveyed to me that the President had some concerns about us perhaps not wanting the photos of him with the individuals circulating, and asked for our guidance on whether we should—whether the President's office should give Johnny Chung the photos when he came to Nancy Hernreich's office the following day.

Mr. ROHRBAUGH. And who asked for your guidance on that?

Ms. DARBY. Kelly Crawford.

Mr. ROHRBAUGH. In the past—before I get to that, prior to these individuals having actually come into the White House, had the NSC been asked to vet or check out these individuals?

Ms. DARBY. With respect to the radio address?

Mr. ROHRBAUGH. Yes, ma'am.

Ms. DARBY. Not that I'm aware of. She indicated to me that they had not—because of the lateness of the request, coming in on a Friday night before the radio address on Saturday morning, that contrary to their normal procedures they hadn't had an opportunity to check the names with us first.

Mr. ROHRBAUGH. OK. So it was the normal procedure that, especially when foreign nationals would come into the White House, the NSC would be asked to check or vet these people?

Ms. DARBY. Not necessarily. If anyone had a concern about any of the individuals involved, then they would contact us. But it was not routine practice for us to vet the names of people coming to a radio address, for example.

Mr. ROHRBAUGH. How often would this vetting be asked of the NSC by the White House?

Ms. DARBY. I don't think I probably handled all of the vetting, but in terms of my own participation in the vetting process, I would—it is hard to quantify it, but I would guess probably four to eight times a month. If I had to guess. But that really is just an estimate.

Mr. ROHRBAUGH. So it would not be unusual for the White House to actually ask the NSC to vet the people before they came in?

Ms. DARBY. That's right.

Mr. ROHRBAUGH. Now, on exhibit No. 196, that is in front of you, your e-mail.

[Exhibit 196 follows:]

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 10:12 am
SENDER: Darby, Melanie B.
SUBJECT: Subject: PHOTOS? [UNCLASSIFIED]
TO: Hill, Roseanne M.
Roth, Stanley O.
Suettinger, Robert L.

CC: NO CC's on THIS MESSAGE

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):

HONGYE ZHENG
Chairman, China Council for the Promotion of Int'l Trade (CCPIT)
Chairman, China Chamber of Int'l Commerce (CCOIC)

YAN SANZHONG
President, China Petro-Chemical Corporation

JICHUN HUANG
Vice President, China Int'l Trust and Investment Corp.

RENZHONG WANG
Vice Chairman and President, Shanghai AJ Shareholding Corp.

JAMES J. SUN
Young Entrepeneur of Xinjiang, self-made multi-millionaire, Urumqi Talhe Industry Co.

JIANIONG YU
Chief, American and Oceanic Affairs Division, Liaision Department, CCPIT & CCOIC

JOHNNY CHUNG
Chairman & CEO, AISI

Thanks very much for your help.

EXHIBIT
196

Ms. DARBY. Yes.

Mr. ROHRBAUGH. It starts off by saying "An odd situation" developed. Do you see that phrase?

Ms. DARBY. Yes, I do.

Mr. ROHRBAUGH. What was the odd situation that developed?

Ms. DARBY. The odd situation was that the President's office had some concern about these individuals and they hadn't come to us in advance to ask for our guidance before these individuals were invited into the White House.

And usually, if they had a concern about someone, they would make every effort to contact us first so we would have an opportunity to comment before the individuals were invited.

Mr. ROHRBAUGH. And if I can, in the second paragraph, it says they, which I believe refers to the President's office, "Did so, not knowing anything about them except that they were DNC contributors."

Did you know anything else about these individuals other than they were DNC contributors?

Ms. DARBY. I didn't know anything about them, sir. I tried to convey the information that Kelly Crawford had offered to me. I presume she used the term DNC contributors, because I would have had no independent basis for knowing whether they were or were not.

But I don't recall in detail what her words were to me other than what's written in this e-mail, which may or may not have reflected her exact words.

Mr. ROHRBAUGH. And if I can show you a larger version of the same exhibit, at the bottom paragraph it says, "for your information these people are major DNC contributors," and it goes on, which basically indicates that the President would like to give the photographs out, if possible.

From whom did you get the information that these individuals, the people that you listed, the Chinese delegation, were major DNC contributors?

Ms. DARBY. Again, I can only presume that that information was conveyed to me by Kelly Crawford because, again, I would have had no independent basis for knowing whether these people were contributors or not. Again, I'm not sure those were the exact words she used, but that was the impression that I got from her.

Mr. ROHRBAUGH. You sent this e-mail, I believe, to Mr. Suettinger, among others?

Ms. DARBY. Yes, I did. I sent it to the entire Asia Office, because it was something that required a prompt response, and I wanted to make sure that if Bob wasn't around, that someone in the office got it.

Mr. ROHRBAUGH. And I believe you sent it on April 7th at approximately 10:12 in the morning; is that right?

Ms. DARBY. That's what this e-mail would indicate, yes.

Mr. ROHRBAUGH. Did Mr. Suettinger respond to you?

Ms. DARBY. Yes, he did.

Mr. ROHRBAUGH. And how soon after you sent your e-mail did he respond to you?

Ms. DARBY. This e-mail indicates that he responded at 11:24, which would have been, I guess, about an hour and a half later.

Mr. ROHRBAUGH. And you are referring to exhibit No. 198 that shows Mr. Suettinger's response to you; is that correct?

[Exhibit 198 follows:]

CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 11:24 am
SENDER: Suettinger, Robert L.
SUBJECT: Subject: RE: PHOTOS? [UNCLASSIFIED]
TO: Darby, Melanie B.

CC: Roth, Stanley O.

The joys of balancing foreign policy considerations against domestic politics. . . I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung the pictures. And to the degree it motivates him to continue contributing to the DNC, who am I to complain? Neither do I see any unalloyed benefit, either. But as far as the other Chinese on the list are concerned, they all seem to be bona fide (present or former) Chinese officials, with the possible exception of James Y. Sun, "young entrepreneur and self-made millionaire." Got some doubts there. Notwithstanding that, these guys will all hang the pictures on the wall and feel grateful for a memory.

But a caution – a warning of future déjà vu. Having recently counselled a young intern from the First Lady's office who had been offered a "dream job" by Johnny Chung, I think he should be treated with a pinch of suspicion. My impression is that he's a hustler, and appears to be involved in setting up some kind of consulting operation that will thrive by bringing Chinese entrepreneurs into town for exposure to high-level U.S. officials. My concern is that he will continue to make efforts to bring his "friends" into contact with the POTUS and FLOTUS – to show one and all he is a big shot, thereby enhancing his business. I'd venture a guess that not all his business ventures – or those of his clients – would be ones the President would support. I also predict that he will become a royal pain, because he will expect to get similar treatment for future visits. He will be persistent.

Bob

From: Darby, M. Brooke
To: @ASIA - Asian Affairs
CC: /R, Record at A1
Subject: PHOTOS? [UNCLASSIFIED]
Date: Friday, April 07, 1995 01:12 PM

An odd situation on which I need some guidance for the President's office asap:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures. Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so):

EXHIBIT
198

EOP 005439

Ms. DARBY. 197.

Mr. ROHRBAUGH. OK, 197–198 are the same.

Ms. DARBY. Both. Yes. Yes.

Mr. ROHRBAUGH. Now, I will get into with Mr. Suettinger exactly what he responded, but based upon what Mr. Suettinger responded to you, what did you do?

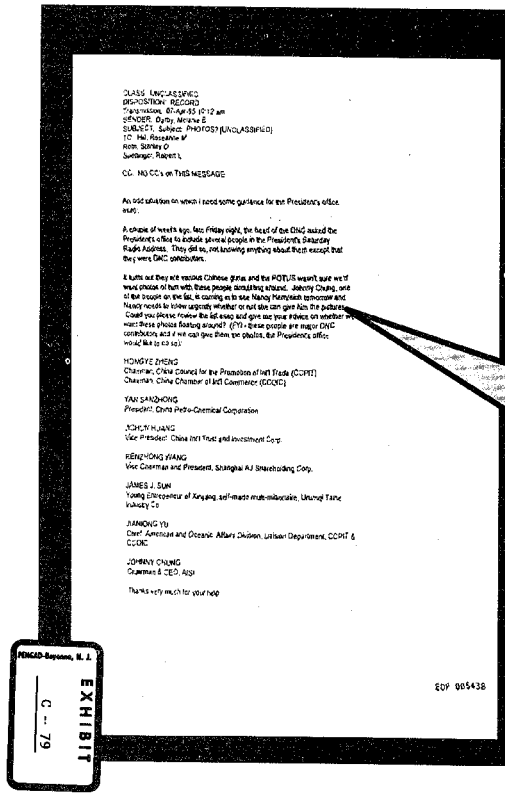
Ms. DARBY. I got back in touch with Kelly Crawford and I conveyed to her the nature of Bob's response. I believe I quoted pieces of the response back to her.

She's not—the White House and the NSC are on separate e-mail systems because our system is classified. So there was no way for me to directly send a copy of this on to her electronically. But I believe I conveyed the substance of it to her and gave her an opportunity to pick up a copy of the text of the e-mail if she wanted it. And I don't recall whether she picked it up from me or not.

Mr. ROHRBAUGH. In front of you is the larger version, exhibit C–79, of Mr. Suettinger's response, and it indicates that he, referring to Johnny Chung, is a hustler. That's Mr. Suettinger's quotation, I believe, that has now become rather famous.

Did you relay that information on to Kelly Crawford?

[Exhibit C–79 follows:]



CLASS: UNCLASSIFIED
DISPOSITION: RECORD
Transmission: 07-Apr-95 10:12 am
SENDER: Darby, Brooke B.
SUBJECT: Subject: PHOTOS? [UNCLASSIFIED]
TO: Hal, Rosalind M
from: Sidney O
Suettinger, Robert L

CC: NO CC's on THIS MESSAGE

An odd situation on which I need some guidance for the President's office, etc.:

A couple of weeks ago, late Friday night, the head of the DNC asked the President's office to include several people in the President's Saturday Radio Address. They did so, not knowing anything about them except that they were DNC contributors.

It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around. Johnny Chung, one of the people on the list, is coming in to see Nancy Hernreich tomorrow and Nancy needs to know urgently whether or not she can give him the pictures.
Could you please review the list asap and give me your advice on whether we want these photos floating around? (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so)

HONGYE ZHENG
Chairman, China Council for the Promotion of Int'l Trade (CCPIT)
Chairman, China Chamber of Int'l Commerce (CCOIC)

YAN SANZHONG
President, China Petro-Chemical Corporation

XICHUN HUANG
Vice President, China Int'l Trust and Investment Corp.

FENZHONG XIANG
Vice Chairman and President, Shanghai AJ Shareholding Corp.

JAMES J. SUN
Young Entrepreneur of Xinyang, self-made multi-millionaire, Unirungi Trade Industry Co

JIANHONG YU
Chief American and Oceanic Affairs Division, Liaison Department, CCPIT & CCOIC

JOHNNY CHUNG
Chairman & CEO, AISI

Thanks very much for your help

EOP 005438

PENGAD-Bayonne, N. J.
EXHIBIT
C -- 79

"It turns out they are various Chinese gurus and the POTUS wasn't sure we'd want photos of him with these people circulating around ... (FYI - these people are major DNC contributors and if we can give them the photos, the President's office would like to do so)"

Electronic mail between NSC staffers Brooke Darby and Robert Suettinger, April 7, 1995

Ms. DARBY. I believe I did so. That would have been a major piece of information that she would have needed. So I believe I—I don't have a specific recollection of passing that on, but I'm quite sure that I would have.

Mr. ROHRBAUGH. Did you make a recommendation to Ms. Crawford as to whether or not these photographs should be released?

Ms. DARBY. I believe I gave her a personal recommendation that we probably would not recommend that they release them.

Mr. ROHRBAUGH. OK. Now, in Mr. Suettinger's e-mail, he generally indicated that he didn't think there would be a major problem. But you took it upon yourself to recommend that the photographs not be released?

Ms. DARBY. It was not a strong recommendation on my part. Ultimately, there was nothing in Bob's e-mail that conveyed to me that Johnny Chung or any of the individuals involved represented a national security risk or that they were criminals of any kind. But given that, my impression from his e-mail was that he would perhaps attempt to exploit his contacts with the President through these photos, that it might be better to err on the side of caution and not give them to him.

But it didn't pose a serious security risk, and that is what she came to us to give a recommendation on.

Mr. ROHRBAUGH. Prior to your making that recommendation, did you contact or talk with your supervisor, Ms. Soderberg?

Ms. DARBY. Not that I can recall.

Mr. ROHRBAUGH. So it was basically your personal recommendation that you passed on that the photographs not be released?

Ms. DARBY. Yes.

Mr. ROHRBAUGH. Mr. Suettinger, let me just address a few questions to you. Can you briefly tell me what your background is and where you're presently employed?

Mr. SUETTINGER. You want my educational background?

Mr. ROHRBAUGH. Yes, please.

Mr. SUETTINGER. I graduated from Lawrence University in Wisconsin in 1968. After a stint in the military, I attended graduate school at Columbia University, where I received a master's degree.

In 1975, I joined the Central Intelligence Agency as an analyst, principally on Chinese matters, and had several different jobs within the agency and at the State Department. In 1994, Mr. Stanley Roth asked if I would assist him at the National Security Council, which I did, beginning in 1994, and continuing until late September 1997.

I am currently employed at the National Intelligence Council, which is located in Langley.

Mr. ROHRBAUGH. So for the period of roughly 1994 through 1997 you were at the NSC?

Mr. SUETTINGER. That's correct.

Mr. ROHRBAUGH. At the White House. And can you tell me when the first time was that you heard of Johnny Chung?

Mr. SUETTINGER. I can't give you a specific date, because my first contact with Mr. Chung, I believe, was via a telephone call that he made to the National Security Council requesting a meeting with Mr. Roth.

Again, I cannot remember either the specific context of that telephone call or whether it was repeated, but I know that his name was familiar to me when it came up later on.

Mr. ROHRBAUGH. Have you ever met Mr. Chung?

Mr. SUETTINGER. I have not.

Mr. ROHRBAUGH. And approximately how many times have you spoken to Mr. Chung, then?

Mr. SUETTINGER. I would guess at most two, perhaps three. He was somewhat persistent, as I recollect, in trying to get a meeting with Mr. Roth, he and a couple of other people, and I fended off those requests.

Mr. ROHRBAUGH. Let me refer your attention to exhibit No. 250, which is in your book, and it is an e-mail dated February 2, 1995, from Calvin Mitchell. Did you get a copy of that e-mail?

[Exhibit 250 follows:]

CLASS: UNCLASSIFIED
DISPOSITION: NON RECORD
Transmission: 02-Feb-95 05:11 pm
SENDER: Mitchell, Calvin A.
SUBJECT: Subject: China Chamber of International Commerce [UNCLASSIFIED]
TO: Hill, Roseanne M.
Roth, Stanley D.
Suettinger, Robert L.

CC: NO CC's on THIS MESSAGE

Bob/Stan:

I have met several times a Mr. Johnny Chung, who is a big Clinton supporter. He has told me that Mr. Zheng Hongye, Chairman, China Chamber of International Commerce, China Council for the Promotion of International Trade, the China Member Committee of the Pacific Basin Economic Council, will be travelling to the US sometime this spring. If Johnny contacts me again to meet this guy, I'll let you all know.

EXHIBIT
250

EOP 039319

Mr. SUETTINGER. Yes, I do.

Mr. ROHRBAUGH. In that particular e-mail it indicates that there would be, the chairman of the Chamber of International Commerce might be coming to see the President. Did you know who—first of all, had you ever heard of that organization, the Chamber of International Commerce?

Mr. SUETTINGER. I had not.

Mr. ROHRBAUGH. Did you know the individual who was listed in that particular e-mail?

Mr. SUETTINGER. His name is vaguely familiar to me.

Mr. ROHRBAUGH. And that was through your employment?

Mr. SUETTINGER. That's correct.

Mr. ROHRBAUGH. At that time, which is February 2, 1995, did you undertake any type of investigation or vetting of this particular individual who is listed on this e-mail?

Mr. SUETTINGER. I did not.

Mr. ROHRBAUGH. And I won't pronounce the name. I will leave that to you.

Mr. SUETTINGER. Zheng Hongye.

Mr. ROHRBAUGH. And why was it that you did not do any investigation or vetting of Mr. Chung at that time?

Mr. SUETTINGER. First of all, at that time, this was just a heads-up, rather than a request that this individual would be vetted. I didn't—and, quite frankly, I had not even remembered the existence of this e-mail until it was brought to my attention earlier this week as an FYI. I just basically disregarded it.

Mr. ROHRBAUGH. Are there resources at the NSC which would permit the NSC to actually vet individuals?

Mr. SUETTINGER. There are some at the NSC and some available via other means, phone calls and so forth.

Mr. ROHRBAUGH. OK. And without getting into any classified information, those resources were readily available to you at the NSC?

Mr. SUETTINGER. That's correct.

Mr. ROHRBAUGH. OK. When did you first become aware that Mr. Chung intended to bring a Chinese delegation into the White House?

Mr. SUETTINGER. I was not aware of that until Ms. Darby wrote me the e-mail.

Mr. ROHRBAUGH. So the first time you heard about that at all is when Ms. Darby sent you that e-mail?

Mr. SUETTINGER. That's correct.

Mr. ROHRBAUGH. And, again, just for the record, let me show you exhibit No. 196, and that's the e-mail that you received from Ms. Darby?

[Note.—Exhibit 196 may be found on p. 715.]

Mr. SUETTINGER. Yes, it is.

Mr. ROHRBAUGH. To your knowledge, had anyone at the NSC or the White House or anybody else vetted these individuals prior to their coming into the White House?

Mr. SUETTINGER. I'm not aware of that having been done.

Mr. ROHRBAUGH. And as you know, maybe you don't, the Secret Service does a criminal background check before individuals come into the White House. Is that right?

Mr. SUETTINGER. I don't know whether they do them for people from foreign countries. Certainly I know they do that for domestic visitors.

Mr. ROHRBAUGH. And, to your knowledge, that's the extent of the background that the Secret Service does on individuals coming into the White House?

Mr. SUETTINGER. I really am not qualified to comment on that, sir.

Mr. ROHRBAUGH. I understand it—well, is one of the purposes of vetting a person, to use that Washington term, actually to protect the President and the President's reputation?

Mr. SUETTINGER. My understanding of the process is that it is to make sure that people who have criminal records or who are intelligence personnel or who are otherwise considered for whatever reason unsavory characters are not put in the proximity of the President.

Mr. ROHRBAUGH. Let me refer you to your e-mail, which is exhibit 198. Is that your response to Ms. Darby's e-mail?

Mr. SUETTINGER. Yes, it is.

Mr. ROHRBAUGH. In your response, you indicate that all the Chinese on the list, with one possible exception, appear to be bona fide present or former Chinese officials. How did you come to that conclusion?

Mr. SUETTINGER. I came to that conclusion, one, by recognizing some of the names in the list; or by looking them up in a directory, an unclassified directory of Chinese officials that I had available to me; or, three, by determining that the organizations that they worked for were organizations that I recognized, I had heard the names of before, and seemed to be bona fide organizations in China.

Mr. ROHRBAUGH. And I believe there was one exception in your e-mail; is that right?

Mr. SUETTINGER. That's correct.

Mr. ROHRBAUGH. And who was that?

Mr. SUETTINGER. That was Mr. James Sun, who was described as a self-made millionaire from Xinjiang province. I had no record of him nor any way of checking on him.

Mr. ROHRBAUGH. Was that the reason why you had some suspicions or some concerns about Mr. Sun?

Mr. SUETTINGER. Well, the other reason was that there are relatively few self-made millionaires in the People's Republic of China. So that term would be—was somewhat jarring and kind of grabbed my attention.

Mr. ROHRBAUGH. Let me show you a portion of a videotape.

[Video tape presentation was shown.]

Mr. ROHRBAUGH. The last individual on that tape, I hope that you heard, Mr. Chung introduced him as being his brother. Had you ever heard that Mr. Sun was Mr. Chung's brother?

Mr. SUETTINGER. No, I had not.

Mr. ROHRBAUGH. Do you have any information one way or the other as to whether, in fact, Mr. Chung and Mr. Sun are brothers?

Mr. SUETTINGER. I have no information to that effect. Chinese often refer to close friends as brothers.

Mr. ROHRBAUGH. Had you ever seen this videotape prior to coming in today?

Mr. SUETTINGER. I had not.

Mr. ROHRBAUGH. One of the individuals in the Chinese delegation was described as the vice president of CITIC; is that right?

Mr. SUETTINGER. That's correct.

Mr. ROHRBAUGH. And who was that individual?

Mr. SUETTINGER. That is Mr. Huang Jichun. Or Jichun Huang, as it's written here.

Mr. ROHRBAUGH. Is CITIC an entity that is at least partially controlled by the State Council of the PRC?

Mr. SUETTINGER. I believe that's correct.

Mr. ROHRBAUGH. And do you know approximately what percentage is owned supposedly by the State Council of the PRC?

Mr. SUETTINGER. I do not.

Mr. ROHRBAUGH. And what is the State Council of the PRC?

Mr. SUETTINGER. The State Council is the official governing organ of the People's Republic of China. It is headed by the Premier and is in charge of all the Government ministries and many other organizations within the People's Republic.

Mr. ROHRBAUGH. Now, if I can, let me jump ahead to another incident that occurred in 1996 involving Wang Jun, do you remember that incident?

Mr. SUETTINGER. I do.

Mr. ROHRBAUGH. OK. Mr. Wang Jun, who was the purported arms dealer, was also involved in CITIC; is that right?

Mr. SUETTINGER. I believe he's the chairman of CITIC.

Mr. ROHRBAUGH. Back in 1995, after you got the list of names from Ms. Darby, did the fact that the vice president of CITIC was seeing the President, did that cause you any concern?

Mr. SUETTINGER. It did not.

Mr. ROHRBAUGH. Let me go back to your e-mail, exhibit No. 198. In your e-mail you indicate, but a word of caution, a warning of future déjà vu, and you indicate that Mr. Chung should be treated with, quote, a pinch of suspicion, unquote.

What did you mean by that?

Mr. SUETTINGER. As I spelled out subsequently in the e-mail, I was concerned that Mr. Chung might have been making use of his political connections to further his own business interests. And I was concerned that those business interests were not known to many people and that they might not be of the sort that the President would want to be associated.

Mr. ROHRBAUGH. Did you ever find out or learn of the various entities that Mr. Chung was involved in?

Mr. SUETTINGER. I did not.

Mr. ROHRBAUGH. And I believe in that same paragraph you also used that infamous term, hustler; is that right?

Mr. SUETTINGER. That's correct, sir.

Mr. ROHRBAUGH. And was that for the same reason?

Mr. SUETTINGER. Basically, yes.

Mr. ROHRBAUGH. Now, I just asked you about whether you were aware of some of the entities that Mr. Chung was involved with. Were you aware that just prior to Mr. Chung giving the DNC a

$50,000 contribution, he had received through the bank of China-Beijing $150,000?

Mr. SUETTINGER. I was not aware of that.

Mr. ROHRBAUGH. Let me, if I can, just show you quickly, exhibit No. 175. Exhibit No. 175 is a wire transfer from the Bank of Beijing, and at the bottom indicates payment of goods Haomen Group, Shan Tang. Do you see that?

[Exhibit 175 follows:]

AUTOMATED FUNDS TRA
RECORD OF TRAN

PRINTER PRT 1 SEQUENCE 027

mode	status	mdc	error-intercept
PROD	INCOMING MSG		

DATE rcvd	type	as-of-date	as-of-reason	ref-input-key
322070019	1000			

FROM ndr	REF	reference #	AMOUNT	amount	special-hndl-instr
021000021		5065700044770100		$150,000.00	

ORDERING BANK AND RELATED DATA

CHASE NYC /ORG=WINLICK INVESTMENT LTD. /OGB=BKCHCNBJ

CA FEDL BK LA /CTR/ BBK=CALIFORNIA FEDERAL BANK F.S.B.410 LOS CERRITOS

CENTER CERRITOS CA BNF=JOHNNY CHLING18401 NORWALK BLVD. 310-809-5305ARTESIA

90701/AC-[redacted] RFB=TT10A0684 95 OBI=PAYMENT FOR GOODS HAOMEN GROUP TANG

SHAN CHINA BBI=CHASE NY REF 5065700044770100

MESSAGE ACKNOWLEDGMENT OUTPUT UTC INPUT

0306L2LFF21C00002703060930FT01 0306B1Q8704C00151103060930FT1B

memo: BR082 003-082-010 Los Cerritos

DISTRIBUTION WHITE - Originating, Dept/Branch CANARY - Br. Recon. PINK - Cust Ins

EXHIBIT

175

N 0202

Mr. SUETTINGER. I only see—yes, I see that. Is it Tang Shan?

Mr. ROHRBAUGH. Tang Shan, I'm sorry.

Mr. SUETTINGER. S-H-A-N? I don't have that on my screen.

Mr. ROHRBAUGH. OK. Are you familiar with what the Haomen Group is?

Mr. SUETTINGER. No, I'm not.

Mr. ROHRBAUGH. Are you familiar with the fact that in December 1994, Mr. Chung had brought to the White House, I believe it was the president of the Haomen Group?

Mr. SUETTINGER. I was not aware of that at the time. I'm aware of it now. I did not associate the term Haomen with those individuals.

Mr. ROHRBAUGH. Do you presently or at the time in April, when you wrote your memo, did you know whether Mr. Chung had actually, and I hate to use the term, sold the Haomen Group any goods?

Mr. SUETTINGER. I was not aware of it.

Mr. ROHRBAUGH. Let me ask you a couple more questions about, if I can go back to exhibit No. 198. Your e-mail continues by stating, the joys of balancing foreign policy considerations against domestic politics. Did you often have to do that at the National Security Council?

Mr. SUETTINGER. No.

Mr. ROHRBAUGH. What did you mean by that term?

Mr. SUETTINGER. The situation was that these individuals had come in without my being aware of it. We were being asked as a matter of domestic policy and, in particular, DNC policy, to make a judgment call as to whether or not photographs should be given. That was not a task that I relished.

Mr. ROHRBAUGH. Why not?

Mr. SUETTINGER. I simply considered it to be outside the scope of my own responsibilities.

Mr. ROHRBAUGH. How much weight did the DNC carry when it came to deciding who would meet with the President?

Mr. SUETTINGER. I can't answer that question.

Mr. ROHRBAUGH. After your warning of April 8th, do you know how often Mr. Chung would then go into the White House?

Mr. SUETTINGER. I did not know that at the time. I have obviously learned it subsequently from newspaper accounts.

Mr. ROHRBAUGH. So you are aware that it would be approximately 20 additional times he entered the White House even after your November 8, 1995, warning?

Mr. SUETTINGER. I'd have to take your word for that.

Mr. ROHRBAUGH. Were you also aware that in July 1995, or did you become aware in July 1995 that Mr. Chung was attempting to negotiate the release of Harry Wu?

Mr. SUETTINGER. I did become aware of that.

Mr. ROHRBAUGH. And how did you become aware of that?

Mr. SUETTINGER. I received, in fact in two separate copies, some correspondence from the Chief of Staff's Office, I believe, I'd have to refer to the documents in particular, indicating that Mr. Chung had sought some credentials from the DNC to undertake this kind of mission.

Mr. ROHRBAUGH. Let me show you exhibit No. 251. It's a memorandum from Janice Enright at the Office of the Chief of Staff of the President, to Anthony Lake. Did you ever see that document before?

[Exhibit 251 follows:]

URGENT

THE WHITE HOUSE

WASHINGTON

PLEASE STAFF

24 July 1995

MEMORANDUM TO ANTHONY LAKE

FROM JANICE ENRIGHT
Office of the Chief of Staff

RE HARRY WOO

I received a telephone call this morning from Bobby Watson, the chief of staff at the Democratic National Committee ("DNC") concerning the release of Harry Woo.

Apparently, Johnny Chung, a DNC Trustee, is traveling with a group of people to China and meeting with the President of China this week. His mission is to negotiate the release of Harry Woo

Mr. Watson wanted to alert us that Mr. Chung plans to represent to the President of China that he is sanctioned by President Clinton in his efforts to get Mr. Woo released. He bases this representation on the fact that he recently saw the President during his trip to California and mentioned to him (I believe on a photo line) what he was doing in this regard. Apparently, the President was supportive. To what extent, is unclear but, nevertheless, it is being construed as a validation and will be represented that way to the President of China.

Please let me know if you need any additional information. I can be reached at 4-2459

cc: Bobby Watson

003626

EXHIBIT
251

Mr. SUETTINGER. Yes, I have.

Mr. ROHRBAUGH. And when did you see it?

Mr. SUETTINGER. It would have been around the time, probably very shortly before my response. Somewhere between July 21st and 24th.

Mr. ROHRBAUGH. And you made a response to this memo, then; is that right?

Mr. SUETTINGER. This memo was sent on to me through the system, as we call it in the National Security Council, and I responded to it, and I'm sorry, I had my date wrong, July 31st.

Mr. ROHRBAUGH. Let me show you exhibit No. 252. Can you tell me what that is?

[Exhibit 252 follows:]

~~CONFIDENTIAL~~

~~CONFIDENTIAL~~

NATIONAL SECURITY COUNCIL
WASHINGTON D.C 20506

UNCLASSIFIED

5727

July 31, 1995

INFORMATION

MEMORANDUM FOR ANTHONY LAKE

FROM: ROBERT L. SUETTINGER

SUBJECT: DNC Trustee Johnny Chung and the Harry Wu Case

This memorandum also covers a response to package #5908 -- request for a Presidential Credentials letter for Johnny Chung.

The memo from Leon Panetta's office (at Tab A) on DNC Trustee Johnny Chung's intent to try and get Harry Wu released is very troubling, in part because I was not able to contact the DNC in time to get them to discourage Chung from involving himself in this diplomatically difficult and high-stakes issue. Since he had already left for China before the memo was even transmitted, no remedial action was possible.

I spoke with Bobby Watson, Chief of Staff at the DNC, who indicated that they had sought to minimize the Presidential cachet in the letter and other materials the DNC provided him for his trip. All we can do is hope the Chinese recognize Chung's credentials are thin, and that his message should be treated with caution. No one in the Administration has any idea of what he plans to say on the subject of Harry Wu, and I doubt the President did more than shake his hand in a receiving line.

I believe Chung means well. But he is something of a self-appointed ambassador of goodwill between China and the U.S., and I believe he occasionally may overstate his credentials and the importance of his contacts to both sides.

In most cases, Chung is not in a position to make much of an impact on U.S.-China relations. In the Harry Wu case, however, he could conceivably do damage, depending on what he says and how much credibility he carries with Beijing. I recommend that we be very careful about the kinds of political favors he is granted. In the case of the request in Package #5908, the issue is moot, as he has already departed on his travel with a letter from the DNC.

Concurrences by: Alan Kreczko

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Mr. SUETTINGER. That is a memo that I wrote to Mr. Lake in response to the memorandum from Ms. Enright that was sent on to me.

Mr. ROHRBAUGH. What was your reaction about Mr. Chung attempting to negotiate the release of Harry Wu?

Mr. SUETTINGER. I was quite upset.

Mr. ROHRBAUGH. Why?

Mr. SUETTINGER. We had been engaged in a very quiet persistent and complex set of signals and negotiations with the Chinese Government trying to ensure that Mr. Wu was released as soon as possible, and it struck me that Mr. Chung might be capable of interfering in that process.

I had no idea of what message he thought he was delivering to the Chinese Government, and thought it could only confuse the matter; and I was worried that this process might be upset by the intrusion of somebody who had no knowledge and no responsibilities for what happened.

Mr. ROHRBAUGH. Were you concerned that Mr. Chung was not a professional diplomat?

Mr. SUETTINGER. It wasn't so much that he was a professional diplomat as that he seemed to believe that he had some sort of a mission, and it was a mission that I didn't believe that he had; and that I was concerned it would complicate what we were trying to do in our own appropriate channels.

Mr. ROHRBAUGH. Your memorandum is actually written, I believe at the very bottom it says, Mr. Chung had already left for Beijing at the time you had written your memorandum. Is that right?

Mr. SUETTINGER. That's correct.

Mr. ROHRBAUGH. If that's the case, why did you feel the need to write that memorandum?

Mr. SUETTINGER. One, it was sent to me for action and, generally speaking, when we were given an assignment for action we tried to respond, to answer the mail, if you will; and I also thought that I wanted to convey to Mr. Lake my concerns about this sort of thing because I certainly didn't want a repetition of it.

Mr. ROHRBAUGH. At the bottom you indicate that you had the concurrence of Alan Kreczko; is that right?

Mr. SUETTINGER. That's correct.

Mr. ROHRBAUGH. Who is Mr. Kreczko?

Mr. SUETTINGER. Mr. Kreczko was the Senior Director, Legal Assistant, to the National Security Council.

Mr. ROHRBAUGH. Why did you feel that you had to have the concurrence of Mr. Kreczko?

Mr. SUETTINGER. It involved an American citizen. Two American citizens.

Mr. ROHRBAUGH. Did you ever find out who Mr. Chung met while he was in Beijing or what he did?

Mr. SUETTINGER. I only read one newspaper account, and I don't know whether it was credible or not.

Mr. ROHRBAUGH. Mr. Chairman, I have no other questions. Thank you.

Mr. BURTON. I would like to use some of your time on the Republican side, if I might.

I want to make sure I understand this. This Mr. Zheng Hongye.

Mr. SUETTINGER. Zheng Hongye.

Mr. ROHRBAUGH. He was chairman of the China Council for the Promotion of International Trade, the CCPIT, an organization set up by the Chinese Communist Party to coordinate lucrative deals and funnel profits back into the party's leadership. Are you aware of who he was?

Mr. SUETTINGER. Your definition of that organization, sir, is not one that I had heard before. My understanding of the CCPIT is that it was an organization that was set up to promote international trade. It sponsored business delegations coming to the PRC and also Chinese delegations going overseas.

Mr. ROHRBAUGH. It was a part of the Communist Government.

Mr. SUETTINGER. That's correct.

Mr. BURTON. I think that says it. He was an adviser to the PRC State-owned China Ocean Shipping, COSCO, which wanted to lease the Long Beach Naval Shipyard.

Mr. SUETTINGER. I was not aware of that, sir.

Mr. BURTON. He was vice chairman of the Chinese People's Political Consultant Conference of the PRC's Communist Party for the Subcommittee for Taiwan, Hong Kong, Macao Compatriots and Overseas Chinese. Were you aware of that?

Mr. SUETTINGER. No, I was not.

Mr. BURTON. You were not aware of that either.

Mr. Jichun Huang, he was director and vice president of China International Trust and Investment Corp., CITIC. You knew that?

Mr. SUETTINGER. Yes, sir.

Mr. BURTON. And CITIC is the largest state-run business in the PRC with diversified holdings in banking, energy production and the United States real estate market, and the president is the alleged arms smuggler, as was mentioned before, Mr. Wang Jun. You are familiar with that?

Mr. SUETTINGER. I'm familiar with the fact Mr. Jun is the chairman of CITIC.

Mr. BURTON. And Mr. Renzhong Wang served as superintendent of the China Aviation Industry Ministry, part of the Chinese Communist Government, in Harbin. You are familiar with that?

Mr. SUETTINGER. Renzhong Wang is a rather common name, and there are a number of them who have been in different offices. I will take your word for it.

Mr. BURTON. That is what our information shows.

Mr. SUETTINGER. I will take your word for it.

Mr. BURTON. And of course Jianiong Yu oversees the activities of the COSCO shipping company, the Chinese shipping company.

The reason I bring all this up is these people have been alleged to have been part of a beer operation over there, but they had far-reaching responsibilities in China and ties to the Chinese party. They are coming in to meet the President. They meet with the President and he greets them warmly. And then after pictures are taken, he doesn't want the pictures to be given to them, and you didn't think the pictures should be given to them, I guess, as well.

Mr. SUETTINGER. My e-mail suggests that I didn't think there would be any lasting damage from providing the photographs to these individuals.

Mr. BURTON. I have no further questions.

Mr. Waxman.

Mr. WAXMAN. Thank you, Mr. Chairman.

Today's hearing is a continuation of a hearing we held yesterday, and both days are looking at a man by the name of Johnny Chung, who seemed to have an extraordinary amount of access to the White House and gave large amounts of money to the Democratic party.

Mr. Suettinger and Ms. Darby, you are here—oftentimes witnesses are invited to come and testify because we think maybe they did something wrong, but you are here to give us your professional judgment from the National Security Council about some matters that took place involving Mr. Chung.

And, Mr. Suettinger, you said in a memo that I think counsel has already referred to, that when you gave your impression of Mr. Chung you said, my impression is that he's a hustler and appears to be involved in setting up some kind of consulting operation.

Well, I think you are exactly right. Nothing we have learned or in the materials the committee has received indicates anything else. I don't believe this is a hearing about economic espionage or foreign agents or conspiracies to infiltrate our political system, or any of these more sensational charges that have been bandied about.

What it appears to me is that we have a man who was out to try to make a buck; he was a hustler. And the fact of the matter is, there are a lot of hustlers around, especially in this city. There is nothing illegal in being a hustler, even if we might not approve of it.

Now, the two of you are here to testify on one very narrow issue in particular, and that is the fact that Mr. Chung took a bunch of people in to listen to the President give a radio address to the country. And from the testimony yesterday, after that radio address, the President, after meeting these people, said that he felt something was inappropriate. And Ms. Hernreich told somebody, I guess Miss Darby, to find out whether they should release these photos to this man.

Mr. Suettinger, you were asked your opinion about that, and I gather you agreed that the photos could go to Mr. Chung and his colleagues; is that correct?

Mr. SUETTINGER. That's correct.

Mr. WAXMAN. Now, Mr. Suettinger, you are here because you are one of the leading experts on China. You made this your career. You speak Mandarin, you speak Cantonese; you are, I think fair to say, you serve as one of the NSC's top experts on east Asia. Is that an accurate statement?

Mr. SUETTINGER. It is not for me to say, sir.

Mr. WAXMAN. Don't be immodest.

In April 1995, you were asked by Brooke Darby to give your professional opinion as to whether the White House should release these photos to Johnny Chung. And you concluded in April 1995, quote, "I don't see any lasting damage to U.S. foreign policy from giving Johnny Chung these pictures." Is that right?

Mr. SUETTINGER. That's correct.

Mr. WAXMAN. In the second paragraph of your April 7, 1995 e-mail you did state some reservations about Mr. Chung, and you were concerned he was trying to use his White House contacts to enhance his business; is that correct?

Mr. SUETTINGER. That's correct.

Mr. WAXMAN. But your reservations had nothing to do with Mr. Chung trying to influence U.S. foreign policy; is that right?

Mr. SUETTINGER. That's correct.

Mr. WAXMAN. Was your e-mail intended to be a general directive to all White House staff to avoid contacts with Johnny Chung?

Mr. SUETTINGER. I'm not sure I'd go that far, sir. I just wanted to raise some concerns that had been brought to my attention that I thought others should know about what Mr. Chung might be up to.

Mr. WAXMAN. It was a simple response to a request for advice about the release of these photos?

Mr. SUETTINGER. That's correct.

Mr. WAXMAN. Now, was Brooke Darby's request for advice about the release of photos a matter of high importance to you as a member of the National Security Council?

Mr. SUETTINGER. No, it was not.

Mr. WAXMAN. Every day the NSC has to deal with the most sensitive and pressing national security matters facing this country. Isn't that a fair statement?

Mr. SUETTINGER. I believe that's fair, sir.

Mr. WAXMAN. So the release of photos is one of the least important questions you had to grapple with.

Mr. SUETTINGER. It was not one that I thought was of burning national interest.

Mr. WAXMAN. Based on your expertise, were the businessmen who accompanied Johnny Chung senior members of the Chinese Government?

Mr. SUETTINGER. They were senior members—yes, they were either senior members or former senior members. It's hard to draw a sharp distinction between what are essentially government-owned corporations and the Government itself. They have no governing authority, but they certainly have plenty of State backing.

Mr. WAXMAN. Can you give us your views as to the relative importance of these businessmen within China?

Mr. SUETTINGER. Relative importance in terms of what, sir?

Mr. WAXMAN. How important figures were they? We just had a visit from the President of China. He is obviously the most important.

Mr. SUETTINGER. Way below that.

Mr. WAXMAN. Pardon?

Mr. SUETTINGER. Far below that.

Mr. WAXMAN. Far below that. In July 1995, you drafted a memo concerning a request for Presidential credentials letter for Johnny Chung. He was interested in a letter from the President because he wanted to go to China to see if he could free jailed dissident Harry Wu; isn't that right?

Mr. SUETTINGER. That's correct.

Mr. WAXMAN. In your July 31, 1995 memo to Anthony Lake you referred to Mr. Chung and said, "No one in the administration has

any idea of what he plans to say on the subject of Harry Wu, and I doubt the President did more than shake his hand in a receiving line." Did that statement correctly reflect your views in July 1995?

Mr. SUETTINGER. That is correct.

Mr. WAXMAN. In other words, you had no reason to believe that the President ever encouraged Mr. Chung to go to China. In fact, you had no reason to believe the President was aware of anything about Mr. Chung.

Mr. SUETTINGER. I was—I had no reason to believe that at the time, no.

Mr. WAXMAN. Subsequent to July 1995, have you learned of anything that causes you to believe that the President encouraged Mr. Chung to go to China?

Mr. SUETTINGER. As I said, the only information that I have received about Mr. Chung's travel to China has been what has been published in the newspapers, and I have no way of assessing its credibility.

Mr. WAXMAN. You know Mr. Chung had a letter from DNC Chairman Don Fowler. Was this letter the kind of credentials letter that is provided to diplomats?

Mr. SUETTINGER. No.

Mr. WAXMAN. In fact, traditional diplomatic credentialed letters are provided by governments rather than political parties.

Mr. SUETTINGER. That is correct.

Mr. WAXMAN. And you yourself wrote to Mr. Lake and said that "Chung's credentials," meaning Chairman Fowler's letter, are "thin." What did you mean by that?

Mr. SUETTINGER. I thought that they would not be interpreted by the Chinese Government as representing the views of the President or the Government of the United States.

Mr. WAXMAN. Some Republicans have suggested that Johnny Chung, who is an American citizen, should somehow have been restrained by the administration from traveling to China on his own to pursue his own private efforts concerning Harry Wu. In your experience, does it sometimes happen that American citizens undertake their own private diplomatic efforts?

Mr. SUETTINGER. I would say there are probably examples of that; yes, sir.

Mr. WAXMAN. Well, you call them free-lancers.

Mr. SUETTINGER. Yes.

Mr. WAXMAN. There are a lot of free-lancers around who promote their view of what diplomacy ought to be, aren't there?

Mr. SUETTINGER. Yes, there are.

Mr. WAXMAN. In fact, in your interview, you called these kinds of individuals free-lancers because you're generally skeptical about the efforts of these free-lancers. They are not operating consistent with what U.S. Government policy might be.

Mr. SUETTINGER. That's correct.

Mr. WAXMAN. Now, free-lancers are not something unique to this one case. You have encountered free-lancers from the American business community. In fact, didn't Ross Perot once organize a rescue mission to free some of his employees from captivity in the Middle East? Wasn't that an example of free-lancing?

Mr. SUETTINGER. I would not want to characterize that, sir.

Mr. WAXMAN. OK. When people in the academic community go off on their own, are they free-lancers as well?

Mr. SUETTINGER. I think we need to draw a distinction between going out—I mean, everybody who travels to China is not a free-lancer. What I'm concerned about is when they're dealing with or trying to deal with an issue of particular national importance, such as the release of Mr. Wu. In those cases, I consider interference or efforts to be influential in that process to be free-lancing.

Mr. WAXMAN. It is the same as Amnesty International or Human Rights Watch or a Member of Congress acting on his own but not in sync with the American Government, going and doing what might be called free-lancing.

Mr. SUETTINGER. The difference between Mr. Chung's case and those is that Mr. Chung was going out representing himself as being on a mission that was connected to the White House, at least via the DNC, and I thought that was of considerable concern.

Mr. WAXMAN. I concede that point, and I think it is a valid one.

I am going to yield to Mr. Lantos to pursue further questions.

Mr. LANTOS. Thank you very much for yielding.

Well, today's episode of Trivial Pursuit deals with pathological preoccupation with photo opportunities. Now, I find these particular photo opportunities paling into insignificance when compared to the photo opportunities that the President of China just had during the course of his visit to the United States. As a matter of fact, prior to his visit, I publicly pointed out that having himself photographed at Williamsburg or at the Liberty Bell or at the White House or at Wall Street will do nothing to diminish our outrage at Human Rights violations in China.

And, of course, in terms of who has himself photographed with the top man in China, certainly there was a state dinner at the White House where everybody tried to get himself photographed with him. He visited here in the Congress, where the Speaker took him around. He had breakfast with several of us. And of course when he went to New York, the cream of the crop of the American business and financial community busted its gut to get into that dinner and to get themselves photographed with the top man in China. So, quite frankly, I sort of fail to get excited over the fact that a group of third-rate Chinese officials stood by while the President was reading a prepared 5-minute radio talk.

I do want to spend a minute on the Harry Wu case, because while I find the rest of this ludicrous, ludicrous beyond words, I mean it doesn't rise to the level of anything worthy of any serious discussion, Mr. Chung is a cheap and, unfortunately for him by this stage, an unsuccessful hustler, and he was collecting photographs all over the political landscape, from Presidential Candidate Dole to distinguished Republican Governors, Speaker Gingrich, the First Lady and whatnot, and putting them together in a brochure. And that is what he was selling. He was selling the illusion.

If I were to characterize him, I would call him an illusion merchant. He was selling an illusion that since Senator Dole happened to have his picture taken with him, somehow he had influence with Senator Dole or Newt Gingrich or the First Lady, which was about as absurd a suggestion as anything that could be made.

But the Harry Wu thing annoys me, and I tell you why it annoys me. Harry Wu is one of the heroes of our age. He has given many, many years of his life because of his commitment to democracy and freedom. In his attempt to demonstrate the slave labor system in China, he spent many years of his life in the most miserable Chinese prison conditions. And the very best people in this Congress, on both sides of the aisle, in both the House and the Senate, and many people in the private sector have busted their guts for years to get Harry Wu out. And the notion that Johnny Chung, this quintessentially cheap self-promoter, played the slightest role in the liberation of Harry Wu is a notion that I find repugnant and obnoxious. This is the notion of the rooster who claims that the sun rises because he crows. This does not even rise to the level of absurdity. It is beyond absurdity.

But, since we need to go on with today's episode of Trivial Pursuit, I would like to place into the record, Mr. Chairman, the article of October 30 from the Washington Post entitled "Business Mixes With Pleasure at the White House Dinner, China's Jiang Gets a Taste of Corporate America," which describes in detail how diners of our major multinational corporations were anxious to have their pictures taken with the President of China, who I think is a more significant figure than the small entourage that got into the radio studio.

I thank the gentleman for yielding.

Mr. BURTON. Without objection.

Mr. WAXMAN. I yield to Mrs. Maloney, the next senior member, for questioning.

Mrs. MALONEY. Thank you for yielding to me.

I would like to ask Mr. Suettinger, earlier we were talking about the gentlemen that were with Mr. Chung, and many of them were associated, you said, with the Chinese Government, but it is a Communist country, and the Communist country owns all if not or most of the businesses there. And are most of the people in business in China associated with the Chinese Government? Is that a fair statement, would you say?

Mr. SUETTINGER. I don't think so.

Mrs. MALONEY. So there are a lot of private businesses?

Mr. SUETTINGER. There is a growing amount of private enterprise in China; that is correct.

Mrs. MALONEY. I would like to ask both of you the same question, first Ms. Darby and then Mr. Suettinger.

Do you have any reason to believe that Johnny Chung was an agent of the Chinese Government, Ms. Darby?

Ms. DARBY. No, I do not.

Mrs. MALONEY. Mr. Suettinger.

Mr. SUETTINGER. I do not.

Mrs. MALONEY. Do you believe that he tried to seek any favors for China, Ms. Darby?

Ms. DARBY. I really have no basis for knowing. I have no idea.

Mr. SUETTINGER. Not having been present at any of Mr. Chung's meetings, I can't answer the question.

Mrs. MALONEY. Do you believe that it was unusual for Johnny Chung to seek to have his picture taken with the President, the First Lady or other members of the administration? And do you be-

lieve that Johnny Chung was unique in seeking to obtain those photographs?

Ms. DARBY. From what I understand in press accounts recently, it doesn't sound like this was an unusual situation.

Mr. SUETTINGER. Again, I have no basis on which to make a judgment on that.

Mrs. MALONEY. Do you think it is unusual for a businessman to display a photograph of himself with the President, the First Lady or Members of Congress or leaders in the administration?

Ms. DARBY. No, I do not think it's unusual.

Mr. SUETTINGER. I would think not.

Mrs. MALONEY. Is there anything illegal or unethical in seeking to obtain such a picture or to display it?

Ms. DARBY. I don't believe so.

Mr. SUETTINGER. Not to my knowledge.

Mrs. MALONEY. Do you believe that the White House typically asked for guidance with respect to people granted access to the President?

Ms. DARBY. They sought access on some—they sought our opinion on some occasions, whenever they had a concern.

Mr. SUETTINGER. I would have to defer to Ms. Darby on that.

Mrs. MALONEY. Do you think that it was common for people to gain access to the President without being screened by the National Security Council?

Ms. DARBY. That I really wouldn't know. I'm sure there are many people who are not screened by the National Security Council, but in terms of foreign nationals or others, I really wouldn't know.

Mr. SUETTINGER. Nor do I.

Mrs. MALONEY. And what do you think the White House should do to make the vetting process more effective? Do you have any ideas in that direction?

Ms. DARBY. I understand that Sandy Berger, the current National Security Adviser, has instituted some new vetting policies. I'm not sure what those are. I believe it's to make more routine inquiries into people who are coming in to see the President, who have a foreign connection of some kind.

Mrs. MALONEY. Could you forward those recommendations to the committee so we could look at them or get them for us?

Ms. DARBY. I believe they are recommendations that have already been made by Sandy Berger, so.

Mrs. MALONEY. So they have already been made. I would just like to see them, that's all. I guess we can get them from him.

Ms. DARBY. Yes. I don't work for the National Security Council any longer.

Mr. SUETTINGER. Nor do I.

Mrs. MALONEY. Do you have any ideas of how we should improve their vetting process or do you think it needs to be improved? I am talking to Mr. Suettinger.

Mr. SUETTINGER. Oh, I'm sorry. I would have no recommendations on that score.

Mrs. MALONEY. You have no recommendations.

I would like to ask Ms. Darby, when you worked at the National Security Council, could you describe your duties and exactly what you did there?

Ms. DARBY. Sure. I handled Nancy Soderberg's schedule, at least part of the time; would make sure that she had briefing papers for her meetings. I generally did not prepare those. Those were prepared by the professional staff members with the policy expertise. I was not a policy adviser of any kind. I would prioritize paperwork for her. I would help screen requests from the staff who wanted her advice on something and prioritize things for her.

I was also occasionally a liaison between other parts of the White House with Nancy Soderberg and members of the National Security Council staff, based primarily on the connections I had made on my days on the campaign and on the transition.

Mrs. MALONEY. Did you serve as a contact person for White House staff who needed to direct requests for guidance to the National Security Council?

Ms. DARBY. Sometimes. It was not an official responsibility that I would say I had. But, more informally, I think that I often became a conduit for those kinds of requests.

Mrs. MALONEY. And when you received those requests, how did you handle them?

Ms. DARBY. I would staff them out to the relevant policy office. In the National Security Council there are both regional offices that handle, obviously, regions, and functional offices that handle things like defense issues, nonproliferation issues. And on the basis of the request that I received, I would make a determination about which office needed to handle that request and I would farm the request out to that relevant office.

Mrs. MALONEY. How often did the President's office ask for guidance from the National Security Council with respect to a visitor or a letter?

Ms. DARBY. I really don't recall any specific—it is hard to put a number on it. If I had to guess, I would say maybe four to eight times a month.

Mrs. MALONEY. Did you usually receive a request for guidance before the event?

Ms. DARBY. Yes. We generally did. I mean that was the purpose of us providing guidance. Providing guidance after the fact isn't exceedingly helpful, so.

Mrs. MALONEY. And under what circumstance would a request for guidance typically be made?

Ms. DARBY. It's hard to say. I mean, for someone with a foreign tie, who wanted to come in and see the President, and it came through another office in the White House and they just wanted to check with us to make sure that there was nothing about the person's background that would lead us to have any concerns about the President meeting with somebody, or other senior people within the White House.

Mrs. MALONEY. Mr. Suettinger saw no lasting damage to U.S. foreign policy from giving Johnny Chung the photos. Why did you consider that a negative recommendation?

Ms. DARBY. I think his using the term hustler; the fact that this person was probably going to exploit the photographs for his own personal business interests. Again, it was really my own personal recommendation to Kelly Crawford that if I were in her situation,

I wouldn't want this person continually harassing me for photographs of himself with the President.

So better to err on the side of caution from my own personal benefit, if I were Kelly Crawford.

Mrs. MALONEY. In your own experience, was a request for guidance about the release of a Presidential photograph one of the most important matters confronting the National Security Council in April 1995?

Ms. DARBY. No, it certainly was not, and I didn't independently recall this incident at all until I saw the text of my e-mail published in the New York Times.

Mrs. MALONEY. Well, getting back to your e-mail, you wrote in your e-mail message that these people, referring to Johnny Chung and his group, were major DNC contributors; is that correct?

Ms. DARBY. That's what I wrote, yes.

Mrs. MALONEY. How did you know that? Did you have actual knowledge that this fact was correct?

Ms. DARBY. No, I did not. I have no idea who contributes to the DNC. And I believe the only way I would have known this was if Kelly Crawford conveyed it to me. If not in those specific terms in more general terms that I took to mean that they were DNC contributors.

Mrs. MALONEY. Because of—so, in other words, she conveyed that information?

Ms. DARBY. I presume so. I don't have an independent recollection, but the fact it is in the e-mail and I would have no other way of knowing they were contributors or not.

Mr. WAXMAN. Mrs. Maloney, I wonder if I could yield to Mr. Fattah in the time that we have allotted on this 5-minute round.

But in doing so, I just want to make a comment so that no one misunderstands. There are a lot of people who use photos for their own promotional activities. Lobbyists do it all the time. The reason people go to political fund-raisers is often just so they can get a picture of the President, Senator Dole, Newt Gingrich, and then they hustle it to see how far they can go with it just to promote themselves.

Mr. Fattah.

Mr. FATTAH. Thank you very much. Let me welcome you both here today. It is interesting, as times change, I guess Ms. Darby, you, unfortunately, have been consorting with known Democratic sympathizers. The Congress at another point in its history was interested in those who were sympathetic to the causes of another political party.

And I want to focus in on this, the Communist Government of China, because it is of interest to me, given the context of our relationship since President Nixon opened up our relationships with this country, there have been a succession of Presidents who have moved, continued to move in that direction. And of interest is this discussion about this supposed arms dealer, Wang Jun.

Mr. SUETTINGER. Wang Jun.

Mr. FATTAH. Of this CITIC.

Mr. SUETTINGER. CITIC.

Mr. FATTAH. I want to enter into the record, Mr. Chairman, a number of newspaper articles which I am going to refer to; one

from the Chicago Tribune, another from the Portland Oregonian, and they outline, first of all, that George Bush had dinner with this gentleman who we are now wanting to raise a lot of concerns about him having a picture taken with President Clinton.

In fact, he says that Henry Kissinger is a good friend of his. There are a number of important political figures in our country who are on the advisory council for this corporation, like former Secretary of State George Shultz, former Secretary of State Alexander Hague. There are a number of other people who have close ties to the Republican party, like a gentleman by the name of Mr. Greenberg, who is the head of AIG, who is a well-known and very substantial contributor to the Republican party, who is also on the board.

And I want to enter these into the record, because first and foremost there was never a meeting—let me ask for permission they be entered into the record.

Mr. BURTON. Without objection.

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Sunday, March 16, 1997

WIRE STORIES

CHINESE EXECUTIVE EXPLAINS VISIT
STEVEN MUFSON - LA Times - Washington Post Service

Summary: Wang Jun says finances and the Lehman Brothers investment bank brought him to the White House

A Chinese business executive who attended a controversial White House coffee for political contributors President Clinton was host of last year said his visit was arranged by the New York-based investment bank Lehman Brothers Inc.

In an interview with The Washington Post, Wang Jun said the main purpose of his U.S. visit was not an effort by the Chinese government to win influence in the United States.

Wang Jun heads China's most politically connected financial and industrial conglomerate, as well as a Chinese military-owned arms trading company being investigated for illegally smuggling assault rifles into the United States.

Rather, Wang said, Lehman Brothers was competing with other U.S. firms to do business with China and invited him to the United States. He was interested in exploring how receptive U.S. financial markets would be to new debt offerings by Chinese companies and government agencies, he said.

"I didn't propose this meeting," Wang said of his Feb. 6, 1996, White House visit. "I said again and again that Clinton was too busy. I had little to talk to him about."

- New insight

Wang's account offers new insight into how he came to be invited to a White House coffee for political fund-raisers. Initial reports of Wang's attendance focused on his chairmanship of a company called Poly Group -- the firm under scrutiny for the alleged illegal arms dealing. Clinton then called the meeting

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clearly inappropriate.

But by Wang's account, his stop at the White House had nothing to do with Poly Group. Instead, he said, it was a brief and unplanned interlude during a U.S. tour with an entirely capitalist purpose: to talk high finance with Wall Street firms on behalf of the mammoth conglomerate he heads, the China International Trust and Investment Corp.

The Democratic National Committee has said previously that Wang's visit was arranged by Charles Yah Lin Trie, a former Little Rock restaurateur and longtime friend of Clinton's. He is one of the principals being scrutinized in a Justice Department investigation into questionable campaign contributions during the 1996 presidential election.

The Justice Department has developed evidence that China tried to direct nearly $2 million in illegal campaign contributions to members of Congress and Clinton administration officials, government officials said.

Chinese Premier Li Peng, in a news conference Friday in Beijing, flatly denied that China has sought to influence U.S. elections or funnel money to presidential or congressional candidates.

Wang also denied suggestions that he or his company has been involved in trying to influence U.S. politics or U.S. policy through illegal campaign contributions.

- Influence not sought

A spokesman for Lehman Brothers confirmed that executives of the firm had met with Wang during his visit to the United States last year but said the firm had played no role in arranging the White House visit with Clinton. During the U.S. trip, Wang's main contact at Lehman was Ernest G. Green, a managing director of its Washington office. Wang submitted a letter from Green when he applied for his U.S. visa, and Green contacted Lehman's New York headquarters to arrange meetings there for Wang.

The day after Wang's visit, Green contributed $50,000 to the Democratic National Committee. Green has called the timing of the donation a coincidence and said the contribution came from his personal funds. His wife, Phyllis, signed the check.

Green is a big Democratic Party fund-raiser and longtime friend of Clinton's and Trie's who has given differing accounts of his

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relationship with Wang. The FBI has interviewed Green as part of the Justice Department investigation.

Wang's account suggests a new wrinkle in the controversy about the use of the White House for fund-raising activities. Although the Justice Department inquiry is focused on alleged attempts by China to win influence improperly with U.S. politicians, Wang's version appears to show an attempt by an influential fund-raiser and Clinton friend to use his White House access on behalf of a potential business associate who could help his firm earn large sums of money.

- Underwriting was the goal

Lehman Brothers is competing against other U.S. investment banks for new chunks of the underwriting business in China for debt and equity securities. This year, the Chinese government has decided to allow about 40 Chinese companies to sell shares in Hong Kong or New York. Several large bond issues are expected as well.

Green did not return a telephone call Friday, but in an interview in January he denied that he had anything to do with arranging Wang's White House visit.

In an interview last week in Beijing, Wang, 55, said he has had a long association with Lehman Brothers.

"Lehman Brothers has always been an important partner for CITIC," Wang said. "They are working hard to become the lead underwriter for Chinese debt in the United States. Every time I visit the United States, I meet with Lehman Brothers."

Wang called the flap about his White House visit a misunderstanding. "I have a long-standing belief that no matter who becomes the U.S. president, when faced with a country as big as China, he will maintain good relations even if it isn't consistent with his campaign slogans," Wang said. Therefore, funneling money to either political party in the United States was unnecessary, he suggested.

What has created the most questions about his February 1996 visit to the United States has less to do with his role as chairman of the financial conglomerate CITIC and more to do with his chairmanship of the Poly Group, which was set up to act as the nation's arms trading company more than a decade ago.

- Investigation target

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Poly has been the target of an investigation in San Francisco into the smuggling of Chinese-made AK-47s and semi-automatic weapons into the United States. The import of those weapons into the United States was made illegal by a measure President Clinton signed.

"All the charges against Poly have no basis at all," Wang said. Wang blamed the smuggling operation on two former Poly employees who were let go long before the smuggling incident. Wang said the pair used the name of a Poly company that was supposed to be defunct.

Wang said Poly in China was trying to cooperate with law enforcement officials by providing information. He said it was his understanding that a Chinese government investigation had led to the arrest of one person in Beijing.

As the chairman of CITIC, Wang reports directly to China's State Council. Founded at the dawn of the late Deng Xiaoping's economic reform era as the government's window onto the capitalist world, CITIC was assigned the task of wooing foreign investors and guiding them through China's centrally planned economy.

Since then, CITIC has become a mammoth conglomerate, with tentacles in virtually every type of business. It owns one of China's largest banks and has substantial minority stakes in myriad Chinese ventures: satellites, bridges, tunnels, accounting firms, law firms, pharmaceutical makers, department stores, automobile plants, and textile and chemical manufacturers.

"I've been to many countries and met with many heads of state, none of which was requested by me," Wang said. And he is on the list of many retired politicians who visit China: He has received President Bush and former secretaries of state Henry Kissinger and Alexander Haig. He calls Kissinger a good friend.

"As for me, I don't even get much involved in politics in China, let alone in the United States," Wang said.

During a U.N. conference on women's rights in 1995 in Beijing, Wang said, he received an invitation from Hillary Rodham Clinton to attend a reception, but his schedule was fully booked.

During his two-day visit last year to Washington, Wang also met with Commerce Secretary Ronald H. Brown, whom he had met once before in Hong Kong. Wang said they discussed CITIC's relationship with the United States.

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- CITIC helped with exports

Through sales to ventures that CITIC partially owned, many U.S. manufacturers had exported products; Wang said one of those sales was the first of a U.S. product to China made with Export-Import Bank financing. "CITIC itself needs to buy a lot and also assists other companies to buy a lot of equipment in the United States," Wang said.

Wang said he never sought out a meeting with Clinton, who he said was busy with budget negotiations, talks with state governors and a visit from a foreign head of state. Wang said that in addition to Lehman Brothers, he thought that Trie played a role in arranging the meeting.

Wang said he obtained Trie's name from Ng Lap Seng, a Macao businessman who is in property development ventures with CITIC and who is also a business partner with Trie.

Democratic National Committee spokeswoman Amy Weiss Tobe said Friday that it was Trie who asked whether Wang could attend the coffee.

. the time for the meeting slipped from morning to afternoon, Wang suggested abandoning the idea, he said. Finally it was set for 6 p.m.; Wang delayed his flight to New York.

"They said I was to meet Clinton. I couldn't say no. There wasn't much to talk about. Just a brief handshake with Clinton," Wang said. Trie accompanied Wang to the meeting. Clinton asserted that the U.S. relationship with China might be the most important one for the United States. Wang, who speaks little English, agreed.

The gathering itself was dominated by a general discussion of international finance. No one interviewed recalls Trie or Wang entering the discussion.

---- INDEX REFERENCES ----

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NEWS

CHINESE OFFICIAL NO STRANGER TO VIPS FUNDRAISING PROBE'S KEY FIGURE CULTIVATED U.S. ESTABLISHMENT

David Jackson, Washington Bureau.

Wang Jun, a central figure in one of the most troubling episodes in the Democratic campaign finance controversy, is usually described as a shadowy gunrunner who slipped virtually unnoticed into a White House coffee reception with President Clinton.

Yet the man who sipped coffee with Clinton as federal agents investigated one of his companies for allegedly smuggling 2,000 inese semiautomatic rifles into the United States is far more ...an an interloper who embarrassed an unwitting administration.

Wang is chairman of the China International Trust & Investment Corp., or Citic, a $20 billion conglomerate that serves as chief investment arm of China's government and holds ministry-level status on the Chinese State Council. His business and personal interests quietly have entwined with those of some of America's most prominent commercial and political figures.

For example, in transactions spearheaded by Clinton administration officials, Wang's government-controlled companies have received more than $200 million worth of financing from the U.S. Export-Import Bank, the federal agency created to back American overseas ventures.

Citic is guided by the 13-member Citic International Advisory Council, which includes American executives such as former U.S. Secretary of State George Shultz and New York insurance magnate Maurice R. Greenberg, staunch Republicans who represent firms with substantial business interests in China.

Similarly, Citic has forged partnerships with U.S. commercial titans including Westinghouse Electric Corp., Bechtel Enterprises Inc. and Chase Manhattan Corp.

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The Chinese conglomerate's amazing growth has been fostered in part by U.S. trade and diplomatic officials. During 1996, for example, the U.S. consulate in Hong Kong sent 216 cables encouraging American executives to contact Citic as a potential partner in multibillion dollar Chinese infrastructure projects.

Wang's aggressive networking on behalf of Citic has made him a central figure in the Justice Department's campaign finance investigation. Officials are seeking to determine if Wang's contacts played any role in what may be a multifaceted Chinese espionage campaign.

FBI Director Louis Freeh told a Senate committee last week that the issue of Chinese espionage "is really the heart of" the campaign finance investigation.

As federal agents investigate suspect activities of Wang's Citic conglomerate, a subtler story of Wang's foray into American politics can be discerned through his careful cultivation of Washington's political establishment.

In April 1996, two months after his White House visit, Wang s host at a Beijing dinner that included former President George Bush and National Security Adviser Brent Scowcroft.

Wang "seemed to be an affable person," recalled Scowcroft, who travels to China once or twice a year and advises American companies doing business there.

"My recollection is he (Wang) did not" speak English, Scowcroft added. "Now that doesn't mean he doesn't, because a lot of them speak English and don't want to do it in front of foreigners."

Bush, who has made several visits to China since leaving office in 1992, said through a spokesman that he had no recollection of Wang Jun and no business relationship with Citic or any other Chinese company.

Bush spoke at the dinner in the Chinese capital to express his belief that the U.S.-China relationship is the single most important bilateral relationship in the post-Cold War era, his spokesman Jim McGrath said.

As Wang nurtured ties with prominent conservative business leaders, he gained access to the Clinton administration by using ck-channel contacts, mainly Democratic fundraisers who since then have been accused of improperly funneling contributions to the

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party.

Wang was brought to the White House coffee reception by Yah Lin "Charlie" Trie, a Little Rock restaurateur and friend of Clinton who used photos taken during his at least 38 White House visits to impress potential clients of an Asian trading firm he was launching.

Trie solicited $645,000 in Democratic Party donations that have been returned because of questions about the money's origins and an additional $600,000 that has been returned by the Clintons' Whitewater legal defense fund.

Another Citic executive, Vice President Jichun Huang, was brought to the White House in March 1995 by California computer developer Johnny Chien Chuen Chung, who gave $391,000 that has been returned by the Democratic Party.

Federal government wiretaps indicate that Chinese Embassy officials planned as early as 1995 to funnel contributions to political parties as a way of gathering intelligence on--and possibly gaining influence over--White House and congressional policymakers. Federal agents warned seven lawmakers to beware of Chinese campaign donations that might be passed through intermediaries.

U.S. law enforcement and intelligence officials involved in the investigation said China's espionage and lobbying operations focused on two broad goals: acquiring militarily sensitive U.S. technology for reproduction in China's state-run factories and dismantling the trade restrictions imposed by Washington as punishment for China's human rights abuses.

If those were China's aims, the country's leaders found ready allies in Republican and conservative business leaders who were fighting to open doors to China's emerging markets.

The fruits of Wang's labors were evident in an August 1994 ceremony at China's Great Hall of the People, when then-Commerce Secretary Ron Brown presided over the signing of a contract between Westinghouse Electric and a Chinese company controlled by Citic.

The Citic-controlled company was buying two Westinghouse generators for a coal-fired electrical plant on the Yangtze River about 150 miles west of Shanghai.

To finance the purchase, the U.S. Export-Import Bank lent $29 million to the Jiangsu Ligang Electric Power Co. Ltd., a firm

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controlled by Citic through complex links with subsidiaries and holding companies, records filed with the bank show.

Some 26 percent of the shares of Jiangsu Ligang were owned by a firm called Sunburst Energy Development Co., which is in turn wholly owned by Citic. Another 56 percent of shares were held by a subsidiary of Citic's Hong Kong-listed investment vehicle, Citic Pacific.

The U.S. government loan, made at a low 5.95 percent interest, was an obvious coup for the Citic-controlled power company. U.S. trade officials pushed the deal because the machinery contract created jobs at Westinghouse's North Carolina factories. At the signing ceremony, Brown called the outcome "a partnership in peace, in power, and in a future that is bright with the prospects of cooperation and commitment."

In a smaller but similar deal, the bank in August 1993 had guaranteed a $72.5 million loan from a commercial bank to a Hong Kong telecommunications firm controlled by Citic, enabling that company to purchase a commercial satellite from a division of Martin Marietta.

Citic was a co-guarantor of the bank loan to Asia Satellite Telecom Co. Ltd., or AsiaSat, in which Citic had a controlling interest. Founded in 1988, AsiaSat has forged deals with several American companies, including a March 1996 agreement with Hughes Space and Communications International of Los Angeles to build its third satellite, the AsiaSat 3, with a $220 million loan from a consortium of banks.

Members of Citic's International Advisory Council, who help guide the company's global commercial ventures, would offer few details of their involvement with the Chinese government-controlled conglomerate.

Shultz said of the council's last gathering in Beijing in March 1996, for example, that it was "a rather interesting meeting, and I have another coming up, so that's about all there is to say about the advisory council."

At the meeting, Shultz said, Citic's executives divulged few particulars of the conglomerate's operations.

"They presented some information in broad strokes. You're talking about Citic in China now. That's not a publicly traded corporation," Shultz said.

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Now a director of Bechtel Group Inc., the world's largest engineering, power and defense construction company, and a director of its subsidiary Bechtel Enterprises Inc., Shultz has given more than $110,000 to Republican candidates since 1991.

Shultz said he pays his own expenses when attending Citic meetings and has no "financial connection" to the Chinese conglomerate.

"I just felt that since the Citic is basically a state-owned corporation that being an official member would not be appropriate for me," he said.

While Shultz said he has no personal financial ties to Citic, Bechtel Enterprises and Citic in 1994 established a joint venture to transform the 31-square-kilometer Daxie Island into a major deep-water port that will serve central China.

A $2.2 million cross-sea floating bridge to the island already has been opened for traffic, and more than a dozen transnational companies have invested $64.5 million to open plants and offices on the island where 20,000 fishers and farmers had formerly lived, according to government-controlled Chinese news reports.

Shultz said the Daxie Island venture was "entirely separate" from his role on Citic's advisory board.

"Bechtel has had this little joint venture with Citic for some time," Shultz said.

Advisory council member Maurice R. "Hank" Greenberg, chairman of the $28 billion, multinational insurance underwriter American International Group Inc., or AIG, declined through a spokesman to discuss his involvement with Citic.

With a personal worth estimated at $800 million, Greenberg has given more than $120,000 to Republican politicians since 1991, federal election records show, and donated hundreds of thousands of dollars more to conservative charities like Robert J. Dole's Better America Foundation, to which he gave $100,000.

After Greenberg lobbied Chinese officials during 36 trips, AIG in 1992 became the first foreign company allowed to set up shop to sell life insurance there; by 1995 the company's 5,400 Chinese salespeople were writing some 55,000 new policies a month, according to industry reports.

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Greenberg, who has lobbied U.S. officials on Chinese economic and trade issues, in 1994 established a $1.1 billion Asian Infrastructure Fund to encourage overseas investments into the Pacific Rim's highways, airports and power plants. Citic officers sit as advisers to that fund.

Citic advisory council member Brian Mulroney, the former Canadian prime minister and leader of the conservative Tory political party, is now a private attorney with extensive international business ties.

Mulroney sits on the advisory board of Bombardier Inc. Aerospace Group, an aircraft manufacturer that has through subsidiaries sold planes to China since 1977. In January, Bombardier agreed to sell China five corporate jets, worth $116 million, by signing a contract with Wang's Poly Technologies, the company whose U.S. president was indicted for smuggling the AK-47s.

Mulroney said through an assistant that he does not grant interviews.

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PHOTO GRAPHIC; Caption: PHOTO: Former National Security Adviser Brent Scowcroft attended a 1996 dinner held by Wang Jun. GRAPHIC: Citic's U.S. businesses. - What it owns. - Ka Wah Bank Ltd. - Citifor Inc. - CitiSteel USA Inc. Chicago Tribune. See microfilm for complete graphic.

---- INDEX REFERENCES ----

COMPANY (TICKER):	WESTINGHOUSE ELECTRIC CORP.; BOMBARDIER INC.; BOMBARDIER INC. (WX BBD.A BBD.B)
KEY WORDS:	FEDERAL; GOVERNMENT; PROBE; CHINA; CAMPAIGN; FINANCE; BUSINESS
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GOVERNMENT:	Federal Government (FDL)
REGION:	China; Pacific Rim; Far East (CH PRM FE)

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Mr. FATTAH. Thank you. First and foremost, contrary to all of these statements that the President had a meeting with these people, there is nothing anywhere in the record to suggest that there was a meeting. They were in the audience when there was a radio address. They got a picture taken and they left.

The President then said to his closest aide that he had some concerns about the appropriateness of their visit, which, therefore, got the two of you involved in an after-the-fact request as to whether or not the picture should be released.

But I do want to note, since there seems to be such an interest in our interrelationships between the People's Republic and particularly these group of businesspeople, that if the committee is interested, maybe there are some other people who we could call in and ask, because they seem to have a lot of knowledge about how this corporation functions and particularly this gentleman.

This is not something we dug up anywhere. These are articles that appeared and are available. I know the committee has a large staff, so I am sure that the majority has knowledge of these contacts, even as it attempts to infer some inappropriate behavior on behalf of the President, when everything suggests to the contrary, as based on this record, that this gentleman did nothing more than get his picture taken. But he is someone who has had extensive contacts and business relationships with major leaders in the majority's party.

So I think that we would want to have a chance—he also had, at this dinner, the former National Security Adviser; Brent Scowcroft was also present, as reported in this Chicago Tribune article that was dated March 23, 1997.

The other article from the Portland newspaper is dated March 16. I want to ask you, because you are, to the best of my knowledge, the first person that has appeared before us who really has any knowledge about China to answer some questions about this Nation's relationship, even though we continue to talk about the government as if it is a government that we have no ongoing relationship with.

Isn't it true that for the last few decades we have had the policy—the foreign policy of our Nation has been to reach out and to be involved in constructive engagement with the People's Republic of China?

Mr. SUETTINGER. That is correct.

Mr. FATTAH. And isn't it true that we allow free travel between citizens of our country, particularly American businessmen who, by the thousands, go to China, seeking and, in many cases, winning business over there?

Mr. SUETTINGER. That also is correct.

Mr. FATTAH. Because when the President of China came here and he came to my district. He signed a contract with Boeing for a few billion dollars. I didn't notice anybody in the majority party jumping up and down about this relationship with the Communist Government of China. They were clapping and being pleased that there was going to be this business deal with the Boeing Corp.

So the inference that is being drawn here, that any association, anything having to do with the People's Republic of China having to do with the Clinton White House is somehow inappropriate, isn't

that contrary to everything that has been done since President Nixon went to China and President Ford continued that relationship and President Carter, President Reagan and President Bush? Didn't we continue to encourage, at almost every level, interactions with the People's Republic of China, their Government, their citizens and their various institutions?

Mr. SUETTINGER. The policy of engagement with China has been consistent over the last several administrations, sir.

Mr. FATTAH. Can you help me then understand, even as the Congress voted to continue most-favored-nation status, and it is clear that these persons who were here and who got their picture taken with the President—and as you have indicated, you don't have any reason to believe that the person who arranged this, Johnny Chung, was an agent of the Government in any way, is it the practice of the People's Republic of China, based on all of your studies and knowledge, that they would attempt to, as part of their activities, interfere in the internal political workings of the United States?

Mr. SUETTINGER. I don't really think I am in any way able to answer that question in the way that you would like it to be answered.

Mr. FATTAH. Just answer it truthfully. That is fine with me.

Mr. SUETTINGER. I am trying to be truthful, sir. It calls for a judgment that involves information that is classified. It calls for a judgment that requires study way beyond what I can do.

Mr. WAXMAN. If the gentleman will yield, there were press reports that there might have been Chinese intelligence people or Government officials of some sort trying to look at how to influence Congress. There was never any report, that I saw in the press, that said they were trying to do something to influence the Presidential elections.

Mr. FATTAH. That is correct. But we won't press in relationship to any classified information. Let's just deal with what is obvious.

Johnny Chung has been accused of essentially trying to use his relationship with important, powerful political figures to make money. Do you think that there may be a few other thousand people who come into this city who have relationships with political figures who, from time to time, are then known to try to make a buck?

Mr. SUETTINGER. I have to defer to others' judgment on that, sir.

Mr. FATTAH. I want to thank you for your testimony. I thank the ranking member for yielding.

Mr. BURTON. The gentleman's time has expired.

Mr. Barr.

Mr. BARR. During the time period that we are talking about here, that is, during 1995, what security clearances did each of you possess?

Ms. DARBY. I had a Top Secret SCI clearance.

Mr. BARR. That means Top Secret Codeword?

Ms. DARBY. Yes.

Mr. BARR. Mr. Suettinger.

Mr. SUETTINGER. I have full clearances, sir.

Mr. BARR. Top Secret Codeword?

Mr. SUETTINGER. Yes.

Mr. BARR. And that entitles you to see a fairly wide range of classified materials maintained by our Government?

Mr. SUETTINGER. That is correct.

Ms. DARBY. Yes.

Mr. BARR. Mr. Suettinger, would you please enumerate for me the number of countries in the world whose national security concerns and whose economic, political, diplomatic and military interests coincide 100 percent with those of the United States at all times?

Mr. SUETTINGER. Zero.

Mr. BARR. Could you please enumerate for me the number of countries in the world that would have absolutely no interest whatsoever at any time in making policies of this country more favorable toward theirs?

Mr. SUETTINGER. I am not sure I understand your use of the term making them "more favorable."

Mr. BARR. You can interpret it any way you like. What I am trying—my point is, and I would presume you—and tell me if you don't. My point is, and I presume you would agree with me, that at some point in time every country with which we deal, or virtually every other country in the world, at some point in time has policy matters and interests that may differ from ours and for which they would like to see our policies change and become more favorable to what they would like to see and to coincide with their interests. Would that be fair to say?

Mr. SUETTINGER. Yes, sir.

Mr. BARR. It is essentially the nature of politics, Hans Morgenthau wrote about it two generations ago, and it is the nature of national sovereignty.

In exhibit 198, if we could have that up again, please, you posed the question, "Who am I to complain?" I think you are a very appropriate person to complain, to be very honest with you. You have a very substantial background and understanding of foreign relations. You have access to very important classified information of our Government that bears on the highest levels of international security. You have people, such as Ms. Brooke, who turn to you for guidance; and I think you have a very clear responsibility to the President, whoever that President is. And I know from your background also that your interest in national security and in providing the unvarnished information and advice to the administration, the President, is not motivated by political concerns for one party or another; is that correct?

Mr. SUETTINGER. That is correct.

Mr. BARR. Therefore, I think that the answer to your question posed in that e-mail, "Who am I to complain?", I think you are a very appropriate person to have complained.

It isn't so much that the other side indicates that all sorts of people want to have their picture taken with the President. We all know that. I apologize for your having to sit there and hear them endlessly go on and on about that. We also know that there are all sorts of people who try and get access to the President, and a number of those succeed. That is not the point here either.

My concern right at the moment does not really have anything to do with Mr. Johnny Chung either. It has to do with what seems

to be a complete lack of process and lack of safeguards in protecting the President. And I may disagree with this President rather strenuously in a lot of areas, but I do think, as the leader of this country, he needs to be protected. He needs to have people like you complaining when it is appropriate.

We have people who had gotten in to see the President, apparently without any background check whatsoever. Apparently. From Ms. Brooke's testimony earlier, we may provide a slightly—we may provide a higher level of protection for people improperly getting in to the President for our citizens and foreign citizens, which strikes me as very, very odd.

My point is, you say that who are you to concern, and then you go on to say, they seem to be bona fide Chinese officials. How were you able to reach that conclusion? It is my understanding that no checks were made on these people.

Mr. SUETTINGER. Well, let me say two things.

One, I had at my—in my office a handbook, unclassified handbook of Chinese officials. I found some but not all of the individuals on this list, as I explained before, in that book and was able to verify that either through that resource or from my own memory of the Chinese Government and its organizations that the individuals, or the organizations that they represented, were in fact bona fide organizations, noncriminal, not intelligence-related so far as I could determine. That is the basis of my judgment.

If I may just say that my question in there which you referred to, the "Who am I to complain?" was entirely meant in sarcasm.

Mr. BARR. Well, but then you didn't complain really. I mean, I just think that the process that seems to have been in place at that time really ill served the President where people could get in to see him; and again, it is not a matter of everybody likes to get in to see the President and then may be doing something with those pictures.

These were officials of a Communist Government whose national policy interests frequently don't coincide with ours, and yet there seems to have been virtually no effort made.

This isn't necessarily your fault, Mr. Suettinger. I am talking about the process that seems to have been in place at that time, very similar to what Mr. Aldrich wrote about in *Unlimited Access,* that I think raises some very serious concerns. That is the reason that we are looking into this.

It is not trivial. I think it goes to the heart of national security concerns of our country.

Mr. BURTON. Mr. Cummings.

Mr. CUMMINGS. I, too, want to thank you all for being here today.

Mr. Suettinger, I just want to ask you, you said a little bit earlier something that was very interesting. You said that when you looked at these folks who took the pictures with the President, you said—in answer to another question as to how high-ranking they may have been with regard to the Government of China, you said they were far below that. Those were your words. In other words, far below the President.

Can you elaborate on that a little bit, please?

Mr. SUETTINGER. The power structure——

Mr. CUMMINGS. Do you recall?

Mr. SUETTINGER. Yes, I do recall my answer.

The power structure in China is one that places the party obviously at the peak of the government structure. Also there is a separate but related structure of government, i.e., administrative offices, that take place. Since the beginning of what is called the reform period of China, which is about 1980, there has been an effort to split off and to sort of, the proper term is not privatize, but at least separate the operations of organizations such as business organizations or even, in some cases, ministries from the direct control of the party, because it was found that that was not a particularly efficient way to do business. So some of these organizations that were formally established—CITIC grew out of that kind of a process, to allow enough leeway for these individuals and organizations to make decisions that made sense in a business context and separate them from a political context.

These individuals were—I would say the equivalent of people perhaps at the deputy assistant secretary level would be comparable here, or perhaps even, in some cases, below that. They were not—they are not individuals who have significant political power or influence within the Chinese Government. They are people who are responsible for attracting business to China and for making sure that China receives investment from outside the country.

Mr. CUMMINGS. I think Mr. Fattah was mentioning a little bit earlier about when the President of China came here and how a lot of people were—elected officials, and many of them in this Congress—very happy to see him because he was bringing business opportunities to the United States. And I think Mr. Fattah mentioned Boeing in his district.

I wonder, is this something very unusual, in other words, for foreign governments to want to try to do business with the United States of America and its companies here? I am just curious.

Mr. SUETTINGER. My sense is, it is not unusual at all.

Mr. CUMMINGS. So I take it, when you went through the book, that you said you had some kind of document, a book in your office that basically gave you certain information about who some of these people may have been. Did you—looking at that book, did you get the impression that some of these folks were business people?

Mr. SUETTINGER. Yes, in the particular context of China's business operation.

Mr. CUMMINGS. And so it didn't strike you as odd that maybe these people, while going through Mr. Chung, this fellow who you called "The Hustler," were perhaps looking for some possible business opportunities; is that correct?

Mr. SUETTINGER. That is correct.

Mr. CUMMINGS. And now, was that a concern of yours, the fact that maybe they may have been looking for some business opportunities?

Mr. SUETTINGER. Not particularly a concern except insofar as it was involving the President.

Mr. CUMMINGS. Let me ask you this. You used the word "hustler," and it is a really interesting word. And I take it that you felt that this was someone who was trying to, I think, make himself out

to be—talking about Mr. Chung now—a lot more than what he was; is that right?

Mr. SUETTINGER. I used the term in the pool hall sense, sir.

Mr. CUMMINGS. I don't know what you mean by that.

Mr. SUETTINGER. Somebody who may be doing something different than what he appears to be doing at the outset and may have a private agenda that is not immediately evident.

Mr. CUMMINGS. So when you saw this, you wanted to make sure that your opinion was stated; is that correct?

Mr. SUETTINGER. That is correct.

Mr. CUMMINGS. And do you know whether anybody listened to your opinion or acted on your opinion?

Mr. SUETTINGER. Ms. Darby suggested that she had.

Mr. CUMMINGS. Ms. Darby, your job was basically to kind of do some screening; is that correct? Is that part of your job?

Ms. DARBY. Screening in terms of paperwork, yes.

Mr. CUMMINGS. And so when you were dealing with this issue, was there anything to cause you to feel that perhaps these were some fellows that were just looking for some business opportunities?

Ms. DARBY. The impression I got from Bob's response to my e-mail was that these were people who—or Johnny Chung, in particular, might try to use the photograph to put up on his wall to show that he had access to the White House and is friends with the President. But that is something that a lot of people do, and so only in that context.

Mr. CUMMINGS. So you didn't—so what you just said, that thought process that you just told us about, you didn't find that to be anything unusual, in other words, that people would want to try to use a picture of the President to make themselves look good and perhaps have certain influence in certain circles that they might not normally have; is that correct?

Ms. DARBY. That is correct, sir.

Mr. CUMMINGS. Thank you very much.

Mr. BURTON. The gentleman's time has expired.

Mr. Horn.

Mr. HORN. Thank you very much, Mr. Chairman. I am going to pursue some questions that concern Harry Wu.

As I recall, Mr. Suettinger—and we have gone over this memo of April 7, 1995 quite a bit—you had some suspicions about Mr. Chung. I assume that you might recall that Irene Wu, who is a staff member of Mr. Chung's firm, wrote a letter to Betty Currie, who is the secretary to the President, saying, "Please have President Clinton write me," this is write Johnny Chung, "a credential letter for my trip to China. I have enclosed a letter dated October 3, 1994, which I cannot use for this trip because it is for Taiwan. Thank you very much for your help."

Do you recall that you were consulted at all when the Wu situation of Harry Wu came up in relation to Mr. Chung?

Mr. SUETTINGER. I was not.

Mr. HORN. You don't recall anything on that?

Did you ever see the fax I just mentioned, which is exhibit 204? And 205 is a letter. That could have well come with the one from

Irene that would give Mr. Chung a glowing letter when he goes to China.

And if you look at 206, we have on stationery, Bill Clinton, October 3, 1994, to Mr. Chung, signed Bill, "Please let me extend my appreciation to you for your participation in my birthday celebration with your family on August 2nd. Your outstanding support and dedication to this administration is benefiting Americans across the Nation. I also want to express to you how essential your role has been in helping to bridge our countries' diverse communities. Your efforts to open lines of communication between our administration and the Taiwanese-American community are very much appreciated. Again, thank you for your support, for a job well done."

Then we get to 207 in the exhibit list, which is Johnny Chung to Betty Currie, secretary to the President, reference letter from the Democratic National Committee, thank you.

Now, here is the Democratic National Committee one: Dear—Mr. Johnny Chung, Chairman, CEO, Automated Intelligence Systems, so forth. "Dear Johnny, thank you for stopping by my office. I really enjoyed meeting your guests. You are to be commended for your efforts to build a bridge between the people of China and the United States. I want to express my appreciation to you for being a friend and great supporter of the Democratic National Committee. Good luck on your trip to China. Keep me informed."

Then we get to the White House memorandum of Janice Enright, Office of Chief of Staff, Mr. Panetta, to Anthony Lake, the National Security Advisor. That is exhibit No. 251, dated July 24, 1995.

I received a telephone call this morning, says Janice Enright, from Bobby Watson, Chief of Staff, Democratic National Committee, concerning the release of Harry Wu. Apparently Johnny Chung, a DNC trustee, is traveling with a group of people to China, meeting with the President of China this week. His mission is to negotiate the release of Harry Wu.

Now, was the National Security Council and you, as an agent expert there and a China expert, were they ever consulted that Johnny Chung was interested in a mission to China to help Harry Wu?

[Exhibits 204, 205, 206, 207, 208, and 215 follow:]

✓ Forward to ASC

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To: Betty Currie	From: IRENE for Johnny Chung
Date: 7-25-95 Time:	For Information Call: (310) 328-3883
Fax Number: 202-456-2883	Total Pages Including This Cover Page: 3

Please have President Clinton write me a credential letter for my trip to China. I have enclosed a letter dated Oct. 3, 1994 which I can not use for this trip because its for Taiwan.

Thank you very much for your help!

PLEASE STAFF

EXHIBIT
204

Building The U.S. Fax Highway Today

2771 Plaza Del Amo Suite 809, Torrance CA 90503

EOP 005053

July 25, 1995

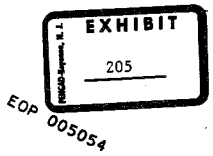
Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny,

It was good seeing you again last week. I want to thank you for the essential role you play in bridging our diverse communities and your help with my Administrtion. Your efforts in helping to open communications between China and the United States are much appreciated.

Congratulations on a job well done.

Sincerely,



EOP 005054

BILL CLINTON

October 3, 1994

Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo
Suite 809
Torrance, California 90503

Dear Johnny:

Please let me extend my appreciation to you for your participation in my birthday celebration with your family on August 2nd. Your outstanding support and dedication to this Administration is benefiting Americans across the nation.

I also want to express to you how essential your role has been in helping to bridge our country' diverse communities. Your efforts to open lines of communication between our Administration and the Taiwanese American community are much appreciated.

Again, thank you for your support and for a job well done.

Sincerely,

Bill

EXHIBIT
206

EOP 005055

AISI FAX COVER PAGE

AUTOMATED INTELLIGENT SYSTEMS, INC.

To: Betty Currie	From: Johnny Chung
Date: 7-25-95 Time:	For Information Call: (310) 328-3883
Fax Number: 202-456-2883	Total Pages Including This Cover Page: 2

Reference letter from DNC. Thank You

Building The U.S. Fax Highway Today

2771 Plaza Del Amo Suite 809, Torrance CA 90503

EOP 005056

EXHIBIT

207

07/25/95 16:44 DNC CHAIRMEN DODD AND FOWLER → AISI

DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler
National Chair

Christopher J. D
General C

July 25, 1995

Mr. Johnny Chung
Chairman/CEO
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, #809
Torrance, CA 90503

Dear Johnny:

Thank you for stopping by my office; I really enjoyed meeting your guests. You are to be commended for your efforts to build a bridge between the people of China and the United States. I want to express my appreciation to you for being a friend and a great supporter of the DNC.

Good luck on your trip to China and please keep me informed. Thank you.

Sincerely,

Donald L. Fowler

DLF/aed

EXHIBIT
208

RECORD TYPE: PRESIDENTIAL (ALL-IN-1 MAIL)

CREATOR:Kathleen M. Hennessy (HENNESSY_K) (WHO)

CREATION DATE/TIME:22-NOV-1995 11:31:31.38

SUBJECT:requests

TO:Lori A. Wiener (WIENER_L) (WHO)
READ:30-NOV-1995 10:53:14.48

TO:Janet M. Philips (PHILIPS_J) (WHO)
READ:22-NOV-1995 14:54:44.37

TEXT:
To: Lori Wiener
To: Janet Philips
Re: Johnny Chung
As of 11/22/95 per Bob McNeely, we will not honor requests from Johnny Chung, CEO of AISI. He has been improperly using photo of business people and the President. Bob suggests telling him the photos were ordered and sent out and can not be reordered.
He has been asking through the West Wing office but he might find our office at some point.
Thanks,
Kathleen

EOP 068372

EXHIBIT
215

Mr. SUETTINGER. The "they" being? I am sorry.

Mr. HORN. Was the NSC staff——

Mr. SUETTINGER. No, it was not.

Mr. HORN. You don't recall this then.

Now, what it says here is, Mr. Watson wanted to alert us that Mr. Chung plans to represent to the President of China that he is sanctioned by President Clinton in his efforts to get Mr. Wu released. He bases this representation on the fact that he recently saw the President during his trip to California, mentioned it to him, I believe, in a photo line, what he was doing in this regard. Apparently the President was supportive. To that extent, it is unclear, but nevertheless it is being construed as a validation that he will be the representative that way to the President of China.

Then we have a July 31, 1995, memorandum from you to Anthony Lake. That is exhibit 252. And you say, re the Democratic National Committee trustee, Johnny Chung, and the Harry Wu case, this memorandum also covers a response to package 5908 request for Presidential credentials letter for Johnny Chung. Memo from Leon Panetta's office—and then you give a tab A there on Chung—and his intent to try to get Harry Wu released is very troubling, in part because I was not able to contact the Democratic National Committee in time to get them to discourage Chung from involving himself in this diplomatically difficult, high-stakes issue.

Does that ring any memories——

Mr. SUETTINGER. Of course.

Mr. HORN [continuing]. With you at all?

How did you feel about that? Were you happy? Were you displeased, et cetera?

Mr. SUETTINGER. I was quite concerned.

Mr. HORN. And what were your reasons for concern?

Mr. SUETTINGER. My reasons were, as I indicated before, that I was concerned that an effort that had been ongoing since Mr. Wu's arrest, to get him released in the quickest and most appropriate way, might have been compromised or might have confused the Chinese Government by the intervention of Mr. Chung. And I thought that the DNC credentials letter was even more than I would have liked him to have in terms of his own travel to China.

Mr. HORN. Well, when they had that letter that just has "Bill Clinton" at the top of the stationery, was that ever discussed by the staff of the NSC, that is October 3, 1994, and that's just really, thanks; I assume that came out of the Democratic National Committee, but I am not positive.

Mr. SUETTINGER. I don't know the origin of the document, sir.

Mr. HORN. Really a political letter. Anyhow, you say here in this July 31st memo, I believe Chung means well, something of a self-appointed Ambassador of goodwill.

Now, what did Mr. Lake do about that?

Mr. BURTON. The gentleman's time has expired. We will let him answer the question.

Mr. SUETTINGER. Mr. Lake called me later on in the evening after he received that package, that memorandum from the—and asked if it was my view that we should try to contact either Mr. Chung or the United States Embassy in Beijing to try and forestall

or prevent Mr. Chung from engaging in any efforts on that supposed mission.

I replied that I didn't know where he was, I didn't know when he was going to arrive. I indicated that I doubted that he would see the President of China, and that it would be very difficult and might even further complicate efforts if we made strong efforts to try and prevent him from seeing anybody. So I thought there was probably little we could do.

Mr. HORN. I thank you. We might pursue some more of this later, Mr. Chairman.

Mr. BURTON. Mr. Kanjorski.

Mr. KANJORSKI. Thank you very much, Mr. Chairman.

I just listened, Mr. Suettinger, to your comments. And it strikes me that you seem to be a man who believes in doing everything through the normal order of things. There is a book of procedure and you follow the process; is that correct?

Mr. SUETTINGER. I try to be.

Mr. KANJORSKI. Have you dealt in political life as a nonprofessional? What did you do before you were at the NSC?

Mr. SUETTINGER. Before I went to the NSC, I worked at the National Intelligence Council, and prior to that, the Central Intelligence Agency.

Mr. KANJORSKI. But you haven't really been in politics, have you?

Mr. SUETTINGER. No, sir.

Mr. KANJORSKI. Would you be surprised to know that Members of Congress occasionally will arrange visits, private visits with heads of state from around the world through their own communications without having any contact through the State Department or the embassy in the area or anybody but private-sector individuals?

Mr. SUETTINGER. I am aware that that has happened.

Mr. KANJORSKI. Why would you assume that an American of Taiwanese ancestry, doing business and having quite a promotion—I am impressed with Mr. Chung's promotion—may not just convince some high-ranking officials and political operatives in China that if this would affect business in some way, this is something that should be handled?

Why would you conclude that that would not be strong or a possibility?

Mr. SUETTINGER. I am not sure I understand the thrust of your question, sir.

Mr. KANJORSKI. Well, I know that some members of the committee are shocked and think that it is impossible, what Mr. Chung may have done or could have done to have an impact. But I have seen that type of impact occur between private individuals and political individuals of other countries in dealing with very touchy questions. I could give you a perfect example myself.

Mr. SUETTINGER. Are you speaking of the Harry Wu case?

Mr. KANJORSKI. Yes, I am talking of the Harry Wu case.

It wouldn't seem unreasonable to me that if a well-connected, active American-Chinese businessman sat down with someone in the hierarchy of the Chinese Government or the business community and said you are really making it very difficult for us to try and develop business relationships here because you have this political

prisoner and the people in the bureaucracy don't seem to be paying attention or sensitive to the problem; and I am telling you as a businessman that this is—we don't know what your political problems are, but as a businessman, you are causing us a disconnect here.

Wouldn't that be a reasonable thing to happen?

Mr. SUETTINGER. Certainly there are circumstances in which that might be true.

My concern in this particular case was, one, that Mr. Chung seemed to have indicated that he was going to represent himself as somebody on a mission from the President, which was certainly not the case. It was also the case that Mr. Chung did not know what the administration had been doing to try to gain Mr. Wu's release, and his idea of what was appropriate might not be at all consistent with ours.

Mr. KANJORSKI. What if in fact he wasn't trying to really represent himself as an emissary from the President, but merely that he knew the President, or was a friend of President, quote, "friend of the President"? Would you still try to stop him, or do you think he would have no impact?

Let me give you an example. I referred to it earlier. Right after the Polish situation I was on a CODEL, an official congressional trip to Eastern Europe. The Members of that CODEL wanted to have an opportunity to meet with the political leadership, the head of Solidarity, Lech Walesa. At that time he was an unofficial, unelected individual in Poland and attempting to consolidate political influence. And regardless of how they tried, they couldn't get an audience with him.

I happened to know a friend. There was a businessman who has since become an American citizen, and he knew Lech Walesa, or anyway he purported to know him to me. And so since I was going to be over there, I said, I would like to try and have a meeting with him. This is the same individual who said, look, if you ever go to Rome, I would like to take you to meet the Pope. I didn't go to Rome and I didn't think I would get in to see the Pope that easily.

But I happened to call this fellow just by chance, and I said, look, I am going to be in Europe and let's break away from this trip for a day. I would like to fly up to Gdansk and have a meeting.

He called me back in 25 minutes and he said, you arrive at the airport, the car will pick you up, they will take you to Solidarity headquarters, and the leader will be at your disposal for any number of hours. You can select a group of four people, which I did, another Member of Congress and myself. We flew into Gdansk and we spent a very enlightened 4 hours with Lech Walesa.

The Ambassador to Poland couldn't get us there. The State Department, Secretary of State, couldn't get us there, and no one in the Congress of the United States could get us there.

Now, that is a personal experience I have had. I told the story about the Pope—since that time, many of my friends have taken up this friend and, by golly, they do go and spend time with the Pope.

So people in private life do sometimes have connections or appearances of being able to still the waters. There is a sequence here that you can say is coincidental, could be a seizure of opportunity,

someone trying to get in on a good thing, taking advantage, because we are dealing with someone here that, quote, is "a promoter," but there is also an outside possibility that the Chinese Government and Chinese business community would take more stock in something a Chinese-American businessman would be telling them than all officialdom, who they are dealing with on a regular basis and may not be impressed with.

Haven't you had those experiences down there?

Mr. SUETTINGER. I readily concede the point that unofficial and informal communications can sometimes have a very beneficial effect on the development of relations. In this particular instance, I was not persuaded that Mr. Chung was operating on the same wavelength as the rest of us, that he fully understood the complexity and nuance of American policy or that, indeed, he had been given such a mission by the President. And so I thought it was appropriate for me to raise a warning flag for Mr. Lake, and that is what I did.

Mr. BURTON. The time of the gentleman has expired.

Mr. KANJORSKI. Thank you, Mr. Chairman.

Mr. BURTON. Mr. McHugh.

Mr. MCHUGH. Thank you, Mr. Chairman.

I just wanted to followup on a couple of comments you made earlier. In response to some of the questions, you said that you did not know that Johnny Chung was an agent of the Communist Government, true? Both of you, I believe, said that.

Mr. SUETTINGER. I have no basis on which to make such a judgment.

Mr. MCHUGH. Ms. Darby, you said that as well. Do you have any basis on which to say he is not an agent?

Mr. SUETTINGER. Similarly, no.

Ms. DARBY. Nothing.

Mr. MCHUGH. Mr. Suettinger, you defined a "hustler," I think, very appropriately, someone who has an agenda that may not be readily apparent. Did I hear you correctly?

Mr. SUETTINGER. Yes, sir.

Mr. MCHUGH. Did you have an opportunity or cause to speculate as to what Mr. Chung's hidden agenda might be?

Mr. SUETTINGER. I did not have any specific indications of his agenda other than, as I outlined it in the e-mail, which was based on an earlier conversation.

Mr. MCHUGH. In that e-mail, you made the comment that you felt that the President might not wish to be associated with some of these business undertakings; do you recall that statement?

Mr. SUETTINGER. Yes, I do.

Mr. MCHUGH. What speculation were you assessing there? How did you come to that judgment and what kinds of business undertakings were you concerned might not be appropriate for the President to be associated with?

Mr. SUETTINGER. It was really a generic kind of comment on my part. As I indicated earlier in the e-mail, I was concerned that Mr. Chung would do this repeatedly and would bring a series, a sequence of individuals in to see the President. And I certainly had no confidence that we would be able to verify that all of them were bona fide officials or engaged in legitimate business operations.

I was just concerned with protecting the President from future problems that might exist because of the association with Mr. Chung.

Mr. MCHUGH. So you were concerned where the situation might lead rather than where you could definitively say it was at that moment?

Mr. SUETTINGER. That is correct.

Mr. MCHUGH. OK. Earlier you talked about the recent separation in mainland China, the PRC, between the structure of the political party and the business side of the society, trying to provide the business undertakings with a certain freedom from the political apparatus; is that correct?

Mr. SUETTINGER. Yes.

Mr. MCHUGH. Is my understanding correct, however, that ultimately it all does come back to the party, that indeed any indigenous Chinese business undertaking not only is concerned but ultimately responsible to the political structure?

Mr. SUETTINGER. I think, as a general statement, yes, that is correct.

Mr. MCHUGH. Thank you.

Ms. Darby, how long were you at NSC?

Ms. DARBY. From February 1993 until August 1995.

Mr. MCHUGH. During your time there, how many opportunities did you have to do a vet such as this, where you were asked to look over a particular—appropriate individuals and make a recommendation as to whether or not the President should be associated in this instance with the pictures?

Ms. DARBY. This situation, I don't recall ever having a similar counterpart during my tenure at the NSC. Again, this was an after-the-fact request for guidance and the standard practice was that we were consulted prior to any events like this taking place. As I said earlier, my contacts with the President's office where senior White House staff would have been maybe four to eight times a month maybe. It is really hard to say. It varied a lot.

Mr. MCHUGH. Were your recommendations generally accepted?

Ms. DARBY. I wouldn't say in particular that they were my recommendations. I was not a policy specialist at the NSC. I relied on the guidance of the policy staff of the NSC, and if something required a real policy decision, I would refer it to Nancy Soderberg or another senior person on the staff.

Mr. MCHUGH. You made a recommendation in this case?

Ms. DARBY. It was more of a personal recommendation rather than—there were no real foreign policy concerns that I could see. Johnny Chung did not appear, from Bob Suettinger's e-mail, to pose a national security risk, so it really wasn't so much a question of whether, for foreign policy reasons, they should not be delivered.

Mr. MCHUGH. Was this the first time you had to make a personal recommendation during your time there?

Ms. DARBY. I really don't recall.

Mr. MCHUGH. Do you have any observations about this case where your personal recommendation was not apparently observed?

Ms. DARBY. About this case?

Mr. MCHUGH. Yes.

Ms. DARBY. I do not know what the disposition of the photos was, so I really couldn't comment.

Mr. MCHUGH. I see.

I have a very brief amount of time left. Mr. Suettinger, let me return to you very briefly. There seems to be a lot of concern about the situation where people you described as free-lancers go out and undertake certain missions unto themselves. I think we would all agree that that does happen very frequently, whether they are officials of Government or whether they are private business people. But I believe I am hearing you say, at least from your perspective, this one was of particular concern and somewhat unusual in that it was a national political party providing a letter of introduction or at least some form of credential.

Did I hear you correctly, listing that as an unusual concern on your part?

Mr. SUETTINGER. I was concerned that there was a credential in the form of a letter from the DNC.

Mr. MCHUGH. I see my time has expired. Thank you, Mr. Chairman.

Mr. BURTON. Mr. Fattah.

Mr. FATTAH. Mr. Chairman, I think we have exhausted our 5 minutes on the first round. You still have a Member who has not yet used their first round.

Mr. BURTON. You also have 5 minutes, even though you spoke during the 30 minute round.

Mr. FATTAH. Thank you, Mr. Chairman, if you insist.

Let me proceed forward on this. I do want to say that, notwithstanding our legitimate interactions, I think that—there is one issue that I think that we could share in and that is that this committee, even though it has spent a few million dollars in the beginning of its investigation, we have a number of intelligence agencies and law enforcement agencies that have multibillion dollar budgets. And if there is information that the FBI or the CIA or the National Security Agency or anyone has that could be useful to the purposes that the chairman has outlined in terms of trying to filter out whether or not there was foreign—illegal foreign activities vis-a-vis our election, that information should be brought forward.

Plus it might help us that if, with all of their ability, they haven't found anything, then maybe we could put this to rest sooner rather than later. So either way, it may be of some use.

I do want to get to the point that was raised, and that is that under questioning from the gentleman from Georgia, he got you to admit that at all times there are foreign governments who from time to time might have or may want us to have a different viewpoint about a certain matter; and they have very legitimate and appropriate ways in which they can communicate their viewpoints to our Government.

I guess the question really is, under this investigation, we are trying to determine, since there have been allegations made that the Chinese Government wanted to influence Members of Congress, they were concerned about these votes on the most-favored-nation, or whatever the case may be, or their relationships generally with the Congress that they wanted to have an impact.

In terms of this matter with the photos and with Johnny Chung, is there any information that somehow this had something to do with the People's Republic of China, either legally or illegally or inappropriately trying to influence the Congress of the United States?

Mr. SUETTINGER. With all due respect, Congressman, your question takes me somewhat beyond the scope of what I have been asked to testify about.

The simple answer to your last question is, I have no way of knowing.

Mr. FATTAH. OK. Well, I have no way of knowing either, because we are really hung up on the fact that these gentlemen got into this radio address and that they got in through Johnny Chung's entre, through the DNC, and that they got a picture taken.

And then there is a lot of question what happened to the picture—whether they got the picture, whether they didn't—and we have been going back over this for at least 2 days now. We are not even clear whether or not the pictures were ever released to the gentlemen involved. But it doesn't seem to me to have anything to do with the central question of our investigation.

So I realize that you may be at a loss, but I am also at a loss. It may be useful, I guess, to just run through it one more time.

You had nothing to do, Ms. Darby, with approving these gentlemen to go into the radio address?

Ms. DARBY. No, I did not.

Mr. FATTAH. You were not present at the radio address?

Ms. DARBY. No, I was not.

Mr. FATTAH. Your only responsibility in this matter was that you were asked by Ms. Crawford whether or not since the President had raised a concern whether or not these photos should actually be released, and you said, look, we have a lot of other important things to do around here. Why don't you err on the side of caution and not release the photos? And you sent a memo that said, look, you don't see any lasting harm in the photos being released and neither one of you have any idea what the actual disposition of the photos is at this time; is that correct?

Mr. SUETTINGER. That is correct.

Ms. DARBY. That's correct.

Mr. FATTAH. I want to thank you for your presence here today. I want to thank the chairman for yielding me our due 5 minutes. We will not even use it all. We yield it back.

Mr. BURTON. Thank you, Mr. Fattah.

Mr. Souder.

Mr. SOUDER. Yesterday in the testimony we heard from Nancy Hernreich that apparently at least one of the photos was released. Does that bother you, Ms. Darby?

Ms. DARBY. I was not aware that there was more than one photo. It doesn't bother me. As I say, I don't think there were foreign policy implications that Bob made me aware of in this e-mail about the photos being released.

Mr. SOUDER. Is it typical that when you would express caution and suggest that it might not be wise to release them that the White House would release them anyway?

Ms. DARBY. I really have no idea. I didn't usually, I didn't get followup information on whether they took my advice or not, but again generally it was not my advice as an NSC foreign policy specialist.

Mr. SOUDER. Well, it was certainly Mr. Suettinger's e-mail, as well, expressing concerns. Do you know very many other times that you may have expressed concerns regarding certain photos at the White House?

Ms. DARBY. I don't recall any other specific incident, sir.

Mr. SOUDER. So this may be in-fact the only case where you expressed concern to the White House about a photo and they didn't listen?

Ms. DARBY. I am not sure that they didn't listen.

Mr. SOUDER. If indeed the testimony yesterday was accurate that at least one photo has been released, then they didn't follow your caution at least. Would that not be a fair statement?

Ms. DARBY. Again, it was my personal caution. It was not based on any foreign policy implications I saw in turning the photograph over.

Mr. SOUDER. I wanted to ask you one other question as well. Clearly, there was a kind of a flurry of activity here around April 7 because Mr. Chung was coming in. Had they requested this earlier, an opinion from your office? Was it sitting on a desk among other requests, or why was this almost a month later?

Ms. DARBY. I am not aware of any other request relating to this other than the one that we have been discussing and is reflected in this e-mail. But I think the sense of urgency was probably because the photographs take several weeks to be developed and they probably had just been developed and Johnny Chung was coming in the following day to pick them up.

Mr. SOUDER. So you are saying it isn't correct that the White House contacted you right after the photo to do a background check about releasing it? There was certainly the implication under testimony here that there was an immediate contact to your office rather than a delay of almost a month.

Ms. DARBY. There wasn't a contact that I am aware of, no.

Mr. SOUDER. Thank you.

Mr. Suettinger, I think your e-mail was, which is exhibit 198, was very informative. In other words, you said you didn't have any direct evidence, but you expressed future concerns, which I would hope that any White House would take seriously, coming from the National Security Council.

One of the statements that you made to Mr. McHugh is that while you didn't have any evidence that these people were agents, you didn't have any evidence that necessarily they weren't. I heard you say earlier, too, that you felt they were relatively low level or less powerful. Wouldn't it be true that if somebody wanted to try to start to influence a system that in fact if they would have sent more powerful people or people who had more of a history that, in fact, you would have caught them, and wouldn't that argue not that they are but that this is one way you could do it? In other words, it would have flagged your system, had they been higher up. Why would that argument not be a concern as well?

Mr. SUETTINGER. I am really not in a position to speculate about whether there was a conspiracy afoot in this case to utilize a photo opportunity toward broader purposes. My understanding is, I answered the e-mail, was that there was no national security concern with regard to the individuals involved and that remains my view.

Mr. SOUDER. My point, however, is that had they had a record or been more influential, you might have said definitely, no, to the photos?

Mr. SUETTINGER. I was not in a position—I see, I am sorry. I misunderstood you. It is very difficult for me to speculate on what might have taken place had circumstances been different. I responded to the circumstances as I understood them at the time.

Mr. SOUDER. Isn't that what your e-mail does? It is speculation. You say that there could be other individuals, there may be times, would be ones the President would support. You were concerned about how this could not only go long-term with Johnny Chung, but how this process could be misused.

Mr. SUETTINGER. My concern was really in making sure that the President was protected more from kind of perhaps shady business deals than from an effort to influence his opinion in any way, shape or form.

Mr. SOUDER. Don't you think that when they contacted your office they were concerned about national security things, not just whether or not they were——

Mr. SUETTINGER. You mean when Mr. Chung contacted my office?

Mr. SOUDER. When the White House asked about using these pictures, do you think they were asking you whether or not you—they wanted your advice on how business deals were going, or do you think they were asking your advice on national security matters?

Mr. SUETTINGER. I really can't speculate on what prompted them to raise the concern or in what context. I responded to the question again, as I indicated earlier, from a national security perspective. But in my comments vis-a-vis Mr. Chung, I was really thinking more of repeat performances that might have a different cast of characters.

Mr. SOUDER. Do you get questions about businessmen on a routine basis on most of the requests that come to you related to national security?

Mr. SUETTINGER. There have not been that many. You are referring to requests for vetting?

Mr. SOUDER. Yes.

Mr. SUETTINGER. Most of them involve individuals who are not known to be Government officials. In other words, they would be more businessmen and private individuals, academics and so forth.

Mr. SOUDER. But you are vetting for national security, not for hustling?

Mr. SUETTINGER. That is correct.

Mr. SOUDER. Because, and it is not—it is hard to be in the position of not wanting to question an individual's integrity, yet based on what we saw this morning that, in fact, we do have agents of influence trying to influence things and that some of that information was withheld. We need to be as aggressive as possible in ask-

ing some of these questions and laying this out as this hearing goes through.

I yield back.

Mr. BURTON. The time of the gentleman has expired. Mr. Waxman is the next.

Mr. FATTAH. If the gentleman will yield, I just wanted to correct the record. I think the gentleman mistakenly misspoke in that the testimony yesterday from Mrs. Hernreich was not that the photos had been released. In fact, her testimony several times yesterday was that she was not at all, it was not at all her belief that the photos were ever released. She did not even acknowledge that they had been released. I just wanted to correct the record as to whether or not these photos were ever released and we are going to continue to search for the truth in this regard.

Mr. SOUDER. My understanding was one photo. If I said photos, it was a mistake. One photo.

Mr. WAXMAN. Reclaiming my time, just also for the record, the only thing that we had in the newspaper today was that the FBI didn't give some information to this committee, and I think it is a big leap from that to say that we learned about spying because we didn't learn about that. We may, but no one knows that at this point. So we don't know whether the photos were ever released. We do know Mr. Suettinger was asked whether they should be released and he said he didn't think any lasting damage would be done to U.S. foreign policy if they were released to Johnny Chung. I want to yield the balance of my time to Mr. Cummings.

Mr. CUMMINGS. Thank you very much, Mr. Waxman.

First of all, let me take a moment. This hearing, I think, will be winding down very shortly, but I want to thank you both for your service to the United States of America. I know that this is not the most pleasant situation for you. But I think you symbolize the very best that America has to offer. I do mean that. It was just, someone just said a few minutes ago, Mr. Suettinger, that you were a person, I think it was Mr. Kanjorski who said that you were a person that went by the books. And I think the same thing can be said of you, Ms. Darby. I just want to thank you on behalf of all of us. I am sorry that you have to go through this, but this is, I guess, a part of the process.

Mr. Suettinger, I want to also say to you that I really admire you for your ability to kind of figure out who is a hustler and who is not. It is interesting that Mr. Chung is an equal opportunity hustler. Because he has a book, I don't know if you have seen this document. But it is automated, it is called Automated Intelligence Systems, Inc. I think this was his corporation. Have you seen this? It is a brochure.

Mr. SUETTINGER. I have not, sir.

Mr. CUMMINGS. I think your worst fears about what a hustler does is epitomized in this document because he not only has pictures of him, it is full of pictures, by the way, and he not only has pictures of him and the President, but he has a picture of him and our illustrious Speaker of the House, Newt Gingrich. He has a picture of him and the Governor of California, Pete Wilson. He has a picture here of he and the majority leader, former majority leader and former Presidential Republican Candidate Bob Dole. So he

really made sure that he did exactly—and I admire you for figuring this out, that this guy was a hustler, equal opportunity. It is very interesting.

I also want to note something else. I was wondering, exhibit 215, are you familiar with this? This is a document which is apparently from, it is dated November 22, 1995. It is apparently to a Lori Weiner from a Kathleen Hennessey. I take it that this is from the photography shop in the White House. Are you familiar with that document?

Mr. SUETTINGER. I have not seen this document before, sir.

Mr. CUMMINGS. Let me just read it. It says, "as of 11/22/95, per Bob McNeely," do you know who that is?

Mr. SUETTINGER. I do not.

Mr. CUMMINGS. "We will not honor requests from Johnny Chung. He has been CEO of this corporation. He has been improperly using the photo of the business people and the President. Bob suggests telling him the photos were ordered and sent out and cannot be reordered. He has been asking through the west wing office, but he might find our office at some point. Thanks, Kathleen."

So again, I go back to your fears and your concerns. It appears that the photo office in the White House, again, later on, found a way to kind of block this hustler that you talked about. Yesterday it was brought up, I don't know whether you reviewed the testimony yesterday on C–SPAN, but it is also interesting to go back to this whole question of the equal opportunity hustler.

In a letter dated April 6, 1994, but from all people, the Governor of the State of California, Pete Wilson. I just want to reiterate it so that the record will be clear that he not only was trying to pimp the President, but he was trying to also do the same thing with Mr. Wilson, Governor Wilson. I just want this, again, to be reiterated.

It is addressed to Mr. Chung. It says,

> Dear Mr. Chung: It is my understanding that you have been nominated as entrepreneur of the year. Congratulations. It is a well-deserved recognition. My communications and press offices inform me that you and your team have performed in an outstanding manner. Your good work in turn has enabled my office to serve the people of California effectively and efficiently, especially during California's recent disasters. Again, you have my appreciation for a job well done.

And that is signed by the Governor of the great State of California, Pete Wilson. So again, I know that it may sound like there was a little bit of sarcasm, but I do admire both of you for what you have done. I thank you for being the good employees that you have been for the United States of America and, again, on behalf of all of us, I thank you for your testimony today. I yield back to the ranking member.

Mr. WAXMAN. I yield back the balance of my time.

Mr. BURTON. The gentleman yields back the balance of his time. I have the last 5 minutes and I will yield my time to Mr. Barr.

Mr. BARR. Thank you, Mr. Chairman. There is a major difference, just for the record, between what was just stated with regard to the Governor, former Governor, whatever, of California. He was not the recipient of $3 or $400,000 in Mr. Chung's largess. That makes a big difference.

Going back to SINOPEC, this is not a small corporation, is it, Mr. Suettinger? Is it not the fourth largest petrochemical company in the world?

Mr. SUETTINGER. If that is information that you have derived from other sources, I have no means—I mean it is a large—it is a large state entity.

Mr. BARR. Commercial entity, dealing in the billions of dollars? Dealing in the billions of dollars?

Mr. SUETTINGER. I would assume so. The oil business does make lots of money.

Mr. BARR. You can assume that since particularly in October 1997 SINOPEC announced an agreement with Exxon and ARAMCO for a joint feasibility study for a refinery and petrochemical complex in east China's coastal Province of Fukien, which will involve a total investment of $3 billion. So somewhere along the line SINOPEC has done real well.

SINOPEC was, as you all may or may not know, the corporation that wanted the meeting with Energy Secretary O'Leary at which time Mr. Chung was directed to contribute $25,000 so that that meeting could take place, that $25,000 was given to Africare, Ms. O'Leary's favorite charity, at her direction, picked up by an employee of the Energy Department.

So there is a lot more at stake here than just a two bit hustler and a few photographs. There are billions of dollars at stake here and the national security interests of at least two of the major powers of the world, the United States and China, and also Saudi Arabia. That was also part of what SINOPEC was after.

So it still leads me to scratch my head and figure out why no red lights went off. I know that the e-mails we have been talking about here postdate by a month the meeting at the White House, but we now know that there was an awful lot that took place subsequent to that such as the payment at the direction of Ms. O'Leary, a number of other efforts by SINOPEC and by Mr. Chung involving perhaps Ron Brown and others, according to letters that are in exhibits here. And I would ask Mr. Suettinger, if you had before you all of the information that we now have and if you had this information not on April 7, 1995, but on March 7, 1995, would the attitude have been the same in responding to Ms. Darby's e-mail.

Mr. SUETTINGER. With all due respect, Congressman, you are asking me again to speculate on what I would do in different circumstances. It is very difficult for me to do that, certainly, given the way the information has been, the way that you have characterized the information.

Mr. BARR. You can characterize it anyway you would like. All I am saying is, is there anything that you have become aware of or just based on your review of who these gentlemen were, do you still believe them to be essentially two bit players that have no real interest beyond just getting a picture with the President that would cause you to have given a different recommendation if you had had that information before you on March 7? Yes, I am asking you to speculate.

Mr. SUETTINGER. Again, my remarks at the time were based upon my understanding of what constitutes a photo opportunity: a handshake, a friendly word and then head for the door. So it is not

my belief that there was anything politically significant likely to transpire during the period of a photo opportunity. So even had I been asked in advance, I don't think I would have changed my view.

Mr. BARR. Then I take back some of the nice things I said earlier. I think that your work and your statements indicate that there is not an effort to really serve the national interest of this country well. You understand even in your e-mail that there was a political effort here by contributors to seek access to the President. We know now that some of those contributors were, wanted things involving billions of dollars from this country that would benefit the Communist Chinese Government at a minimum in a major economic way, and you are still saying that that would not cause you to recommend that they not have access to the President. I must admit, I am just flabbergasted. I yield back.

Mr. SUETTINGER. I would certainly——

Mr. FATTAH. Mr. Chairman, would you yield some of your available time?

Mr. BURTON. Mr. Horn needs some time. I will yield to Mr. Horn. If I have any left of course, I will yield to you.

Mr. HORN. Thank you, Mr. Chairman. Just one question because I am curious as to the relationship with Mr. Chung that crossed your desk before the April 7th memorandum in which you say, having recently counseled a young intern from the First Lady's office who had been offered a dream job by Johnny Chung, I think he should be treated with a pinch of suspicion.

Now, we read into the record earlier the memorandum you wrote to the President's National Security Advisor, Anthony Lake, on July 31, 1995. I am curious what came before April 7 that you remember, what came after July 31, 1995, that involved Mr. Chung that you remember? Is this all that you were involved in? Obviously, you counseled this intern before April 7. That helped lead you to a conclusion about Mr. Chung. What happened, anything else before April 7? Anything else after July 31st? Anything in between?

Mr. SUETTINGER. As I indicated, I had some phone calls from Mr. Chung that caused me to be concerned about his own agenda. Again, I can't—I did not put them on the record at the time and they are not available either to my recollection or to any other record.

The meeting with the intern from the First Lady's office is likewise not on record. She called me in the morning, said that somebody had suggested she come to talk to me, and I did so. She described a position that she was being offered by Mr. Chung that caused me some concern, that appeared she was going to be hired as someone whose principal responsibilities would be to provide some sort of escort for some of these individuals coming into town, and that her service, at that point, former service, with the First Lady's office would also be used as an entre to get some of these individuals to see people in the First Lady's office.

I found that to be something that aroused my suspicion. She was about my daughter's age and so I counseled her that the jobs that seem to be too good to be true usually are not true, and that she ought to find out as much information as she could about what was

being offered and what was going to be expected of her before she accepted any kind of a dream job. As I say, that sort of colored my perception of what Mr. Chung was up to, to a significant degree. And after July 31st, according to your question, I have had no contact with anything to do with Mr. Chung, other than what I have been able to read in the newspapers.

Mr. HORN. Thank you very much.

Mr. BURTON. All time has expired. I want to thank both of you for being with us today. We appreciate your candor, and hopefully we won't have to bother you again, but if we do, we will try to make sure we accommodate your schedules.

Per our agreement with the minority, I ask unanimous consent that the depositions of Ari Swiller, Dick Morris, and Eric Sildon be made public. Without objection, so ordered.

The continuation of the meeting with Johnny Chung will be in the lounge of the committee, so those who want to attend and participate in that discussion will go there immediately upon adjournment. This committee stands adjourned.

[Whereupon, at 2:29 p.m., the committee was adjourned.]

[The depositions of Ari Swiller, Dick Morris, and Eric Sildon follow:]

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
U.S. HOUSE OF REPRESENTATIVES,
Washington, DC.

DEPOSITION OF: JACOB ARIEH SWILLER

FRIDAY, AUGUST 22, 1997

The deposition in the above matter was held in Room 2203, Rayburn House Office Building, commencing at 10:00 a.m..

Appearances:

Staff Present for the Government Reform and Oversight Committee: James C. Wilson, Senior Investigative Counsel; Miki White, Investigative Counsel; Christopher Lu, Minority Counsel; and Michael J. Yeager, Minority Counsel.

For MR. SWILLER:

STUART F. PIERSON, ESQ.
Levine Pierson Sullivan & Koch, L.L.P.
1155 Connecticut Avenue, N.W., Suite 700
Washington, D.C. 20036

Mr. WILSON. Good morning. On behalf of the members of the Committee on Government Reform and Oversight, I appreciate and thank you for appearing here today.

This proceeding is known as a deposition. The person transcribing this proceeding is a House reporter and notary public. I will now request that the reporter place you under oath.

THEREUPON, JACOB ARIEH SWILLER, a witness, was called for examination by Counsel, and after having been first duly sworn, was examined and testified as follows:

Mr. WILSON. I would like to note for the record those who are present at the beginning of this deposition. My name is James Wilson. I'm the designated Majority counsel for the committee. I'm accompanied today by Mickey White, who is also with the Majority staff. Mr.——

Mr. LU. Lu.

Mr. WILSON. Christopher Lu and Michael Yeager are with the Minority staff. And Mr. Ari Swiller is accompanied by Mr. Stewart Pierson.

Although this proceeding is being held in a somewhat informal atmosphere, because you have been placed under oath, your testimony here today has the same force and effect as if you were testifying before the committee or in a courtroom. If I ask you about conversations you have had in the past and you're unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and then you may give me the gist or substance of any such conversation to the best of your recollection.

If you recall only part of a conversation or only part of an event, please give me your best recollection of that conversation or that event or the parts of the event or conversation that you do recall.

If I ask you whether you have any information about a particular subject and if you have overheard other persons conversing with each other regarding that subject or have seen correspondence or documentation regarding that subject, please tell me that you do have such information and indicate the source, either a conversation, documentation or otherwise from which you derive such knowledge.

Before we begin questioning, I would like to give you some background about the investigation and your appearance here. Pursuant to its authority under House rules 10 and 11 of the House of Representatives, the committee is engaged in a wide-ranging review of possible political fund-raising improprieties and possible violations of law.

Pages 2 through 4 of House Report 105–139, summarizes the investigation as of June 19, 1997, and encompasses any new matters which arise directly or indirectly in the course of the investigation. Also, pages 4 through 11 of the report explain the background of the investigation.

All questions related either directly or indirectly to those issues or questions which have the tendency to make the existence of any pertinent fact more or less probable than it would be without such evidence are proper.

The committee has been granted specific authorization to conduct this deposition pursuant to House Resolution 167, which passed the full House on June 20, 1997. Committee Rule 20 outlines the ground rules of this deposition.

Majority and Minority counsel will ask you questions regarding the subject matter of the investigation. Minority counsel will ask questions after Majority counsel has finished. After the Minority counsel has completed questioning, a new round of questions may begin. Members of Congress that wish to ask questions will be afforded an immediate opportunity to ask their questions. When they are finished, committee counsel will resume questioning.

Pursuant to the committee's rules, you are allowed to have an opportunity present to advise you of your rights. Any objection raised during the course of the deposition shall be stated for the record. If the witness is instructed not to answer a question or otherwise refuses to answer a question, Majority and Minority counsel will confer to determine whether the objection is proper. If Majority and Minority counsel agree that the question is proper, the witness will be asked to answer the question. If an objection is not withdrawn, the Chairman or a Member designated by the Chairman will decide whether the objection is proper.

This deposition is considered as taken in executive session of the committee, which means that it may not be made public without the consent of the committee. Pursuant to clause 2(k)(7) of House Rule 11, you are asked to abide by the rules of the House and not discuss with anyone other than your attorney or attorneys this deposition and the issues and questions raised during this proceeding.

Finally, no later than 5 days after your testimony is transcribed and you have been notified that your transcript is available, you may submit suggested changes to the Chairman. The transcript will be available for your review at the committee office. Committee staff may make any typographical or technical changes requested by you. Substantive changes, modifications, clarifications or amendments to the deposition transcript submitted by you must be accompanied by a letter requesting the changes and a statement of your reasons for each proposed change.

A letter requesting any substantive changes must be signed by you. Any substantive changes made shall be included as an appendix to the transcript, conditioned upon your signing of the transcript. It's my understanding that you've come from a long distance, and at the conclusion of these proceedings we'll make arrangements for you to review your deposition transcript in a way that's convenient for both yourself and your attorney.

Do you understand everything that we've gone over so far?

The WITNESS. I do.

Mr. WILSON. Do you have any questions about anything I've discussed so far?

The WITNESS. No.

Mr. WILSON. I've got a few preliminary questions to ask of the witness. Does anybody else have any statement or comment at this time?

Mr. LU. Not at this time.

Mr. PIERSON. I do. First of all, your preliminary instructions to the witness about what you would like him to say if he should answer a particular way are general questions that typically you find at the beginning of written interrogatories and are easy for a respondent to attend to since they'll be right there before him in writing.

I would expect that if Mr. Swiller gives you an answer that he either doesn't recall or doesn't know or is not sure, that you will be appropriately following up with questions about what he does know or what he may remember so that he will not have to remember specifically every item of your preliminary instructions.

With respect to the transcript, I appreciate your indication that you'll make it available to him since he's in California currently. He lives there now and has a residence there. He is also getting married at the end of this month and will also not be accessible for a while afterward, as you expect. We appreciate you making appropriate accommodations for reading the transcript.

Finally, I refer to my letter, July 3, 1997, to the committee in which I responded to dates of Mr. Swiller's deposition. Among other things, I have advised the Chairman that he should be advised Mr. Swiller testified extensively recently in depositions taken by the Senate committee inquiring into this.

We would be pleased to give you permission to read the transcript of that deposition and thereby to avoid the inevitable repetition that would result as you pursue the same lines of inquiry. I take it, counsel, that you have not undertaken to read the transcript of Mr. Swiller's deposition in the Senate.

Mr. WILSON. We have not been given a copy of Mr. Swiller's deposition transcript from the Senate. And I appreciate your initial offer. And we would certainly have taken up your suggestions. But we have not been permitted to see or review a copy of that deposition.

Mr. PIERSON. Can you tell me whether the Senate committee has been advised whether we would be given permission to do so?

Mr. WILSON. I honestly don't know specifically in your case. But there have been a number of witnesses who have made similar offers, and we have advised the Senate in each instance that there have been no objections and my understanding is that there's a matter of Senate protocol and the particular rules under which they are functioning and that specific investigation in which Mr. Swiller gave his deposition. At this point, we do not have access to most of the depositions taken. Some have been released. And those have involved individuals who have testified publicly. Unfortunately, Mr. Swiller's is not one of them.

Mr. PIERSON. Finally, I understand that under the rules, this deposition is being taken in executive session. I appreciate that. And I appreciate the instructions. Of course, Mr. Swiller is entirely at liberty to talk to anybody about what he has said here today at any time. Moreover, if any report of his testimony should be leaked from the committee or from its staff, we will consider that executive session instruction to be devoid.

Mr. LU. If I may, I would just like to second Mr. Pierson's concerns about Mr. Swiller's deposition in light of the Senate deposition. The Democratic staff has always believed that these depositions should be put off until after the release of their Senate depositions. Obviously, we have not had our way. So I would simply just second that. We appreciate you coming in. We realize this has been a burden for you, especially since a lot of the testimony you'll be giving today will be duplicative testimony to the Senate.

Mr. PIERSON. That's all I have.

EXAMINATION BY MR. WILSON:

Question. Mr. Swiller, I'll be asking you questions concerning the subject matter of this investigation. Do you understand?

Answer. Yes.

Question. If you don't understand a question, please say so, and I'll repeat it or rephrase it so that you are able to understand the question. Do you understand that you should tell me if you do not understand my question?

Answer. Yes.

Question. The reporter will be taking down everything we say and will make a written record of the deposition. You are asked to give verbal, audible answers because the reporter cannot record a gesture or nonspecific answer. Do you understand that you should not answer uh-huh or provide a gesture to answer one of my questions?

Answer. Yes.

Question. If you can't hear me, please say so and I'll repeat the question or have the court reporter read the question to you. Do you understand that?

Answer. Yes.

Question. Please wait until I finish each question before answering it, and I will wait until you finish your answer before I ask the next question. Do you understand that this will help the reporter to make a clear record because she cannot record what we are both stating at the same time?

Answer. Yes.

Question. Your testimony is being taken under oath as if we were in court, and if you answer a question, it will be assumed that you understood the question and the answer was intended to be responsive to it. Do you understand that?

Answer. Yes.

Question. Are you here voluntarily or are you here as a result of a subpoena?

Answer. Voluntarily.

Question. Do you have any questions about this deposition before we begin the substantive portion of the proceeding?

Answer. No.

Question. Please state your name and spell it for the record?

Answer. It's Jacob Arieh, A-R-I-E-H, Swiller, S-W-I-L-L-E-R.

Question. Have you in the past used any other name or gone by any other name?

Answer. Ari Swiller is what I generally go by. It's A-R-I, same last name.

Question. What is your date of birth?

Answer. [Redacted].

Question. What is your current address?

Answer. [Redacted].

Question. What was your last address in Washington, D.C.?

Answer. [Redacted].

Question. Have—have you lived for a period of more than 6 months out of the United States?

Answer. I have not.

Question. Did you attend college?

Answer. I did.

Question. Where did you attend college?

Answer. [Redacted].

Question. And when did you graduate?

Answer. [Redacted].

Question. Have you received any other degrees?

Answer. I have not.

Question. Please briefly describe your employment history after college?

Answer. My first—after college, I traveled for a few months and moved to Washington in early 1992. I was an intern for the office of Matt McHugh, a Member of Congress from the State of New York. At the same time I began to volunteer at the Clinton for President Campaign.

In approximately April or May of 1992, I became a full-time staffer in the Clinton for President Campaign in the Finance Department. We transferred to the Democratic National Committee following the 1992 convention in New York. After the November election, I worked for the Presidential inaugural committee. Following the inaugural, I stayed on the staff of the inaugural until approximately April again.

In April of 1993, I started work for Steny Hoyer, a Member of Congress from Maryland. At the time, he was chair of the Democratic caucus and I served on his caucus staff. I worked there until December of 1993, at which time I joined the Democratic National Committee. I worked there until March of 1997 at which time I joined the Rouse Grocery Company as Vice President of External Affairs. That's my current position.

Question. Have you spoken with anyone other than your counsel about this deposition?

Answer. No.

Question. Have you reviewed any documents in preparation for this deposition?

Mr. PIERSON. I will tell you that yesterday he had an interview with the FBI at which time he was asked to examine documents which you may be interested in.

EXAMINATION BY MR. WILSON:

Question. Do you have any documents that are—DNC documents currently in your possession?

Answer. I do not.

Question. Did you leave all of your work-related materials in your—with your former place of employment?

Answer. I did.

Question. What documents did you review with the FBI?

Mr. PIERSON. He may not remember. I can perhaps help him. There was a memorandum in July 1995 by a Landroca Steel to Donald Fowler. There was a memorandum he wrote to a counsel at the DNC concerning Pauline Kanchanalak following 1996 election. Was there anything else?

The WITNESS. Staff list.

Mr. PIERSON. Oh, yes, they showed him a staff list of the DNC and asked him to indicate which ones were fund-raisers and which were not.

EXAMINATION BY MR. WILSON:

Question. How did you come to work at the DNC?

Answer. At which time period?

Question. In your final—your final stint at the DNC as a paid employee?

Answer. I had worked with a few of the staff members of the DNC during the '92 campaign. When I went to work with Mr. Hoyer, I stayed in touch with them. Around December of 1993, a little bit earlier, a friend of mine, Laura Hartigan, became finance director and at that time asked me to rejoin with her at the staff of the DNC. I accepted her offer in the beginning of December of 1993.

Question. Did you interview with anybody for that position?

Answer. I interviewed with Laura Hartigan and David Wilhelm who at that time was Chairman of the Democratic National Committee.

Question. And referring, and I'll try and be specific, but I'm referring to your final employment at the DNC, what was your title?

Answer. For most of the time, I was director of the Trustee Program. Or director of large donor efforts.

Question. Did you have any other titles?

Answer. No.

Question. Who did you report to?

Answer. When I first started at the DNC, I reported to Laura Hartigan. Following the spring of 1995, there was a transition, and the new finance director was Richard Sullivan, who I reported to until I left.

Question. Could you provide a general description of your office? And by that I mean were there other individuals who worked with you in your capacity as——

Answer. There were two people under my direction. When I first started, they were Jennifer Scully and Jay Webber. The following time, Mr. Webber left, and a gentleman named Mack Gobush, G-O-B-U-S-H, joined the staff. Following some time, there was another transition in the spring of '95, an Anne Braziel and Nancy Burk joined the staff with me.

Question. In a spatial sense, where were they located in relation to where you worked? Were you all in the same office?

Answer. I'll refer to the last part of my year and a half.

Question. Okay.

Answer. Ms. Braziel and I shared an office. And Ms. Burk was stationed at a cubicle within approximately 12 feet of our office.

Question. Did you type your own letters and memoranda?

Answer. For the most part, I did. However, at times, I was assisted by both Ms. Braziel and Ms. Burk in some of the memoranda and letters that were sent under my name.

Question. Did you fax your own fax transmissions to other people?

Answer. Same, the previous answer. I did most of it. But they also assisted.

Question. Did you have someone who would take messages for you from the telephone?

Answer. I did not. We had a voice mail system.

Question. Did you use an e-mail system at the DNC?

Answer. It was available. I was not a frequent user of it.

Question. Did you have any—and, again, I'll just refer to the period during which you were the—the director of the Trustee Program. Did you have any official contact with White House employees?

Answer. What do you mean by official?

Question. Business-related contacts, where you would discuss matters with them or they would discuss matters with you?

Answer. Yes, I did.

Question. Was there a specific liaison in the White House to deal with you in your office?

Answer. There was not.

Question. Were there—was there any one person or were there any select number of people that you would deal with regularly?

Answer. I dealt for some time with Brian Bailey, with a woman named Tracy LeBreque, with a gentleman named Donald Dunn. Those were my primary contacts.

Question. Do you recall any dealings with other employees at the White House?

Answer. I mean,—I mean, for instance——

Mr. PIERSON. Are you asking about any contact or regular contact?

Mr. WILSON. Regular contacts.

The WITNESS. I mean I was friendly with a number of people through my work on the campaign. As far as business-related matters, the majority of my contacts are with the people I stated already.

EXAMINATION BY MR. WILSON:

Question. Did you ever attend regularly scheduled events at the White House?

Answer. Events meaning meetings or——

Question. Well, I'm trying to eliminate a random event that might be a Christmas party or a single type event, but a weekly scheduled event or a monthly type scheduled event, something that would occur on a regular basis?

Answer. For a time, Mr. Bailey arranged for meetings that included and arranged political staff representatives, congressional liaison staff representatives. The point of the meeting was to gather lists of names for upcoming social events that may take place at the White House.

Question. How frequently did such meetings occur?

Answer. They were scheduled, I believe, to take place every other week. Invariably, my meetings were canceled pretty often, and they did not run—I believe this program did not run more than 6 months.

Question. Did you have a pass to allow you access to the White House?

Answer. Never did.

Question. How did you gain access to the White House?

Answer. I was usually cleared through Mr. Bailey's office.

Question. And how would that process work?

Answer. After I was notified of a meeting, someone from his office would call and request my date of birth and Social Security number. They would tell me the time to enter and which gate of the White House to enter. I would present ID when I'd enter and be directed to the room where the meeting would take place.

Question. Please provide an overview of the Trustee Program at the DNC.

Answer. Trustee Program was a group of the highest donors to the Democratic Party or highest fund-raisers. The—there were two levels within the Trustee Program. There were trustees who contributed $50,000 or raised over 100,000. And managing trustees who contributed 100,000 and raised over 250,000. The program consisted of, by the time the '96 election, approximately 800 people from across the country.

Question. Did individuals who were members of the Trustee Program receive regular materials from the DNC? By that, I mean mailings and the sort?

Answer. We had a tally or sometimes every other day fax service with talking points regarding pertinent political issues. When we knew of—ahead of time of scheduled events such as the national galla in Washington, they received the date of that event as far ahead of time as we could provide it so that they knew of an invitation to that event.

Question. The daily faxes that you just referenced, who was responsible for sending the fax transmissions?

Answer. I believe they were written in the Research Department. And I don't know the process by which they were then faxed. But it was on a massive scale to not just trustees, but all financial supporters as well as political supporters and constituents.

Question. Who was the individual or who were the individuals who composed the fax transmissions?

Answer. I would be speculating. I'm not sure who in the Research Department.

Question. Did you ever have occasion to discuss entries in the fax transmissions with people who would be authors of the fax transmissions?

Answer. I did not.

Question. Do you know who did?

Answer. I don't.

Question. Did you receive regular copies of the fax transmissions?

Answer. They were supposed to be provided regularly. I don't think I saw—I probably saw half of the transmissions that were sent.

Question. Do you recall whether you retained any of the faxes that went out to the trustees for your records?

Answer. No. I did not.

Question. No, you don't recall?

Answer. I did not retain them.

Question. While you were at the DNC in your position as Director of the Trustee Program, did you have any responsibility for any other programs or initiatives at the DNC?

Answer. The one other program I was involved with was an effort to raise money from the Jewish constituency. It had varying titles. One we used most frequently was Jewish Leadership Forum. It was not a scheduled or defined job description. It just was a general—part of a general effort to raise money within the Jewish community?

Question. Did you regularly receive requests from members of the Trustee Program to obtain assistance with various types of things that they would like to do with the White House? And I realize that's about as unspecific as you can possibly make a question. So I'm just trying to gather whether there was a type of system that you used when people would call you up and ask you to do something for them, if they did ask you to do something for them. And that could be a tour of the White House or something like that or—just starting with that, if people called you up and asked you for a tour or perhaps an opportunity to get a photograph. Did you have a regular procedure that you would follow to respond to that request?

Mr. PIERSON. Are you talking about trustees calling.

Mr. WILSON. Yes.

The WITNESS. Well, let's take them—as far as tours, we tried to accommodate. Nancy Burk, Ms. Burk was the woman in my office who handled, who contacted the White House, receiving an allotment of some of the tickets which the White House provided the DNC to our trustees to have ticketed tours of the White House. Ms.—If—when you say photograph, you mean just a still photo of the President?

EXAMINATION BY MR. WILSON:

Question. Yes.

Answer. If it's just a still picture, again, I would probably ask Ms. Burk to retrieve one from the file and address a letter, an envelope to the requester.

Question. Did you—did you have a system to handle requests? And by that, I mean, did you use forms to track a request that would come in, a form would go out to a particular individual, or would it be fair to say that you responded to requests of you on an ad hoc basis?

Answer. Ad hoc basis.

Question. Did you have a system in place to determine whether it was appropriate to help an individual with a request that might be made of you?

Mr. LU. I'm not sure I understand the word, "appropriate." But if you do, please answer it.

Mr. PIERSON. I also have an objection. Is the "you" directed to him or is it directed to the entire DNC?

Mr. WILSON. To Mr. Swiller.

Mr. PIERSON. Did he personally have a system?

Mr. WILSON. Personally. Just was there a fail-safe mechanism system that you had in place to screen and determine whether it was appropriate to assist somebody with a request that they might make of you.

Mr. PIERSON. He's asking about you personally.

The WITNESS. No.

EXAMINATION BY MR. WILSON:

Question. Was there a DNC system that you would follow to determine whether it was appropriate to assist anybody with the request?

Answer. No.

Question. Were there ever occasions in which an individual might call you and ask—asking for you to help with something, and you were uncomfortable with providing assistance to them?

Answer. Yes.

Question. If you could, please describe those situations.

Mr. PIERSON. Try and give some examples.

The WITNESS. Frequently,—not frequently. That's overstating it. A few times, people would request to speak directly with the President, the Vice President, even members—most senior staff members at the White House, and ask for my assistance in providing those meetings. I always felt those requests were inappropriate and do not recall ever acting on one of them.

EXAMINATION BY MR. WILSON:

Question. Do you have any examples or do you recall any situations where an individual made a request of you and you were concerned about following up on that request because of something you knew about that person?

Answer. I don't know if I understand the second part of your question. You mean something I knew in their past?

Question. Yes, pre-existing knowledge of something that they had done or place that they had been or position that they had held which made you uncomfortable with continuing to assist them or assisting them in the first place.

Answer. I generally acted that if I felt uncomfortable with a request, I didn't do it, regardless of whether it was something in their background or if their request was, I felt, inappropriate, I didn't act on that.

Question. Trying to move away from situations where people were asking you things that you found to simply not be possible or request that you felt was just not something that could be realized, do you recall any situations where an individual made a request of you and you thought that you or the DNC did not want to be involved with helping that individual?

Mr. LU. Because of their past?

Mr. WILSON. Because of anything.

Mr. LU. Because of anything.

Mr. WILSON. Anything that you knew or have knowledge of.

The WITNESS. Could you restate the question? I'm sorry.

Mr. WILSON. I'll ask the reporter to read it, if I may.

[The reporter read back as requested.]

The WITNESS. Could you possibly restate that?

Mr. WILSON. Well, I'm not trying to be hard here. If you thought simply this is a person I don't think we should be involved with, and either you decided not to help or you discussed with somebody else whether that person should be assisted.

The WITNESS. I don't recall anyone that I flatly denied assistance.

EXAMINATION BY MR. WILSON:

Question. Did you ever talk to any colleague at the DNC about an individual and about whether it was appropriate to provide assistance to them?

Answer. I don't recall any specific conversations.

Question. Did you ever personally do any background checks on individuals who you came in contact with in your position as the director of the Trustee Program?

Answer. I do not personally, no.

Question. Did you ever request that anybody at the DNC to provide background information on the people that you came into contact with at the DNC?

Answer. Yes.

Question. Who would you make such requests of?

Answer. I tended to work with the Research Department at the DNC, different individuals who had access to Nexis-Lexis within their department.

Question. Do you recall the names of individuals you worked with?

Answer. I don't. Oh, that I worked with?

Question. At the DNC. On this matter of getting background information?

Answer. A name that I recall is Tom Janenda was the Deputy Research Director.

Question. Do you recall any other individuals that you might have made background requests for background information?

Answer. He was my primary contact. That I recall.

Question. Did you ever have anybody in your immediate office, the individuals you described previously as working with you, did you ever ask them to do any background checks on individuals?

Answer. I did not.

Question. Did you keep files of biographical information on individuals who were members of the Trustee Program?

Answer. I did.

Question. And—and what form did you keep that information in?

Answer. It was in a file cabinet, each donor member of the Trustee Program had a file with their name. And as many cases as we had a bio, a bio accompanied the file.

Question. So is it fair to say that if there were approximately 800 individuals who participated in the Trustee Program, that there were approximately 800 files on the individuals?

Answer. Approximately, yeah. But not all of them had bios. We may have had an empty file.

Question. What types of information would you keep in the file?

Answer. Bio information. If they had been sent a photograph or some other letter inviting them to an event, we may keep a copy on file. And in some cases, not in all, we—if they were trustees because of a donation, we kept a copy of the check and the check-tracking form in the file.

Question. Do you recall any other types of information that was kept in the files?

Answer. That was primarily it.

Question. How would you obtain the biographical information?

Answer. We would request it directly from the office or from—from the office of the individual for the—from the individual, him or herself.

Question. Did you have a standard form that you would send to them to fill out?

Answer. I believe Ms. Braziel designed a form that also requested that they provide us with their date of birth, Social Security number, as well as their address, home address, business address, telephone numbers, spouse's name, et cetera.

Question. How did you keep track of the individuals who were participants in the Trustee Program?

Answer. We had a computer data base system?

Question. What—did this data base produce an aggregate list of trustees that was—that you had access to?

Answer. It could, uh-huh. Yes.

Question. Did you keep such lists?

Answer. I did.

Question. Were these lists updated on a regular basis or were they just lists that if you had a need for them, you would request a new list to be generated?

Answer. Generally, I received a list when I requested it. There was not a scheduled updating.

Question. Were there any lists generated by the data base you described or in any other way that described the aggregate amount of contributions that come, that had come from the Trustee Program?

Answer. I'm not sure if I understand.

Question. Just whether at any particular time during the year, could you get a printout or a list that said—that told you this year, X amount of dollars have been raised through the Trustee Program?

Answer. No, I did not.

Question. Did you ever create such a list yourself based on numbers of participating trustees?

Answer. I may have tried to create lists broken down by contribution and then the sum of their contribution. But contributions were not made directly to the program in many cases. They were made in conjunction with an event, a fund-raising event anywhere in the country. But if someone had raised the necessary funds to become a member or contributed the necessary funds, they became a member, whether or not it was a direct to joining the program.

Question. Is it fair to say, then, that if somebody that made a contribution, that it was of the requisite amount, $50,000, for example, for the Trustee Program to attend a dinner, a fund-raiser, that they would then become a member of the Trustee Program?

Answer. Uh-huh. That's correct.

Question. And how did—how did you keep track of those types of transactions? How did you know whether people would become eligible to be a member of the Trustee Program or not?

Answer. I mean, it varied case to case. Some individuals sent their contributions directly to me or a list of what contributions they had raised. And I had direct contact. In cases where events were held around the country, individual fund-raisers were responsible for that event. Following the event would provide me a list of new members or people who had renewed their membership through the event which they had just coordinated. Those are the primary ones.

Question. Did you circulate among other offices at the DNC the list of trustees?

Answer. On occasion, the chairman's office would request a list. Other than that, the lists were in the Finance Department. No one else requested them.

Question. Did you ever send a trustee list to the White House?

Answer. No.

Question. There's a term of art that I've seen on documents, and it's the fund-raiser account. Do you know what that refers to?

Answer. I don't.

Question. You mentioned earlier that there was a computer system that kept track of the managing trustee lists. Was that the AS–400 system?

Answer. The AS–400 system was a system at the DNC. Within the Trustee Department, we had a separate data base that was more flexible to our needs of generating labels and quick lists that we used. It was a Paradox-based data system.

Question. Did you receive regular information from the AS–400 system?

Answer. I used it to reference—it was a good reference for when contributions were put in, because all contributions were posted in the AS–400. So I had access to it from the main frame at my desk. So frequently, I would access information off it.

Question. Were printouts of contributions generated by the AS–400 system the source of information that you used to determine who had contributed money and who would be eligible to be in the Trustee Program?

Answer. At times, yes. It was a source of information for that, yes.

Question. If you could, just describe what would happen if you had dealt directly with somebody and discussed making a contribution, and they hadn't made a contribution, sent you a contribution——

Answer. And they hadn't——

Question. And they had sent you a contribution. What would you do to ensure that that was entered into the AS–400 system?

Answer. I actually had no direct connection to the entries into the AS–400. My only assurance was I'd give approximately a week's time from when I had received the check—from the time from when I submitted the check, and checking the AS–400 was my only safety net in making sure. And I don't recall situations where checks did not appear after a week or maybe in some cases 2 weeks, but——

Question. When a check, and this is assuming first of all, did you receive checks directly from donors?

Answer. I did.

Question. When you did receive such a check, what was the mechanical process of handling that check? What would you do with that?

Answer. We—I would attach a donor information sheet check tracking form and add with it their name, company, phone number, which event the contribution related to, or was it part of their membership to the Trustee Program as indicated on the sheet. Then photocopied batch checks if I had more than one, and submit them to—I don't know the title, but the person within our—the Finance Department who maintained the list of what checks had come in.

Question. Who was that person?

Answer. The last person serving that was a woman named Theresa Stirk.

Question. And do you recall who was in a similar position before that?

Answer. During my time there were two other people that held it. First, it was a gentleman, Jeff King. And Susan Ochs, O-C-H-S.

Question. Did you ever receive lists of individuals generated in or by the White House?

Mr. PIERSON. Any kind of lists? Just a list that came from the White House.

Mr. WILSON. [Indicating in the affirmative.]

The WITNESS. Yes.

EXAMINATION BY MR. WILSON:

Question. What types of lists did you receive?

Answer. On occasion, they would submit to us a list of individuals who might be attending an upcoming White House event.

Question. And why would you receive such information?

Mr. PIERSON. If you know.

The WITNESS. In some occasions, we provided some names to be included in events they submitted since they were responsible for invitations and receiving regrets. They would provide a list identifying who was coming.

EXAMINATION BY MR. WILSON:

Question. Do you recall receiving any other types of lists from the White House?

Answer. I do not.

Question. Did you ever receive any lists of individuals who were suggested individuals to approach to ask for donations——

Mr. PIERSON. From the White House.

Mr. WILSON. From the White House.

The WITNESS. No, I did not.

EXAMINATION BY MR. WILSON:

Question. Do you know what the system at the DNC is now for screening campaign contributors, people who have contributed——

Answer. Today, I do not.

Question. Okay. Prior to November of 1996, did—do you know at the time what the system was for screening contributions?

Mr. PIERSON. Are you talking appropriateness or legality?
Mr. WILSON. Well either, actually.
Mr. PIERSON. Well, you probably ought to take them one by one.
Mr. WILSON. Well, we will then.

EXAMINATION BY MR. WILSON:

Question. Appropriateness screening for appropriateness?
Answer. Extended to our own discretion to decide on whether we're comfortable with a person's contribution. When I say our, I mean the individual fund-raiser dealing with that contribution.
Question. And staying on the issue of appropriateness in terms of screening contributions, do you recall examples or situations where it was determined—where you had discussions with people about the appropriateness of a—of a contribution?
Answer. I may have at times conferred with the—Mr. Sullivan or Marvin Rosen, the finance chair. But it was very infrequent.
Question. And do you remember the subjects of those inquiries?
Answer. Sometimes, there—if individuals were making a contribution that we needed—I'm trying to think. We needed more information on the individual or the corporation giving the contribution to make sure that it was a U.S. subsidiary.
Mr. WILSON. Excuse me, this is a reinforcement reporter.
The WITNESS. Oh.

EXAMINATION BY MR. WILSON:

Question. Do you recall any individual contributors that were discussed during these meetings with Mr. Sullivan?
Mr. PIERSON. Are you talking about natural persons or just specific instances.
Mr. WILSON. Natural persons, yes.
The WITNESS. I don't recall specific conversations about individuals or any individuals.

EXAMINATION BY MR. WILSON:

Question. Turning to legality, what was the system for screening contributions for legality of contribution?
Answer. I'm not sure what it was. I'm not an attorney. I don't know what the process was.
Question. Did you ever have any training during which legality of contributions was discussed?
Answer. I did.
Question. And with whom? Who conducted this training?
Answer. The general counsel and the deputy counsel, Joseph Sandler and Neal Rieff.
Question. Do you recall any instances where a Lexis-Nexis search was done to determine background information to assess either the legality or appropriateness of the contribution?
Mr. LU. By anyone—I'm sorry.
Mr. PIERSON. Let's break it down. Ask about Lexis-Nexis.
Mr. WILSON. Stay with one.
Mr. PIERSON. Search before you ask other purpose. Because you'll get a complicated or nonresponsive answer.
Mr. WILSON. Okay.

EXAMINATION BY MR. WILSON:

Question. I know you did mention before that there had been Lexis-Nexis searches. Did you ever request any Lexis-Nexis searches to be performed to supplement information that would be transmitted on the check-tracking forms that you filled out?
Answer. Not that I recall.
Question. Did you request Lexis-Nexis searches for any other purposes?
Answer. I remember a few occasions requesting the context being a person was going to be attending an event at the White House. And required more biographical information on the individual.
Question. Do you remember the individuals that you requested searches about?
Answer. I don't.
Question. Do you know whether at any time the DNC stopped performing Lexis-Nexis searches to determine the legality of campaign contributions?

Answer. I don't recall starting points. I don't recall an ending point. I don't recall there being a program of it.

Question. But do you know whether at any time such searches were stopped?

Answer. I do not.

Question. I provide the witness with a document that was a single page of handwritten notes, and it is marked DNC 3049787.

Just requiring you to read the whole thing, do you recognize the handwriting on this document?

Answer. I do not.

Mr. PIERSON. Are we going to mark this for the records?

Mr. WILSON. No, actually we will not. What I can do is two things, actually. I will defer to what is convenient for you. Documents that I show the witness that become immediately apparent have no relevance to his testimony, I can simply move on from, or else I can include them in the record if it is a convenience to you when you go back and review the record.

Mr. PIERSON. I don't think the record will be complete unless you do include it, because you have testimony about it. If the record says, there is a question, do you recognize the handwriting, there won't be any indication of what handwriting he was looking at, unless you include it. So you should.

Mr. WILSON. I am perfectly willing to do that. I will mark this document Exhibit AS–1 for inclusion in the record.

[Swiller Deposition Exhibit No. AS–1 was marked for identification.]

[Note.—All exhibits referred to can be found at end of deposition.]

Mr. WILSON. Just by way of background, we actually keep the documents. We don't let you take them.

Mr. PIERSON. The Senate lets us have them.

Mr. WILSON. Sorry. We are less accommodating on that front.

Mr. PIERSON. So am I.

EXAMINATION BY MR. WILSON:

Question. Are you familiar with FEC reporting requirements that apply to the DNC?

Answer. I am familiar with general requirements, yes.

Question. What reporting requirements applied to you in what you were doing as director of the Trustee Program?

Answer. I don't recall direct requirements. What I recall is that information such as occupation, employer of an individual, their address, the phone number and fax number, were required information for all contributions made, or if it was a corporation, the corporation's address, and that that was required for every individual that would then be submitted by the DNC to the FEC. So my requirement in relation to the FEC, as I recall it, was providing complete information on contributions.

Question. Apart from filling out check tracking forms, as you have described it previously, did you have to do anything else to ensure compliance with FEC provisions?

Mr. PIERSON. You are asking him——

Mr. WILSON. That you know of, that had been communicated to him.

Mr. PIERSON. As his responsibility? Witness will correct.

The WITNESS. Not that I recall, no.

EXAMINATION BY MR. WILSON:

Question. Did you have to produce any reports that you knew were going to be used for the purposes of FEC filing?

Answer. Other than the tracking form, nothing else was required that I recall.

Question. Are you aware that the accounting firm of Ernst & Young prepared materials that discussed contributions by individuals during the 1996 election cycle?

Answer. My only—and this is very second and thirdhand knowledge of Ernst & Young's connection with the DNC, is that they, after there were concerns about some donations, they reviewed those as an accounting firm following the '96 election. That is the only knowledge I have of any work they did with the Democratic National Committee.

Question. Did you ever meet with any Ernst & Young personnel while you were an employee at the DNC?

Answer. I had a contact there who was a contributor, but not in the context of your earlier stated question.

Question. Not in the context of the report or the materials prepared by Ernst & Young?

Answer. Correct.

Question. Were you ever contacted by any Ernst & Young employee in regard to the work that they were doing vis-a-vis the '96 campaign contributions?

Answer. Never.

Question. Were you ever—did you ever discuss with any of your colleagues the work that Ernst & Young was doing?

Answer. Yes.

Question. Were you ever asked to provide anything for the Ernst & Young report?

Answer. Never.

Question. Can you just generally recount the discussions you had with colleagues about the Ernst & Young process?

Answer. We, the colleagues I tended to discuss it with were within the finance department that I worked with. My discussion, the context, we were discouraged at how they were proceeding with their report. We felt that it was detrimental to the DNC, it was offending donors who were contacted, and I believe at the time some of our Asian American donors felt that they were being harassed by some of the Ernst & Young employees who were proceeding with that, and it was, you know, to our dismay.

Question. Was this your belief?

Answer. Being I had no direct contact, I had no notion, but, you know, after hearing that there were donors who were upset, then became my belief, sure. Yes.

Question. Do you know if individuals communicated that to Ernst & Young personnel?

Mr. LU. You mean donors themselves, or do you mean people at the DNC?

Mr. WILSON. People at the DNC.

Mr. PIERSON. Time out. What is the "that" we are talking about? The last thing we testified to is his feeling.

Mr. WILSON. That is quite right.

EXAMINATION BY MR. WILSON:

Question. Do you know if DNC personnel communicated to Ernst & Young personnel that there was a sense of dissatisfaction with the way the process was proceeding?

Answer. I have no knowledge of that.

Question. Did you ever participate in any discussions during which it was discussed the threshold of contribution that Ernst & Young reviewed during their review process?

Mr. LU. First of all, do you mean a monetary threshold?

Mr. WILSON. Dollar amount.

The WITNESS. I was not in formal discussions. I think informally, again, all the information we received was secondhand on their inquiries, and I believe we thought it was somewhere either over 5,000 or over 10,000. But I don't ever remember having direct knowledge of what the threshold was. But there was discussion of how they were proceeding.

EXAMINATION BY MR. WILSON:

Question. Do you know who set the level of monetary contribution that would be examined?

Answer. I don't.

Question. Aside from what you might have learned subsequently in media accounts, at the time did you know that—at the time, I am speaking of any time you were employed at the DNC, sort of in your knowledge of what people were telling you among your colleagues, did you know that checks were recommended to be returned?

Answer. Yes.

Question. Do you know whether the DNC returned all checks that Ernst & Young had recommended be returned?

Answer. I am not privy to that. No, I don't know that information.

Question. Did you have any discussions with your colleagues about whether Ernst & Young was distinguishing between illegal contributions and contributions that were deemed inappropriate?

Answer. I don't recall that discussion, no.

Question. What was Scott Pastrick's position at the DNC?

Answer. He had an unpaid volunteer position of treasurer of the Democratic National Committee, which I believe began in the spring of '95.

Question. Do you know whether he signed FEC reports?
Answer. I have no knowledge of that.
Question. Were you aware of any discussions that——
Answer. May I go back to that?
Question. Certainly.
Answer. Scott at one point in a conversation with me made light of the fact that he was supposed to sign FEC reports, but I think there were reports that were passed on that he did not sign.
Question. Did he tell you why that was?
Answer. I don't remember that, the context of why it was.
Question. Did you have any conversations with other colleagues about whether Mr. Pastrick was signing or not signing FEC reports?
Answer. No.
Mr. PIERSON. Off the record.
[Discussion off the record.]

EXAMINATION BY MR. WILSON:

Question. Back on the record.
Have you ever met Mark Middleton?
Answer. I have.
Question. When did you first meet Mr. Middleton?
Answer. I first met Mr. Middleton in the course of the 1992 Presidential campaign. We both served on the fund-raising staff for the Clinton for President. My position was in the mid-Atlantic region. Mark was the director of fund-raising in the State of Arkansas. We probably first met either at a national event we did for fund-raisers here in Washington or June or at the convention in July.
Question. Do you know whether Mr. Middleton was affiliated with the DNC in 1996?
Answer. I believe he was not.
Question. Did Mr. Middleton, do you know whether he was asked to serve on the 1996 finance board of directors?
Answer. I believe he may have been.
Question. Do you know whether he actually did serve on the finance board of directors?
Answer. I don't believe so.
Question. Did you have any discussions with him about whether he would or would not serve on the '96 finance board of directors?
Answer. Not that I recall.
Question. Do you recall whether Mr. Middleton did any fund-raising for the DNC in the 1996 election cycle?
Answer. I recall that he was—when Truman Arnold served as finance chair, he and Mark, he and Mr. Middleton had a close association from Arkansas. Mr. Arnold asked Mr. Middleton to assist in some fund-raising efforts when Mr. Arnold was chairman. But I don't recall—what was the last part of the question?
Question. I think that is pretty responsive right there. Did Mr. Middleton assist in organizing any fund-raising events in the '96 election cycle?
Answer. Not that I know of.
Question. After Mr. Middleton left the White House, he formed a business called CommerceCorp. Did you ever visit Mr. Middleton in his business place?
Answer. I did not.
Question. Did Mr. Middleton ever contact you to request assistance on behalf of clients or associates of his?
Answer. No.
Question. Did anybody else from Mr. Middleton's office ever contact you to request assistance?
Answer. No.
Question. When Mr. Middleton worked at the White House, did Yusuf Khapra ever contact you to arrange for assistance on behalf of any matter brought to your attention?
Answer. Not that I recall.
Question. Do you know Yusuf Khapra?
Answer. Not well, but I know him, yes.
Question. When did you first meet him?
Answer. Sometime during my service at the DNC, I believe in 1994, during that year.
Question. Did he ever contact you for any reason?

Answer. My recollection is that he worked with Brian Bailey in setting up the meetings regarding—that I described earlier, and that was the context of our contact, was to invite me to the meetings and make me aware of them.

Question. Did you ever receive any contacts in 1995 to provide assistance to the Widjaja family?

Answer. The what?

Question. The Widjaja family. Did anybody ever contact you and mention the Widjaja family that you know of?

Answer. Not that I recall.

Question. I provide the witness with a document, a memorandum to Richard Sullivan and Mr. Swiller from Anne Braziel, marked DNC 1809003. Take just a moment to look through those.

This memorandum is undated, and it is the only copy that has been provided to us. Do you recall ever having received this memorandum?

Answer. It does not look familiar.

Question. Are you able to tell me the year, date of the memo?

Answer. I am not.

Question. The first sentence of the memorandum is that Mark Middleton spent some time with me and pledged to help in raising money.

Assuming that that is Anne Braziel he spent some time with, do you recall having any conversations with Anne Braziel about Middleton pledging to help raise money?

Answer. It sounds familiar.

Question. Do you recall whether he ever did provide any assistance in giving you names of potential donors to the DNC?

Answer. Not that I had direct contact on. But Mark, having previously assisted in fund-raising, we were, you know, requesting of him to help—I requested him to help from time to time on some additional efforts. Like when I described earlier, Mr. Arnold brought him in to assist.

Question. Do you recall having conversations with any DNC colleagues about Mr. Middleton providing names for telephone solicitations?

Answer. I don't remember those conversations, no.

Mr. WILSON. I will mark this document Exhibit AS–2 for the record.

[Swiller Deposition Exhibit No. AS–2 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. Did you ever have any conversations that involved the Sinar Mas delegation or Sinar Mas entity?

Answer. No.

Question. Do you know what Sinar Mas is?

Answer. No.

Question. Do you know whether Mark Middleton ever raised funds for the DNC or any political party outside of the United States?

Answer. This will help, maybe. I don't recall Mark ever raising money in the last 2 years I worked with him, meaning from when Mr. Arnold brought him. So globally I have no knowledge of him ever raising money.

Question. That does help. I can't take away quite as many as the last time, but that does help.

When did you first meet Charlie Trie?

Answer. Sometime after I rejoined the DNC in 1993. Sometime in 1994. I don't recall the first meeting.

Question. Do you remember who introduced you?

Answer. I don't. I very well may have introduced myself, being that I was the director of the trustee program. Mr. Trie was a member of the program, and I had not met him yet. I may have introduced myself or been introduced by someone. I don't remember the context.

Question. Do you remember when you first solicited a contribution from Mr. Trie?

Answer. I don't recall ever soliciting contributions from Mr. Trie.

Question. I show the witness a document which is marked Bates Number DNC 3078818, and the title is "DNC Finance Executive Summary."

Mr. PIERSON. For the record, Counsel, it shows an apparent date in the upper left-hand corner of 12–3–96.

EXAMINATION BY MR. WILSON:

Question. If you could, explain what the terms "solicitor" and "fund-raiser" mean in this, in the context of this document?

Answer. One of the areas we filled out in our AS400 sheet for assistance in tracking was a solicitor. If someone made the request of a donor to make a contribution

that was in the context of trustee, membership could be allocated by money raised. So this was an area that tracked that.

Fund-raiser was the contact or the individual person who received the check, filled out the form, and submitted it.

Question. Is it fair to say that if you received—if somebody transmitted a check to you and you filled out the tracking form, that you would generally be listed as the fund-raiser for that event?

Answer. For that event?

Question. The event being the filling out of the tracking form for the particular receipt of that check.

Answer. If I filled out a form, I put my name as the fund-raiser.

Question. Do you recall any conversations with Mr. Mays on the contributions given by Mr. Trie in 1994?

Answer. I don't.

Question. Do you know Richard Mays?

Answer. I do.

Question. When did you first meet Mr. Mays?

Answer. I believe I met him during the 1992 campaign cycle.

Question. The entry on this document indicates that—actually it doesn't indicate anything. It states, health care campaign.

Could you provide a little bit of explanation of what the health care campaign entry on this document means?

Mr. PIERSON. Counsel, for the record, it says 1994 health care campaign.

Mr. WILSON. Correct.

The WITNESS. We had different efforts constantly going for raising money. It could be a gala event that was upcoming, it would be, as this indicates, the health care campaign effort. If it was a topical effort at the time and the contribution wasn't made in direct correlation to an event, they would attribute it to the issue that we were raising money for at that time.

EXAMINATION BY MR. WILSON:

Question. Who would make the decision to allocate it to one area or another area?

Answer. It tended to be made either by the fund-raiser or the finance director.

Question. Do you recall in this example why the money contributed by Mr. Trie was allocated to the health care campaign in 1994?

Answer. I don't recall.

Question. Do you recall whether all funds that you received that were not designated to go to a particular source were allocated to the health care campaign in 1994?

Mr. PIERSON. Could you repeat the question again? I am sorry, I think there was a double part. Could you ask it again, please?

EXAMINATION BY MR. WILSON:

Question. Sure. Was all money that was not allocated to a certain—was not designated by the contributor to go to a certain account allocated to the health care campaign in 1994?

Answer. I don't know. I don't know that it was or was not.

Question. Do you recall the dates that contributions were accepted for the 1994 health care campaign account? Maybe instead of just being quite so obtuse, if you could just explain what the 1994 health care campaign was. Was that literally a separate account into which money would go?

Answer. I don't believe it was a separate account. I believe it was separate internal accounting, but I believe all the contributions were to the Democratic National Committee campaign—I mean Democratic National Committee bank accounts. I don't think there were separate accounts. I think internally, just for our accounting, we had separate designations.

Question. Is it fair to say the money wasn't segregated into one particular place? The check would be deposited into a general account?

Answer. That would be my understanding of it.

Question. Do you recall whether there ever were any separate designated accounts into which checks were deposited? And I am asking for at any time during your working at the DNC.

Answer. My knowledge of accounts were there was a DNC Federal account, DNC non-Federal account, corporate account, there may have been a PAC non-Federal account. But those are the different accounts I recall.

Question. Do you recall any specific issue accounts, for example, health care campaign or media fund purchases or anything?

Mr. PIERSON. You are talking about bank accounts or internal accounts?

Mr. WILSON. I am talking about bank accounts.

The WITNESS. As I stated earlier, my knowledge of accounts is what I laid out. This designation is not referring to a separate bank account, I don't think. My knowledge of seeing this is it was a separate internal account within the finance department for internal tracking. That would be my understanding of reading it today.

EXAMINATION BY MR. WILSON:

Question. On this format, the end of the lines, indicating contributions to the health care campaign, there are what appear to be codes. One is F–01 and the other is N–03. Do you know what those mean?

Answer. I don't know for certain, but my understanding would be that these were probably personal, as it says in the top right corner, individual contributions. So there is a $20,000 limit that an individual can give to a party in a year. So that was probably, then the "F" would mean the Federal account, and then the remaining money would be designated, I assume, non-Federal and would be put into a non-Federal account. That would be my read of it.

Question. Do you know what the numerals mean after the letters?

Answer. No.

Question. Do you know whether there was a system for providing codes of this sort with a meaning?

Answer. I know that you needed to designate Federal from non-Federal money. Other than that, I am not familiar with how accounting is done.

Question. Is this a number that you would have entered on the check tracking form?

Answer. No. It may have been required to enter in certain cases if it was a Federal or non-Federal contribution, but I never made these designations.

Mr. WILSON. I will mark this document Exhibit AS–3 for the record.

[Swiller Deposition Exhibit No. AS–3 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. What was the health care campaign?

Answer. As you may recall, the President had an initiative to reform health care. Internally, we thought that we may be able to, for lack of a better word, like spice up our fund-raising if we talked about a certain initiative that was going on that the committee was supporting. So the campaign fund then became sort of a reaction to that.

Mr. WILSON. If we could go off the record for just a moment.

[Brief Recess.]

EXAMINATION BY MR. WILSON:

Question. Back on the record.

I will show the witness a document which is marked DNC 3078820. The heading is DNC Finance Executive Summary, date 12–3–96.

Have you ever met Mr. Trie's wife, Mrs. Wang Mei Trie?

Answer. Not that I recall.

Question. Again, you are listed on this document as the fund-raiser for a contribution of $20,000 from Mrs. Trie. Did you have any contacts with her about this contribution?

Answer. Not that I recall.

Question. Do you know who the solicitor of this contribution was?

Answer. It is not listed here, and I don't recall the contribution or the transaction of it.

Mr. WILSON. I will mark this document Exhibit AS–4.

[Swiller Deposition Exhibit No. AS–4 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. Did you attend the June 22nd, 1994, Presidential gala, DNC gala?

Answer. Yes, I did.

Question. Did you contact Mr. Trie regarding a $100,000 contribution that he gave to the DNC in May of 1994?

Answer. I don't recall that contact, no.

Question. Do you recall discussing Mr. Trie's attendance at the 1994 gala?

Answer. No, I don't. Discussing——

Question. With Mr. Trie.

Answer. No, I don't.

Question. Do you recall having discussions with any of your colleagues about Mr. Trie's attendance at the gala in 1994?

Answer. I don't.

Question. Were you ever asked to provide a recommendation for Mr. Trie for an apartment that he was attempting to be the renter of at the Watergate?

Answer. I did not. I don't recall that. It doesn't sound familiar.

Question. Did you know that David Mercer and Susan Levine had been asked to provide a recommendation for Mr. Trie?

Answer. Not that I recall.

Question. Did you ever attend any events at Mr. Trie's apartment in the Watergate?

Answer. Never.

Question. Did you ever speak with Martha Shoffner regarding Mr. Trie's move to Washington?

Answer. I am not familiar with that individual.

Question. Have you ever met Martha Shoffner?

Answer. Not that I recall.

Question. Do you recall having any contacts with Mr. Trie in relation to the August 1994 Presidential birthday fund-raiser?

Answer. No, I do not.

Question. I would like to provide a document for the witness. It is marked DNC 1275756. It is a memorandum to Martha Shoffner from David Mercer. It does not have the witness' name on it. I would ask you to just take a moment to look through the content of this memo.

The memo discusses a meeting between Mr. Mercer and Mr. Trie in 1994. Did you attend this meeting?

Answer. Not that I recall, no.

Question. Did you ever attend any meetings with Mr. Trie in the accompaniment of Mr. Mercer?

Answer. Not that I recall.

Question. The memo refers to a number of events or subjects, and I just want to very quickly ask you a few questions about some of the referenced issues.

In the first paragraph, there is a reference to a meeting before Mr. Trie left for Beijing. Did you ever discuss with Mr. Trie any travels that he took?

Answer. Not that I recall.

Question. Were you aware in 1994 that Mr. Trie was planning to travel to Beijing?

Answer. Not that I recall, no.

Question. And the fourth paragraph of this memorandum discusses a request for a letter inviting Mr. Trie to serve on the finance board. Were you ever a participant in any discussions about Mr. Trie becoming a member of the finance board at the DNC?

Answer. I was in discussions on the finance board as it relates to Mr. Trie. Individually, I don't have a specific recollection of specific conversations regarding it.

Question. Who was in charge of determining who would be on the finance board of directors?

Answer. It was a collective effort of DNC staff.

Question. And who were the staff?

Answer. It would be Ms. Hardigan, Richard Sullivan, David Mercer, Erica Payne, Peter O'Keefe. Any of the fund-raising staff, up to 20 individuals.

Question. Were you involved in that process?

Answer. Yes, I was.

Question. Were there any prerequisites for becoming a member of the finance board of directors?

Answer. There weren't prerequisites, but we were going to ask members to see if they could raise above the limit—not limit, above the threshold for the trustee program; we were going to ask them to raise I believe it was $350,000 in a year.

Question. Do you know whether Mr. Trie made a request to be put on the finance board of directors?

Answer. I don't recall that. It was not made to me, but there was a request made.

Question. The fifth paragraph of this memorandum discusses a mission to China, and it refers to a Commerce Department mission to China which was to commence on August 27th, 1994.

Did you have any discussions with Mr. Trie about his participating in this Commerce Department mission to China?

Answer. Not that I recall, no.

Question. Did you know at the time that there was going to be a Commerce Department mission to China?

Answer. I know there has been one. I don't recall when I became aware of it.

Question. Do you recall any conversations or discussions about this particular Commerce Department mission to China?

Answer. No, I don't.

Question. Do you recall whether you made any telephone conversations on behalf of Mr. Trie about this trade mission to China?

Answer. Not that I——

Mr. PIERSON. Made or had?

Mr. WILSON. Made.

Mr. PIERSON. Telephone calls on behalf of Mr. Trie?

Mr. WILSON. Yes.

The WITNESS. Not that I recall, no.

EXAMINATION BY MR. WILSON:

Question. Were you involved in any conversations by telephone or in person during which Mr. Trie's interest in any type of trade mission or foreign trip with American governmental employees was discussed?

Answer. Not that I recall.

Question. Did you ever discuss Mr. Trie's financial contributions with anybody at the White House?

Answer. Not that I recall, no.

Mr. WILSON. Just to back up for a moment, I will mark the document we are discussing, Exhibit AS–5, for inclusion in the record.

[Swiller Deposition Exhibit No. AS–5 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. Have you ever met an individual named Ng Lap Seng, also known as Mr. Wu?

Answer. No, not that I recall.

Question. Have you ever had any telephone conversations with Mr. Ng Lap Seng?

Answer. No, I have not.

Question. Do you recall whether Mr. Trie was ever invited to become a member of the finance board of directors?

Answer. I believe he was. My recollection is he was.

Question. Do you know an individual named Ernest Green?

Answer. I do.

Question. When did you meet him first?

Answer. I believe I met him upon my return to the DNC, subsequent to that, sometime in 1994.

Question. Do you know Jude Kearney?

Answer. I am sorry?

Question. Do you know Jude Kearney, K-E-A-R-N-E-Y?

Answer. I know him, yes.

Question. Have you met Mr. Kearney in person?

Answer. Yes, I have.

Question. And where have you met him?

Answer. In the '92 cycle, as I stated earlier, I was a fund-raiser in the mid-Atlantic region. At that time Mr. Kearney was based in D.C., and I believe I met him in events and he assisted in some fund-raising efforts.

Question. Did Mr. Kearney, after you first met him in, I believe you said 1992, did he obtain a job with the government in Washington?

Answer. That is my recollection, that he did.

Question. Do you know where he was working after 1992?

Answer. I believe it was either the Commerce Department or at the Treasury Department.

Question. Did you attend a breakfast with Mr. Green, Mr. Kearney, Mr. Trie, and Mr. Ng Lap Seng in October of 1994 at the Hay-Adams Hotel?

Answer. Not that I recall, no.

Question. Do you know Allen Weinstein?

Answer. The name is not familiar.

Mr. LU. Was that Allen or Ellen?

Mr. WILSON. Allen.

EXAMINATION BY MR. WILSON:

Question. Do you know Nancy Jacobson?

Answer. Yes, I do.

Question. Who is Ms. Jacobson?

Answer. She was my supervisor in 1992 when I worked on the Clinton campaign. She was again the finance director of the Inaugural Committee when I served as the deputy finance committee. We stayed friendly while I lived in Washington, but I have not spoken to her since approximately 6 months or longer.

EXAMINATION BY MR. WILSON:

Question. Do you know where she works?

Answer. My last knowledge of her employment was that she was employed individually, working for herself on a contract basis.

Question. Does she have a connection with an organization called Center for Democracy?

Answer. Not that I'm aware of. Not that I know of.

Question. Do you know of an organization called Center for Democracy?

Answer. It's a familiar name, yes.

Question. Do you know what it does?

Answer. I do not.

Question. Have you ever discussed the activities of Center for Democracy with Mr. Trie?

Answer. Not that I recall.

Mr. PIERSON. Have you ever discussed contributions that Mr. Trie might or—might have made or might have been considering making to the Center for Democracy?

Answer. Not that I recall.

Question. Did you participate in setting up a meeting between Mr. Trie, Winston Bank and Chairman Fowler in 1995?

Answer. Not that I recall.

Question. Did you ever participate in any discussions with Mr. Trie about setting up a chapter of an organization called Democrats Abroad in Taiwan?

Answer. Not that I recall.

Question. Do you know of an organization called Democrats Abroad, based in Taiwan?

Answer. I know of an organization called Democrats Abroad, but not one based in Taiwan, no.

Question. What is Democrats Abroad?

Answer. Just that. It's registered Democrats who are abroad for work in countries throughout the world.

Question. Is it an organization that's independent of the DNC?

Answer. That's my understanding, yes.

Question. Did you assist with organizing a fund-raiser in November of 1995 at the Car Barn in Washington, D.C.?

Answer. What was it?

Mr. PIERSON. November of 1995. November 8, 1995.

The WITNESS. Not that I recall.

EXAMINATION BY MR. WILSON:

Question. Did you ever have any discussions with Mr. Trie about an individual named Wang Jun, W A-N-G, J-U-N, attending a Presidential coffee?

Answer. Not that I recall, no.

Question. Have you ever had—have you ever met a Wang Jun?

Answer. I have not.

Question. Have you had any conversations with him?

Answer. I have not.

Question. Do you know who he is?

Answer. I don't.

Question. How many times do you recall being contacted by Mr. Trie or one of his representatives in 1995 and 1996?

Answer. I don't recall one contact.

Question. You don't recall any contacts at all?

Answer. That's correct, I don't recall any.

Question. Have you ever met an individual named Antonio Pan?

Answer. Not that I recall, no, the name is not familiar.

Question. Do you know whether Mr. Trie was ever invited to use the President's box at the Kennedy Center?

Answer. Not that I know.

Question. Just generally speaking, was Mr. Trie considered a member of the Trustee Program?

Answer. Yes. The time I was there, he was.

Question. And covering the entire time you were employed by the DNC, do you recollect, and this is personally, any interaction with Mr. Trie at all?

Answer. I saw Mr. Trie at some of our events. I think that was the limit of our interaction. He may have stopped by the DNC—he did stop by the DNC a few times where I would say hello, chat with him for a few minutes. But I was primarily not a major contact of his at the DNC, so I didn't have many conversations with him.

Question. Who did Mr. Trie contact at the DNC?

Answer. My recollection is that the majority of his contacts were, I believe, with Mr. Mercer.

Question. Do you know whether he had contacts with Mr. John Huang?

Answer. Whether who did?

Question. Mr. Trie.

Answer. I have no knowledge if he had contacts or not.

Question. Do you know of any situations in which Mr. Trie contacted any members of your staff?

Answer. Meaning Ms. Braziel, Ms. Burke?

Question. Correct.

Answer. Not that I recall, no.

Mr. WILSON. I'm providing the witness with a document which is marked F 0015575. It's dated, or at least there is a number at the top, 7–21. It says, "Notes for Ari."

EXAMINATION BY MR. WILSON:

Question. And if you would, there's an arrow pointing to an entry about halfway down the page?

Answer. Uh-huh.

Question. It's an arrow that was on the document as produced to us, and it says, "Charlie Trie has 4 SP and 2 WH," dash, dash, "is this right? I"—question mark. "I thought it was 4 total," question mark.

Do you know what this means?

Answer. My understanding what this document looks like is—it was regarding the events at the convention. Anne Braziel, myself, Nancy Burke worked in coordinating some of the hotel accommodations for trustees at the convention. Two of the hotels that we worked with were Sutton Place and the Whitehall Hotel in Chicago. So my read of this would be that, as it says, Charlie Trie has four Sutton Place rooms and two Whitehall rooms. Is that right? I thought he only had four rooms. That was her—this looks like a document that would have been put together by Ms. Braziel. She was sort of coordinating the hotel efforts hand on.

Question. Do you recall providing any assistance for Mr. Trie at the convention?

Answer. Not as an individual; provided assistance to trustees collectively. I don't recall specific assistance to Mr. Trie.

Question. Do you know whether he made any requests of you—of you?

Answer. Not that I have knowledge of that I recall, no.

Question. Did he make any requests of any of the people that you were working with at the convention?

Answer. Well, it looked, from this document, it looks like he made hotel requests, which we probably assisted him with. Other requests are not familiar to me.

Mr. WILSON. This document is marked Exhibit AS–6.

[Swiller Deposition Exhibit No. AS–6 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. Did Mr. Trie ever discuss his desire for appointment to a commission or board, a Federal commission or board, with you?

Answer. I don't recall any discussion about this.

Question. Do you know of any conversations in which Mr. Trie's name was brought up in conjunction to possible appointment in a commission or a board?

Answer. Not that I recall, no.

Question. Did you know that Mr. Trie was interested in being appointed to a Federal commission or board?

Answer. I think I've learned that information subsequent to the campaign in some of the news accounts of it, but not that I recall.

Question. Did you ever have any discussions about Mr. Trie with the White House Office of Presidential Personnel?

Answer. Not that I recall, no.

Question. Do you know whether either yourself or any individuals in your office were contacted by the White House Office of Presidential Personnel about Mr. Trie?

Answer. I don't recall any contacts, no.

Question. Do you know of anybody else at the DNC who was contacted about Mr. Trie by the White House Office of Presidential Personnel?

Answer. Not that I recall or have any knowledge of, no.

Question. Do you know of Mr. Trie ever making a contribution to the DNC before 1994? And I'm just asking you, when—I mean, the question really should be, do you recall when Mr. Trie first made a contribution to the DNC?

Answer. My recollection is that Mr. Trie was a member of the Trustee Program and returned to the DNC. Whether that was through contributions or funds raised, I don't recall.

Question. Have you ever met an individual named Tony Shsu, S-H-S-U?

Answer. Not that I recall, no.

Question. Have you ever heard of an organization called the Chy Corporation, C-H-Y Corporation?

Answer. No.

Question. Do you know Pauline Kanchanalak?

Answer. Yes, I do.

Question. When did you first meet Ms. Kanchanalak?

Answer. I believe I met her in the '92 campaign, somewhere when I was serving as a fund-raiser in the Mid-Atlantic region.

Question. Do you recall where you met her?

Answer. I don't recall the circumstances of meeting her. I know that she was involved with some of the events in some of the fund-raising we did in the D.C. metro area.

Question. Do you recall whether she was a contributor, a financial contributor, in 1992?

Answer. That would be my, in retrospect, reflection now, my understanding why I would have met her, because she was a contributor.

Question. Did Ms. Kanchanalak or her sister-in-law Mrs. Kronenberg or any of her employees ever contact you or anyone in your office while you were an employee at the DNC?

Answer. The second time or any time?

Question. Actually, let's—we'll break that down. The first time you were at the DNC, and I'll ask you——

Answer. I believe I had some contacts with her during the time. I don't recall the context of them. But she was an individual who we may have asked her to participate. I can't remember the contacts because I didn't do that year, but I don't know.

Question. And turning to the second stint, your second stint at the DNC, do you recall whether she or her sister-in-law or any of her employees contacted you?

Answer. I did have some contact with Pauline and with Ms. Kronenberg.

Question. And do you remember the context of any of those contacts?

Answer. I remember few. One was a request by Ms. Kanchanalak to attend a luncheon that the White House was hosting with the Queen of Thailand. She wanted to be—she requested me to assist her in being included in that event. I recall discussing with her an upcoming White House event which she was going to receive an invitation to. And I had a—my final contact with her was subsequent to the '96 election. She—we had a discussion about her contributions to the DNC at which time she inferred that they were not her contributions, but her mother-in-law's contributions.

Question. Do you recall whether you ever arranged for Ms. Kanchanalak to meet with administration officials?

Answer. Not that I recall, no.

Question. Was it ever brought to your attention that Ms. Kanchanalak had an interest in the Bureau of Labor Statistics and becoming somehow involved with the Bureau of Labor Statistics?

Answer. I don't recall that at all.

Question. Did you ever organize lunches for any DNC contributors at the White House Mess?

Answer. I was aware that some lunches were attended by donors, but I'm trying to recall when I participated in setting them up, and I don't.

Question. Do you have any recollection of—of Ms. Kanchanalak or Ms. Kronenberg attending a White House Mess luncheon?

Answer. Not that I recall, no.

Mr. WILSON. I provide the witness with a document which is marked F 0040590. It's a memorandum to Mr. Swiller from Georgie Kronenberg, dated May 11, 1995.

Mr. PIERSON. My I make a suggestion that we mark the exhibit when you first identify the document. That way we will have a number we can refer to.

Mr. WILSON. Certainly. I'll mark this exhibit as AS–7.

Mr. PIERSON. Thank you.

[Swiller Deposition Exhibit No. AS–7 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. The part that I'm particularly interested in is the postscript at the very end of the memoranda which states, "On a different matter, please let me know the amount to reimburse you for the luncheon at the White House Mess which Susan Lavine has kindly organized for us."

Mr. PIERSON. Have we established whether or not he's seen this before?

Mr. WILSON. I was just about to ask.

EXAMINATION BY MR. WILSON:

Question. Are you familiar with this document, that exhibit?

Answer. It's not familiar to me. But——

Question. Do you recognize there's a handwritten notation on the—towards the top of the first page that says, "File," and that's underlined?

Answer. Yes.

Question. Is that your handwriting?

Answer. It looks like it is, yes.

Question. Do you have any recollection of any discussions about Ms. Kronenberg providing reimbursement for a White House Mess lunch?

Answer. It—it's not familiar, no.

Question. Do you know how—how you would have resolved the request that is made in the postscript? Do you recall passing this along to somebody else's attention?

Answer. No, I don't.

Question. Did you ever have any involvement with people's reimbursements for White House mess lunches that you remember?

Answer. No, I don't.

Mr. WILSON. I have a document which is marked Exhibit AS–8, which is provided to the witness. It's a memorandum to the file. It's been premarked F 0018925. It's from Mr. Swiller, and it's regarding a conversation with Ms. Kanchanalak.

[Swiller Deposition Exhibit No. AS–8 was marked for identification.]

Mr. PIERSON. Can I see the last document, please, just for a moment?

Thank you. Sorry.

Mr. WILSON. Sure.

EXAMINATION BY MR. WILSON:

Question. The memo refers to a telephone conversation that you had with Ms. Kanchanalak on November 14, 1996. Do you know—assuming that the—the information contained is correct, did you, in fact, call Ms. Kanchanalak?

Answer. My recollection is she called me.

Question. And do you know why she called you?

Answer. Yeah. The context of this memo, she had received some calls about contributions that were being indicated that she had made to the Party. She indicated to a reporter that they were, indeed, not her contributions, but that of her mother-in-law. I guess that became an issue because in our FEC reports or in our internal reporting, it was reflected that the contributions were under Pauline's name and not Praitun's name, which I believe is the name of her mother-in-law. So this was then a conflict which was brought to the attention of our press department, brought to the attention of our counsel, and my conversation clearly states, you know, the context of it—this document states the context of the conversation.

Question. Do you know whether Ms. Kanchanalak called anybody else at the DNC before you to impart the information contained in this memo?

Answer. Not that I have knowledge of, no.

Question. Okay. Do you know whether she had any subsequent conversations with other DNC employees about the issues discussed in this memorandum?

Answer. Not that I know of, no.

Question. Do you know why she called you?

Answer. I believe she had tried to call a few people at the DNC, and some others may not have been available. And I doubt if I was available. And the fact that I had been one of the many contacts of the DNC, she called me as well.

Question. Prior to your telephone conversation on November 14th with Ms. Kanchanalak, were you under the impression that contributions that she had conveyed to you were made by her?

Answer. That was very clearly my understanding, yes, that the contributions she made were her contributions.

Question. Had she ever told you that the contributions were made by her?

Answer. I don't recall that as a topic of discussion in specific, no.

Question. Did Ms. Kanchanalak, during the discussion on November 14, make any reference to Ms. Kronenberg's contributions and the source of Ms. Kronenberg's contributions?

Answer. Not that I recall, no.

Question. Do you know whether the memo that we're reviewing now embodies all of the things that Ms. Kanchanalak and you discussed, or were there other matters that you discussed during the telephone conversation?

Answer. No, I believe this covers—the memorandum pretty well covers the conversation, yes.

Question. Did you ever, subsequent to your telephone conversation with Ms. Kanchanalak on November 14, '96, did you review her past contributions to the DNC?

Answer. Yes.

Question. Did you prepare a memorandum or any written work product that came from that review?

Answer. I don't recall written work product, no.

Question. Did you discuss this conversation with anybody else at the DNC?

Answer. Yes.

Question. And who did you talk with at the DNC about your November 14 conversation?

Mr. PIERSON. Counsel, the DNC is not represented here. You may be inquiring into frivolous conversations, and the privilege may be waived, but we're in a position where, if this—if you're asking about conversations with counsel for the DNC, I'm going to have to instruct the witness that he's going to have to decline to describe the content in order to reserve the privilege. It's not ours, but it's also not ours to waive.

Mr. WILSON. I understand.

Mr. PIERSON. So any conversations you had with any lawyer for the DNC about this subject, you can describe who you talked to and that this was the subject, but beyond that, we'll assert the privilege.

Okay. Can you answer the question?

The WITNESS. I had a conversation with the counsel.

EXAMINATION BY MR. WILSON:

Question. And the counsel is?

Answer. Joseph Sandler.

Question. Did you have any conversations with anybody else at the DNC about your conversation with Ms. Kanchanalak?

Answer. As I recall, I had conversation with Mr. Sullivan and Ms. Supina, S-U-P-I-N-A.

Question. In your conversations with Mr. Sullivan and Ms. Supina, did they indicate to you whether they were under the expression that Ms. Kanchanalak was making the contributions personally?

Answer. Yes, they were under the same impression I was, that her contributions were made personally.

Question. Now, subsequent to the conversation, you indicated that you did check into Ms. Kanchanalak's previous contribution history. Did you accumulate any materials at this time?

Answer. I recall reviewing some of the past check tracking forms that were attached to contributions she had made, yes.

Question. Did you create a file and put the information into a—into an individual file?

Answer. I don't recall the creation of a file. I recall reviewing the documents.

Question. The document we're reviewing now is—has a title which is "Memorandum to the File." Do you recall where it—where you put this document after you had drafted it?

Answer. I—my recollection is that I submitted it to our legal counsel.

Question. Did you keep a copy of this document for your own files?

Answer. I believe I may have, yes, as I said earlier, and it would have been in the files under "trustee donor," so I probably put it in the Kanchanalak file.

Question. Did you provide a copy of this document to anybody else at the DNC, apart from Mr. Sandler?

Answer. I may have—as I recall, I reviewed the document with Mr. Sullivan, but I don't recall providing him an individual copy.

Question. Did you transmit this document to anybody outside of the DNC, give it to anybody outside of the DNC?

Mr. PIERSON. Other than counsel?
The WITNESS. No.

EXAMINATION BY MR. WILSON:

Question. When you looked back over Ms. Kanchanalak's previous contribution history, did you come across any indication of the material that she communicated to you during your conversation on November 14th, any indication that she had communicated to anybody that she would not be making the contributions in her own name?
Answer. No, I did not.
Question. When—when Ms. Kanchanalak mentioned to you that she had made an arrangement with Mr. Riser during——
Mr. PIERSON. Raiser.
Mr. WILSON. Raiser. Thank you.

EXAMINATION BY MR. WILSON:

Question [continuing]. During the 1992 campaign, did she tell you whether this was communicated to anybody else at the time?
Answer. My recollection is that she indicated it was just a discussion between the two of them, and that was the limit of the communication.
Question. And do you know what position Mr. Raiser had in 1992?
Answer. Mr. Raiser was one of the two finance cochair's for the Clinton for President campaign. He was based in Washington, D.C.
Question. Now, you've indicated that you had discussions with Mr. Sandler about your telephone conversation from November 14th. What did you tell Mr. Sandler?
Mr. PIERSON. We have to assert the privilege. And it's—it's only because we're preserving it for the DNC. It's not our privilege to waive.
Mr. WILSON. So it's fair to assume that anything related to the context of Mr. Sandler will be covered by—you will assert privilege over it at this time?
Mr. PIERSON. Yes, on this topic.
Mr. WILSON. Sure.
Mr. PIERSON. And I should tell you that there are circumstances on the Senate side in which the DNC has waived the attorney/client privilege, but since I don't know what those are, and I don't know what the attitude towards the House side is——
Mr. WILSON. Right.
Mr. PIERSON.—I just have to preserve the privilege.
Mr. WILSON. Certainly.

EXAMINATION BY MR. WILSON:

Question. Have you had any subsequent conversations or conversations subsequent to November 14 of 1996 with Ms. Kanchanalak?
Answer. No, I have not.
Question. Do you know where she called from? The memo says Thailand, but do you know where in Thailand she called from?
Answer. No I don't.
Question. Did she indicate to you whether she intended to return to the United States at any time?
Answer. I don't recall that being part of the discussion.
Question. Did she discuss with you why she was in Thailand?
Answer. I don't recall that either.
Question. After the November 14 conversation, did you communicate the contents of the telephone conversation to Ernst & Young, the accounting firm conducting the background review of campaign contributions?
Answer. As I stated earlier, I don't recall having any contact whatsoever with any member of Ernst & Young.
Question. Do you know whether anybody else at the DNC communicated the contents of your telephone conversation with Ms. Kanchanalak to Ernst & Young?
Answer. Not that I have knowledge of.
Question. Did you discuss with Mr. Sullivan or Ms. Supina whether anybody should communicate the contents of your telephone conversation with Ms. Kanchanalak to Ernst & Young?
Answer. That was never part of a discussion as I recall.
Mr. PIERSON. Can I have just 2 minutes to talk to Minority counsel just outside in the hallway? It will take 2 minutes.
Mr. WILSON. Yes, if we can go off the record.
[Discussion off the record.]

[Brief recess.]

Mr. WILSON. Back on the record, please.

EXAMINATION BY MR. WILSON:

Question. Do you know John Huang?

Answer. Yes.

Question. When did you first meet Mr. Huang?

Answer. I believe I first met Mr. Huang during the 1992/93 Inaugural Committee, my service there.

Question. When did you first hear about Mr. Huang?

Answer. Probably prior to that, part of my responsibility is we're coordinating lists of the top fund-raisers and contributors for—across the country, for the finance department of the Inaugural Committee. I believe that's when I probably first ran across the name.

Question. Did you ever have any contacts with Mr. Huang while he was employed by LippoBank in California?

Answer. Not that I recall, no. Let me restate. I believe that my contacts with him during the Inaugural, my understanding is that he may still at that time have been an employee of the bank.

Question. Were—were those social contacts, or did you have any fund-raising contacts with him?

Answer. He assisted in a contribution that I believe came from the LippoBank or from him for part of the events going on during the Inaugural Committee, so—as far as fund-raising, that was the context of it.

Question. Did you speak with anybody regarding Mr. Huang's appointment to the—his position at the Commerce Department?

Answer. Not that I recall, no.

Question. Did you have any contacts with Mr. Huang while he was at the Commerce Department?

Answer. I don't recall the specific conversations, but I believe I did have a contact with him.

Question. Did he contact you this period?

Answer. I believe I made the initial outreach to Mr. Huang in the context of my returning to the DNC in '93, '94.

Question. And if you could describe in more detail the reason for your contacting him?

Answer. Mr.—My—there are two contacts. My recollection is that Mr. Huang had been a fund-raiser for the '92 campaign effort. I called him, I believe, to secure from him any names that I may then reach out to in the context of my position at the DNC, and also his wife was a contributor to the party at that time, but lived in California. So I may have made contacts to him in reference to his wife's participation with the party.

Question. Did you—have you ever communicated directly with Mr. Huang's wife?

Answer. I have met her. I've talked to her.

Question. Where have you met her?

Answer. I met her at functions in Washington, galas.

Question. Did you ever seek Mr. Huang's assistance in setting up meetings while he was at the Department of Commerce?

Answer. Not that I recall.

Question. Did you ever contact Mr. Huang about arranging for individuals' participation in trade missions while he was at the Department of Commerce?

Answer. Not that I recall.

Question. How did Mr. Huang come to be hired as a fund-raiser at the DNC?

Answer. I only know what I've learned in the last few months. I don't—didn't know the context then. So if you want me to reflect upon what I——

Question. If you would. What do you know now about Mr. Huang's coming to be hired as a fund-raiser at the DNC?

Mr. LU. And you want his recollection even if it's from news accounts?

Mr. WILSON. Well, I would like to know what he knows now, yeah.

Mr. LU. Okay.

The WITNESS. As I said, my recollection is what I've heard in the news, that Mr. Huang was brought to the attention of Mr. Sullivan by I believe it was Mr. Ickes or someone else that he was someone interested in assisting in fund-raising.

EXAMINATION BY MR. WILSON:

Question. Were you aware of—of Mr. Huang meeting with individuals at the DNC just prior to his being hired at the DNC as a fund-raiser?

Answer. No. I—not that I recall.

Question. Did you ever see him over at the DNC prior to his being offered the position as a fund-raiser of the DNC?

Answer. Not that I recall, no.

Question. Did Mr. Huang ever visit you at the DNC?

Answer. Prior——

Question. Prior to his becoming a member of the fund-raising staff?

Answer. Not that I recall, no.

Question. Did you ever visit Mr. Huang at the Department of Commerce?

Answer. No I did not.

Question. Did Mr. Huang ever speak with you about his becoming a member of the fund-raising staff at the DNC prior to his becoming a member of the fund-raising staff?

Answer. Not that I recall.

Question. When Mr. Huang was hired by the DNC, did you ever have discussions with him about fund-raising staff training?

Answer. He and I individually?

Question. Yes.

Answer. Not that I recall, no.

Question. Did you ever have any discussions with Mr. Huang about the law as it applies to fund-raising in political campaigns?

Answer. Not that I recall.

Question. Do you know whether he was given instructions on the law as it pertains to fund-raising and political campaigns?

Answer. I don't recall his specific tutoring of those laws. We, on a—maybe once a year, as a finance staff got together and briefed in a group. But I don't know of John receiving any specific individual instruction on the law.

Question. Do you recall ever—do you recall ever attending any seminars or instructional meetings about the law and campaign financing with Mr. Huang?

Answer. I don't recall if Mr. Huang was at any of them. My recollection would be that he would be, because the whole staff was invited to them. But Mr. Huang traveled a bit, so I don't know if he was at the ones which I attended.

Question. Did Mr. Huang ever seek your advice or counsel on any campaign contributions that he was soliciting?

Answer. No, he did not.

Question. Did he—did he ever discuss with you—did he ever discuss with you your fund-raising activities?

Answer. Not that I recall, no. He—but—I was being the director of the Trustee Program, he may have had individuals who he solicited contributions that made them trustees, then he would then provide myself with those names. That would sort of be the context.

Question. Aside from the transmission of the name and the check and basic information about the contributor, did you have any discussions with Mr. Huang about any individuals who were being solicited for campaign contributions?

Answer. No, not that I recall.

Question. Do you remember whether he ever sat down with you and had a conversation about what he was doing as a fund-raiser at the DNC?

Answer. I don't recall it.

Question. Do you recall whether you called him and asked him things about—how his job was going or what he was doing as fund-raiser for the DNC?

Answer. I don't recall that type of conversation.

Question. Is it—is it fair to characterize, then, your recollection is not having any contacts with Mr. Huang at all on any substantive issues while he was employed at the DNC?

Answer. We had social contacts, but substantive, that's correct.

Question. Do you know anything about Mr. Huang's compensation at the DNC?

Answer. Only what I've read subsequent to the campaign in the news.

Question. Prior to November of 1996, did you know anything about Mr. Huang's compensation?

Answer. I remember knowing that he was a compensated employee and wasn't in the position as a volunteer, but I didn't know the sum that he was being compensated.

Question. Did you know—did you know whether there was an agreement to supplement his compensation, depending on how much—how many contributions he raised?

Answer. I had no knowledge of that. If I had, I would have asked for it for myself.

Question. Were you ever involved with Mr. Huang in setting up fund-raising events?

Answer. The only context I can think of was when we worked—when the finance staff as a team worked on the large gala. He and I directly on one specific event, no, there was never an occasion with just the one of us.

Question. And that was the 1996 gala that you're referring to?

Answer. Yes.

Question. Were you aware of any controversy within the DNC regarding Mr. Huang's being involved in setting up events that included the President?

Answer. Not prior to November of '96.

Question. Did any of your DNC colleagues have discussions with you about Mr. Huang's job performance while he was a fund-raiser at the DNC?

Answer. Not that I recall, no.

Question. Did you ever have any communications with White House employees during which you discussed Mr. Huang's performance as a DNC fund-raiser?

Answer. No, I don't recall any.

Question. Did you have any conversations with any employees of other executive branch agencies during which you discussed Mr. Huang's fund-raising responsibilities?

Answer. No, not that I recall.

Question. Did Mr. Huang ever request you to provide him with lists of contacts in order for him to approach people to solicit donations?

Answer. I believe it—we may have discussed a list of California contributors, but I don't recall him requesting contacts from me to provide them.

Question. Did you ever provide him with any information?

Answer. I believe we had a discussion on who were active trustee participants from California, since he had participated in that region.

Question. Did you send him anything written following this discussion?

Answer. I may have provided him a copy of the State lists for California of trustees.

Question. Did Mr. Huang specifically request information about California?

Answer. I can recall that being a—a discussion in the context that he had been active in California fund-raising prior.

Question. Did you ever send Mr. Huang a list of all of the trustees or managing trustees at any time when he was a fund-raiser at the DNC?

Answer. No, not that I recall.

Question. Do you know whether he ever requested such a list?

Answer. I have no recollection of such request.

Question. Did—are you aware of any contacts between Mr. Huang and any of the individuals that you have named as being part of your office staff?

Answer. No, I'm not aware of contacts.

Question. Did Mr. Huang ever share any information with you? Did he ever provide you with a list of individuals or names?

Answer. I don't recall ever getting names from him.

Question. Do you recall ever receiving any information from Mr. Huang?

Answer. As I mentioned earlier, in the context of being a trustee director and providing people that made the requisite contribution, that was the context, I believe, the information he provided me.

Question. Did he ever provide anything other than a check and a check tracking form, if indeed he provided you that? I mean, did you receive checks and check tracking forms from Mr. Huang?

Answer. No. I never received checks from Mr. Huang. I don't remember the format he used to provide the names and addresses. They may have been photocopies of check tracking forms, or he may have typed out a list, but I don't recall.

Question. Now, why would Mr. Huang have occasion to provide any information to you?

Answer. All fund-raisers provided the trustee department with information of, you know, as I stated earlier, people who had raised the requisite amount of money or contributed, so that they were correctly listed, properly listed on our trustee list. So in that context, he would have had provided that information.

Question. Did he send you the check tracking forms of all of the people that he solicited contributions from?

Answer. No, he did not.

Question. Did he—did he send you check tracking forms from a number of individuals from whom he solicited contributions?

Answer. As I stated earlier, I don't recall how he provided the information for the trustee lists, whether it was photocopies of tracking forms or if it was a typed list. People provided that information to my department both ways. Some just gave us an additional photocopy, others would do a more thorough-type list, and I don't remember how John, Mr. Huang provided that information.

Question. Do you recall whether he ever provided for you additional biographical information on any individuals?

Answer. I don't recall that.

Question. Did you ever participate in any discussions with DNC colleagues about whether Mr. Huang was providing information sufficient to provide the FEC with the required information on campaign donors?

Answer. I don't recall such discussion. I don't recall.

Question. Do you know whether Mr. Huang traveled out of the United States while he was employed as a fund-raiser at the DNC?

Answer. I have since read about that since the November election, but prior to that I did not know that.

Question. Do you recall any discussion about Mr. Huang traveling prior to—and this—this I'm asking for your recollection. Prior to November 1996, do you recall any discussions relating to Mr. Huang and his travel schedule?

Answer. No, I don't recall any.

Question. Do you know who would have approved Mr. Huang's travel requests?

Mr. PIERSON. Any travel requests?

Mr. WILSON. Correct.

The WITNESS. No, I—in the context of how I would do it, it would be the finance chairman or the finance director. I don't know if it was the same for John, but I—I don't know how he had his travel approved.

EXAMINATION BY MR. WILSON:

Question. And does your answer indicate that that's the process that you would follow——

Answer. Un-huh.

Question [continuing]. When you were seeking——

Answer. Correct.

Question [continuing]. Travel approval?

Answer. Correct. The process I assume most finance staff proceeded with.

Question. What did you have to do to obtain approval for travel?

Answer. Generally, you didn't have to obtain it, you were told that you were going somewhere, so you needed to just fill out a form that was then submitted to the person who had purchased the tickets with your times and dates of departure.

Question. Do you know whether Mr. Huang ever solicited contributions—strike that question, please. was there a system at the DNC to keep track of how much individual fund-raisers raised?

Answer. I don't know if there was a system set up for that, but you could run that, my understanding, through the AS400. And as we looked at documents earlier, where it said "fund-raiser," you could, I believe, sort by that field and get a list run of who was involved in raising what funds.

Question. Do you recall ever seeing a list of the aggregate contributions raised by Mr. Huang?

Answer. No, I don't recall ever seeing that.

Question. Did you ever print up for yourself a list of the aggregate contributions for which you were named as the fund-raiser?

Answer. I would have to request that, because I wasn't familiar with running the lists on the AS400 system.

Question. Did you ever request that for yourself? And I'm speaking about for yourself as the fund-raiser, not Mr. Huang at all. But did you ever request that you run a list of all of the contributions that you were listed as the fund-raiser of?

Answer. I never requested it. I recall seeing one, but it was not at my request.

Question. Where did you see the one that you recall seeing?

Answer. I believe Ms. Stirk may have had a copy of it.

Question. Do you know if she—why she would have had a copy of it such a list?

Answer. I don't recall. No.

Question. Do you know whether spreadsheets indicating aggregate contributions produced by individual fund-raisers were printed up for everybody?

Answer. I have no knowledge of that.

Question. The printout that you just mentioned with aggregate contributions wherein you were listed as the fund-raiser, did that include all of the years for your employment as a fund-raiser at the DNC?

Answer. I believe it was—as I recall, it was in—sometime in '95, so it included the year and a half prior to it.

Question. Did anybody at the DNC ever tell you that Mr. Huang might be accepting contributions from non-U.S. citizens?

Answer. No. I don't recall ever having such a discussion.

Question. Did anybody from outside the DNC ever tell you that Mr. Huang might be accepting contributions from non-U.S. citizens?

Answer. Not that I recall, no.

Question. Do you recall any discussions during which it was suggested that Mr. Huang might be accepting contributions from non-U.S. citizens?

Answer. No. I don't recall it.

Question. Do you recall when you last had personal contact with Mr. Huang?

Answer. I believe it was sometime during the summer of '96.

Question. Did you ever visit him in his offices when he was a DNC fund-raiser?

Answer. As I recall, he did not have an office. It was sort of in a cubicle area. And I may have visited him and seen other people or—but I don't recall him having a physical office space.

Question. Where was the cubicle located?

Answer. My recollection is it's in the basement level of the DNC.

Question. And where was your office?

Answer. On the third floor.

Question. And the cubicle that Mr. Huang used, what office was it attached to? Or who was—who had the other cubicles around that cubicle?

Answer. The—what we call like the road staff, the road fund-raisers, people who travel in and out from events around the country. There was an area where they had a desk for a little while while they were in town .

Question. Were you aware if Mr. Huang had an office at another location in Washington?

Answer. I was not aware of that.

Question. Do you know if anybody at the DNC has been in contact with Mr. Huang subsequent to November of 1996?

Answer. I don't know of any contacts.

Question. Have you had any contacts with Mr. Huang since November of 1996?

Answer. I have not.

Question. Did you ever have any discussions with Mr. Huang as to why he left the Department of Commerce?

Answer. I don't recall such a discussion.

Question. Did you ever express any concern to either Mr. Huang or DNC colleagues about a fund-raiser at the Sheraton Carlton Hotel in Washington, D.C., that Mr. Huang was an organizer of?

Answer. I don't recall the event.

Question. Did you know of the event at the time?

Answer. It does not sound familiar.

Question. Were you aware of Mr. Huang's participation in organizing a fund-raiser at the Shilla temple in California? Were you aware prior to 19—to November of 1996 about this particular fund-raising event?

Answer. I was not.

Mr. WILSON. I've provided the witness with a document which has been marked exhibit AS–9. It was premarked with a Bates number that was cut off in the copying process, not cut off by us, but cut off by the people that copied it before it was transmitted to us. Its Bates Number begins DNC 312837, and then the other numbers are obscure. It's titled "DNC Finance Executive Summary," and there's a handwritten notation on the bottom.

[Swiller Deposition Exhibit No. AS–9 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. Do you recognize the handwriting on this?

Answer. I do.

Question. You do.

Answer. Uh-huh.

Question. And whose handwriting is that?

Answer. To me it looks like the handwriting of mat Gobush Matt Gobush.

Question. And who is Mr. Gobush?

Answer. He had served at some—for some time as the staff assistant for the trustee program.

Question. What is the TRULIST?

Answer. It would it would be trustee list. My recollection would be an abbreviation for trustee list.

Question. And do you know why this notation has been written on this document?

Answer. No, I don't recall.

Question. Was—was Mr. Huang a member of the Trustee Program prior to his going to the Department of Commerce?

Answer. My recollection was that he was on the trustee list when I returned to the DNC in November of—in December of '93.

Question. And do you recall whether his name was taken off the trustee list?

Answer. I recall that he may have—in looking at this, he may have lapsed as a trustee, because he did not maintain the level of contribution or fund-raising necessary to be a trustee. So, you know, it would lead me to think that this was then—he was then deleted from the trustee list, because he was no longer an active participant at the requisite level.

Question. Do you know if anybody contacted him to attempt to obtain from him requisite contributions to get him back on the trustee roster?

Answer. Not that I recall.

Question. When—when Mr. Huang was an employee of the DNC, were you aware of whether he had any relationship with Charlie Trie?

Answer. I did not know if they had or did not have a relationship.

Question. Do you know whether they ever had worked together on a fund-raising issues?

Answer. Not that I'm—not that I have specific knowledge of, no.

Question. Did Mr. Trie in any of his conversations with you ever mention Mr. Huang to you?

Answer. Not that I recall, no.

Question. Did Mr. Huang in any conversations with you mention Mr. Trie?

Answer. No, not that I recall.

Question. I would like to go off the record if we could.

[Discussion off the record.]

[Lunch recess, 1:00 p.m.]

EXAMINATION BY MR. WILSON:

Question. If we could go back on the record, please.

Have you ever met Johnny Chung?

Answer. I have.

Question. And where have you met Mr. Chung?

Answer. I met him at a few events we did while I was at the DNC, and I also met him when he came to the DNC. I visited with him there. I also paid a visit to his office in California.

Question. When did you visit his office in California?

Answer. It was while I was working on an event in California in spring, I think either late March-April of 1995.

Question. And why did you visit his office?

Answer. I was responsible for a fund-raiser that we were working on in California, in Los Angeles, so I was contacting all of the trustees who had been supportive in the past, trying to get their support for that event, or to identify other individuals who may also want to be supportive.

So in that context, I contacted all the trustees on the list, and Johnny was one of many who I visited with.

Question. What was the fund-raiser that you were working on?

Answer. We did a high dollar couples events at the home of Steven Spielberg that the President attended. The contributions were made to the DNC for those who attended.

Question. And when you visited Mr. Chung, what did you discuss at his office?

Answer. I remember discussing a few things. I remember he had an office that had pictures of Mr. Chung and every elected official I think since Lincoln on the walls, Republican and Democrat, and I mean we discussed the fund-raiser. I remember he was bringing additional couples and I told him that that would require additional contributions for the event.

Question. Do you recall how much Mr. Chung contributed to that event?

Answer. My recollection is he made one individual check contribution of $125,000.

Question. And how many individuals did he take as guests to that fund-raiser?

Answer. I believe total there were three couples, he and his wife included.

Question. When you visited him at his office, was it a few days before the fund-raiser you are speaking of, or was it well in advance of the fund-raiser you are speaking of?

Answer. I was only in California about two weeks prior to the event, and it was in that time frame, so in the two weeks prior.

Question. Did Mr. Chung ever visit you in your office at the DNC?

Answer. Yes, he did.

Question. And approximately how many occasions did Mr. Chung visit you in your office?

Answer. We had—no visits were necessarily scheduled for me. He would come to the DNC on occasion by himself or with a few individuals and would stop by. So I would say maybe three or four times that he stopped by my office to say hello while he was visiting the DNC.

Question. On these occasions, did he ever bring other individuals with him?

Answer. On a couple I recall he did.

Question. Who did he bring with him on the visits he made to your office?

Answer. I remember him—I don't remember the individuals, but I remember him identifying them as being partners of his or business associates.

Question. And did he discuss what their businesses were?

Answer. Not that I recall, no.

Question. Do you have any general recollection of what the individuals that came with him to your office did for a living?

Answer. I don't.

Question. Approximately how many contributions—actually, if you could, just describe the various contributions that you solicited from Mr. Chung?

Answer. I don't recall other contributions that I solicited directly from him. That was the major contribution that I was involved with. There are other people who worked with Mr. Chung. I am trying to think—I don't remember dates and other contributions, that is one that sticks out, the one I described earlier.

Question. Who else at the DNC worked with Mr. Chung?

Answer. Mr. Sullivan, Mr. Fowler, Mr. Fowler's executive assistant, Carol Khare. Those were the primary contacts.

Question. Do you know whether Mr. Chung ever contacted members of the staff in your office?

Answer. No, I believe he dealt with me in my department.

Question. Did you keep a trustee file for Mr. Chung?

Answer. I am sure it was included with the other members of the trustees, yes.

Question. Do you recall the contents of this file?

Answer. I assume like other files, it would have, as I discussed earlier, copies of checks, tracking forms, a bio. If we sent letters or correspondence to him, we may have kept a record of those.

Question. Do you recall whether you kept any photographs of Mr. Chung with other dignitaries?

Answer. I don't recall keeping any photographs at all of any individuals, so I don't think I would have any.

Question. Did you, prior to November of 1996, have any misgivings about Mr. Chung as a contributor?

Answer. No, I did not.

Question. Had you ever asked anybody to perform any background research on Mr. Chung?

Answer. Not that I recall, no.

Question. Did you ever receive any background research about Mr. Chung?

Answer. I don't recall that.

Question. From other offices?

Answer. No, I don't recall ever receiving any.

Question. How frequently would you communicate with Mr. Chung?

Answer. It was sporadic. I tended to communicate with him closer to an event that may be in California that he would be interested in participating in, and at that time I could contact him maybe two or three times in the weeks prior. Other than that, it was infrequent. Once every other month would be a high number, I think.

Question. I have a document which I will mark Exhibit AS–10.

[Swiller Deposition Exhibit No. AS–10 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. I will provide that for the witness. It is a memorandum to Richard Sullivan from David Mercer, and it is a list that had been requested purportedly by Mr. Sullivan for a Vice Presidential luncheon on 9–21, which is presumably 1994. The document is dated September 14, 1994.

It mentions that this is a pool of some of the best raisers and writers to draw from.

Do you recall ever having seen this document?

Answer. I do not.

Question. Was there a list kept of the more significant contributors or the best campaign solicitors from outside of the DNC staff that you were aware of in the DNC?

Answer. Not to my knowledge, no.

Question. Did colleagues of yours at the DNC have any discussions with you about Mr. Chung and mention to you that he was one of the better or best fund-raisers from amongst contributors to the DNC?

Answer. We discussed that he made large contributions. I don't recall him being much of a fund-raiser.

Question. Are you aware of Mr. Chung ever soliciting contributions from anybody else?

Answer. Not that I can recall, no.

Question. Is it fair to say then that your interactions with him led you to believe that he was contributing money merely himself and not soliciting funds from anybody else?

Answer. Correct.

Question. Did you ever have any concerns that funds contributed by Mr. Chung might not be his own funds?

Answer. No, I did not.

Question. Did you ever have any conversations where anybody else at the DNC expressed concerns that funds contributed by Mr. Chung might not be his own funds?

Answer. No, not that I can recall.

Question. Did you ever have any conversations with anybody outside of the DNC about Mr. Chung's fund-raising contributions?

Answer. Not that I can recall, no.

Question. Do you have any recollections of whether anybody at the White House ever contacted you to ask you any questions about Mr. Chung?

Answer. No, not that I can recall.

Question. Do you know whether anybody from any of the Executive Branch agencies contacted you and asked questions about Mr. Chung?

Answer. I don't recall that.

Question. Do you recall any instances where Mr. Chung asked you to do anything for him?

Answer. No, I don't recall specific instances. I recall—Johnny—Mr. Chung was always concerned with receiving photographs of events, so he was always calling after events to get—to expedite sort of getting him photographs of himself with the dignitary at the event. But those were the events that come to mind.

Question. Did you ever help to arrange for Mr. Chung to meet with any administration employees?

Answer. No, not that I recall.

Question. Did you ever receive any requests from Mr. Chung about government trade missions?

Answer. No, I did not.

Question. Did Mr. Chung ever mention John Huang to you?

Answer. I don't recall that in any conversation, no.

Question. Do you recall whether you ever made any requests of any White House employees on behalf of Mr. Chung?

Answer. No, not that I recall.

Question. Were you aware in 1995 that Mr. Chung and a number of Chinese businessmen attended a Presidential radio address?

Answer. I have subsequently found out about it, but at the time I didn't. I don't have a recollection of knowing about it.

Question. Do you recollect any conversations wherein somebody else might have mentioned Mr. Chung's attendance at a radio address with the President?

Answer. No, I don't.

Question. In the subsequent knowledge that you have gained about this particular event, did you know—do you know any of the individuals that Mr. Chung attended the radio address with?

Answer. No, I don't.

Question. Had you ever met any of those individuals?

Answer. I may have, but none of the names are familiar to me.

Question. Were you aware of any requests being made by anybody at the DNC of the National Security Council about Mr. Chung?

Answer. No, I was not.

Question. Did anybody ever mention to you prior to November of 1996 that Mr. Robert Suettinger had once described Mr. Chung as a hustler?

Answer. No.

Question. Were you ever aware that—did anybody ever suggest to you that Mr. Chung had ever been approached by either White House or DNC employees in conjunction with contributions to retire debts from the White House Christmas party?

Answer. That is not something I am familiar with, no.

Question. I am providing the witness with a document marked Exhibit AS–11.

[Swiller Deposition Exhibit No. AS–11 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. This is addressed to Mr. Johnny Chung. It is dated August 21, 1995, and the signature blocks are those of Richard Sullivan and Mr. Swiller, and the text of the letter is one sentence: "Thought you would be interested in the enclosed." Do you have any recollection of signing this letter?

Answer. I don't.

Question. Do you have any recollection of this letter at all?

Answer. No.

Question. This takes me away from Mr. Chung for a moment, but did you keep copies of signed letters in your files?

Answer. On occasion. As I referred to earlier, and this may be a case of it, we would send letters accompanying photographs from events that were DNC-sponsored events in which donors would attend the event with the President. This may be such a case where enclosed items were photographs.

Question. Did you personally keep a correspondence file of all the correspondence that you sent out to individuals?

Answer. I didn't, because the scale was so high, and, you know, it was letters like these which really were one sentence, two sentence letters. It would have been, I think, a wasteful exercise.

Question. What types of signed correspondence would you keep?

Answer. I would once in awhile keep similar correspondence like these or letters of invitation to an event. I would sometimes keep those on file because people would sometimes say they never received them and I could refer back to the reference point.

Mr. LU. Before we move away from this document, I think all of us concede the document is unsigned. I just want the record to be clear that is an unsigned letter and there has been no testimony it was even sent out.

EXAMINATION BY MR. WILSON:

Question. Were you aware or have you ever been aware that Mr. Chung spoke with Richard Sullivan about going on a trade mission to China with Commerce Secretary Ron Brown?

Answer. That is not something that is familiar to me, no.

Question. I am providing the witness with a document marked Exhibit AS–12, which is a March 1, 1995 dated document to Kathleen from Richard Sullivan/Ari Swiller.

[Swiller Deposition Exhibit No. AS–12 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. Do you recall ever having seen this document before?

Answer. I don't recall it.

Question. The memo refers to a planned meeting between—or a meeting requested by Mr. Chung. Do you know whether this meeting ever took place?

Answer. I can't say for certain.

Question. Did you typically prepare briefing materials for Chairman Fowler or any other DNC employees involving meetings with individuals who were trustee members?

Answer. Yes.

Question. Do you recall ever participating in any meetings with Mr. Chung and Chairman Fowler?

Answer. I can—there is one that comes to mind, yes.

Question. Do you remember when that meeting was?

Answer. I believe it was sometime in 1995. I don't remember the exact date.

Question. And what was discussed at that meeting?

Answer. The reason why it comes to mind, I remember Mr. Chung informing Mr. Fowler that he was going to make a personal effort to try to win the freedom of a gentleman named Harry Wu, I believe—Henry Wu or Harry Wu. At the time he had become imprisoned and it was a highlighted case by the Chinese government.

Question. And do you recall what Mr. Fowler said in this meeting?

Answer. I don't recall what he said to Mr. Chung. I recall afterwards we were sort of in disbelief at Mr. Chung's idea that he could play a role. But I am sure, you know, Mr. Fowler was pleasant in his conversation with him.

Question. Do you have a recollection of the sense of what was communicated to Mr. Chung?

Answer. I am sure Mr. Fowler thanked him for his support of the DNC and wished him luck in his endeavors, but I don't recall any offer of support from the DNC, because we never got involved in those sorts of affairs.

Question. Do you know whether Mr. Fowler told Mr. Chung that the DNC would not be supportive of Mr. Chung's endeavors?

Answer. I think it was understood. I don't remember him directly saying that.

Question. Do you know if Mr. Chung met with Richard Sullivan and Chairman Fowler at any time in 1995 at the White House mess?

Answer. I don't have recollection of such a meeting, no.

Question. You had mentioned earlier that Mr. Chung had made—I should ask you this, because I don't recall exactly what you said. But did Mr. Chung ever contact you specifically about obtaining photographs that had been taken with himself and other individuals?

Answer. Yes, he did.

Question. Did he ever contact you in regard to photographs that were taken of himself and business associates at the Presidential radio address?

Answer. No, he did not, that I recall.

Question. Do you recall which photographs he did contact you about?

Answer. The photographs I recall being requested were ones in connection to the event where I solicited the contribution from Mr. Chung at the home of Mr. Spielberg.

Question. Do you recall any other requests from Mr. Chung about photographs?

Answer. No, that is the one that comes to mind.

Question. Did Chairman Fowler or Richard Sullivan ever request that you find photographs involving Mr. Chung?

Answer. Not that I can recall, no.

Question. Did you ever provide photographs for Mr. Fowler or Chairman Dodd or Mr. Sullivan for their review prior to their being sent out to individuals?

Answer. Not as far as Mr. Fowler or Mr. Dodd. On occasion if I couldn't identify certain people in a group of photos I was given, I would ask Mr. Sullivan for his input on who they might be. But I don't recall ever being requested to provide them with photos, no.

Question. I will ask the same question for after photographs have been sent out. Did anybody after the fact ask you to find a photograph or track down a photograph that had been sent out previously to an individual for purpose of reviewing the photograph?

Answer. "Anyone" meaning?

Question. I apologize, "anyone" meaning Chairmen Dodd, Fowler, or Mr. Sullivan?

Answer. Mr. Sullivan may have. I don't recall requests like that ever coming from Mr. Fowler or Mr. Dodd.

Question. Do you know an individual whose name is Sheng Huaren, S-H-E-N-G H-U-A-R-E-N?

Answer. The name is not familiar to me, no.

Question. Are you familiar with the China Everbright Group?

Answer. I am not.

Question. Do you recall whether you have ever heard that name before?

Answer. I don't recall hearing it before, no.

Question. Do you recall ever having heard the name of a Mr. Qiu Qing, which is spelled Q-I-U Q-I-N-G?

Answer. No, I don't recall that name.

Question. Have you ever met Roger Tamraz?

Answer. Yes, I have.

Question. Where have you met Mr. Tamraz?

Answer. I met Mr. Tamraz for the first time at the Democratic National Committee.

Question. Was this the convention or a meeting?

Answer. At the committee. At the headquarters.

Question. Okay. And what was the occasion of meeting Mr. Tamraz?

Answer. I had, as my department often did, sent solicitations to businesses across the country informing individuals and corporations about the program and encouraging them to support it. In response to that, I received a call from a partner of Mr. Tamraz who indicated to me that he or his partner were interested in participating at the trustee or possibly the managing trustee level and wanted to come to Washington to discuss that.

Since the level is high, they had offered to come to Washington, I asked to set up a meeting with Mr. Fowler at the DNC. The person who came representing the

company was Mr. Tamraz, and that is the first time I met or spoke to him, was when he came to the DNC.

Question. The initial contact from Mr. Tamraz or his associate, what was the form of that contact?

Answer. They phoned me.

Question. And do you recall when Mr. Tamraz came and met with you?

Answer. It was in July of 1995.

Question. How long was the meeting after the telephone call took place?

Mr. PIERSON. Are you talking about the meeting in Chairman Fowler's office?

EXAMINATION BY MR. WILSON:

Question. No, let me clarify this, because I don't want to muddy this issue. Is it correct to say that you met with Mr. Tamraz, just the two of you the first time?

Answer. That is not correct.

Question. Okay. Just if you could, just explain. Mr. Tamraz came in and met with yourself and other individuals. Who were the other individuals?

Answer. His initial meeting was with myself and Chairman Fowler, and after that meeting, there was immediately following a follow-up meet with myself and Mr. Tamraz which Mr. Pastrick attended part of.

Question. And the first meeting, where did that occur?

Answer. In Mr. Fowler's office at the Democratic National Committee.

Question. And where did the second meeting occur?

Answer. It occurred in an office adjacent to mine that was used—that was set aside for the finance chairman.

Question. Did you ever prepare any memoranda about the initial meeting with Mr. Tamraz?

Answer. I don't recall in this case the memoranda I proposed for this meeting, but it was customary that I did provide a little bit of information.

Question. I will provide the witness with a document which was marked Exhibit AS–13. If you could take a minute just to look at this.

[Swiller Deposition Exhibit No. AS–13 was marked for identification.]

Mr. PIERSON. For the record, counsel, this is several documents. The first one is DNC 3116350. The last one is DNC 3116355. They appear to be sequential.

Mr. WILSON. Just to clarify, it appears the last two pages of the document may be out of sequence, 55 followed by 54. I just want to check that you have the same.

Mr. PIERSON. Mine are in sequence.

Mr. WILSON. Okay.

[Discussion off the record.]

EXAMINATION BY MR. WILSON:

Question. The first page of that which I provided you has just the handwritten notation "Roger Tamraz" on it. Do you recognize this writing?

Answer. I do not.

Question. Turning your attention to the document marked DNC 3116354, which is a memo from Mr. Sullivan, Mr. Swiller, to Roger Tamraz, it discusses contributions and the date is March 28th, 1996. Do you recall preparing this memorandum?

Answer. I recall being asked for the information on this memorandum, correct.

Mr. PIERSON. That wasn't what he asked you. He asked you whether you prepared it.

The WITNESS. I don't believe I prepared this memorandum.

EXAMINATION BY MR. WILSON:

Question. Did you supply the information that is in this memorandum?

Answer. Yes.

Question. Who asked you for that information?

Answer. My recollection is that Mr. Sullivan did.

Question. Did you keep records of contributions that Mr. Tamraz made to organizations other than the DNC?

Answer. Yes, I did.

Question. And for what purpose did you keep such records?

Answer. To keep a sum of contributions Mr. Tamraz made to Democratic affiliated campaigns.

Question. Who provided you with this information?

Answer. In the case of a lot of these contributions, Mr. Tamraz forwarded them to the DNC office.

Question. What did Mr. Tamraz forward to the DNC office?

Answer. The contributions.

Question. And by that do you mean he actually forwarded a check directly to the DNC office?

Answer. Correct.

Question. And in situations like that, what would the DNC do with those things?

Answer. They tended to be sent to the entity that they were directed to with an accompanying letter.

Question. Were records of those contributions kept by the DNC?

Answer. I believe in some cases they were, yes.

Question. And how were the records kept?

Answer. My recollection is that there was a list comprised by a woman named Theresa Stark of contributions sent to DNC that were for entities that weren't the DNC.

Question. Do you know whether this information was entered in the AS 400 computer database?

Answer. I don't know for certain, no.

Question. Did Mr. Tamraz ever discuss with you campaign contributions?

Answer. Yes, he did.

Question. Did you have discussions about campaign contributions to entities other than the DNC?

Answer. Yes, I did.

Question. Did you provide any recommendations as to whom he should make campaign contributions?

Answer. Yes, I did.

Question. Why did you—the campaign contributions, just referring to the ones on the memorandum we are examining, the March 28, 1996 memorandum, why did you suggest that Mr. Tamraz contribute to the entities listed on this memo?

Answer. I don't recall the exact conversation on the ones that sit on this memo.

Question. Had you ever received instructions from any other DNC employees as to where campaign contributions might be made?

Answer. From Mr. Tamraz?

Question. From anybody, other than the DNC.

Answer. Yes, I did.

Question. Who would give those instructions?

Answer. The ones I recall were either Mr. Fowler or Mr. Sullivan.

Question. Did you ever receive any memoranda that outlined these types of instructions?

Answer. Not that I can recall, no.

Question. Is your recollection that the communications you had were solely verbal?

Answer. Yes, that is correct.

Question. Did you discuss these particular contributions with Mr. Tamraz?

Answer. The ones listed on the memorandum?

Question. Yes.

Answer. I don't recall a specific discussion of these.

Question. Did you forward this memorandum to Mr. Tamraz?

Answer. I did not forward it to him.

Question. Do you know whether Mr. Sullivan is responsible for forwarding this to Mr. Tamraz?

Answer. My only recollection is he requested some of the information. I don't know if it was then forwarded.

Question. Do you know why it was suggested that he provide a contribution to the Virginia Democratic Party?

Answer. I recall there being a request that he provide it to the Virginia Legislative Campaign Committee in connection with the '95 election cycle, but I don't recall that specific to the Democratic Party contribution.

Question. And was that information communicated to you or the suggestion that Mr. Tamraz—if you could just state again, who was it that suggested to you that Mr. Tamraz might make a contribution to the Virginia Democratic Party?

Answer. My recollection is that direction came from Mr. Fowler.

Question. Do you recall whether you had a meeting with Mr. Fowler to discuss where campaign contributions should be directed?

Answer. I don't recall a formal meeting. I recall sort of a meeting in passing.

Question. Do you know if Ms. Khare, Carol Khare, was in contact with Mr. Tamraz at any time in 1996?

Answer. I don't know for certain, no.

Question. Did you ever discuss Mr. Tamraz with anybody at the DNC except for Mr. Sullivan and Mr. Fowler?

Answer. I discussed with Mr. Pastrick and Marvin Rosen.

Question. The meeting that you earlier described between Mr. Fowler, Mr. Tamraz and yourself, do you recall the date of that meeting?

Answer. I don't recall an exact date. I believe it was in July of 1996.

Question. Do you recall how long the meeting lasted?

Answer. I believe it was a half-hour to 45 minutes.

Question. And what was discussed at that meeting?

Answer. I remember that Mr. Tamraz stated that he was very interested in being supportive of the President and of the party, that he was encouraged by the President's policies. He went on to describe how he wanted to be financially supportive.

Mr. Fowler thanked him for that. Mr. Tamraz went on to discuss and provided a copy of a Newsweek article, I believe he had the magazine with him, which talked about a pipeline construction that his company was undertaking in Russia, and I remember him describing that the project hadn't physically started, but that the steps to get it were well on their way, and that he had many corporate clients who were supporting his effort. He was just informing us of sort of who he was and what his business was.

Question. Do you know how many times Mr. Fowler met with Mr. Tamraz?

Answer. I don't.

Question. If you could just—the document I provided you earlier, which was provided because I believe it came from a file of some sort, you have indicated that you don't recognize the handwriting on the first page of it, but the second page, the third page and the fourth page have what appear to be a memorandum to Mr. Fowler from Alejandra Castillo. If you could take just a moment to review that memorandum.

Mr. PIERSON. For the record, these are pages DNC 3116351 through 6353.

EXAMINATION BY MR. WILSON:

Question. Did you receive a copy of this memorandum?

Mr. PIERSON. At any time before——

EXAMINATION BY MR. WILSON:

Question. At—well, I must be clear on this. Did you receive a copy of this memorandum at any time in 1995?

Answer. I don't recall specifically receiving it.

Question. Do you recall receiving a copy of this memorandum at any time before November of 1996?

Answer. I don't recall a specific time of receiving it.

Question. But do you recall whether you did receive this memorandum?

Mr. PIERSON. Before the election?

Mr. WILSON. Before the election.

The WITNESS. I don't recall a certain time of receiving it, no—or receiving it.

EXAMINATION BY MR. WILSON:

Question. The third page of this memorandum, in the second paragraph, in the conclusions section, states that, in a conversation held with Ari Swiller yesterday, Mr. Tamraz has expressed his desire to contribute $300,000 to the DNC. Did you speak with Ms. Castillo about your meeting with Mr. Tamraz?

Answer. I recall having discussions with Ms. Castillo about Mr. Tamraz. I don't recall the specific discussions.

Question. Do you recall what she asked you?

Answer. I think she was inquiring whether I knew some of the information that has been provided in this document, and I believe it may have been the context of my discussion with Mr. Tamraz.

Question. The first paragraph of this conclusion section on the third page of the memorandum indicates that it is clear that Mr. Tamraz has several problems pending before the international business community. Did Ms. Castillo discuss with you any of the specifics of what she knew about Mr. Tamraz?

Answer. I remember either seeing in news articles or hearing from her some of the items that are brought up in this document that refer to business problems or problems pending in the international business community.

Question. In the first paragraph of the memorandum, in what is the second sentence, it states, as a potential managing trustee member, Mr. Tamraz' business dealing may have potential, if not definite—if not definite political and ethical implications on the DNC fund-raising operations.

Did you have any discussions with anybody at the DNC prior to November of 1996 about the implications Mr. Tamraz' business dealings might have for the DNC?

Answer. I believe I did, yes.

Question. And who did you talk to?

Answer. I believe I talked to Ms. Castillo and possibly—my recollection would be Mr. Sullivan or Mr. Pastrick.

Question. And what was discussed when you spoke with Ms. Castillo?

Answer. As I stated earlier, some of the concerns that she highlights in this memo I think are part of that discussion.

Question. Now, had she communicated these concerns to you for the first time? You had not heard of these concerns before she spoke to you; is that correct?

Answer. As I recollected—in reflecting, that's correct. I may have seen articles. I don't know the timing—if I saw the articles, we had the discussion, she brought them up with the articles. I don't remember the sequence, but—I didn't have a longstanding prior knowledge, no.

Mr. PIERSON. May I have a moment, please?

[Witness conferring with counsel.]

Mr. PIERSON. If you would like to add to your answer please.

The WITNESS. Yes. Mr. Tamraz, during our discussion, mentioned—I'm sorry, during my meeting with Mr. Fowler and Mr. Tamraz, he mentioned sort of in passing that he had a controversial background, which is something that I think came up in discussions following with Ms. Castillo—in the following conversations that I may have had with other DNC folks, that we mentioned that as well.

EXAMINATION BY MR. WILSON:

Question. Prior to your meeting with—the first meeting with Mr. Tamraz, a meeting that Mr. Fowler attended, did you yourself do or did you request anybody else to do any background research on Mr. Tamraz?

Answer. Not that I recall, no.

Question. Did you communicate to anybody the nature of the controversial background that you just mentioned Mr. Tamraz brought to everybody's attention?

Answer. I don't remember him—sorry. Restate the question.

Question. My understanding from what you just said was that Mr. Tamraz himself brought up controversial background in your meeting with yourself and Mr. Fowler. Once you learned of that during that meeting, did you bring that to anybody else's attention?

Answer. I don't recall specifically doing that. I may have brought it to the attention of Ms. Castillo as she was preparing this memo. In follow-up, I may have also mentioned it to Mr. Pastrick following our meeting with Mr. Tamraz, that he had mentioned something about this.

Question. Did Ms. Castillo tell you or mention to you that she was preparing a memorandum about Mr. Tamraz?

Answer. I don't remember her telling me before preparing it or providing it and saying, I have a memorandum. I don't remember there being a sequence where she first informed me and then provided it.

Question. Did you provide her with any information prior to the drafting of this memorandum?

Answer. In my conversation, I may have referenced the article in NewsWeek which Mr. Tamraz had referenced in his discussion with Mr. Fowler and I, and I may have had some discussion with her about the context of our conversation with Mr. Fowler.

Question. Had you seen the NewsWeek article?

Answer. Not prior to my meeting with Mr. Tamraz.

Question. After you met with Mr. Tamraz, did you see that NewsWeek article that you just discussed?

Answer. He had it in the meeting.

Question. Did he provide a copy of the article to you?

Answer. I believe he left a copy, yes.

Question. Do you recall whether he left any other material or information?

Answer. Not that I remember, no.

Question. Did you have any discussions with Ms. Khare about Mr. Tamraz' background?

Answer. I don't recall any discussions with Ms. Khare, no.

Question. Do you know whether Ms. Khare made any inquiry's about Mr. Tamraz' background of anybody else other than yourself?

Answer. Not that I'm aware of, no.

Question. Do you know—do you have any knowledge of whether this memorandum was circulated to anybody other than the addressee of the memorandum, other than to Mr. Fowler?

Answer. Not that I recall, no.

Question. Do you know if Mr. Tamraz had subsequent discussions with either yourself or Chairman Fowler about his oil pipeline proposal?

Answer. I don't know of his discussions with others. I do not recall any discussion with me about the pipeline following that initial conversation.

Question. Do you know if Chairman Fowler ever offered any assistance to Mr. Tamraz in meetings with the Federal officials? And I ask that in terms of did you know that before November of 1996?

Answer. No, I did not.

Question. Did Chairman Fowler tell Mr. Tamraz or discuss with Mr. Tamraz contributions to the DNC at the meeting you attended with the—the first meeting you attended with Chairman Fowler and Mr. Tamraz?

Answer. Did Mr. Fowler discuss it?

I think Mr. Fowler thanked him for Mr. Tamraz' willingness to be supportive. I recall that during—the figures and how contributions were made were not discussed at that time.

Question. Is it correct to say that, at that point, Mr. Tamraz had not made a contribution to the——

Answer. That's correct.

Question [continuing]. To the DNC?

Did you have—ever have any discussions with anybody at the DNC prior to November 1996 of whether the—anybody in the Clinton administration was being supportive of Mr. Tamraz' oil pipeline project?

Answer. I don't—no, I do not.

Question. Did you ever talk to anybody in the administration—and by that I mean any executive branch or agency officials, nonDNC employees—about the Tamraz oil pipeline proposal?

Answer. Not that I recall.

Question. Did you ever get any requests from anybody else outside of the DNC prior to November of 1996 about the Tamraz oil pipeline project?

Answer. Not that I recall.

Question. Did you ever have any discussions about Mr. Tamraz being banned from a commerce trade board?

Answer. I'm not familiar with that. No.

Question. Do you know if Ms. Khare had any discussions with Department of Commerce Employees about Mr. Tamraz?

Answer. Not that I'm familiar with.

Question. Just referring back to the meeting between yourself and Mr. Fowler and Mr. Tamraz, what did Mr. Tamraz indicate that he was willing to contribute?

Answer. During my meeting with he and Mr. Fowler, there was—no indication was made.

Question. Was there any discussion at that meeting of contributions to entities other than the DNC?

Answer. There was not.

Question. Do you know why Mr. Fowler later communicated that some of Mr. Tamraz' contributions would be—it would be appropriate to have them routed to other entities than the DNC?

Answer. My understanding in the case of the Virginia legislative campaign committee - or council—it was designated there because their election was—they had a '95, an off-year election. So there was a certain urgency to support their campaign effort.

Question. And what about the Louisiana contribution? Was there a reason for that?

Answer. I don't recall.

Question. Do you know if anybody other than Ms. Castillo in the format of the memorandum that we've just been discussing brought any concerns about Mr. Tamraz to Mr. Fowler's attention?

Answer. Not that I'm aware of, no.

Question. Did anybody communicate concerns about Mr. Tamraz to you directly?

Answer. Other than in conversations with Ms. Castillo I'm not aware—I don't recall anyone else communicating concerns.

Question. Once—once Mr. Tamraz did make his contributions, is there any one person that was designated the primary contact between the DNC and Mr. Tamraz?

Answer. Initially, I was his contact. But subsequent to my first few contacts with him, I think he began to work more exclusively with Marvin Rosen.

Question. And in light of the concerns that Ms. Castillo outlined in her memorandum to Chairman Fowler, did you think it was appropriate for the DNC to accept contributions from Mr. Tamraz?

Mr. PIERSON. Can I just interpose an objection?

Mr. WILSON. Sure.

Mr. PIERSON. We've got a temporal disconnect. He was—he can tell you that he saw the Castillo memorandum. So he can't tell you that, in light of what's in the memorandum, he thought anything. But I know he has some substantive testimony to give to you on the subject, so I don't want to interrupt your line of questioning here.

Mr. WILSON. Right.

Mr. PIERSON. I just think the two don't connect.

Mr. WILSON. I understand.

EXAMINATION BY MR. WILSON:

Question. Given your communications with Ms. Castillo about Mr. Tamraz, did you have any concerns about Mr. Tamraz contributing to the DNC?

Answer. I recall having some reservations, yes.

Question. Did you communicate those to anybody?

Answer. I believe I communicated them to Ms. Castillo. I may have communicated them to Mr. Sullivan.

Question. And did you tell anybody else about your concerns?

Answer. Maybe Mr. Pastrick. But I'm not even sure there. But those would be the people, I think.

Question. Did you ever speak with Sheila Heslin or anybody else at the National Security Council about Mr. Tamraz?

Answer. I'm not familiar with her. I don't recall any conversations that I had with people at the National Security Council, no.

Question. Prior to 19—November of 1996, do you recall anybody contacting you about Mr. Tamraz?

Answer. Anyone?

Question. And—I'm puposefully being very broad. Anybody from——

Mr. PIERSON. Outside the DNC?

Mr. WILSON. Yeah. Outside the Democratic National Committee.

The WITNESS. Outside—I don't recall, outside of the people we've discussed, anyone making inquiries of me of Mr. Tamraz.

EXAMINATION BY MR. WILSON:

Question. Apart from the—the communications that we've just discussed with Ms. Castillo, did you ever hear anything about Mr. Tamraz seeking political leverage to advance his oil pipeline proposal?

Mr. PIERSON. Up to the election?

Mr. WILSON. Prior to November, 1996.

The WITNESS. No, I don't recall asking for a leverage.

EXAMINATION BY MR. WILSON:

Question. Were you in contact with Mr. Tamraz after the—after the meeting with Chairman Fowler and Mr. Tamraz and yourself?

Answer. Yeah, immediately following the—that meeting, Mr. Tamraz—as I stated earlier, Mr. Tamraz, Mr. Pastrick and myself had a separate meeting where we discussed contributions more directly.

Question. Do you know if Mr. Tamraz attended DNC events at any time after your initial contact with him?

Answer. Yes, I believe he did.

Question. Do you know what events he did attend?

Answer. I can't recall the specific events, but I do recall seeing him at events. I don't know which ones exactly.

Question. What type of events do you recall seeing him at?

Answer. Fund raisers. Fund-raising galas with dinners.

Question. Do you know—did you know, prior to November, 1996, whether Mr. Tamraz met with nonDNC officials or government employees after the time that you first met him and before November of 1996?

Answer. No, I was not aware of it.

Question. Did you ever have any discussions with Chairman Fowler about Mr. Tamraz visiting the White House?

Answer. I don't recall specific discussion regarding that, no.

Question. Just very generally, do you have any recollection of—of Mr. Fowler discussing Mr. Tamraz and attempts to meet with people in the White House?

Answer. No, I don't have any recollection of that.

Question. Were you aware at any time before November, 1996, that the White House did have objections to Mr. Tamraz attending events in the White House?

Answer. No, I was not aware of that.

Question. Do you have any knowledge of meetings involving Mr. Tamraz and Mr. Sullivan and Marvin Rosen in October of 1995?

Answer. I'm not aware of those specific—that specific time or meeting.

Question. Do you have any knowledge, just in a general sense, of Tamraz meeting with Richard Sullivan and Marvin Rosen?

Answer. As I stated earlier, I was initially his contact at the DNC. But, soon after, his primary contact became Mr. Rosen; and I know that they he met or spoke on the phone on occasion. I don't know the specific times or—or who else was in attendance, but I know that his primary contact became Mr. Rosen.

Question. Are you aware of any telephone calls made by Mr. Fowler to employees of the National Security Council?

Answer. Not prior to recent revelations of it, no.

Question. Did—did Chairman Fowler ever ask for information about Mr. Tamraz—ask you for information about Mr. Tamraz after that initial meeting that you attended with Mr. Tamraz and Mr. Fowler?

Answer. I don't recall any requests, no.

Question. Did Chairman Fowler ever communicate any concerns to you about Mr. Tamraz at any time after the initial meeting that you—that the three of you had?

Answer. Not that I can recall, no.

Question. Do you recall any discussions with Mr. Fowler about Mr. Tamraz or that involved Mr. Tamraz after your initial discussion or after your initial meeting?

Answer. As I stated earlier, Mr. Fowler at some point had indicated to me that a—that I make a request of Mr. Tamraz to designate some of his contributions to Virginia legislative campaign. That's a conversation that sticks to mind. Other conversations, I don't recall.

Question. Do you recall whether there were any conversations?

Answer. I don't.

Are you finished with this?

Question. I think we are. Let me just have a quick review of it.

Do you—do you recall whether you kept a file for Mr. Tamraz among your trustee files?

Answer. I don't—I—I'm sure I did. I don't recall specifically, but he was a trustee, and we had files on all of them. Yes.

Question. Do you know Eric Hotung?

Answer. I know who he is.

Question. Have you ever met him?

Answer. No, I've not.

Mr. PIERSON. Counsel, when you come to a convenient stopping place, can we have several minutes, please?

Mr. WILSON. Let's go off the record.

[Recess.]

Mr. WILSON. If we can go back on the record, please.

EXAMINATION BY MR. WILSON:

Question. Just one follow-up question on the materials we were discussing about Mr. Tamraz and Exhibit 13. If I could provide again the memorandum from Ms. Castillo to Chairman Fowler, the cc is to yourself and to Carol Khare. Why would Ms. Khare have received this memorandum?

Mr. PIERSON. If you know.

Mr. WILSON. To the extent you know.

The WITNESS. To the extent I know, she was Mr. Fowler's executive assistant and sort of like an alter ego. She received some of the information Mr. Fowler received.

EXAMINATION BY MR. WILSON:

Question. Do you know whether in Mr. Tamraz' case she did any follow-up investigation about Mr. Tamraz for Chairman Fowler?

Answer. Ms. Khare?

Question. Yes.

Answer. Not to my knowledge.

Question. Did you ever speak with Mr. Hotung?

Answer. No, I had never done that.

Question. Had you ever received any contacts from Pat O'Connor about Mr. Hotung?

Answer. No I have not.

Question. Do you know Pat O'Connor?

Answer. I do.

Question. And do you know what he does for a living?

Answer. My understanding is he is an attorney and a lobbyist.

Question. And how do you know Mr. O'Connor?

Answer. He's been a long-time Democratic fund-raiser and supporter. I've met him through DNC events and his support of the DNC and fund-raising efforts.

Question. Has Mr. O'Connor ever had any official discussions with you outside of the social context because he—had you ever worked with Mr. O'Connor in an official capacity?

Answer. I don't believe I have, no.

Question. Do you recall whether you helped to arrange any meetings for Mr. Hotung?

Answer. No, I don't recall that.

Question. Have you had any interaction at all with Mr. Hotung?

Answer. I have not.

Question. Do you know either James or Mochtar Riady?

Answer. I know who they are.

Question. Have you ever met either James Riady or Mochtar Riady?

Answer. I have not.

Question. Have you ever spoken with either of them?

Answer. I have not.

Question. Have you ever been asked to arrange introductions for them to administration officials?

Answer. I have not.

Question. Do you recall ever having assisted them in any way?

Answer. No, I do not recall that.

Question. Do you know either Arief or Soraya Wiriadinata?

Answer. I do not know them. They at some point became trustees, but I've never met with them or spoken with them.

Question. Did you solicit contributions from them?

Answer. Never.

Question. Do you know who did?

Answer. My recollection is that John Huang did.

Question. Do you recall whether you've ever had requests to do anything for Mr. or Mrs. Wiriadinata?

Answer. I don't recall that at all.

Question. Do you know Yogesh Gandhi?

Answer. Only what I've read. I've never met him, and I've never been involved with him.

Question. Have you ever been asked to assist him in any way?

Answer. No, I've not.

Mr. WILSON. I've given the witness a document that's marked Exhibit AS–14. It is a letter to President Clinton from an individual named Richard Agins. It does not have Mr. Swiller's name on it anywhere. If you could take just a moment to review this.

[Swiller Deposition Exhibit No. AS–14 was marked for identification.]

Mr. PIERSON. For the record, it is dated August 14, 1996; and it bears number EOP 05587. There may be another number, but that's all that appears.

EXAMINATION BY MR. WILSON:

Question. This is a letter from an attorney in New York to President Clinton, and it discusses a purported arrangement between Chairman Fowler and an organization wherein Chairman Fowler was purportedly promised two videotaped addresses in exchange for a campaign contribution. Do you have any familiarity with the Hermes Enterprises, Limited, organization?

Answer. I do not.

Question. Have you ever heard or seen the name Richard Agins, A-G-I-N-S?

Answer. I have not.

Question. Do you have any familiarity with a dispute involving a Greek-American group and either the President or the DNC?

Answer. No.

Question. Do you know an individual named Ramesh Kapur?

Answer. Yes I do.

Question. Have you met Mr. Kapur?

Answer. Yes, I have.

Question. Where did you meet Mr. Kapur?

Answer. I don't know the first time, but he was a trustee who I saw often at events. He visited the DNC a few times where I would see him. He also attended events around the country where I saw him.

Mr. WILSON. I have provided the witness with a document which is marked Exhibit AS–15. It's a fax cover sheet dated 7/18/95, marked with the Bates Number DNC 3235705.

[Swiller Deposition Exhibit No. AS–15 was marked for identification.]

Mr. WILSON. It—the fax transmission——

Mr. PIERSON. 5707.

Mr. WILSON. Oh, pardon. Correct. Pardon.

Mr. WILSON. The fax transmission indicates that there are five pages included with this sheet, and it's my understanding that all we have received is a single page of a fax transmission cover. If you could take just a moment to look at that.

EXAMINATION BY MR. WILSON:

Question. The fax cover sheet indicates that there are two topics of discussion with Mr. Roger Johnson. Do you recall discussing with Mr. Kapur the contents of this fax cover sheet?

Answer. No, I do not.

Question. Do you recall—do you know whether you ever approached Roger Johnson about arranging a meeting between himself and Mr. Kapur?

Answer. I do not recall that at all.

Question. Did Mr. Kapur discuss with you getting more Indian-Americans into high-level positions at the GSA?

Answer. Not that I recall, no.

Question. The second topic mentioned in this fax cover sheet is about preventing Indian-American businesses from being pigeonholed into smaller contracts when they are capable of handling larger contracts. Did Mr. Kapur have any discussions with you about this subject?

Answer. No. Not that I recall, no.

Question. Do you recall receiving this fax transmission?

Answer. I don't recall.

Question. Do you have any recollection of receiving a resume? This fax cover sheet indicates that a copy of a resume is attached to the fax. Do you recall receiving a resume from Mr. Kapur?

Answer. I don't.

Question. Did——

Mr. PIERSON. Excuse me just a minute.

EXAMINATION BY MR. WILSON:

Question. Did you have any discussions with Mr. Kapur about meetings that he had with administration officials?

Answer. No, I don't recall it.

Question. Do you recall ever assisting Mr. Kapur in setting up a meeting with any Clinton administration employee?

Answer. No, I don't recall it.

Question. Do you recall receiving any requests from Mr. Kapur for assistance on any matter?

Answer. Mr. Kapur would request special preferential seating at events we would do around the country. He would request—he was another person who requested photos and multiple copies of photos. That was probably the extent of the requests that I dealt with.

Question. Do you recall whether you helped him with those requests?

Answer. If those sort of requests—I probably would have helped, maybe not with the seat—giving him preferential seating, but I probably would have heard him out.

Question. Do you recognize the handwriting on the document in front of you?

Answer. I believe I do, yes.

Question. And there is a note at the middle, in the middle on the right-hand side of the document; and I believe it says Ramesh requested trustee as well. Do you recognize that handwriting?

Answer. No. I—if they're the same handwriting, this one is more familiar to me.

Question. And do you know whose handwriting is on the bottom right-hand section of the fax cover sheet?

Answer. It looks to me like the handwriting of Anne Braziel.

Question. Do you know whether Ms. Braziel ever scheduled meetings with administer—between Mr. Kapur and any Clinton administration officials?

Answer. Not that I can recall, no.

Question. Do you know an individual named Mansoor Ijaz? That's I-J-A-Z?
Answer. Yes, sir, I know him.
Mr. PIERSON. Ijaz.
Mr. WILSON. I was going to help with the pronunciation of his name because I'm always sensitive to that.

EXAMINATION BY MR. WILSON:

Question. Have you met with Mr. Ijaz?
Answer. Yes, sir, I have.
Question. Where did you first meet Mr. Ijaz?
Answer. I believe I first met him with at a joint DNC-DCCC—D triple C—event in Washington.
Question. And have you met with him on subsequent occasions?
Answer. Yes, I have.
Question. Where have you met him?
Answer. I met with him in my office at the DNC. I met with him on occasion when I was working in New York in his office in New York, and he hosted a fundraiser at his home with the Vice President. So I met with him at his home prior to the event.
Question. Do you know if Mr. Ijaz ever met with Nancy Soderberg?
Answer. Yes, he did. I believe he did.
Question. Did you know that prior to November of 1996?
Answer. Yes, I did.
Question. Did you assist Mr. Ijaz in meeting with Ms. Soderberg?
Answer. Yes, I did.
Question. Did he request that you provide assistance in setting up a meeting?
Answer. Yes, he did.
Question. Why did he ask you to set up the meeting with Ms. Soderberg?
Answer. Mr. Ijaz believed that he had some concerns that—about nuclear technology development in Pakistan that he thought should be brought to someone's attention. He was working international affairs there.
Question. What is Mr. Ijaz's business?
Answer. My understanding is that he directs a large fund. He's a fund manager. He raises large sums of capital and invests it.
Question. Do you know if Mr. Ijaz has any business and trusts in Pakistan?
Answer. Not that I'm aware of, no.
Question. Did Mr. Ijaz ever discuss South Africa with you?
Answer. I know that he had business trips there. That was the extent of the discussion.
Question. Do you know if he ever traveled to South Africa with a Commerce Department delegation?
Answer. I don't recall that.
Question. Did Mr. Ijaz ever request your assistance in obtaining a space on any Commerce Department travel events?
Answer. No, he did not.
Question. Do you know whether Mr. Ijaz ever attended—well, do you know whether he attended a Washington lunch with the Vice President and South African Vice President Mbeki?
Answer. I believe he did attend that event, yes.
Question. Did he discuss this event with you?
Answer. I believe so, yes.
Question. Did he ask for your assistance in obtaining an invitation to this lunch?
Answer. Yes, he did.
Question. Did you help him with this request?
Answer. I believe I did, yes.
Question. Who did you contact on his behalf, if anybody?
Answer. I believe I contacted staff. I don't remember the person—well, staff in the Vice President's office.
Question. Do you know whether you were—provided any indication of Mr. Ijaz's request to any of your DNC colleagues?
Answer. I may have mentioned it to Mr. Sullivan.
Question. Did Mr. Ijaz speak with you about the Vice-Presidential lunch after the event?
Answer. I believe he did speak with me, yes.
Question. And what did he tell you?
Answer. He was encouraged, thought it was a historic moment and was happy that he had the opportunity to be there.

Question. Do you know if Mr. Ijaz ever met with Chief of Staff Leon Panetta?

Answer. Not that I'm aware of.

Question. Do you know an individual named George Chu, C-H-U?

Answer. I know he was a trustee. I know—I do not know him.

Question. Have you ever spoken with him?

Answer. I have not.

Question. Do you—do you know who, in the DNC, was responsible for contacting Mr. Chu initially?

Answer. My recollection—Mr. Chu, I think, lives in south San Francisco; and his contact was our fund-raiser for that area, a gentleman named Mark Thomann.

Question. Have you had any correspondence with Mr. Chu?

Answer. Correspondence similar that I would have with general correspondence to all trustees.

Question. Did Mr. Chu ever make a request of you or your office?

Answer. Not that I'm aware of, no. Not that I recall.

Question. Do you know an individual named George Gruggiero?

Answer. You can see that—I believe you may be referring to a gentleman named Joseph Ruggiero. If it's an individual at the IMPAC Group.

Question. It's an individual at the IMPAC, yes.

Answer. My contact there was a man named Joseph Ruggiero.

Question. When did you believe you first met him?

Answer. I believe I first met Mr. Ruggiero during the '93 inaugural.

Question. And did you have subsequent contacts with Mr. Ruggiero?

Answer. Yes, I did.

Mr. WILSON. I would like to provide the witness with a document. It's marked Exhibit AS–16 and indicates very clearly that it's Joe Ruggiero and certainly not George. The date of the document is April 3, 1996. It's Bates Number DNC 3063532.

Mr. PIERSON. Through 34.

Mr. WILSON. And subsequent pages, correct, through 34.

[Swiller Deposition Exhibit No. AS–16 was marked for identification.]

Mr. WILSON. The first of the three pages that I've provided to you—actually, I'll give you longer to look at it.

The WITNESS. Okay.

EXAMINATION BY MR. WILSON:

Question. The first of the three pages I've given to you indicates that when you met with Mr. Ruggiero the previous year, which would have been 1995, Mr. Ruggiero had complained about his treatment from the DNC during the previous 2 years. Do you have—do you know what this refers to?

Answer. As I recall, Mr. Ruggiero was very insistent that the—that his participation with the RNC, he received much greater access to President Bush and to administration officials, to Senators, to Members of Congress than he did with his contributions with the DNC.

I remember him indicating that he was a member for what was called Team 100, which I believe was a top-level RNC contributor group, and that through his support of it had opportunities to have photos in the Oval Office with the President, was often included in small meetings with the administration officials, and that he felt that his support of the DNC, he did not receive the same response or access; and it was very discouraging for him.

Question. Did you discuss Mr. Ruggiero's complaints with Chairman Fowler?

Answer. I believe I had conversations that sort of indicated things similar to these lines in the document.

Question. The third page, the three documents I—the three pages I provided to you is what appears to be a letter dated March 8, 1996, from Chairman Fowler to Ambassador Shearer in Finland?

Answer. Uh-huh.

Question. Were you aware at the time that Chairman Fowler wrote to Ambassador Shearer?

Answer. I was aware that a request was made for Mr. Fowler to write such a letter. I was not aware that a letter was sent or that it was ever completed.

Question. Do you—do you have any knowledge of that which is referred to in this letter, which is a libel case involving the company, Integrated Control Systems, Incorporated?

Answer. I recall there being a concern that his company was falsely being accused in Finland. But I don't recall the greater details of it.

Question. So it's your recollection that this involved a legal lawsuit in Finland?

Answer. That's my recollection, yeah.

Question. Do you recall whether you had any subsequent conversations with Mr. Ruggiero or the other individual referred to in this letter, Mr. Erwin, or any other members of IMPAC Group about the libel case in Finland?

Answer. No, I don't recall that.

Question. Did you make any contacts to Ambassador Shearer in Finland?

Answer. No, I did not.

Question. Do you know whether anybody else in the DNC made contact with Ambassador Shearer?

Answer. No. I don't recall that.

Question. One—just a question, a general question, about this particular letter. It is unsigned. Was it—was it a practice of—to the extent you have any knowledge at all, was it a practice of the DNC to retain unsigned correspondence in people's personal files?

Answer. It wasn't a practice.

Question. It wasn't a practice.

Mr. PIERSON. Counsel, I do not want the assumption to remain in the record that this came from a file. It could well have come off a database.

Mr. WILSON. It could, and I was actually going to follow up and ask that. It's entirely possible that this is printed off of a computer database.

EXAMINATION BY MR. WILSON:

Question. And I'm just trying to get any elucidation on whether—in your case, I asked you earlier whether you kept signed correspondence; and you provided the answer for that. Do you know whether database files were purged in your computer system on a regular basis or whether they were retained just as a default mechanism in the computer system?

Mr. LU. Are you asking him whether he purged them or whether the system——

Mr. WILSON. No, no. Whether they were purged as a default mechanism of the computer system. Not whether Mr. Swiller had any part in doing any purging of any memorandum.

Mr. PIERSON. Do you understand that the question is asking whether it was done as part of a default mechanism? Not whether somebody came in and sat down and did it but whether the system had a purging mechanism within it?

The WITNESS. Not that I'm aware of.

EXAMINATION BY MR. WILSON:

Question. Do you have any knowledge of a meeting between Ambassador—between Chairman Fowler, John Huang and Ambassador March Fong Eu in April of 1996?

Answer. No, I don't.

Question. Did you ever receive any requests from Ambassador March Fong Eu?

Answer. No, I did not.

Question. Did you have any contacts with Ambassador March Fong Eu?

Answer. I met her in 1992 during the campaign; but, following, I don't think I ever saw or spoke to her again following the '93 Inaugural.

Question. Did you ever have any contacts with an individual named David Lai, L-A-I?

Answer. No.

Question. Do you know Joe Giroir?

Answer. I know who he is.

Mr. PIERSON. Have you met him?

The WITNESS. I believe I have met him.

EXAMINATION BY MR. WILSON:

Question. Did Mr. Giroir ever contact you at the DNC?

Answer. Never.

Question. Have you ever met either Nora or Gene Lum?

Answer. I have not.

Question. Have you ever had any contacts with Nora or Gene Lum?

Answer. I have not.

Question. Are you——

Answer. Let me correct—may I?

Question. Certainly.

Answer. I may have—I knew their names because they had at some point before my return to the DNC—being trustees of the party, as I did with a lot of people who had stopped contributing, I frequently sent them requests to renew their contributions to the DNC. So I may—at some point, they would have been included in

that correspondence. But I had no conversations with them, no follow-up conversations, and never spoke with them directly.

Question. Do you know an individual named Al Wong, W-O-N-G?

Answer. I do not.

Question. Do you know an individual named Ray McClendon? That's M-C, capital C, L-E-N-D-O-N?

Answer. The name is familiar. I believe he's a member of a firm that was supportive of our efforts, but I don't know him.

Question. Do you recall any specific contacts between yourself and Mr. McClendon?

Answer. No, I do not.

Question. Do you know James Staffors, who is with the company, American Home Products?

Answer. I don't know him. I know that they were trustee-level contributors. I don't recall ever meeting him or ever having any conversations with him.

Question. Do you recall any requests that came from either Mr. Staffors or any other employee of American Home Products of you or your office?

Answer. No, I do not.

Question. Have you ever met James Belcher?

Answer. I have never met him.

Question. Mr. Belcher is with a number of companies. One is called Peat Rubber Company. Another is called N. R. Latex. Do you know of any contacts between Mr. Belcher and either yourself or your office?

Answer. He became a trustee level contributor while I was at the DNC, so I assumed he received the similar correspondence that other trustees received after he became a trustee.

Question. Did either Mr. Belcher or any other member of his—any of his firms contact you with any manner of requests in either 1995 or 1996?

Answer. No.

Let me correct that. A gentleman named Chris Martin, I was introduced to by an attorney of his, and he requested of me information about the trustee program, which I discussed with him, with Mr. Martin.

Question. Did Mr. Martin contact you?

Answer. A trustee in Connecticut introduced us. She introduced me to Mr. Martin under the pretense that he was interested or had a client that was interested in becoming a DNC supporter.

Question. Where were you introduced to Mr. Martin?

Answer. At the home of Sandra Murphey and Bill Bryant in Connecticut.

Question. What was the circumstance of this meeting?

Answer. They were hosting a fund-raiser for Senator Kennedy. They invited me to come so that—I had known Mrs. Murphey for a few years and her husband. She was—they were active contributors as well as fund-raisers. They invited me there because they thought that Mr. Martin had a client who would be interested in participating as a trustee and being that I was their trustee liaison, they thought it would be proper to make that introduction.

Question. Did Mr. Belcher or one of his companies ultimately become a trustee participant?

Answer. Yes.

Question. Did you receive any communications about any of Mr. Belcher's enterprises subsequent to Mr. Belcher becoming a trustee participant?

Answer. Not that I recall specifically, no.

Question. Did you receive any requests regarding Mr. Belcher from any Congressional staff?

Answer. Can you restate the question?

Question. Did you have any contacts regarding Mr. Belcher or Mr. Belcher's enterprises with Congressional staff?

Answer. Following the election, I was contacted by members of Senator Dodd's staff, because there had been some concerns raised that Senator Dodd was involved in soliciting contributions from Mr. Belcher, and they were asking me sort of what I knew about Mr. Belcher and the history. That was the only Congressional contacts I think I had regarding that.

Question. What did you tell them?

Answer. As I recall, I had this first introduction with Mr. Martin, followed up with a phone call, maybe more than one phone call, which were not returned. And subsequently, not through any contacts of mine, Mr. Belcher became a trustee, and I never spoke to Mr. Martin or Mr. Belcher again.

Question. Did you make any telephone calls or write any letters or make any communications whatsoever on any matter that pertained to any of Mr. Belcher's enterprises?

Answer. No, not that I recall.

Question. Do you know who solicited the contributions from Mr. Belcher?

Answer. My recollection is that Mr. Huang did.

Question. And do you know anything about Mr. Huang's solicitation of this contribution?

Answer. No.

Question. Do you know whether Mr. Huang traveled to Connecticut to speak with Mr. Belcher?

Answer. I did not know it at the time, but as I just stated, I had some conversations about sort of how Mr. Belcher became involved. In that I found out Mr. Huang made that travel to Connecticut to meet with Mr. Belcher.

Question. Did you have discussions with Mr. Huang about the solicitation of a contribution from Mr. Belcher?

Answer. The only conversation I can recall is subsequent to an initial contribution from Mr. Belcher, I remember just acknowledging to Mr. Huang that I had met and associated with Mr. Belcher and Mr. Martin, and that that was the extent of my contact, serving knowledge that I guess I was encouraged that he finally made a contribution.

Question. Did anybody—you mentioned one Congressional contact. Prior to your leaving the DNC in March of 1997, had anybody else contacted you about Mr. Belcher or Mr. Belcher's companies?

Answer. No, not that I recall. No.

Question. Have you heard of the Ellicott Machine Corporation?

Answer. That is not familiar to me, no.

Question. Or the principal of the Ellicott Machine Corporation, the CEO is a person named Peter Bowe, B-O-W-E. Do you know Mr. Bowe?

Answer. No, I don't.

Question. Do you know Mark Nichols?

Answer. Yes, I do.

Question. And when have you met Mr. Nichols?

Answer. I have.

Question. Where did you first meet Mr. Nichols?

Answer. At a DNC gala, I believe.

Question. Do you remember when that was?

Answer. I don't.

Question. Have you ever met with Mr. Nichols at the DNC?

Answer. No, I have not.

Question. Have you ever met with Mr. Nichols outside of social circumstances such as the DNC gala or fund-raising event?

Answer. I have not.

Question. Do you recall ever having helped Mr. Nichols set up meetings with any Clinton Administration employees?

Answer. No, I do not.

Question. Have you had any contacts with Mr. Nichols outside of the social meeting you described at the very beginning of this line of questions?

Answer. I happened to have run into him at a DSCC event recently while I was in California, where it was a social visit. But I barely—I don't recall it.

Question. Did you have any discussion with him at that time?

Answer. Yes, I did.

Question. And what did you discuss?

Answer. He—actually I recall now he requested of me if I could assist him in getting a photo of himself from an event with the President that took place in Los Angeles that I had actually worked on, which would be another event where I saw him, a fund-raiser in the fall of '96, and he had remembered that—he remembered that he hadn't received a photo, that I was at the event, and he asked if I could assist in getting him a photo.

Question. Did you attend any meetings with Mr. Nichols and Chairman Fowler?

Answer. Not that I recall, no.

Question. Are you aware of meetings between Mr. Nichols and Mr. Fowler?

Answer. I can recall that he, Mr. Nichols, came to the DNC, but who he met with, I don't recall if it was Mr. Fowler or not.

Question. Earlier I asked you if you knew Mr. Patrick O'Connor, and you indicated that you did. Did Mr. O'Connor ever have any conversations with you about tribal, Indian tribal gaming concerns in Wisconsin and Minnesota?

Answer. He did not.

Question. Did you ever have any discussions with Mr. O'Connor about any Indian tribal concerns?

Answer. No.

Question. Did Mr. O'Connor ever ask for your assistance on any matter?

Answer. No, he did not.

Question. Prior to November of 1996, were you aware of any litigation involving a Chippewa Indian tribe in Wisconsin and Minnesota?

Answer. I was not.

Question. Were you aware, and again prior to November of 1996, that Chairman Fowler had been threatened with a subpoena and a lawsuit involving Indian tribal issues in Wisconsin and Minnesota?

Answer. No, I was not aware of that.

Question. Was there anybody at the DNC who was the principal contact between the DNC and Native American campaign contributors?

Answer. No, not that I recall.

Question. Do you remember any DNC fund-raisers being in contact with Native American fund-raisers, or Native American contributors?

Answer. I had some contact with some, and I don't—I think other staff fund-raisers in the field did, yes.

Question. Did any Native American tribal representatives become trustees or managing trustees?

Answer. Yes.

Question. Do you recall who they were?

Answer. Well, I think Mr. Nichols or his tribe contributed. Skip Hayward, who represented the Mashantucket Pequot tribe. The Sioux, the Saint Sioux tribe in Minnesota. I don't recall at this time other tribes, but there may have been a few others that contributed at the trustee level.

Question. Did you ever receive any requests from any of the individuals that you have just mentioned?

Mr. PIERSON. Of any kind?

EXAMINATION BY MR. WILSON:

Question. Of any kind.

Answer. Yes. Mr. Hayward had a representative, or his tribe had a representative named Chris McNeil in Washington, who I remember requested a meeting with chairman—through me with Chairman Wilhelm, and I can remember I attended, and with Chairman Fowler.

Question. Do you remember what the meeting was about?

Answer. The first meeting with Wilhelm?

Question. Yes.

Answer. I remember they described the success of their casino, how they had—I remember what sticks out in my mind is that they referenced a number of like $140 million they had written to the State of Connecticut because they are a tribe. I remember their concern that they felt that they did not have a contact in the White House who was well versed on Indian, Native American, Indian concerns and issues.

Question. And referring to the second meeting that you mentioned, what was discussed at that meeting?

Answer. I remember there being some follow-up to the original meeting, feeling that they had been supporters, but that these concerns that they laid out earlier had still not been addressed, that there were not people who understood their concerns.

Question. Did you ever have any contacts with Tom Collier, either when he was Secretary Abbott's chief of staff or when he was in private practice in a law firm in Washington?

Answer. The name is familiar, but I don't recall contacts with him.

Question. Have you ever had any contacts with a woman named Gretchen Lerach, L-E-R-A-C-H?

Answer. She was an employee at the DNC part of the time that I was at the DNC, yes.

Question. Who did Ms. Lerach work for?

Answer. My recollection is that she served as an assistant to the chief of staff, B.J. Thornberry, when she was employed at the DNC.

Question. Do you know whether she was still employed at the DNC when you left in March of 1997?

Answer. No, I believe she left previous to my departure.

Question. Did you have any knowledge prior to November of 1996 that Indian tribes were considering forming a PAC to advance tribal issues?

Answer. No, not that I recall.

Question. Do you know an individual named Richard B-E-R-T-S-C-H, Bertsch?

Answer. Yes, I do.

Question. Who is Mr. Bertsch?

Answer. He was someone who was involved in politics and some fund-raising in Los Angeles.

Question. Have you met him personally?

Answer. Yes, I have.

Question. When did you first meet Mr. Bertsch?

Answer. I believe I recall him screaming at me at a fund-raising gala at the Washington Hilton, and I think that gala was in the spring of '94. That was my first introduction.

Question. And what facilitated the manner of introduction?

Answer. I believe he didn't like his seating and felt I was responsible or I was the closest staff person to him at the time.

Question. Did you ever—have you ever solicited contributions from Mr. Bertsch?

Answer. No, not that I recall. No.

Question. Have you ever either yourself or have any of your staff conducted background research on Mr. Bertsch?

Answer. No, not that I can recall.

Question. Did Mr. Bertsch ever request that you provide assistance in setting up a meeting between himself and any member of the Clinton Administration?

Answer. No, not that I can recall.

Question. Do you know Richard Park?

Answer. Yes, I do.

Question. When did you first meet Mr. Park?

Answer. I believe he was accompanying Mr. Bertsch at that first fund-raiser that I described earlier.

Question. Have you ever solicited contributions from Mr. Park?

Answer. Yes, I have.

Question. Have you ever conducted any background research or any of your staff members conducted background research on Mr. Park?

Answer. No, not that I can recall.

Question. Has Mr. Park ever contacted you to request your assistance?

Answer. When I was at the DNC?

Question. When you were at the DNC, right.

Answer. No, not that I can recall.

Question. Do you recall ever helping to arrange meetings for Mr. Park with any Clinton Administration officials?

Answer. No, I don't.

Question. Are you aware that the President attended a series of coffees held at the White House during 1995 and 1996?

Answer. Yes, I am.

Question. Do you know whether the coffees were a part of the DNC's major donor program?

Answer. No, they were not.

Question. They were not. Did you ever send out any correspondence or information to any of the managing trustees or trustees about presidential coffees?

Answer. We had—regarding coffees? No, not that I recall.

Question. Did you ever have any contacts with any of the trustees or managing trustees about presidential coffees?

Answer. Yes.

Question. And what were the circumstances of those contacts?

Answer. As I stated earlier, the President attended a number of coffees. From time to time, I had the opportunity to include long-standing supporters or people that I thought would be potential supporters in those coffees. So I would invite them to attend a certain coffee.

Question. And mechanically speaking, how would you go about inviting the individual?

Answer. Over the phone, through a phone conversation.

Question. Would you follow up that telephone conversation with a letter?

Answer. We would sometimes follow up with a fax explaining where to enter the White House and also requesting them to fax back social and date of birth information for them to be waved into the White House.

Question. Did you discuss your intention to contact people about coffees in advance of your contacting them with anybody else at the DNC?

Answer. Yes.

Question. Who would you discuss those people with?

Answer. Frequently with Mr. Rosen, Mr. Sullivan, Ms. Braziel. Those are probably the majority of the contacts.

Question. Did you ever provide anybody else in the DNC with a list of suggested attendees for coffees?

Answer. Others than I mentioned?

Question. Well, actually, no, I am including those people. Did you provide them with a list——

Answer. Of prospective invitees?

Question. Exactly.

Answer. Yes. I would provide on occasion a list to Mr. Rosen or Mr. Sullivan about some people that I would want to include.

Question. And this would be in the form of a written memorandum?

Answer. Yes.

Question. Did you keep copies of such memoranda in your files?

Answer. No, I don't think I kept printed copies. As I talked about earlier, they were saved automatically on the computer.

Question. Do you recall whether your suggestions were generally accepted?

Answer. I think generally they were, yes.

Question. Did you attend any of the White House coffees?

Answer. Yes, I did.

Question. Do you recall the occasions that you attended coffees?

Answer. I believe I attended one coffee that was attended by the President and Vice President in August of 1995.

Mr. PIERSON. You are talking about White House coffees now, right?

Mr. WILSON. Yes.

EXAMINATION BY MR. WILSON:

Question. And do you recall any of the other attendees at that coffee?

Answer. Mr. Fowler was there. Truman Arnold, who at the time was the finance chairman, was there. I remember Gail Zappa was in attendance, Carol Penskey, Bill Doctor. I believe Rich Keating. Those are the names I remember. There would be I think about a dozen people all together.

Question. When you compiled lists of suggestions for coffee attendees, did you have any criteria that you went by to assist you in putting a name on the prospective list?

Answer. I tended to put people on who had been long-standing supporters. I viewed it as quite an awesome event to go to, so I would allow people who had been with the DNC and trustees for a long period of time. Those were the names I tended—my personal criteria for putting them on the list.

Question. Did you ever suggest to any individuals that were ultimately invited, and that you had suggested, that they should make a campaign contribution in association with attending the coffee?

Answer. No, I did not.

Question. Do you know whether the individuals that you suggested as attendees of the coffees ever received formal invitations from either the DNC or the White House to attend the coffee?

Answer. My recollection is they did not receive formal invitations.

Question. I provide for the witness a document marked Exhibit AS–17, which is marked EOP 035478, dated September 28, 1995, and it appears to be a list from a computer database that is not addressed to anybody in particular.

Answer. I don't think it is a list.

Question. I mean it provides fields, entry of data, for an addressee. It is not an actual letter that went out to anyone.

[Swiller Deposition Exhibit No. AS–17 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. I show you this to ask you if you have seen letters like this that have gone out to coffee invitees?

Answer. Not like this, no. As I stated earlier, the letters we would send were in the form of a memorandum indicating where they should enter. I don't recall sending a formal letter like this.

Question. Was there anybody at the DNC that was responsible for issuing the invitations or collecting information from the individual invitees?

Answer. At the DNC?

Question. Yes.

Answer. It tended to be myself and Ann Braziel.

Question. Did you have any—do you have any knowledge that any individuals at the DNC were linking attendance at a coffee with a contribution of any sort?

Answer. No, I don't.

Question. I provide the witness with an exhibit marked AS–18.

[Swiller Deposition Exhibit No. AS–18 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. This is premarked with a Bates Number DNC 3098456. If you would take just a moment to look at that. This appears to be a call sheet. It is not specifically addressed to an individual. It is prepared by Ann Braziel.

Do you recall call sheets of this nature being prepared?

Answer. Yes, I do.

Question. Did you discuss with Mr. Braziel—with Ms. Braziel call sheets of this nature?

Answer. Yes, I did.

Question. And did you discuss with her language that is set out at the bottom, the reasons for call. Here it indicates that an individual is interested in participating in convention but is not sure about membership. Ask them to begin renewal of his trustee membership at 25 K and attend the coffee with the President on, and three dates are listed.

Were you aware of any situations where when calls were made, attendance at coffee was linked with renewal of trustee membership?

Answer. I don't have knowledge of that.

Question. Did you ever discuss with Chairman Fowler the relationship between membership or being included in the trustee program and attending coffees?

Answer. He knew that in my role I included trustees in those coffees, so the participation of trustees was sort of a natural thing for us to discuss, because they were the donors I worked with.

Question. You mentioned before that you tended to include long-standing trustees as possible invitees to coffees. How would you determine what would qualify as a long-standing trustee contributor to be included in your list of invitations?

Answer. Their length of time for when they contributed. If they had been a contributor for two years, a year. People that got involved more close to the date of a coffee, I would move them sort of towards a later date. People who had been continual contributors, renewing every year, were my first priority.

Question. And did you have a cutoff in your own mind as to years of participation for inclusion in the list of potential attendees that you submitted?

Answer. No.

Question. Did you ever receive information, financial information, that projected income for coffees that the President attended?

Answer. No, I did not.

Question. Did you ever receive any spreadsheets or financial data that listed coffees?

Answer. Not that I recall, no.

Question. Do you have any recollection of receiving any types of financial data or spreadsheets, apart from that which we have already discussed, which were the lists of trustees that could be generated at your request?

Answer. No.

Question. No.

Answer. Not that I recall, no.

Question. Did you ever have any discussions with your colleagues about financial projections for coffees or indications of money received from coffees? And I refer exclusively to before November of 1996.

Answer. No, not that I recall.

Question. Are you aware of whether the Vice President hosted coffees for DNC supporters?

Answer. Yes, he did.

Question. Did you ever submit any lists of suggested attendees for those coffees?

Answer. I did.

Question. And what criteria did you use to determine who you would put on the list?

Answer. Similar criteria. I tended to defer to, in the case of coffees with the Vice President, contributions that were not made by the individual, but if there was like a Washington representative of a company that had been a long-standing contributor, that is where I tended to include them on the list.

Question. Have you ever heard of the term of art "servicing" used in conjunction with either presidential or vice presidential coffees? And, if so, do you know what it means?

Answer. I have heard the term "servicing."

Mr. PIERSON. Have you heard it applied though to coffees?

The WITNESS. Yes.

EXAMINATION BY MR. WILSON:

Question. And do you have an understanding of what the term "servicing" means?

Mr. PIERSON. As applied to coffees?

EXAMINATION BY MR. WILSON:

Question. As applied to coffees.

Answer. It would mean an opportunity to include donors at an event where the President would be attending and it would not be a fund-raiser.

Question. Have you ever seen any lists of coffees where the term "servicing" is applied to one of the presidential or vice presidential coffees?

Answer. I don't recall such a list.

Question. Do you recall ever having discussions with any of your colleagues as to whether either a presidential or vice-presidential coffee would be designated as a servicing event?

Answer. No.

Question. There was a coffee on May 13, 1996, that included a number of prominent bankers. Did you submit any suggestions or names for that particular coffee?

Answer. I did not.

Mr. PIERSON. Counsel, it is now about 4 o'clock. I would like to ask on the record counsel for the Minority whether they will have any examination based on how the testimony is going so far?

Mr. LU. I think we will, yes.

Mr. PIERSON. Can you give me an estimate of how long?

Mr. LU. At this point, 15 to 20 minutes maybe, possibly a little bit more, a little bit less.

Mr. PIERSON. Okay. I haven't talked to Mr. Swiller about how he is feeling, but I am getting weary. I am just writing notes. What I would like to do is take about a 2 or 3-minute break and go until 5 o'clock, and whatever line of questioning you have at that time we would be happy to let you finish, and let the Minority do some questioning. Unless it opens some area that is legitimate for you to pursue, I would like to end.

Mr. WILSON. I am in agreement to continue on after a short break. I hope I can wrap up within the next hour. I can't make any representations to that.

Mr. PIERSON. Fair enough.

[Brief recess.]

EXAMINATION BY MR. WILSON:

Question. Back on the record, please.

Did you ever have any interaction with Harold Ickes?

Answer. No, I did not.

Question. Did you ever place any calls or make any contacts with Mr. Ickes' office?

Answer. Yes, I did.

Question. And what were the circumstances?

Answer. I believe I spoke with an assistant to him, John Sutton. I think it was regarding a tour request that he was going to do for some contributors, supporters.

Question. That Mr. Sutton was going to——

Answer. Yes.

Question [continuing]. Organize for contributors? Did you ever——

Mr. PIERSON. You have to speak audibly.

EXAMINATION BY MR. WILSON:

Question. Did you ever have any contacts with Janice Enright?

Answer. Socially, but not that I recall in her office, work.

Question. Did you make any requests of her?

Answer. No, not that I recall.

Question. Do you recall whether she made any requests of you?

Answer. No, I do not recall any.

Question. Did you ever prepare call sheets for the President, Vice President, First Lady or Vice President's wife?

Answer. I believe I prepared call sheets for the President and Vice President, yes.

Question. And——

Answer. I did.

Question. And how did you determine who would be put on call sheets?

Answer. In discussions with Mr. Sullivan and Mr. Rosen.

Question. Did you keep track of the results of what happened after call sheets were sent out?

Answer. Yes, I did.

Question. How did you do that?

Answer. We had a binder in the office that had copies of call sheets, and at the front of it was a spreadsheet that indicated if a call was made and what the response was.

Question. And was the binder divided into sections depending on President and Vice President, First Lady, or who the person to make the call was?

Answer. Since there were only calls to my knowledge made by the Vice President, it was all calls referring to him.

Question. And who generated the spreadsheet that you refer to as being at the front of the binder?

Answer. Ms. Braziel.

Question. When you provided call sheets through the Vice President, did you provide any additional instructions or materials in addition to the one-page call sheet?

Answer. Not that I recall, no.

Question. I provide for Mr. Swiller a document marked Exhibit AS–19, which is marked as a DNC call sheet for Vice President Gore.

[Swiller Deposition Exhibit No. AS–19 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. It has been premarked with the Bates number EOP 049239. It is dated December 1, 1995.

Do you recognize the handwriting at the bottom of the page?

Answer. It looks like it could be the handwriting of Anne Braziel.

Question. And if you could, please tell me how the call sheets were treated once they were sent out? Did you request the calls be made by a certain time?

Answer. No, I did not.

Question. How would information as to whether the calls had been made or not made be transmitted back to your office?

Answer. It generally tended that a gentleman named Peter Knight would assist in that. He would provide information if calls were made or not.

Question. Did you ever discuss with Peter Knight the call sheets and fund-raising efforts made pursuant to the call sheets?

Answer. Yes, I did.

Question. What did you discuss?

Answer. In regards to the call sheets?

Question. Yes.

Answer. He would inform me if a call was made, if the Vice President connected with the individual who the outreach was made to, what the result of that call was, if it was favorable or not favorable.

Question. And do you recall whether he contacted you exclusively, or did he sometimes contact Ms. Braziel?

Answer. I think he sometimes contacted Mr. Sullivan, but I think he generally contacted myself and talked to me.

Question. This particular call sheet lists as a reason for the call to ask an individual to contribute an additional $50,000 to the DNC Media Fund.

What was the Media Fund?

Answer. It was a similar internal campaign line of funds we were trying to raise. I don't think there was a separate account for it, and I think it was just internally attracting that we were doing.

Question. Did you receive copies of separate accounting for funds that had been raised in the Media Fund?

Answer. Not that I recall, no.

Question. Did you ever suggest to any individuals that they make contributions to not-for-profit organizations?

Answer. If individuals were interested in organizations that were not-for-profit, there were times when I would offer them names of such organizations.

Question. Did you keep a list of names of organizations that were not for profits that you suggested people to contribute to?

Answer. I did not.

Question. Did you have a memoranda that you could provide for people with names and addresses?

Answer. Not that I recall, no.

Question. When you made suggestions to individuals about a particular not for profit to which they might contribute, did you verbally tell them what the organization was and other information about the organization?

Answer. That is correct.

Question. Did you ever keep any records of whether people you discussed not-for-profit contributions with actually did contribute to the not-for-profit group?

Answer. I don't recall a separate recording for that, no.

Question. Do you recall whether there was an accounting of any sort within the DNC that kept track of contributions made to not-for-profit organizations?

Answer. Not that I am aware of.

Question. Did you ever see any spreadsheets that listed not-for-profit contributions?

Answer. No, I did not.

Question. Did you keep any information in the trustee files about whether individuals made contributions to not-for-profit organizations?

Answer. I may have, but I don't recall any specific.

Question. You suggested earlier you would provide the names of organizations to which contributions could be made. What are the names of those organizations?

Answer. The ones I recall are the William Randolph Black Coalition for Black Voter Participation, the A. William Randolph Coalition for Black Voter Participation, and I think there was another organization called Vote '96.

Question. Did you ever suggest individuals make contributions to an organization called Defeat 209?

Answer. No, not that I recall.

Question. Did you ever suggest individuals make contributions to an organization called Participation 2000?

Answer. No, not that I recall.

Question. Why did you ask individuals or corporations to give gifts to not-for-profit organizations?

Answer. I never asked them to.

Question. Is it fair to characterize what you said earlier that you merely responded to their questions of who might I contribute to for a not-for-profit contribution?

Answer. That is correct.

Question. Have you ever met an individual named Warren Meddoff?

Answer. No, I have not.

Question. Have you been contacted about a possible contribution from Mr. Meddoff prior to November 1996?

Answer. By whom?

Question. By anybody. Prior to November of 1996?

Answer. Mr. Fowler contacted me about it.

Question. And what did he ask you or tell you?

Answer. He asked if I had heard the name Meddoff, or I believe there was another individual working with him who had indicated that they may make a large contribution to the DNC. Mr. Fowler was concerned because of the size of the contribution and the timing of the contribution and the fact that Mr. Meddoff was not known to myself and other individual fund-raisers at the DNC. He had some suspicions about their motives, their sincerity, and whether they were for real or not.

Question. What did you tell Mr. Fowler?

Answer. I told him that I did not know Mr. Meddoff. I don't recall the company he represented himself aligned with, but I didn't know that either. As I said earlier, there was another gentleman involved, and I did not know that gentleman either.

Question. Did Mr. Fowler ask you to do any research on Mr. Meddoff or Mr. Meddoff's associate?

Answer. Yes. They sort of I guess indicated that they were in the financial field, so he asked that I call, if I could request of donors who were also in the finance field if they knew of these individuals.

Question. And did you make calls to——

Answer. I recall two calls that I made, yes.

Question. Who did you call?

Answer. A gentleman named Steven Rattner, and a gentleman named Elliott Wolk.

Question. The spelling of the second gentleman's name is?

Answer. W-O-L-K.

Question. And what did they tell you about Mr. Meddoff?

Answer. Neither of them had heard of him or the company which they represented.

Question. Did you communicate this to Mr. Fowler?

Answer. I did.

Question. And did he ask you to do anything else?

Answer. He did not.

Question. Did you have any—did you receive any requests from anybody outside of the DNC about information pertaining to Mr. Meddoff prior to November of 1996?

Answer. No, I—no.

Question. Do you know whether the DNC ever provided a list of Chinese American trustees to anyone at the Taiwan Economic and Cultural Representative Office in the United States?

Answer. Not to my knowledge.

Question. Do you know an individual named Andrew Hsi, spelled H-S-I?

Answer. I do not.

Question. Have you ever had any contacts with Andrew Hsi?

Answer. No, I have not.

Question. Do you know an individual named Steve Boyd?

Answer. Yes.

Question. Has Mr. Boyd ever asked you to provide a list of trustees to him?

Answer. Not that I recall, no.

Question. Do you know whether Mr. Boyd asked you to provide a list of trustees to anyone else?

Answer. Not that I have any recollection of.

Question. I provide the witness with a document which has been marked Exhibit AS–20.

[Swiller Deposition Exhibit No. AS–20 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. It has been Bates marked DNC 1761511. It is a memorandum to Ari Swiller from Matt, dated April 21, subject, loose ends. If you can take just a moment to review this document.

Answer. Okay.

Question. Do you know who the individual was, "Matt," at the top of the memo is?

Answer. Yeah. It's Matt Gobush.

Question. Do you recall ever having seen this memo?

Answer. Yes, I do.

Question. Referring to the last bullet mark paragraph of the memorandum, it states that "Steve Boyd has requested a list of Chinese-American Trustees for Andrew Hsi of the Secretariat of Taiwan per the request of Jim Brady, DNC Vice Chair."

Do you recall having any conversations about Mr. Boyd requesting a list of Chinese-American trustees?

Answer. I don't.

Question. Do you remember having seen this at the time that the memorandum was given to you?

Answer. I——

Question. This statement.

Answer. This statement. I don't have a recollection of it, but I remember seeing a memorandum.

Question. Did you ask Mr. Gobush for further information about this, the request about a list of Chinese-American trustees for the Secretariat of Taiwan?

Answer. Not that I recall.

Question. Did Mr. Gobush provide any additional information to that which is in this memorandum?

Answer. Not that I can recall.

Question. Do you recall having any conversations with anybody or contacts with anybody about providing lists of trustees for somebody in the Secretariat of Taiwan?

Answer. No, I do not recall any.

Question. Do you know whether Mr. Gobush sent over such a list to the Secretariat of Taiwan?

Answer. Not to my knowledge.

Question. Do you recall whether at the time that this struck you as being an unusual request?

Answer. It strikes me now as one. I don't recall my reaction to it at that time.

Question. Have you ever provided a list of trustees to any organization outside of the DNC?

Answer. Not to my knowledge. I was very protective of the list.

Mr. WILSON. I've given the witness a memorandum which has been marked AS–21. It's premarked DNC 1781772. It's a memorandum dated April 24, 1995, to Steve Boyd from Mr. Swiller and Nancy Burke. It's re: Chinese-American trustees. This memorandum lists three—actually five individuals: Mr. Johnny Chung, Mr. Charlie Trie, Mrs. Wang Mei Trie, Dr. C.J. Wang and Dr. Mildred Wang.

[Swiller Deposition Exhibit No. AS–21 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. Do you recall ever having seen this memorandum?

Answer. No, I don't recall seeing it.

Question. Who is Nancy Burke?

Answer. She was my assistant on the trustee program after Mr. Gobush left. She worked at my direction.

Question. Did Ms. Burke and Mr. Gobush overlap in their terms of employment?

Answer. Maybe by a week as a transition period.

Question. Do you recall whether Ms. Burke ever discussed with you sending names of Chinese-American trustees to Mr. Boyd?

Answer. I don't recall the conversation, no.

Question. Referring back to the previous document, the date is not specific. It says April 21st, and a year is not included in the first document. The second document is dated April 24 of 1995. I believe April 21st is a Friday and April 24 is a Monday. Is there—.

The WITNESS. Excuse me one second.

[Witness and counsel confer.]

The WITNESS. Sorry.

Mr. PIERSON. Perhaps, counsel, it might be more useful if you're trying to fix the year to ask the witness if he recalls when Mr. Gobush was employed at the DNC.

EXAMINATION BY MR. WILSON:

Question. When was Mr. Gobush employed at the DNC?

Answer. He was employed at the DNC through—through the end of April, I believe, in 1995.

Mr. PIERSON. And he began at what time?

The WITNESS. He began in—about a year prior.

EXAMINATION BY MR. WILSON:

Question. Do you have a recollection of the month that he began his employment?

Answer. I don't.

Question. Okay. Who is Steve Boyd?

Answer. I believe he worked in the Office of the Secretary of the DNC.

Question. And what is the Office of the Secretary in the DNC responsible for doing?

Answer. I don't know. They are responsible for making sure that the Secretary of the DNC is well seated at all DNC events. Other than that, I think they maintain the bylaws of the party, but I'm not sure what their day-to-day responsibilities are.

Question. Did you receive other requests from Mr. Boyd—well I shouldn't say other requests. Did you receive any requests that you recollect from Mr. Boyd during your employment at the DNC?

Answer. Not that I recall.

Question. Do you know Anne Lewis?

Answer. I know who she is.

Question. Have you ever met her?

Answer. I believe I have, yes.

Question. Do you know Lynn Cutler?

Answer. Yes, I do.

Question. And do you know her personally?

Answer. Yes I do.

Question. Do you know of any donations—did you ever recommend donations be made to the Back to Business group.

Answer. No I did not.

Question. Were you ever part of any—of discussions wherein it was suggested the DNC donors made contributions to the Back to Business organization?

Answer. Yes, I believe I was—yes.

Question. And if you could, please describe those discussions.

Answer. I believe Ms. Cutler at some point made a request for some names that may be outreached to for that organization.

Question. Did Ms. Cutler make the request directly of you?

Answer. As I recall, yes.

Question. And how did you respond?

Answer. I did not respond.

Question. Did you send her any names?

Answer. Not that I recall.

Question. Did you suggest any names that she might contact?

Answer. Not that I recall.

Question. Do you recall in a general sense what you told her?

Answer. I think it—when she asked, I said I would look into it. But I remember feeling that it would be counterproductive to my efforts to raise money, so I—I don't recall her ever following up, so I didn't do any proactive follow up.

Question. When you left the DNC in March of 1997, or at any time previous to your leaving the DNC, did you sign a memorandum about the retention or non-destruction of documents?

Answer. Yes, I believe so.

Question. Do you know when you might have signed such a document?

Answer. Prior to leaving the DNC.

Question. Do you remember when—when the document was circulated for you to be signed?

Answer. Around the new year, December, January; maybe earlier.

Question. And do you recall signing this document?

Answer. I believe I did, yes.

Question. When you—in 1995, were you aware of a suggestion by campaign consultant Dick Morris about a large-scale media purchase for the end of 1995?

Answer. At that time, no.

Question. And I'm speaking specifically about that time.

Answer. No, I'm not.

Question. Did you become aware of such a suggestion at any time before November of 1996?

Answer. I became aware that the DNC was making large purchases of TV time. I don't know at what point that I became aware it was at his suggestion. I knew we were doing it, and when I became aware of that Mr. Morris was involved in that discussion, I can't recollect exactly when that was.

Question. Did you contact any of the trustee donors to provide additional contributions for media purchases at the end of 1995?

Answer. As I recall, no, there was no direct contributions made to direct media purchases. There was general fund-raising that was always at an increase because we always needed more money. As we started to, as I recall, buy more media time, our expenditures grew, so we were required to raise more money. I don't know that that—I can't recall directing anyone that their funds would go to media purchase, because I don't believe that that was ever the case.

Question. Do you know whether anybody at the DNC was involved in keeping track of funds or monies to be directed towards media purchases at the end of 1995?

Answer. Not that I have knowledge of, no.

Question. Do you recall whether there were any specific accounting systems set up to keep track of funds that might be expended in media buys at the end of 1995?

Answer. No.

Question. Did you have any involvement with funds being wired to State parties to implement media buys at the end of 1995?

Answer. I don't recall that.

Question. Did you have any direct contact with any State party officials in terms of providing contributions to the State parties from the DNC?

Answer. No. I don't recall speaking to State party officials.

Question. Were you involved in any discussions of sending DNC monies to State parties?

Answer. No, not that I recall.

Mr. PIERSON. May I hear the last question and answer, please?

[The reporter read back as requested.]

Mr. PIERSON. Excuse me just a moment.

[Witness and counsel confer.]

Mr. PIERSON. Are you asking for his discussion with anybody inside the DNC, any contributors, anybody in the world?

Mr. WILSON. Any——

Mr. PIERSON. Because he's already testified about the Tamraz situation.

Mr. WILSON. Correct. Any of the DNC colleagues.

[Witness and counsel confer.]

Mr. PIERSON. Start your question again, because I think he's thinking about something different than you're asking. So ask again if you would, please.

EXAMINATION BY MR. WILSON:

Question. Were you involved in any meetings or discussions with DNC colleagues about—about forwarding DNC monies to State parties?

Mr. PIERSON. What you're talking about is money that has gone into DNC accounts and thereafter would go to State parties?

Mr. WILSON. Correct.

The WITNESS. No.

Mr. PIERSON. Okay.

EXAMINATION BY MR. WILSON:

Question. Unfortunately, this is depressing for me to go back and look at the pile that I went passed earlier, but a couple of quick questions on a few more issues.

Mr. PIERSON. Far more depressing to us.

Mr. WILSON. I'm hoping to come within the last 4 or 5 minutes of my questioning.

Mr. PIERSON. Good.

Mr. WILSON. Maybe a little longer.

Mr. PIERSON. Good.

EXAMINATION BY MR. WILSON:

Question. Did you ever draft, suggest a list of DNC contributors to stay as overnight guests in the White House?

Mr. PIERSON. Do you mean did he ever propose names for overnight stays in the White House?

EXAMINATION BY MR. WILSON:

Question. Well, the first question is did you ever send the list or draft lists of suggested overnight guests at the White House?

Answer. I don't recall drafting it, no.

Question. Did you ever make suggestions of individuals to be overnight guests at the White House?

Answer. On occasion, yes.

Question. Do you recall specifically who you suggested as an overnight guest?

Answer. No. My recollection would be that there had been long-standing fund-raisers and trustees who have been significantly supportive throughout the years.

Question. And to whom would you communicate your suggestions?

Answer. I think initially I communicated suggestions to Ms. Hartigan and Mr. McAuliffe; subsequent to the transition, to Mr. Sullivan and Mr. Rosen.

Question. Did you ever communicate directly with the White House with suggestions of potential overnight guests?

Answer. No, not that I recall.

Question. Did you ever receive telephone calls or contact from the White House about suggested overnight guests?

Answer. No.

Question. Did you ever travel on Air Force One or Air Force Two?

Answer. No.

Question. Did you ever suggest individuals to travel on Air Force One or Air Force Two?

Answer. Yes, I did.

Question. And what criteria would you use to make such a suggestion?

Answer. Same criteria as I stated earlier: People who had been long-standing supporters or longtime fund-raisers of the party.

Question. And who would you communicate your suggestions to?

Answer. As I stated earlier, at first I—I would to Mr. McAuliffe and Ms. Hartigan; following the transition, to Mr. Sullivan and Mr. Rosen.

Question. Did you ever discuss requests for positions on boards or commissions with DNC donors?

Answer. Yes, I did.

Question. And who did—who did you discuss board or commission positions with?

Answer. I can't recall all the donors. I remember Ms. Betsy Cohen made a request about an inquiry. I think Elaine Shuster.

Question. Do you remember any other names?

Answer. I believe there may have been others that I spoke with about it but not coming to mind.

Mr. WILSON. I've given the witness a document which is marked Exhibit AS–22. It's been Bates marked DNC 3052822, memorandum to Mr. Swiller and Richard Sullivan from Eric Sildon and Jay Dunn, dated January 24, 1994.

[Swiller Deposition Exhibit No. AS–22 was marked for identification.]

EXAMINATION BY MR. WILSON:

Question. Do you recall ever receiving requests from the Commerce Department for potential board members?

Answer. No, I don't.

Question. Do you recall having seen this memorandum?

Answer. I do not recall it.

Question. Do you remember whether you ever submitted names of individuals as recommendees for the President's Export Council?

Answer. I don't recall it.

Question. Do you remember any—anybody following up on this request—any request for names to be submitted for the President's Export Council?

Answer. I don't recall it.

Question. Did you ever suggest that DNC donors attend White House movies?

Answer. No.

Question. Are you familiar with the term of art "White House database"?

Answer. Yes.

Question. Did you ever have access to any materials produced by the White House database?

Answer. Yes.

Question. And what materials did you have access to?

Answer. I remember—I didn't have physical access, but requesting of someone who had access to see whether certain people had been invited to certain events at the White House.

Question. And did you make a request to obtain this information?

Answer. Yes I did.

Question. And who did you make the request of?

Answer. A gentleman named Donald Dunn.

Question. And who is Mr. Dunn?

Answer. At that time he worked in the Office of Political Affairs at the White House.

Question. And did you make requests on more than one occasion of Mr. Dunn to provide this information?

Answer. Yes.

Question. What was the format of the information that he provided?

Answer. There was no format. He would—it was voice conversation.

Question. Is it fair to say that you provided him with a name, and he provided you an answer as to——

Answer. Correct.

Question [continuing]. Whether the person had or had not been invited?

Answer. Correct.

Question. Did you ever provide information to be included in the White House database?

Answer. Not that I recall.

Question. Did Mr. Dunn ever make requests of either yourself or staff in your office to provide any information?

Answer. Not that I recall.

Question. Do you recall speaking with Mr. Dunn on more than the one occasion that you just discussed?

Answer. I spoke to Mr. Dunn probably half a dozen times.

Question. And was it always for the same reason?

Answer. Some—no, at certain times I made a request of Mr. Dunn to provide a White House tour for family or individual donors.

Question. Did you ever receive any lists of names or information that was generated by the White House database?

Answer. I don't know if it was generated by the database, but I received a list of names from the Office of the Social Secretary.

Question. And what were these lists of names for?

Answer. On occasion they would request of us lists of possible invitees to events that the White House would be hosting. They would send back a response list.

Question. Do you know whether the DNC had an autopen for the President's signature?

Answer. My recollection is that we did not have one.

Question. Regarding materials that had the President's signature, and I'll ask you specifically about photographs that were signed by the President, when you were attempting to obtain photographs for people, who would you make your requests of?

Answer. For the photographs?

Question. Yeah.

Answer. Sometimes Mr. Dunn. There was a woman at the DNC that I worked with, a woman named Brooke Stroud, who would assist in obtaining photographs from the White House.

Question. Just a—I think my last question on this go-around, you mentioned at the very beginning when we were discussing Ernst & Young and the materials Ernst & Young prepared that you knew of an Ernst & Young individual who was a trustee. Who was that individual?

Answer. His name was Jeffrey Hershberg.

Question. And when did you meet him, or have you ever met him?

Answer. I have met him. I believe I didn't meet him until I returned to the DNC. He was already a trustee at that time. So subsequent to my return, beginning of 19—end of 1993, beginning of 1994.

Question. What was his job at Ernst & Young?

Answer. He was vice president—vice chairman was his title. I believe he directed the Washington office, lobbying office, for the company.

Question. Do you know if he is still an Ernst & Young employee?

Answer. When I left here 5 months ago, he was. I have not had contact with him in 5 months since I left, so today I do not know.

Question. How did you obtain your current job in California?

Answer. I knew an individual who was working with the same company who had the position basically as I have it now. And he was leaving the position to assume a different role and approached me about filling the position.

Question. And who was this individual?

[Witness confers with counsel.]

Mr. LU. Counsel, I don't know how much you're going to——

Mr. PIERSON. Just let him answer this question.

The WITNESS. The gentleman's name is Darius Anderson.

Mr. WILSON. Thank you very much. That concludes my round of questioning.

Mr. LU. Can we take just a quick 5-minute break while I confer with counsel?

Mr. WILSON. Can we go off the record for a second?

[Discussion off the record.]

[Brief recess.]

Mr. LU. Let's go back on the record.

Mr. Wilson, I—you're done with your questioning?

Mr. WILSON. Yes, I am.

Mr. LU. Okay.

EXAMINATION BY MR. LU:

Question. Mr. Swiller, on behalf of the Democratic Members of the committee, I want to thank you for coming in today. I realize this must have been a great burden on you coming from the west coast, but we appreciate your time.

Just a couple clarifying questions I want to ask you. Can you tell me again how many trustees or managing trustees there were at the DNC during the time you worked there?

Answer. It grew during the time I was there. By the time I was finished, or by the time in the '96 election, it was approximately around 800.

Question. About 800.

Mr. Wilson has asked you about a number of them today and a couple of more newsworthy ones. At the time that you worked at the DNC prior to November of 1996, had there been any news accounts about Johnny Chung, Pauline Kanchanalak, Charlie Trie?

Answer. Not that I recall, no.

Question. So at that time, you, prior to November 1996, you had no particular reason to pay special attention to correspondence that you received from them or requests that you received from them any more than from any other trustee?

Answer. That's correct.

Question. I would like to ask you to clarify the terms "trustee" and "managing trustee." When I think about a university having a board of trustees or a company having a board of directors, I have a sense that these people play a role in the day-

to-day operations of a university, a corporation, what have you, and especially when I think about the terms "managing trustee" or "managing director." My understanding, however, is that with regard to the DNC, the use of the term "trustee" and "managing trustee" is more of an honorary term. Is that consistent with your understanding?

Answer. No. My understanding is they are—the names were consistent with the level of contribution or level of funds raised for the party.

Question. Well, no, I think what my question was really getting at is whether those people had a role in the day-to-day operation of the DNC?

Answer. Absolutely not.

Question. With regard to Pauline Kanchanalak, I gather that she was a trustee at the time that you joined—you rejoined the DNC in December of 1993?

Answer. That's my recollection, correct.

Question. So from there on out, when you received checks from her that were P. Kanchanalak, you had no reason to believe that they were anything other than checks from Pauline Kanchanalak?

Answer. That's correct.

Question. I believe you also testified that you attempted to contact Mr. John Huang when he worked at the Department of Commerce; isn't that correct?

Answer. That's correct.

Question. Did you actually getting ahold of Mr. Huang that one time you tried to call him?

Answer. I never did.

Question. With regard to Johnny Chung, I believe you said when you visited him at his office in California in spring of 1995, you chuckled because you saw a whole wall full of photos that he had taken. You mentioned that there were some of Republican leaders. Did he tell you or did you ask him how he obtained those photos?

Answer. No, I don't recall that conversation.

Question. Did you have any understanding as to whether he had given money to the Republican Party or attended Republican fund-raising events?

Answer. Judging from the pictures, they were very similar to DNC-type staged pictures, so I assumed that—it was just an assumption on my own, but not a discussion—that they were—you know, that he received pictures like that at fund-raising events.

Question. When we spoke about Mr. Ruggiero, Mr. Joseph Ruggiero, you explained that had he complained that he had received much better treatment by the RNC in getting access to the Bush White House. And you—I believe you had mentioned some of the perks that he had received as a result of giving money to the RNC.

Other than your conversation, that conversation with Mr. Ruggiero or that understanding as a result of Mr. Ruggiero, do you have any understanding of the types of perks that the Republican National Committee offered to its large donors?

Answer. My understanding was that they included many more of their financial supporters at events at the White House, at small delegation meetings, meetings with Members of Congress much more frequently as a system of their fund-raising apparatus.

I also recall, when we were discussing the possibility of putting together a brochure for our trustees, we referenced the RNC Team 100 brochure, which, as I recall, had a picture of what they called a trade mission. It was a picture at the wall of China of approximately 50 people standing at the wall and indicated that, you know, their—through the RNC's efforts, these donors met with the highest-level officials in other countries.

Question. And did you gather from that photo that that RNC trade mission included officials of whether it be the Reagan administration or the Bush administration?

Answer. I couldn't draw that conclusion, no.

Question. Were you aware of any perks that the RNC offered to its large donors that the DNC did not offer to its large donors?

Answer. I don't recall ever having the opportunity to bring individual donors to the Oval Office to provide photos there. It was always joked about, and I don't know the truth of this, that the Republicans were much better at giving large contracts to their supporters than we, and we couldn't figure out how to do that, which I just took it as that and never looked into it or did anything to follow up if that was true.

Question. With regard to these—I think you said these meetings that—your ability to bring people to the Oval Office to meet with the President, I believe you had earlier testified that some contributors had asked you for—to set up meetings with the President and the Vice President, and you had declined those requests because you thought that was inappropriate?

Answer. That's correct.

Question. Okay. With regards to government boards and commissions, the fact that you or someone at the DNC submitted a name for a government board did not necessarily mean that the White House would accept that name; isn't that correct?

Answer. More often than not there was no response to my request, or the name was not accepted.

Question. In fact, when there's—typically when there's an opening on a government board or commission, many people both inside and outside the administration submit names for boards and commissions; isn't that correct?

Answer. That's my understanding correct.

Question. Mr. Swiller, the last set of questions I have for you are requested by Congressman Condit. He's asked us to ask these of all the witnesses that are testifying before us.

I believe you've told us that you've provided deposition testimony to the Senate; isn't that correct?

Answer. That's correct.

Question. And I'm curious, when you first learned that this committee wanted to take this deposition, did you wonder why you needed to be deposed again after you had already been deposed by the Senate?

Answer. Yes, I did.

Question. Can you estimate for me just very roughly what percentage of the questions you were asked today were also asked by the Senate?

Answer. 80 percent.

Question. 80 percent. And I also understand you've been interviewed by the FBI?

Answer. That's correct.

Question. And I gather a lot of the questions that the FBI asked were the same ones that have been asked today?

Answer. That's correct.

Question. Have you been notified of any other testimony that you're scheduled to give in the future?

Answer. Not yet.

Question. And I believe that when—I believe that you were at the DNC when some of the first congressional document requests were served upon the DNC; is that correct?

Answer. That's correct.

Question. Do you recall how much time you spent searching for documents at the DNC responsive to those requests?

Answer. Probably each request required half a day of work.

Question. Can you estimate a total of——

Answer. Four hours. I think there were three requests.

Question. Four hours for each request?

Answer. Right.

Question. Okay. And since you have left the DNC, have you spent any time searching for documents responsive to document requests?

Answer. I no longer have any documents.

Question. Other than the time that you've spent in this deposition, how much other time—well, actually let me stop that question.

In connection with this entire investigation, can you give me an estimate of how much time you have spent? And that would include the Senate testimony, the FBI testimony, your testimony here, all the preparation time, all the travel time, conversations. We'll leave it at that.

Answer. Probably 2 weeks of time.

Question. And I assume this is the time that you have not been able to spend at your job?

Answer. That's correct.

Question. Other than your time, this 2 weeks that you've said, have you—I've assumed you've incurred other expenses to come here, travel expenses, hotel expenses, things like that?

Answer. Most of the travel expenses have been incurred by the committees that have requested my presence, and the majority of the burden of my expenses has been placed on the DNC.

Question. And obviously there's the time off from work I gather?

Answer. Oh, yeah. I mean, that's probably the greatest expense, my lost time.

Question. And if it is available, will you seek reimbursement from this committee for your time?

Answer. Yes.

Mr. WILSON. I have nothing further. Thank you again for coming today.

The WITNESS. Sure.

Mr. PIERSON. Sorry for coaching.

Mr. WILSON. Thank you very much, Mr. Swiller.
Mr. PIERSON. Thank you, gentlemen.
[Whereupon, at 5:12 p.m., the deposition concluded.]

[The exhibits referred to follow:]

(2)

HI - no submission of names

Wiling: what were pressures for dropping?

DF — None. People doing it left & moved.

no will or consciousness/focus to replace

those people. Bridgetary

to retain Bainridge

William (# for Deleu)

Report at end of Dec

Supervised JH — Rosen / Sullivan

Conflict w/ Yu + JH

Hmly mtgs. Rosen, DF, BJT, RS,

HI, DS, Karen,

Natl Trans Adm Bd — $350K goal 170 members

"Symbolic" No real function

JN — wants list base

total raised? Wasserman (over $24)

When set up? early '96 NFB

Terry chair — who director? '94

must would have been flagged, not all

Hg goals, extra effort to make the goals

mistakes made were mistakes of process, no being

careful, thorough. Not the & result of

cavalier attitude & illegal donations

Problems of innocence not intent

DNC 3049787

EXHIBIT

AS-1

MEMORANDUM

TO: Richard Sullivan
Ari Swiller

FROM: Ann Braziel

DATE: <date>

SUBJECT: AR Fundraising

Mark Middleton spent some time with me and pledged to help in raising money. Most of his contacts will be raised into Trustee and Managing Trustee Councils, and he was also very interested in the Asian Pacific American Leadership Council. He also gave particular insight into Arkansas donors and targeting. Based on some database and prospecting lists, he made suggestions on calls for Truman, Joe Giroir, Paul Berry and Richard Mays. We also targeted donors and calls to make. Listed below are the results.

Truman Calls
John Allison
Bill Bowen
Charles Murphey
Mike and Beth Coulson

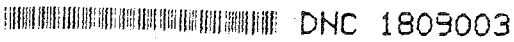
Joe Giroir Calls
Paul Berry
David Banks

Paul Berry Calls
Herbert McAdams

Richard Mays Calls
Ernest Joshua
John Walker

Other Calls:

San Angel	$5k
Bob Bogle	$10k
Mark Cambiano	$20k
Richard Hill	



Ben Hogan	DBC
Ret Hudson	Trustee
Bobby Hennriech	Trustee
Jack Williams	DBC
Ben Allen	NFC
E.J. Ball	NFC
Don Beavers	DBC
Richard Bell	DBC
Greg Brown	NFC
James Dyke	Trustee
Harry Erwin	numerous $1k
Dick Herget	DBC
Frank Higginbotham	DBC
Kaki Hockersmith	NFC
J.B. Hunt	Trustee
William Hurt	DBC
Percy Malone	DBC
Charles Morgan	DBC
Thomas Blaney	Trustee
Don Munro	Trustee
J.T. Rose	DBC
Charles Scharlau	DBC
Randy Warner	
Michael Wilson	DBC and raise

Raising Calls:
Linburn Carlisle
George Jernigan
Earl Jones
Sam Perroni

12/03/96 DNC Finance 9:09:15

Executive Summary

Mr. Charlie Trie

Mr. Charlie Trie
Daihatsu International
2224 Cottonbale Lane & 102 St.
Little Rock, AR 72202

W:
H:
T: President/Owner
O:
E: Daihatsu Internation
C: Jody Webb
E:

W:
H:
C: Business Council
Managing Trustees

S: Mrs. Wang Mei [redacted]
DOB: 8/15/49 SSN [redacted]

WRITTEN 1996 Total: 0 1995 Total: 0 INDIVIDUAL

Date	Amount	Comment	Solicitor	Fundraiser	
5/12/94	20,000	1994 HEALTH CARE CAMPAIGN	Mr. Richard Mays	Ari Swiller	F01
5/12/94	60,000	1994 HEALTH CARE CAMPAIGN	Mr. Richard Mays	Ari Swiller	N03

WRITTEN 1996 Total: 0 1995 Total: 0 COMPANY

Date	Amount	Comment	Solicitor	Fundraiser	
7/18/94	7,500	BC NATIONAL DINNER	Mr. Richard Mays	David Mercer	N01

RAISED

Name	Amount	Event	Date
Mr. Ernest Green	20,000	POTUS COFFEE 2/6/96	2/07/96
Mr. Ernest Green	30,000	POTUS COFFEE 2/6/96	2/07/96
Chy Corporation	10,000	AFRICAN AMERICAN LUNCHEON	11/16/95
Chy Corporation	10,000	AFRICAN AMERICAN LUNCHEON	11/14/95

Group I

PARTICIPATION

Date	Activity

EXHIBIT
AS-3

DNC 3078818

12/03/96 DNC Finance 9:09:21
Executive Summary

Mrs. Wang Mei Trie

W: F:
H:
T:
O: Self Employed
E: Daihatsu Intl Tradng
C:
E:

W: F:
H: (213) 454-2592
C:

S: Mr. Yah Lin Trie
DOB: 0/00/00 SSN:

WRITTEN 1996 Total: 0 1995 Total: 0 INDIVIDUAL

Date	Amount	Comment	Solicitor	Fundraiser	
6/03/94	20,000	1994 HEALTH CARE CAMPAIGN		Ari Swiller	F01

WRITTEN 1996 Total: 0 1995 Total: 0 COMPANY

Date	Amount	Comment	Solicitor	Fundraiser

RAISED

Name	Amount	Event	Date

PARTICIPATION

Date	Activity

EXHIBIT
AS-4

DNC 3078820

MEMORANDUM

To: Martha Shoffner

Fr: David L. Mercer

Dt: August 22, 1994

Re: Follow up to meeting with Charlie Trie

This is to follow up my meeting with Mr. Trie before he left for Beijing. Several issues were discussed. Below is a status report and suggestions for how we might handle the matters outlined below.

References for DC residence: Attached is letter I wrote on Mr. Trie's behalf and forwarded to the appropriate party. Mr. Mays is sending his letter out on August 23, 1994.

Video Tape of Presidential Gala: I have put a search out for the tape that included Mr. Trie. To date we have not been able to locate it. We will continue the search.

DNC Finance Committee Board of Directors: The request for the letter inviting Mr. Trie to serve on the finance board is forthcoming. The request has been made and is being processed. I meet with Mr. Terry McAuliffe on August 24, 1994 to close the matter and secure the letter.

Mission to China: The Commerce Department begins its mission to China on August 27, 1994. I received word that arrangements for receptions and other affairs were already handled through other sources. However, Mr. Trie will receive notification of the mission's activities holding open the possibility of participating in some of the events.

Personal Bio and Company Profile: I requested this information from Mr. Trie. If possible, please send me a package that includes bios, company profile or other pertinent and noteworthy documents.

Macau: Mr. Trie informed of business interests in Maucau. Again, please forward prospectus, company profiles and bios of the individuals participating in the ventures.

Schedule: To prepare for meetings upon Mr. Trie's return, please forward a copy of his schedule for when he will be in Washington, DC. We can then plan for his visit and make the necessary arrangements.

Confidential Information

EXHIBIT
AS-5

DNC 1275756

7-21

NOTES FOR ARI:

Ari--I count **Tom Hipple** with 7 rooms (4 RC and 3 WH)--is this correct?
Ann O'Conner has 3 WH and 3 FS--is this correct?
Ari--**Amy Rosen and Jim Desmond** both listed on Trustee list is this correct--should they both receive a credential package?
Lockheed Martin has 2-FS, 1-RC, 1SP (Rosen, Desmond, Chaudet) and Checchi has FS--is this ok?
Ari-**Owsley Brown and Kerry Skelly** both listed on Trustee list--is this correct--should they bothe receive a credential package?
Yarwood (Sun Mar Healthcare and American Health Care Association) **and Frank Johnson** (CEO, Sun Mar) are both listed on Trustee list--is this correct-- should they both receive a credential package?
⇒ **Charlie Trie** has 4 SP and 2 WH--is this right? I thought it was 4 total?
David Mercer told me that **Anhueaser** has 8 rooms with Pastrick and 3 or so with us.

NOTES FOR CAROLYN:

Otto Ruesch and Matt Ruesch should be switched--Otto should get the suite, son should get the room
Tommy Payne should be contact for RJR not Carol Cole (she left the company)
Has **Textron/Gordon Thomas** got Trustee housing or Renaissance?
Maria Elena Torano has sent in her form
Jack Moore attending--at Hyatt with Labor
Governor Gutirrez is attending convention but does not need housing
Maurinne Cogan IS attending (Marshall cogan listed as not attending) FORM
A Guest, **John Heller**, is attending for BOB ELKINS, please put him on for his credentials (Bob is listed as not attending)
Val Halamandaris--has he reserved Renaissance or Trustee hotels? Sen. Frank Moss
~~**Barbara Lindermann** is~~ in SP
✓ Who is **Scully** (sponsor)--Pricilla Ross is attending? C/G
Tamraz should be a double room--his daughter is now attending with him.
Joe Velasquez has 1 room at Sutton ← only of this 1 ; not 2
Who is sponsor **Wheeler** (Wallace Henderson attending)?

Confidential Information

0015575

BAN CHANG
INTERNATIONAL (USA), INC

FILE

MEMORANDUM

TO: Ari Swiller
DNC
FROM: Georgie Kronenberg
DATE: May 11, 1995

Subject: Lunch for Queen of Thailand

Ari, I know you are pushing very hard for Pauline to be on the White House guest list for the Queen's luncheon. Therefore, I would like to recap for you the history of Pauline Kanchanalak's involvement with the President's campaign and the DNC:

Pauline joined the campaign early on at the introduction of Esther Coopersmith. (Actually, she and her husband, Jeb, were the people who introduced Esther to Thailand almost ten years ago. Pauline and Jeb made arrangement with the palace for Esther and the Congressional delegation to have an audience with the King and Queen of Thailand. They made a similar arrangement for Esther and her group every year for six consecutive years and occasionally thereafter).

In addition to financial contribution, Pauline worked with minority groups, both Asian and non-Asian, during the campaign. She first became a Trustee of the DNC at the beginning of 1993 and became a Managing Trustee in 1994.

As you may know, Pauline's contribution to the DNC has been through the Women Leadership Forum (WLF) and has been very active in the WLF since its inception. She participates in the formulation of policy and activities of the WLF. She started working with WLF on the re-election strategy and activities.

Pauline has been a sponsor of the Easter Egg Hunt at the White House for the last two years (1994 and 1995).

She was recently invited to join the official delegation of Secretary Brown and Ambassador Kantor to the First Hemispheric Trade and Commerce Forum this July.

Pauline and her husband made an arrangement for the Queen to receive an Honorary Degree at the Georgetown University in 1992 and was involved in getting funding from Thailand for the Thai Exhibit at the Capital Children Museum and for the Museum itself. The funds also paid for the Exhibit to travel around the U.S.

On the non-political front, Pauline serves as a Trustee of the Washington International School.

F 0090590

WAS[illegible] Suite 630, 3000 K Street, N.W., Washington, D.C. 20007, USA Tel. (202) 337-5970 Fax (202) 33[illegible]-3025
BA[illegible] AUS, 1 Soi Sukhumvit 25, Khlongtoey, Bangkok 10110, Thailand Tel: (662) 260-6060 Fax (662) 260-6223

EXHIBIT
AS-7

Pauline is not a lobbyist and do not get paid to be involve in politics in the U.S. She did it because she believes in what the President has been trying do and to learn first hand about the democratic process.

Thailand is her birth place and U.S. her adopted country. She is the first and only Thai who is actively participating in all these mainstream activities in the U.S. It is symbolically very important to Pauline and myself that for once she is recognized for what she has done both as a Thai and a resident of the U.S. I believe her name would add prestige to the White House guest list.

Ari, as I have said before, it is very important to Pauline that she is on the White House list for this luncheon. Honestly, I cannot think of any worse insult to Pauline if her name was excluded from this lunch.

Again, thank you very much for all your help. Look forward to hearing good news from you.

P.S. On a different matter, please let me know the amount to reimburse you for the luncheon at the White House mess which Susan Levine has kindly organized for us.

Best regards.

MEMORANDUM TO THE FILE

From: Ari Swiller
Date: November 20, 1996
Re: Conversation with Pauline Kanchanalak

On November 14, 1996, I had a phone conversation with Pauline Kanchanalak while she was in Thailand. During the conversation, Pauline and I discussed the source of contributions to the Democratic National Committee (DNC) that were attributed to her. At that time, she stated that she had not made any contributions to the DNC and that all contributions came from her mother law, Praitun Kanchanalak. Pauline explained that this was an arrangement she had made with Vic Raiser during the 1992 campaign. I asked her if she had ever discussed that arrangement with anyone other than Mr. Raiser, specifically Richard Sullivan, Lauren Supina, John Huang or me. She clearly stated that she never indicated that contributions from P. Kanchanalak were not from her.

F 0018925

7/26/94 DNC Finance 10:10:
Executive Summary

Mr. John Huang

Mr. John Huang
Lippo Bank
711 West College Street
Los Angeles, CA 91207

W: (213) 625-8686 F: (213) 625-8554
H:
T: Vice Chairman
O:
E: Bank of Trade
C:
X:

W: (213) 625-8554 F:
H:
C:
S: Jane W. Huang
DOB: 4/14/45 SSN:

WRITTEN 1994 Total: 10,000 1993 Total: 20,000 INDIVID

Date	Amount	Comment	Solicitor	Fundraiser
3/16/94	10,000	TRUSTEE PROGRAM MARCH, 19		
12/14/93	10,000	LOS ANGELES EVENT PRES. C		
6/25/93	10,000	WASHINGTON GALA, WDC		
9/22/92	5,000	CLINTON/SAN FRN/LT GOV MC		
9/22/92	5,000	CLINTON/SAN FRN/LT GOV MC		
9/09/92	1,000	Clinton/Harriman/Middlebu		
7/28/92	5,000	Houston,TX Event		
6/01/92	800	Melinda Yee SF & LA Calif		
10/23/90	1,000	Melinda Yee SF & LA Calif		

WRITTEN 1994 Total: 0 1993 Total: 0 COMP

Date	Amount	Comment	Solicitor	Fundraiser

RAISED

Name	Amount	Event	Date

PARTICIPATION

Date	Activity

DELETED FROM
TRULIST
7-26-94 cag

EXHIBIT
AS-9

DNC 31283

MEMORANDUM

To: Richard Sullivan

Fr: David Mercer

Dt: September 14, 1994

Re: VP Luncheon List

This is the list you requested for the VP luncheon on the 9/21. It's a pool of some of the best raisers/writers to draw from. Let's get together to size it down. Thanks for your attention.

Mr. Ernest Green
Managing Director
Lehman Brothers
1627 I Street, NW, Suite 1100
Washington, DC 20006

Melvin E. Clark, Jr., Esq.
President
Metroplex Corporation
512 G Street, SW
Washington, DC 20024

Mr. Richard L. Mays, Esq.
Mays & Crutcher Law Offices
415 Main Street
Little Rock, AR 72201

EXHIBIT
AS-10

Confidential Information

DNC 1587948

Yah Lin "Charlie" Trie
President
Daihatsu International Trading, Inc.
Lafayette Building, Suite L150
523 South Louisiana
Little Rock, AR 72201

Don Barden
President
Barden Communications, Inc.
243 West Congress Street, Suite 1000
Detroit, MI 48226

Ms. Janice Griffin
The Prudential
1140 Connecticut Avenue, NW, Suite 510
Washington, DC 20036

Mr. Eugene G. Jackson
Chairman & CEO
World African Network
5120 West Goldleaf Circle, Suite 380
Los Angeles, CA 90056

Mr. Robert L. Johnson
President & CEO
Black Entertainment Television
1232 31st Street, NW
Washington, DC 20007-3496

Mr. Raymond McClendon
Pryor, McClendon, Counts & Co. Inc.
One Midtown Plaza
1350 Peachtree Street, NE, Suite 850
Atlanta, GA 30309

Confidential Information

DNC 1587949

Dr. Gene Newton
Coordinated Healthcare Systems
6711 Old York Road, Suite 300
Philadelphia, PA 19126

Iralene Barnes
Vice President
Potomac Electric Power Company
1900 Pennsylvania Avenue, NW
Washington, DC 20068

Mr. Frank Brooks
Brooks Sausage Company, Inc.
7600 95th Street
Kenosha, WI 53142

Mrs. Robin Brooks
Managing Director
Willamette Management
8750 West Byrn Mawr Avenue
Chicago, IL 60631

Johnny Chung
Chairman
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo, Suite 809
Torrance, CA 90503

Ms. Carol Thompson Cole
Vice President
RJR Nabisco Inc.
1455 Pennsylvania Avenue, NW
Washington, DC 20004

Randy Echols
President
Echols & Company
901 East Capitol Street, SE
Washington, DC 20003

Anthony Jones
President
Tonya, Inc.
1000 Vermont Avenue, NW, 5th Floor
Washington, DC 20005

Mr. Rollie Kimbrough
President & CEO
MCSI Technologies
8401 Collesville Road, Suite 305
Silver Spring, MD 20910

Weldon Latham
Partner, Shaw, Pittman, Potts, & Trowbridge
2300 N Street, NW
Washington, DC 20037

Mr. William Lucy
AFSCME
1625 L Street, NW
Washington, DC 20036

Bill Lynch
Vice-President
McAndrews & Forbes
38 East 63rd Street
New York, NY 10021

Ms. Marianne Camille Spraggins, Esq.
444 Central Park West, Apt. 104
New York, NY 10025

Confidential Information

DNC 1587951

Larry Gibson
The Kurt Schmoke Committee
36 South Charles Street, Suite 2210
Baltimore, MD 21201

Confidential Information

DNC 1587952

August 21, 1995

Mr. Johnny Chung
Chairman and CEO
Automated Intelligent System
2771 Plaza Del Amo
Suite 809
Torrance, CA 90503

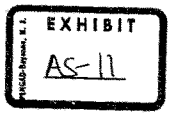
Dear Johnny:

Thought you would be interested in the enclosed.

Sincerely,

Richard Sullivan
National Finance Director

Ari Swiller
Trustee Director



March 1,1995

TO: Kathleen
FR: Richard Sullivan/Ari Swiller
RE: Scheduling Request for Chairman Fowler for March 8th

Meeting requested by Johnny Chung, CEO Automated Intelligent Systems, Inc. Torrance, CA, DNC Managing Trustee

PREFERRED TIME Wednesday Afternoon, March 9th

BACKGROUND

Johnny contributed $94,000 to the DNC and raised an additional $40,000. $60,000 of this was for a DNC fundraising luncheon with the First Lady in Los Angeles on December 3rd, our first fundraiser after the November elections.

Johnny is a second generation Taiwanese American who started out as a computer salesman and formed his own faxcast company, AISI, three years ago. Johnny was named Los Angeles small businessman of the year by the LA NBC affiliate in 1994. His company, AISI does the faxing for many Democratic gubernatorial and senatorial candidates.

PURPOSE OF MEETING

Johnny also does a great deal of business/trade with China. He would like to bring in some of his fellow associates from China who are visiting DC next week for a courtesy meeting with the Chairman. They are all prominent businessmen and include the Chairman of the China Chamber of International Commerce and the Vice President of the China International Trust and Investment Corporation. His group will be meeting with Secretary Brown earlier in the day. Enclosed is the list and bios for the attendees.

Roger Tamez

EXHIBIT

AS-13

DNC 3116350

MEMORANDUM

TO: Don Fowler, DNC Chairman
FROM: Alejandra Y. Castillo AC
DATE: July 12, 1995
Re: Meeting with Roger Tamraz

Pursuant to your meeting with Mr. Roger Tamraz, Capitol Oil Inc., held on Tuesday, July 11; I would like to forward to you some recently received background information on his business operations. As a potential Managing Trustee member, Mr. Tamraz's business dealing may potentially, if not definite, political and ethical implications on the DNC fundraising operations. I have had several conversations with Carol Khare and Ari Swiller regarding Mr. Tamraz's background. Please review the following memo, DNC Finance Department is pending your guidance on whether to continue our conversation with Mr. Tamraz and/or extend an invitation to participate in DNC events.

Roger Tamraz

Biographical Information:

- Egyptian born and U.S. resident.
- Religion: Maronite Catholic
- Educated at the American University in Cairo, Cambridge University,England and at Harvard Business School, Massachusetts.

Business Background:

- In the 1960's, Mr. Tamraz worked for the New York based investment firm of Kidder, Peabody in New York and Beirut.
- In 1974, he set up his own investment firm, First Arabian Corp., to invest the money of Middle East clients.
- Served as Bank Al-Mashrek Chairman--Lebanon's second Largest bank.
- In December of 1988, Mr. Tamraz was accused by the Lebanese authorities of siphoning an estimated $154 million out of the second-largest bank in Lebanon, Bank Al-Mashrek.
- During this time, Mr. Tamraz headed Jet Holding, owners of TransMediterreanean Airways (TMA-cargo specialist) and Middle East Airlines (MEA).
- Owner of TAMOIL, since the late 1980's, Mr. Tamraz has slowly sold or merged his holdings of TAMOIL. Among the big Tamoil buyers is Oilinvest, an overseas investment arm of Libya's National Oil Company. Oilinvest's acquired the Milan-based Tamoil group of companies with operations in Italy and Spain.--**Further explained in Event section.**

Events:1980's

- On March 6, 1989, the international press reported that Roger Tamraz had been kidnapped on Feb 19. However, a Beirut newspaper reported that Tamraz fled after a run on his bank and amid accusations he embezzled $200 million. Tamraz fled from the Christian east Beirut

to the Moslem-held western part seeking the protection of Moslem militia when judicial authorities issued a warrant for his arrest.

• While seeking safe haven in west Beirut it was reported that Hobeika, a former commander of the Lebanese Force--the main Christian militia, forced Tamraz to pay a $3 million he claimed was owed him after the collapse of the Bank Al-Meshrek. Hobeika is held responsible for the September 1982 massacre of hundred of Palestinian civilians by Christian militiamen in two Beirut refugee camps after Israel invaded Lebanon.

• Tamraz was freed after paying the final installment of a $3 million ransom. However, Tamraz denied all news stories of ever having been kidnapped.

• Investors say the bank, under Tamraz direction, made shaky investments in Spanish real-estate, casinos in Portugal and a money losing cargo airline. Sources claim that Al-Mashreq bank ran into difficulties because Tamraz, who owned at the time 20 enterprises, had Al-Mashreq invest cash reserves to fund private businesses.

• Lebanon's Central Bank has had to fund the Al-Mashreq to prevent it from total collapse and bail out local depositors, a step which could have shaken the country's banking system. It was estimated that Al-Mashreq bank had a deficit of $100 million.

Events: 1990's

• Since the 1980's Tamraz has worked to revitalize his oil business in lieu of financial and political mishaps in Lebanon. TAMOIL, a leading oil company (refineries, gasoline stations) with holdings in Italy (5.3% of Italian Market) and Spain (---) have been slowly partitioned and sold during the last seven years to OILINVEST.

• Despite the Washington's freeze of Libyan assets and boycott of Libya-related companies, Tamraz aided OILINVEST, an overseas investment arm of Libya's National Oil Company, to continue a pattern of acquisitions in Italy during the 1980's. OILINVEST acquired 89.5 % equity in TAMOIL and a network of 1,945 service station as well as distribution centers throughout Italy. OILINVEST, through TAMOIL, bought 75% in Volcan Oil Milan.

• By 1992, Beirut bankruptcy court approved several offers to sell TMA, the cargo airline under Tamraz' s direction. The deal involved the payment of $8 million and the bank's taking responsibility for TMA's estimated $35 million debt incurred as part of Al-Mashreq bank financial crisis.

• Presently, Tamraz is Chairman of OIL CAPITAL INC. Oil Capital Inc has announced a new plan to build a large $2 billion pipeline through Armenia. It is expected that over 100 million barrels of oil per day will begin to flow from the two Caspian Projects Azerbaijan and neighbors, Kazakhastan and Turkmenistan, could have well over 100 billion barrels of oil, making them comparable to Iraq or Kuwait and potentially bigger than Alaska's Prodhoe Bay or North Sea.

• This Caspian deal is drawing Washington in. Washington is feeling the mounting pressures

DNC 3116352

from oil companies such as Amoco, Mobile, Exxon, McDermott, Brown & Root, Bechtel, and Chevron. The Clinton Administration is being pushed to alter its pro-Russia policy and start backing the republics in an attempt to push the deal forward.

Conclusions:

Based upon the above stated events, it is clear that Mr. Tamraz has several problems pending before the international business community. Among the more recent events concerning Mr Tamraz is his bar from participating in a Commerce Department Trade board (unofficial-Carol Khare received warning from a DOC friend).

In a conversation held with Ari Swiller yesterday, Mr. Tamraz expressed his desire to contribute $300,000 to the DNC. Indeed, his contribution is greatly appreciated and highly needed, however, his past involvement in shaky international business and para-military organizations may generate considerable problems for the DNC. Mr. Tamraz seeks political leverage to secure his oil ventures in the Russian Republics (Caspian Oil Project).

Our association with Mr. Tamraz should be well defined, a difficult task given his complex business connections and political associations. His business background has proved to be full of significant financial and ethical troubles. Pay attention to these warning signals!.

I hope this memo has provided you with the information needed.

CC:

Carol Khare
Ari Swiller

MEMORANDUM FOR ROGER TAMRAZ

FR: Richard Sullivan
Ari Swiller
RE: Contributions
DT: March 28, 1996
****

7-19-95 - $20,000, Richard Molpus for Governor
$25,000, Virginia Democratic Party
$25,000, Louisiana Democratic Party
$20,000, Written, DNC Federal Account
7-29-95 - $20,000, Raised, Elias Haddad and Norma Haddad
8-29-95 - $ 5,000, Written, Richard Molpus for Govenor
9-01-95 - $20,000, Raised, Gil Sireni
9-01-95 - $20,000, Raised, Marcia Sireni
9-10-95 - $50,000, Written

MEMORANDUM FOR ROGER TAMRAZ

FR: Richard Sullivan
Ari Swiller
RE: Contributions
DT: March 28, 1996

$100,000	Virginia Democratic Party
25,000	Virginia Legislative Conference
20,000	Molpus for Governor of Mississippi
25,000	Louisiana Democratic Party
130,000	DNC

DNC 3116355

2nd
H. Burns

AGINS, SIEGEL & BERNSTEIN, LLP

Attorneys-at-Law

Irwin Siegel
Richard C. Agins
Glenn A. Reiner
Carl D. Bernstein

Stephen S. Siminou
Neil S. Miller
Rhonda L. Gaynier

342 MADISON A
NEW YORK, NEW YORK 1017
(212) 98
FAX (212) 56

Solomon J. Freed
Kalmon D
Charles M. New
Co

August 14, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Hon. William Jefferson Clinton
President of the United States
The White House
Washington, D C 20005

Re: **Hermes Enterprises, Ltd. v. The Democratic National Committee**

Dear President Clinton

Enclosed are copies of my letter to The Democratic National Committee, dated May 31, 1996 and July 2, 1996, on behalf of Hermes Enterprises, Ltd., 641 Fifth Avenue, New York, New York 10022

Incredibly, neither my client nor I have received any response and we must turn to you for relief

Mr. Fowler had agreed with my client that he would provide two video tapes featuring addresses by you for presentation to the Greek-American community here in New York, one for use last New Year's Eve, and the second for use on the 25th Anniversary of Greek Independence. Neither of those tapes were supplied, although the requested contribution of $50,000 was made to the "D N C " by check dated December 23, 1995

Unfortunately, therefore, we had no alternative but to request a refund of that amount

The D N C s failure to respond leaves us no alternative but to advise you that, unless this matter is resolved within ten (10) days of the date of this letter, we must commence an action to secure the refund due to Hermes Enterprises Ltd

We sincerely hope this will not be necessary

Very truly yours

Richard C Agins

Hermes Enterprises Ltd

EXHIBIT
AS-14

EOP 05587

MED-TECH®

Medical-Technical Gases, Inc. 20 Hall Street, Medford, MA. 02155, Tel. (617) 395-1946

FAX COVER SHEET

DATE: 7/18/95 TIME: 6:19 pm

NUMBER OF PAGES, INCLUDING THIS SHEET: 5

PERSON TO CONTACT IF PROBLEM WITH FAX TRANSMITTANCE:

FAX SENT TO:

Ari Swiller
NAME

DNC
COMPANY

DEPARTMENT

[redacted]
FAX NUMBER

Ramesh requested Trustee as well

FROM:

Ramesh V. Kapur

Dear Ari,

The topics of discussion with Roger Johnson will be:

1. How do we get more Indian-Americans high-level positions with the GSA?
2. How do we prevent Indian-American businesses from becoming pigeonholed into smaller contracts when they are capable of handling larger contracts?

A copy of Pratap Rajadhyaksha's resume follows together with information regarding his companies.

Roger Johnson (GSA) on Thursday

Toll Free: (800) Fine Gas • Fax (617) 395-9098
SINCE 1961

EXHIBIT
AS-15

DNC 3235707

MEMORANDUM FOR CHAIRMAN FOWLER

From: Ari Swiller
Date: April 3, 1996
Re: Meeting with Joe Ruggiero and Jim Irwin

Jim Irwin and Joe Ruggiero are the Chairman and Vice Chairman, respectively, of IMPAC Group. Last year when we met with Joe he complained about his treatment from the DNC during the previous two years. He committed to increse the contributions from IMPAC if his inclusion at DNC events improved. He was immediatley included in a black-tie White House dinner (February 22) with his wife and restated his commitment to the DNC. I dogged for a few months on his promised contribution -- it never materialized It is my understanding that this meeting is another opportunity for him to air his grief before he commits to help the DNC at the Connecticut Gala with a $100,000 IMPAC has given over a quarter of a million dollars to the RNC over the past few years and

EXHIBIT
AS-16

DNC 3063532

IMPAC

INTEGRATED CONTROL SYSTEMS, INC.

VIA FAX TRANSMISSION

JOSEPH A. RUGGIERO
VICE-CHAIRMAN

TO: Anne Brazil, Democratic National Committee

FROM: Joseph A. Ruggiero, Vice Chairman

RE: Issues discussed at meeting with Mr. Irwin and Mr. Ruggiero

DATE: April 17, 1996

Pursuant to your request, the following issues were what we discussed at our meeting with Mr. Fowler:

(1) Would like an appointment with the American Ambassador to Finland.

(2) Would like to talk to Senior White House Advisor on immigration matters about the exception in the statutes to allow consultants, like Arthur Anderson, to work in the United States. Should be extended to all companies doing this type of work, otherwise no none.

(3) Would like two (2) passes to the Democratic National Convention.

(4) Would like to meet with woman who heads up the National Performance Review Council to see if we can get one of our people appointed to their Board.

I will be in our Connecticut office next Tuesday and Wednesday (203) 567-0135 if you wish to speak with me, otherwise you can contact me through my assistant, Joan Zammett in the Florida office.

Thank you for any assistance you may be able to give us.

Regards,

Joseph A. Ruggiero, Vice Chairman

JAR/jaz

900 WEST MARION AVENUE PUNTA GORDA FLORIDA 33950 USA
941-639-6677 1-800-992-4672 FAX 941-639-9498

CORPORATE MEMBER

DNC 3063533

March 8, 1996

The Honorable Derek Shearer
Ambassador to Finland
United States Embassy -- Helsinki
APO AE 09723

Dear Ambassador Shearer:

Attached is a letter from Joseph A. Ruggiero and Jim Erwin which details the background of the libel case involving their company, Integrated Control Systems, Inc.

I would appreciate any assistance you may offer to Mr. Ruggiero and Mr. Erwin regarding this matter. Please contact me at if you have any questions regarding this matter. Thank you for your assistance.

Sincerely,

Donald L. Fowler
National Chairman

DLF/arb

-ONC

WIN IN '96 DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler, *National Chair* • Christopher J. Dodd, *General Chair*

September 28, 1995

OK
-John

[redacted][1]
[redacted][2]
[redacted][3]
[redacted][4]
[redacted][5]

Dear [redacted][6]:

1995 has been a good year for the Democratic National Committee and for the Clinton Administration. President Clinton's policies are moving the country in the right direction. But we have some critical issues facing us during the current debate over budget priorities and the role of government. The President has asked me to invite you and a small group of other people to discuss these matters and what we are doing about them. Please join us for coffee at the White House on October 6 at 9:00 a.m.

Someone will call you within a few days to determine if you can join me. Thank you. I look forward to seeing you on October 6.

Sincerely,

Donald L. Fowler

10/3 yes. At the Hay Adams. Does Harold need to go? He has lunch with Carville scheduled.

10/3 NO - But make sure DS is there!

10/2 Hdin I heard they moved it to lunch out of WH, please confirm. J

EXHIBIT
AS-17

EOP 035478

Democratic Party Headquarters • 430 South Capitol Street, S.E. • Washington, D.C. 20003 • 202.863.8000 • FAX: 202.863.817

Paid for by the Democratic National Committee. Contributions to the Democratic National Committee are not tax deductible.

DNC FINANCE CALL SHEET

For:

CALL SHEET PREPARED BY: Ann Braziel

DATE: December 3

NAME: Jonah Shacknai

TITLE: Chairman and CEO

COMPANY: Medicis Pharmaceutical Company

ADDRESS: Phoenix, AZ

PHONE:

ASST NAME:

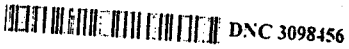
CONTRIBUTOR HISTORY: $20k in 1992

REASON FOR CALL: He is very interested in participating in convention, but is not sure about membership. Ask him to begin renewal of his Trustee membership at $25k and attend the Coffee with the President on 12/13, 15, or 21.

ADDITIONAL NOTES:

CALL RESULTS:

Confidential Information


DNC 3098456

(5) DON

DNC FINANCE CALL SHEET

FOR: Vice President Gore

CALL SHEET PREPARED BY: Richard Sullivan/ Ari Swiller

DATE: December 1, 1995

NAME: Peter May

TITLE: President, COO

COMPANY: Triarc Companies, Inc.

ADDRESS: 900 Third Avenue
31st Floor
New York, NY 10022

PHONE:

ASST NAME:

CONTRIBUTOR HISTORY: Peter contributed $50,000 in October of 1995, $100,000 in September of 1994 and $110,000 in May of 1993.

REASON FOR CALL: Ask Peter to contribute an additional $50,000 to the DNC Media Fund.

ADDITIONAL NOTES:

CALL RESULTS:

12/11 - 9:30 - Done

EOP 049239

EXHIBIT
AS-19

MEMORANDUM TO ARI SWILLER

From: Matt
Date: April 21st
Subject: "Loose Ends"

- **Frank Moore Tour Request** Maureen Bates requested two tours for friends of Frank Moore earlier this month. I immediately sent a memo to Susan (see attached). As you know, the first tour was botched. Susan is out sick today. I called Karen Anderson at the White House and she agreed to lead the tour on either the 26th or 27th of April. I then spoke with Maureen, who said the 27th is preferable. The tour, then, is set for Thursday, April 27th at 10:30 AM with Karen Anderson and the party of Frank Farrero (2 adults, 1 child). I have relayed all this information to Nancy, who said she would follow-up next week. Maureen Bates is out next week: Tom Sadler at will be handling her work.

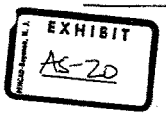
- **Donna Shalala-Alan Solomont** I have spoke with Nancy Chestnut, Shalala's scheduler, on two occasions regarding the request. She had said she would get back with me on Thursday, April 20th. She knows of Alan Solomont and what he has done for us, and the importance of this request. I have left three messages with her this morning. Her number is 690-6610.

- **Queen of Thailand** As you know, Pauline Kanchanalak has asked to be included in the Queen of Thailand state dinner in May. I have only been involved with this request in that I spoke with Georgi Kronenberg on April 12th to field the request.

- **Suzanne Morelle** Suzanne suggested doing lunch sometime soon. Her number is 647-4121.

- **Dodd Thank-you Letters** During the recess, Chairman Dodd has been unable to sign letters. I have submitted our letters and envelopes to Rachel Hirschberg, who said she would have him sign them as soon as possible and make copies for us. She has not given us copies. We should touch base with her to make sure this happens.

- **Jewish and Chinese-American Trustee List Requests** Debi Mohile has requested a list of Jewish Trustees so that she can update her database. Steve Boyd has requested a list of Chinese-American Trustees for Andrew Hsi of the Secretariat of Taiwan, per the request of Jim Brady, DNC Vice Chair. Steve's extension is Jim Brady's number is Nancy said she would follow up with both these requests with you on Monday. Neither request is urgent.



MEMORANDUM

DATE: APRIL 24, 1995

TO: STEVE BOYD

FROM: ARI SWILLER
NANCY BURKE

RE: CHINESE-AMERICAN TRUSTEES

Our current Chinese-American Trustees are:

Mr. Johnny Chung (Managing Trustee)
Automated Intelligent Systems, Inc.
2771 Plaza Del Amo
Suite 809
Torrance, CA 90503
Office: 800-999-1736
Fax: 310-328-8881

Mr. Charlie Trie (Managing Trustee)
Mrs. Wang Mei Trie
President
Daihatsu International Trading, Inc.
523 Louisiana Street
Suite LL150
Little Rock, AR 72201
Office: 501-370-9522
Fax: 501-376-8989
Home:

Dr. C.J. Wang (Managing Trustee)
Dr. Mildred Wang
Chairman
International Corporation of America
1300 Army-Navy Drive
Apartment 408
Arlington, VA 22202
Office: 703-979-2412
Fax: 703-979-0473
Home:

Confidential Information

DNC 1781772

EXHIBIT
AE-21

Memorandum

TO: Ari Swiller
Richard Sullivan

FR: Eric Sildon
Jay Dunn

RE: Nominees to the President's Export Council

DT: January 24, 1994

The Commerce Department has asked that DNC Finance submit recommendations for nominees to the President's Export Council by the end of today, Monday, January 24.

They are currently seeking minorities and women to serve. The nominees must be CEOs of companies dealing in export businesses.

No WLF to my Knowledge are in Export business —

DNC 3052822

[The deposition of Dick Morris follows:]

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
U.S. HOUSE OF REPRESENTATIVES,
Washington, DC.

DEPOSITION OF: RICHARD S. MORRIS

THURSDAY, AUGUST 21, 1997

The deposition in the above matter was held in Room 2247, Rayburn House Office Building, commencing at 9:15 a.m.

Appearances:

Staff Present for the Government Reform and Oversight Committee: Barbara Comstock, Chief Investigative Counsel; Kristi Remington, Investigative Counsel; Michelle E. White, Investigative Attorney; Greg Zoeller, Majority counsel; Elliot Berke, Majority staff; Kenneth Ballen, Minority Chief Investigative Counsel; Andrew J. McLaughlin, Minority Counsel; Phil Schiliro, Minority staff director; David Sadkin, Minority counsel; and Kristin Amerling, Minority counsel.

Also present: Representative Cummings.

For MR. MORRIS:

DAVID LENEFSKY, ESQ.
Attorney & Counselor at Law
18 East 48th Street
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Ms. COMSTOCK. On the record. Good morning, Mr. Morris. I would like to begin by thanking you on behalf of the members of the Committee on Government Reform and Oversight for appearing here today. I am going through an opening statement here we read to all our witnesses.

This proceeding is known as a deposition. The person transcribing this proceeding is a House reporter and notary public. I will now request that the reporter place you under oath.

THEREUPON, RICHARD S. MORRIS, a witness, was called for examination by Counsel, and after having been first duly sworn, was examined and testified as follows:

Ms. COMSTOCK. I would like to note for the record those who are present at the beginning of the deposition. My name is Barbara Comstock. I am the chief investigative counsel on the committee. I am accompanied today by Kristi Remington as Majority counsel and Michelle White, who is also Majority counsel.

Ken Ballen is the designated Minority counsel for the committee this morning, and he is accompanied by Andy McLaughlin.

Mr. MCLAUGHLIN. Andrew, actually.

Ms. COMSTOCK. With the Minority staff.

The deponent is represented by Mr. Lenefsky.

Although this proceeding is being held in a somewhat informal atmosphere, your testimony here today has the same force and effect as if you were testifying before the committee or in a courtroom.

If I ask you about conversations you have had in the past and you are unable to recall the exact words used in the conversation, you may state that you are unable to recall those exact words and then you may give me the gist or substance of any such conversation to the best of your recollection.

If you recall only part of a conversation or only part of an event, please give me your best recollection of those events or parts of conversations that you do recall.

If I ask you whether you have any information upon a particular subject——

Mr. LENEFSKY. Can you identify the gentleman who just walked in?

Ms. COMSTOCK. It is another Majority member of the committee.

The WITNESS. What is your name?

Mr. BERKE. Elliot Berke.

The WITNESS. Member or counsel?

Ms. COMSTOCK. Staff member of the committee, on the Majority staff.

If I ask you if you have any information upon a particular subject and you have overheard other persons conversing with each other regarding it or seen correspondence or documentation regarding it, please tell me that you do have such informa-

tion and indicate the source, either a conversation or documentation or otherwise, from which you have derived such knowledge.

Before we begin the questioning, I would like to give you some background about the investigation and your appearance here.

We have another staff member.

Mr. BALLEN. David Sadkin.

Ms. COMSTOCK. He is with the Minority staff.

Pursuant to its authority under House Rules X and XI of the House of Representatives, the committee is engaged in a wide-ranging review of possible political fundraising improprieties and possible violations of law within the committee's jurisdiction.

Pages 2 through 4 of House Report 105–139 summarizes the investigation as of June 19, 1997, and encompasses any new matters which arise directly or indirectly in the course of the investigation. Also, pages 4 through 11 of the report explain the background of the investigation.

All questions related either directly or indirectly to these issues, or questions which have a tendency to make the existence of any pertinent fact more or less probable than it would be without the evidence, are proper.

The committee has been granted specific authorization to conduct this deposition pursuant to House Resolution 167, which passed the full House on June 20, 1997. Committee rule 20, of which you have received a copy, outlines the ground rules for the deposition.

Majority and Minority committee counsel will ask you questions regarding the subject matter of the investigation. Minority counsel will ask questions after Majority counsel has finished. After the Minority counsel has completed questioning you, a new round of questioning may begin.

Members of Congress who wish to ask questions will be afforded an immediate opportunity to ask their questions at any time when they may be present. When they are finished, committee counsel will resume questioning.

Pursuant to the committee's rules, you are allowed to have an attorney present to advise you of your rights. Any objection raised by your attorney during the course of the deposition shall be stated for the record.

If the witness is instructed by his attorney not to answer a question or otherwise refuses to answer a question, Majority and Minority counsel will confer to determine whether the objection is proper. If Majority and Minority counsel agree that a question is proper, the witness will be asked to answer the question.

If an objection is not withdrawn by the witness' attorney, the chairman or member designated by the chairman may decide whether the objection is proper.

This deposition is considered as taken in executive session of the committee, which means it may not be made public without the consent of the committee, pursuant to clause 2(k)(7) of House Rule 11. You are asked to abide by the rules of the House and not discuss with anyone, other than your attorney, this deposition and the issues and questions raised during this proceeding.

Finally, no later than 5 days after——

Mr. LENEFSKY. Excuse me.

The WITNESS. Just one second.

[Discussion off the record.]

Mr. LENEFSKY. Please continue.

Ms. COMSTOCK. Finally, no later than 5 days after your testimony is transcribed and you have been notified that your transcript is available, you may submit suggested changes to the chairman.

I would just like to let you know, with agreement of counsel, we have been waiving that 5 days, if you need additional time. Also, we can make arrangements to mail the transcript to you so you can have an easier time reviewing it.

We do ask, however, that you sign a form, that Majority and Minority counsel have agreed upon, that asks both you and the client to sign a form saying you haven't shared the deposition with anybody when we let it out of the committee offices.

The transcript will be available for your review at the committee office.

Also, committee staff may make any typographical and technical changes requested by you. Substantive changes, modifications, clarifications, or amendments to the deposition transcript submitted by you must be accompanied by a letter requesting the changes and a statement of your reasons for each proposed change.

A letter requesting any substantive changes, modifications, clarifications, or amendments must be signed by you. Any substantive changes, modifications, clarifications, or amendments shall be included as an appendix to the transcript, conditioned upon your signing the transcript.

Do you have any questions about anything we have gone over so far?

The WITNESS. No.

Ms. COMSTOCK. I just want to go through a few ground rules. I just want to indicate for the record that the House committee may regard this as an informal setting, but it seems pretty formal to me.

Mr. BALLEN. I just want to add to the remarks, so that you and your counsel are aware, that under House Rule 11(2)(K)(8), any objections as to relevancy or pertinency are a matter for the committee to decide and rule on.

Mr. LENEFSKY. I understand, reading the rules, it would first go to the chairman.

Mr. BALLEN. First goes to the chairman and then is appealed to the committee. Some issues are for the chairman. But objections as to relevancy or pertinency do go to the committee ultimately.

Ms. COMSTOCK. I will be asking you questions concerning the subject matter of this investigation. I would ask, if you don't understand a question, you please say so, and I will repeat it or rephrase it so you do understand the question.

The reporter will be taking down everything we say and will make a written record of the deposition. You must give verbal, audible answers because the reporter cannot record what a nod of the head or other gesture may mean.

Do you understand that you must give audible answers?

The WITNESS. Yes.

Ms. COMSTOCK. If you can't hear me, please say so, and I will repeat the question or have the court reporter read the question to you.

I would ask that you wait until I finish each question before answering. I will wait until you finish your answer before I ask the next question. Do you understand that this will help the reporter make a clear record because he cannot take down what we are both saying at the same time?

The WITNESS. Yes.

Ms. COMSTOCK. Okay.

Mr. BALLEN. Kristin Amerling with the Minority staff.

Ms. COMSTOCK. We have another Minority staff member arrive.

Your testimony is being taken under oath today as if we were in court, and do you understand that your answers will be assumed to be responsive to the questions?

The WITNESS. Yes.

Ms. COMSTOCK. Are you here voluntarily or as a result of a subpoena?

The WITNESS. Voluntarily.

Ms. COMSTOCK. Do you have any questions about the deposition before we begin?

Mr. LENEFSKY. No.

EXAMINATION BY MS. COMSTOCK

Question. Could you please state your full name and address for the record?

Answer. Richard S. Morris, M-O-R-R-I-S.

Question. And do you have any other addresses?

Answer. Yes.

Question. Could you provide those for the record?

Answer. [Redacted.]

Question. Can you provide your phone numbers for each of those addresses, please?

Answer. [Redacted.]

Question. Has that been the same from approximately 1994 to the present?

Answer. Yes.

Question. Okay.

Answer. [Redacted.]

Mr. BALLEN. Excuse me, Counsel. I want to add something for the record here. I assume that before—if these depositions are ever voted on to be publicly released by the committee—last time they were placed on the Internet—that Mr. Morris, in the interests of privacy, his home numbers be removed from any such public release.

Mr. LENEFSKY. Thank you for that information. I didn't realize there is a possibility this would be on the Internet or, in fact, released to the public.

Mr. BALLEN. There certainly is. If the committee votes to do that, these depositions could be publicly released.

The WITNESS. Particularly if it is in the section on cybersex, I would like it deleted.

Ms. COMSTOCK. I would say for the record, last year that was by agreement of the Majority and Minority Counsel that all of the depositions be made public, and no questions had been raised at that time. But we will be happy to entertain any concerns in that matter.

The WITNESS. I would request the phone numbers be deleted. Yes, go ahead.

EXAMINATION BY MS. COMSTOCK:

Question. Could you provide for us any cellular phone or other phones you may have had between 1994 to the present?

Answer. Oh, I had one during the campaign, but I don't recall the phone number and I don't have it any more.

Question. Do you know who paid for that cellular phone?

Answer. Yes; Clinton/Gore.

Question. Was that one number that you had throughout the——

Answer. Yes.

Question. Do you know approximately when you got that phone number?

Answer. Early '95.

Question. And do you know how long you kept it?

Answer. Until August 26th, '96.

Question. Those phone bills were all paid for by Clinton/Gore?

Answer. Yes.

Question. And to your knowledge, did Clinton/Gore maintain all of those?

Answer. Yes. I also have a car telephone, and the phone number in the car is [redacted], and I have had that continuously since '94.

Question. All right. Have you discussed this deposition this morning with anyone other than your attorney?

Answer. No.

Question. Have you——

Answer. With my wife, but no one else—no, no, I am sorry; yes, I did. I was interviewed by the Washington—somehow, the Washington Times and the New York Post and USA Today all learned of the deposition and they all called me for comment, and I did interview them about this deposition.

Question. About this deposition or yesterday's deposition?

Answer. They actually called knowing about today's, not yesterday's, and I told them about yesterday's.

But this was before yesterday. Is that clear?

Mr. BALLEN. For the record, yesterday being the Senate?

The WITNESS. Yes. In other words, they had information about the House deposition, not about the Senate.

EXAMINATION BY MS. COMSTOCK:

Question. Okay. Could you please describe your employment history from college forward?

Answer. After college, I worked as a research analyst at the New York City Citizens Budget Commission, a civic watchdog group. After that, I was employed by—I was basically self-employed, and my company was called Public Affairs Research Organization.

In 1977, I joined another firm that I owned called Dresner, D-R-E-S-N-E-R, Morris, Tortorello, T-O-R-T-O-R-E-L-L-O. I worked for them through the end of 1982.

From 1983 on, I have been self-employed either through my own name or Dick Morris Consulting or Message Advisers. And in 1995, in July of 1995, I became an employee of the Clinton/Gore campaign and remained in their employ until August 1996, and I have been either self-employed or unemployed, as you wish, since then.

Question. When was the first time you met President Clinton?

Answer. In November—roughly November 1977.

Question. And were you working for him on a campaign at that time?

Answer. I was asking to be hired by a campaign at that time, and shortly thereafter I was.

Question. And could you describe in your history working with Mr. Clinton from that time forward?

Answer. He engaged me about December of 1977 to advise him on his gubernatorial race in 1978 in Arkansas. I did so. He dismissed me sometime in 1979; I don't recall exactly what month. Then he hired——

Question. The circumstances, you just stopped working?

Answer. No; he fired me.

Question. And is there any reason?

Answer. He didn't—he felt that he wanted to hire someone else who had more of a national reputation, and he disagreed with one of the recommendations I gave him, which is that he should not raise taxes, and he felt that it was unduly intrusive of me to make recommendations of that sort.

He rehired me the day after Election Day in 1980, after his defeat, and I was in his employ as a consultant more or less continuously between then and January 1991.

I say more or less because there were times during that period when I was paid a monthly retainer, and there were times when I was not, I was just paid on a poll-by-poll basis.

I stopped work for him professionally in January of 1991. I had no professional involvement with him between January of 1991 and November 1994—I am sorry, October 1994, and—although I did chat with him and advise him over the phone just as a friend.

Then I worked for him part-time between November '94 and June '95 and full-time from July '95 until August '96.

Since August '96, I have no professional relationship with him. As before, we continue to talk, to chat.

Question. Okay. You said throughout the eighties, essentially, you were either on a monthly retainer or paid on a poll-by-poll basis.

Answer. Correct.

Question. Were you paid by Mr. Clinton's campaign operation?

Answer. I don't recall. Generally speaking, yes, and I was never paid by the State of Arkansas, never paid by tax money. I cannot recall the names of the different campaign committees that paid me though, but it was always by some committee that he controlled, whether it was a campaign committee or committee for education in Arkansas or something like that.

Question. Okay. Do you know if you were ever paid by any independent sources or independent expenditure-type money?

Answer. I can't be completely certain, but I have no recollection of ever having been paid by any such entity. I don't believe that I was. But I did receive probably 1,000 checks from him over the course of the eighties, and it is conceivable that one of them might have been something like that, but I have no recollection of it.

Question. When you said you thought you may have been paid by an education committee, was that something separate from a campaign committee?

Answer. Yes. I don't recall how he paid me, but in 1983 I worked with him on ads, very similar to the ones we ran in '95, which were issue advocacy ads in connection with his desire to increase the sales tax in Arkansas and test teachers. And there was a committee that was separate from the campaign that raised money for that effort. And he might have paid me through that, or I might have been paid through his campaign; I don't recall.

Question. Do you have any knowledge of who contributed to those committees?

Answer. No.

Question. In any of the work you did for Governor Clinton, did you ever work with an individual named David Watkins?

Answer. Yes.

Question. On what occasions did you work with Mr. Watkins?

Answer. Constantly, throughout the whole period. He was the person who produced the advertisements for Clinton, and in virtually—in any of the campaigns, except for the 1978 campaign, which is to say in the '82, '84, '86, and '90 campaigns, he would be in virtually all of the meetings that we had in the 2 or 3 months before Election Day, and he and I would work together to produce the ads for Clinton.

Question. And were you aware of him working in the '92 campaign?

Answer. Yes. I had one occasion to be aware. He called me—he had occasion to call me at one point in roughly February of 1993—1992.

Question. And——

Answer. It was right before the New Hampshire primary, and he was seeking advice and basically asked me if I would receive a call from Governor Clinton, and I said I would. And the next—I was in France, so I remember it. The next day, the Governor called and we talked for about 40 minutes or an hour or so on this campaign, and I gave him political advice at that time.

But other than that, I had no contact with Watkins during the '92 campaign.

Question. All right. Have you been in touch with Mr. Watkins recently at all?

Answer. No. I called him after—a couple of months after he had to resign. I forget when that was, I think it was in '94.

Question. May of '94, he left the White House.

Answer. So I called him at one point toward the end of '94 just to tell him I still liked him and cheer him on, and I had—I think I may have called him back a few weeks later in the same vein. But since that, I have had no contact with him.

Question. Did you ever talk with him about any investigations at the White House?

Answer. No, except to tell him that I thought that the President acted precipitously in discharging him.

Question. Regarding the helicopter incident?

Answer. Yes.

Question. Did you have any knowledge of that incident——

Answer. Just what I read in the paper.

Mr. BALLEN. I object to that line of questioning. I didn't know this committee's charge was to reopen that, the Watkins matter.

You can proceed, Counsel.

EXAMINATION BY MS. COMSTOCK:

Question. Other than this call that you said in 1992, did you have any other role in the 1992 campaign?

Answer. Yes. I spoke with the President five or six times during the '92 campaign, and with the now First Lady probably a dozen times, just on the basis where I was just offering advice and counsel. It was not a paid relationship or a formal one.

I didn't meet with either of them during 1992, but I did have those occasions to speak to them, to give them political advice.

Question. All right. And in 1992 or any time you worked during the 1980s on Clinton campaigns, did you ever have an opportunity to meet with someone named John Huang?

Answer. No.

Question. You have never met Mr. Huang?

Answer. No.

Question. Do you have any knowledge about Mr. Huang's fund-raising?

Answer. Just what I read in the paper.

Question. Did you ever have any occasion to meet any member of the Riady family?

Answer. No.

Question. Do you have any knowledge about any fund-raising by the Riadys?

Answer. No. The only person vaguely in that ilk who I have ever met was, I may have met Mr. Trie, because I ate at his restaurant and I may have seen him then, but I didn't know it was him until—I still don't know if I have ever seen him. He is a smiling guy that greeted you as you walked in. I didn't know if it was him. When you are in——

Question. He also has restaurants in Beijing.

Answer. When you are in Arkansas, you eat Chinese food.

Question. Do you have any knowledge of any particular people or groups of people who are involved in fund-raising throughout the eighties, any core group of people in Arkansas that you knew of?

Answer. Well, I knew that Betsy Wright was heavily involved in the fund-raising. I knew that Maurice Stans was involved—is that the Nixon person? No, Maurice somebody or other.

Question. Maurice Stans was a Nixon fund-raiser.

Answer. It was an old codger named Maurice something or other, who hung around, who was supposed to have access to money. I just vaguely knew that the two of them were doing something in raising money.

I knew that Clinton required constant badgering to make fund-raising phone calls, and I would just periodically tell him, you know, I hope you are raising money. A couple of times I would be recommending media expenditures, and he would be saying, I don't have the money for those, and then I would say something like, you better go out and borrow the money for those, because we got to put those ads on, because we will lose if we don't.

But other than demand for money on the expenditure end, I had no knowledge at any time of where any of the money came from in terms of donors, fund-raisers, parties, or anything like that.

Question. And when you made recommendations such as you just relayed about that the President better, or at that time the Governor, needed to spend the money or borrow it, that this was essential, did the President usually—did Mr. Clinton usually take your advice?

Answer. The Governor did, almost all the time.

Question. He had trust in your judgment on those types of matters?

Answer. Yes. See, unlike you, I am used to calling him Governor.

Question. Get the names and time sequences correct.

Okay, could we move a little, going to when you first started to work for Mr. Clinton as President Clinton.

Answer. Yes.

Question. Can you describe how that came about?

Answer. During—shortly after the '92 election, I met with the President-elect and the First Lady-elect in Arkansas, and we had a meeting of an hour or two hours, and the President-elect asked me if I would occasionally call him with ideas and

advice and meet with him from time to time and keep a more regular contact with the First Lady to provide a channel of advice for him.

During 1993 and 1994, through October—through the last week of September 1994 would be the end of this period—I had occasion to meet with the President probably 8 to 10 times, meet with the First Lady three or four times, speak to the President by phone three or four times, and speak to the First Lady by telephone 30 to 50 times. None of that was paid, and in all of the conversations I was just offering advice on matters that had occurred to me and things that I had thought of. Virtually all of the contacts were initiated by me.

So I think that describes our relationship during that period. Shall I pause?

Question. Did you have a particular phone line that you called them on?

Answer. No.

Question. You just called the main switchboard and would—who did you usually contact to try to get through?

Answer. To speak to the First Lady, I would call Pam Sipareti, I think, or something like that, who works for the First Lady. [Redacted] was the number I would use. And when I was calling the President, I would call, the switchboard, and get connected through that way.

Question. You would usually go through Ms. Hernreich or his main office?

Answer. Usually Ms. Hernreich or Ms. Currie.

Question. Okay. Why don't you continue on?

Answer. Okay. In the last few days of September or the first few days of October of 1994, the President called me and asked me to do a survey for him, the first professional engagement I had had with him since January of 1991. And I did the survey concerned the positioning that he and the Democratic Party should assume in the '94 bi-year elections.

I did the survey. I briefed he and the First Lady on the results and was paid for the survey.

Question. And who paid you for that?

Answer. I am afraid I recall neither end of that transaction. I don't recall who paid me, and I don't recall who they paid. I don't recall whether the check was—I only charged him the actual cost of the interviews, and I may have told them to send the check to the interviewing house I used to do the survey, which was called Action Research in Melbourne, Florida, which is the interviewing house I usually use.

Or I may have asked him to send the check to me, and I may have then paid the interviewing house. I don't recall which one it was. And I don't recall which entity paid for the survey, whether it was DNC or Clinton campaign or anything of that sort. I have no recollection of that.

I think that, but I am not sure, the check was probably paid directly to the interviewing house rather than to me, since I do recall that I decided not to make a profit on it, because I felt that by holding the price down, I would encourage him to seek my services more frequently in the future.

Question. At that time, was there any concern about paying you directly, going to the DNC or Clinton/Gore and putting you on the payroll?

Answer. Yes, I think probably one of my motivations, if I did have them pay the interviewing house—in fact, as I recall, I think I did, now that you mention that.

I was concerned that I didn't want to be publicly identified as working for Clinton at that point, so I may have had them pay the interviewing house directly. To make sure that it was honest, I then didn't take any money for it, so it was not like a subterfuge. I was just doing my polls for free, and he was paying me, the vendor, directly.

Question. And you briefed the President and the First Lady on this poll?

Answer. As I said, yes.

Mr. LENEFSKY. Can you identify that person?

Mr. BALLEN. Phil Schiliro with the Minority staff.

Mr. LENEFSKY. Now the Majority is the minority.

EXAMINATION BY MS. COMSTOCK:

Question. Now I am the minority.

Okay. Can you continue what the professional relationship was here?

Answer. After the election, I met with the President and the First Lady during November and early December to explore working together on his 1996 campaign.

My next professional involvement with him—that is, next paid involvement—came in early December of '94 when he asked me to conduct a survey in connection with the middle class tax cut speech that he gave to the Nation in the middle of

December, to advise him on the content of that speech. I did, and I was paid for that.

And I am unsure whether I did the polling through the Melbourne, Florida, interviewing house or through Penn & Schoen, the polling company I subsequently used. I know that the third poll I did for him, which was in January, was through Penn & Schoen, but I am unsure of who was the vendor on the second poll. And I believe that the way I was paid for that poll, again, was that the interviewer was paid directly for that survey.

No, as a matter of fact, as I think about it, no, something reminded me which I had forgotten yesterday; it was Penn & Schoen for that poll. So that I went to Penn & Schoen, the interviewing firm, polling firm, and asked them to conduct the survey, and I would write the questionnaire, they would field it; they received the money from Clinton; I don't know what entity paid him; and they then paid me as a consultant to them on this polling project.

Question. And Penn & Schoen is based in——

Answer. New York.

Question. New York.

Answer. Two N's.

Question. Did you advise Mrs. Clinton at all on her health care reform policies?

Answer. Yes. A lot of our phone conversations in '93 and '94 related to that.

Question. And were you aware of any particular media efforts or fund-raising efforts directed towards media for health care?

Answer. Paid media.

Mr. BALLEN. Excuse me, Mr. Morris. I am going to object to this line of questioning on relevancy and pertinency. There is nothing in the committee's resolution authorizing the taking of depositions or in the report that remotely touches upon health care policy and any advice Mr. Morris might have given with regard to that in 1994.

We are very far afield here. We have had about 40 minutes of questioning, and Mr. Morris has already said he didn't know Mr. Huang, Mr. Trie, or the Riadys, which are the subject matter of this investigation. I haven't objected until now because I allowed counsel, except for the Watkins matter, some latitude to get into background.

At this point, discussing health care campaigning and any advice Mr. Morris gave on that, we will object as to relevancy and pertinency to this deposition.

Ms. COMSTOCK. We were talking about health care fund-raising being done as well as Mr. Morris' knowledge of any efforts to raise money for health care media campaign.

The WITNESS. Shall I answer the question?

Mr. LENEFSKY. Yes.

The WITNESS. I am not aware of any efforts to raise money for the health care media campaign. I did have occasion to speak to Mandy Grunwald, who was producing the health care ads. I wrote one or two commercials that I sent to her which she then did not use.

EXAMINATION BY MS. COMSTOCK:

Question. Were you paid at all for those?

Answer. No.

Question. Do you know—do you have any knowledge about Charlie Trie providing money for the health care funding, health care media campaign?

Answer. No. As I testified before, I know absolutely nothing about Charlie Trie except he makes good lo mein at his restaurant.

Question. In the summer of—can you recall when you worked with Mandy Grunwald on this media effort?

Answer. Sometime—I am not sure, but I think it was probably sometime in early '94.

Question. Why don't we pick up from the December '94 middle class tax cut speech and the assistance you provided there.

It is another court reporter. They just keep going out.

Answer. Okay. I then—in early December, the President asked me to become involved as a consultant in his re-election campaign, and we agreed that the relationship between us would be a private one, which is to say secret one, because neither of us were really prepared for it to be public at that point.

I wasn't prepared for it to be public at that point because most of my clients were Republicans, and I knew that if I crossed the divide to go to work for the President, that that would end my ability to work in the Republican Party, and I wanted to

be sure that it would be possible for me to give him meaningful advice and that I wouldn't just be chewed up and spit up, as previous advisers had been.

He, from his point of view, I think, didn't know if I could handle play at this level, because I had only worked with him in one State, and I think he wanted to take his time before he formally committed to me, both because any involvement with the President usually is blown up by the media, and if he brought me in and then cut off the relationship, it would appear like vacillation on his part, and bringing me in would cause him no end of grief with the liberal Democrats on his staff because of my previous Republican affiliations and my moderate political views.

I think he was unwilling to incur that political harm until it was clear that I was important to him in the campaign and would work out. So by mutual agreement, we did not publicly reveal the relationship.

We agreed that I would be paid on a poll-by-poll basis, and that the polling would be conducted by Penn & Schoen, and that I would be paid as a contractor to Penn & Schoen. That was both how I often was paid and it was a convenience so that my name would be disclosed at the time that the Federal filings took place, but not before.

To my knowledge, Penn & Schoen, when they filed, indicated that they had paid me in their filing, or at least we submitted that information to the campaign to be filed.

But had the campaign issued checks directly to me, I think the President and I were both concerned that somebody would leak that that was taking place.

Question. And you had discussions with the President about this?

Answer. Yes.

Question. What concerns did he express?

Answer. He said that he wanted—he said that he was concerned that he did not want his staff to know at that point that I was working for him, and that he wanted the relationship to be secret between us, and that was the nature of what he said. And then I said, I suggest that this is the way that you pay me so that it is not—so that we don't release the story simply by the act of somebody writing a check.

I did a survey for him in January of 1995, under this arrangement, with the survey conducted by Penn & Schoen, and then throughout the rest of '95 until the end of June, I conducted with Penn & Schoen probably five or six surveys for him, and Penn & Schoen received the payments for those.

Question. Was that on a flat fee basis then?

Answer. No. It was a cost per poll, and some polls were more expensive than others because some were longer than others.

Question. Who worked out the cost arrangements on those polls?

Answer. I worked out the charges with the President, and pursuant to that, Shoen then would bill the President for the amount we had negotiated together.

Question. So you personally discussed the payment levels with the President?

Answer. Yes.

Question. And agreed upon them solely with the President?

Answer. Yes.

Question. And then you relayed that back to Penn & Schoen, who would then bill the Clinton/Gore campaign or the DNC?

Answer. They sent the bills, as I understand it—this is second hand—to Nancy Hernreich, and I do not know what happened to them then. I don't know who paid them, when they were paid, or how they were paid. I just gathered that they were paid.

Mr. LENEFSKY. Excuse me for a minute.

[Brief recess.]

The WITNESS. My counsel reminds me that this arrangement continued until the end of March 1995. At the end of March, the President revealed to Harold Ickes that I was working for him and at that point all billings were handled directly to Harold and Penn & Schoen would send their bills to Harold.

EXAMINATION BY MS. COMSTOCK:

Question. At the White House?

Answer. I don't know where they sent it.

Question. Do you have copies of any of these bills yourself?

Answer. No.

Question. All of the billings then would have been maintained by Penn & Schoen?

Answer. Yes.

Question. And then Penn & Schoen would send them to initially Nancy Hernreich and then following that, directly to Harold Ickes?

Answer. Yes.

Question. Okay. And then you would be paid directly by Penn & Schoen after they had been paid by whoever paid them?

Answer. Yes.

Question. And your testimony is that you do not know who paid Penn & Schoen, whether it was DNC or Clinton/Gore?

Answer. That is correct.

Question. So all of the checks that you would have been getting for these surveys were all checks that came from Penn & Schoen?

Answer. Correct.

Question. And then during the time, through March of 1995 when the bills were being sent through Nancy Hernreich, did you ever discuss any aspects of the bills with anybody at the White House?

Answer. No.

Question. Or why certain matters, how the billing was done?

Answer. No. I did have to speak to the President once or twice, because they hadn't been paid, and Penn & Schoen advised me that they had not been paid, and I mentioned it on one or two occasions to the President, and then shortly after, Doug Schoen told me that they had received payment, and then he paid me.

Question. Do you know what type of lag time you are talking about in terms of payment?

Answer. I can't be certain, but I think it was in the range of somewhere between 60 and 120 days.

Mr. LENEFSKY. Excuse me.

[Counsel and witness conferring.]

The WITNESS. Yeah, right. I'm not sure how long—it was in yesterday's deposition. I saw a document from Penn & Schoen to Ickes complaining that they hadn't been paid in a long time, and actually it did—it was more than 120 days, but I don't really know how long, because it wasn't, it wasn't my bill or wasn't my company.

EXAMINATION BY MS. COMSTOCK:

Question. All right. Now, was their payment, though, contingent upon Penn & Schoen getting paid or did Penn & Schoen pay you immediately?

Answer. I think that what worked out was because the cash flow was limited that they advanced monies to me from the—once they got one or two checks, they advanced monies to me for the polling, for the future polling, because they were in a sense postponing taking their profit and paying me first. So it wasn't directly contingent, one wasn't directly contingent on the other.

Question. Okay. And when these bills were late, you mentioned that you went to the President about those bills?

Answer. Yes.

Mr. BALLEN. Excuse me, Mr. Morris. I am going to object to this line of questioning.

Counsel, I have let it go forward here for a little while because I thought it was exploring the nature of the background of Mr. Morris' relationship to the President. But I thought—and the resolution, if you can point to me in the resolution or the report where we are investigating campaign expenditure, polling expenditures, the billing of polls, whether those polls were late or paid in a timely fashion, what conversations Mr. Morris may or may not have had with the President, if these somehow constitute an impropriety or a violation of the law or fund-raising impropriety, a campaign impropriety or a violation of the law, let me know, because then I would be happy to withdraw my objection as to relevancy. But I don't—I fail to see how this is relevant or pertinent to the scope of our investigation.

Mr. LENEFSKY. May I take a 2-minute break to consult with my client?

Ms. COMSTOCK. Sure. We can go off the record.

[Discussion off the record.]

Ms. COMSTOCK. This is another Majority counsel, Greg Zoeller, Z-O-E-L-L-E-R.

The WITNESS. So Minority counsel had just objected.

Mr. LENEFSKY. What was your last question?

[The reporter read back as requested.]

Ms. COMSTOCK. Your counsel is the relevant counsel here in terms of answering questions.

Mr. LENEFSKY. I instructed him to answer the last question.

EXAMINATION BY MS. COMSTOCK:

Question. And in these discussions, what was your understanding of what the President did following your discussions?

Answer. I don't know. The bill—I don't know what he did, but I know that the payment flow improved.

Question. And what was your understanding of fund-raising activities at the White House at that time?

Answer. None.

Question. And would you get the payments within a week or so, or do you have any sense of the time?

Answer. No. There was still a lag, but since I didn't receive the payments, I didn't monitor it closely. If they were unduly late, Schoen would complain to me and I would mention it to the President, and if they continued to be late, he continued to mention it to me, and when he stopped mentioning it to me, I stopped asking him about it.

Question. Did you ever write any memos or——

Answer. I never did.

Question. Did Mr. Penn?

Answer. I saw yesterday in the deposition in the Senate some memos that Penn & Schoen had sent to Ickes in connection with the delayed payments, but that was the first I knew—it was the first I saw of those memos.

Question. This would have been after the March '95 time when the bills were sent to Mr. Ickes as opposed to sent through Ms. Hernreich?

Answer. Yes.

Question. Okay. And could you tell us when the bills started going through Mr. Ickes, did any problems arise in that context?

Answer. Well, I became convinced over a period of time that Ickes was deliberately slowing the payment process of the bills in the hopes that we would become discouraged, die of cash flow starvation and go away, and I voiced those suspicions to the President, and that was part of the process of payment being speeded.

I do recall one time, sometime in the first half of '95, where I was particularly vociferous in my criticism of Ickes to the President, and accused him of manipulating the cash flow so that we couldn't afford to continue to work for the President. Because we were—Penn & Schoen were incurring huge interviewing costs that had to be paid when the survey was done, and if the payment wasn't received for 6 or 8 months, and we were doing a survey virtually every month, they would owe hundreds of thousands of dollars that they would have paid out to the phone company and to their interviewers that they had not been reimbursed, and at some point that nut would become so large that they would have to stop doing polling. So I advised the President that that was a possibility, and then as I recall, a number of checks came through to Penn & Schoen shortly after that conversation.

Question. All right. Did you ever have conversations with Mr. Ickes about these matters?

Answer. No.

Question. You went directly to the President?

Answer. Not that I can recall. I could have, but I tended to avoid conversations with Mr. Ickes.

Question. And so you would go directly to the President about these matters?

Answer. Yes.

Question. And what was the President's response?

Answer. There was one time when he said that's just outrageous that you are not being paid for this work, you should be paid for this work; I will take care of it. Other times he would just say, I will take care of it, in a more muted tone, but once he expressed some anger that we had not been paid.

Question. Okay. Now, initially you had said you had agreed upon the payment rates with the President?

Answer. Yes.

Question. Did that continue throughout your time at the White House?

Answer. No. After—well, why don't I just do a financial narrative through the end of the time and then you can backtrack.

Question. Okay.

Answer. After March, after mid-March, the billings were sent to Ickes, no longer to Hernreich, but it was still on a poll-by-poll basis, and the costs of the poll were still agreed between the President and myself. Then, at some point, and I don't recall when, but it would have been around mid-1995, Harold secured—Harold was vested by the President with the authority to approve polling—to approve polling, and his approval was required before any poll could proceed.

Question. Is this any poll for the Clinton/Gore campaign?

Answer. Any poll that we undertook, that Penn & Schoen or I undertook at the President's request, and I was not aware then, nor am I aware now, of in the early days of who was the vendor on that poll, who was paying for the poll.

Question. So you aren't aware in the '95 time frame whether it was Clinton/Gore or DNC who was actually paying?

Answer. I'm not aware through about June of '95, before June of '95 who paid for it, roughly.

Question. Okay.

Answer. Then, at that point, the price negotiations as to what would be charged for each poll were handled between Schoen and Ickes, or Penn and Ickes, and I was no longer involved in that.

Let me just continue the polling piece of it.

At the end of June 1995, I stopped being paid as a subcontractor to Penn & Schoen and established a direct financial relationship with the Clinton/Gore campaign, which I will explain in a minute. But let me continue the polling piece straight through.

After May or June of 1995, a procedure was developed by Ickes where each poll that was conducted under this arrangement with the President would be allocated retroactively to one—either to the DNC or to Clinton/Gore, and each questionnaire was scrutinized, I gathered by Lynn Utrecht and her staff question-by-question, and a percentage of that survey questionnaire was assigned to DNC and a percentage was assigned to Clinton/Gore.

Then I gather, although I didn't actually receive the checks, that proportionate payment would be rendered by each of those committees. The reason I know this is that a bottleneck developed and Utrecht was very slow in making that assessment, and that caused cash flow problems for Penn & Schoen that I again had to go to the President over and, again, he had to speak to Ickes, and again, the bottleneck eased for a short time.

Question. So each question was allocated as a DNC or a Clinton/Gore question?

Answer. That's my understanding.

Question. And then payments would be split?

Answer. That is my understanding. Now again, I was not directly involved in it. This is secondhand.

Mr. BALLEN. Mr. Morris, Lynn Utrecht was a counsel?

The WITNESS. Counsel for the Clinton/Gore campaign.

My understanding is that each polling questionnaire had a separate ratio of the two committees.

My financial relationship changed in—starting July 1st, 1995. I became a consultant to—I became a consultant to the Clinton/Gore campaign and was paid $15,000 a month by that campaign, and that arrangement lasted until I resigned at—until I was fired at the end of August. That was one source of compensation for me.

The second source of compensation was that when advertisements were placed in connection with this process, whether by Clinton/Gore or by the DNC, a commission arrangement was negotiated for each flight of television, for each purchase of television, and those commissions were then retained at first informally and then formally, by a collection of the campaign consultants who I had brought in to work on the advertising.

When I say informally, we at some point early on we would just split the commission and then after a while we set up an entity called the November 5th Group that had a contractual division among the various consultants participating of each of the media commissions. The source of the money for those commissions, of course, related directly to who was paying for the advertising flight, so that if the Democratic National Committee were paying for it, the commissions would come from them, and if Clinton/Gore were paying for it, the commissions would come from them.

EXAMINATION BY MS. COMSTOCK:

Question. It was the same rate for each?

Answer. Yes. And that arrangement continued straight through the end of my tenure, so that I was compensated in those two forms through the commissions and as a direct consultant for the Clinton/Gore campaign.

Question. There was a commission for each flight of media and that was split among the consultants?

Answer. That is correct.

Question. And how did you determine how the split?

Answer. We negotiated a split.

Question. Was that done by you among the consultants or was that done by the White House?

Answer. Me among the consultants. We at one point, Erskine Bowles asked us what the splits were and I told him. But they were determined among the consultants.

Question. And the actual commission itself was negotiated with the White House?

Answer. Yes, between—our negotiators for that—I felt that it was unwise for me to negotiate this directly with Ickes so I appointed Mark Penn and Bill Knapp, K-N-A-P-P, as the negotiators for us, and they met with Ickes and Bowles and then Ickes and Sosnik after Bowles left, and negotiated the commissions on a flight-by-flight basis. That was very frequently an acrimonious negotiation, and on several occasions the—and there was a great deal of friction in connection with those discussions.

Question. And where did that friction come from?

Answer. Ickes trying to hold the figure down and we trying to move the figure up.

Question. And can you just describe generally some of that friction, you know, what occurred, the outcome of it?

Mr. BALLEN. I am going to object again. This is very entertaining; we have been going on for half an hour on this. But I fail to see—I am happy to withdraw my objection if Majority counsel is simply willing to state how this relates to campaign fund-raising, fund-raising improprieties, I emphasize the word "fund-raising" and possible violations of law. There is absolutely no plausible basis to articulate that there is any possible violation of law here. If there is, we would certainly be interested in hearing it because we are interested in that. But there is no issue as to coordination or anything that suggests it is a possible violation of law.

Mr. LENEFSKY. Mr. Morris is free to answer.

The WITNESS. I was never present in these negotiations, so it is secondhand, but at one point Ickes got so furious that he slammed the door of his office as deputy chief of staff and broke the door frame and contractors had to come in the next day and repair it, and there was one occasion when Ickes refused to allow the time buy to proceed unless we agreed to a lower commission rate, and we refused to agree to a lower commission rate, and the President was confronted with the decision that he would go off the air unless he resolved the dispute. And he did resolve the dispute by ordering Ickes to accede to our requests and the advertising continued uninterrupted.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall when that time frame was?

Answer. Sometime around May or June of 1996. But those kinds of disputes were relatively frequent and I believe that they were a deliberate attempt by Ickes to sew discord between myself and the President and to try to disrupt my relationship with him.

Question. Now, back in the May-June, the summer of '95 time period, did there come a time where you advocated some large media buys at that time?

Answer. Yes. When I—the President had always known during his—from the days of his relationship with me in Arkansas, that I believed the campaign should be mainly waged over television and that anything else you spend money on is more or less a waste of money, and that I believed in heavy media expenditures, heavy paid media advertising.

When he hired me back in November and December, I told him that we would have to—I said we should make this the first fully televised Presidency in American history. Literally from wall to wall, we should just be constantly on television using paid media as a new form of Presidential communication, very much like Woodrow Wilson invented when he delivered the State of the Union message in person as opposed to sending it in writing. I recall citing the ratcheting up of Presidential communications over the course of the 20th century.

But in November and December, January and February, we were so focused on the State of the Union speech, the response to the Republican contract proposals, and the development of our rhetorical theme in opposing those or in accommodating them and opposing them, that there really wasn't a lot of time for us to focus on the issue of paid media.

In early March of 1996, I began a much more insistent request for us to begin advertising, and I proposed——

Question. March of '96?

Answer. '95, excuse me. I proposed in early March of '95 that we—that the Clinton/Gore campaign purchase $2.5 million of ads to stress the President's anticrime record, and I recommended that those ads run during April. April became May, May became June, and I finally got permission to run the ads starting in the last few

days of June, and they ran throughout the month of July, paid for by the Clinton/Gore campaign.

Question. At this time were you aware that the Clinton/Gore campaign had resources to pay for this media?

Answer. I was not advised that they didn't have resources, but I was unaware until—I was unaware of the precise financial condition of the Clinton/Gore campaign until a meeting I had with Terry McAuliffe at some point during the middle of 1995, at which point he briefed me on the financial status of the Clinton/Gore campaign. And his briefing was a very optimistic one, that they were going to reach their maximum probably by the end of the year, and after that, there would be a little bit of—the end of '95, and that there would be a little bit of additional fundraising, but that would trickle in through direct mail and he wouldn't have to bother with it.

In March, April, May, June and July, I waged a vigorous campaign, not just to get on the air, but to urge the President to reject Federal matching funds. I felt that—and during the course of that period I said that the Federal matching funds which would permit only about $30 million to be spent in nonfund-raising costs in the preconvention period was an unduly low restriction and would not afford us the capacity to advertise that we need it.

I said that since we likely did not have a primary, I felt the public would be perfectly happy for us to say we don't have a primary, so we are not going to take Federal funds to fight a primary.

Particularly when budget cuts were reigning down on the country, if the President said, I would like that $11 million to go to the Head Start program instead, that that would be a very good position for him to take. I battled incessantly to get us not to accept Federal funding.

Question. And that would be so that you could have a larger media?

Answer. Yes.

Question. And you spoke with the President about this?

Answer. Frequently.

Question. So did you mainly speak with the President about it, or were others involved in those conversations?

Answer. These conversations all tended to take place at weekly strategy meetings that we held.

Question. And who was involved in those?

Answer. Okay. At the—in November of 1994, the President, the First Lady, and me. In December 1994, the same. In January of 1994, the First Lady——

Mr. LENEFSKY. January of '95.

The WITNESS. '95, excuse me. The First Lady stopped attending and she never attended again, and they would be just between the President and myself.

Starting in the middle of February of '95, Doug Schoen was added to the group and it was the President, Schoen, and myself. In about the early part of March, and I could be wrong on these dates, but roughly early March, Leon Panetta was added to the group, and at the end of March, the Vice President, Erskine Bowles, Harold Ickes, and the Vice President's chief of staff at the time, Jack Quinn, was added to the group. Quinn continued to attend meetings until he left as chief of staff for the V.P., at which point I believe David Strauss replaced him for a few weeks, and after that, Ron Klain served in that position.

Question. So once Mr. Quinn moved over to be White House counsel, he no longer attended these strategy meetings?

Answer. That is correct.

Question. Okay.

Answer. The meetings gradually expanded. I think the next expansion was in September when Doug Sosnik and George Stephanopoulos started to attend, and then the meetings expanded month-by-month, and I can't really keep track of the actual expansion. If you hand me my book, I will tell you the full list of people who attended these meetings.

Mr. LENEFSKY. It is there on Page 26.

The WITNESS. It is written in there. It would be easier than trying to remember it.

Ms. COMSTOCK. I had it marked.

The WITNESS. I can find it faster than you. I wrote it.

Okay. Eventually included in these strategy meetings were the President, the Vice President, Leon Panetta, Harold Ickes, Evelyn Lieberman, George Stephanopoulos, Don Baer, Doug Sosnik, Ron Klain, Sandy Berger, Senator Chris Dodd, John Hilley, Maggie Williams, Mike McCurry, Henry Cisneros, Mickey Kantor, Mack McLarty, Peter Knight, Anne Lewis, Ron Brown, and myself, Doug Schoen, Mark Penn, Bob Squier, and Bill Knapp.

Mr. LENEFSKY. Just for the record, it is on Page 26.

The WITNESS. And these——

Ms. COMSTOCK. Page 26 of Mr. Morris' book, which is entitled "Behind the Oval Office," is what we have been referring to here.

The WITNESS. So these discussions increasingly took place in these strategy meetings or in telephone conversations with the President.

Shall I continue with the narrative on that?

Ms. COMSTOCK. Yes.

The WITNESS. In early July of 1995, even as the Clinton/Gore campaign ads were running on crime, Erskine Bowles called me and told me that I was going to loose my battle to get us not to take Federal funds and that the President had decided that he wanted to take Federal funds, or actually Bowles predicted that would be the President's decision, and he said, I think you should come up with a plan B.

At that point, I revisited an issue that I had vaguely heard about prior to that time where I had vaguely heard that there was some advertising capability at the DNC, that there was some type of ads that could be run by the Democratic National Committee, but I hadn't focused on it until then, because I was determined to not take Federal funds and do it all through the Clinton/Gore campaign.

At that point, in the middle of July, I spoke to a number of people to learn what the laws were regarding DNC advertising. Since I'm not an attorney, and I'm not an election lawyer certainly, I had no previous knowledge of that. This was my first Presidential campaign, so I—and I never worked for the party, per se, for either party committee much, so I didn't really know it, so I needed to learn it.

I can't recall exactly who said what to me when, but among the people who I consulted to learn about it were Lynn Utrecht, the campaign counsel, Joe Sandler, the Democratic National Committee counsel, and Bob Squier, who was doing our media creation, and Bill Knapp, his partner, and they had a longer institutional memory of this because they worked for the party for many years. Doug Sosnik and Erskine Bowles as well were sources of information for me on this.

At that point, I learned that there was such a thing called "issue advocacy advertising" which could be done by the Democratic National Committee, and I was informed that that advertising had to be related to an issue that was currently hotly in play in Congress, that it had to articulate a party-wide position, not just a position of one candidate, that it had to draw a contrast between the position of the other party or the other point of view, and that it could not be expressly designed to facilitate the re-election of the President or the defeat of a particular Republican.

Well, when I heard that, I was overjoyed, because this is precisely the description of the advertisements I used to run all the time in Arkansas. In 1982, when the Governor was elected, after he had been defeated, he was confronted with the necessity of raising the sales tax on education and he came to me and said, the first thing I am going to have to do when I take office is raise taxes again. I am going to get killed for that. I said, well, what I think you really need to do is explain to the people of the State why you are doing it and what they are going to gain by it. He said, well, the press isn't covering me much on this; they don't get my message out. I said, I think you should buy advertising time explaining this, and the Governor followed my advice and did, and that became something that really he and I more or less invented. I don't think anybody had ever done it before in the country, that a sitting Governor would actually use ads to push his legislative program way away from the re-election, having nothing to do with a re-election campaign. That came a constant political strategy that he and I used in the '80s.

Then when I found that there was a law permitting precisely this type of advertising, I said great, and I went to the President and I said, you know, maybe we don't have to spend all this money out of Clinton/Gore, because all I want to do in these ads is win the budget fight. I am not particularly concerned at this point about re-election. The issue now is winning the budget fight. I told him that if he didn't win the budget fight, I would urge him not to run for a second term, that the only important thing was to win this fight.

I reminded him that he was heavily outgunned during the health care fight and ran relatively little in the way of ads, and that the ads that were run were often done by independent groups like the AFL, and the message was I felt botched by them, and it wasn't the President's message, it was their message, and it wasn't a message that—and I said, if you let me put our message on and you let me formulate the message, we can win.

EXAMINATION BY MS. COMSTOCK:

Question. Meaning the President's message?

Answer. Yes, we can win the budget fight. Parenthetically, I ought to note at this point that I had just concluded a very vigorous effort to get the President to endorse a balanced budget within a certain number of years, and most of the White House staff opposed that, and in June of '95 he overruled their objections and delivered this speech.

So my concern was that if we didn't do advertising on the budget, that the AFL–CIO would, and I was about—I was equally afraid of the AFL's ads as I was of potential Republican ads, because the AFL would say, fight these cuts, and we would go into a class warfare kind of thing and we would never talk about tax cuts as being good things or balancing the budget as being something good. I said, we have to get out the message that we are for tax cuts and we are for balancing the budget, but we are opposed to certain of the specific cuts the Republicans are trying to make, particularly in education, environment, Medicare, and Medicaid.

Question. At this time, did you have any doubt that the President was going to be running for re-election?

Answer. Oh, yes. Absolutely.

Question. In 1995, that he was considering not running for re-election?

Answer. I don't know if he was considering it, but I was sure considering advising him not to if we didn't win the budget fight.

Question. Did you ever have any discussions with the President that you thought that he was considering not running in 1996?

Answer. No, but I did tell him flat out that if we didn't win the budget fight that he might as well save himself the time and trouble, and I made clear to him that unless the Democrats and he, particularly he, won the budget fight going on in Congress, that there was no point in even looking at a re-election campaign.

So I at that point insisted and pushed hard for advertising by the DNC on the issue of the budget fight, and we retargeted——

Question. Are we talking about approximately September of '95?

Answer. July, August, and September.

Question. All right.

Answer. And we retargeted the advertising that we had done in the Clinton/Gore phase at States where moderate Republican Senators, moderate Republican Congressmen, and Republican freshmen and conservative Democrat boll weevils or yellow dogs or whatever they call them, blue dogs, lived, and targeted the media in those States deliberately to try to hold the conservative Democrats so that we could block a veto override, and to bombard the moderate Republicans so that we could break their discipline.

Question. Did these also happen to be target swing States?

Answer. Some were and some were not, many were not. For example, we advertised in Rhode Island, which is a Democratic State. We advertised in Vermont, which is too small a State to fuss with as a target. We advertised in New Mexico, which was at that point not a target State. We advertised in South Dakota, which we had no prayer of carrying. We advertised in Texas, which we never felt we could carry. So that about half of the media was aimed—was targeted based on Congress.

The other half was targeted on what we could do to most influence national public opinion, because the polling that reflected national public opinion would, I felt, be the barometer of who wins or loses this fight. We knew that in the States where swing voters lived, we would have a much better capacity to be able to influence the national polls, because it is a hard sell in North Dakota to sell a Democratic alternative; it is an unnecessary sell in Rhode Island, but you have a pretty good shot of selling that kind of idea in a State like Missouri, which is a swing State.

But the whole point of the—and at one point I submitted a memo to the President where I said these ads are reaching 97 swing Republicans, 18 swing Republican Senators, Congressmen and Senators.

At first, Ickes strongly opposed this—Ickes always strongly opposed this advertising campaign and the strategy meetings increasingly assumed the aspect of debates between Ickes and me over this. Panetta and Stephanopoulos gradually came around to the view that we should be doing the advertising, because they felt that it was the only way to win the budget fight, and I told them that I felt it was crucial that the President veto the Republican budget, and that the veto not be overridden, and that he be willing to accept a government shutdown and survive a government shutdown. The only way you are going to get the President to stand firm with this kind of courage is if there are ads running in the country and he knows that he is carrying the majority of the people with him. Otherwise, he will be perceived wrongly. He will sense it, and he will crack, and we will lose.

And after I explained that to Panetta, I think at one point I said decisively to Leon, when Clinton is on the air, he has got a lot of guts, and that was a quote, I think, and as a result of that lobbying I think of Panetta, he and Stephanopoulos

sort of switched and advocated the ads running, and that was really the key switch and with that there was a consensus for which Ickes absented himself for this advertising to proceed.

But during this entire process, it was an issue advocacy effort in just the same way as if we had advertised for health care reform in 1994, or for the stimulus package in 1993. Did it help the President get reelected? Yeah, anything a President does helps the President get reelected. Was it expressly designed for the President to get reelected and the substantive battle merely invented as a ruse? Absolutely not. Because the entire concept of Clinton's re-election had to hinge on a victory in this fight. We couldn't even reach the issue of re-election given the President's popularity numbers until we won this fight.

Question. And during the issue—well, we can come back to that. At this time when you said Mr. Stephanopoulos and Panetta changed and came around to your view, was there a discussion of a $10 million media budget for the fall of '95?

Answer. Yes.

Question. And just so—I know the Minority has expressed some concerns to date on—this morning on going into this, and I would like to spend some time talking about this $10 million budget. I think that's a lot of what we have been leading up to here in discussing, is your advocacy of that and the President's acceptance of that and others at the White House accepting that and clearly that led to some, you know, fund-raising efforts. And we have particular interest in that time frame. We would just like to go into that at some length here now, if you could.

Do you recall in early September having some meetings on this $10 million budget?

Answer. Yes.

Question. Of '95?

Answer. In early September of '95, Erskine Bowles came to me and said, you can't go on piece by piecemeal advising that we spend this amount of money and that amount of money.

By way of background, we had spent $2.5 million from Clinton/Gore in July and had spent $800,000 from DNC during the Senate—during the congressional recess in August. I pushed for that money because I wanted to hit Republican Congressmen and Senators when they went home to their districts.

Question. These were on Medicare ads?

Answer. Yeah. And I wanted people to be hollering at them about Medicare cuts so that when they got back to Washington, they would be less likely to be disciplined.

My whole hope was to break the cohesion of the Republican Majority that they could not pass a budget, that we would have to veto, and then if that failed, which it did, my next hope was to have a strong enough base of public support so that the President could veto the budget and could block its being overridden, and could win the public relations war over that, and we did succeed in that.

Question. The $800,000 Medicare ad campaign you said was paid for by the DNC?

Answer. That's right. Because they were clearly issue advocacy ads and they were entirely aimed at influencing the Senators and Congressmen during the recess.

Question. Was the President involved at all in working on that ad campaign?

Answer. Yes.

Question. Could you describe that——

Mr. BALLEN. Excuse me, Counsel. I am going to object. I think Mr. Morris has already made clear, and I am going to make clear, that there is absolutely no violation of law in regard to these kinds of activities. I am going to cite the opinions, because I want to know, and I think the Minority is entitled to know, how this violates the law and how this relates to our inquiry about campaign fund-raising improprieties.

Relevant FEC decisions, Advisory Opinions 1985–14 and 1995–25, make it absolutely clear that coordination with political parties and their candidates concerning contents of placement of advertising is entirely legal as long as the advertisements in question do not cross the line of express advocacy. Even when coordinated, party-funded ads do not constitute contributions towards expenditures on behalf of the candidate unless the ad expressly advocates the election or defeat of a clearly identified candidate for Federal office. This understanding of the law has been reiterated by the FEC and the Department of Justice in the March 1996 Supreme Court brief.

Ms. COMSTOCK. Obviously, Mr. Ballen, these are fact-based questions and the witness is someone who has information on facts and you are making conclusions before we have the facts. I am trying to find out the facts on this matter.

Mr. BALLEN. That is absolutely incorrect. You are asking him a line of questions that go into areas that are not comprehended by the resolution or by any—or the report that was under consideration here. And if you could articulate how this re-

lates to what we are investigating, I would be happy to withdraw my relevancy objection.

But I don't see how, and my consultation with the Minority members of this committee, this line of questioning—I know maybe perhaps the committee or certain people would like to relive the last election and uncover why the President won and the Republican candidate lost, but I did not understand that to be the purpose of our inquiry. Our inquiry was looking into campaign fund-raising improprieties or possible violations of law, period, not the strategy. Mr. Morris is a brilliant strategist I have no doubt, but that is not the purpose of what this investigation is supposed to be about.

Ms. COMSTOCK. Well, that includes FEC, possible FEC violations and, as you said, we have to know what the facts were so that we can know what we are talking about here.

Mr. BALLEN. The point is here you haven't articulated what the possible FEC violation could be.

Ms. COMSTOCK. If we could move on.

Mr. BALLEN. I mean, I would like to hear what possible violation. If you can articulate that, then I will stop objecting. I mean, if there is a nexus, if you have some good faith reason to believe that there were possible FEC violations committed by this witness or the campaign, lay them out and then the Minority would be happy to join in investigating any possible FEC violations, but these questions don't go to possible FEC violations.

Ms. COMSTOCK. Mr. Ballen, I think you are familiar with civil deposition practice. We are looking at anything that relates directly or indirectly. This witness has a lot of information as to how the ad campaigns which were driving fund-raising which he himself has discussed as driving fund-raising were conducted and how, the interaction between the various campaigns, and that is what we are discussing here, and I would like to move forward on that.

Mr. BALLEN. I understand that you are discussing that by eliciting the fact that he has already testified about the $10 million budget, and then you can move on from that. What the strategy of the ads were, the content of the Medicare ads have nothing to do with any possible violation of law.

Ms. COMSTOCK. We are talking about who created the ads.

Mr. BALLEN. What does that have to do with it?

EXAMINATION BY MS. COMSTOCK:

Question. If you could tell us what the President's role was in the Medicare ad that you were speaking of in August of 1995.

Mr. LENEFSKY. Answer the question.

The WITNESS. The President's level of investment in the Medicare ad, and in all of the DNC advertising, and in all of the Clinton/Gore advertising, except for the first flight of Clinton/Gore which ran in July, could be described as follows: He received drafts of the text of the ads, and he edited them, he changed them, he adjusted the wording, and he received a description, a story board description, which is a rough description, of what the visuals would be.

Subsequently, in preparing later DNC ads, the story board was replaced with something called an animatic, which is a very cheap, inexpensive simulation of what the ad will look like, usually involving borrowed or stolen footage that you couldn't put on the air, but that you could have for private use, in other words, someone else's footage that we would just dub in. So based on the animatic or the story board and the text, the President then approved the advertisement.

At that point, the advertisement would then go through a vetting process. First, it would be vetted—and I'm speaking of this ad and all subsequent DNC ads. First, it would be vetted for factual accuracy through George Stephanopoulos, Rahm Emanuel and/or Gene Sperling.

Secondly, it would be vetted for its legality by Lynn Utrecht and Joe Sandler. After a few weeks of this, Joe—I made a decision to ask Joe Sandler to actually attend the meetings at which we designed these ads, and we would have these creative meetings where the consultants would meet to design the advertisement and Sandler was literally in the room when that was taking place. Every moment when we looked at an ad, someone came up with an idea, we would flesh out the idea, and then I would go to Sandler and I would say, is this okay for DNC? And he would say, no, this goes over the line to express advocacy of a candidacy; you got to take the picture out, you got to shorten the thing. You have Clinton on for 7 seconds; he can only be on for 2 seconds. You have Dole on, but you don't have Gingrich on, so it is anti-Dole as opposed to anti-Republican leaders in Congress.

Question. You actually have seconds and times that he had this all worked down to?

Answer. Precisely. And these all flowed from a series of meetings that took place in the office of Lynn Utrecht at which present were Utrecht, Sandler, Ickes, Sosnik, me, Tom Freedman, Mark Penn, Bill Knapp. And at those meetings, and there may be some other people, sometimes Jane Sherburne came.

Question. Jane Sherburne, special counsel at the White House at that time?

Answer. Yeah. I think she was there at one or two of them. Actually, no, Jane wasn't. There was somebody else.

Question. Cheryl Mills?

Answer. Cheryl Mills was there at one or two of them.

Anyway, at those meetings, Utrecht and Sandler would lay down the law in terms of every specific part of that ad. They would tell whether we can use the President's picture, whether we can have the President speaking, how many seconds you can have the President on, whether we could use Dole, whether we could use Gingrich, and they would work on the guidelines and copy, and then those guidelines would then be enforced on an intimate involvement in the creative process by Sandler being there at every step.

So the President, after he signed off on the rough text and the animatic or the story board, this would then be resubmitted to Sandler who had been present during the story boarding and the animatics and the scripting and——

Question. Okay. And when the President—would you give him the copy? Would you physically give it to him and then he would make the changes on that?

Answer. Yes.

Question. And then who would you give that copy to?

Answer. I would then—these were typically done at the strategy meetings, and the President, the Vice President, Senator Dodd, and Ickes and Stephanopoulos and Panetta all assumed active roles in dealing with, in discussing the text of the ads.

I would then have—these meetings were generally at night, the strategy meetings. Then I would have a creative meeting——

Question. Were these Wednesday night or Thursday night meetings?

Answer. They had been called that in the press, but they were often on Monday evenings or Tuesday evenings as well.

Question. When you physically gave the documents to the President, would you take them back from him yourself, the changes that he made?

Answer. Yes.

Question. And where did you physically take those to?

Answer. Oh, you mean his handwriting? No. I would just be sitting with the ad copy and as people agreed on changes I would be making the changes, yeah. And they would be rough—they wouldn't be the actual changes, they would be the concept, because I wasn't about to time it to be sure it came in at 30 seconds while the President was sitting there.

But we got the point that, you know, this is too heavily anti-Dole, or I don't want you to use that old picture of Dole, it looks like we are using the age issue against him, or you used this word and I want this kind of sense. It wasn't a text by text thing, it was a—it was conceptual, and when it was textual, he would usually include so much language that you couldn't fit it in a 30 second spot. So I would copy all of that down, and then the next morning we would have a creative meeting with the political consultants. Attending those meetings were Bob Squier, Bill Knapp, Mark Penn, Doug Schoen, Tom Freedman, Joe Sandler, one or two members of Squier's staff, and usually one or two other members of my staff. And later in the process we were joined by the opposition research experts at the DNC.

At these meetings, we would then take the input that had been given by the participants in the strategy meeting and accepted by the President and we would then redraft the ad so that it came in at 30 seconds and it took account of their concerns. We would then also note changes in the visuals that needed to be made. Then, we would call by phone usually Stephanopoulos, Sperling or Emanuel and get their specific factual changes, if there were any factual issues. Then we would take that entire product and run it by Sandler again, and he would then say, well, this and this change you have made are over the line, you have got to pull it back, and so on.

At that point we would then come up with a text and a visual concept. I would then leave, and the actual media creators would then take that and fashion it into an ad, and they consisted of Bill Knapp, Hank Sheinkopf, who was at the creative meeting as well, and Marius Penczner, who was at the creative meeting. The three of them would actually go into the editing room and design and produce the ad. Usually Knapp would call me and would say, this ad is too long, you got to take some words out, or this doesn't work with the visual, you got to change the copy,

and again the copy would be changed. Or he would say, we don't have a particularly good visual of this, we need something of that, and we would change the visual.

Then, that advertisement, when it finished with that process, would then be put on the air without prior approval from anybody except me, and the ad would run and we would show the ad to the strategy group, which included the President, at the subsequent session of the group, usually after the ad was actually running.

So the President was heavily involved at a given point in the process, but in almost every case, the ad that ultimately ran was significantly different, both in visual content and in text, from the ad he had seen and approved several weeks—several days before. It was only one——

Question. That ad that he had approved, was it his understanding that these were DNC ads?

Answer. Yes. Clinton/Gore ads followed the exact same approval process.

Question. And during this time frame when you were doing the issue advocacy ads, were you also doing polling of the President's numbers?

Answer. Yes. But perhaps I could just summarize the content portion of it. My point about the content is that the inputs on the content were very pluralistic. There were probably 30 people or 40 people that had some role of input to the process.

Question. I understand.

Answer. And while the President had a significant role in that, it was as the first among equals, and he was not the final arbiter went on, because he never saw what finally went on because his schedule didn't permit it.

Question. Did you maintain copies of documents of these various ads as you prepared them?

Answer. No. I am not now in possession of any such documents. Bill Knapp was the one who kept those documents, because he was sort of the operating officer in charge of the ad campaign, and a number of other documents of that sort were documents that I had at my campaign office, but when I was fired, the campaign office was sealed and I have had no access to my papers since then. But you probably have a bunch of scripts lying around that office.

Question. What do you mean your office was sealed?

Answer. There was a padlock put on it and I was not permitted access to it.

Question. So your Clinton/Gore office was sealed by Clinton/Gore officials?

Answer. Yes.

Question. And could you describe what happened with that?

Answer. I don't know. I was never there; I was just told that I could have no access to it and I have never tried.

Question. And that happened immediately—in the August 26th time frame when you were leaving Chicago?

Answer. Correct.

Question. And you came back and you never were able to get into your Washington, D.C., office?

Answer. Well, I came back to Connecticut and New York, I didn't go back to Washington, but I was told it was sealed and I never tried to—I was told—I never physically went there to, you know, to challenge the padlock, but I was told it was locked and sealed.

Question. And who told you that?

Answer. Peter Knight.

Question. And what did he say to you?

Answer. Your office has been sealed, and we have had to seize the documents, and you can't have access to them.

Question. Do you know who seized the documents?

Answer. No.

Question. Do you know where those documents are now?

Answer. No.

Question. Have you heard anything about what was done with those documents?

Answer. No.

Question. Okay.

Answer. So——

Question. At the time when you—we haven't really directly addressed that, but you had said both, when you resigned and when you were fired in August of '96. How would you—how do you characterize it?

Answer. I was fired.

Question. And who fired you?

Answer. The President.

Question. And what did he tell you in terms of firing you?

Answer. He sent Erskine Bowles to say that he was requesting my resignation.

Question. And at that point you resigned?

Answer. Yes.

Question. Did anybody else talk to you about the President's wish for you to resign?

Answer. Subsequently Jack Quinn came in to talk to me as well about it.

Question. And at that time Mr. Quinn was the counsel to the President?

Answer. Yes.

Question. And what did he tell you?

Answer. At the first conversation, Erskine and I were alone and he said, the President wants me to request your—wants to request your resignation. Then I objected to that and asked them to revisit the issue with the President and several hours later, Bowles and Quinn came back and said, we have revisited the issue with the President and the President wants to offer you the alternative of either resigning or taking a leave of absence during which you will seek counseling and therapy and after that, after a suitable interval, you might be able to rejoin the campaign, and in the interim between those two meetings I had made a judgment that I needed to resign. So when they came back and offered that, I said, that's fine, I will just resign.

Question. Did you speak with the President prior to resigning?

Answer. No.

Question. Could you just tell us briefly, when you left the campaign at that time, what documents you can recall being in your office at that time?

Answer. A relatively complete or perhaps fully complete set of the agendas that I prepared for the President's review, which would be strategic documents that we used at the weekly strategy meetings.

Question. And where was your office located?

Answer. In the Clinton/Gore campaign office on 20th and M, and——

Question. Did you have an office at the White House at all?

Answer. No. So the agendas were there. Probably I would think all—my staff kind of decided what they were keeping and what they weren't keeping, so I am not fully familiar with it.

[Discussion off the record.]

The WITNESS. I am fairly certain that all of the memos from Sandler and Utrecht as to what the ground rules were for DNC advertising were there. Most likely all copies of the surveys were there. Most likely all memos that I had sent to the President, giving him advice on different topics, were there.

I would send the President four or five notes every day, short little notes, just as things arose during the course of the day, and probably most of them were there. And assorted other things, analyses of the nightly TV news, analyses of the content of local newspaper, issues memoranda on different substantive issues we were working on, a variety of things like that; nothing linked to fund-raising at all, because I never had any involvement with that.

Question. Did these memos to Mr. Sandler you said involved—would be in your documents?

Answer. Yes. The memos from Sandler and Utrecht outlining—or from Bill Knapp summarizing the conversation with Sandler and Utrecht for their approval, the memos for their approval.

But documents that laid down the ground rules for DNC advertising, we had several meetings on that, seven or eight, because as the time frame unfolded, the ground rules changed, because the circumstances changed. The Republicans had a nominee, or there were primary fights going on, and the ground rules to which we were subject evolved over that period. These documents traced that.

Question. Is that the full extent of the documents you believe were maintained in your offices?

Answer. I am sure——

Question. To the extent you can recall.

Answer. I am sure there is probably a lot of other stuff hanging around there, but that is the main stuff.

Question. Did you maintain copies of documents, notes the President had written to you, things like that, in your office?

Answer. The President rarely did that. In fact, he really—oh, yes, a lot of the things that might be there might be articles that the President sent over to me with his writing on it saying, you know, please note this, and generally those were on issues or ideas. But, yes, there would be some of those.

Question. Did you have a separate phone number for the Clinton/Gore office?

Answer. Yes, but it was—yes, there were phone numbers where one could call directly and reach my office, yes.

Question. And what was that phone number?

Answer. I don't recall.

Question. Did you have somebody who maintained your files for you at the Clinton/Gore office, or did you do that yourself?

Answer. No. Two people who did, Tom Freedman, my chief of staff, and—I am blocking out his name.

There was a guy who was on my paid staff, and I can't remember his name, who kind of was in charge of the office. I am sorry; I will remember his name.

Mr. LENEFSKY. We will provide that.

EXAMINATION BY MS. COMSTOCK:

Question. When you had mentioned your staff, can you provide the names of the other staff who were the individuals who generally were working with you?

Answer. Actually, if I can have my book?

Question. Yes.

Answer. Thank you. Just a minute.

The name of the gentleman I was groping for, who kind of ran the office, is Brian Lee, L-E-E, and my other staff members were Mary Smith, Matt Levine, and Mark Schwartz.

Question. You had said you did not have an office at the White House. Did you have occasion, though, to spend a fair amount of time at the White House in 1995 and 1996?

Answer. Yes.

Question. And where would you be physically based when you were at the White House?

Answer. Well, I never had a hard pass, so I was only——

Question. At any time?

Answer. At any time. So I would always have an appointment with somebody, and I would enter pursuant to an appointment.

Question. Who would that be? Why don't we start with initially when you started, sort of the secret phase when people didn't know you were there, who you would go to.

Answer. Nancy Hernreich, and thereafter it would depend on who I was seeing. Leon Panetta in June of 1995 had a meeting with the President and Bowles—with the President, myself, and the Vice President, and asked that I spend as little time in the White House as possible, and that I not roam the halls of the White House catching people at random, but I only go in to see specific people.

At that point, I opened an office at the Clinton/Gore campaign, and I spent most of my time either there or in my hotel. I only entered the White House or the OEOB for specific meetings with specific people, and it was not my practice to linger there.

Question. And during this time, I guess starting from November '94 time frame forward, were you staying at the Jefferson Hotel generally when you were in town?

Answer. Yes.

Question. Who were paying for those bills?

Answer. The Clinton/Gore campaign had a per diem maximum of, I believe, $185 a night, and my hotel bill was 200-something dollars a night, and they paid up to $185, and I paid the rest of it out of pocket, as well as any other expenses in connection with that out of pocket.

Question. Do you know where the bills that the hotel had—where they were sent to?

Answer. Yes. They are in the possession of my—I think they are in the possession of my assistant, and if you want me to furnish them to you, I would be happy to.

Question. That would be Tom Freedman?

Answer. No; my personal assistant, Maureen Maxwell.

Question. Okay. And how did you take those bills and then get reimbursed for them? What was that process?

Answer. Maureen would send those bills, as well as air receipts and other expenses, to Joan Pollitt at the Clinton/Gore campaign, and she would then reimburse the portion of it that the campaign deemed reimbursable.

Question. Those bills were sent to Joan Pollitt, as opposed to the consulting bills that went through Harold Ickes?

Answer. That is correct.

Question. Okay. So from the start, like in November, December, '94, those bills went to——

Answer. No. This arrangement started in July of 1995. Prior to July of '95, I received no reimbursement for expenses.

Question. So when you were staying down here, that was out-of-pocket expenses for you?

Answer. Yes.

Question. Starting in June of '95——

Answer. July.

Question. You sent the bills to Clinton/Gore?

Answer. Correct.

Question. And at any time did you learn of anyone reviewing your hotel bills?

Mr. LENEFSKY. Can we go off the record now?

[Discussion off the record.]

The WITNESS. What was your question?

EXAMINATION BY MS. COMSTOCK:

Question. Were you aware of people reviewing your hotel bills?

Answer. Yes. I became aware of that. Yes, I was aware of that.

Question. How did you become aware of that?

Answer. Ickes—well, first Ickes would send me memos objecting to things in my hotel bill, and at first the campaign was paying my full hotel bill, and then Ickes said, we will only pay it up to $185, and then I said I would like to pay the rest of it out of pocket, and he said that was okay.

And then I became aware that Ickes was reviewing them because of his feedback on them. And then I had occasion to read in the Washington Post an account which indicated that I had charged mini bar expenses and pornographic movie rentals to the campaign.

In fact, I never received reimbursement for anything above the $185, so uses of the mini bar, which were generally Diet Pepsis, were not reimbursed in any case by the campaign, nor were movie rentals of any description reimbursed.

I showed the hotel bill to the Washington Post, and it became clear there were no movie rentals on the hotel bill.

Question. Do you know who at the White House was working on that for Harold, who reviewed bills in general, whether it was the hotel bills?

Answer. No.

Question. Or the other bills sent over to Harold Ickes?

Answer. No.

Question. Do you know someone named Jennifer O'Connor who worked for Mr. Ickes?

Answer. Yes.

Question. Do you have an understanding of what her role was working for Mr. Ickes?

Answer. My only interface with Jennifer was when Harold was asked by the President to review a proposal for a public statement that I would make, an issue proposal that I would make.

Part of my job was to recommend issue positions to the President, to speeches or proposals he made, and when Ickes was charged with reviewing those proposals, as he was with some of them, he would delegate that task to Jennifer O'Connor. That was my sole involvement with her.

Question. And did you have any understanding of her being involved in reviewing bills at all?

Answer. I have no idea.

Question. I am going to return a little to the—I think we diverged a little bit when we were talking about the issue advocacy ads and whether or not there was polling done of the President's numbers.

Answer. Yes.

Question. As these ads started appearing.

Answer. We polled constantly. Every week we polled.

We polled weekly, and at the beginning that would be spelled W-E-A-K as well as W-E-E-K.

And in that polling, we had about 30 different measurements that we included every week to measure what was going on. Those included the President's favorability, the President's job rating; we would ask, whose plan to balance the Federal budget do you approve of more, the President's or those of the Republicans in Congress? Who do you trust more to balance the budget, the President or the—President Clinton or the Republicans in Congress? Who do you trust—who do you think will do the better job of holding down taxes, the President or the Republicans in Congress? Who do you think would do the best job of balancing the budget in a way that preserves our values?

Question. Were these the ads that were then broken down between DNC——

Answer. These were the polling questions.

Question. And then they would be allocated?

Answer. That is right.

Question. Part of this, though, was determining the President's general favorability numbers?

Answer. Well, what I am saying to you is, there were about 30 different questions that we routinely and repetitiously asked each week, and we tracked and monitored fluctuations in those numbers and briefed the President at the strategy meetings on those changes. One of them was the President's favorability. One of them was his job approval.

But I was giving you the list of questions that we tracked. So they were the ones on the budget; they were the ones on the tax cut.

Then we would read people summaries of the President's and the Republicans' budget positions and say, who do you agree with more? We would say, who do you blame more for the shutting down of the Government, the President or the Republicans in Congress? Who do you feel is doing the best job of protecting Medicare? Who is doing the best job of protecting Medicaid? Who is making the best job of promoting education?

We would have a whole series of questions, largely issue questions, which were designed to track how the advertisements were affecting the perception of the President's issue position vis-a-vis the Republicans.

We did not in most of these polls ask head-to-head questions at that point in that period, if only because they were too dire for us to contemplate, and also, we didn't know the name of the Republican opponent yet.

But the President's favorability or job rating were components that we reviewed to assess the progress of the weekly campaign. But they were only 2 of about 30 questions, and the other 28 virtually all related to the issue differences between the two.

Question. And then were these polls used to develop the issue advocacy ads?

Answer. Yes.

Question. Getting into the President's review of these ads, did you sometimes meet with the President, just by yourself with the President on these, or was it usually with a group of people who were reviewing the ads?

Answer. I very rarely, if ever, met alone with the President about the ads. They were either—I either met with him in the strategy group, or in '96, as the need for changing ads became more immediate, Nancy Hernreich would arrange a 10-minute gathering in the Oval Office or adjacent to it, where as many of the strategy meeting participants as could be summoned would come into the room and actually look at animatics and scripts and make a judgment there on the media. But generally these were done at the strategy meetings.

Question. And your experience with Governor Clinton, you had worked on writing ads with the President?

Answer. Yes.

Question. Is that correct? And you recall the number of anecdotes in your book about when the President's polling—I think it was in the 1990 campaign—when the President's poll numbers had fallen quickly, you had woken him up at 2:00 in the morning and wrote an ad together?

Answer. Yes.

Question. And during the '95–96 time frame, did you also write some ads like that with the President?

Answer. Well, I have tried to lay out for you—I have tried to answer that question previously. I walked you through the process, and that is the process we followed.

Mr. BALLEN. Excuse me—all right.

EXAMINATION BY MS. COMSTOCK:

Question. What was Mr. Ickes' role in this process of approving the ads?

Answer. He attended the strategy meetings and occasionally had comments on the text or the visuals in the ads, and he also had to receive final texts of the ads and a video of the ad before the ad ran.

Question. And he would have his input?

Answer. He would have made his input at the strategy meeting. I can't recall any instance in which he had any changes when he received the final copy.

Question. If we could return now to the September '95 time frame when you were working on advocating the $10 million budget, you spoke of the initial meeting with Mr. Panetta and Mr. Bowles and Mr. Stephanopoulos where they came around to your thinking on this.

What was your understanding of the President's position at that time?

Answer. Generally he was in favor of the advertising, but he was concerned about whether we could afford it, and his mind was open at that point on the question

of how much we should do and when we should do it, and he was following the debate among his advisers.

Question. And did that debate include that the DNC financial situation was not great in the fall of '95?

Answer. Not in front of me, it didn't. The President at the strategy meeting in September said, as I recall—at one point, Ickes spoke of the financial difficulties the DNC was facing, and the President said, "Hold it. I don't want to have that discussion here. We are going to have a separate meeting where we are going to focus on that."

And then there was, I have since heard, a separate meeting, to which I did not attend—I have read this in the paper—at which that was reviewed and discussed.

If you will pardon the President, the President, he recognized a Chinese wall between me and the fund-raising.

Mr. BALLEN. So you did not have any involvement in the fund-raising? Just to make that clear on the record.

The WITNESS. I had absolutely no involvement in the fund-raising at all, nor knowledge about it.

[Discussion off the record.]

EXAMINATION BY MS. COMSTOCK:

Question. Okay, we can just move along. I just have a New York Times article in April of this year which discusses some of the matters that you have been relating, some of the meetings that you have been discussing. What can you tell me about what you know about the subsequent meeting on how the DNC was going to come up with the money to pay for the $10 million budget once that had been approved?

Answer. I know nothing about what went on in that meeting. I did hear at one of the strategy meetings that the DNC had acquired a line of credit of $7 million and that it was planning to use that line of credit to help finance the advertising.

I do know that at one point in late 1995, Ickes was opposing my request for advertising money and said, "This will mean the DNC could be 7 to 9 million dollars in debt at the end of the year." And I answered, "I would rather the DNC be in debt than the Republicans win the budget fight and the DNC be dead."

But those two were the only insights I had into the DNC's financial condition during that period.

Question. Okay. Did you have any knowledge about a meeting that Mr. Ickes and Don Fowler and the President and the Vice President had on this budget shortly after it had been approved in early September?

Answer. No.

Question. On September 13th, 1995, the President, it has now been reported—and the committee received a number of documents relating to it—there was a meeting with the President, James Riady, John Huang, Bruce Lindsey, and Joe Giroir, and in this meeting one of the topics discussed was John Huang raising money for the DNC.

Mr. BALLEN. Hold it. I object. Is that your testimony? How do you know?

Ms. COMSTOCK. It has been reported that is what was discussed in those meetings. Unfortunately, some of the principals are no longer in the country, are not available, and I believe the President has said after a number of disagreements among staff that this topic was discussed, fund-raising and Mr. Huang going to the DNC, as well as there has been a fair amount of testimony in the Senate on that last month.

At any rate, at any time in or around September of 1995, did you learn that there had been some kind of fund-raising solution that had been found for the DNC?

Answer. No.

Question. Or any people that were going to be involved in raising money?

Answer. Absolutely none.

Question. Were you aware of Bruce Lindsey meeting with anybody regarding fund-raising efforts?

Answer. No. I am not trying to give a specific denial to a specific question. I never knew anything at all about how the money was being raised by the DNC. I never knew the names of the donors, the modalities that we used in raising the money, the projections of how much they expected to raise, or any of that information.

Question. So you had no knowledge of Mr. Ickes meeting with Mr. Huang at any time?

Answer. I had no knowledge of that or any other fund-raising discussion.

Question. You said you did learn about the DNC obtaining a loan regarding——

Answer. I heard at the strategy meeting—I have answered that question.

Mr. LENEFSKY. It was a line of credit, I think.

EXAMINATION BY MS. COMSTOCK:

Question. Do you know who told you about that in the strategy meeting?
Answer. It was in the strategy meeting.
Question. Do you know who raised that?
Answer. Ickes, I think, but I am not sure.
Question. Did Ickes ever raise any concern about that line of credit?
Answer. Yes, as I think I was just testifying, he said he would end up in debt at the end of the year, and that was the reason not to do the advertising. As I said, I said I would rather the DNC be in debt than the DNC be dead.
Question. It was your understanding the line of credit had been extended and Mr. Ickes was trying to cut back on how often the line of credit was utilized?
Answer. I have no idea.
Question. Do you know a woman named Janice Enright?
Answer. Yes.
Question. And do you know who she is?
Answer. Yes.
Question. Could you tell us your understanding——
Answer. She was Harold's chief assistant, Harold Ickes' chief assistant. Her office was located inside his office, their desks were joining, and she was virtually constantly with Harold, and I would deal with her frequently to get messages to Harold.
Question. And what was your understanding of what her role was?
Answer. His executive secretary.
Question. And to your knowledge, did most—if you have any knowledge—of the documents that went into Harold's office, did she deal with them generally?
Answer. I don't know.
Question. When you were at the White House, did you have any particular phones or faxes that you were supposed to use, if you indeed did use any at the White House?
Answer. No. I always charged calls to my credit card, my campaign credit card, when I made them from the White House.
Question. Did you ever have occasion to use faxes when you were at the White House?
Answer. I might have. Yes, I probably did.
Question. Do you know if you were directed to any particular faxes which you were supposed to use at the White House?
Answer. No.
Question. When you first began working with the President in late '94 and '95, you have written that when you were working on this State of the Union address, you were faxed things back and forth and there was a lot of faxes that went to the White House from you to the President. Did you have a particular fax line that you were directed to?
Answer. That I was supposed to send to?
Question. Yes.
Answer. Yes.
Question. Do you remember what the number was?
Answer. [Redacted]. But I would ask, in your final report, you not make that number public, because it still is the fax number of the President's office.
Question. I understand. Is that in his private office or in the residence?
Answer. It is in the Oval Office.
Question. And do you know if there was a fax machine in the residence that the President utilized?
Answer. Yes, there was, in the Usher's Office. I would frequently fax things to the Usher's Office as well.
Question. Do you know what that fax number is?
Answer. I don't have it memorized. I knew it and used it, but I don't know what it is.
Question. Can you recall how frequently you sent documents by fax to either of those numbers or other numbers?
Answer. Three or four times a day.
Question. In that late '94/early '95 time period?
Answer. Constantly, from late '94 through August of '96.
Question. And do you have any knowledge as to how those documents were maintained or who maintained them at the White House?
Answer. No.

Question. Would the President send you back faxes?

Answer. Yes, but not in that way. The documents I received from the President were usually memos—they were usually documents that he had—almost always they were like a magazine article or something that he had read, and stamped "the President has seen," and he would write my name next to it that I should be sent a copy of that.

The President almost never sent me any documents. It just wasn't his style, to actually put something in writing and send it to me. It was kind of a one-way street. I was sending him documents, papers, constantly.

Question. Did you maintain any of the documents that were sent to you from the White House?

Answer. A great many of them, but they are all in my office.

Question. So you maintained none of your documents, in the entire time you were working for the President, at your home?

Answer. No.

Question. Or in any other personal office?

Answer. No, except I do have an incomplete set of the agendas for the Oval Office, for the Wednesday night meetings.

Question. Those were the only documents you maintained personally?

Answer. That is right. Occasionally—a few other random documents. I think I have a copy of the draft—the initial drafts and edits of each of the State—two State of the Unions I worked on, and I have some personal notes that he sent me just of a personal nature, birthday present and stuff like that, but nothing systematic; I kept all of that at my office.

Question. And you said your assistant that you mentioned earlier, Maureen was it?

Answer. Maureen Maxwell, yes.

Question. Is she based in Connecticut?

Answer. No; she lives in Pennsylvania.

Question. So the bills that you would send for her to handle were sent to Pennsylvania?

Answer. Yes.

Question. Do you have any knowledge of what Ms. Enright's role was in terms of Mr. Ickes' interactions with the DNC, if she had a role?

Answer. None. I have no idea.

Question. You have no idea, not that she had no role?

Answer. I have no knowledge.

Question. What is your understanding of what Doug Sosnik's role was in relation to the DNC and the work you were doing?

Answer. He was the political director at the White House, and he functioned as Ickes' number two in command. By that, I don't mean his chief of staff, or that would have been Enright, but his number two professional person.

And my understanding was that he frequently transmitted instructions from Harold Ickes to—certainly to me and to the other consultants, and I have no knowledge that he transmitted them to the DNC, but it would have been reasonable to assume that he did.

Question. And what was your understanding of Mr. Ickes' control over the DNC?

Answer. That it was total; that he was the moment-by-moment, day-to-day manager of every aspect of the President's campaign, whether that campaign related to activities of the Clinton/Gore campaign or to the extent that it related to DNC activities.

I know that in my personal bailiwick we needed Harold's approval for every poll, every focus group, every mall test of ads, every production of ads, every animatic that we produced, every media buy; any expenditure of any amount of money other than petty cash, we needed Ickes' approval.

We would go about that by submitting the information to Sosnik, and Sosnik would then get back to us—Sosnik would either approve it on Ickes' behalf, which he was permitted to do by Ickes, or earlier, before he got that authority, he would go back to Ickes and would get back to us with Ickes' approval.

Question. And did you have an understanding of the President's knowledge of Mr. Ickes' role?

Answer. I believed that the President—I believed that Ickes was given this authority by the President.

Question. The President had an understanding that Mr. Ickes did have the type of control that you have described?

Answer. Yes. In general, I was under that impression. I know that specifically the President directed that Ickes was to approve all polling questionnaires and all polling expenditures in advance.

I know that because I opposed giving Ickes that authority and objected to the President over it, and the President overruled me and ordered me to deal with Ickes on the polling issues.

Question. I am showing the witness EOP 34213, which is an April 17, 1996, memo to Chairman Fowler, cc'd to Chairman Dodd, B.J. Thornberry, Marvin Rosen, Brad Marshall, Doug Sosnik, Karen Hancox, from Harold Ickes dated—the memo is dated April 17th, 1996, regarding an April 15th, 1996 meeting.

This document discusses a meeting that apparently occurred between Mr. Ickes and Mr. Fowler and Doug Sosnik, in which it was agreed that all matters dealing with the allocation of expenditures and monies involving the DNC are subject to the prior approval of the White House.

Do you know if this is the time frame when this discussion occurred, April 1996?

Answer. I have no knowledge of this document nor of this procedure, and it is my impression that the requirements that were imposed upon my consulting group predate this significantly.

Ms. COMSTOCK. I guess I can make that Deposition Exhibit Number 1.

Mr. LENEFSKY. Are you marking this?

Ms. COMSTOCK. Actually, we have to keep the documents. I think there is a different process in the Senate.

Mr. LENEFSKY. There sure is.

Ms. COMSTOCK. Document protocol does not allow us to disseminate the document.

Mr. LENEFSKY. That is a new one on me.

Ms. COMSTOCK. You can keep it to look at for now.

[Morris Deposition Exhibit No. 1 was marked for identification.].

[Note.—All exhibits referred to can be found at end of deposition.]

EXAMINATION BY MS. COMSTOCK:

Question. Are you familiar with the documents Mr. Ickes has turned over to this committee at all and the Senate committee?

Answer. No.

Question. Other than seeing them, did you have any knowledge of them before news accounts?

Answer. I don't know what documents were turned over, so I can't answer the question. There may be documents that he turned over that I know of, but I don't know that I know of them.

Question. Maybe an easier way would be, while you were dealing with Mr. Ickes, did you have occasion to receive memos on a regular basis from Mr. Ickes?

Answer. Yes.

Question. What type of memos did you receive from Mr. Ickes?

Answer. Memos which would clarify campaign procedures, approvals, memos which would lay out policies for reimbursement, memos which would be instructions to campaign staff people, things of that sort.

Question. Okay. Do you have any knowledge if Mr. Ickes maintained these types of documents?

Answer. I have no knowledge.

Question. Do you know, have you heard from any source, whether or not these are some of the documents Mr. Ickes took with him when he left the White House?

Answer. I have no knowledge.

Question. Do you have any knowledge about Mr. Ickes taking his documents from the White House?

Answer. No.

Question. On a July 18th, 1997, article in the Washington Post——

Mr. LENEFSKY. '97?

EXAMINATION BY MS. COMSTOCK:

Question. '97, I am sorry—last month, you were quoted as saying, "If Harold really unloaded, there would be a whole lot more going on now than there is. If Harold ever broke with Bill Clinton, you would know it, believe me." Can you tell us what you meant by that statement?

Answer. That it is my impression that Harold has had a long and close relationship with the President and has been privy to all of the President's political operations over a long period of time, and that if Harold—what I meant in that is that if Harold Ickes were to reveal everything that he knows, my impression is that the

time period covered and the substance covered would go far beyond the scope of the document release he was alleged to have made pursuant to the committee's request.

Question. And what type of matters are you referring to?

Answer. Matters that would relate to the 1992 campaign, that would relate to the Democratic convention and the President's strategy there in 1992, things that would relate to the President's fund-raising operations.

I believe that someone who is in Ickes' position would have access to far more material than was released pursuant—was released in connection with the document release that Ickes made after—he was alleged to have made after he left the White House.

I do not, however, know of any specific piece of information that Ickes might possess which could be injurious to the President.

Mr. LENEFSKY. Can you tell me which page you are on?

Ms. COMSTOCK. It is——

The WITNESS. Could I ask for literally a 2-minute recess? I just need to return a page. I will be back.

[Brief recess.]

Ms. COMSTOCK. Okay, we can go back on the record. Congressman Cummings has joined us. I will turn the questioning over to him.

Mr. CUMMINGS. Thank you very much.

Good afternoon—good morning, rather.

Mr. Morris, I just wanted to stop by here to ask you a few questions.

The WITNESS. Sure.

Mr. CUMMINGS. While I am a lawyer with 20 years of criminal practice, I am not here in that capacity today but as a member of the Government Reform and Oversight Committee. I am just interested in this case.

It is my understanding, over the last 2 and a half hours of questioning there have been no real questions about campaign fund-raising. While Mr. Morris has stated he has no knowledge of John Huang, Charlie Trie, the Riadys, or any other matter related to possible campaign fund-raising, it is my understanding Mr. Morris has testified about political strategy, advertising and polling, all matters of which neither this committee or the full House authorized an investigation.

Mr. Morris, I would like to ask you some questions about fund-raising that you may actually have some knowledge about.

It is my understanding you worked for the Bush campaign—is that correct?—back in 1988?

The WITNESS. Yes.

Mr. CUMMINGS. Did you work for George Bush's Presidential campaign—is that right?—in 1988?

The WITNESS. Yes. But I am——

Mr. CUMMINGS. Let me say this. If I ask you anything and you are not clear, I am sure your counsel advised you, you can ask me to rephrase it.

The WITNESS. Yes, I know. I worked to help Bush get elected, but I cannot recall whether I was paid by the Bush campaign or by the Republican National Committee.

Mr. CUMMINGS. Okay. Do you recall what your responsibilities were?

The WITNESS. Yes.

Mr. CUMMINGS. What were they?

The WITNESS. I was—I advised Lee Atwater, the campaign manager, and Roger Ailes, the media creator, on the content and timing and issues of the negative campaign against Dukakis.

Mr. CUMMINGS. And so you provided advice as far as negative campaigning is concerned; is that what you said?

The WITNESS. Yes. I had worked for Weld, who had defeated Dukakis for Governor of Massachusetts, so I was sort of the house expert on how to beat Dukakis.

Mr. CUMMINGS. Were you involved in any way or did you have any knowledge of the type of fund-raising conducted in that campaign?

The WITNESS. No.

Mr. CUMMINGS. Do you remember what Robert Mosbacher's role was in the campaign?

The WITNESS. No.

Mr. CUMMINGS. What kind of access did you have to the Vice President, Bush, during that campaign?

The WITNESS. None. I have never met him.

Mr. CUMMINGS. You never met him?

The WITNESS. Nor spoken to him.

Mr. CUMMINGS. Are you familiar with Team 100, the group of $100,000 contributors to the RNC?

The WITNESS. No.

Mr. CUMMINGS. Do you know whether any large contributors were made specific promises by the Bush administration? That is, people that contributed to the Bush campaign?

The WITNESS. No.

Mr. CUMMINGS. Would you know whether any were promised ambassadorships? That is, large contributors?

The WITNESS. No. I know as little about the Bush campaign fund-raising as about the Clinton campaign fund-raising.

Mr. CUMMINGS. All right. Let me just go to something else. I just want to go—I had an opportunity to read some documents from "Crossfire" back on March 3rd, 1997. I just want to ask you, do you remember that?

The WITNESS. I am sorry?

Mr. CUMMINGS. You appeared on "Crossfire;" is that right?

The WITNESS. Yes.

Mr. CUMMINGS. And there is a quote, and I would like you to tell me whether it is accurate or not. This is a quote that is attributed to you, and I just wanted to know whether you made this. It says, "I have sat in the room with six different currently serving Republican Members of United States Senate in their Senate offices, and they pick up the telephone, and they ask somebody for a campaign contribution." Do you remember saying that?

The WITNESS. Yes.

Mr. CUMMINGS. And can you identify who those Congresspeople were that you were talking about?

Mr. LENEFSKY. Wait a minute. Congressman, with all due respect, I don't understand the relevance of this line of questioning. Correct me if I am wrong. I thought the committee's jurisdiction was fund-raising improprieties or illegalities with regard to the 1996 Presidential election. If I am wrong, please correct me.

Mr. CUMMINGS. Well, as I sat in the committee, we said we would take this anywhere it went. And that is my understanding; it is not limited.

Ms. COMSTOCK. I think the witness may be confused, because previously Minority had objected to this line of questioning.

Mr. BALLEN. No, I did not. I objected to the question. Absolutely untrue. I objected to a question that didn't relate to fund-raising. Mr. Cummings' questions relate to fund-raising.

We have asked as well—it is well established there have been questions about 1992 and beyond.

So we also had questions about the 1980s and 1970s, what was done for President Clinton.

Mr. LENEFSKY. I would like to consult with Mr. Morris for just a moment, please.

[Discussion off the record.]

Mr. LENEFSKY. Can we have the question read back?

[The reporter read back as requested.]

The WITNESS. Yes.

Mr. CUMMINGS. And who were they?

The WITNESS. Well, after I had made the statement, the statement was a spur-of-the-moment statement in which I was in the heat of argument with Haley Barbour, and Mr. Barbour had professed shock and indignation about the Vice President's making calls from his office. And I said, "It is the routine practice of Members of Congress to make phone calls from their offices for fund-raising, and you know that." And I am under the impression that that is the routine practice.

I blurted out a figure without necessarily concocting it in my mind. Subsequently, I had an opportunity to reflect on it and figure out who I actually have seen physically picking up the telephone, talking into the phone, and asking people to do fund-raisers or to contribute money in their Senate office, and I come up with three names: Senator Phil Gramm of Texas; Senator Paula Hawkins of Florida; and at the time, Congressman Buddy Roemer of Louisiana.

Mr. CUMMINGS. Now, let me make sure I am clear on what you just said, that although you mentioned, you said—talked about six, actually there were only three that you could remember?

The WITNESS. Yes, that I could actually say I sat in their office and watched them make fund-raising phone calls.

Mr. CUMMINGS. Now, let's go back to these three people for a second. As to Senator Phil Gramm, can you remember when it was that you observed the fund-raising calls? First of all, do you remember whether it was more than one? I am specifically talking about Senator Gramm.

The WITNESS. Yes. I cannot fix a date. I had occasion to meet frequently with Senator Gramm during the Kay Bailey Hutchison campaign when she was first elected

to fill an open seat, and I was employed by the Republican Senate Campaign Committee as a consultant to them in working for the Republican candidate in that race.

As you recall, there were three Republican candidates and three Democrats, and the top two, one from each party ran it off.

But the Republicans did not have a specific candidate, so I was kind of in charge of the negative campaign against Kruger, who was the most likely Democratic opponent. And I had run a campaign that had defeated Kruger before, so, again, it was useful for me to do that.

In the course of that period, whatever date that campaign was—I even forget the year, but you can check it, when she was first elected—I was in Gramm's office a lot, like five or six or seven—five or six times, maybe seven or eight times. And it was my specific recollection that we would be meeting, and then somebody, his secretary, would buzz in and say Mr. X is on the telephone, and then I would see him lean back in his chair and say, "Hi, Charlie, how are you doing," and basically ask him either to set up a fund-raiser or to give money.

I do not recall with any specificity whether he was asking to arrange a fund-raiser or solicit a contribution, ask someone to contribute to a Republican Senate candidate, since he was head of the Senate campaign committee, or to contribute to his own campaign. But I was constantly—the meetings were constantly interrupted by fund-raising phone calls by the Senator.

Now, when Channel 7—ABC, rather—called me after this "Crossfire" and said now, can you recall whether—exactly the nature of the conversation? the gentleman—the reporter told me it would be illegal if he actually asked someone for funds; but if he asked someone to set up a fund-raiser party, that might not be illegal; and if he asked him to give money to another person, another campaign, that might not be illegal. And I can't recall which of those activities the Senator engaged in.

Mr. CUMMINGS. Now, when you said you were in his office, was this here in Washington?

The WITNESS. Yes, in his Senate office in the—I believe it is in the Russell Senate Office Building.

Mr. CUMMINGS. With regard to Senator Gramm, when you saw this take place, did you comment on it at all?

The WITNESS. No.

Mr. CUMMINGS. Within the office?

The WITNESS. No. It is my understanding that this is——

Mr. LENEFSKY. The answer is no.

The WITNESS. The answer is no.

Mr. CUMMINGS. So can you tell us about the circumstances, what you observed with regard to Buddy Roemer.

The WITNESS. He was a candidate for Governor of Louisiana in 1983. At that time he was a Democrat, he has become a Republican subsequently, and I was a consultant on his campaign.

And, once again, I recall strategy meetings with him being interrupted by callbacks from contributors where he would take the call and he would discuss a campaign contribution or a party or some fund-raising issue in the middle of the meeting that I was having with him.

I recall these because the interruptions were annoying to me and I just wanted to have my meeting and not have to sit there and listen to phone calls.

Mr. CUMMINGS. And where did those calls take place?

The WITNESS. From his congressional office in one of the House office buildings.

Mr. CUMMINGS. And Paula Hawkins?

The WITNESS. I worked for Senator Hawkins on her initial election campaign in 1980 and her re-election in 1986, and during the period of '85 and 1986 I met with her almost weekly in her Senate office, and I recall her making calls in connection with fund-raising from that office.

Mr. CUMMINGS. I want to go back to Phil Gramm for a second. You said that you heard the callbacks. Did you hear—did you observe any calls being made with regard to fund-raising, if you can recall?

The WITNESS. No. I don't think that he actually interrupted a meeting with me to say, please wait while I call this person. I think what would happen is that his secretary would buzz him and say, Mr. Jones is returning—is on the line, and then he would speak to Mr. Jones, and I inferred that it was a callback of a call he had originally placed. It might not have been.

Mr. CUMMINGS. Now, would that be the same for Paula Hawkins?

The WITNESS. Yes.

Mr. CUMMINGS. So you don't recall—you don't remember hearing or seeing her actually make a call out.

The WITNESS. That is correct.

Mr. CUMMINGS. Now, are you aware of any other instances where Congressmen have engaged in fund-raising phone calls in their congressional offices?

The WITNESS. I have never directly witnessed that, but it is my impression that it is the routine practice engaged in by, as I have said, the vast majority of the House and of the Senate.

Mr. CUMMINGS. Back on March 3rd, 1997—let me go back to what you just said. Is there—I mean, when you say it's your—you said it's your impression——

The WITNESS. [Affirmative nod.]

Mr. CUMMINGS. Strike that. On March 3rd, 1997, the edition of "Crossfire," you said, "Every single Republican Senator spends about 80 percent of his time, including Senator Nickles, raising money, from those high-back chairs in the United States Senate office." What did you mean by that?

The WITNESS. Well, some of it might have been hyperbole. I don't know if United States Senators spend 80 percent of the time while they were in their office making fund-raising phone calls. It is my impression that when candidates are up for re-election, Congressmen or Senators, they end up spending, if they are in contested races, sharply contested races—they end up spending a huge proportion of their time dealing with fund-raising, and they—and my impression is that a vast amount of that is from the Senate office.

As I'm saying that, I recall that—I recall learning from somebody that Senator Cranston was legendary for sitting in his office and making millions of phone calls—thousands of phone calls to donors. I remember at one point someone telling me, I don't remember who, that Cranston would literally treat his office like a fund—his fund-raising headquarters.

So I was expressing on the program that when Senator Nickles, in particular, expressed shock that the Vice President was doing it, was making calls from his office, I think on the program I said it was akin to the scene in the movie "Casablanca" where Humphrey Bogart, with a French cop, bursts in and says he was shocked to hear that gambling is going on, and the hotel clerk interrupts him and says, "Here are your winnings from last night, sir."

Mr. LENEFSKY. Claude Renee?

The WITNESS. Yeah, that's it.

Mr. CUMMINGS. I think back on that program you also said that six Members of the Senate, including half of the Republican leadership—do you remember that?

The WITNESS. Yes. What I had in mind when I said that was, Phil Gramm was part of the leadership and I did not—it was hyperbolic.

I have been asked in the past whether that included Trent Lott, because I have been Senator Lott's consultant and I have said on the record and would affirm now that I have never seen Trent Lott make a fund-raising call from his office. I suspect that that's largely because he has never had to.

Mr. CUMMINGS. You worked for Congressman Dickey also?

The WITNESS. What?

Mr. CUMMINGS. Congressman Dickey.

The WITNESS. Yes, Jay Dickey.

Mr. CUMMINGS. And when was that?

The WITNESS. In 19—in his 1994 re-election campaign.

Mr. CUMMINGS. And what were your responsibilities there?

The WITNESS. I did his polling and oversaw his advertising.

Mr. CUMMINGS. Do you remember whether Congressman Dickey made any fund-raising calls from his office that you would know of?

The WITNESS. I remember that he did not.

Mr. CUMMINGS. Okay.

The WITNESS. I only met with him two or three times in his office in Washington, and most of the rest of our meetings were in Arkansas, and I know that those meetings in Washington were not interrupted by fund-raising calls.

Mr. CUMMINGS. Did you do any kind—type of fund-raising for him?

The WITNESS. No.

Mr. CUMMINGS. You worked for Senator Helms, too?

The WITNESS. Yes.

Mr. CUMMINGS. And when was that?

The WITNESS. In his re-election campaign of 1990.

Mr. CUMMINGS. And what were your responsibilities with Senator Helms?

The WITNESS. I conducted some of his polling and advised him on his advertising.

Mr. CUMMINGS. Now, do you recall him making fund-raising calls from his office or receiving callbacks?

The WITNESS. No. I only met with Senator Helms once, which was in his Senate office. It was a meeting of about an hour, and that was the only time I have ever

seen Senator Helms. He did make no fund-raising phone calls. My contacts were with his campaign staff in North Carolina.

Mr. CUMMINGS. So you had nothing to do with any campaign fund-raising for him; is that correct?

The WITNESS. That's correct.

Mr. CUMMINGS. Are you aware of whether anyone affiliated with the 1990 Helms campaign provided information to the Christian Coalition about needs, plans, or projects on the campaign?

The WITNESS. No.

Mr. CUMMINGS. So you have no knowledge of that whatsoever?

The WITNESS. That's correct.

Mr. CUMMINGS. Give me one second, please.

You worked for Senator Wilson; is that right?

The WITNESS. Yes, but I worked for him only in his campaign to be elected to the Senate. I never worked for him after his election to the Senate. When I worked for him, he was mayor of San Diego.

Mr. CUMMINGS. And what did you do for him?

The WITNESS. I worked on his polling and on his advertising.

Mr. CUMMINGS. So as far as fund-raising is concerned, nothing?

The WITNESS. No connection at all to his fund-raising.

To spare you, I would be happy to list my Republican clients, but I have never worked on anybody's fund-raising in either party. It is not what I do, and I know nothing about it.

Mr. CUMMINGS. So you don't even get involved in that at all?

The WITNESS. That's right. There are occasions, and there have been candidates, none of the ones you mentioned, where I am invited to speak at a fund-raiser to urge a candidate's donors to give money. I did that, for example, for Warren Rudman when he was running for the Senate for the first time. But I never know who is in the audience, I never view the invitations, and I never receive the checks or raise the money, I just give a speech as to why I think he can win.

Mr. CUMMINGS. You generally paid close attention to television advertisements, ads by the Republican Party and its candidates for President in 1995 and 1996, didn't you?

The WITNESS. Yes. Rather close attention.

Mr. CUMMINGS. And why was that?

The WITNESS. Well, I was running the President's advertising, so I needed to know what the other side was doing.

Mr. CUMMINGS. So you personally reviewed many of the Republican television spots in 1995 and 1996?

The WITNESS. Yes.

Mr. CUMMINGS. And when you would review them, what were you reviewing them for?

The WITNESS. To find out what they were saying about President Clinton so that I could respond to them in the President's advertisements.

Mr. CUMMINGS. Do you recall seeing "Dole for President" spots during the Republican Presidential primary?

The WITNESS. Yes.

Mr. CUMMINGS. One of Dole's ads was a biographical spot produced by Don Supple. Do you remember that?

The WITNESS. Yes.

Mr. CUMMINGS. And does—I mean, can you tell us about it, as best you can?

The WITNESS. Yes. I believe what you're referring to was a 60-second advertisement that was run by the Republican National Committee under the same rubric of issue advocacy advertising that the Democrats did for President Clinton.

It was notable in my recollection because it systematically violated every single one of the ground rules that Lynn Utrecht and Joe Sandler, the counsel for the campaign and for the Democratic Committee, had laid down for us and that we had to abide by.

It was a spot that had absolutely no issue content at all. It was a warm and fuzzy biographic spot talking about where Senator Dole grew up and his background and his war record and a lot of things like that, and it had no reference that I can recall to issues at all.

I remember being outraged by it, and I called Utrecht and Sandler, and I said, why are we being barred—I wanted to run an ad for Clinton that talked about—that he was born poor, that he worked his way up, that he went to school on scholarships, and flesh out some of his background so that we could present that.

I was told by Utrecht and Sandler that if we did that, it would have to be out of Clinton/Gore because it was not issue advocacy, and I accepted that. But then when Dole did the exact same thing, I said, why are you unilaterally disarming us?

I would like to state, in answer to your question, a little more broadly, that whereas the Clinton—the Democratic National Committee ran about $30 million of advertising that were issue advocacy ads, the Republican National Committee ran between 20 and 25 million dollars of advertising for Dole, which were issue ads, and whereas the Clinton/Gore DNC issue ads—that is, the DNC issue ads that I supervised—were run largely during the budget fight, the Republican ads were run—80 percent of them were run after June 1st, 1996, when it was clearly re-election ads. During much of it the Congress wasn't even in session, so there wasn't even an issue advocacy possible.

So I do want to point out that all of the accusations that have been made about the Democrat issue advocacy advertising being thinly-veiled re-election commercials, which I believe not to be true in our case, were overwhelmingly and abundantly true in the case of the Republicans.

Mr. CUMMINGS. So you really are concerned about that, huh?

The WITNESS. What?

Mr. CUMMINGS. You sound like you got very upset about that.

The WITNESS. I got very concerned when, in the last 3 months before the Democratic convention, we were being outspent by 3-to-1 on issue advocacy ads by the Republican Party.

I also was interested to note in the Washington Post today that the Democratic Party spent 122—raised $122 million in soft money and only $14 million of that went to the advertising campaign. We spent $45 million in pre-convention ads, 15 from Clinton/Gore, 30 from DNC, and of the 30 from DNC, $16 million was hard and $14 million was soft. So the parent to the advertising campaign was only responsible for about 11 percent of the total expenditures of soft money by the DNC.

Mr. CUMMINGS. Now, you said you did run a biographical ad on Bill Clinton; is that right?

The WITNESS. No, we never did. I wanted to, but we couldn't unless it was Clinton/Gore money, and we elected not to do so.

Mr. CUMMINGS. And the 1995–1996 DNC issue advertisements, I take it that they focused on legislative issues; is that right?

The WITNESS. Yeah, they were overwhelmingly focused on the budget fight, and they exclusively related to the contrast between President Clinton's plan and the Republican plan to balance the budget, and they would summarize the salient elements of each and advocate the President's plan as opposed to the other plan.

For example, I remember that we could never use the name "President Clinton," we had to say, President Clinton, apostrophe s, plan—"President Clinton's plan"—because it had to be related to the substance of the issue rather than the personalities involved.

Mr. CUMMINGS. Now, you just laid out—the answer you just gave, you said it had to be, and what are you basing that on? What were the ground rules, and where did those ground rules come from?

The WITNESS. Lynn Utrecht, the campaign counsel, and Joe Sandler, the DNC counsel, had presided over a series of meetings at Lynn Utrecht's office, the sole purpose of which was to discuss what was permissible in DNC issue advocacy advertising and what was not. They laid down rules that were subsequently incorporated into memoranda that was circulated that provided the ground rules as to what we could or couldn't include.

Further, Mr. Sandler was present at each of the creative meetings where we worked on developing these ads and constantly was editing and fine-tuning the most minute details of the advertisements, text and visuals, as well as its placement, in order to observe those ground rules.

For example, I was—we were instructed that Democratic National Committee issue advocacy ads could not run within the 28 days prior to a primary contest in a given State, and that if we chose to advertise within 28 days of the primary, even though Clinton was unopposed in the primary, we would have to use Clinton/Gore money.

So, for example, we would refute—we couldn't advertise in the Philadelphia media market during the New Jersey primary, the Pennsylvania primary, and the Delaware primary. Even though the Delaware was just a minute little portion of the Philadelphia media market, we couldn't be on in the entire media market for the 28 days before the Delaware primary, because of Joe Sandler and Lynn Utrecht's rules.

The Republicans, on the other hand, ran their issue advocacy advertisements on cable throughout this entire process and in Washington, D.C., throughout the whole

country, regardless of when the primaries were taking place, and in the D.C. media market, even though it was run on occasions that were proximate to the Maryland, D.C., and Virginia primary dates.

Mr. CUMMINGS. Help me with something. I'm just curious. What—you keep referring to Joe Sandler, and I think he was the general counsel for the DNC. Is that right?

The WITNESS. Yes.

Mr. CUMMINGS. When you began your work with President Clinton, were there discussions with regard to what your relationship would be with regard to Joe Sandler as far as advice? I mean, were there guidelines set out from the very beginning? because it sounds like Joe Sandler was very much involved in what was going on here, and I was just wondering, how did that relationship start with regard to you?

The WITNESS. When the advertising—when the decision was made by the President to engage in issue advocacy advertising through the Democratic National Committee, Sandler and Utrecht were appointed as a—by the President and Ickes to be a group—to be the arbiters of that campaign and to set the rules, the legal rules.

And then I suggested that rather than make that an ex-post-facto review of the script or of the spot—not ex post facto, but a last-minute review before it went on the air, which would inevitably cause major revisions and delays, that we actually take the unprecedented step, from my political career, of actually having the DNC lawyer, Sandler, sit in meetings so that he was present at every instant while the ads were being developed and, rather than just give this commentary at the end, would comment literally as we had the visual on a freeze frame, and he would say, you are leaving that on for 4 seconds, you can only put it on for 2 seconds, or that ad says President Clinton, it's got to say President Clinton's plan, or that picture is Bob Dole's picture and Bob Dole has retired from the Senate and you can no longer use Bob Dole's picture in your ads, because he is not a Senator anymore, and therefore you cannot be engaging in legislative advocacy by using his picture.

Those are all specific examples of the kind of ruling that Sandler insisted upon while we were actually creating these advertisements.

Mr. CUMMINGS. So the kind of meeting that you just spoke about, would that be considered a creative meeting? Is that what they are called?

The WITNESS. Yes.

Mr. CUMMINGS. And you said—I think you used the word "unprecedented" for you.

The WITNESS. Yes. I had never had a lawyer in the room when I'm writing ads. It was a unique experience.

Mr. CUMMINGS. And why did you have a lawyer in the room here? I mean, why were you——

The WITNESS. Because we were instructed by the President to follow the specific advice of the attorney in the DNC advertising so that we did not engage in any advertising that was over the lines drawn by the Federal Elections Commission.

Mr. CUMMINGS. So I take it that Sandler and——

The WITNESS. Utrecht.

Mr. CUMMINGS. Newtrecht.

The WITNESS. Utrecht—U.

Mr. CUMMINGS. Were engaged in all of these creative meetings.

The WITNESS. No. Only Sandler was, but Utrecht, in addition to Sandler, cleared all scripts and all visuals before the advertisements were permitted to run.

Mr. CUMMINGS. And I take it that you, a few questions ago—answers ago, you talked about the detail of looking at each advertisement as it was developed. Was that the process that was—was that the pretty much consistent process, for Mr. Sandler to look at every single aspect of the ad?

The WITNESS. Yes. It was not pretty much consistent, it was completely consistent. Not a single DNC ad was ever run where Sandler was not intimately involved from the very beginning in the formulation of the ad, except for the first ad that was run in August, which was before there had been that kind of input. But Sandler and Utrecht approved that ad before it went on.

Mr. CUMMINGS. Now, did there ever come a time when you disregarded Mr. Sandler's advice?

The WITNESS. No.

Mr. CUMMINGS. Why not?

The WITNESS. Because I wasn't allowed to. My instructions were that I had to obey every ruling of Sandler and Utrecht, and I did, down to the last detail.

Mr. CUMMINGS. I just want to go back to just one thing for a second. We talked about the Republican ad, the one that you were kind of concerned about.

The WITNESS. The Dole ad, yes.

Mr. CUMMINGS. Do you believe, based upon—I mean, apparently you had some concerns, and I take it that you don't believe that they met the letter of the law.

The WITNESS. I can't comment on that, Congressman, because I'm not an attorney. They certainly went far over the line that was drawn for us by the counsel to the Democratic National Committee. I don't know if his opinion was accurate, but if he were their counsel, he wouldn't have let them do any of the things that they did.

Mr. CUMMINGS. When you—let me talk about Joe Sandler a bit, just ask you a few questions.

You gave us examples of things where Sandler said, look, you have got to stay within a certain situation, and I think you referred to the State races and the media markets and whatever.

The WITNESS. Yes.

Mr. CUMMINGS. Were there other examples of what—of when Mr. Sandler said, look, you got to stay in this box?

The WITNESS. Yes.

Mr. CUMMINGS. Can you give us some examples of those instances?

The WITNESS. Before he would let us do an advertisement on a subject for issue advocacy, we had to establish that the subject was a current subject of political controversy in the U.S. Congress, not simply that a bill had been introduced but that it was actually before the Congress in an active and aggressive way.

So, for example, after the welfare reform legislation was passed and signed by the President, we could not run ads on issue advocacy relating to welfare reform, because it was no longer a question before the Congress; it had been passed. Even though the President continued to want changes in that legislation modifying the cuts, we were not permitted to address that in the advertising. We were only permitted to address topics that were front stage before the Congress.

Another example was that we were required in our attack, whenever we presented Dole's picture, to present Gingrich's as well, and whenever we mentioned the name "Dole," we had to also mention the name "Gingrich," to emphasize that we were mentioning the name "Dole" not in the context of his Presidential candidacy but in the context of his position as majority leader in the Senate.

As another example, Sandler and Utrecht, when it looked as if Lamar Alexander might be the Republican candidate, they told me at that point that we could not mention Lamar Alexander's name in our issue advocacy ads because he was not a Member of Congress and had not been a Member of Congress and was not—didn't have—and even though he had positions on the issues before Congress, he was not a participant, and therefore we could not mention his name.

At one point, I was terribly concerned that if he were the nominee, he would be able to use issue advocacy ads to attack Clinton because we were President but we could not use issue ads to attack him because he wasn't in Congress.

Those are all examples. I could literally give you 50 more.

Mr. CUMMINGS. Well, what about as to the Dole ad—and I know you're not a lawyer, but based upon your knowledge of what you—the ground rules that you were working under, can you give us examples of the things that concerned you there?

The WITNESS. First, that they—well, all I can tell you is examples of what they did that Sandler wasn't letting us do.

Mr. CUMMINGS. I understand.

Mr. BALLEN. You mean the RNC, sir?

The WITNESS. The RNC. First, the RNC advertised in States immediately prior to their primaries; we did not; the DNC did not.

Secondly, the RNC permitted biographic ads to be run that had no issue advocacy by the RNC; the DNC was not permitted to do that.

Thirdly, the RNC ran an advertisement that showed Bill Clinton saying, "We can balance the budget in 7 years," and then there were films clips of him giving different time deadlines: We can balance it in 10 years, 7 to 10 years, 8 years. And there were film clips of Clinton contradicting himself on when the budget would be balanced. It did not indicate the Republican position on the issue; it did not discuss the President's position on the issue; it was a negative ad out of the blue.

We would never have been permitted to run that ad. We would have had to state what our position was and what the conflict was.

So there were, long after—long after the welfare bill had been passed, the Republicans were running ads attacking Clinton on welfare reform with DNC—with RNC funds paying for it, and we were not permitted to reply to it effectively because we could not address that with a DNC ad, we had to use Clinton/Gore ads to deal with welfare reform, because it was no longer in play before the Congress.

I would go to Sandler and I would say, "They are running an ad attacking us on welfare reform with an RNC label. Why can't we reply to that ad with a DNC label?" And he would say, "You can't."

I actually had occasion to—at some point, to speak to the President and say we were being unilaterally disarmed by Utrecht and Sandler and being required to be held to a standard that the Republicans were nowhere near approaching. I said, "Mr. President, we are being outgunned 3-to-1 here in quantity and we are fighting with one hand tied behind our back because of the"—"our inability to do what they are doing, what the Republicans are doing." He said to me, "I don't care. Follow their instructions."

Mr. CUMMINGS. I'm just curious, did you ever go to Sandler and Utrecht and say look, guys, basically what you just said? Did you ever say, look, you got—I mean, our hands are tied behind our backs?

The WITNESS. Constantly. I recall one meeting with Utrecht where we had one of these legal meetings where we literally screamed at each other. I shouted at her. I said, "You are deliberately trying to sabotage this advertising campaign because you are a pawn in a tool of Harold Ickes"—Ickes was there—"and you are using this legal fiction that you are developing as a tool of emasculating our advertising campaign because Ickes opposes it and you are following his orders."

And she screamed back at me that that was outrageous accusations, Ickes was furious, and everybody's tempers cooled after a little while, but it was tremendous friction of my resentment against what I considered to be their unreasonable imposition of rules that the other side wasn't following.

I was perfectly willing to follow their rules, but only if the other side did, and when the other side broke them, I didn't see any reason that we should be subject to them. But we were, and we continued to be, and I didn't like it one bit, but I had to follow it.

Mr. CUMMINGS. I take it that you had—you just used a term that I hadn't heard before in your testimony. You used the term "legal meeting."

The WITNESS. Yes.

Mr. CUMMINGS. Is that what you said? So I take it you had the creative meetings, which was creating the ads, and then there were legal meetings.

The WITNESS. Yes.

Mr. CUMMINGS. What are legal meetings?

The WITNESS. I testified on that earlier.

Mr. CUMMINGS. Oh, I'm sorry.

The WITNESS. It's okay. The legal meetings included Ickes; Sandler; Utrecht; Cheryl Mills; sometimes Jack Quinn; sometimes Ron Klain; myself; Tom Freedman, my chief of staff; Mark Penn, our pollster; and Bill Knapp, our media creator; and also the gentleman who was our time buyer-,—I forgot—Jamie Sperling I think was his name, our time buyer who worked for Squier, and we had six or seven of those over the course of the campaign.

Every time the campaign entered a new phase, the primaries were here, or Dole was the nominee, or the budget, you know, different phases as the campaign progressed, when the circumstances changed, we would have a meeting to outline the ground rules of the new situation.

Mr. CUMMINGS. Going back for a moment, I guess you felt kind of pressured with the President over this whole issue of counsel restricting you and——

The WITNESS. Yes.

Mr. CUMMINGS. That really bothered you, huh?

The WITNESS. Yes.

Mr. CUMMINGS. And the President's—it was basically almost, from what you said, when you told the President, look, our hands are tied behind our backs, I take it that there was very little discussion, except you got to follow the law?

The WITNESS. Yes.

Mr. CUMMINGS. So did you get the impression from your discussions with the President when you complained that he had full confidence in these two counsel?

The WITNESS. Yes.

Mr. CUMMINGS. I don't have anything more. Thank you very much.

The WITNESS. Thank you very much. Good to meet you, Congressman.

Mr. CUMMINGS. My pleasure.

The WITNESS. Hey, off the record.

[Discussion off the record.]

EXAMINATION BY MS. COMSTOCK:

Question. Were you familiar with many of the various campaign accounts that were being used to pay for ads by the RNC?

Answer. No.

Question. Were there any written legal opinions regarding the rules of issue advocacy ads that you discussed?

Answer. Yes.

Question. And would those be some of the documents that I think we previously discussed would be at your office?

Answer. Yes. There are other places they would be. Lynn Utrecht would have them, Joe Sandler would have them, and most likely Bill Knapp of Squier, Knapp, Ochs would have them.

Question. Were there discussions over the use of coordinated accounts?

Answer. No. There were—with one exception, which I will get to in a minute, we were—I was never involved, nor were—to my knowledge, were any member of our media team, ever involved with the formulation of any coordinated expenditure—any independent expenditure.

That's what you mean, right? Not coordinated, but independent expenditure by the AFL, or any other—Sierra Club or any other group.

Am I responding to your question? You said "coordinated." It just dawned on me.

Question. The coordinated accounts.

Answer. I don't understand the question.

Question. Talking about the coordinated accounts run by the States and the soft money that——

Answer. Oh, yes, I did know about that. There was—we were informed at some point in September or October, I believe, of '95, I believe by Ickes, that when a State party ran an ad, under its disclaimer as opposed to the Democratic National Committee, the ratios of hard and soft money were less—were less onerous, and I was informed at that time that we had no problem having enough soft money, but the hard money which was Federal money was a problem, and that if the ad were run by the State party, you had to have less hard money in it.

Therefore, we were requested to prepare separate ads for each State party. The media people would then prepare an ad sponsored by each State party. There would be a separate disclaimer line for each State party, and the ads would be identical except for a different disclaimer, and therefore the buy was technically 30 or 20 separate buys, one for each State. I was aware of that.

Question. These were generally the same ads?

Answer. They were always the same ads.

Ms. COMSTOCK. Okay. I'm showing the witness DNC document 310398 through 701. I may have given somebody my copy, I'm sorry. Can I check these again? I'm sorry.

[Brief pause for document examination.]

EXAMINATION BY MS. COMSTOCK:

Question. The front page of this is a handwritten note, apparently Don Fowler of October 12th, '95, and it's attached to an information sheet in the memo to Bill, Bill somebody. It says, "Thank you for returning my call today. Attached is an info sheet about our efforts to raise money to fund 10 million of paid TV ads over an 8-week period during October and November. This effort is at the specific direction of the President."

Was that your understanding of this media buy in October of '95? Was it at the specific direction of the President?

Answer. Yes.

Question. And it continues, "We would like for you to give some more, if you can, but more important, get some others to help. We really need another $250,000. Thanks, best wishes, Don."

Then it is attached to a memo that is to Chairman Don Fowler from Squier, Knapp, Ochs Communications, and that memo is dated October 5th, 1995.

Were these the kind of State buys that you're referring to that you were discussing just a moment ago?

Answer. Yes.

Mr. BALLEN. Could you ask the witness if he has ever seen this document before?

The WITNESS. Are you asking me? No, I have never seen this document before.

Ms. COMSTOCK. I am asking if this is the type of media buy that you were talking about.

The WITNESS. Yes.

EXAMINATION BY MS. COMSTOCK:

Question. Okay. And the States outlined here the States for an early October media buy, October 3rd through October 12th, '95; is that correct?

Answer. Yes.

Question. I think earlier when we discussed some of the States, you had mentioned Vermont and Rhode Island as being among the States that were selected. Di-

recting your attention to DNC 3103700, at the bottom, it talks about—under New York, it has "Burlington-Plattsburgh market." Was that the Vermont reference——

Answer. Oh, Burlington. Yes, of course, Burlington, Vermont. Right, that is correct.

Question. To your knowledge, does that market also expand into New York State?

Answer. Yeah, but very limited. They really should have listed Vermont; it gets virtually all of Vermont.

Question. And then on Rhode Island, does that market, the Providence market, extend at all into the Connecticut area?

Answer. A small amount. This document illustrates the point that I was trying to make, that these buys were primarily targeted at Republican and conservative Democratic Senators or Congressmen.

The Arkansas buy was not targeted at individual Senators, but there was a Republican Congressman from Little Rock who we were targeting.

In California, I don't recall the Congress people from these markets, but I think that's how we arrived at these markets.

In Colorado, we were targeting Nighthorse Campbell to hold him as a conservative Democrat, and we had high hopes of breaking off Hank Brown.

Again, I'm afraid I don't recall the names of the Congressmen, but I do know the Senate strategy.

Question. Was Colorado also a swing State in '96 that you were focusing on for the President?

Answer. It is, but it is not the reason—well, yes, it is, and that is part of the reason it is included here, not because it was a swing State we were focusing on for the President, but because when we are trying to move national poll numbers, the best place to move them is in swing States.

When you have a State that is determinantly Republican or determinantly Democrat, you are going to have less movement on national polling numbers on the budget packages if you go into those States than if you go into swing States. But most of this buy was particularly animated by a desire to move Congressmen.

We were in Iowa because the Republican primary was in Iowa, and we felt that if we could make Iowa hate the Medicare cuts, Dole would find it difficult to push those cuts, because he had to win the Iowa primary.

In Illinois, these markets correspond to Congress people who we were attempting to target. If we were attempting to do Illinois, we would push Chicago as a swing State, but we were trying to hit Congressmen.

Kentucky, we were trying to hold Ford and we were trying to get at McConnell.

Louisiana, we wanted to make sure that Bennett Johnson was not tempted to vote for an override and that Breaux was not tempted.

In Maine, which, goodness knows, is not an important State in a Presidential contest, we were going after Olympia Snowe, and I forget who the other Republican Senator was from Maine at that point.

Question. Senator Cohen?

Answer. Senator Cohen, of course, the two liberal Republicans we had a pretty good shot at.

Michigan, that was much more to hold the Democrats.

Minnesota, we were targeting both for congressional reasons and for Senate reasons.

Missouri, I know we had an extensive discussion about the chances of moving Ashcroft to support the budget—the President's budget.

In New York, these are tiny New York markets, and the goal was to make it hard for D'Amato, whose political base is upstate New York, to support the budget and to move over people like McHugh and Houghton and other moderate Republicans.

In Ohio, we were attempting both to make sure that we could hold Glenn's support on this issue and to give us a realistic shot at DeWine.

In Oregon, that was exclusively dominated by our efforts to get Packwood and Hatfield to support the President from the Republican position.

In Pennsylvania, these individual local markets were largely dictated by congressional considerations and the fact that we had a very good shot, we thought, of making this vote one that Specter would have difficulty casting.

Rhode Island is completely a Democratic State, it is never in play in a Presidential race, and we did this exclusively to influence Chafee.

In Tennessee, we were trying hard to influence Thompson and to affect some of the congressional people.

Washington, I don't recall the targeting thinking there. And Wisconsin, again, I don't recall it specifically.

But the point is that these buys, these little picayune markets, each place which were aware of the advocacy issue ads ran in 1995 were largely dictated by my stra-

tegic view that I would frequently articulate at strategy meetings, and I remember I did so rather colorfully. I said, our goal is to split the Republican majority into small hunter-gatherer groups that we can pick off one at a time. And that phrase sort of stuck with them. And I was predicting the dismemberment of the Republican majority into hunter-gatherer groups with some optimism in September and October. Unfortunately, I underestimated the proclivity of the Republican Party for suicide.

Ms. COMSTOCK. Okay, I will make this document Deposition Exhibit Number 2.

[Morris Deposition Exhibit No. 2 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Could you describe what you know about how financially these media buys were paid for by the States and how that money was sent back to Squier, Knapp or Penn & Schoen?

Answer. I only know it secondhand. Bill Knapp was in charge of that, and he would receive money from the State parties, and that would fund the time buy.

The only reason I know that is that, after we had run this for a while, there were a number of State parties that were slower than others in paying, and I—he acquainted me—Knapp acquainted me with that, and I mentioned it to Sosnik, and he followed it up, and that was the last I had heard of it.

I don't know the mechanical process by which the money was given.

Question. I want to show you CGR 010924, a document the committee received from Mr. Ickes dated June 26th, 1996, a memo to Chairman Dodd, Chairman Fowler, B.J. Thornberry, and Brad Marshall, cc to Doug Sosnik, Karen Hancox, and Jennifer O'Connor, from Harold Ickes, and it is regarding bills for Squier, Knapp and Penn & Schoen.

Have you seen this document before?

Answer. No.

Question. Do you recognize any of the handwriting on the document?

Answer. No.

Question. You're not familiar with Mr. Ickes' handwriting generally?

Answer. No.

Question. Okay. This document reads, "Until further notice, I request that you hold payments on all bills of any kind, other than for time buys owed to Squier, Knapp and to Penn & Schoen until they have clarified a number of questions and provided adequate documentation regarding bills they have submitted."

Do you recall any discussions about that?

Answer. Yes.

Question. Could you describe those?

Answer. Yeah. This was during a period of fairly acrimonious negotiations and discussions between the consultant group and Ickes over the issue of the media commissions that we would be permitted to retain as compensation, and I suspected at the time that Ickes was deliberately using the facade that this document speaks of, that there was inadequate documentation as a method of slowing or stopping payments for polling and production costs to these two companies, Penn & Schoen and Squier, Knapp, Ochs, as a way of pressuring them to come to a quick agreement on his terms over the commissions that they would be permitted to retain.

I harbored these dark suspicions during this period and yesterday was shown a document which was a memorandum from Ickes to the President in which—at the Senate deposition, I was shown this document in which Ickes specifically said, "I am holding up further payments to Squier, Knapp, Ochs and Penn & Schoen for their polling and their production as a method of bringing pressure on them to get them to agree to a contract on our terms."

And that was very enlightening for me to see, because it was precisely what I thought was happening then, and it turns out that I was correct in that supposition.

Question. Can you generally tell us what the difference is between what you were asking for in terms of money and what Mr. Ickes was trying to bring it down to, generally, if you can give us ball park figures?

Answer. I don't recall, because they involved a minutia of discussions, but ultimately I think the average commission that the consultant group received on the entire flight of Clinton/Gore and DNC pre-convention media ended up being about 7 percent, and I think Ickes wanted it to be more like 5 or 6 percent.

Question. Initially, had you all asked for something like 15 percent?

Answer. In the first buy, which was the crime ads, the Clinton/Gore ads, we were paid 15 percent because we had been working for a considerable period of time without any compensation on the media for Squier, Knapp in particular. Then in the—then for a long time starting in August, it was pegged at 10 percent.

Question. August of '95?

Answer. Yes. And then I believe it was at 10 percent for the next 12 or 13 million dollars of media, and then after that, it dropped to 6 or 7 percent, and then it dropped further. The average was a little over 7 percent, as I understand, over the entire process.

Question. And was part of what Mr. Ickes was trying to do because of pressures from DNC fund-raising, to your knowledge?

Answer. I have no idea. I don't know. I felt that it was not a good-faith effort on his part. I felt that we were talking about a $45 million time buy that was ultimately spent, $30 million of it from DNC, and a 1 percent difference on half of the buy would amount to $1 million.

I didn't think that that was his motivation at all. I felt that his motivation was to try to raise a thorny issue to interrupt the smooth flow of my relationship with the President and to use the disagreements over money as a method of antagonizing the President, of making the President antagonistic toward me and toward the consultant group. He didn't succeed in that, but I felt that was why he was doing it.

Question. So you think the amount of difference was somewhere in the ball park of $1 million that he may have been——

Answer. Yes. Probably even less, because as time went on, the amount of money—for example, this memo was June 26th. We knew that we would stop any advertising other than—we knew that in the general election we would have a completely different commission arrangement. So this pressure would have been designed for a 2-month period, and in that 2-month period we probably sent about $6 million. So a 1 point difference over $6,000,000 is a $60,000 difference.

When I suspected that he was playing hard ball over $60,000, it was not because he genuinely wanted to save the $60,000, it was because he wanted to find an issue where he could try to impair my relationship with the President.

Question. Were you aware at this time, at or around late June, early July of 1996, Don Fowler putting a lot of pressure on both the fund-raisers at the DNC to raise a lot more money?

Answer. No.

Question. Do you have any—have you learned at all about any particular pressure that was put on John Huang to raise money in July of '96?

Answer. No.

Ms. COMSTOCK. I would like to make this document Deposition Exhibit Number 3.

[Morris Deposition Exhibit No. 3 was marked for identification.]

The WITNESS. By the way, it is 12:53. Maybe at 1 o'clock we could break for——

Ms. COMSTOCK. I know you do want to get out at 4:00, so if we could go until about 1:30, and then we can see where we are at.

The WITNESS. 1:00, if you would.

Ms. COMSTOCK. Okay.

The WITNESS. I have a phone call that I scheduled at 1 o'clock.

Ms. COMSTOCK. Okay.

EXAMINATION BY MS. COMSTOCK:

Question. I'm just showing you for reference purposes, because I'm talking about a document and these are Mr. Sandler's handwritten notes, I have no reason to believe you have seen these or you don't know anything about them, so we can say that at the outset.

But in here, this is DNC 3096675 through 81. It's talking about FEC reports and State committees and how the money is spent at the State level. We were just talking a little bit about how the States were doing media buys and then the bills were being—they would send the payments back to Penn & Schoen.

I was wondering if you ever recall hearing any discussion about that the FEC doesn't usually audit State committees in any way?

Answer. No, nothing.

Question. Directing your attention to the—I mean, there are some handwritten notes here.

Answer. Yes, I read that. As you can tell, I have been reading through the document, and I see nothing here that I'm familiar with.

Question. So in terms of any of your discussions with Mr. Sandler, these—I will let you look through the document here initially and maybe just ask you if you generally recall some of the topics that are referenced here, if any conversations you had with Mr. Sandler, if these topics may have come up.

Answer. No.

Question. So I will just allow you to—I think one of the issues is, the FEC doesn't audit State committees.

Another issue——

Mr. BALLEN. I want to state for the record, since the witness doesn't know anything about this document, hasn't seen it, I don't want any inferences drawn as to the meaning of the document or what Mr. Sandler intended or——

Ms. COMSTOCK. I think that is clear from the record. I am just using this as a point of reference to see if any of these topics may refresh his recollection as to any topics that Mr. Sandler may have raised with you.

The WITNESS. No, in answer to FEC audit, and nothing that I can see in the document.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall any—in regards to the State parties, do you recall there ever being any effort to have some type of State party coordinating body that would filter out everything and that there would be some counsel that would work with the State parties at any time?

Answer. No.

Question. Okay. Were you aware of Mr. Ickes having meetings with Mr. Sandler separately to discuss these State party issues and how they would get the money out to the State parties and back to Penn & Schoen and Squier, Knapp?

Answer. Squier, Knapp, but no.

Ms. COMSTOCK. Okay. I will go ahead and make that Deposition Exhibit Number 4.

[Morris Deposition Exhibit No. 4 was marked for identification.]

Ms. COMSTOCK. I guess we are at a breaking point.

The WITNESS. Okay. So 1:30?

Ms. COMSTOCK. Do you want to do 1:30?

The WITNESS. Good. Okay.

[Whereupon, at 1:00 p.m., the deposition was recessed, to reconvene at 1:30 p.m.]

EXAMINATION BY MS. COMSTOCK:

Question. We can get back on the record. I am going to pick up on something we were on before the break, before Mr. Cummings came in. We had been discussing a Washington Post article that had appeared, July 18, 1997, about Harold Ickes, and we had been discussing the comment you made about if Harold really unloaded, there would be a whole lot more going on now.

I think you pretty much completed going through that, but I was wondering if you had any particular knowledge about any information Mr. Ickes had about any investigation into the President or the First Lady?

Answer. None.

Mr. BALLEN. It has been asked and answered.

EXAMINATION BY MS. COMSTOCK:

Question. In the past you had been reported by, I believe it is Republican operatives or whatever, saying you thought the President might be indicted. Did you ever say that to anyone in public?

Answer. The allegation was I said that to Governor Weld. That is the allegation that appeared in print.

Governor Weld and I have both denied it on the record. Governor Weld's denial appeared in the Boston Herald a few days later. I do not recall making such a statement to anybody.

I think I did during the course of my work with Republicans in '93 and '91 and '93 and '94 indicate that I thought that Clinton would be perpetually grilled for scandal-type investigations because I knew all of the controversies that surrounded him and I was aware of those before the world at large was just simply because I was with him in Arkansas and I knew what was publicly reported then.

But this was never derived from any inside knowledge or inside information about any of these scandals. It was just that I read the press on Clinton a lot before anyone else did, because I was working for him for 20 years.

Question. Do you know anything—do you know a group called the Back to Business Committee?

Answer. I don't think so.

Question. And Louis and Lynn Cutler were affiliated with?

Answer. I have heard about that, yes.

Question. Do you know if Penn & Schoen or Squier Knapp ever did any work for the Back to Business Committee?

Answer. No, I don't. I would be surprised if they did because they never told me they did, but I don't.

Question. Did you ever do any work for the Back to Business Committee?

Answer. No.

Question. Do you have any knowledge about any of the polling that you did being shared with the Back to Business Committee at any time?

Answer. No. Could you clarify for me the time frame of when they operated?

Question. I believe it was somewhere around 1994 to—I am not quite sure when they disbanded.

Answer. Well, my polling really was only there in '95.

Question. They definitely were in existence in '95.

Answer. Were?

Question. Yes.

Answer. Yes, I have no knowledge of it being shared with them. The reason I say that is, and Lewis had access to all of our polling data after September or October of '95 when she joined the White House staff.

Question. She would have had access to the polling, but you have no knowledge of anything related to Back to Business?

Answer. No.

Question. Aside from the fact that Ms. Lewis is associated with Back to Business?

Answer. Yes.

Mr. BALLEN. For the record, it is clear the witness stated she had access to the polling after she joined the White House in September or October.

The WITNESS. Yes, but not before.

EXAMINATION BY MS. COMSTOCK:

Question. And did you conduct polls regarding Whitewater or Filegate or other matters that arose, investigations——

Answer. Yes.

Question [continuing]. During your polling? And do you recall who paid for those polls?

Mr. BALLEN. I am going to object. We are now into discussing the actual kinds of questions that were on the polls?

Ms. COMSTOCK. I am asking about who paid for the polling.

Mr. BALLEN. He already testified as to his knowledge of the payment of the polling.

The WITNESS. I can short-circuit the debate by saying as I mentioned each question was allocated to one or the other, and I have no knowledge of how those particular questions were allocated.

EXAMINATION BY MS. COMSTOCK:

Question. So you don't, for example, if a Filegate question, Craig Livingstone would be a DNC question or a President Clinton—Clinton/Gore question?

Answer. That is correct.

Question. I believe you have made statements, public and reported, regarding Harold Ickes and his temper. I believe you said he exercised a reign of terror at the White House. Is that an accurate portrayal?

Answer. It is accurate that I said it and it is an accurate portrayal.

Question. Could you just briefly describe why, the kind of things that led you to say something like that?

Answer. When I got to the Clinton operation in 1994 and early '95, and I began to interact with the staff, with the White House staff, everybody on the staff was terrified of venturing forth with any ideas that would be moderate or centrist in nature, because they were certain that they would be fired, in particular Don Baer, who was the first White House staffer that I dealt with concerned about it.

I remember being shocked about it, because the way I met Baer was that the President called Baer and had him up to the White House with me, and he said, I would like you two to meet each other, and he turned to Don and said, I would like you to work as closely as you possibly can to Dick and listen to what he says and work very closely with him. And I said great, and we left and went to Squier's office to work together on our first speech. And he said, "you mustn't tell any one that I am doing this." I said, what could you mean? He said, nobody should know that I am working with you. I said, the President just told you to work with me. And he said, no, no, if Ickes finds out, I am dead meat, I am out of here. No way—I said, you are following the President's directive, Don. And he said, yes, but tell that to Ickes.

That was repeated, that kind of thing was repeated a dozen times, that people were—that people were terrified of advancing any political idea, other than left wing Democratic Party liberal approved thinking. There was, as I said, a reign of terror going on, and many White House staffers who were closet moderates greeted my emergence with some power in the White House with a great sigh of relief, because they could finally come out of the closet and share their real opinions with people.

In fact, many of the moderates had resigned by the time I got there, Galston among them, in despair at their ability to have any influence in moderating the left wing drift of the White House.

Question. Were you ever concerned that given—and did Harold use his temper, I think you described previously the situation where the door had to be fixed and that kind of situation. Were you ever concerned that his behavior and the way he treated staff might cause people to do things that they—in response to him that maybe they shouldn't or would get the President in trouble because they were trying to respond to Harold, that they wouldn't be using judgment?

Mr. BALLEN. I am going to object to this entire line of questioning. We are now in an investigation that is supposed to be about campaign fund-raising. We are getting into Mr. Morris' insights, which are quite interesting, into an area that has absolutely nothing to do with the subject matter of this investigation, Mr. Ickes' temper, his temperament, how he conducted himself, whether a door was rattled or not.

Ms. COMSTOCK. I am asking about the climate created by the central person which this person has testified is in charge of the budget of the DNC, and I would like to discuss the climate he was creating.

Mr. BALLEN. That is not what he testified to. He didn't say he was in charge of the budget. There is no relationship of these kinds of questions to the subject matter of this investigation.

Mr. LENEFSKY. You can answer.

The WITNESS. I was rather hoping someone would be mad enough at him to shoot him, but other than that I didn't have any serious concern he would turn people off the President, no.

EXAMINATION BY MS. COMSTOCK:

Question. Were you concerned that actions taken by anybody would not be consistent with the law or doing things the right way, because if Harold told you to jump, you were going to jump, regardless. Did you ever have any concerns like that?

Answer. It makes sense now, but I sure didn't think of it then.

Question. You hail from New York as well as Mr. Ickes does. Are you familiar with his—do you have any personal knowledge about any legal problems in his background?

Mr. BALLEN. Objection.

The WITNESS. No.

Mr. BALLEN. Objection. Relevancy. Mr. Ickes' personal legal problems are not a subject matter of this investigation.

The WITNESS. Off the record.

[Discussion off the record.]

EXAMINATION BY MS. COMSTOCK:

Question. Have you talked recently with the President about Harold Ickes and these documents that were turned over to Congress?

Answer. I don't understand the question.

Question. Have you talked with the President about Harold Ickes' documents that were turned over to the Congress?

Answer. No.

Question. Have you talked with the President about Harold Ickes since January 20th of this year?

Mr. BALLEN. Objection, relevancy.

Mr. LENEFSKY. I have no problems with that.

The WITNESS. No.

EXAMINATION BY MS. COMSTOCK:

Question. How often do you currently speak with the President?

Mr. LENEFSKY. How often——

EXAMINATION BY MS. COMSTOCK:

Question. Do you currently talk to the President?

Mr. LENEFSKY. You can answer, if you recall.

The WITNESS. I would rather not answer it.
Mr. BALLEN. I object as to the relevancy.
The WITNESS. I would rather not answer that question.
Mr. LENEFSKY. You don't have to explain.
Ms. COMSTOCK. Are you instructing your client not to answer?
Mr. LENEFSKY. Yes.
The WITNESS. If you want to ask me about specific topics that I may or may not have spoken to the President about, feel free to do that, and I will answer, but I don't want to answer an open-ended question of how often we speak or an open-ended question about what we talk about.

EXAMINATION BY MS. COMSTOCK:

Question. I understand that.
The second one, I am not going to be going into it, the whole array of what you may talk about. I would like to just get a general idea how often——
Answer. I would rather not answer that question.
Mr. LENEFSKY. I object.

EXAMINATION BY MS. COMSTOCK:

Question. Have you talked with the President about anything relating to the general matters that are under investigation by this or the Senate committee?
Mr. LENEFSKY. By this committee?
Ms. COMSTOCK. This, the Justice Department, the Senate. The general fund-raising matters, the matters re the John Huang, John Trie, Harold Ickes' documents.
The WITNESS. Yes, I have.

EXAMINATION BY MS. COMSTOCK:

Question. Can you describe what those conversations were and when they occurred?
Mr. LENEFSKY. Do you want to talk outside?
The WITNESS. Yes.
[Discussion off the record, 1:50 p.m. to 1:53 p.m.]
Mr. BALLEN. Before you answer or not answer, let me just raise something. White House, for your consideration, White House counsel has requested to be at depositions of White House employees or people who have worked for the White House in order to be able to assert any claims of executive privilege——
Ms. COMSTOCK. I don't believe Mr. Morris testified he ever worked at the White House.
Mr. MCLAUGHLIN. The opinion of the D.C. Circuit judge extends the privilege to lawyers——
Ms. COMSTOCK. To campaign consultants?
Mr. MCLAUGHLIN [continuing]. To people working for the President giving advice.
Mr. LENEFSKY. I have reviewed Mr. Morris' response to the question. I have no objections whatsoever to Mr. Morris responding. I don't think the President would have any objections. I don't think the Senate Majority would have any objections. I don't think they are objectionable anyhow.
The WITNESS. So I choose to respond. I have had—I cannot recall when, but these conversations took place subsequent to the 1996 election. In one conversation I advised the President that I felt the way to defeat the partisan attempt of the Republican investigating committees is to outflank the Republicans by stronger advocacy of campaign finance reform.
I remember telling the President that the Republicans don't really want campaign finance reform, they just want to narrow the focus to scandal, and if possible only the Democratic scandals, and that the public doesn't particularly care about the scandal, they care about finance reform. And by playing what I called jujitsu, which is harnessing the enemy's strength against him, he can take the impetus of your investigations and turn it against the Republican Party by taking advantage of the elevation of the germaneness of the issue of campaign funding reform and becoming a better advocate of it than the Republicans are. I went through that. That is essentially what I said to him.
The second——

EXAMINATION BY MS. COMSTOCK:

Question. Somewhat like what appeared on the front page of the Washington Post this morning?
Mr. LENEFSKY. That is the article I told you about.

The WITNESS. I didn't see it. I had nothing to do with that story.

And then the second time that we discussed it——

EXAMINATION BY MS. COMSTOCK:

Question. What was the President's response?

Answer. He just listened. Generally when I speak to the President and give him advice, sometimes he will question it or he will comment about it, but most of the time he will just listen and he will just say okay, what else.

And then the second thing was that at least one and perhaps two or three junctures since the election I have told the President that it is my opinion that he should continue to oppose the appointment of a special prosecutor; that sooner or later the Justice Department will actually begin to produce indictments, and once they do, everybody will accept their investigation as being intensive, intrusive, and legitimate.

I also said that I felt that in opposing the campaign—the appointment of a special prosecutor, he should stress Senator Helms' involvement in that process through the judge, whatever his name is, and that in focusing on—the way I urged him to frame the issue was, who do you want to name the prosecutor, Janet Reno or Jesse Helms, and we would come out ahead in that comparison. And I said I felt that the special prosecutor's position had so diminished in public prestige that he should not feel under compulsion to urge that appointment.

He then replied to me that he felt that he agreed with me, that he felt that there was "nothing there," and that the investigation—that sooner or later people would get that the investigation was a very aggressive one.

I then cracked a joke to him where I said, Mr. President, there were times during the first term when I had the impression you would have welcomed a special prosecutor assuming some of the jurisdiction that Ms. Reno assumed. You would have probably gotten a better break from them.

And he didn't laugh.

Question. I believe you had been quoted as making some comments about why Janet Reno didn't appoint a special prosecutor and about meetings she had with the President.

Mr. LENEFSKY. Do you remember any quote?

The WITNESS. Yes. I was quoted in the National Review on it.

Yes, I can't recall what I said or didn't say at that juncture, but let me answer your question. I believe that subsequent to Election Day, the President had a meeting with Janet Reno, which was unusual because they had been on very icy terms during the last 2 years of his first term, and to my knowledge there was a time when they were really basically not speaking to each other. I mean, they just didn't talk. It was done through intermediaries.

They had a meeting and it was my impression that—actually the President told me that the air—that that had cleared the air and he felt much better about Reno, and that he felt that she—that he wanted her to stay. I said that I felt that their relationship had improved since Election Day.

I specifically at the same time said I did not feel—that I had no information and I would doubt very much that any specific issue about a special prosecutor was discussed between the two of them. I don't think the President would discuss that, and I don't think Reno would permit him to discuss that. But I do think the relationship warmed considerably, and I was surprised at that.

I think that what happened was during the period when Reno was being considered, was looking at reappointment, I think that she—I think that she began to reflect on the President's merits and he began to reflect on her merits, and I think there was a more of a bond developed.

That is what I said and what I know.

EXAMINATION BY MS. COMSTOCK:

Question. You said they previously had spoken through intermediaries. Did you have any knowledge as to who those intermediaries were?

Answer. Yes, only insofar as we are talking about crime issues, public policy issues. And in that interface, it was usually through Rahm Emanuel——

Question. But in terms of these investigations, you don't know of any intermediaries speaking with the President on Ms. Reno's behalf?

Answer. No. Correct. You have to understand that I kept as far away, not just from fund-raising, but from the whole issue of Whitewater and scandals, as I possibly could in the White House. I used to tell people my job is to man the pump and engines, not to repair the hole in the bottom of the boat.

Question. Earlier you appeared on Fox News where you had discussed polling. You said your polling shows that this fund-raising scandal doesn't make any difference about how people feel about the President.

Are you conducting polling for the President or for the DNC on any of these matters?

Answer. No.

Question. What type of polling was that that you were referring to?

Answer. Since I left the White House, I have made it a practice on six or seven occasions to do polling at my own expense on my own to get data which I then use in my public comments on radio, TV, and in print. Shortly after the, in fact, the day after the Woodward story broke in the Post about first suggesting that there was an organized effort by the Chinese government to influence American politics and to funnel money to politicians, including the President, I polled that and I asked people if it made a difference to them, if it made them more or less likely to support Clinton and all of my usual way of examining that. And I found that the majority said it made no difference and that the people that said it made them less likely to vote for or support Clinton, were people that were against him before they were asked that question.

So on that basis, I was on the McLaughlin TV program that weekend, and I quoted that information, and indeed gave it out over the air. I sent a copy of that information to the President, and I have sent copies of all my polls to the President, but he has neither authorized the polling nor reviewed the questions nor asked me to poll nor paid for it. I just pay for it out of my own pocket.

Question. And have you discussed these with the President at all?

Mr. BALLEN. I object. I think this is really very far afield, what his discussions now are with the President about polling, about——

Ms. COMSTOCK. The issues that are raised in terms of fund-raising matters.

The WITNESS. I think I may have called his attention to that particular piece of data verbally.

EXAMINATION BY MS. COMSTOCK:

Question. I think in this same Fox News Sunday show, March 2nd, 1997, you were discussing Vice President Gore's phone calls. I believe you indicated that you did know that the Vice President was making phone calls.

Do you recall when you became aware that the Vice President was making phone calls for the DNC?

Answer. Well——

Question. For fund-raising?

Answer. In the show I indicated that I knew that the Vice President was making phone calls, but that I did not know from where he was making the calls, because the issue at that time was not that he was making the calls, but that he was making them from his office. I said I don't know where he made them from.

The way I came into knowledge about it was that at some point, and I can't be very precise about the time, I was talking to either Bob Squier or Ron Klain or Jack Quinn, I can't recall who I was talking to, but those would be the people who would have been one of that cast of characters, and one of them mentioned to me that the Vice President was working very hard at raising money, making all of these phone calls, and he felt the President really wasn't working as hard as he needed to work and wasn't making phone calls. And he indicated the Vice President had a certain amount of resentment, that he was doing his job and the President was not aggressively working on raising money, on making phone calls. And I replied that the President never—that as Governor, Bill Clinton hated making fund-raising calls, and it was pulling teeth to get him to do it, and that was a casual conversation and that is what I related on Fox News.

Question. I am showing the witness DNC 3234267, a document, a memo of November 20, 1995, to Harold Ickes from Don Fowler, Marvin Rosen, Scott Pastrick, and Richard Sullivan, regarding additional DNC fund-raising requests. It references 18 to 20 phone calls by the President were needed and 10 calls by the Vice President. This was a proposal apparently submitted by Mr. Fowler, et al.

Answer. I have read the document.

Question. Had you seen this document?

Answer. No.

Question. Were you aware of efforts, from the conversation you had with Mr. Klain, was it, did you——

Mr. BALLEN. He said he wasn't sure who it was with.

The WITNESS. It was one of three or four people.

EXAMINATION BY MS. COMSTOCK:

Question. From this conversation, was it your understanding that the President had been asked and had agreed to do some fund-raising calls? Or hadn't? But hadn't been living up to that agreement?

Answer. I don't know whether he had agreed to make them and had not made them, or if he simply had not made them. The purport of the comment that was made by Klain or whoever was that he was not making the calls, whether it was things he agreed to do or not, I don't know. This is the first I have heard of this—first I have seen of this memo or the first I have known of any of the substance it contains.

Question. You were not aware of any calls or anything like that that were ever provided to the President?

Answer. That is correct.

Question. In your book you discuss conversations you had with the President about how much fund-raising he had to do and how unpleasant this was for him. Aside from those conversations that you recounted in your book, did the President ever discuss with you in general what he was doing to raise money?

Answer. Yes. He was constantly complaining about the amount of his time that had to be spent on fund-raising and the physical strain that it took on him, but I always had the impression that those complaints related to his physical appearance at fund-raisers. It was a grueling task. The fund-raisers, I went to six or seven fund-raisers, always as a donor paying my own way, and I used to use it as an opportunity to introduce family members of mine to the President and kind of, you know, make up for some of the absences that I was going through. And I would always make a point of going after the paying customers, the ones who were really major donors who had shaken his hand.

What would happen, there would be an event, he would come in, and then the guy would stand there for 3 or 4 hours, standing, posing for pictures and shaking hands with each person as they walked through.

And I would—at one event—I live in Stanford, Connecticut—I decided I would stand just as long as he was standing so I could have some appreciation of what he was going through. And I wanted to lean against the wall. I wanted to sit down. I was going crazy. And when I came up to him, I said, your feet must be killing you. And he said, I hate it. I just hate it. I have to stand here.

And a lot of times he would complain. He would say, I haven't slept in 3 days; every time I turn around they want me to be at a fund-raiser. At one point I quote in the book he said, you want me to issue these executive orders, I cannot think, I cannot act, I can't do anything; every minute of my time is spent at these fund-raisers.

But I didn't have the impression, do not have the impression, he was complaining about phone calls. He was complaining about the number of fund-raising events and the physical wear it took on him.

Ms. COMSTOCK. I am going to go ahead and make this document Deposition Exhibit Number 5.

[Morris Deposition Exhibit No. 5 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Were you aware of events at the White House, the White House coffees that have been generally referred to now?

Answer. Not at the time. Only subsequently in reading about them.

Question. You have no knowledge other than the public accounting that has come out in the past few months?

Answer. That is right. The only connection I had with those kinds of private raisers, the seven or eight fund-raisers I attended were all large ticket public events, $1,000 a head events with hundreds and thousands of people in the room. In fact, one of the reasons I went, in addition to the opportunity to introduce members of my family to him, was that I would, after I became well-known, I would walk up and down the receiving line and just thank everybody for their help and shake hands and stuff.

The only times that I was ever involved in small—that I have any knowledge at all of these small fund-raisers, was two or three occasions I would stop by a fund-raiser he was having at a hotel and just pass a note in to him through the Secret Service, because he wouldn't get home until late at night and I didn't want to have him call me at 1 o'clock in the morning so I passed him the note that evening so I wouldn't have to bother him.

Question. Were these fund-raisers at the Jefferson Hotel?

Answer. One or two at the Jefferson, one or two at the Hay-Adams. I was never in the room. I passed it through the Secret Service.

Question. Do you have any idea who these small fund-raisers were with?

Answer. No.

Question. Did you ever attend the President's birthday party fund-raising events?

Answer. Yes, I attended his 50th birthday party fund-raiser.

Question. Would that have been last year, in '96?

Answer. Yes.

Question. Were you aware of Johnny Chung being a sponsor of that event?

Answer. No.

Question. Have you ever met Johnny Chung?

Answer. No.

Question. Do you know anything about Johnny Chung's fund-raising?

Answer. No.

Question. Or frequent visits to the White House?

Answer. Nothing.

Question. Did you have much contact with the First Lady's office when you were——

Answer. Yes.

Question [continuing]. Working for the Clinton/Gore campaign?

Answer. Yes.

Question. And what kind of contact was that?

Answer. I met with the First Lady subsequent to June of 1995. I met with the First Lady about every 2 or 3 weeks to give her political briefings. Maggie Williams was occasionally there, Melanne Verveer was more often there, and usually Mark Penn was there with me. Since she didn't attend the strategy meetings, I would summarize what we were thinking and what we were planning for the campaign.

I also would give her personal recommendations as to things that I thought she should do, issues I thought she should talk out about, and advice on public policy positions that she should take. I worked extensively with her staff to work on getting her speeches down and her rhetoric down on public policy.

I never participated in any advice sessions concerning her handling of any of the scandal issues, her testimony or anything like that.

Question. Did you ever hear from anyone, were you aware of her participation in fund-raising events at the White House, lunches or coffees or anything like that?

Answer. No.

Question. Did you ever hear from any of her staff about whether it was Johnny Chung, or if he didn't have a name identified with it, somebody who was making—coming by frequently——

Answer. No.

Question [continuing]. And making a nuisance of himself in any way?

Answer. No. The only indication I had that she was doing fund-raising actually was the passage I quote in the book, the President after he said he couldn't think and spend time, he said, Hillary can't, Al can't, none of us can. And I was surprised when he said it, because it hadn't occurred to me she was spending a lot of time on fund-raising.

Question. I wanted to show the witness another document dated December 20, 1995, DNC 3234272, a memo to Harold Ickes and Karen Hancox from Marvin Rosen and Richard Sullivan regarding DNC finance update. Again, this goes through some of the money that needs to be raised by the end of the year, apparently.

I guess directing your attention to Terry McAuliffe and it discusses received from labor on Thursday re Terry McAuliffe.

Were you aware of Terry McAuliffe doing any fund-raising from the labor groups for the $10 million media fund you were trying to get raised in the fall of 1995?

Answer. Not particularly from labor. I was of the opinion that McAuliffe was the President's best fund-raiser, and I thought it was silly that he was spending his time raising money for Clinton/Gore when we wouldn't be spending Clinton/Gore money until later in the process; that in 1995 the major need was for money at the DNC in order to pay for the media and the other expenses that were being incurred then.

I remember mentioning to the President that it would be good—I thought it was silly for McAuliffe to be concentrating his energies on Clinton/Gore when he should be concentrating them on the DNC. And I had that conversation with the President sometime around October. That is the only knowledge I have had of McAuliffe being involved and not with the DNC.

Question. And what did the President say?

Answer. He didn't comment. He just heard it.

Question. Directing your attention to the Vice President calls, it indicates received to date at this time were $195,000 from the calls and commitments from the Vice President; calls that had not yet been collected at that time were approximately $65,000.

Do you recall ever hearing about a figure that the Vice President raised in terms of money?

Answer. No.

Mr. BALLEN. I want to point out for the record the witness testified numerous times he wasn't involved with fund-raising and didn't know about fund-raising. In the interest of his schedule and everyone's schedule——

Ms. COMSTOCK. I will make this Deposition Exhibit Number 6.

[Morris Deposition Exhibit No. 6 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Were you aware of the Lincoln bedroom being used as a fund-raising opportunity——

Answer. Not until I read about it.

Question. You have made comments regarding that.

I show the witness a February 27th, 1997, NBC news report by Jim Miklaszewski, M-I-K-L-A-S-Z-E-W-S-K-I. Directing your attention to the second page, you are quoted as saying, "I am surprised he didn't auction off places in his own bedroom. He would probably sleep on the floor if someone would give him a million."

Answer. That was a joke.

Question. Did you ever talk to the President about those comments or anything about them?

Answer. No.

Question. Did you ever spend the night at the Lincoln bedroom?

Answer. No.

Question. Or any of the bedrooms in the residence?

Answer. No. I was having problems enough in my nights at the Jefferson.

Question. You have no knowledge—do you have any knowledge of donors or people, large dollar donors who being at the White House, regardless of whether you knew they were any kind of entrance fee or payment?

Answer. None, none, none.

Ms. COMSTOCK. I will make that Deposition Exhibit Number 7.

[Morris Deposition Exhibit No. 7 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Can you describe George Stephanopoulos' role in the work you did while you were working with the Clinton/Gore campaign and the DNC?

Answer. There were essentially four operations with which I was involved that were relatively discrete operations that were part of the message, getting the President's message across, which was my mandate.

One was paid media, which Bill Knapp was the sort of COO of, chief operating officer. The other was the President's speeches, which Don Baer was in charge of. The third was rapid response, which Stephanopoulos was in charge of. And then the fourth, which was outside of any jurisdiction of mine and I never was involved in, was Whitewater response, which Ickes and a variety of other people were in charge of.

So Stephanopoulos was essentially the person who was in charge of rapid response. The President had given him that task. And what that meant was that when the Republicans did anything, he would orchestrate the rebuttal, the reply, the answer, to feeding their attacks on a day-by-day basis.

In addition to that, Stephanopoulos was in charge of coordinating the activities of the government so that they went toward the substantive agenda the President had in mind. So he was the one that would sort of send the President's line out and make sure that everybody was echoing it, that everybody was on the same page. And when somebody was off the page or said something that the President would not have wanted them to say, they would get a call from George and he would urge them to take a different approach in public.

Question. Do you know——

Answer. He also was the fact checker on our ads and he also worked very closely on all aspects of the positioning that the President took on substantive issues.

Question. Do you know anything about his roles that would have him in contact with somebody like John Chung for any reason?

Answer. I have no idea.

Question. Do you know anything he was working on matters related to China?

Answer. No.

Question. Did there come a time when Mr. Stephanopoulos told you about the discovery of life on Mars?

Answer. Yes.

Question. You are recounted that incident in your book?

Answer. Yes.

Question. Did he ever mention anything to you about this being classified information or that it couldn't be shared with anybody?

Answer. No. He told me that he wanted it to be kept secret so that it would not be released to the public until the start of the Republican Convention, and his thought had been that the story would break on Monday of the Republican Convention and would drown out coverage of the convention. But he cast that in a political context, not in a national security context.

Question. So he never told you that any of that information was classified?

Answer. No. He also was aware that I had no security clearance nor had I sought it, even the lowest level, and I would doubt—and I doubted that he would ever share with me classified information, because it would be illegal, so I inferred that this was not classified.

Question. After this became public that he had discussed this with you, did anyone ever raise this issue with you from the White House?

Mr. LENEFSKY. What is the relevance of this?

Ms. COMSTOCK. National security issues.

Mr. LENEFSKY. Is that within the purview?

Ms. COMSTOCK. It actually is. National security.

Mr. BALLEN. I join in counsel's objection.

The WITNESS. The generic answer is I never had access to national security information that I knew was national security. The President never shared classified information with me, and I never, as I sit here now, I do not know that I ever was in possession of national security information.

EXAMINATION BY MS. COMSTOCK:

Question. But it was clear to everybody at the White House that you had not had a clearance, you had not ever gone through anything.

Answer. Correct.

Question. There was no reason for anyone to think you had a clearance?

Answer. That is correct.

Mr. BALLEN. I may want to note on the record that life on Mars has nothing to do with national security.

The WITNESS. It depends on what it is.

Mr. BALLEN. One cell life.

EXAMINATION BY MS. COMSTOCK:

Question. Do you recall raising issues about Mr. Penn's work for foreign—on foreign elections?

Answer. Yes.

Question. Can you describe what issues you raised and why you had concerns about that?

Answer. It arose in two contexts. One was that I was requested to make a public disclosure of my income sources and my assets and clients, and that request, to my knowledge, was also addressed to the other consultants who worked with me. I had an extensive discussion with Mr. Penn about his compliance with that directive, and he indicated to me that he was working for a candidate in Turkey and that the terms of his arrangement were such that the relationship had to be secret while the election was going on and that the election was being held in the third week of December of 1995, and that therefore he would rather that he not make his disclosure until after that date, where he would disclose the Turkish relationship, but it was subsequent to the Turkish election and therefore would not be embarrassing to his candidate in Turkey. I told him I thought that was okay.

Secondly——

Question. Who was that candidate?

Answer. The woman in Turkey. I forgot her name.

Then secondly, in September or October of '95, he took a walk-in closet in Doug Sosnik's office, which was a political office, and converted it into an office space for him, and he told me that he had brought in the campaign computer and the campaign-dedicated phone line and had had it installed in that walk-in closet and made it a little office for himself.

I was concerned about his having an office in the White House for a variety of reasons. I felt it was a bad idea. I told the President that I thought it was a bad idea because he had conflicts of interest in terms of his commercial clientele and his foreign clients, and I particularly cited his work for ATT and his work in the Turkish elections.

Since the political office was right next to the communications office and those issues were being reviewed in the communications office, I thought that it was inappropriate for him to have an office in the White House.

The reason I raised it with the President was I knew Penn would not like my telling him he had to close his office, and I wanted to be certain I had the support of the President in doing that. The President told me that he supported me. I asked Penn to remove himself from the office and he did.

Question. Did Mr. Penn have a White House pass at that time?

Answer. Not to my knowledge.

Ms. COMSTOCK. If I could take a brief 5 minutes here and see if we are close to wrapping up.

[Brief Recess.]

EXAMINATION BY MS. COMSTOCK:

Question. You know Susan Thomases, is that correct?

Answer. Yes.

Question. And how long have you known Ms. Thomases?

Answer. Since the early '80s.

Question. And do you have any knowledge about any work that Susan Thomases did for the Lippo Group or the Riadys?

Answer. No.

Question. And do you know Webster Hubbell?

Answer. Yes.

Question. How long have you known Mr. Hubbell?

Answer. I just met him once, and have never spoken with him, other than at a White House reception a few weeks after he resigned.

Question. Did you ever talk to anybody at the White House about Mr. Hubbell's legal problems?

Answer. No.

Question. Did you ever——

Answer. Yes, I did. I met with the President sometime in—this is before I worked there regularly, but I met with the President at some point before Hubbell resigned, I met with the President and the First Lady, and I urged them to fire Hubbell, Kennedy, Altman——

Mr. BALLEN. Excuse me?

The WITNESS. Altman. This was after Nussbaum had left. I urged him to fire Kennedy, Altman, and Hubbell, and I said rather than doing this piece by piece, get rid of them all so that you don't—so that you can stay ahead of the investigation. Don't do what Nixon did and wait until they come to your door with each individual one, because you will suffer 20 times more.

He rather heatedly replied that he wasn't going to ruin people's reputations by getting rid of them when they had done nothing wrong, and this was a witch hunt, and why did I think that he was prepared to injure people and wound them and destroy their reputations to save his skin from some bad publicity, when there was nothing there and they had done nothing wrong.

Question. Did you have any other discussions about Mr. Hubbell at any later date after he had pled guilty?

Answer. No.

Question. Were you aware of anyone at the White House assisting Mr. Hubbell with finding work after he left the Justice Department?

Answer. No.

Question. Regarding the——

Answer. When I say "no" to any of these, it means other than what I have read in the paper.

Question. I understand that, and I hope that is clear for the record. I am after your personal knowledge, or if you have other knowledge, to tell us it is only from newspaper accounts.

Regarding the issue of whether or not Webb Hubbell was paid sort of what was generically referred to as hush money, you made the statement in reference to the President saying he is too much into denial on one hand and too much of an ingrate on the other.

What did you mean by that?

Answer. That the President, that I doubted seriously that the President was involved in any payment of hush money to Hubbell; that it is not his style. On the one hand, he never believes that he has done anything wrong, and he is constantly of the opinion that he has always acted properly. Because that is always his opinion and everybody doesn't always act properly, I have to believe there is a certain amount of denial involved.

Secondly, I have always felt that he is a bit of an ingrate, that when people work hard for him and help him and they finish their usefulness to them, he basically does not feel personally obligated, he feels that they are helping the country and they are doing their civic duty, and other than a sort of polite thank you, there is no great sense of personal obligation.

So I summarized it pithily in that statement. I felt that hush money requires a certain guilty conscience that the President never has.

Question. Are you aware—there have been reports, and the committee has received documentation indicating that Mr. Hubbell was receiving quite a large amount of money in 1994 from various sources. Did you have any knowledge of this in 1994 or '95?

Answer. No, none.

Question. Do you know of any other—you spoke of the President often didn't treat people well after they had left. Do you know of any other people who kind of got this kind of treatment, from all the President's friends getting jobs and things like that?

Answer. Yes—oh, that was given good treatment or bad treatment?

Question. Good treatment.

Answer. No.

Question. In terms of being hired——

Mr. BALLEN. Excuse me, I am going to object to that question. You are assuming a fact not in evidence. Mr. Hubbell got good treatment by the President? We don't know that and the witness doesn't know that.

The WITNESS. In any case, I don't know.

EXAMINATION BY MS. COMSTOCK:

Question. Have any of the President's friends, when you left in August, did they come and offer you consulting contracts?

Answer. No.

Question. Or offer to give you——

Answer. No.

Question [continuing]. Jobs?

Answer. No. I might just indicate I know several examples of people who were very intimately involved with all of the President's affairs who, when they left their employ, couldn't get the right time of day from him. And quite the opposite of hush money, I felt that there was a tremendous amount of ingratitude in the way he dealt with them.

Betsy Wright, David Watkins, David Gergen, are all good examples of that. And I was, frankly, shocked at the callousness with which the President treated Betsy Wright and David Watkins after I personally witnessed 15 years of the most loyal kind of help of him by them.

Betsy Wright probably knew everything that the President did during the period he was Governor. If there was anything he was trying to hide or use hush money to hide, she would be a pretty good candidate for recipient of hush money.

Not only wasn't she getting hush money, she couldn't talk to him. He was never returning her calls, he wouldn't see her, she wasn't invited to the White House social events.

Question. Do you think Mr. Hubbell was being treated like Betsy Wright or David Watkins?

Answer. I never knew Hubbell. I know Betsy Wright and David Watkins were considered good friends.

Question. Have you ever talked to the President about how he treated David Watkins or Betsy Wright?

Answer. Betsy Wright, frequently. I would always say she treated you incredibly, and you will not give her the right time of day. He would say, I will call her, and he never would. It caused Betsy a great deal of personal agony.

Question. In your book, revisiting a little bit the ad campaign, you wrote on page 144 that "the President became the day-to-day operational director of our TV ad campaign. He worked over every script, watched each ad, ordered changes in every visual presentation, and decided which ads would run and where."

Do you recall discussing with the President the particular markets where ads would run?

Answer. Yes. I outlined earlier the process of his control over content in the media and the fact that he had tremendous input, but ultimately never saw the final ads before they ran, even though they changed significantly.

In terms of the time-buy, he was always shown the time-buy, he reviewed it, and he would occasionally ask for specific changes, some of which I thought made no sense, but he wanted to do them and we went and did them.

But as I said, while his inputs on this matter as well as the content of the ads was significant, he was really the first among equals in terms of the approval process.

In terms of the actual formulation of the advertisement, he had a much smaller role than any of the consultants did, and in terms of the allocation of where the money was spent, he had a much smaller role than Mark Penn or Doug Sosnik, who really were more effectively in charge of that.

Question. I am showing the witness a document from the DNC, 309623 through 38, which is Squier Knapp DNC media buys. As you review that document, you mentioned the President reviewed these often. Are these backward checks on these, are those checks that you recognize as the President's check mark?

Answer. It is clearly by a lefty. The President's check marks usually have a sharp downward check and then a check like that. These seem to be just like that. The President's check marks are usually down, "boom." I don't think translates well. They are usually down and diagonally up to the upper left. So I would not conclude from this that these are necessarily his check marks.

Question. Do you know somebody else reviewing the media buys who is a lefty that made the kind of checks?

Mr. BALLEN. I object.

The WITNESS. I don't know if anyone else is left-handed, no.

EXAMINATION BY MS. COMSTOCK:

Question. These are not your checks?

Answer. No. But I have testified that it was routine for the President to review the time-buys.

Ms. COMSTOCK. I would like to make that Deposition Exhibit Number 8.

[Morris Deposition Exhibit No. 8 was marked for identification.]

EXAMINATION BY MS. COMSTOCK:

Question. Do you have any knowledge of how the President's legal defense fund was being handled? Did you ever have any discussions with anybody about that?

Answer. None whatsoever.

Question. I believe there have been news reports that some of the phone records from your hotel showed you calling Bob Bennett.

Mr. LENEFSKY. What was the name?

Ms. COMSTOCK. Bob Bennett, the President's attorney.

EXAMINATION BY MS. COMSTOCK:

Question. Did you ever talk with him about legal defense fund or any matters related to the President's defense?

Answer. Not the legal defense fund. I did speak to him about the Paula Jones case.

Mr. BALLEN. I object to any questions in that regard on relevancy grounds.

EXAMINATION BY MS. COMSTOCK:

Question. Did you talk with him about—is that the only matter you talked with Mr. Bennett about?

Answer. I think it would be better if you asked me what I did talk with Mr. Bennett about. Again, not an open-ended question.

Question. If you can just tell us——

Answer. I did not speak to Mr. Bennett about anything related to fund-raising, the fund-raising investigation, fund expenditures.

Question. Actually I am more interested in the President's legal defense fund.

Answer. No.

Question. And what did you speak with Mr. Bennett about, then?

Mr. LENEFSKY. I am going to object.

The WITNESS. I did not.

EXAMINATION BY MS. COMSTOCK:

Question. You did not. Aside from the Paula Jones matter, were there other matters you discussed with Mr. Bennett?

Answer. Yes.

Mr. LENEFSKY. Mr. Morris said he would answer questions perhaps if you identify a subject matter of discussion between he and Mr. Bennett.

Mr. BALLEN. Excuse me——

EXAMINATION BY MS. COMSTOCK:

Question. Aside from the Paula Jones matter and any allegations regarding the President and First Lady, did you ever talk with Mr. Bennett about that?

Mr. BALLEN. Excuse me. The witness was in the middle of the sentence when counsel asked a question.

Mr. LENEFSKY. Let me go outside.

Mr. BALLEN. Let me finish for the record. He began to state that he did not discuss with Mr. Bennett any of the fund-raising, of campaign fund-raising or fund expenditures. I believe he was in the middle of completing the thought of the subject matters of these investigations.

The WITNESS. I would rather answer—I would rather if you asked me did you talk to Mr. Bennett about this particular Filegate or Whitewater or any of the specific things, I would be prepared to give you yes or no answers to that. But I would rather not answer the open-ended question of what did I talk to Mr. Bennett about.

EXAMINATION BY MS. COMSTOCK:

Question. Okay. Because Mr. Bennett is the President's attorney, I on the Paula Jones matter, I am not asking you about the Paula Jones thing, so I will just make that clear. But did you have frequent contact with Mr. Bennett?

Answer. I met with him on two or three occasions, and I spoke with him on eight or nine occasions.

Question. Did you speak with him on matters related to Whitewater?

Mr. BALLEN. Objection. Relevancy.

Mr. LENEFSKY. I would like to discuss something with my client outside.

Ms. COMSTOCK. Just for the record, the committee scope does include investigations of the President and First Lady.

[Brief Recess.]

The WITNESS. What was your last question? I believe your last question was did I ever speak to Mr. Bennett about Whitewater.

EXAMINATION BY MS. COMSTOCK:

Question. Yes.

Answer. The answer to that question is yes.

Question. Okay. Can you just generally tell us what you were talking with——

Mr. BALLEN. Before he answers, I am going to object to relevancy. I do not believe Whitewater is a subject matter of this investigation in any way, shape, or form, and I am going to renew my objection as to relevance.

Mr. LENEFSKY. Just a minute.

[Discussion off the record.]

Mr. LENEFSKY. Mr. Morris will answer the question.

The WITNESS. The question was what—the content of the conversation. I asked Ben if he thought that the President or Hillary were in any trouble over Whitewater that I need to take account of in my political consulting work, and he analyzed the situation for me and was largely positive and reassuring on the subject and said that he did not feel that they were in any kind of serious trouble.

EXAMINATION BY MS. COMSTOCK:

Question. Did you speak with David Kendall about this, also?

Answer. No, I have never spoken with David Kendall. I don't think I have ever spoken with David Kendall. I don't recall.

Question. Was this a number of occasions then you spoke with Mr. Bennett about those matters? You indicated there were a number of conversations.

Answer. Yes. I would routinely be in touch with him whenever there was a major new development to get his take as to whether there was something I needed to worry about politically, and he was always, and so far it has turned out accurate, reassuring on this subject and positive or optimistic about whether the President or First Lady were in any serious difficulty.

Question. Was that something you incorporated into your polling, was that just information?

Answer. Well, if he told me he felt there was a serious chance of something legally adverse happening to the First Lady or to the President before the 1996 election, it would have been important for me to develop contingency plans as to what to do. His assurance that was unlikely satisfied me and I did not spend much time developing contingency plans.

Question. Do you recall generally when these calls occurred?

Mr. BALLEN. Excuse me. I object to this line of questioning, asking the witness about political strategies.

The WITNESS. Think I have answered. They occurred while I worked form Clinton, '95 and '96, but I don't know the dates. I mean—yes.

Mr. LENEFSKY. There is no question before you.

EXAMINATION BY MS. COMSTOCK:

Question. Do you know a gentleman named Jack Palladino?

Answer. No. I think he is some way involved with the DNC, but I don't know who or what.

Question. Do you know of any private investigators that were ever hired to investigate any Members of Congress or anybody who was investigating the President or First Lady?

Answer. Do I know of any private investigators that were ever hired to do what?

Question. Who were ever hired by anyone affiliated with the Clinton campaign or the DNC or any private friend of the President or First Lady to investigate any Members of Congress who were conducting investigations?

Answer. Of any Member of Congress?

Question. Of the President and First Lady.

Answer. Yes. In other words, investigate the investigators?

Question. Exactly.

Answer. No.

Question. There was testimony last month about the IGI group, Terry Lenzner's group, investigating Senator Nichols. Did you have any knowledge of anything like that going on in the '92 or '96 campaigns?

Answer. No. I believe I knew that Terry Lenzner was hired to do investigative work and was serving under Ickes' direction, but I had no idea what he was investigating.

Question. Do you know about Mr. Ickes hiring Mr. Lenzner?

Answer. I heard that he had done so. I don't know where I heard it, but I knew that he had, and I don't know anything further about it.

Question. Do you know who you heard that from?

Answer. No. I think I may just have read it in the newspaper earlier, while I was working there. But while I was there I knew the name Terry Lenzner and I knew that he worked for Ickes. I don't know how I knew it. I did know.

Question. Do you know anything——

Mr. BALLEN. This is not firsthand knowledge?

The WITNESS. No. I have no idea what he is doing. I have never spoken to him or anything like that.

[Discussion off the record.]

EXAMINATION BY MS. COMSTOCK:

Question. Was your understanding that Mr. Lenzner was hired in connection with the DNC work that Mr. Ickes was overseeing?

Answer. I don't know.

Ms. COMSTOCK. I believe that is all I have for now. Thank you.

The WITNESS. Thank you. Thanks very much.

EXAMINATION BY MR. BALLEN

Question. Mr. Morris, just a few questions. I want to, first of all, take this opportunity to thank you. Your testimony has been very forthcoming. We appreciate your coming and taking your time from your busy schedule. On behalf of the Minority members, we thank you for that.

You mentioned to Representative Cummings that you offered to list to him the Republican campaigns that you have worked on for years. I would like to take you up on that offer, if you could go through chronologically the significant Republican campaigns.

Answer. My memory of winners is better than losers.

Ms. COMSTOCK. Your memory is far better than most.

The WITNESS. Why don't I go through winners, or people that are serving in office.

EXAMINATION BY MR. BALLEN:

Question. That would be good.

Answer. In 1980, I worked for Paula Hawkins, Senator from Florida, in her election as Senator from Florida. I worked for Senator Warren Rudman from New Hampshire, Senator Paula Hawkins from Florida, and Senator Mark Andrews from North Dakota.

In 1982, I worked for Senator Pete Wilson from California. In 1980——

Question. That is all right, the dates.

Answer. '86, I worked for Governor Arch Moore of West Virginia. In 1988, I worked for Senator Trent Lott of Mississippi, and I worked for President Bush. In 1990, I worked for Governor William Weld of Massachusetts, Senator Jesse Helms of North Carolina, Senator Dan Coats of Indiana, and Senator Kay Bailey Hutchinson of Texas, and Senator Hank Brown of Colorado.

In 1994, I worked for—I worked for no successful Republican—no, I am sorry, 1992, no successful ones. In 1994, I worked for Governor Tom Ridge of Pennsylvania, Governor Don Sundquist of Tennessee, Senator Trent Lott, and Governor William Weld.

Question. Any Members of Congress? You mentioned Senators and Governors. Any Members of Congress? I believe you testified Congressman Jay Dickey.

Answer. Jay Dickey.

Question. Any other Members of Congress?

Answer. Congressman John Mica of Florida, who is a member of this committee.

Mr. LENEFSKY. Did you work for Ed?

The WITNESS. He is asking about Republicans.

Ms. COMSTOCK. Are you only asking Republicans?

Mr. BALLEN. That was my question.

Ms. COMSTOCK. Did you work for Mr. Schumer at some point, Chuck Schumer?

The WITNESS. Yes, I did, but he is only asking about Republicans. Congressman from Louisiana, Baton Rouge, Republican Congressman from Baton Rouge.

Ms. COMSTOCK. Tauzin?

The WITNESS. No, a next-door neighbor.

Ms. COMSTOCK. Baker?

The WITNESS. Richard Baker of Louisiana. That's it.

EXAMINATION BY MR. BALLEN:

Question. We have——

Answer. I am sorry, there are other Members no longer in the House. I worked for John Ashbrook of Ohio and maybe some other Republican House Members that are no longer serving, but I don't—that would take a whole other time for me to think about.

Question. I don't want to take any more time. I will note for the record we started this deposition at 9 o'clock. We are now at 3 o'clock. Most of the time you have been here you have discussed in detail the content of, over the objections of the Democratic side, you discussed the consent of ads that you reviewed with the President, political strategy, the markets, where those ads were run, the time-buys, polling, advice, considerations of political strategy, the formulation of advertisements, where the money was spent on advertisements, and I would assume, and correct me if I am wrong, Mr. Morris, that with all the names that you just mentioned, Senator Lott, Senator Coats, you also testified you consulted with Senator Gramm, Congressman Mica, et cetera, you had similar discussions with those candidates on their campaigns; is that correct?

Answer. That is correct. I never worked for Senator Gramm on his own campaigns. I worked for Senator Gramm in connection with the Republican Senate Campaign Committee.

Question. But you would have had similar conversations with Senator Gramm concerning the work on the Senate campaign committee on how ads were constructed, on coordination between the committee and other groups, and other candidates, et cetera. You would have had discussions with all of these candidates. Would that be a fair statement, sir?

Answer. Well, it is, except for when you get to the issue of coordination. I never engaged in any campaign discussions about coordination between expenditures of the campaign and independent expenditures, because I know that that's illegal.

Question. And that's the same case with the President's past campaign in 1996; is that correct?

Answer. Well, there was one occasion where there was an activity that smacked of coordination in which I was engaged that I rejected. There was a meeting in the Roosevelt Room——

Question. Why don't you describe that?

Answer. There was a meeting in the Roosevelt Room of the White House, and I do not recall the date, it was late '95 or early '96, that Mr. Ickes convened, at which he invited five or six people from the labor movement, from the labor community. I don't recall the names of the people, because I didn't know them, but there was somebody from AFSCME, there was somebody there from one of the teachers' unions. There was somebody there from COPE, C-O-P-E, the AFL, and I believe there was somebody there from the media firm of Victor Fingerhut, F-I-N-G-E-R-H-U-T, who does the advertising for the AFL, and I attended, Mark Penn attended, and I believe Bill Knapp attended.

Ms. COMSTOCK. Was the LIUNA union involved?

The WITNESS. What's LIUNA?

Ms. COMSTOCK. International——

The WITNESS. Labors International? I don't think so.

And from the White House there was Ickes and Sosnik, and Stephanopoulos may have been in that meeting, I'm not sure.

The purpose of the meeting was for the labor people to show us the ads that they had run and were planning to run, and I criticized their ads, because they failed to mention the balanced budget or tax cuts, and I felt they relied too much on rhetoric against tax breaks for the rich, which is something I was constantly opposed to our talking about.

They then invited me to coordinate my time-buying plan, our time-buying plans with them on a basis where, for example, they suggested we want to advertise in Vermont to go after Jeffords, and you don't care about winning Vermont particularly, so why don't we take Vermont, but you take, you know, Missouri, where it is a swing State. And I rejected it because—first of all, I rejected it partially because I felt it was not lawful, and, secondly, because I felt that their media was not only not helpful to the Clinton campaign, but destructive.

I am of the opinion that at this moment the Democrats would control the House of Representatives if the AFL–CIO never ran an ad. I believe their advertisements had more to do with the Democrats losing Congress in '96 than any Republican ad. And I felt that the stark left-right comparisons that they were attempting to make were totally against the strategy I had in mind, and in fact, I decided that when I learned that they were advertising, I'd make a point that we would advertise to repair the damage. But that was the only—and that meeting ended on a rather unhappy note, because I did express my views fairly frankly, and there was, in fact, no coordination, but that's the only time when I have ever been in a meeting in connection with coordination.

EXAMINATION BY MR. BALLEN:

Question. And at that meeting, you rejected that firmly?

Answer. Yes.

Question. What happened as a result of your rejection?

Answer. I don't know, but I know that I was never involved, nor were any of the consultants that worked with me to my knowledge ever involved in any coordination with any independent expenditure, including the AFL.

Question. So you were comfortable with the fact that you were never involved or anyone you were in contact with was involved with any coordination with the AFL or any other group like that?

Answer. That's right. That's correct.

Question. And no one asked you to coordinate at any time subsequent to that meeting?

Answer. That's correct.

Question. So back——

Answer. And it should be noted that the request for coordination did not come from Mr. Ickes, it came from someone from the labor community.

Question. And you rejected it?

Answer. Yes.

Ms. COMSTOCK. What was Mr. Ickes' response.

The WITNESS. I don't believe he had one. The minute they mentioned it, I jumped all over it, because I hated the ads.

EXAMINATION BY MR. BALLEN:

Question. And that was the end of it as far as you knew?

Answer. Yes.

Question. But back to, let me just review and then I think you already answered the question, but the kinds of issues that you discussed at great length today about assistance and advise that you gave the President in the 1996 campaign, you could also discuss with all the other people that you represented in varying degrees over the years; isn't that correct?

Answer. That's correct.

Question. There is nothing particularly—I mean, there may be unique features to the President's campaign, but there is nothing particularly unique about the kinds of issues or strategy or ad concerns or other things that you discussed; is that correct?

So if you were asked—let me finish this. If you were asked at a future date to describe what ads were run for Senator Lott or what ads might have been run for Senator Coats or what discussions you may or may not have had with Senator Coats or Senator Lott, you could answer those questions?

Answer. Yes, I could. The only unique feature of the Clinton campaign was that I never previously worked on an issue advocacy advertising campaign for a national committee.

Question. All right. And you have already testified in length as to that?

Answer. Yes.

Mr. BALLEN. Thank you very much.

Ms. COMSTOCK. I just have a few follow-up questions.

EXAMINATION BY MS. COMSTOCK:

Question. In any of those other campaigns that you were talking about, were you aware of millions of dollars being returned after you had worked on the campaign?

Mr. BALLEN. I am going to object because he has testified he wasn't involved in fund-raising.

Ms. COMSTOCK. I am just saying if he is aware or any knowledge, or learned from it.

Mr. BALLEN. From reading the newspapers?

Ms. COMSTOCK. Exactly. If he was aware of millions of dollars of campaign contributions——

Mr. BALLEN. Well, you can ask him about anything in the newspapers, if he has personal knowledge.

The WITNESS. I have no knowledge of millions of dollars being returned.

EXAMINATION BY MS. COMSTOCK:

Question. On the meeting that you talked about with Harold Ickes, the labor meeting, was it your understanding that Harold Ickes set up that meeting?

Answer. Yes.

Question. And do you recall who asked you to come to the meeting?

Answer. No. I mean, someone on Ickes' staff told someone on my staff that I had to come. It was not Harold who personally invited me, but I don't know who from their staff spoke to who on my staff. I just was told by someone on my staff that Ickes wanted me at this meeting.

Question. Who usually invited you? I mean, who from Ickes' staff contacted your staff when he invited you to meetings?

Answer. He very rarely did, but when he did, it was usually Janice Enright.

Question. And she would contact one of your assistants?

Answer. Yes.

Question. And you had previously testified that usually you tried to avoid each other, essentially?

Answer. Yes. We communicated with each other chiefly through leaks.

Question. Are you aware of Mr. Ickes working with any voter participation groups?

Answer. Not specifically, but I—that would have fallen within his mandate.

Question. Do you have any knowledge of him—do you know anyone named Gary Barron?

Answer. No.

Question. Did you have any knowledge, prior to the news reports, about the situation with Warren Meddoff receiving the fax from Mr. Ickes asking for contributions to a number of groups, including Vote Now and an antiproposition 209 group? Did you have any knowledge about those events prior to the news reports?

Answer. No.

Question. Okay. Have you learned of anything about—since the news reports or through any source about Mr. Ickes coordinating with any of these voter participation groups?

Answer. No.

Question. Do you know how he would have gotten their bank account numbers or have any of that type of information?

Answer. No.

Question. In your book, you described the President is very hands-on and very involved in his re-election campaign. Is that a fair characterization of his participation?

Answer. Yes.

Question. And is very detail oriented and attentive to a lot of the things that you were working on?

Answer. Yes.

Question. And very interested in what you were working on?

Answer. Yes.

Question. And wanted to know on a day-to-day basis what it was that you were working on, or week-to-week?

Answer. Yes.

Question. Was that your understanding of how he dealt with Mr. Ickes, also?

Mr. LENEFSKY. If you know.

The WITNESS. I was not really privy to his discussions with Ickes, so I really can't comment on—I can't comment on that.

EXAMINATION BY MS. COMSTOCK:

Question. From your discussions with the President, did you have a sense of how often the President spoke with Harold Ickes?

Answer. Whenever I was—yes, I had the sense, both from personal observation and from times that I would call Ickes' office and learn that he wasn't there, that he saw the President at least every day and usually very frequently throughout the day.

Question. Did he often travel with the President during the campaign?

Answer. Yes.

Question. And did you have one of your assistants traveling with the President also during the campaign?

Answer. On political trips only paid for by the Clinton/Gore campaign. I was not permitted to have anyone travel on official trips, and where the trip was funded by the DNC, I was also generally not permitted to have someone there.

Question. Was that Tom Freedman who usually went on those trips?

Answer. Tom Freedman most often. Sometimes Mark Penn.

Question. Did either Tom Freedman or Mark Penn ever tell you about donors flying on Air Force One or anything to that effect?

Answer. No. I never flew on Air Force One.

Question. All right.

Again, you were describing that the President was very involved in the details. I was wondering, do you have any reason to believe that the President has any memory problems or any problem with recalling events?

Mr. BALLEN. I am going to object to that kind of a question.

Mr. LENEFSKY. I will object, also.

EXAMINATION BY MS. COMSTOCK:

Question. From your experience of knowing the President for over 20 years, does he have a good memory?

Answer. Yes.

Ms. COMSTOCK. I believe that's all I have today. Thank you for your time.

[Whereupon, at 3:15 p.m., the deposition was concluded.]

[The exhbits referred to follow:]

General - DNC

Doug: -
Advisable to send or not?
(Harold)
DS says no.

17 April 1996

MEMORANDUM TO CHAIRMAN FOWLER

CC: Chairman Dodd
B.J. Thornberry
Marvin Rosen
Brad Marshall
Doug Sosnik
Karen Hancox

From: Harold Ickes

Re: 15 April 1996 meeting

This confirms the meeting that you and I and Doug Sosnik had on 15 April 1996 at your office during which it was agreed that all matters dealing with allocation and expenditure of monies involving the Democratic National Committee ("DNC") including, without limitation, the DNC's operating budget, media budget, coordinated campaign budget and any other budget or expenditure, and including expenditures and arrangements in connection with state splits, directed donations and other arrangements whereby monies from fundraising or other events are to be transferred to or otherwise allocated to state parties or other political entities and including any proposed transfer of budgetary items from DNC related budgets to the Democratic National Convention budget, are subject to the prior approval of the White House. It was agreed that a small working committee would be established which would include Chairman Fowler (or his representative), Chairman Dodd (or his representative), B.J. Thornberry, Brad Marshall, Marvin Rosen, Doug Sosnik, and others as may be agreed to, to meet at least once weekly, and more often if necessary, to implement this agreement.

EXHIBIT
RM-1

Donald L. Fowler
Chair, Democratic National Committee

fwd to 10/12 10:32 CAL

12 Oct 95

Bill,

Thank you for returning my call today.

Attached is an info. sheet about our efforts to raise money to fund $10,000,000 of paid TV ads. over an eight week period during Oct & Nov. This effort is at the specific direction of The Pres.

We would like for you to give some more if you can, but more important, get some others to help. We really need another $250,000. Thanks. Best wishes. Don

430 South Capitol Street, SE • Washington, D.C. 20003
(202)863-8121 • Fax (202)863-8174

DNC 3103698

Knapp

SQUIER • KNAPP • OCHS
COMMUNICATIONS

Robert D. Squier
William N. Knapp
Thomas Ochs
Anita Dunn
Senior Vice President

MEMORANDUM

TO: CHAIRMAN DON FOWLER

FROM: SQUIER/KNAPP/OCHS

DATE: OCTOBER 5, 1995

RE: OCTOBER MEDIA FLIGHT

The DNC spot "Emma" is currently on the air in 42 markets within 19 states. The spot began airing on Tuesday, October 3 or Wednesday, October 4 (depending on market) and will run through Tuesday October 10 or Wednesday, October 11. The total cost of the buy, which was paid for by the DNC and the State Democratic parties, is $1.2 million.

The spot will get between 300-400 points per market. A point is a percentage of TV households. That means, at 400 points, each household will see the spot "Emma" approximately four times. The markets were selected based on polling, strategic and tactical considerations and do not represent the party's final targeting goals.

The spot was thoroughly tested prior to airing. A nationwide poll was used to develop the ad, and a series of "mall tests" were performed to fine-tune the spot and ensure its effectiveness.

The text of the 30-second spot highlights the President's plan to secure Medicare without new costs to our elderly; unlike the Republican plan that includes $270 billion in cuts, a doubling of premiums and deductibles, and a raising of the eligibility age to 67 from 65.

Bill,
Each week, the flight (media buy) will be $1.2 mil
for 8 weeks -- not necessarily in the same markets
D.

311 2ND Street, NE Washington, D.C. 20002
202 547-4970 FAX: 202 543-6911

EARLY OCTOBER MEDIA BUY
10/3/95 - 10/12/95

STATE	MARKET	GRP'S	COST
Arkansas	Little Rock	400	$18,860
California	Chico-Redding	300	$6,210
	Sacramento	300	$43,815
	Santa Barbara	300	$11,385
Colorado	Denver	400	$58,420
Florida	Miami-Ft. Lauderdale	300	$74,175
	Tampa-St. Pete	300	$58,995
Iowa	Cedar Rapids	400	$12,880
	Des Moines	400	$12,420
Illinois	Peoria	400	$10,120
	Rockford	400	$9,200
	Springfield-Decatur	400	$15,640
Kentucky	Lexington	400	$15,180
	Louisville	400	$23,920
HOLD→ Louisiana	Baton Rouge	400	$12,420
	New Orleans	400	$27,600
Maine	Portland	300	$16,560
Michigan	Detroit	400	$75,900
	Flint-Saginaw	400	$16,560
	Traverse-Cadillac	400	$9,660
Minnesota	Duluth-Superior	400	$8,280
	Minn.-St. Paul	400	$64,400
Missouri	Columbia-Jeff. City	400	$7,360
	St. Louis	400	$47,840
New York	Burlington-Plattsburg	400	$16,100
	Elmira	400	$7,820
will not accept	Syracuse	400	$19,320
	Utica	400	$9,660
	Watertown	400	$8,280

Ohio	Cleveland	300	$44,850
	Toledo	300	$13,455
Oregon	Portland	400	$42,320
Pennsylvania	Erie	400	$6,440
	Harrisburg-York-Lan.	400	$36,340
	Johnstown-Altoona	400	$12,420
	Philadelphia	400	$131,100
	Wilkes-Barre/Scranton	400	$19,780
Rhode Island	Providence	300	$24,840
Tennessee	Knoxville	300	$14,490
	Nashville	300	$26,565
Washington	Seattle-Tacoma	400	$76,360
	Spokane	400	$20,700
Wisconsin	Green Bay	400	$13,800
	Madison	400	$14,260
	Milwaukee	400	$37,720
TOTAL BUY:			**$1,254,420**
TOTAL % of U.S. COVERED:			**27.98%**

26 June 1996

MEMORANDUM TO CHAIRMAN DODD
CHAIRMAN FOWLER
B.J. THORNBERRY
BRAD MARSHALL

CC: Doug Sosnik
Karen Hancox
Jennifer O'Connor

From: Harold Ickes

Re: Bills for Squier/Knapp and Penn and Schoen

Until further notice, I request that you hold payments on all bills of any kind (other than for time buys) owed to Squier/Knapp and to Penn and Schoen until they have clarified a number of questions and have provided adequate documentation regarding outstanding bills they have submitted. In my view they are not adhering to the rules regarding expenses and other matters.

In addition, although in the past you have permitted Squier/Knapp to pay their travel related and other expense bills out of excess time buy which they hold, henceforth, I urge that this practice be stopped immediately.

They only expenses ever paid for out of excess time buy was production costs - never travel-related or other expense bills.

CGRO-10924
Req.5/28/97

EXHIBIT
RM-3

FEC Reports

- last – Cannot – Intense activity / paying checks
  Oct 15 & Election Day

~~[illegible]~~ –

- FEC doesn't audit – State Committees at random or automatically
- Only 2 ways investigation instituted
  (1) Internally generated
  (2) Complaint
- Most internally generated vs. state parties are picked up from Pub Reports → State factors give themselves away
- Some common problems
  (1) Candidate names →
  ~~Smith for~~ Clinton mailing
  Smith for Senate backup

Make sure it's covered –
– Exempt activity – – assign code
& use on ~~[illegible]~~ H2 & Check exempt on H4
– If you can't cover as exempt & it's congressional, consider reporting as 441c(d)

EXHIBIT
RM-4

DNC 3096675

Most ~~&~~ Authy isn't used up
2) If you've kept it, use it
to cover yourself

(B) Apparently illegal sources —

~~(B) Corps — "ch" of~~

(1) Unregistered PACs → State PACs
or organizations
They'll check / Common to see "PAC"

(2) Associations / Orgs — who "purchase"
Materials O/ other folks
It's a contribution

(3) Contr from state / local to coord →
shd have gone to non-Fed'l &
then get transferred over — not
directly into Fed acct

~~(4) Unions~~

(5) Fed from coord — "Excess
Campaign Funds" / Put it down

(*) What can you do? Refund, w/in
30 days (exceed limits — 60
days / Even later — ~~[illegible]~~

- What worked & what didn't / legal / tracking thru happy 3 obstacles accomplishe

- Thought that we can put lessons to use in future Coord campaigns beginning next state

What worked

① Way up learning curve in terms of how to (3 use) move the money thru state parties in the presidential — / Coord campaigns

— Intensive training by DNC / ASDC of Chairs & LO's, State Party staff starting early Fall of 1989 in Primary Point NH

Exempt & Allocation Rules

Result main more sensitivity by campaign to state party's availability

② — Excellent operation real at early consultation / agreement on strategies

DNC / C / Gore / & State Party atty

Budget & Expenditure

Kept us all on the same wave length / Shd be expected

③ → Big diff from 88 → — Training — 3 way party consul.

More sophisticated use of free media

State party / Coord campaign staff involved in daily message / free media

advance

good way to put resources to work for presidential

Hard cost to Cut thru a lot of confusion & uncertainty

④ Transfer down

④ Inability to use fed. $ provided by DNC for fed share except activities

State Parties got into trouble

Separate fed'l accounts for ~~exem~~ those activities & for admin/oh so that everyone could be comfortable that DNC fed'l money used in a permissible way =

Hasn't been tested in FEC proceeding but we're fairly confident will stand up

(4) ~~Could accomplish~~ Tricks/exempt activities

- I'd followed by ~~generic~~ GOTV planning that could be done paid
- Paid i.d. followed by ~~general~~ volunteer GOTV calling
- Better defined volunteer mailing — one of a consensus/clear line which did make it easier to plan & structure

What Didn't Work

~~(1) Getting [illegible] the state parties Much better [illegible] state~~

(1) Volunteers / big stakes — pulled
44(d) — state parties / discussed

— Except activities
— Mail & phone

② Get $ directly to state parties
~~still~~ ~~continue~~ Much better but still a problem

• Joint Fundraising / early planning
draw of nat'l events can be used

• New ways to beef up
Fed's

DNC 3096679

① Marcus — (CT)

present ~~to~~ St Chair to give local candidates to endorsem Cong. incumbents

"Advisory Committees" in 50 states

Recommend people

"Cluster Teams"

for Appointments

→ Betsey Wright

→ David Wilhelm

(Karen or Vinny)

Lillie Rose C/G Transition 105 W Capitol

LR / AW

Craig Smith

DNC 3096680

Regional Directors — in Little Rock
(to be named)

D.C. to David Wilhelm
1120 VT Ave NW
Wash D.C. 20005

Cluster Groups will provide audits & agencies — reports / fact finding
Not appointments

DNC 3096681

November 20, 1995

TO: Harold Ickes
FR: Don Fowler, Marvin Rosen, Scott Pastrick and Richard Sullivan
RE: Additional DNC Fundraising Requests

The following information is submitted in response to information requested concerning the possibility of raising an additional 4 million to be applied to paid television. Because of the short lead time and lack of time to cultivate additional donors, we believe the following represents the maximum that can be raised prior to year end. (Additional to prior projections.)

POTUS

1. 18-20 calls by POTUS
   10 calls by VPOTUS

This will provide us with an advantage to assure our projections and assist in raising an additional $1.2 million.

2. One additional DC luncheon and one additional DC dinner.

These will raise a total of $1 million.

3. One White House Holiday Dinner

This dinner will be an accountability event for prior projections and commitments.

VPOTUS

1. Two events in any of the following cities. New York, New Jersey, Long Island or Philadelphia.

Each would raise $250,000 totalling $500,000.

FLOTUS

1. Two events in any of the following cities. New York, New Jersey or Long Island.

Each would raise $250,000 totalling $500,000.

SUMMARY

1. POTUS and VPOTUS Calls	1,200,000
2. POTUS DC Lunch	500,000
3. POTUS DC Dinner	500,000
4. White House Dinner	
5. VPOTUS Event	250,000
6. VPOTUS Event	250,000
7. FLOTUS Event	250,000
8. FLOTUS Event	250,000
TOTAL -	3,200,000

We believe $3,200,000 is the maximum we can raise.
* Of the 3,200,000, approximately 2,200,000 will be received by 12/31.

DNC 3234267

EXHIBIT
RM-5

December 20, 1995

TO: Harold Ickes and Karen Hancox

FR: Marvin Rosen and Richard Sullivan

RE: DNC Finance Update

****

Major donor projection for 10/20/95 - 12/31/95	$ 8,900,000
Received as of 12/20/95	$ 8,850,000

Best projection to be received by December 31 is an additional $ 500,000 - $ 900,000

****

Additional projection based on phone calls of VPOTUS and POTUS	$ 1,000,000
Received to date from VPOTUS calls	$ 195,000
Commitments from VPOTUS calls not yet collected (approximate)	$ 65,000
To be received from Labor on Thursday, re: Terry McAuliffe	$ 400,000
Total	$ 660,000

Need additional phone calls of POTUS and VPOTUS to get balance of $ 340,000 to make $ 1,000,000 projection.

DNC 3234272

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2/27/97 TODAY (No Page)
2/27/97 Today (Pg. Unavail. Online)
1997 WL 6085044
(Publication page references are not available for this document.)

Today
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Thursday, February 27, 1997

Newscast: President Clinton defends fund-raising tactics

ANN CURRY, anchor:

With a campaign fund-raising controversy swirling around him, President Clinton hosted a state dinner last night that included major political contributors as guests. Among those invited to the dinner honoring the president of Chile were the presidents of two unions that gave the Democratic Party $1 million for the 1996 election. Meantime, there is new evidence about White House fund-raising tactics, and the president is defending them as "entirely appropriate." NBC's Jim Miklaszewski reports.

JIM MIKLASZEWSKI reporting:

Despite the growing controversy over Democratic political fund-raising, President Clinton sees no need for an independent counsel to investigate.

President BILL CLINTON: I've answered the questions about that, and I don't think there is a legal issue there.

MIKLASZEWSKI: But there's more evidence that the White House was for sale to big political contributors. One Democratic fund-raiser told NBC News that last summer $250,000 bought a day at the White House, with swimming pool privileges and a barbecue. Two years ago, when a dozen contributors were treated to the movie "Wolf" in the White House theater, a White House memo clearly labeled it a DNC fund-raiser. Records show it raised $650,000. President Clinton

joked, however, that not all White House perks brought in as much money as he had hoped.

Pres. CLINTON: You'll find that sometimes they did and sometimes they didn't.

MIKLASZEWSKI: One White House coffee with Texas contributors, that was supposed to raise $500,000, came up short and brought in less than 300,000. On a New York radio talk show, the president's personal friend and former political adviser Dick Morris revealed Mr. Clinton's voracious appetite for political money.

Mr. DICK MORRIS: I'm surprised he didn't auction off places in his own bedroom.

Unidentified Host: Well, he was...

Mr. MORRIS: He'd probably sleep on the floor if someone would give him a million.

MIKLASZEWSKI: Campaign watchdogs are not amused.

Ms. ANN McBRIDE (Common Cause): To use the White House, to use the office of the presidency for fund-raising, for raising these huge corrupting campaign contributions is outrageous.

MIKLASZEWSKI: Nevertheless, Clinton aides are confident that the White House took all this political fund-raising right up to the legal limit but didn't break any laws. Jim Miklaszewski, NBC News, the White House.

Program Time: 7:00-9:00 AM
Nielson Rating 5049330
Reference: 970227

Word Count: 380
2/27/97 TODAY (No Page)
END OF DOCUMENT

WIN IN '96

DEMOCRATIC NATIONAL COMMITTEE

430 South Capitol Street, S.E. • Washington, D.C. 20003

SQUIER KNAPP

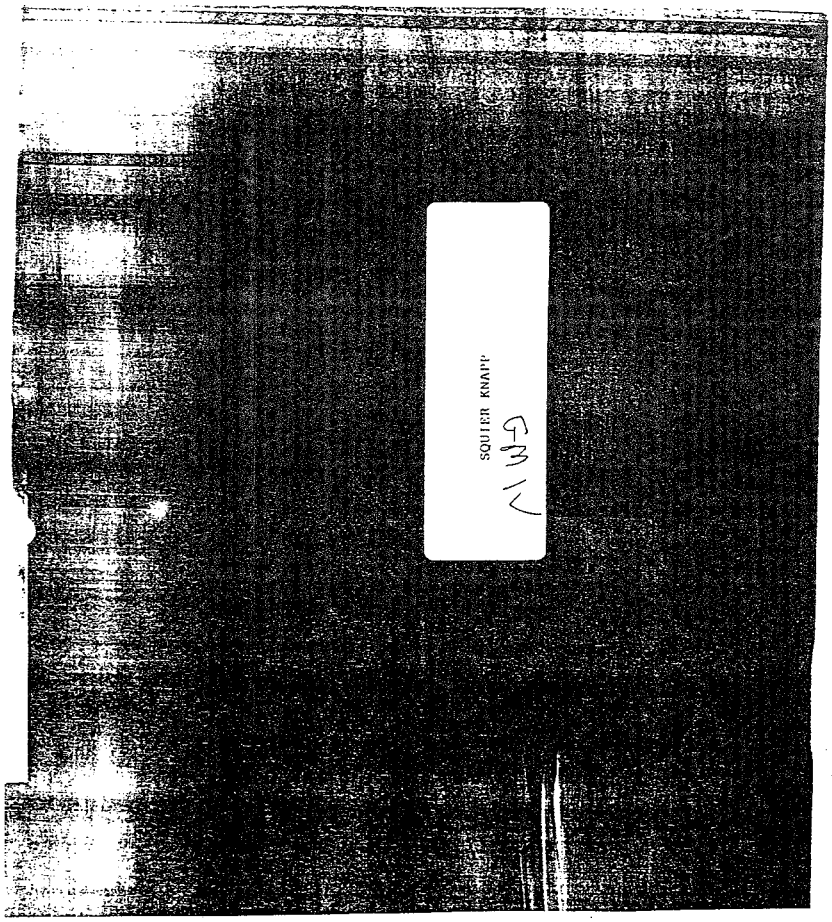
GENERIC MEDIA

IV

EXHIBIT

PM-8

DNC 3096923



DNC 3096924

DNC MEDIA BUY
6/1 - 6/7

SPOT	MARKET	STATION	GRP's
	CALIFORNIA		
SIDE	CHICO		250
		KCPM-TV	
		KHSL-TV	
		KRCR-TV	
SIDE	SACRAMENTO		400
		KCRA-TV	
		KOVR-TV	
		KQCA-TV	
		KXTV-TV	
		KPWB-TV	
		KTXL-TV	
SIDE	SAN DIEGO		450
		KFMB-TV	
		KGTV-TV	
		KNSD-TV	
		KUSI-TV	
SIDE	SANTA BARBARA		250
		KCOY-TV	
		KEYT-TV	
		KSBY-TV	
SIDE	BAKERSFIELD		250
		KBAK-TV	
		KERO-TV	
		KGET-TV	
SIDE	FRESNO		250
		KFSN-TV	
		KJBO-TV	
		KMPH-TV	
		KSEE-TV	

-Confidential Information

DNC 3096925

SPOT	MARKET	STATION	GRP's
SIDE	LOS ANGELES		300
		KCBS-TV	
		KNBC-TV	
		KABC-TV	
		KTTV-TV	
		KTLA-TV	
		KCAL-TV	
	COLORADO		
SIDE	COLORADO SPRINGS		250
		KKTV-TV	
		KOAA-TV	
		KRDO-TV	
SIDE	GRAND JUNCTION		250
		KJCT-TV	
		KREX-TV	
SIDE	DENVER		350
		KCNC-TV	
		KMGH-TV	
		KUSA-TV	
		KWGN-TV	
	CONNECTICUT		
SIDE	HARTFORD		250
		WFSB-TV	
		WTIC-TV	
		WTNH-TV	
		WVIT-TV	
	FLORIDA		
SIDE	TAMPA-ST. PETERSBURG		250
		WFLA-TV	
		WFTS-TV	
		WTSP-TV	
		WTVT-TV	
SIDE	PANAMA CITY		250
		WJHG-TV	
		WMBB-TV	

Confidential Information

DNC 3096926

SPOT	MARKET	STATION	GRP's
SIDE	TALLAHASSEE		250
		WCTV-TV	
		WTWC-TV	
		WTXL-TV	
SIDE	ORLANDO		250
		WCPX-TV	
		WESH-TV	
		WKCF-TV	
SIDE	JACKSONVILLE		250
		WJKS-TV	
		WJXT-TV	
		WTLV-TV	
SIDE	FT. MYERS		250
		WBBH-TV	
		WFTX-TV	
		WINK-TV	
		WZVN-TV	
	GEORGIA		
SIDE	ATLANTA		325
		WAGA-TV	
		WGNX-TV	
		WSB-TV	
		WXIA-TV	
SIDE	ALBANY		300
		WALB-TV	
SIDE	MACON		300
		WPGA-TV	
		WMAZ-TV	
		WMGT-TV	
SIDE	AUGUSTA		325
		WAGT-TV	
		WJBF-TV	
		WRDW-TV	
SIDE	COLUMBUS		300
		WRBL-TV	
		WTVM-TV	

Confidential Information

DNC 3096927

SPOT	MARKET	STATION	GRP's
SIDE	SAVANNAH		300
		WJCL-TV	
		WSAV-TV	
		WTOC-TV	
	ILLINOIS		
SIDE	CHICAGO		400
		WBBM-TV	
		WFLD-TV	
		WLS-TV	
		WMAQ-TV	
	IOWA		
SIDE	CEDAR RAPIDS		350
		KCRG-TV	
		KGAN-TV	
		KWWL-TV	
SIDE	DES MOINES		350
		KCCI-TV	
		WHO-TV	
		WOI-TV	
SIDE	DAVENPORT		500
		KWQC-TV	
		WHBF-TV	
		WQAD-TV	
		KLJB-TV	
SIDE	SIOUX CITY		250
		KCAU-TV	
		KMEG-TV	
		KTIV-TV	
SIDE	ROCHESTER-MASON CITY		375
		KAAL-TV	
		KIMT-TV	
		KTTC-TV	

Confidential Information

DNC 3096928

SPOT	MARKET	STATION	GRP's
	KENTUCKY		
SIDE	LOUISVILLE		450
		WAVE-TV	
		WDRB-TV	
		WHAS-TV	
		WLKY-TV	
SIDE	EVANSVILLE		250
		WEHT-TV	
		WEVV-TV	
		WFIE-TV	
		WTVW-TV	
SIDE	PADUCAH		400
		KFVS-TV	
		WPSD-TV	
		WSIL-TV	
SIDE	LEXINGTON		425
		WDKY-TV	
		WKYT-TV	
		WLEX-TV	
		WTVQ-TV	
	LOUISIANA		
SIDE	NEW ORLEANS		400
		WDSU-TV	
		WGNO-TV	
		WVUE-TV	
		WWL-TV	
SIDE	BATON ROUGE		250
		WBRZ-TV	
		WAFB-TV	
		WGMB-TV	
		WVLA-TV	
SIDE	ALEXANDRIA		250
		KALB-TV	
		KLAX-TV	

Confidential Information

DNC 3096929

SPOT	MARKET	STATION	GRP's
SIDE	MONROE		250
		KNOE-TV	
		KTVE-TV	
SIDE	LAFAYETTE		250
		KATC-TV	
		KLFY-TV	
SIDE	SHREVEPORT		400
		KSLA-TV	
		KTAL-TV.	
		KTBS-TV	
	MAINE		
SAME	PORTLAND		250
		WCSH-TV	
		WGME-TV	
		WMTW-TV	
		WPXT-TV	
SAME	BANGOR		250
		WABI-TV	
		WLBZ-TV	
		WVII-TV	
SAME	PRESQUE ISLE		250
		WAGM-TV	
	MICHIGAN		
SIDE	DETROIT		425
		WDIV-TV	
		WJBK-TV	
		WKBD-TV	
		WWJ-TV	
		WXYZ-TV	
		WXON-TV	
SAME	FLINT		400
		WEYI-TV	
		WJRT-TV	
		WNEM-TV	

Confidential Information

DNC-3096930

SPOT	MARKET	STATION	GRP's
SAME	TRAVERSE CITY		400
		WGTU-TV	
		WPBN-TV	
		WWTV-TV	
SIDE	LANSING		400
		WILX-TV	
		WLAJ-TV	
		WLNS-TV	
		WSYM-TV	
SAME	GRAND RAPIDS		250
		WOOD-TV	
		WWMT-TV	
		WZZM-TV	
	MINNESOTA		
SIDE	MINNEAPOLIS-ST. PAUL		250
		KARE-TV	
		KMSP-TV	
		KSTP-TV	
		WCCO-TV	
	MISSOURI		
SIDE	COLUMBIA-JEFFERSON CITY		425
		KMIZ-TV	
		KOMU-TV	
		KRCG-TV	
SIDE	ST. LOUIS		450
		KDNL-TV	
		KMOV-TV	
		KPLR-TV	
		KSDK-TV	
		KTVI-TV	
SIDE	JOPLIN-PITTSBURGH		250
		KOAM-TV	
		KODE-TV	
		KSNF-TV	

Confidential Information

DNC 3096931

SPOT	MARKET	STATION	GRP's
SIDE	KANSAS CITY		425
		KCTV-TV	
		KMBC-TV	
		KSHB-TV	
		WDAF-TV	
SIDE	ST. JOSEPH		250
		KQTV-TV	
SIDE	SPRINGFIELD		250
		KOLR-TV	
		KSPR-TV	
		KYTV-TV	
	NEVADA		
SIDE	RENO		250
		KOLO-TV	
		KRNV-TV	
		KTVN-TV	
SIDE	LAS VEGAS		400
		KLAS-TV	
		KTNV-TV	
		KUPN-TV	
		KVBC-TV	
		KVVU-TV	
	NEW MEXICO		
	ALBUQUERQUE		
		KOAT-TV	
		KOB-TV	
		KRQE-TV	
	NORTH CAROLINA		
SIDE	GREENSBORO		250
		WFMY-TV	
		WGHP-TV	
		WXII-TV	
		WXLV-TV	

SPOT	MARKET	STATION	GRP's
SIDE	CHARLOTTE		250
		WBTV-TV	
		WCCB-TV	
		WCNC-TV	
		WSOC-TV	
SIDE	RALEIGH-DURHAM		250
		WNCN-TV	
		WNCN-TV	
		WRAL-TV	
		WTVD-TV	
	OHIO		
SIDE	CLEVELAND		450
		WEWS-TV	
		WJW-TV	
		WKYC-TV	
		WOIO-TV	
		WUAB-TV	
SIDE	TOLEDO		450
		WNWO-TV	
		WTOL-TV	
		WTVG-TV	
SIDE	CINCINNATI		450
		WCPO-TV	
		WKRC-TV	
		WLWT-TV	
		WXIX-TV	
SIDE	DAYTON		250
		WDTN-TV	
		WHIO-TV	
		WKEF-TV	
SIDE	YOUNGSTOWN		250
		WFMJ-TV	
		WKBN-TV	
		WYTV-TV	

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DNC 3096933

SPOT	MARKET	STATION	GRP's
SIDE	COLUMBUS		250
		WBNS-TV	
		WCMH-TV	
		WSYX-TV	
	OREGON		
SIDE	MEDFORD		250
		KDRV-TV	
		KOBI-TV	
		KTVL-TV	
SIDE	PORTLAND		250
		KATU-TV	
		KGW-TV	
		KOIN-TV	
		KPTV-TV	
SIDE	EUGENE		250
		KEZI-TV	
		KLSR-TV	
		KMTR-TV	
		KVAL-TV	
	PENNSYLVANIA		
SIDE	ERIE		400
		WICU-TV	
		WJET-TV	
		WSEE-TV	
SIDE	HARRISBURG		250
		WGAL-TV	
		WHP-TV	
		WHTM-TV	
		WPMT-TV	
SIDE	JOHNSTOWN-ALTOONA		375
		WATM-TV	
		WJAC-TV	
		WTAJ-TV	
		WWCP-TV	

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DNC 3096934

SPOT	MARKET	STATION	GRP's
SIDE	PHILADELPHIA		450
		KYW-TV	
		WCAU-TV	
		WTXF-TV	
		WPVI-TV	
SIDE	WILKES-BARRE		400
		WBRE-TV	
		WNEP-TV	
		WYOU-TV	
		WOLF-TV	
SIDE	PITTSBURGH		250
		KDKA-TV	
		WPXI-TV	
		WTAE-TV	
	TENNESSEE		
SIDE	KNOXVILLE		500
		WATE-TV	
		WBIR-TV	
		WKXT-TV	
SIDE	NASHVILLE		500
		WKRN-TV	
		WSMV-TV	
		WTVF-TV	
		WZTV-TV	
SIDE	MEMPHIS		475
		WPTY-TV	
		WMC-TV	
		WREG-TV	
SIDE	CHATTANOOGA		400
		WDEF-TV	
		WRCB-TV	
		WTVC-TV	
		WDSI-TV	

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DNC 3096935

SPOT	MARKET	STATION	GRP's
	TEXAS		
SIDE	BEAUMONT		200
		KBMT-TV	
		KFDM-TV	
		KJAC-TV	
SIDE	AUSTIN		200
		KEYE-TV	
		KTBC-TV	
		KVUE-TV	
		KXAN-TV	
SIDE	TYLER		200
		KETK-TV	
		KFXK-TV	
		KLTV-TV	
SIDE	WACO		200
		KBTX-TV	
		KCEN-TV	
		KXXV-TV	
	WASHINGTON		
SIDE	SEATTLE		450
		KING-TV	
		KIRO-TV	
		KOMO-TV	
		KSTW-TV	
		KCPQ-TV	
SIDE	SPOKANE		250
		KHQ-TV	
		KREM-TV	
		KXLY-TV	
SIDE	YAKIMA		250
		KAPP-TV	
		KCYU-TV	
		KIMA-TV	
		KNDO-TV	

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DNC 3096936

SPOT	MARKET	STATION	GRP's
	WISCONSIN		
SIDE	GREEN BAY		250
		WBAY-TV	
		WFRV-TV	
		WGBA-TV	
		WLUK-TV	
SIDE	MADISON		250
		WISC-TV	
		WKOW-TV	
		WMTV-TV	
SIDE	MILWAUKEE		250
		WDJT-TV	
		WISN-TV	
		WITI-TV	
		WTMJ-TV	
SIDE	LA CROSSE		250
		WEAU-TV	
		WKBT-TV	
		WXOW-TV	
SIDE	WAUSAU		250
		WAOW-TV	
		WJFW-TV	
		WSAW-TV	
	TOTAL TV EXPENDITURES:		

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DNC 309693

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COMMUNICATIONS

Robert D. Squier
William N. Knapp
Thomas Ochs
Anita Dunn
Senior Vice President

DNC MEDIA BUY
6/12 - 6/18

SPOT	MARKET	STATION	GRP's	$/TOTALS
	ARKANSAS			$12,005.40
Dreams ~~ASTRONAUT~~	LITTLE ROCK		300	$12,005.40
		KARK-TV		$2,878.37
		KATV-TV		$7,421.52
		KTHV-TV		$1,705.31
	CALIFORNIA			$289,766.70
ASTRONAUT	CHICO		300	$4,338.32
		KCPM-TV		$809.46
		KHSL-TV		$1,564.34
		KRCR-TV		$1,964.52
ASTRONAUT	SACRAMENTO		350	$41,177.61
		KCRA-TV		$21,873.48
		KOVR-TV		$4,615.71
		KPWB-TV		$864.03
		KTXL-TV		$4,274.65
		KXTV-TV		$9,549.75
ASTRONAUT	SAN DIEGO		475	$57,889.68
		KFMB-TV		$12,187.30
		KGTV-TV		$19,326.88
		KNSD-TV		$23,988.06
		KUSI-TV		$2,387.44
ASTRONAUT	SANTA BARBARA		300	$11,100.45
		KCOY-TV		$2,310.13
		KEYT-TV		$4,079.11
		KSBY-TV		$4,711.21
ASTRONAUT	BAKERSFIELD		300	$6,043.63
		KBAK-TV		$1,418.82
		KERO-TV		$1,996.35
		KGET-TV		$2,628.46

511 2ND Street, NE Washington, D.C. 20002
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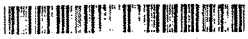

DNC 3096938

[The deposition of Eric Sildon follows:]

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT,
U.S. HOUSE OF REPRESENTATIVES,
Washington, DC.

DEPOSITION OF: ERIC SILDON

TUESDAY, JULY 29, 1997

The deposition in the above matter was held in Room 2203, Rayburn House Office Building, commencing at 10:00 a.m..

Appearances:

Staff Present for the Government Reform and Oversight Committee: James C. Wilson, Senior Investigative Counsel; Miki White, Investigative Counsel; Maria Wusinich Intern; Kenneth Ballen, Minority Chief Investigative Counsel; and Christopher Lu, Minority Counsel.

For MR. SILDON:

JUDAH BEST, ESQ.
DeBevoise & Plimpton
Attorneys at Law
555 13th Street, N.W., Suite 110 E
Washington, D.C. 20004

Mr. WILSON. Good morning. On behalf of the Committee on Government Reform and Oversight, I appreciate and thank you very much for coming here today.

This proceeding is known as a deposition. The person transcribing this proceeding is a House reporter and notary public. I will now request that the reporter place you under oath.

THEREUPON, ERIC SILDON, a witness, was called for examination, and after having been first duly sworn, was examined and testified as follows:

Mr. WILSON. I would like to note for the record that those who are present at the beginning of this deposition are James Wilson, the designated Majority Counsel for the committee. I am accompanied by Miki White and Maria Wusinich, who are both with the Majority staff.

Christopher Lu is the designated Minority counsel for the committee, and the deponent is represented by Mr. Judah Best.

Although this proceeding is being held in a somewhat informal atmosphere, because you have been placed under oath, your testimony here today has the same force and effect as if you were testifying before the committee or in a courtroom.

If I ask you about conversations you have had in the past and you are unable to recall the exact words in the conversation, you may state that you are unable to recall those exact words, and then you may give me the gist or substance of any such conversation to the best of your recollection.

If you recall only a part of the conversation or only part of an event, please give me your best recollection of those events or parts of conversations that you recall.

If I ask you whether you have any information upon a particular subject and you have overheard other persons conversing with each other regarding it or have seen correspondence or documentation regarding it, please tell me that you do have such information and indicate the source, either a conversation or documentation or otherwise, from which you derived such knowledge.

Before I begin the questioning, I want to give you some background about the investigation and your appearance here.

Pursuant to its authority under House Rules 10 and 11 of the House of Representatives, the committee is engaged in a wide-ranging review of possible political fundraising improprieties and possible violations of law. Pages 2 through 4 of House Report 105–139, a copy of which you have received, summarizes the investigation as of June 19, 1997, and encompasses any new matters which arise directly or indirectly in the course of the investigation.

Also, pages 4 through 11 of the report explain the background of the investigation. All questions related either directly or indirectly to these issues or questions which have the tendency to make the existence of a pertinent fact more or less probable than it would be without the evidence, are proper.

The committee has been granted specific authorization to conduct this deposition pursuant to House Resolution 167, which passed the full House on June 20, 1997. Committee Rule 20, of which you have received a copy, outlines the ground rules for the deposition.

Majority and Minority counsel will ask you questions regarding the subject of this investigation. Minority counsel will ask questions after Majority counsel has finished.

After the Minority counsel has completed questioning you, a new round of questioning may begin. Members of Congress who wish to ask questions will be afforded an immediate opportunity to ask their questions. When they are finished, committee counsel will resume questioning.

Pursuant to the committee's rules, you are allowed to have an attorney present to advise you of your rights. Any objection raised during the course of the deposition shall be stated for the record. If the witness is instructed not to answer a question or otherwise refuses to answer a question, Majority and Minority counsel will confer to determine whether the objection is proper.

If Majority and Minority counsels agree that a question is proper, the witness will be asked to answer the question. If an objection is not withdrawn, the Chairman or a Member designated by the Chairman may decide whether the objection is proper.

The deposition will be held open subject to rescheduling for the purpose of resolving any disputed issue.

This deposition is considered as taken in executive session of the committee, which means it may not be made public without the consent of the committee, pursuant to clause 2(k)(7) of House Rule XI.

You are asked to abide by the Rules of the House and not discuss with anyone, other than your attorney, this deposition and the issues and questions raised during this proceeding.

Finally, no later than 5 days after your testimony is transcribed and you have been notified that your transcript is available, you may submit suggested changes to the Chairman. The transcript will be available for your review at the committee offices. Committee staff may make any typographical and technical changes requested by you.

Substantive changes, modifications, clarifications or amendments to the deposition transcript submitted by you must be accompanied by a letter requesting the changes and a statement of your reasons for each proposed change.

A letter requesting any substantive changes, modifications, clarifications or amendments must be signed by you. Any substantive changes, modifications, clarifications or amendments shall be included as an appendix to the transcript, conditioned upon your signing of the transcript.

Do you understand everything we have gone over so far?

The WITNESS. I do.

The WILSON. Do you have any questions about anything we have gone over so far?

The WITNESS. No.

Mr. WILSON. I am prepared to begin asking some preliminary questions. Do you have any initial comments?

Mr. LU. No, not at this time.

Mr. WILSON. I will be asking you questions concerning the subject matter of this investigation. Do you understand?

The WITNESS. Yes.

Mr. WILSON. If you don't understand a question, please say so and I will repeat it or rephrase it so that you do understand the question. Do you understand that you should tell me if you do not understand the question?

The WITNESS. I do understand.

Mr. WILSON. The reporter will be taking down everything we say and will make a written record of the deposition. Please give verbal, audible answers in that the reporter cannot record what a nod of the head or a gesture means.

Do you understand that you should give audible answers?

The WITNESS. Yes.

Mr. WILSON. If you can't hear me, please say so and I will repeat the question or have the court reporter read the question to you. Do you understand?

The WITNESS. Yes.

Mr. WILSON. Please wait until I finish each question before answering, and I will wait until you finish your answer before I begin the next question.

Do you understand that this will help the reporter make a clear record because she cannot take down what we are both saying at the same time?

The WITNESS. Absolutely.

Mr. WILSON. Your testimony is being taken under oath, as if we were in court, and that if you answer a question, it will be assumed that you understood the question and the answer was intended to be responsive to it.

Do you understand that?

The WITNESS. Yes.

Mr. WILSON. Are you here voluntarily or are you here as a result of a subpoena?

Mr. BEST. He is here voluntarily.

Mr. WILSON. Do you have any questions about the deposition before we begin the substantive portion of the proceeding?

The WITNESS. Not based on what you have said so far.

Mr. WILSON. Okay.

EXAMINATION BY MR. WILSON:

Question. Please state your full name and spell it for the record?

Answer. My name is Eric, E-R-I-C, Kasle, K-A-S-L-E, Sildon, S-I-L-D-O-N.

Question. Have you used or gone by any other names?

Answer. No.

Question. Have you been known to others by any other names?

Answer. No.

Question. What is your date of birth and Social Security number?

Mr. LU. Counsel, let me interrupt you a second. I am not sure why you need Mr. Sildon's Social Security number or frankly, for that matter, any witness' Social Security number.

The WILSON. Verification for information we might receive.

Mr. LU. Could you make some kind of proffer as to what type of information that would be? I would understand if Mr. Sildon was a target of this investigation, but he is not. And as you know, once you have obtained somebody's Social Security number you can, you know, run all kinds of credit reports and, you know, other invasive types of searches on him.

The WILSON. I am actually not sure whether I can run any credit reports or invasive searches with a Social Security number, but to the extent that it is an identification of materials and business, I ask for it. It is a common thing in depositions and I never heard you object to it before.

Mr. LU. Is this—do you intend to ask for this for all witnesses?

The WILSON. I may and I may not. But I would ask, counsel, Mr. Best, are you instructing your client?

Mr. BEST. No, I am just speaking to him.

The WILSON. I apologize for that. Are you instructing him not to answer my question about his Social Security number?

Mr. BEST. I am interested to hear this colloquy. Do you intend to check his credit references?

The WILSON. I do not. I do not intend to check credit references.

Mr. BEST. Do you intend to use his Social Security number in some fashion?

The WILSON. I don't know.

Mr. BEST. What would you do if you did?

The WILSON. To the extent that it might be an internal identification device, it might be relevant.

Mr. LU. I am not sure I understand. I mean, is there any sense that there is another Eric Sildon out there that you might need to verify that this is the actual one who might appear on a document?

The WILSON. Not at this point, no.

Mr. LU. Well, I am not sure I have heard a sufficient reason, but I am going to object to the question. I am going to leave it up to Mr. Sildon as to whether he wants to answer it or not, that part of the question.

The WITNESS. Well, I——

Mr. BEST. One second.

[Witness conferring with counsel.]

Mr. BEST. Mr. Sildon has expressed a concern with regard to the answers regarding the potential use of his Social Security information, and at this point would prefer not to divulge that information.

The WILSON. Are you instructing your client not to answer the question?

Mr. BEST. I never instruct a client. I just recommend to him and it is the client that makes a determination based on that. I recommend that he not answer the question.

The WILSON. I am prepared to go on in that I am satisfied to have the deposition left open pending resolution of this matter, if I decide to continue, which I may or may not.

The WITNESS. That's fine.

EXAMINATION BY MR. WILSON:

Question. What is your current address?
Answer. I live at [redacted].
Question. How long have you lived at that address?
Answer. [Redacted].
Question. Have you lived outside of the United States?
Answer. No.
Question. Did you attend college?
Answer. Yes.
Question. Where did you attend college and what degree did you receive, if any?
Answer. I graduated from [redacted] with a Bachelor of Science in business administration.
Question. When did you graduate?
Answer. [Redacted].
Question. Do you have any post graduate degrees?
Answer. No.
Question. Please briefly describe your employment history after college.
Answer. I came to Washington, D.C. in the fall of 1985 and worked as a paid intern for Congressman Alan Wheat, then- Congressman Alan Wheat, while I was looking for a more permanent position. I was hired in late December, 1985 and began work on January 2nd, 1986, for then Congressman Dan Glickman. I worked for Congressman Glickman until March of 1992. I left Congressman Glickman's office to be a legislative representative for the National Federation of Independent Business. I was with NFIB until the fall of 1992, when I went to work for the Presidential Inaugural Committee to work on the 52nd Presidential Inaugural.
Mr. BEST. That would not have been the fall of 1992, would it?
The WITNESS. That is correct. It was in November of 1992. After the inauguration, I was offered and accepted employment at the Democratic National Committee, where I worked until September of 1995. I left the DNC in 1995 and went to work for the Democratic Governors Association. I worked at the DGA until the 53rd Presidential Inaugural when I was asked to come back and help produce an event. I was at—after the Inaugural Committee, I have worked a succession of political and event-resulting jobs, basically working for myself as a consultant with a series of clients that I have represented.

EXAMINATION BY MR. WILSON:

Question. Could you please provide an approximate month date for your tenure at the DGA?
Answer. Sure. September 1995 is when I was hired. I actually may have begun work in early October there, but right around the first of October, end of September, and I was at the DGA until early December 1996.
Question. Did you review any documents in preparation for this deposition?
Answer. Just a few documents.
Question. Where did you review these documents?
Answer. At the office of my counsel.
Question. Do you keep work-related files in your personal residence?
Answer. No.
Question. Do you have any papers from your time at the DNC at your personal residence?
Answer. No. And I have made a search to confirm that, and I do not have any documents.
Question. Who approached you formally about taking your position at the DNC?
Answer. A woman named Nancy Jacobson contacted me.
Question. And who is Nancy Jacobson?
Answer. At the time, Nancy was—Nancy had been placed as the National Finance Director for the DNC and I knew Nancy from my days working on Capitol Hill. She had been a fund-raiser for one of the Members of Congress, and I had worked for a reelection of his.
Question. And did you receive any recommendations to work at the DNC?
Answer. I am not sure I understand your question.
Question. Did any—apart from speaking with Ms. Jacobson, did anybody recommend you for the job or a job at the DNC?
Answer. Sure, Nancy—I am sure Nancy called my references.
Mr. BEST. Do you know that for a fact?
The WITNESS. I do not know that for a fact.

EXAMINATION BY MR. WILSON:

Question. Do you know if anybody submitted a written recommendation on your behalf?

Answer. I do not know if anybody had submitted a written recommendation.

Question. Did you interview with anybody prior to being offered the job at the DNC?

Answer. Other than Nancy?

Question. Well, in addition to.

Answer. Nancy Jacobson asked me to come in and talk to her about the position and talk to her about my experiences, and also talk to her Deputy Finance Director, a woman named Hannah Spillman, I believe, and just my conversations with them.

Question. Do you recall interviewing with anybody else?

Answer. I don't recall if I interviewed with anybody else.

Question. What were your job responsibilities at the DNC?

Answer. Would you like all my responsibilities?

Question. Yes.

Answer. From day one on?

Question. If you could provide a general overview.

Mr. BEST. He had different positions.

The WILSON. I understand that.

EXAMINATION BY MR. WILSON:

Question. If you could break down your different positions and overview of your responsibilities?

Answer. I worked on the fund-raising staff from 199—from early 1993, early February 1993, until, I would say, early 1994. I then left the finance staff and went to work in the office of the chairman where I worked until I left the DNC in 1995.

Question. What were your—what were your job titles?

Answer. In the Finance Division, my job title was Regional Finance Director. When I moved to the chairman's office, my title was Director of National Membership Services.

Question. Did you replace anybody in the position of Director of National Membership Services?

Answer. No. It was a new—newly created office.

Question. Who did you report to in your first job as Regional Finance Director?

Answer. I reported to Nancy.

Question. And who did she report to?

Answer. I am sorry. Who did Nancy report to?

Question. Correct.

Answer. I don't know the hierarchy structure of who she directly reported to.

Question. I think you stated before that—I am just wanting to clarify for myself. She was the National Finance Director at the time?

Answer. Correct.

Question. And in your position as Director of the National Membership Services, to whom did you report?

Answer. I reported initially to Martha Phipps who was, I believe she was Deputy Chief of Staff, but more specifically she was, and I am not certain what her exact title was, but she essentially ran the office of the chairman's office.

Question. You said initially you reported to her. After Martha Phipps, did you report to somebody else?

Answer. I did. Martha left the DNC at some point in late 1994, I believe, or perhaps early 1995—I am not certain of the date—but when she left, she left around the same time that a new chairman came to the DNC and he brought with her a staff woman named Carole Khare, I think it is K-H-A-R-E.

Question. In your position as Regional Finance Director, and I will—once we finish this, I will try not to jump back and forth so much——

Answer. Okay.

Question [continuing]. Did you have any subordinate employees?

Answer. I did. Well, as—I should actually restate that. I didn't have subordinates who necessarily reported directly to me on a full-time basis. However, when I would go out and work on an event, there would always be a lead on the event and a few other staff people, and I was always an event lead—I shouldn't say "always." When I was an event lead, there were other staff people working on the event who would report to me about that event as a—in developing kind of a hierarchy tree of who reported to who, there was no one underneath me per se whose responsibility was to report to me on a full-time basis.

Question. When you were working with colleagues in your position as Regional Planning Director, who were you working with? What were the names of the people that you were working with?

Answer. Well, first of all, generally it was a rather small staff so we all would be working with each other. But on specific events, I worked with Sam Newman and Jay Dunn and Peter O'Keefe, and I believe on one event I worked with Erica Payne.

Question. Do you recall any other individuals that you worked with at that time, and I am asking for your immediate office?

Answer. I want to make sure that I understand what you are asking. Are you talking about for these specific events or are you talking about my day-to-day responsibilities as part of the Finance Committee?

Question. In your daily responsibilities on the Finance Committee.

Answer. Without trying to be too vague, I worked with everyone on the staff. It is a small staff. Just as, for example, you may be working with lots of people on the committee staff, you come in contact with them or you have a conversation with them. I mean, you know, we were a staff of, I don't know, approximately 15, 20, 25 people, in a space no larger than this room. So we would see each other every morning or have, you know, a staff meeting a couple times a week. Somebody would call in and you would happen to answer the phone and somebody would be on the other line.

Question. In your position as Director of the National Membership Services, who else worked in the office of National Membership Services?

Answer. For a period of time, Jay Dunn, who I had previously mentioned was the Deputy Director of the program, and after—after a period of time, Jay left the program—you have to understand, the program left the Finance Division and Jay was really more interested in doing finance than staying necessarily with this program. And so he went back over to the Finance Division and a new deputy was assigned to me, and her name was Brook Stroud.

Additionally, another woman came on board at the DNC and she was assigned to the program as well. Her name was Susan Lavine.

Was National Membership Services originally a part of the Finance Division?

Answer. Yes. National Membership Services initially was—the answer is, yes.

Question. Could you explain the chronology or how—where National Membership Services was located in the DNC flowchart when you arrived at the DNC, and then until the time you departed from the DNC?

Answer. National Membership Services did not exist when I arrived at the DNC. The program was created initially in the Finance Department because that's where I worked, and it was created in early 1996, because I was still fund-raising around the country in 1995. It was created in early 1996 and within a matter——

Question. If I could?

Answer. I am sorry. In 1993 I was fund-raising around the country. In early 1994, as I best recall, the program was created in the Finance Division, primarily in response to the fact that I was tired of being out on the road and I worked for Nancy in the Finance Division and she wanted me to stay on board and I had expressed an interest in doing more constituent types of work, but almost immediately, within I would say 8 to 12 weeks, approximately 8 to 12 weeks, it was moved from Finance to a broader location within the DNC so that it truly could provide services to all the members of the DNC, not just people on the Finance staff or contributors of the DNC.

So sometime in early 1994, maybe the spring of 1994, it was moved out of Finance and into the Chairman's office.

Question. When this move, presuming there were discussions about this move, who took part in discussions to move the NMS from Finance Division?

Answer. Initially, I had those discussions with Nancy. Again, I had—she was my superior. I had an interest in not traveling as much as I had been traveling as a regional finance person; spoke with her. She said, well, I would like to keep you on board. You know, I think you are an asset to the organization.

After speaking with her, because obviously we were at some point in time, when we were interested in—when I was interested in moving it out of the finance division, then we talked to the Chairman's office and probably the Chairman himself and certainly Martha Phipps about the idea of bringing the program to a broader position at the DNC.

Question. Who did you speak with in the Chairman's office?

Answer. Martha Phipps, as I recall, was the initial contact. I really don't recall if I talked to Chairman Wilhelm about it or not or if Martha did. But I know a discussion was had within the Chairman's office about, this is a new area; where is

the most appropriate place for it. And a decision was made that their office would be the best place.

Question. Where physically was NMS located compared to the Chairman's office in the DNC?

Answer. Down the hall—the Chairman's office, his personal office, was at one corner of the building and there was a hallway leading to it and you passed a series of secretarial kinds of cubicles and at almost a semicircle around his office in the corner were a variety of other offices of people who reported to the Chairman, and I was in one of those offices.

I was essentially four offices away from the Chairman's office.

Question. In your position at the NMS, did you type your own letters and memoranda?

Answer. Occasionally.

Question. If——

Answer. I did not have a secretary per se, but I—you know, there were—I had obviously staff, as I have mentioned previously, who worked for me and occasionally they would type a memo putting their name and my name on the memo, or my name on the memo, to someone.

Question. Did anyone, other than Jay Dunn, Brook Stroud or Susan Lavine prepare written typed materials for you?

Answer. Not that I am aware of. You mean with my name on it, in other words?

Question. Correct.

Answer. From me or authored by me?

Question. Correct.

Answer. Not that I am aware of.

Question. Did you fax your own material?

Answer. Again, often I would fax my own material. Again, I did not have a secretary working for me, and I tried not to have those other people treated as assistants to me. So I did my own faxing, typed my own memos, but occasionally somebody would be going to the fax machine, and I would say can you do me a favor, fax this. Or they would do a memo in my name, show it to me or verbally say, this is what we—you know, this is what he said. I am going to send this fax to whoever. I would say, that's fine.

Question. Did you use e-mail in your position as Director of the NMS?

Answer. Internal e-mail within the DNC, I did. I actually did not send e-mail outside of the DNC.

Question. In your position in the fund-raising aspect, as Regional Finance Director, did you have contact with White House employees?

Mr. LU. You mean in his professional capacity as opposed to a personal capacity outside the office or something like that?

Mr. WILSON. In his position as Regional Director.

The WITNESS. Yes. As I recall, I had occasional conversations, frankly not too many because issues—you know, I am in a location, be it Miami or Philadelphia or Minneapolis doing what I am doing. The answer is, yes, to your question.

Question. Who did you speak with on the White House staff?

Answer. Oh, I would talk to people in the Vice President's office because he was a principal coming to a fund-raising event and we needed to coordinate schedules, arrival time, the hotel logistics, movements, things like that. So I don't recall specifically who on his staff 4 or 5 years ago I spoke to about that, but I would talk to that person.

I mean, candidly, I don't recall the specific people 5 years ago that I talked to. I just know that there was need to have contact with the White House dealing with logistical aspects of the events that we were preparing. At the time, early at the DNC, when we had a fairly small staff, we didn't have an events staff as they then started to put into place a year or two later.

So it was up to the fund-raisers to deal with some of the logistics. It also was up to the people in Washington. So very often I talked to Nancy Jacobson or her deputy, Hannah, or people who were back here in D.C. to say here are a variety of issues that we need to get answered in advance of the Vice President's arrival for an event.

Can you get us answers to these? Again, I don't specifically recall who I talked to, which conversations I may have had with the White House versus which ones I had at the DNC, but they were all primarily logistics-related conversations, as I recall.

Question. In your professional capacity as Director of the NMS, did you have contact with White House employees?

Answer. I did.

Question. And with whom would you—who would you contact at the White House?

Answer. Well, that's a fairly broad question. I can—I would be happy to tell you offices that I had contact with. I can try to recall specific individuals within these offices.

Question. Actually, to short-circuit, I will ask you questions about specific individuals later.

Answer. Okay.

Question. But if you could give me a broad sense of the offices that you would interact with.

Answer. I probably interacted most often with the Office of Political Affairs, because they were the ones that were deemed to be the appropriate source of some of the issues that we were discussing. I also dealt with the White House Photo Office, the Office of Correspondence, the Office of Public Liaison. You know, again, in my professional capacity, that certainly is a good indication of the majority of the places that I contacted.

I had, of course, over the years developed friendships with people who happened to work in the White House and, you know, may have occasionally called them because I knew they were a pal and, you know, they could help get an answer for me to something or explain something that was going on that I was, you know, hearing about on television. I would say primarily those four offices are most directly—also the Office of Scheduling and Advance.

Question. Were you the primary person in your office to either contact or be contacted by the White House?

Answer. While I was the primary person, again, as I mentioned previously, I like to empower people and allow people to grow in their jobs. I wasn't looking to have a bunch of assistants with me. So everyone on our staff had a relationship with people at the White House. So not only did I call political affairs, but I know Brook also would call political affairs, and I know Susan would call political affairs and, frankly, they may have called—they had their own contacts as well.

Question. Did your colleagues have areas of particular responsibility or expertise that would have them interacting more or less constantly with anybody at the White House?

Answer. Well, the—of all of us, the only person who had specific responsibilities was Susan Lavine because she was responsible for conducting tours of the White House on behalf of supporters, political supporters or what have you.

That was primarily her sole responsibility. She may have had other areas where she assisted, but if a tour request came in, it went to Susan. If any other kind of request came in, Brook and I would figure out who had what on their plate, who might be too busy to handle a specific request. We would just kind of assign that out accordingly.

Question. Did you ever attend meetings at the White House?

Answer. Yes.

Question. Did you attend regular—aside from meeting about a particular individual, did you attend regularly scheduled meetings?

Answer. Yes.

Question. And what were those meetings?

Answer. Initially, I was able to attend a daily scheduling meeting that occurred in the morning that was run by the President's Scheduling and Advance Office. But this was not a meeting where decisions were made as much as a meeting where the President's schedule, frankly which was a public schedule, was disseminated just a few extra days in advance. So on a Monday they might discuss that whole week's schedule and that meeting was attended by lots of offices within the White House.

I think there were even other outside people who were not permanent White House staff that were able to attend this meeting to understand where the President might be traveling to or the kinds of big public events that he would be doing. In fact, there would be lots of discussion where the President will have private time from this and they would not discuss what was going on in the private times.

So this was discussions about we are going to have a big event on the south lawn and a thousand people are coming for this event and then tomorrow the President is traveling to this location and that location. And I attended that—I was allowed to attend it on a regular basis. I did not actually travel over to the White House every day to attend the meeting, but a couple of times a week I would attend that meeting.

Then there was a series of meetings in—I don't remember—I don't recall if it began in 1994 or early 1995, but at some point there was a series of regularly scheduled meetings dealing with upcoming events at the White House. It was a chance, again, for all the different departments within the White House, as well as some outside organizations, to come and hear about—a little less about the minutia of the

scheduling, a little bit more about there is an event 2 weeks from Wednesday and there is a dinner 3 weeks from Friday, for a broad discussion about upcoming public events, not private scheduled events.

Question. Just asking a quick question about the previous category, you discussed the scheduling events. Were those daily meetings?

Answer. As I understand, those meetings were held daily. There may have been days when they were cancelled, but it was known that at a certain time every day in a certain room, there was a meeting hosted by the scheduling—Office of Scheduling and Advance, primarily the scheduling staff, to discuss the President's upcoming immediate schedule in the upcoming—immediate meaning the next week.

Question. Who—for the immediate, who chaired the meetings?

Answer. They were run by the scheduling staff. The Director of Scheduling was never in those meetings. They were run by various members so on a particular Monday it might have been run by one person. I recall Stephanie Streett, for example, would run a meeting and then on another day a different person might have run the meeting. Just I think—I don't know how their office decided who would run the meeting.

Question. And the second category of meetings you were describing, the meetings about impending events at the White House, were they regularly held meetings? For example, weekly or monthly?

Answer. They would be held weekly or every couple of weeks. It was usually decided at the previous meeting, okay, we will next meet at. So in that sense, there was a scheduled time for a future meeting. It wasn't necessarily every Tuesday or Thursday at 3:00 or every other Monday. It was just agreed upon when the next time a meeting needed to be held.

Question. Were there any other recurring types of meetings that you attended at the White House?

Answer. No—well, in 1994, I attended meetings in the Office of Correspondence, just on one special project, and that was the White House Christmas card project. And we did meet weekly for a period of maybe 3 to 4 months.

Question. Did you have a pass to gain access to the White House?

Answer. I did not have a hard pass which had my picture on it, which allowed me into the White House.

Question. Did you have any type of pass?

Answer. I did have a security clearance to allow me to present my driver's license to a Secret Service desk once you enter the White House, which would then be run through the system where I had—where I was on what was called an access list and they would then present me with essentially a temporary pass that I wore while I was in the White House and returned when I left the White House.

Question. Did you ever receive any type of background check for that pass?

Answer. Yes.

Question. And who conducted the background check?

Answer. As I understand, the FBI conducts that background check. I was interviewed by an FBI agent to get my information. I know that people such as former employers or people at my university were contacted by the FBI. I don't know if other law enforcement organizations were involved in that background check.

Question. Do you know of any other DNC employees that had—I shouldn't say any other because you told me you didn't have a hard pass, but do you know of any DNC employees that had a hard pass to get into the White House?

Mr. LU. You mean all employees at the DNC?

Mr. WILSON. Correct.

The WITNESS. I know that Susan Lavine, while she was working with me for a period of time, had a hard pass with her photo on it. She had previously worked at the White House. Candidly, I wasn't sure what the arrangement was, but she had it and seemed to be able to use it. I don't know anyone else who had a hard pass with their photo on it.

EXAMINATION BY MR. WILSON:

Question. Did Susan Lavine have a hard pass for the entire time you worked at the DNC?

Answer. I don't recall. She certainly had a hard pass when she began at the DNC and she certainly had a hard pass at least 6 months into her job at the DNC, but it had to be reviewed at—I don't know if the White House renews their passes on some regular basis, and I am not certain if her hard pass was reviewed. It is not something you wear around the DNC. You don't keep your White House hard pass hanging around your neck. So I don't know at what point—she may have, she may not. I just don't know.

Question. And did you ever discuss with Susan Lavine, Lavine, where she had the hard pass?

Answer. I generally recall having conversations with Susan, since she was conducting tours, and helping with tour aspects, you know, this hard pass and how great it must be to have a hard pass and be able to have the ability to give these tours. You know, you have to understand what we were trying to do in the national membership service was be responsive to requests, just as when I worked on Capitol Hill. Constituents would call and they would want a tour of the—or they would want a tour of the Capitol and it was nice to be able to provide that tour. Susan had that ability at the White House.

So in that sense, I recall—generally recall discussing with her how she got the pass, and she had explained that she had worked for Mack McLarty, who was at one point the Chief of Staff to the President. She had worked in his office and had the hard pass and when she came over to the DNC, I did not know her prior to her arriving. I did not hire Susan. She came with a hard pass and I assumed she was supposed to have it.

Question. Did any of your DNC colleagues ever ask you about why she had such a pass?

Answer. I don't recall if they asked me why she had such a pass.

Question. It is my understanding that a significant part of your job was handling requests made by financial contributors or donors to the DNC. Is that correct?

Answer. I would not characterize it that way. I would say that a significant part of my job was to handle requests provided to me from all departments within the DNC, be it political affairs, the Office of State Chairs, the Communications Department, the Finance Department.

Question. When a request was made of you that involved an individual, for example, for a tour or for some type of event, did you have sort of a standard operating procedure for how to handle that request?

Answer. Well, for tours we had a standard procedure. I would pass the request along to Susan and she would—you know, we had a specific number of tour tickets each week. Just as when I worked on Capitol Hill, as all Members of Congress get a small allotment of tickets they can provide to constituents, the DNC also got a small allotment of tickets that we could provide to our constituents. So if a tour request came in, in that sense, yes, there was some kind of a regular logistical practice of taking requests and moving it. For all other kinds of requests, it really was an issue of what is the request, how do we best handle the request, and there was not a specific practice.

Question. Did you ever do any background check or analysis of any individuals that were mentioned in requests?

Answer. I did not, but part of that—part of the reason for that was because it really wasn't my responsibility, and I do not say that somehow to sound like I did not want to take responsibility. If someone came to me with a request, I trusted that they vetted it. If they thought it was so important that this person got some of our limited tickets to take a White House tour or attend an event that was occurring at the White House, they must feel that that person is important enough to them that they know that person well enough that they have done the background information they need to do that they are confident that they can submit it to me for me to provide that name to the White House or try to resolve the request.

Mr. LU. Mr. Sildon, when you just said someone, were you referring to another office in the DNC, when another office provided you with a name?

The WITNESS. Correct. When another office, such as the Office of Political Affairs, had a specific request, I trusted that they did whatever background check needed to be done, that they vetted whatever information needed to be vetted and they provided it to me.

My role in our office, in membership service, was really to be the office that tried to do the physical work to get things accomplished. We didn't—I didn't meet with contributors in long meetings and then go and try to arrange things for them. I did not meet with people who might be a State chair or a strong political supporter out in the country. The request came—I basically dealt with DNC staff. So they would come to me with requests, "they" meaning various DNC staff members. I would try to resolve that request for them, figuring they had done whatever appropriate background needed to be checked to determine that it was appropriate to submit the request to me.

Mr. WILSON. Mr. Lu, to the extent that I ask egregiously unclear questions, I have never objected to people clarifying them, but you will have an opportunity to ask questions later and would it be appropriate to leave your questions for your round?

Mr. LU. Well, I like to think that was a clarifying question that actually helped the answer. Obviously, I will keep my questions to a minimum, but I think I am

perfectly entitled to clarify the record. I think in this instance, actually, it actually helped.

EXAMINATION BY MR. WILSON:

Question. Do you recall whether there were any instances where you did express concern over a particular request made of you and called somebody back to ask questions of them about an individual involved in a request?

Mr. BEST. You are asking him about where he had a concern about an individual or about the particular kind of request?

Mr. WILSON. About the individual.

The WITNESS. Could you repeat the question?

EXAMINATION BY MR. WILSON:

Question. Were there any instances where a request was made of you for something and it involved an individual and you were—had concerns or wanted some clarifying information about the individual? I am not asking about what their Social Security was or for a White House tour or something, but any type of substantive concern about the individual, whether you, yourself, wanted to pass that individual along down the food chain.

Answer. Not that I recall on specific requests.

Again, many of these people I did not even know who they were. Their names were provided to me by a department within the DNC and as I previously stated, I trusted that that department did whatever vetting they needed to do so that they were comfortable to provide the name to me.

As I said, I knew very few of these people and, therefore, would not have had any concerns about any of these people. They were just another name to me.

Question. Was there a system within your office to keep track of requests made of National Membership Services?

Answer. Initially, we had—we, being Jay Dunn and I, when Jay was the deputy, we set up kind of a spreadsheet where we tried to list individuals' names and what we might have been able to help them accomplish, just to—I did not want to get the same person on a White House tour eight different times for all of their friends.

At some point, you say, look, on November 22nd and sometime in December and sometime in January we have gotten you tours. I am just not going to help you this month. That was the only time that we actually had some kind of tracking system like that.

Examination by the time the program moved over to the chairman's office, as I indicated, which was only a few months after the start of the program, the process of tracking really was that we simply tried to keep files with contributors' names on it, just so we didn't throw out the paper and we knew who we had previously helped on certain projects.

Mr. BEST. You indicated, in answer to Mr. Wilson's question, that you kept files on contributors. Did you only keep files on contributors?

The WITNESS. Actually, no. We kept files on any individual that we tried to help with a request. Really, any request that came to me, regardless of what department it came from, I would simply start another file in the drawer so we had a reference of maybe a letter that they had sent or a thank you note or, you know, background information.

EXAMINATION BY MR. WILSON:

Question. Was there a standard method of making requests of your office? Did people use a form or did you require people to submit something to you?

Answer. I required DNC staff—"required" is a strong word. I asked DNC staff to try to fill out a form that we had created that basically provided the supporter's name and address and a phone number and a fax number, in case we ever needed to deal directly with them. And there were occasions when I did deal directly with these people either to get follow-up information or to, you know, get a piece of information back to them.

And so I asked staff to try to provide me with all the kind of logistical background.

Question. Did you provide these forms to the other offices of the DNC?

Answer. We created a general form and kept it in the office. If you want a White House tour, there is a tour form to fill out, the date you would like the tour and all available dates and is there a local phone number. I believe we had a form for general requests, you know, nature of the request, background, information that we would need to know, again, you know, pertinent logistic kinds of information; name and address information.

Question. Were these hard copy forms, forms on paper that you would actually distribute to the offices?

Answer. Uh-huh.

Mr. BEST. You have to answer, yes, to that. You went "uh-huh." You two have begun a discussion rather than a question and answer.

The WITNESS. I am sorry. Okay. Yes, there were forms on paper. Initially, late in my tenure with the program, I tried to create a form on the internal e-mail so that anybody could log into the database and get the form and type it at their desk and not have to come down to my office and fill out a form.

It was not used very widely among DNC staff.

EXAMINATION BY MR. WILSON:

Question. Were the hard copy paper forms used fairly widely?

Answer. We asked them to. There were people who just—they were too busy to fill out the paper. But, yes, we asked them to fill—I would say a majority of the time, a request came with some kind of paper documentation.

Question. And if there was no paper request, how would they make the request?

Answer. They might stop by my office. They might—again, I shared an office with Susan and Brook, so they might poke their head in the office and talk to one of my colleagues, who might verbally pass it on to me or they might stop in the office and deal directly with Susan, because people at the DNC knew that she was conducting the tours and handling the kind of hospitality aspect.

Mr. WILSON. I am showing the witness a document, which is—it is a copy of a check with information about a contributor underneath.

EXAMINATION BY MR. WILSON:

Question. And there is a notation on the side that says, "in," and I think it is "AS–400." And I am wondering, what is—what does the AS–400 refer to on this form?

Answer. First of all, I want to be clear, this is not my document or my form. Since we just had a discussion about forms, I want to make sure that—this is not a form that I have ever seen before.

But to answer your question, AS–400 was the internal DNC database. That was the name of the complete database, but not everyone at the DNC had access to every aspect of the DNC database. You had to have a password and so, for example, people in—in Political Affairs, I don't believe, could just get on to AS–400 and get access on a contributor's background information.

Mr. BEST. Let me also state that this document that you have shown the witness bears dates on it in 1996, a period well after his termination, his conclusion of his service at the DNC.

EXAMINATION BY MR. WILSON:

Question. Did your office have access to the AS–400 system?

Answer. Generally, our office had access to the AS–400 system. I never—first of all, I didn't have a password. Once I left the Finance Division in early 1994, I did not have a password and I actually did not use the AS–400 system for probably the last year and a half of my employment at the DNC.

We had access to AS–400 and my staff may have used it because, again, that was the complete database. If you just needed to get a name and address for, you know, a political supporter from back in the Midwest from 5 years ago, that's where you would find their name and address. And as I understand the AS–400 was also used by, for example, the direct marketing people, who were receiving thousands of correspondence from around the country.

Question. Was a password required to access it?

Answer. You had to have a password to get on to AS–400. As I understand, that password only gave you access to certain accounts. As I recall, that's how it worked. So certain staffs had access to certain information. Other staffs to other information.

Question. Did you regularly—and when I say regularly, I am not asking if you called somebody up and said, could you give me some information on so and so—but did you regularly receive material that was produced by the AS–400 system?

Answer. I never received information that was produced by the AS–400 system, other than perhaps trying to track down a name or address. But I never ever received any kind of printed information from AS–400. There were not regular reports, at least that I saw. There aren't regular reports.

Question. Are you referring now to your time as Director at NMS?

Answer. Correct.

Question. Did you receive AS–400 material when you were in your position as Regional Finance Director?

Answer. Yes.

Mr. BEST. When you say AS–400 material, you mean computerized data derived from the AS–400?

Mr. WILSON. Correct.

The WITNESS. The AS–400, like any spreadsheet—like any data system, can provide information in any manner you want it provided. So, for example, when I was on my way to Miami, Florida, to run a fund-raiser, I would want to get the list of names of past DNC supporters who lived in Florida or lived in the region.

So in that sense, I could go into AS–400 and call up everyone in the State of Florida who had supported the DNC since year X, whatever X is, and I could get a printout of those names or names and addresses or just phone numbers, just like any kind of data search.

But, again, that was while I was part of the Finance Committee, doing fund-raising in specific cities.

When I stopped—when my role as a fund-raiser ended, and I became Director of National Membership Services, I did not have an account at AS–400, with AS–400, because I didn't need it. It wasn't part of my role to get any kind of background. It was up to the staff to give me name and address and I didn't need any other background information.

Mr. LU. Counsel, could I interpret, whenever we reach a good stopping point, can we take a break?

Mr. WILSON. Absolutely.

The WITNESS. At some point, I would like to take a break, if you think there is a natural break point, I would appreciate that.

Mr. WILSON. If we can go off the record now, that would be acceptable.

[Recess.]

Mr. WILSON. Are we ready to go back on the record?

Mr. LU. Absolutely.

EXAMINATION BY MR. WILSON:

Question. In your—when you were Director of NMS, did you receive contribution records of individual donors?

Answer. No.

Question. Generally, were there limited spaces available for tours or other types of visits to administration buildings that you would arrange for people to go on?

Mr. BEST. I am not sure I understand.

Mr. LU. I am not sure I understand that. Do you mean the public tours? And I am also not sure what you mean by administration building.

EXAMINATION BY MR. WILSON:

Question. Administration building, buildings such as the Holocaust Museum or the White House or Old Executive Office Building, if people requested to have a tour of those types of things, was there generally limited availability for those types of tours?

Answer. There were a specific limited number of tickets that we were allowed to have for tours to the White House, the same "VIP," in quotes, tours at the same times that Members of Congress, Republicans and Democratics, also had access to; 8:15, 8:30, 8:45 in the morning. There were a limited number of tour tickets for that. There were not—we did not have any kind of regular allotment of tour tickets for any other site in the city.

Question. Who set the number for the tickets that you were provided access to?

Answer. Someone in——

Mr. BEST. You are talking about the tours now?

Mr. WILSON. Correct.

The WITNESS. Are you talking about tours for the White House?

EXAMINATION BY MR. WILSON:

Question. Yes.

Answer. Somebody in the White House visitors' office.

Question. How would you prioritize among multiple applicants? Do you have more requests for a particular tour than you had tickets available?

Answer. Yes.

Question. How would you determine between the requests?

Answer. Very often it was first-come, first-served, just as it used to be when I worked on Capitol Hill. Occasionally, we would maybe have a few remaining tickets left, you know, two or four of our allotment left and we would have on the same day a request for 10 different tickets and then we would try to figure out who

should get those tickets. But there was no particular way that we qualified who got those tickets.

Maybe somebody had tried a month before and didn't get them so we would provide them to that particular person the next time around. Or somebody who was traveling all the way from California and they were only going to be here for one day and that was the only day they could go and we happened to have two tickets for that day. So primarily it was first-come, first-served, though.

Question. Was the size of a financial contribution ever used to help make the determination?

Answer. Well, again I did not have access to the financial records and I think there were times when we knew that based on, you know, someone saying, look, I really would like to help this person get a tour, you know, they are—you know, they are strong supporters of the party, but I never knew specific dollar amounts, who gave what. Very often I wouldn't find that information out until I read it in the paper when the Post would do their quarterly list of contributors.

Question. When people used the request form that you provided to the various offices for making requests for tours, or whatever else the request forms were used for, was there a system for people to indicate how much they wanted you to be able to respond affirmatively?

Answer. Well, I provided a space for—I don't recall specifically what I called it, but, you know, additional information or background or something—whatever they wrote, they wrote. But I did not have a specific language that asked for a contribution level and, again, I want to remind you I was taking care of—or trying to help all departments within the DNC. So contributions were not the sole focus on what I was looking at.

I also would like to maybe state the obvious, which is while finance may have thought that their group of constituents was the most important, so did political and so did the Communications Department. Political didn't care how much money someone gave. They were more interested in the person who went out and put door hangers on 10,000 houses. To them that was important. So it did not matter to me how much money someone gave. I was just trying to be responsive to all the different staff people at the DNC who were trying to be responsive to all of their constituent bases around the country within their divisions.

Question. Did you ever receive instructions or any type of indication from the White House that somebody should be given priority to receive a particular type of—to be helped by your office?

Answer. Absolutely not.

Question. Did you ever have access to any computer databases of names of individuals generated by the DNC?

Answer. Well, as we talked about before, the AS–400 system was the database collection and repository for the whole DNC.

Question. I am asking you—you have indicated you didn't have a password. Was there any other type of database or repository that you used that gave you names of individuals?

Answer. Not that I recall.

Question. What do the terms "trustee"—and these are terms of art "trustee" and "managing trustee" mean?

Answer. Those were donor councils at the DNC.

Question. Specifically, do you recall what trustee category—what was required to be in the trustee category?

Answer. I don't recall because their requirements changed over the course of the years and, again, that wasn't relevant to my responsibilities.

Question. Do you recall what was required to be part of the managing trustee category?

Answer. Again, as I just stated, A, I was not a member of the Finance Division beyond 1993, and B, the amounts that were requested of members—or requested of supporters to become members of these donor councils was changing.

Question. Did you ever arrange for meetings between individuals who were referred to your office and White House staff?

Answer. I generally recall trying to make a connection between two people. I don't specifically recall who in the White House I might have asked to meet with someone, but, again, that would have only been because a DNC staffer would have come to me and said, I really need person X or can you help me get person X to meet with staff person X.

Mr. LU. Counsel, I am not sure if your question is looking at the—are we now focused strictly on the national membership's time as opposed to a specific fund-raiser?

Mr. WILSON. I am actually wanting to focus at this point on the National Membership Services.

Mr. BEST. His answer seems to be with regard to meetings with regard to DNC staff personnel and White House personnel. You used the word "individuals" and I am not sure what you meant by that.

Mr. WILSON. Right. And I will re-ask the question for clarity's sake.

Question. Did you ever receive names of non-DNC employees for suggested meetings with White House staff?

Answer. I don't specifically recall that occurring. It certainly may have, and if someone knew that perhaps I knew someone at the White House, a staff person might have got in touch with me on behalf of one of their constituents, again, be it the political division or the communications division.

Question. Do you recall whether the request forms that you circulated to the offices were ever used to make a request of your office that you facilitate or set up a meeting between a non-DNC employee and somebody in the White House?

Answer. It's possible. I don't specifically recall, but it certainly is possible.

Question. Do you recall whether there was anyone at the DNC who was in charge of facilitating meetings between non-DNC employees and administration officials?

Mr. BEST. Now we are going from meetings at the White House?

Mr. WILSON. I am asking again about the NMS staff.

Mr. BEST. You have now enlarged it from White House staff to administration officials?

Mr. WILSON. Correct. Correct.

The WITNESS. There were times when I was responsible for that. There also were a lot of people at the DNC who had relationships around town. They had worked with these people during campaigns or they knew them socially and also formed a professional relationship where they would just call them directly. So there were certainly times when I would make phone calls out into the administration. And as I previously indicated, it is certainly possible that I made phone calls to staff people at the White House on behalf of the DNC constituents who, as I indicated, could be from political or any other department, the chairman's office.

But that doesn't mean that I exclusively, I, meaning I or my staff, exclusively were the ones who made such contacts because there were all kinds of people out there who had their own relationships.

EXAMINATION BY MR. WILSON:

Question. Well, avoiding personal contacts where somebody might call a friend and attempt to get something done, was your office the office that people would turn to if they wanted to suggest that a non-DNC employee meet with a White House or an administration employee?

Answer. Even making the void which you just made, there is nothing which prohibited some, you know—not that—not that a staff person is a lone ranger, but nothing to prohibit some staff person from picking up the phone and calling an office around the administration. So while sometimes staff would come to me and help me to ask with an initial phone call, for all I know they were making their own phone calls and calling out to the administration themselves, or the White House to a staff person themselves.

Question. Understood. I am just trying to get a sense of whether that was one of the purposes or functions of the request forms that you circulated to other offices, was to be used for that type of purpose, if somebody wanted to use it for any purpose.

Answer. I believe this will help answer the question. That request form was a catchall request form. If you have either seen it or will see it, it is a very vague, general form that asks for people's names and addresses and phone numbers and nature of the request. And so it could be for anything, and we got requests for anything: Can you recommend a good golf course? I am coming to Washington. Somebody would write it on paper and give it to me and I would have to respond to it.

You know, or my kids are coming to town, what are fun things to do with kids for 3 days in Washington? Or it certainly is possible that the form could be used for anything, including interest in having a meeting or getting a tour or the kinds of things that we were talking about.

Question. Did you ever have discussions with DNC colleagues while you were director of the NMS about using White House, for want of a better term, perks as a means of raising financial contributions?

Mr. LU. I am not sure I understand the term "White House perks." I mean, if the witness understands that term.

Mr. BEST. I have less problem with that aspect of your question than the portion that deals with raising money. I am not sure if you are saying that you—the use of this, that it should be linked to the availability of a tour of the White House.

Mr. WILSON. Or just using the carrot of a visit to the White House or a night in the Lincoln bedroom or a visit to a particular event as a means of stimulating people to contribute money.

Mr. BEST. And the question is: Have you ever had conversations of that nature?

The WITNESS. Well, I don't recall having such conversations. Again, I was not concerned about the fund-raising aspects exclusively. I was trying to be helpful to all of our constituents and figure out ways that we could be responsive to all of our constituents. So I don't recall having conversations.

EXAMINATION BY MR. WILSON:

Question. Understood that you weren't concerned about fund-raising exclusively, but to the extent that you were concerned about fund-raising, did you have discussions with how—and again this is in the time that you were director of NMS—White House benefits, benefits being access to the White House or any other type of—you know, that somebody might not have public access to but might like to have access to, how they might be used to stimulate people to contribute money?

Mr. BEST. I am sure that the witness has testified that he had a concern about fund-raising, which was one of the predicates of your question that you just formed. I believe his testimony has to do with providing service to the finance department, as well as the other departments and offices at the DNC.

But to the extent that you can answer his question, you may do so. Perhaps the best thing is to maybe reformulate it.

Mr. WILSON. Just to clarify, Mr. Sildon indicated that he wasn't exclusively concerned about something, and I interpret that to mean that, therefore, there was some concern, given that it wasn't exclusive, there was some small concern.

The WITNESS. Perhaps I choose—this was a matter of semantics. I probably should have said specifically concerned about fund-raising as opposed to exclusively. Again, I trusted that the people who worked at the DNC in the finance division were doing their job to raise whatever money they needed to raise. My responsibility was not necessarily one of making sure that they were meeting their financial targets.

Mine was a responsibility of being responsive to that department, as well as the chairman's office, and political, and the Office of State Chairs, and anyone else at the DNC that might seek some kind of assistance for them to all better do their jobs.

And so maybe exclusively was the wrong word. I guess I should say I wasn't specifically aware of the financial implications and how it might help a division, because that wasn't my specific charge as Director of National Membership Services.

EXAMINATION BY MR. WILSON:

Question. Did you ever make any suggestions to any of your—of DNC colleagues, either in NMS or in other divisions, as to how you might use to better advantage for fund-raising purposes access to the White House or other similar and for want of a better word I will use perks?

Mr. LU. I am sorry. Could you read that question back.

[The reporter read back as requested.]

The WITNESS. Again, it was not my responsibility to be—I was trying to be responsive.

Mr. BEST. No. He asked you if you had conversations. You are explaining why you didn't have conversations but you never say whether or not you had such conversations.

The WITNESS. Thank you. And, no, I have not—I don't recall having such conversations.

EXAMINATION BY MR. WILSON:

Question. Do you know if the White House mess was ever used to entertain supporters, DNC supporters?

Answer. I don't know. I didn't have mess privileges.

Question. Did you ever facilitate individuals—any individual's use of the White House mess?

Answer. Not that I recall.

Question. Do you know if anybody in your office helped people to go over and eat at the White House mess?

Answer. Again, I don't recall.

Question. Did you ever send any names of people to be considered as White House overnight guests, send to the White House such names?

Answer. No.

Question. Did you ever receive requests—a request from anybody at the DNC about having somebody spend the night at the White House?

Answer. I am sorry. Can you repeat the question?

Question. Did you ever receive a request from anybody at the DNC about helping somebody to go and spend the night at the White House?

Answer. Again, I don't recall that.

Question. Do you recall whether you ever received a request from a non-DNC person to help them to spend the night at the White House?

Answer. No.

Question. Do you know how somebody who is interested in spending the night at the White House might go about getting an invitation to spend the night at the White House?

Answer. I don't.

Question. Did anyone ever discuss with you whether the President was interested in having people stay at the White House?

Answer. No. I don't believe I ever had such a conversation.

Question. Do you know if places were reserved on either Air Force One or Air Force Two for DNC supporters?

Answer. I am not aware of spots being reserved.

Question. Did you ever have any discussions with DNC colleagues as to whether it was a good idea to have Air Force One or Air Force Two places reserved for DNC supporters?

Answer. Actually, I should tell you that in 1993 I was told specifically by—well, I remember this information being discussed. I don't recall who I talked to about it, but we were told—I was told that DNC supporters were not going to be able to be on Air Force One, and I never thought twice about it again.

It was someone at the White House, I believe maybe in political affairs. The discussion came up while I was fund-raising for an event in Miami, one of the first events. The President was going to fly down. There were discussions about, well, the Republicans used to have people fly up to Washington and get on Air Force One with the President and travel with him to event sites, and there were all these people in Florida who knew that that occurred, and they wanted to go to Washington to get on Air Force One or actually in this case to get on the Vice President's plane and fly down with the Vice President so they could get off the plane with the Vice President and walk down the steps with the Vice President in their hometown.

And I was specifically told, though I don't recall by whom at the White House, I was specifically told by the Office of Political Affairs that will not happen. And don't ask. And I never asked again, ever.

Question. And to the best of your recollection, was this—did this take place when you were regional finance director?

Answer. Did what take place?

Question. The conversation or communication that you have just alluded to.

Answer. Yes, that was while I was in the finance division trying to deal with logistics of a particular event.

Question. Do you know if places were reserved at White House private dinners for financial contributors to the DNC?

Answer. I know that the——

Mr. BEST. He is asking about financial contributors. Listen to the question.

The WITNESS. I appreciate that.

Mr. BEST. Okay.

The WITNESS. There were no spots ever reserved for DNC people, period. There would be times when the White House might say, we are having a dinner and if there are people that you think are important to attend the dinner, you might provide us with a few names. But there was no guarantee that the names that we sent over would get into the dinner.

There were no specific slots assigned; gee, we have got X number of slots which you can fill. And certainly, those people, if we did send over names, weren't necessarily finance contributors. The White House would say, if you want to send over a few names, you can send over a few names. They might all be from the chairman's office or they might all be political supporters. And there is no guarantee that any of them got in. And, in fact, frankly a lot of times our names weren't put into events.

EXAMINATION BY MR. WILSON:

Question. Are you aware of this from your time as director of the NMS?

Answer. Correct.

Question. And did you sometimes receive phone calls like the one you have just described or communications like the ones you have just described?

Answer. We had previously discussed meetings that occurred about events at the White House. During those meetings, they would indicate, there is a dinner in 3 weeks and there is a large event on the South Lawn in 6 weeks and if you want to submit some names, we will consider them among the many names that we are considering for an event.

So while I was—those conversations occurred while I was director of the program, attending those meetings.

Question. While you were director at NMS, did you ever receive a request from the White House to provide names of certain categories of financial contributors for one of these types of events?

Answer. I am sorry. I need you to repeat the specific question again.

Question. I will ask the reporter to help me out.

The WITNESS. No.

Mr. BEST. What do you mean by specific categories?

EXAMINATION BY MR. WILSON:

Question. Did you ever get a phone call where somebody might have said something like, we are having a dinner, can you send over some names of managing trustees?

Answer. No.

Question. And going from that, that is a specific question going to a very general question. Do you recall any instance where the White House mentioned that there would be an event of any sort and they were interested in having names that would be delineated by amount of contribution or amount of support to the DNC?

Mr. LU. I am going to object to that question. I think Mr. Sildon has already testified repeatedly that the services were not distributed based on financial contributions. In fact, he never even had access to that information. So if he wants to answer the question, he can.

Mr. WILSON. That wasn't my question. That wasn't even implicit in my question.

Mr. LU. You are asking him whether the White House called asking for names of people based on contributions.

Mr. WILSON. Correct.

Mr. LU. What I am saying is that Mr. Sildon has already testified he never had access to financial information about the supporters.

Mr. WILSON. That wouldn't prevent the question being asked of him.

Mr. LU. I will object to the question.

Mr. WILSON. That wouldn't prevent the question being asked of him at all.

Mr. LU. I think we have gone through this.

The WITNESS. I will——

Mr. BEST. Let them finish.

Are you finished?

Mr. WILSON. Yes.

The WITNESS. My answer is no.

EXAMINATION BY MR. WILSON:

Question. Did you ever discuss requests made on behalf of individuals for the individual being put on a board or a commission?

Answer. Well, I generally recall discussions about boards and commissions, but I don't remember if that was just hearing conversations or somebody specifically asked me. But I didn't handle boards and commissions.

Question. Do you know who at the DNC might have been more directly involved in handling requests of that nature?

Answer. I don't.

Question. Did the DNC ever use the President's box at the Kennedy Center?

Answer. Yes.

Question. Just by way of background, because I literally don't know this, how often did the President or does the President have access to events at the Kennedy Center?

Answer. I don't know, because I don't work for the President—I didn't work for the President.

Question. Have you ever had conversations with people who do work with the President where they have indicated to you that the President has access to the Kennedy Center?

Answer. I don't recall those conversations.

Question. You mentioned the DNC did use the President's box at the Kennedy Center. For what purpose?

Answer. To allow supporters to watch events that were occurring at the Kennedy Center.

Question. How frequently did that occur?

Answer. How frequently did what occur?

Question. DNC supporters using the President's box?

Answer. Maybe a couple of times a month. You know, there were—there were three halls at the Kennedy Center so I would say a couple of times a month total amongst all three halls, matinee and evening and weekend performances.

Question. That actually goes to my earlier question. Again, I don't know what the background is, but is it your understanding that the President has space reserved for all performances in all venues within the Kennedy Center?

Answer. Well, your previous question was, how often does the President have access to these. And I answered, I don't know how often President Bill Clinton had access to his box. If you are asking about the President's box, I mean, it is his box. They don't rent that out to other people. They don't sell that to the public. That's a privately reserved box, just as any corporation, I assume, can lease a box at the Kennedy Center.

So he, therefore—I don't know about him and that's why I answered your previous question as I did. If you are asking about other things, if you want to restate the question, I would be happy to try and answer it.

Question. That gives me all the background I need.

Who, within the White House, was in charge of access to the President's box?

Answer. A woman named Debi Schiff was the person to whom I believe the Kennedy Center sent the tickets.

Question. Did she ever contact you offering you use of tickets——

Answer. Yes.

Question [continuing]. For events?

Answer. Yes.

Question. Did you ever contact her asking for tickets for specific events or specific nights?

Answer. Yes.

Question. How often would you do that?

Answer. Well, I certainly probably contacted her a few more times than she was able to help out. There appeared to be many people, including White House staff and administration staff, who also put in requests to get—sit in these seats, and so I don't recall specifically how many times I contacted her. It wasn't a significant number, but it was an occasional number. Someone was in from out of town.

Question. Did you send out formal invitations to the people for whom you were helping to get tickets to the Kennedy Center?

Mr. BEST. What is a formal invitation as compared to just a regular invitation?

Mr. WILSON. Actually, I will rephrase that.

EXAMINATION BY MR. WILSON:

Question. Did you send out invitations of any sort to people, written, in advance invitations?

Answer. Not that I recall. And very often we did not get these tickets until the very last moment. You know, a phone call at 4:00 for a 7:00 performance. And oftentimes we were called to say if a staff person wanted to go, is there someone over there who would like to go? We have two tickets for tonight that aren't going to be used.

Question. Do you recall whether there was a special arrangement between the White House and the DNC for access to Presidential tickets on any particular night of the week?

Answer. We are still referring to the Kennedy Center?

Question. Yes.

Answer. Again, not that I recall. I mean, I don't think the Kennedy Center had a regular schedule so that we could have automatically had, you know, every Saturday matinee, for example, because they might not have a Saturday matinee.

Mr. WILSON. I would just like to provide Mr. Sildon with a document. It is a memorandum to Eric Sildon from Jay Dunn dated September 2, 1993.

EXAMINATION BY MR. WILSON:

Question. It is my understanding that this is—was a memo that you had received when you were regional finance director in the finance department. Am I correct on that time frame?

Answer. That—the time frame would look right, that's correct.

Question. And the bit I direct your attention to is the first sentence on the second bullet point, which reads, we have the box every Thursday evening for performances at the Kennedy Center.

Is this an accurate statement?

Mr. BEST. Is what accurate? Did he get the memo or was Dunn correct when he made that statement?

Mr. WILSON. Correct.

EXAMINATION BY MR. WILSON:

Question. Was Dunn correct when he made this statement?

Answer. I have no reason to think that Jay would have written that to me if that wasn't the case, but it doesn't refresh my memory.

Question. Do you recall receiving this memorandum?

Answer. I don't recall receiving it, but I am—no, I don't recall receiving this memo.

Question. Do you recall any conversations that you participated in wherein it was discussed having regular access to a box on a particular night of the week at the Kennedy Center?

Mr. BEST. We are now referring to the period in 1993, when he was regional——

Mr. WILSON. To any time at all during employment at the DNC.

The WITNESS. About a specific evening?

EXAMINATION BY MR. WILSON:

Question. Right.

Answer. Again, I don't recall such conversations.

Question. Did you ever receive any requests from Mark Middleton expressing an interest in having financial contributors to the DNC use the President's Kennedy Center box?

Mr. LU. Again, we are talking about this time in September of 1993 or at the time that he was in National Membership Services?

Mr. WILSON. If you could read the question, I believe I asked "did you ever." So my question is, did you ever.

If I could ask the reporter to read the question back.

Mr. BEST. We will assume that's what you asked in terms of responding.

The WITNESS. I don't recall having such conversations with Mark.

EXAMINATION BY MR. WILSON:

Question. Do you recall any conversations where Mr. Middleton requested that you help him obtain Kennedy Center Presidential box tickets?

Answer. Well, I don't recall such conversations and I—not to belabor this point, but Mark worked at the White House in the chief of staff's office. I don't know why Mark would call me to get tickets that were at the White House. First of all, we didn't get tickets very often, as I have previously stated; just a couple of times a month. So I don't see any logic to why he would have contacted me to get something that, frankly, his place of work controlled.

Question. Do you know who invited DNC supporters to Presidential radio addresses?

Answer. No.

Question. Did your office ever invite individuals to attend Presidential radio addresses?

Answer. Well, I need to clarify for just a minute. We never invited anyone. If somebody came to us and said—if a DNC staff person came to me and said, there is somebody I would like to try to get into a radio address, I just as a matter of form had a memo to a staff person at the White House that I just would change the person's name and send it over with their date of birth and social security asking the White House to consider inviting them. It didn't mean that the White House necessarily did it. I couldn't issue the invitation because I didn't have a regular slot to put people into a radio address.

Question. Do you recall who your form memorandum would be addressed to?

Answer. Well, there were a couple of different people, I believe, who were working that department. David Levy was the person who most often, I believe, I sent the

memos to. But David wasn't there the entire time. I don't think he was in that role initially, and there may be others as well. But I do recall David Levy.

Question. Do you know what people were instructed to do if they were to attend a radio address? I am asking for mechanics here, where they would go, who they would report to, what they would have to do to actually listen in to the address?

Answer. I am not sure how this is relevant to my job at the DNC.

Question. No, I am just asking you whether you do know, to the extent you might have forwarded requests along to help facilitate somebody attending a radio address. Do you know what they had to do when they actually attended?

Answer. I generally know what they had to do.

Question. And in a general sense, what was required of them?

Answer. They would go to a previously designated gate, White House gate, as determined by White House staff, where they would present identification. I am guessing there was some kind of list but I don't know that for certain.

They would then be directed towards the—towards the West Wing lobby, I assume, and then somebody from the West Wing lobby would take them from there to wherever they needed to go, wherever the radio address was occurring.

Question. Do you know where the radio addresses were broadcast from?

Answer. I understand the location of the radio address has changed based on a variety of circumstances.

Question. Do you know whether the President held any regular lunches for CEOs or for businesses?

Answer. I very vaguely recall hearing about—well, perhaps I more generally recall hearing about—that there was some kind of gathering for CEO lunches. Frankly, that rings a bell.

Question. Do you know if DNC supporters were invited to any of these lunches?

Answer. Well, again I just—I kind of generally remember that these lunches were occurring, but I don't think I have enough recollection about the lunch to be able to specifically answer a question like that.

Mr. BEST. Was it something that you did in your position in Membership Services?

The WITNESS. I really don't recall. It wasn't something that I did regularly. Like if you asked me, did we handle White House tours, I could tell you yes because we did it every week. I don't recall any kind of regular lunch or that I was responsible for placing people in any kind of lunch like that. But I will say that it does sound familiar that such a lunch may have occurred, but I don't know if it was on a regular basis or who attended. But I do recall that there—generally recall.

EXAMINATION BY MR. WILSON:

Question. Do you know if any spaces at these types of lunches were set aside for DNC supporters?

Answer. I don't. I don't know that.

Question. Did you ever——

Mr. BEST. You used the term "supporter" and you have used it before, and I take it you mean a fund—in a fund-raising capacity. Because the term "supporter" is a more generic term in the political business. I understand to include as a supporter someone who goes out and does political outreach is a supporter. So that I am a little—I am a little concerned that what you mean by the term "supporter" when you use it.

Mr. WILSON. Well, what I do mean is that a financial contributor would be a subset of the term "supporter" and the term "supporter" is a very wide universe of people who could be volunteer workers or columnists who write articles favorably. It could encompass many different things. If there was indication, I would probably attempt to go and be a little more definite. I ask these across the board. If I am asking these questions and there is just a straight no, then that enables me to move on.

The WITNESS. Great.

Mr. WILSON. And I will attempt not to belabor points that are just completely unknown to you.

Mr. BEST. That's helpful. Thank you.

EXAMINATION BY MR. WILSON:

Question. Do you know, did you ever help to arrange for meetings with the Vice President? Having just come down from this supporter dialogue, any type of individual that would be referred to you as somebody, I would like you to help this individual to get a meeting with the Vice President, who is a supporter?

Mr. LU. I think he has already testified in his capacity as a fund-raiser that he arranged events for the Vice President. I assume you are talking about in his second role at the DNC.

Mr. WILSON. Well, my understanding is that if somebody arranged events for the Vice President that doesn't necessarily mean that he is helping an individual get a meeting with the Vice President.

Mr. LU. Well, I don't know if we have established it or not, but what Mr. Sildon testified to——

Mr. WILSON. So I asked a very different question.

The WITNESS. Why don't you tell me if—are you asking in my role—I am sorry. But we just keep jumping back and forth between my fund-raising responsibilities in 1993 and my service and constituent responsibilities in '94 and '95.

EXAMINATION BY MR. WILSON:

Question. It makes it difficult.

Answer. Yes, it does make it difficult.

Question. I will ask one and then I will ask the other.

Answer. Okay.

Question. In your role as regional finance director, did you ever set up meetings between an individual and the Vice President or help to set up meetings?

Answer. One-on-one meetings?

Question. Yes.

Answer. Not that I recall.

Question. Did you ever set up small group meetings between individuals and the Vice President?

Answer. In advance of a fund-raising event, there might be a small gathering of 20 people in a room to greet the Vice President when he arrives at a hotel to shake his hand.

Question. In your capacity as director of the NMS, did you ever attempt to facilitate one-on-one meetings with the Vice President?

Answer. Again, not that I recall.

Question. Did the DNC ever issue invitations to people to attend movies at the White House?

Answer. No.

Question. Did you ever help to facilitate people going to attend a movie at the White House?

Answer. Candidly, I may have, but I don't recall.

Question. Do you know if you ever received schedules of movies in advance?

Answer. No.

Question. You don't know or you didn't receive any schedules?

Answer. I don't believe that I received a schedule of movies indicating that on this night they are showing this movie and on this night they are showing that movie.

Question. Do you recall whether you ever helped—and this is exclusively at the time period when you were director of NMS—to facilitate a lunch between somebody and Mack McLarty?

Answer. Not that I recall.

Question. Did you ever receive any requests for individuals to have lunch with Ira Magaziner?

The WITNESS. Can we take a break for just a minute?

Mr. BEST. Sure. We can take a break any time.

Mr. WILSON. That's all right.

The WITNESS. Excuse me just one second.

Mr. WILSON. Surely.

[Discussion off the record.]

Mr. WILSON. If we could go back on the record. If you will, please, read back the last question that I asked.

[The reporter read back as requested.]

The WITNESS. I don't recall that, but I need to state, you know, this was 3 and 4 years ago and I just don't recall every request that came to me or every memo I may or may not have written. If you have information that you would like to provide to me or show to me, if there is something I ought to see, I would be happy to look at it and try to respond. But as far as generally what do I recall from a job that occurred in some cases more than 3 years ago, I don't recall that.

EXAMINATION BY MR. WILSON:

Question. Did you ever have requests brought to your attention for people to use the President's box at the Warner Theater or Wolf Trap?

Answer. No, not that I recall.

Question. Did you ever work to—did you ever help people to have their photographs taken with the President?

Answer. Yes.

Question. How did that process work?

Answer. Well, I am not sure it was a process. That was a pretty general question. You know, if somebody is attending an event that's at the White House and they want to get their picture taken with the President, I might contact someone at the White House and give them that head's up.

But, again, it was simply to pass along information to someone over there to make them aware of it.

Mr. BEST. Let me ask this: A photo opportunity with the President was not a—was not an isolated event; was it? It was always in conjunction with attendance at another function at the White House?

The WITNESS. As far as I know, that's correct.

EXAMINATION BY MR. WILSON:

Question. Which anticipates my next question. Were there situations where you would get a request for an isolated event for somebody to go up and have their picture taken with the President, outside of an event, outside of some prescheduled event?

Answer. You mean that someone, a staff person at the DNC would contact me and say, we have heard from so and so and they would like to go over to the White House and get their picture taken with the President?

Question. Correct.

Answer. It is possible. I don't think that there was any kind of specific formula for that. I don't—I certainly on a regular basis was not sending requests over to the White House that a certain person wanted to come over and have a one-on-one and while they were there have their photo taken.

Question. Do you remember any specific instances where somebody did go over and have their picture taken outside of going to an official event?

Answer. I don't recall any situation like that.

Question. Did you have any requests while you were director of NMS to get photographs signed by the President?

Answer. Yes.

Question. And how would you generally get that done?

Answer. All photos I would send over to the Office of Political Affairs and let them handle it however they did, whether it was an auto pen or a real picture of the President. That was something that they handled.

Question. And by that, do you mean the Office of Political Affairs in the White House?

Answer. I am sorry, in the White House, correct.

Question. Do you recall whether DNC supporters were ever sent birthday cards from the President?

Answer. Yes.

Question. Do you know how people were selected to receive a birthday card from the President?

Answer. Are you talking about people meaning DNC supporters?

Question. Yes.

Answer. I would simply send a request over to the White House and, you know, somebody said to me that for something innocuous like a, you know, a form—it is not an actual letter from the President. Usually it was a card or maybe it was some kind of form letter that they just ginned out, you know, send a request over to political affairs and say this person is turning 65 or 80 or 50 or their child is turning 16, can the President send a birthday letter?

Question. Was this always done on a case-by-case basis?

Answer. Well, again, it wasn't up to—as I previously stated, I wasn't the person vetting the request. If somebody thought it was important enough that they came to me, you know, I would send it over. It is up to the White House whether or not they want to fulfill the request. And it was up to some person previous to me as to whether it was worthwhile enough to submit to me to submit to the White House. I was simply being a conduit between departments that had requests and the appropriate place at the White House that would consider whether they wanted to resolve the request.

Question. Did you ever receive requests for a card to go to more than one individual at any one time? And by that I mean, did anybody ever give you a list of people

and say, could you please arrange for these people to get birthday cards from the President?

Answer. Well, we only—I mean, it is possible. Is there more—I tended to make a request for a birthday card around the time of somebody's birthday. Are you asking did I send over a list of 10,000 people and say, here are the birthdays, fire at will? I don't recall doing that.

Mr. WILSON. I would like to show the witness a memorandum, which it is dated November 29, 1993, and it is to a number of people who are not designated by last names from somebody named Tara.

The WITNESS. I see it.

Mr. WILSON. There is a handwritten note on the bottom of this memo that reads, "Eric, Pls. see me about the birthday project Ceandra started," and "Thx," I believe, "Martha."

EXAMINATION BY MR. WILSON:

Question. First does the "Eric" referred to in this note refer to you?

Answer. I don't know. I would assume so.

Question. Do you recall seeing this particular memorandum?

Answer. I actually do not recall seeing this.

Question. Do you know what the birthday project was?

Answer. I do not.

Question. There is what I believe is a name here in this note. I think it would be pronounced Ceandra, C-E-A-N-D-R-A.

Answer. Correct.

Question. Who is that individual?

Answer. Well, I only know one Ceandra, so I am assuming it is Ceandra Scott, who did work in the chairman's office at the DNC and reported to Martha Phipps. And at the top of the memo it indicates Martha Phipps, so I am assuming.

Question. Do you recall any discussions about something that was termed "the birthday project"?

Answer. I do not.

Question. Do you recall whether you ever sent a list of DNC trustees to the White House?

Answer. If I sent a list of DNC trustees to the White House?

Question. Yes.

Answer. The complete trustee list?

Question. Well, any list. You know, I am not asking for knowledge of a specific list, but do you recall whether you ever sent over a list of trustees, be it inclusive or partial, to the White House?

Mr. BEST. You mean in response to this memorandum——

Mr. WILSON. No.

Mr. BEST.—of 11–29.

EXAMINATION BY MR. WILSON:

Question. No. In general, do you recall ever submitting a list of trustees, DNC trustees, to the White House for any reason?

Answer. I don't recall that but—I don't recall that.

Question. Do you recall whether there was any discussion among your colleagues in the general time period that this memorandum is dated, and the memorandum is not dated—I will make that clear for the record—it is dated November 29, with no year. There is a fax transmission at the top which indicates that it was faxed from somebody to somebody on November 29, 1993. So, again, I assume this is the time that you were regional finance director at the DNC.

Do you recall whether there were any conversations that either you participated in or you overheard that involved having a list of trustees sent to the White House?

Answer. No. And I also would like to add, I can recall that around that time I was in Philadelphia because I was responsible for a fund-raising event with the President in Philadelphia that occurred, I believe, the first week in December 1993, and I was in Philadelphia for about 3 weeks. I mean, I remember coming from Philadelphia to Washington to come home for Thanksgiving and then driving back to Philadelphia. So on 11–29 I would not have even been in Washington.

Question. When you were regional finance director, do you recall whether the White House ever provided the DNC with a list of birthdays?

Answer. I don't recall that.

Question. Speaking of either when you were regional finance director or director of the NMS, did you ever see any list of names that were provided to you or to the DNC by the White House?

Mr. LU. What types of names?
Mr. BEST. Yes.
Mr. WILSON. Names of individuals, people.
Mr. BEST. For what purpose?
The WITNESS. From the White House back to me?

EXAMINATION BY MR. WILSON:

Question. Correct.
Answer. That's such a vague—it's such a broad question. I mean——
Mr. BEST. Can you elucidate in any way?
Mr. WILSON. I am trying to be very vague, actually. Thus far, I think my understanding is that there have not been lists of any sort passed back and forth between the DNC and the White House that you are aware of.
Now, I should clarify that. I could take that out of your—the realms of when you were in the fund-raising capacity because I have no interest in knowing whether there were names sent back and forth when you were a fund-raiser at the DNC.
But from the time that you were director of National Membership Services, do you recall whether you would get a database or a spread sheet of names from the White House for any purpose? And, you know, to not be so mysterious, my understanding is that a lot of what you were involved in doing was facilitating requests, helping people get things done, and pretty much ad hoc situations where a few people would do one thing or maybe more than a few people, but I am trying to determine whether there was a reason for the White House to send you any list of names of individuals.
The WITNESS. Not that I recall.

EXAMINATION BY MR. WILSON:

Question. Are you familiar with the White House database?
Answer. I am only familiar with it in the sense that I have read about it in the newspaper.
Question. Is your knowledge of the White House database, then, confined exclusively to media reports about its existence?
Answer. That's correct.
Question. Do you know if anybody in your office ever had access to the White House database? And your office being the National Membership Services office.
Answer. I need you to define what the White House database was.
Question. Well, I mean I am asking you that question, in terms of are you familiar with something that was called the "White House database"?
Answer. As I previously stated, the only information I know about, a broad database referred to a term of art, the White House database, is what I have read in the newspaper.
Question. Did either you or any of your employees or colleagues in the NMS have access to any White House computer database?
Answer. Yes.
Question. And what was that?
Answer. In the social secretary's office, there was a—as I understood it, it was their own internal list of people that had attended social secretary events such as a jazz festival for a thousand people on the South Lawn or fireworks on the 4th of July or a private dinner. And there would be occasion to almost exclusively call over to the White House and say, in response to a White House request from a different area, without getting into too many tangents, somebody at the White House would say there is an upcoming event and if you would like to submit a few names, you may do so.
Again, as I previously stated, no guarantee that those people were getting in. Those weren't names submitted for specific slots; it is just we are doing an event, if you would like to submit some names we will consider them in the big list of names.
So in trying to figure out who to submit, I think there was an interest not to keep putting in the same people. It wasn't fair for someone to go three times if someone else hadn't gotten to go to the South Lawn.
In that regard, we might call over and say, here are 10 names but we only get to submit 3, can you help us figure out who has been, because we might think that a person, a DNC supporter, had never been to the White House and later we find out they have been four times because we didn't invite them, the White House, of course, invites them. So we wanted to try to preclude the same people being invited over and over again.

So I might occasionally call over to say, I have a chance to submit a few names as a request in response to—in response to a request from a different department. Can you help me find out if any of these people have been there at all? And they might respond back accordingly.

Question. And who did you call for help of that nature?

Answer. Oh, just staff in the social secretary's office.

Question. Did they ever send you lists of names so that you could check yourself as to whether people had attended or not?

Answer. No. And as a matter of fact, they were pretty clear about the fact that that was not the kind of information that they could ever provide to us.

Question. When you were making requests of that nature, checking to avoid duplication of people who would attend events, did you ever have discussions with people in the social secretary's office or did they ever ask you to send over names of individuals that they could enter into their whatever type of database they were using to help avoid duplication?

Answer. In the social secretary's office?

Question. Yes.

Answer. No.

Question. Do you know if any other DNC officials or colleagues of yours ever would get lists of names from the White House to help facilitate attendance at White House events?

Answer. I wouldn't know.

Question. Do you know if there was any political information, such as whether a DNC—whether a person was a DNC trustee, whether that type of information was contained in the information that the White House kept on computer?

Mr. LU. Are you referring to the social secretary's computer that he has testified about or any other database?

Mr. WILSON. Any other.

Mr. BEST. Do you know?

The WITNESS. I don't know.

Mr. BEST. Okay.

EXAMINATION BY MR. WILSON:

Question. Did you ever work with Truman Arnold on providing names of individuals to the White House for events that the White House was hosting?

Answer. I never directly worked with Truman Arnold.

Question. Did he ever work with anybody in the National Membership Services?

Answer. He may have but I am not aware of any.

Mr. WILSON. I will provide the witness with a letter from Al Gore to B.J. Thornberry. If you would take just a moment to read through this letter, please.

The WITNESS. Uh-huh.

Mr. BEST. You understand that this letter was written after this witness left the Democratic National Committee?

Mr. WILSON. Yes.

The WITNESS. Okay. I see the document.

EXAMINATION BY MR. WILSON:

Question. Bearing in mind that this letter did go to the DNC after you had left, do you know of any discussions during your tenure as director of NMS about a database kept by the Vice President?

Answer. No.

Question. Were you aware that such a database existed?

Answer. I was not aware of it until you presented this piece of paper to me.

Mr. BEST. This is almost a year after this witness has left the Democratic National Committee.

EXAMINATION BY MR. WILSON:

Question. In arranging activities for DNC members, did you have any contact with Ann Stock?

Answer. Yes.

Question. Do you recall what her position was?

Answer. She is—was, as I understand it still is, White House social secretary.

Question. Why did you interact with Ms. Stock?

Answer. Because she, as White House social secretary, was responsible for the planning of practically all the events at the White House.

Question. Was her authority more or less over all of White House events or did she have an area of concentration or expertise?

Answer. Well, I am sorry, it would be difficult. You would have to talk to Ann Stock about what her responsibilities are. I just know her as the White House social secretary.

Question. Did you have any contacts with Ricki Seidman——

Answer. No.

Question [continuing]. When you were at NMS?

Answer. No. I am familiar with her name. I did not have any direct contact with Ricki.

Question. Do you know if any of your colleagues in NMS contacted or worked with her at any time during your time at NMS?

Answer. What was her role? I don't know.

Question. Okay. Do you know—do you know who Mike Lufanio is?

Answer. Yes.

Question. And who is he?

Answer. There was a period of time, I believe, that Mike Lufanio was either—he was a senior official in the Office of White House Advance.

Question. And did you have any reason to contact him when you were at NMS?

Answer. Well, I don't recall. I mean, I—I knew Mike outside of my role as director and so I may have had contact with him, but I don't specifically recall if there was a reason why professionally I may have contacted him.

Question. Do you know whether or not he had any role in arranging for people to fly on Air Force One or Air Force Two?

Answer. I don't know. I certainly didn't have any kinds of conversations with him like that.

Question. At the time you were director of NMS, did you have any conversations with Alexis Herman?

Answer. Not—not directly.

Question. Did you have any—did you relay requests to her indirectly?

Answer. No. But she was in charge of the Office of Public Liaison, which is, as I previously stated, was an office I did have contact with. So, you know, my requests would be sent to the Office of Public Liaison for which he was—whatever her title was, director, but I did not have direct conversations—she didn't call me; I didn't call her. I didn't bump into her in the hallway and stop and, you know, have a conversation with her about anything.

Question. What does the Office of Public Liaison at the White House do?

Answer. I don't—you would have to ask them specifically. Generally, they handle outreach to the various constituent groups.

Question. Did you have any contacts, at the time you were director of NMS, with Patsy − Thomasson?

Answer. I was introduced to Patsy. I specifically recall it was just at a meeting and she was there, and I was introduced to her. And I never had any kind of direct——

Mr. BEST. The extent of your contact with her was this introduction?

The WITNESS. It was.

EXAMINATION BY MR. WILSON:

Question. Do you recall whether any of your colleagues at NMS had any contacts with Patsy − Thomasson?

Answer. I don't recall. Certainly it is possible but I don't recall that.

Question. Earlier you mentioned the name David Levy. I believe I recall that you mentioned it in connection with radio addresses.

Answer. Correct.

Question. Did you contact him on any other matters while you were director of NMS?

Answer. Well, I would like to restate something I said earlier, which is I don't recall that. He was in the Office of Communications. It is possible that I perhaps contacted him on something else that fell into the purview of the Office of Communications just because he was a contact that I knew would take my call. We had a friendly relationship. So it is possible I may have contacted him on something else. I don't specifically——

Question. I may have misspoke. I didn't mean to put words into your mouth and I may not recall correctly. So I wasn't trying to characterize what you said about David Levy. I just remember you brought the name up before.

Answer. Sure.

Question. What was his position?

Answer. Well, I don't know his specific title but he did work in the—and I am not even certain of the exact title of the office but it was basically the communica-

tions office. And, you know, we had common interests so we would strike up conversations every once in awhile about things totally unrelated to work. So it is possible that I may have contacted him on something else, but I don't recall specifically any reason to contact him professionally for anything other than to submit those radio address requests.

Question. At the time you were director of NMS, did you have any conversations with Jack Quinn?

Answer. Yes.

Question. And what did you discuss with Mr. Quinn?

Answer. In that sense, I definitely don't specifically recall.

Question. And do you recall why you contacted Mr. Quinn?

Answer. Well, he had a variety of responsibilities during his tenure at the White House, including responsibility, I believe, as chief of staff for the Vice President and, again, you know, in 19—oh, you asked as director of Membership Services.

Question. Just director of Membership Services?

Answer. It is hard for me to separate the time lines. You know, I have—you know, I have—I don't recall. It is possible.

Mr. BEST. That's fine.

EXAMINATION BY MR. WILSON:

Question. Do you know who Marge Tarmey is?

Answer. No.

Question. At the time that you were director of NMS, did you have any conversations with Maggie Williams?

Answer. Yes.

Question. And do you recall the subject matter of any of these conversations?

Answer. I do.

Question. Could you please recount any of the conversations you do recall, of the conversations you do recall?

Answer. The only conversation that I do recall, not that I specifically recall the content of the conversation, but I remember Maggie attending a meeting, one of the final meetings, of the White House Christmas Card Project, as I refer to it, and I think something may have come up in that conversation.

Question. Do you recall what you discussed?

Answer. I really don't. I mean, again, it—it couldn't have been very substantive and it was at least 3 or 4 years ago.

Question. To the best of your recollection when you were director of NMS, was that the one conversation you had with Ms. Williams?

Answer. That was actually the only time I believe that she and I attended any kind of meeting or—yes, that's correct.

Question. Do you know Jodie Torkelson?

Answer. I know the name.

Question. Do you recall having specific conversations with Ms. Torkelson?

Answer. I don't recall having any conversations with her.

Question. As director of NMS, did you have conversations with Nancy Hernreich?

Answer. Yes.

Question. And what did you discuss with Nancy Hernreich?

Answer. I probably discussed a variety of things. She was in the President's personal office.

I remember there was one DNC supporter in particular who had golfed with the President once, and during the course of their outing this particular supporter said to the President, I really would love to have you come to my club once and play golf, and the President said, I would love to do that, and I recall specifically this supporter contacting me and said the President said it, he said it himself, could you please call over and see if he would like to come and play golf with me at my club. And I remember having that conversation with her.

I am certain I reached out to her on other times, you know, to say that I had sent a photo over to the political affairs office but it really would be great if the President could personally sign it, and I know they would be getting in touch with her, those kinds of things; real small things to try to be responsive to people's requests.

Question. Aside from the sort of back and forth of responding to a particular request, do you recall whether she ever contacted you to ask anything—to ask you to do anything?

Answer. Well, she may have had. I wouldn't preclude that. But I don't have a specific recollection.

Question. Do you know Doug Sosnik?

Answer. Yes.

Question. Did you, at the time you were director of NMS, have conversations with Doug Sosnik?

Answer. Well, I am sure I did. Again, I don't—I don't recall what we may have talked about. You know, these are people who may be at meetings that I am at. You know, I just——

Mr. BEST. You don't have to explain.

The WITNESS. Okay. Thank you.

Mr. BEST. Just answer his question.

The WITNESS. Thank you.

EXAMINATION BY MR. WILSON:

Question. Do you recall any specific requests Mr. Sosnik might have made of you during the time that you were director of NMS?

Answer. I don't specifically recall requests that he may or may not have made.

Question. Do you recall whether Karen Hancox ever called you and asked you to do something?

Answer. I can't imagine that she would have called me to ask me to do something for her.

Question. Do you have any recollection of specific requests that you made of her?

Answer. Well, Karen was—I need to clarify this. Karen was a name who I was told I should send memos to if I was sending a memo to the Office of Political Affairs. So Karen and Doug Sosnik as well would often be names on my "to" line on a memo. It doesn't necessarily mean I was really requesting anything of Karen or Doug. I was just told formally, if you are sending a request to the Office of Political Affairs, send it to Karen or Doug. It would go to a staff person. Whether it ever made it up the food chain to those folks, if they ever saw my memos, I don't know.

Question. What type of memoranda would you send over to the White House Office of Political Affairs?

Answer. These are all the kinds of things we have discussed, somebody would like to get a birthday card for their 80-year-old mother. Somebody would like, you know, to—whatever, attend—I know, go to the President's box at the Kennedy Center. All of those kinds of requests I would submit to the Office of Political Affairs for them to decide how to appropriately disseminate and handle the requests or not handle the requests in the White House. Once it got sent to Political Affairs, they did whatever they did and they would provide the answer.

So I would send these memos of all different kinds of nature to Karen or Doug. I just want to be clear about that in case you have a series of memos with my name on it to Karen or Doug that, you know, I probably talked to Karen Hancox half a dozen times in my whole life. But I have probably sent several memos to her. I just want to clarify that.

Question. Where else would you send written memoranda in the White House, if anywhere?

Answer. Memos could have gone to Debi Schiff who, as we talked about, was in charge of Kennedy Center tickets. It could have gone to the photo office where sometimes the photos that we were seeking could be found and purchased by the DNC, just as any outside person could call the White House and say, I was at an event. Can I have a photo? Sure, $8.80. That was my responsibility to go to the photo office and perhaps look for a photo for someone, and perhaps send a memo along with it. Maybe someone in the Office of Political Affairs, public liaison, you know, we have talked about Ann Stock and the social office, because I submit names for events. Mostly there was a lot of hierarchy just as anywhere in the work world, there is a lot of—I might have to put names on memos because I was told you need to make sure this person gets copied and this person gets copied, but it is not like I was dropping off that memo to all of their services. I would send one memo over to one contact at the White House. However they disseminated it, it was up to them.

Mr. WILSON. If we could go off the record for a moment.

Mr. BEST. Yes.

[Off the record.]

[Whereupon, at 12:50 p.m., the deposition recessed to reconvene at 1:45 p.m. this same day.]

EXAMINATION BY MR. WILSON:

Question. Do you know whether regular meetings were held at the White House to discuss invitation lists?

Answer. I need you to be more specific regarding invitations.

Question. To discuss any type of list of names that would be invited—to people who would be invited to attend events at the White House.

Answer. Yes.

Question. And did you attend such meetings?

Answer. Occasionally.

Question. Where were such meetings held?

Answer. They were either held in a room in the Old Executive Office Building or they were held in the Roosevelt Room in the West Wing.

Question. What types of events were discussed?

Answer. Upcoming dinners, events on the South Lawn, events like that.

Question. Were there ever spaces allocated for different types of attendees at such dinners?

Answer. There were spaces allocated for the number of names we could submit to attend such events, but I don't know if the White House allocated a certain number of spaces.

Question. Were there different numbers allocated for different—for official events as opposed to private events?

Answer. No, the difference in any kind of allocation number would be, you know, the location of the event. A South Lawn event obviously could accommodate more people than a—than a dinner in an interior room could accommodate.

Question. Were bill-signing ceremonies discussed during these meetings?

Answer. Not that I recall.

Question. Do you know whether the DNC used the Indian Treaty Room for any purpose?

Answer. I believe that they did.

Question. And do you know for what purpose?

Answer. I don't, but the Indian Treaty Room was used by all kinds of groups for, you know, receptions, and I'm sure the DNC—I recall the DNC, you know, hearing about the fact that the DNC was going to do events there, but I don't know specifically what the events were.

Question. Do you know whether the DNC had an auto pen for the President's signature?

Answer. At the DNC?

Question. Yes.

Answer. Not that I'm aware of. I would say no.

Mr. BEST. Do you know? Do you know whether they had the pen?

The WITNESS. I can't say with certainty, but I don't believe that there was such an auto pen.

EXAMINATION BY MR. WILSON:

Question. Did you or your colleagues at NMS ever draft letters to be signed by an auto pen with the President's signature?

Answer. No.

Question. Did the National Membership Services' office ever handle letter requests to go out to individuals, series of letters that would be sent to a group, a number of people at one time?

Answer. I'm not sure I understand the question.

Question. Did your office ever have letters go out over the President's signature?

Answer. No.

Question. Did your office ever generate any letter that was signed either by the President or the auto pen using the President's signature?

Answer. Not that I'm aware of.

Question. Did your office ever draft notes that ultimately would be sent out over the President's name?

Answer. Not that I recall.

Question. I ask this because my understanding is, there are many pieces of correspondence and they aren't necessarily drafted always by the same person who signs them; and I'm just trying to get a sense of whether there was anything that went out of your office that ultimately—a form letter of any sort that would be signed by the President.

Answer. I—not that I'm aware of. Again, I appreciate that, but not that I'm aware of.

Question. Are you aware of your office procuring gifts of any sort for DNC supporters?

Answer. Yes.

Question. What types of gifts would your office get for supporters?

Answer. Well, actually, we initially, in '94 in the initial stages of the program, helped try to obtain items that the DNC was paying for that the White House was giving out as gifts, a business card holder, presidential cuff links. Events like—or gifts like that.

And there was a feeling that if the DNC was paying for these items, maybe we could try to get some items too. But I didn't actually—so perhaps a modification of the previous question, I didn't actually procure these items. I didn't actually purchase the items, but initially, when the DNC kind of got into this business of having to pay for these items, some of those items ended up in my shop.

Question. And——

Answer. That actually stopped, though, pretty quickly. Somebody else—it wound up being that the Chief of Staff had responsibility, or the Chief of Staff's office at the DNC had responsibility for procuring, obtaining, holding those items.

Question. And when did the change occur?

Answer. Well, I don't specifically recall, but sometime in '94.

Question. How would you determine who received one of these types of gifts?

Answer. Well, again, that was—that was part of the reason why we wound up not having responsibility for that for very long because it—it really wasn't something appropriate for us to decide who should or should not have gifts, because we didn't really have relationships with any of these people.

You know, the reason I initially got involved in it was because they saw me as someone who would try to help, you know, resolve the situation. And I—somehow it just ended up on my desk.

It was just basically assigned to me, you will get the gifts. Okay, fine, I'll get the gifts. Not purchase, but when they arrive, we are going to give you some of the gifts.

So when they arrived, they were put in my office and, well, I didn't know what to do with them. And meanwhile everybody else wanted to have their hands on the cuff links and the other gifts, so they were pretty quickly taken from our shop, not because we had done anything wrong, just there was no real reason for us to have them.

Question. When you did have control of the gifts, did people ever make requests of you on the forms that you sent around to the various offices, the request forms that the offices had to give something to somebody or send something to somebody?

Answer. No, not that I recall. I mean, they may have, but it wouldn't have been my responsibility to provide it, again, to the supporter out there. So somebody came down and said, gee, I'd like to have one of those pens with Bill Clinton's signature on the pen. It was—that's why they had been given to me and stuck in my drawer. It's not like it was a candy jar where people could come take them, but there were very limited numbers and they were there. And I wasn't the person reordering them, and I wasn't restocking them. It really was not something that was around for very long.

Question. Do you recall at the time you were Director of NMS whether you actually did directly give one of these types of gifts to somebody who wasn't a DNC employee?

Answer. Yes. I don't specifically recall, but—who, but, yeah, you know, there was a drawer full of these, and I'm sure, you know, they were——

Question. Do you recall how you got the gift to the recipient?

Answer. I don't.

Question. Did you ever help arrange for DNC supporters to watch sporting events in the White House residence?

Answer. No.

Mr. BEST. I take it you're referring to televised sporting events. Or actual boxing matches at the White House?

Mr. WILSON. I was being very general, not aware of any boxing matches at the White House. I would have been interested in the response if there was such an event.

The WITNESS. I do want to be clear that there are sports teams that come to the White House.

That's not what you're talking about? You're talking about watching an event that's on TV at the White House?

Mr. WILSON. Yes.

The WITNESS. No.

EXAMINATION BY MR. WILSON:

Question. You had mentioned earlier that you attended on occasion the daily scheduling meetings for the President. Did any other DNC employees go with you to attend these meetings?

Answer. Yes, initially Jay Dunn went with me and then later, after Jay had left the program, and Brooke was—Brooke Stroud, who I previously mentioned, became the Deputy, she would attend those meetings.

Question. After attending such meetings, did you serve as a liaison to other offices within the DNC to communicate information to them about the President's schedule?

Answer. Yes.

Question. How did that work?

Answer. Well, sometimes verbally I would say—you know, pass on information I had learned. Sometimes maybe I'd send a memo to department heads and say, this is what we've—you know, this is what we've learned in the meeting, whatever the appropriate information was.

Question. Did you have a usual practice?

Answer. Well, I know that I tried to forward schedules on to people as schedules were made available for us, all internal, not to be distributed outside the DNC. But sometimes it would just be verbal or there actually wouldn't be a printed schedule.

Question. Was there a distinction between the official and private schedules for the President when you attended the meetings that you attended?

Answer. Well, the only schedules that I saw were the ones that they were willing to also let the Office of Public Liaison and the DNC and other offices know. So I never—I don't know the term of art, "private schedule," I don't know how that is necessarily defined. But I would not be given information about, you know, certain private meetings that the President might be having. During certain blocks there would just be something like private time or down time in some of the schedules, as I recall.

Question. Were you ever the DNC liaison for official overseas delegation trips by senior administration officials?

Answer. Just, it's been so long, it's just—I don't remember a specific trip where I may have been.

Question. Do you recall whether people contacted you and told you that there was a trip, an upcoming trip about to occur, and asked for any input as to whether you had any suggestions for people to go on the trip?

Answer. Yes.

Question. And on what occasions; do you recall?

Answer. Well, I do recall specifically there was a gentleman named Howard Glicken who wanted to go on a trip to South America, and he was—you know, he had contacted the DNC several times and was trying to also deal with the White House. And I think he was looking for every possible open door that he could find to help try to move his name along.

Question. Did he contact you directly?

Answer. Howard did, because I knew Howard from my previous role at DNC. Others generally were supposed to contact a relevant department within the DNC, because again I didn't know many of these people, these names, so they wouldn't have known me to call me; but had they called me, I wouldn't have known who they were.

And again, I wasn't the final decision-maker on that. I might forward information along, I've been contacted by someone, he's interested.

Question. Do you recall other people that you were contacted by in relationship to trips?

Answer. Well, he's the only one I specifically recall.

Question. Do you recall whether you were ever contacted by Ernest Green in relation to a trip?

Answer. Not that I recall.

Question. Do you recall whether anybody mentioned to you Mr. Green's interest in being part of an official delegation on an overseas trip?

Answer. Again, I don't recall that right now.

Question. Do you know if any DNC employees went on official delegation trips abroad?

Answer. What do you determine an official delegation trip?

Question. Well, any——

Answer. Paid for by the administration?

Question. Paid-for-by-the-administration trip?

Answer. Not that I'm aware of.

Question. Do you know of any DNC employees accompanying officials who were going overseas to perform some type of government function, attend an event, attend a funeral, attend a meeting or a conference or that sort of thing?

Mr. LU. When you say "DNC official," would you include Chairman Dodd as a DNC official?

Mr. WILSON. Yes.

Mr. LU. Okay.

The WITNESS. Well, I still don't—the answer is no, even including the Chairman. He kept his own schedule; I wasn't aware of it, and at this point, I don't remember the trips that the Chairman may have taken a few years ago.

EXAMINATION BY MR. WILSON:

Question. Have you ever met Mark Middleton?

Answer. Yes.

Question. When did you first meet Mr. Middleton?

Answer. I vaguely remember in 1993, perhaps maybe '94. Sometime in the first year that I was at the DNC, a year or two, so I would say probably 1993—probably.

Question. Did you ever work with him on any project?

Answer. I may have. I may have, but I don't specifically—I can't recollect a specific project that I might have been working with him on.

Mr. BEST. I'm not quite sure I understand what a "project" is as you have used the term. Trying to get someone a seat on a tour might be a project as you have defined it.

Mr. WILSON. I was going to follow up and ask whether——

EXAMINATION BY MR. WILSON:

Question. And my understanding is, Mr. Middleton was a White House employee at the time you were the Regional Finance Director?

Answer. Right.

Question. And so did Mr. Middleton ever make requests for you to do anything on his behalf?

Answer. Really not that I recall.

Question. Do you know whether Mr. Middleton was affiliated with the DNC in 1996?

Answer. I didn't work at the DNC in 1996, so I don't know.

Question. Do you know whether Mr. Middleton assisted in organizing any fund-raising events for the DNC?

Answer. I'm not aware of him doing that.

Question. Are you aware of whether Mr. Middleton hosted any fund-raising events on behalf of the DNC?

Answer. I'm not aware of Mark Middleton hosting any events.

Question. Do you recall whether Mr. Middleton ever contacted you to arrange tours of the White House?

Answer. No, he did not contact me to arrange tours. And as I stated before, when we went kind of down this line of questioning regarding the President's box at Kennedy Center, he had worked in the Chief of Staff's office at the White House. So if you are asking about the period while he wasn't at the White House, he wouldn't come to me—because he worked at White House—looking for a White House tour. He wouldn't have called the DNC. And he never came to me after he left the White House, and I'm assuming because he knew dozens and dozens of people at the White House, including his former boss, Mack McLarty, whom he could have called.

Question. Do you know whether he contacted any of your colleagues at NMS after he left the White House to help arrange for tours or, well, to help arrange for White House tours?

Answer. I don't know if he contacted any of my colleagues. I do know he did not contact me.

Question. Do you know who Holli Weymouth is?

Answer. No.

Question. Do you know if Yusuf Khapra ever contacted you to arrange tours of the White House?

Answer. No.

Question. You know that he did not contact you to arrange tours?

Answer. Yeah, Yusuf didn't contact me to arrange tours. He only—my knowledge of Yusuf was in his role when he worked for the Chief of Staff.

So, again, just as I previously answered with Mr. Middleton, I don't know why someone from the White House would contact someone from the DNC to get a tour of the White House. And those people were all capable of giving—you know, they all had hard passes, and they could conduct a tour themselves. So I don't know why they would call me, with limited White House tickets and no White House access, to give a tour.

Question. Did Mr. Khapra ever contact you for any other reason?

Answer. He was a staff person in the Chief of Staff's office who I occasionally had conversations with. But I don't remember if he called me or I called him and I certainly don't recall any kind of specific conversation with him.

Question. Why did you have conversations with Mr. Khapra?

Answer. I know this is going to sound crazy, but I don't know why I had conversations with him. He was a White House staff person that I had come in contact with, so—but I don't recall the specifics of our conversations that occurred more than a couple of years ago.

Question. Do you recall anyone making a request of either you or your office to make arrangements for a White House tour for the Widjaja family in 1995?

Answer. When in 1995?

Question. Late, late in the year.

Mr. BEST. He left in September.

The WITNESS. Well, I left the DNC in September of 1995.

EXAMINATION BY MR. WILSON:

Question. Again, I will ask you—I'm not certain of the time myself—do you recall anybody making a request of your office to arrange for a tour of the White House for the Widjaja family?

Answer. No. And again tours, even though they were officially under my jurisdiction, I just—whenever a tour request came in, I would provide it to my staff person who was responsible for all aspects of tours. I didn't feel like I needed to check with her to find out who she was providing White House tickets to.

Question. Are you aware any of member of the Widjaja family contacting any DNC employee?

Answer. I'm not. And I also have to tell you, I've never heard the name before until you mentioned it about two questions ago.

Question. That helps, and I'll move on.

Answer. Sure.

Question. Do you know Charlie Trie?

Answer. I've never met him. I am aware of Charlie Trie, but I became aware of Charlie Trie just in name only.

Question. Have you ever spoken with Mr. Trie?

Answer. No.

Question. Are you aware of any of your colleagues at the NMS being in contact with Mr. Trie?

Answer. I am not aware of any of my colleagues—in the National Membership Services program dealing directly with him. Again, it is possible, as we talked about earlier, but I—I—you know, my staff had their own conversations that I wasn't fully briefed on, but I'm certainly not aware of it.

Question. Are you aware of any White House tours that were arranged for Mr. Trie or on behalf of Mr. Trie?

Answer. No.

Question. Are you aware of any occasions in which it was arranged for Mr. Trie to have lunch at the White House mess?

Answer. No.

Question. Are you aware of any occasion on which Mr. Trie used the President's box at the Kennedy Center?

Answer. No.

Mr. WILSON. I'm showing the witness a memorandum to Debi Schiff and Donald Dunn for Mr. Sildon.

The WITNESS. Okay.

EXAMINATION BY MR. WILSON:

Question. Does this—do you remember drafting this memorandum?

Answer. Well, I don't remember it, but that's certainly a form that I used, and I'm—I will tell you, I'm confident I wrote that, but I would like to comment on it if I can.

The White House asked me, whenever someone used the President's box, to report back to them the name. In other words, the White House might call and say, we have two tickets for tomorrow night's performance; would you like them? And I would then go to different departments at the DNC, maybe the Chairman's office or Political or Finance, and say, listen, we've got two tickets, and if somebody can use them, let me know. And then somebody might come back to my office or call me on the inside line and say, okay, we can use them.

Let's take, for example, Political would say, yep, we can use the two tickets; and I'd say, great, and I'd get the two tickets and I'd provide them to the person in Polit-

ical Affairs, DNC Political Affairs. And when I handed them the tickets, I would say, here are the tickets, here is the information on the show, but you need to provide back to me the name of the person who's using the tickets; and they would say, fine, and then after the fact, or on the day of the fact or whatever, they would say, okay, this is the name of the person we've given the tickets to.

So, I do see this, I did write this memo, I'm confident I did because it's that, but I didn't do anything other than provide two tickets to a staff person at the DNC, who did their job and reported back to me the name of the person who used the tickets.

Mr. BEST. When, in September of 1995, did you leave the DNC?

The WITNESS. And I left right around that date. I actually was hired sometime in mid- to late-September, and I don't recall the exact date; but I think it was around the 20th of September that I was hired by the Democratic Governors Association, and I actually started working there the next week.

Mr. BEST. So the record is clear, the memorandum which is EOP 051237 is dated September 15th, 1995.

EXAMINATION BY MR. WILSON:

Question. When you received indication that there were tickets for an event, did you have a usual method of letting other people in the DNC know that you had those tickets?

Answer. Yeah, I'd send out a memo or an e-mail. I might e-mail department heads and say, I've been contacted by the White House, and I have two tickets for—using this example, two tickets for tomorrow night's performance of something, of the National Symphony Orchestra; if you would like the tickets, if you can use the tickets, please contact me.

Question. And how did you decide who would end up getting the tickets?

Answer. Well, it was always first come, first served. If somebody raced down and said, we definitely have somebody who wants them, I'd say, that's great, here are the tickets; or I'll get the tickets sent over, and I'll get them to you.

Question. Did Susan Lavine ever discuss with you being on the permanent admit list to Charlie Trie's Watergate apartment?

Answer. No.

Question. Were you aware during the time that you were Director of NMS that she was on the permanent admit list to Mr. Trie's Watergate apartment?

Answer. No, I was not while I was Director. And, in fact, I will tell you, I did not know that until you just told me that. Nor did I even know Charlie Trie had a corporate apartment at—where did you say, the Watergate Hotel?

Question. Watergate.

Answer. I was not aware of that until just this moment.

Question. Do you know Pauline Kanchanalak?

Answer. I have met her before.

Question. Where did you meet her?

Answer. I met her at—I don't recall the exact—the specific function, but I know I met her while I was fund-raising for the DNC.

Question. Did you ever have any conversations with her when you were the Director of the National Membership Services?

Answer. I may have. I—I don't recall specifically whether I did or not.

Question. Did you ever arrange introductions for Ms. Kanchanalak to meet administration officials?

Answer. Again, not that I recall specifically. I don't believe that I made a phone call on her behalf. I really didn't know—I mean, I met her, but I didn't really know her.

Question. Do you have any general recollections of requests made by Ms. Kanchanalak to meet with administration officials?

Answer. Can I have a moment?

Question. Sure.

[Witness confers with counsel.]

The WITNESS. I don't recall.

EXAMINATION BY MR. WILSON:

Question. Did Ms. Kanchanalak ever ask you to assist her in any way?

Answer. No, the only time I spoke to her, again, was just at some event prior to my days before National Membership Services.

Mr. WILSON. Providing the witness with a document. It appears to be a memorandum to Mr. Sildon from Luren Supina. If you would take a moment and review the document.

The WITNESS. Okay. I see this document.

EXAMINATION BY MR. WILSON:

Question. Do you recall Ms. Kanchanalak's name coming up in relationship to the Bureau of Labor Statistics?

Answer. I see it here. It does not refresh my recollection.

I also will indicate that despite the fact that Luren Supina says in her memorandum that Pauline Kanchanalak mentioned that she's working with me, if you'll notice, the handwritten notes down below indicate that I was not speaking with Pauline; I was speaking with someone on her staff who never sent a request over in writing and, therefore, I never provided it.

On September 9th, I indicated if she wanted me to try to do anything, she would need to send it over in writing; and on the 15th, I called to say we discussed this a week ago and I don't have any written information. The assistant indicated that he wasn't going to put the request on paper, and I indicated that I'm not proceeding ahead with it. And I do see it here, but I don't recall it.

Question. Do you know whose handwriting this is?

Mr. BEST. Where?

The WITNESS. Where?

Mr. WILSON. On the document.

The WITNESS. The handwriting below the line and, for sure, the handwriting where it says "9/8" is mine.

EXAMINATION BY MR. WILSON:

Question. Do you know, I'll work from the top of the document down. There's a telephone number written right next to Ms. Kanchanalak's name on the "re:" line. Do you know whose handwriting that is?

Answer. I know this may sound interesting, but it may be my handwriting, but I'm really not certain. It looks like it has the potential it could be mine, but it looks like either I was writing quick or somebody else wrote that. That doesn't really look like my handwriting.

But from "9/8" down, I would say that's probably my handwriting and certain—"9/9" and "9/15," that is certainly my handwriting. But again, even though I see it here, it doesn't refresh my memory.

Question. Do you recall whether you made any contacts with other DNC employees about this general subject matter?

Answer. You mean this specific request?

Question. The mention in the memo, yes.

Answer. I mean, I may have discussed it with Luren Supina who sent the memorandum to me.

Mr. BEST. Do you have a recollection of that?

The WITNESS. But I don't recall that.

EXAMINATION BY MR. WILSON:

Question. What was Ms. Supina's position at the time the memo was drafted?

Answer. Luren was the director of a program that was called something to the effect of the Women's Leadership Forum; they changed names during the course of that period of time that I was Director of National Membership Services, but she was essentially—that's a donor council within the DNC, and she was—she had gotten it up and running and was its Director, or whatever the title may be, but she ran the council.

Question. Do you know why she would have directed this memo to your attention?

Answer. Again, because as Director of National Membership Services, I think she was hoping that I could—I don't know why she——

Mr. BEST. Do you know?

The WITNESS. No, I don't know why she sent me the memo.

EXAMINATION BY MR. WILSON:

Question. Do you recall having any conversations with any employees of the Bureau of Labor Statistics in 1994?

Answer. No.

Question. Were you aware at the time that Ms. Kanchanalak expressed an interest in being invited to a lunch at which the Queen of Thailand was also in attendance?

Answer. I have a vague recollection of that.

Question. Did Ms. Kanchanalak contact you directly about this event?

Answer. I don't believe she did.

Question. Do you recall whether she contacted anybody else in your office about the Queen of Thailand lunch?

Answer. I really don't recall. I just don't recall.

Question. Do you know whether you ever helped to arrange for Ms. Kanchanalak to meet with any administration officials at the time you were Director of Membership Services?

Answer. I don't recall.

Question. Do you recall whether you helped Ms. Kanchanalak to meet with any administration officials at the time that you were Regional Finance Director?

Answer. No, I would not have done that.

Question. Were you aware at the time that you were Director of NMS that Ms. Kanchanalak was a financial contributor to the DNC?

Answer. Yes, I knew that she was a contributor.

Question. Did you know whether or not she was—she herself was making contributions to the DNC?

Answer. I did not know the source of the contribution.

Question. Was it your understanding at the time that she was making—she was, herself, making contributions to the DNC?

Answer. Well, it's not something that I ever would have thought about. You know, some people are members of our Donor Council because they raise a lot of money and they never write a check themselves. So I don't look at people and figure out, who is a raiser and who is a writer; they're a member of the Donor Council. I had no reason to assume that either she did write checks or she didn't write checks, or that she raised—it just wasn't a factor, and particularly when I was a Director of National Membership Services, I didn't care about the money. I just wasn't focused on that.

Question. Do you know John Huang?

Answer. I have met John Huang. But I met John Huang after I left the DNC.

Question. When did you meet Mr. Huang?

Answer. When I was working for the Democratic Governors Association in 1996.

Question. Did you at any time speak to Mr. Huang when you were the Director of NMS?

Answer. I did not.

Question. Are you aware of any arrangements made by any of your colleagues at NMS on behalf of Mr. Huang?

Answer. I—I'm not aware of it, no.

Question. Do you know whether any of your colleagues at NMS spoke directly with Mr. Huang?

Answer. I can't—I can't speculate on what my colleagues at NMS did, whether or not they talked to him.

Question. But you have no recollection or knowledge of whether they did or did not?

Answer. That's correct.

Mr. BEST. You understand that Mr. Huang did not become an employee of the DNC until after the witness left the DNC, and so you may be asking him about conversations, if any, that took place after his employment at the DNC?

Mr. WILSON. Right. I do understand that.

EXAMINATION BY MR. WILSON:

Question. Are you aware of either your colleagues or anybody at the DNC making any arrangements on behalf of Mr. Huang to visit the White House or meet with anybody at the White House?

Answer. No, I'm not aware.

Question. Are you aware of any requests made either to yourself or colleagues at the NMS on behalf of the Riady family?

Answer. No.

Question. Specifically are you aware of any requests made on behalf of James Riady?

Answer. No.

Question. Are you aware of any requests to either visit the White House or meet with any government official on behalf of Mr. Mochtar Riady?

Answer. No.

Question. Do you have any knowledge of whether anyone suggested that the Riady family be invited or any members of the Riady family be invited to the White House?

Answer. Can you read the question again?

[The reporter read back as requested.]

The WITNESS. No.

EXAMINATION BY MR. WILSON:

Question. Do you know what the TRULIST was, spelled T-R-U-L-I-S-T?

Answer. No.

Mr. WILSON. I'm providing the witness with a document that is titled at the top DNC Finance Executive Summary dated 7/26/94. And the record can reflect, this does not indicate that Mr. Sildon's name appears at all on this document.

There is a handwritten notation at the bottom deleted from TRULIST, 7/26/94.

EXAMINATION BY MR. WILSON:

Question. Does this provide any additional assistance to your being able to recall what the TRULIST is?

Answer. It doesn't. I don't recognize that at all. And again, I was not a member of the Finance staff in July of '94, so it could be something that was—that they were aware of. I'm not. I don't know what that is.

Question. Do you know why Mr. Huang was invited to attend the state ceremony for the arrival of Boris Yeltsin in 1994?

Answer. No, I really don't.

Mr. WILSON. I'm providing the witness with a document that's a memorandum to State Arrival Coordinating Committee from Mr. Sildon, and it lists Mr. Huang as an individual who did not pick up tickets for the state arrival ceremony for Boris Yeltsin.

Mr. BEST. So the record's entirely clear, Mr. Huang's name is one among something like 50 names on a list on this document, which is F 0013666.

EXAMINATION BY MR. WILSON:

Question. Do you recall receiving a list of potential invitees to the state arrival ceremony for Boris Yeltsin?

Answer. Well, I need to explain how this works, and I think this is important to do.

The White House would invite literally somewhere between 6- and 10,000 people to the South Lawn to watch an arrival ceremony, including members of the public, but you actually had to have a ticket to get onto the grounds.

As the Director of Membership Service, I was the one responsible for sending a memo to all departments at the DNC saying, we have X number of tickets, which usually was 300 or more, to be among the 6-, 8-, 10,000 people on the South Lawn to attend an arrival ceremony. It's not like you're up close; you're just on the lawn.

And I would offer to all department heads the opportunity to provide me with some certain amount of names, and usually it was divided evenly; Political could have 50 names and Finance could have 50 names and the Chairman's office; and everybody could have whatever the appropriate number was, and all they had to do was simply give me a name, date of birth and Social Security number. And I provide that to the White House, and they do their own background check with the Secret Service to make sure that the person could get on the lawn which they would fill out with the person's name. So I get a list back for Robert Clay, Joan Coplan, Elizabeth Dozoretz and Paul Equale—I would get a list with 300 names on it, and then people could come over to the DNC and collect their ticket.

I simply have sent this memo to the State Arrival Coordinating Committee. All those names in the upper right are people who are heads of departments at the DNC so you can see it went to literally like 10 or 12 different departments at the DNC saying—I don't even know who gave me these names; I am going to tell you, all the names didn't get their tickets, so if you happen to recognize their names, you can do whatever you need to do, but we have a ticket downstairs in the lobby, approved by the Secret Service that they are not a security risk, that they can be one of 6-, 8-, 10,000 people on the South Lawn. That's what this memo is.

So I see here that John Huang's name's on there, but as my counsel pointed out, he is one of 50 names. Don Fowler, before he was Chairman of the committee, is one of the people whose name's on here. I didn't even know Don Fowler in 1994. He was some gentleman from South Carolina, and I didn't pick up his ticket. I didn't know how to get in touch with Don Fowler.

I appreciate that John Huang's name's on this memo, but that is because I'm going through a list and seeing it on a list and going through the memo.

Mr. BEST. Half of humanity is on this list.

EXAMINATION BY MR. WILSON:

Question. What was the State Arrival Coordinating Committee?

Answer. That's just a name made up for the people in the DNC for who is going to be the liaison from Communications and from Political Affairs, and then the state chairs, and——

Question. You mentioned earlier that you might have as many as 300 tickets to allocate. Would you send over a list to the White House of all of the DNC invitees?

Answer. Yes, because the White House had to run—as I previously stated, the White House had to run that list through Secret Service, checking out their date—I had to provide to the White House their name, date of birth and Social Security of the people that we wanted to have fill those slots; and this was really one of the only times where the White House would say you get this many slots and that many people can go.

We previously talked about dinners. It's not that I had a slot for a dinner; they'd just say, provide a name and we'll see whether they fit in. But for arrival ceremonies, when Boy Scouts would come and out-of-town guests would come, they said, look, we are going to print 6,000 tickets and you can have 300 of them.

Question. Did the White House ever reject any of the suggestions that you sent over to them?

Answer. Not that I'm aware of.

Mr. BEST. Is there a difference between rejecting and not giving a ticket to?

EXAMINATION BY MR. WILSON:

Question. Yes, I'm specifically asking, did you ever get an indication, call, memorandum back saying, you have indicated that you want so-and-so invited, and we do not want that person invited?

Answer. Not that I recall.

Question. Did you generally prepare a memorandum indicating who had not picked up tickets for large events that had multiple tickets to be given out to people?

Answer. Well, I actually think that I stopped doing the memorandum because, as you can see, a fourth of the list doesn't pick up their tickets, you know. And so after a while, people didn't really care.

They wanted to offer someone—people in the DNC didn't care if someone did or didn't pick up their ticket. If they offered a ticket to Joe Smith, as far as the person in the Office of Political Affairs of the DNC's concerned, that's good enough. They've offered Joe the ticket. If Joe doesn't pick it up, Joe doesn't pick it up, but he had a chance to go.

So I stopped writing these memos because nobody cared about the information. It wound up being a waste of my time.

Mr. WILSON. I'll mark this document as Exhibit ES–1 and submit that for inclusion in the record.

[Sildon Deposition Exhibit No. ES–1 was marked for identification.]

[Note.—All exhibits referred to can be found at end of deposition.]

EXAMINATION BY MR. WILSON:

Question. Do you know Mr. Johnny Chung?

Answer. I do.

Question. Where did you first meet Mr. Chung?

Answer. He was introduced to me at some point by someone on the finance staff. I met him after I became director of National Membership Services.

Question. Did you meet him on more than one occasion?

Answer. After I initially met him, I did see him on other occasions.

Question. Approximately how many times would you have met him?

Answer. He would just show up at the DNC, so I would say probably half a dozen times, give or take one or two. But, you know, approximately half a dozen times.

Question. Did Mr. Chung ever telephone you?

Answer. Yes.

Question. Approximately how many times did he call you?

Answer. I couldn't recall with certainty, but approximately the same number of times.

Question. And why did he call you?

Answer. Well, I—I—he had a variety of requests.

Question. If you could, be a little bit more specific on the types of requests and the specific requests that he made of you.

Answer. Well, let me say I don't recall why he called me every time. I do recall at least one specific time and, candidly, I—I recall it and it has been further reinforced by all the news articles that have been about a particular time.

He—he went to a White House radio address that I was not responsible for submitting his name for. I did not even know he went to the address until he called me to say, last week I got to go to the radio address, and I really would like to get—and my picture was taken with the President, and I had a few friends there, and their pictures were taken with the President; can you help me get the pictures?

This was—this was not highly unusual that someone who goes to a radio address gets their picture taken with the President, little kids, basically if you're in the room, the President if he has time will shake everyone's hand and you get your picture taken or maybe you brought your own camera. Usually a picture is taken.

So I called over to the White House in response to a phone call I got from Mr. Chung asking for his photos.

Question. Do you recall when that was?

Answer. The only reason I recall it is because I've read in the newspapers approximately the date, and that was March of 1995.

Mr. WILSON. Providing the witness with a document, it is a—this is a letter to Mr. Sildon from Johnny Chung dated February 27, 1995.

EXAMINATION BY MR. WILSON:

Question. Do you recall receiving this letter?

Answer. I actually do recall receiving this. Can I tell you why I recall it?

Question. Absolutely.

Answer. Because it was one of the most preposterous letters I had ever received in my life. Somebody just calls me and says, I want to meet with the President and the Vice President. You know, I had never seen anybody who thought that all they had to do was send a letter and then they could meet with the President. I have never arranged a meeting with the President, so I also thought it was, I mean, with all due respect, a little laughable, that somebody would send me a letter thinking I could just pick up the phone and arrange a meeting with the President on his behalf, regardless of the merit of whether or not such a meeting should occur.

Question. What did you do after you received this letter?

Answer. Well, I believe I did not move very hard—very—I was not very active to pursue these requests. It is possible that—first of all, I know that I talked to Martha Phipps, who was my supervisor, and showed it to her. I may have talked to others about it. And I believe that I probably tried to get him a tour of the White House, and it is—anything else beyond that point I don't particularly recall.

Question. Do you recall whether you replied in writing to him?

Answer. I would be very surprised if I replied in writing, because I seldom had time to do my job as it was, let alone take time to sit down and write letters to people who contact me. Plus, again, just I can't imagine I would have considered it a very serious request.

Question. Did you discuss this request with anybody else at the DNC?

Answer. Besides Martha Phipps, who I previously mentioned?

Question. Yes.

Answer. I may have. I don't recall.

Question. Do you recall receiving other faxes or letters from Mr. Chung?

Answer. If you have something to show me, I would be happy to respond to it. I don't particularly recall whether or not he sent another fax as a follow-up to this or any other kind of request.

Question. You discussed earlier the Presidential radio address and photographs that were taken at the address. Did you know in advance of the radio address who Mr. Chung's guests were?

Answer. No. Are you talking about these business leaders from China, as he describes in this letter?

Question. Actually, I have moved from this. I am not referring to this document at all at this point.

Answer. Okay.

Mr. BEST. There is a problem with your question because he does not know of the radio address until after the event when Mr. Chung calls him and seeks the photographs. Implicit in your question is that he had some knowledge prior to the radio address, and he has already testified the first thing that he knows about it is subsequent to the event when Mr. Chung calls him.

Mr. WILSON. Actually, just to clarify that for myself.

EXAMINATION BY MR. WILSON:

Question. Short of going back, was the first time you knew of the photographs and the radio address after the actual event?

Answer. Yes.

Question. Were you made aware, when you did learn about the event, of who the guests of Mr. Chung were?

Answer. No. And I actually even today don't know who they are, other than having read in newspaper articles within the last few months.

Now—you know, I did not know who these people were; basically still don't. I couldn't tell you today what any of those people do and if they are from China; I couldn't tell you what they do right now even having read the newspaper articles. I don't know who these people are.

Question. Did Mr. Chung request directly of you to get help to get the photographs from the White House?

Answer. Yes.

Question. And how did he do that?

Answer. He called me. He either called me or stopped by my office. That, I don't specifically recall. But I do know that he issued the request.

Question. And what did he tell you at that time?

Answer. It was just—he made it sound very innocuous. He had been to a radio address and pictures were taken, could I help him obtain the picture. It sounded at the time innocuous to me because that's—as I indicated before, that's standard practice, if you go to a—not standard but pretty common practice, if you go to a—if you go to a radio address, you can get your picture taken.

Question. And what did you do?

Answer. I called over to the White House to see if we could help him get his pictures.

Question. And what were you told?

Answer. After somebody said that they would check on it, they called me back and they said that those pictures wouldn't be made available.

Question. Did they give you a reason why they wouldn't be made available?

Answer. They did. They—I actually do recall this because it's the first and only time it has been told to me. They said, the pictures aren't available because the President doesn't want them released and the National Security Council is—does not believe they should be released to him. They are concerned about his guests.

Question. And who told you this?

Answer. I don't recall. It was someone in the President's personal office.

The reason I don't recall is there were two different staff people I would often call for these kinds of requests, something that happened like a radio address with the President. I just don't remember which staff person it was.

Question. And when they told you this, what did you do next?

Answer. I immediately told Johnny that I was not going to be able to get his pictures, that the National Security Council was uncomfortable with him having those pictures.

Question. What did he say?

Answer. I don't recall what he said, but it didn't matter to me because I disengaged at that point. I figured if the NSC—I wasn't asking questions. It wasn't my situation. I didn't put him in the radio address. I was doing my job trying to resolve a constituent request. The request was to have photos. The National Security Council said he shouldn't have these photos. That was good enough for me. I provided the answer. I considered that as a closed issue and I disengaged.

Question. Did Mr. Chung make any further requests of you about these photographs?

Answer. He did not. And I assumed he did not get his photos.

Question. Were you aware at any time before the—were you aware at any time in 1995, at the time you were director of National Membership Services, that Mr. Chung had been described as a quote, hustler, unquote?

Answer. No.

Mr. BEST. He is asking—okay. You have answered it.

Mr. WILSON. I will provide the witness with a document which has been premarked E0P 005439, which it is indicated that the sender was a Mr. Robert L. Suettinger.

Mr. LU. For the record, this document, so the record is clear, this document was produced by the White House.

EXAMINATION BY MR. WILSON:

Question. Have you ever seen this document?

Answer. No.

Question. Do you know if Mr. Chung was ever solicited regarding debts from White House Christmas parties?

Answer. I don't know.

Question. Do you know, and this is returning to the subject we were discussing a moment ago, the radio address photographs, do you know whether anybody else at the DNC made any requests to the White House for Mr. Chung to get his photographs?

Answer. I am sorry, can you repeat that question? I was reading this document. I apologize.

Question. Sure. Do you know of anybody else at the DNC who made requests for Mr. Chung to get the photographs that were taken at the radio address?

Answer. Just because I want to be able to answer your question, I apologize for doing this. I need you to read it back one more time.

[The reporter read back as requested.]

The WITNESS. I do not.

Thank you. I am sorry. I just wanted to make sure I understood the question.

I do not.

EXAMINATION BY MR. WILSON:

Question. Did you have any conversations with anybody else at the DNC about Mr. Chung's desire to get the radio address photographs?

Answer. I did. I know I talked to Richard Sullivan, and I believe at the time he was deputy finance director, eventually became finance director, but I don't think at that time he was. And I also talked to—I believe I talked to Carol Khare, who was the chief of staff in the chairman's office. She ran the chairman's office. Again, that's to whom I reported to as my supervisor, just to bring them both up to date, particularly Richard, because he was the first person who had kind of been the connection for Johnny Chung to the DNC. In other words, when you make an initial contribution, you are a member of a donor council which was the head at one point of the Business Leadership Forum. Mr. Chung was a member of that donor council. So I always assumed Richard to be a staff contact.

Question. What did Mr. Sullivan tell you when you explained the situation?

Answer. I really don't recall. I mean, I—you know, I provided the information. Johnny Chung called me. I made a phone call. I got an answer that I felt was good enough for me. I passed that information along. I just wanted to make the two of them aware of the situation. I wasn't looking for any kind of response back from them. If they gave me one, I don't recall.

Question. Why did you call Ms. Khare?

Answer. Because she was my supervisor.

Question. Do you know Roger Tamraz?

Answer. No.

Question. Have you ever spoken with Mr. Tamraz?

Answer. No.

Question. Apart from subsequent media accounts, did you at the time that you were the director of NMS, did you know of anybody else at the DNC attempting to arrange introductions for Mr. Tamraz to meet administration officials?

Answer. No.

Question. Had you ever heard the name "Roger Tamraz" when you were at NMS?

Answer. Not that I recall.

Question. Had you ever heard the name "Eric Hotung" when you were at NMS?

Answer. No.

Question. Had you ever heard the name "James Riady" when you were director of NMS?

Answer. Well, I don't recall. Because I have heard his name so often recently in the news, I don't recall if I had heard it before, but I don't believe so.

Question. Do you know whether Mr. James Riady made any requests of you or your colleagues at NMS?

Mr. BEST. You have already asked him earlier if he had ever spoken with Mr. Riady. Now you are coming back around to the same——

Mr. WILSON. With his colleagues, correct.

The WITNESS. Prior to this conversation today, prior to this deposition, I was not aware of that. Based on information you told me earlier in this deposition, I would say now obviously I am aware of that, but prior to today, during my time at the National Membership Services, as director of the program, I was not aware of him having any kind of direct contact with my colleagues on my staff.

Mr. BEST. Riady, are you talking about? Was that your question?

Mr. WILSON. It was my question, and there might be clarification in order there.
Mr. BEST. I don't believe you have made any assertion of a prior contact.
Mr. WILSON. I don't believe I have, either.
The WITNESS. I apologize.
Mr. WILSON. I don't believe I have, either.
The WITNESS. I apologize. In just recalling what we spoke about earlier today——
Mr. WILSON. Mr. Trie.
The WITNESS. It was Charlie Trie and I was thinking James Riady. I don't have any reason to know that James Riady had any conversation with any people on my staff. I apologize about that confusion.

EXAMINATION BY MR. WILSON:

Question. Is your answer the same for Mochtar Riady?
Answer. Yes.
Question. Do you know, either or both, Arief or Soraya Wiriadinata?
Answer. Again, I have no recollection of that name.
Question. Do you recall hearing the name "Wiriadinata" when you were director of NMS?
Answer. No.
Mr. BEST. Since the first contributions were made by the Wiriadinatas after this gentleman left the DNC, it is most unlikely that he would have heard of them.
Mr. WILSON. Well, that's something I don't know and presumably that's something that you don't know. I think it has to be determined.

EXAMINATION BY MR. WILSON:

Question. Have you ever heard anybody discuss whether Arief Wiriadinata attended a movie at the White House?
Answer. No.
Question. Do you know Yogesh Ghandi?
Answer. I have heard the name in recent news reports. I had not heard the name prior to reading them in Washington Post news stories during the course of this spring and summer, 1997.
Mr. LU. Again, I would just make the same point that Mr. Best made, which is, that Mr. Ghandi's contributions to the DNC came after Mr. Sildon left the DNC.
Mr. WILSON. Could I just ask for a clarification?
Mr. LU. Yes.
Mr. WILSON. I am just wondering how that has any bearing on my question as to whether he has ever heard the name before.
Mr. LU. It is just not clear to me why he would have heard the name if Mr. Ghandi's involvement with the DNC came after he left.
Mr. WILSON. He might have met him.
Mr. BALLEN. He might have met anyone in the world. Are you going to ask him everybody in the phone book?
Mr. WILSON. That's why I am asking the question.
Mr. BALLEN. This deposition—I am going to say something. This deposition has gone on twice the length of time than a much more prominent person. There has to be some reasonableness to the questions that have to relate to knowledge the witness reasonably could have. You could ask the witness does he know about Mount Vesuvius if you want, but you have to conduct a deposition that is fair to the witness and we are going on and on and on with no end in sight. That's the purpose. That's the clarification.
Mr. BEST. Let me say this for the record: We want to give you every opportunity to ask reasonable questions, but I certainly know, and I would have thought that you would know, that in the first instance the Wiriadinatas first make their first contributions to the Democratic National Committee in November of 1995, and after this witness has left the Democratic National Committee and Yogesh K. Ghandi makes his contribution in May of 1996, almost a year before this—after this witness has left the Democratic National Committee. That clearly still leaves open the question whether or not he knew these people prior to the time that they made the contribution, so that there is a basis for you to ask the question. But the likelihood that he would know them is so improbable under all of these circumstances that given the length of this deposition I object, so that the record is clear, to the questions as they are going on. You are just trolling for information at this point.
Mr. WILSON. Well, at the extent of drawing this out even further, when individuals make contributions in excess of $300,000 as their first contribution, it is not out of the realms of possibility that somebody has met them, heard of them, come across them, seen them, sometime within the past 1-year period. I mean, that's just

my common sense, which obviously from your perspective is not very common. But it is a simple one-line question that could have been answered no and we could have continued on to the next phrase. That's all I am interested in.

Mr. BEST. That's always the response when you point out the improbability of the question, that you are wasting more time with the objection. But you have got to make the objection so as to perhaps bring this back to a sense of reality. But go ahead. Go ahead with your questions.

EXAMINATION BY MR. WILSON:

Question. Are you aware that the President attended a series of coffees held at the White House during 1995 and 1996?

Answer. Only because I have read about them in the newspaper.

Question. Did you know of the coffees at the time that you were director of NMS?

Mr. BEST. When you say "coffees" now, you must understand that there were a whole raft of coffees at the White House, some sponsored by the Democratic National Committee, according to the facts as I know them, some by the Clinton/Gore campaign and by other organizations as well. So when you say "coffees," are you only referring to those sponsored by the Democratic National Committee or generally coffees with a whole group of other sponsors as well?

Mr. WILSON. I was being inclusive.

The WITNESS. That occurred in 1996?

EXAMINATION BY MR. WILSON:

Question. 1995 and 1996.

Answer. I was not aware of those coffees occurring while I was in my role as director of National Membership Services.

Question. Did you have any knowledge at the time you were director of NMS that the DNC was paying for the costs of coffees held at the White House during 1995?

Mr. BEST. You mean reimbursing for costs?

Mr. WILSON. Correct.

The WITNESS. Well, I wasn't aware of that. Again, I wasn't on the fund-raising staff and wasn't—I had nothing to do with the coffees so I wouldn't know about any of the other aspects.

EXAMINATION BY MR. WILSON:

Question. Did you on any occasion, when you were director of NMS, see any memoranda or spreadsheets that alluded to any financial returns from coffees that were held at the White House?

Answer. No.

Mr. BEST. See what a good no does for you.

EXAMINATION BY MR. WILSON:

Question. Did you ever have any interaction with Harold Ickes?

Answer. No.

Question. Have you met Mr. Ickes?

Answer. I have met him.

Question. When have you—when did you first meet Mr. Ickes?

Answer. Again, I don't recall specifically when I met him, but—and it could have been in either role. You know, you meet someone and then you know you have met them. I can't tell you now, 4 years later, tell you while I was fund-raising or while I was director of Membership Services, but I had some occasion to meet him.

Question. Did Mr. Ickes ever call you when you were the director of NMS?

Answer. No.

Question. Did you ever call Mr. Ickes when you were director of NMS?

Answer. No.

Question. Do you ever recall Mr. Ickes contacting one of your NMS colleagues directly?

Answer. No.

Question. Do you ever recall one of your NMS colleagues contacting Mr. Ickes directly?

Answer. No.

Question. Did you ever discuss—did you ever have any discussions with colleagues at the DNC about contributions or donations to tax-exempt organizations?

Mr. LU. While he was a fund-raiser or while he was with NMS?

Mr. WILSON. Ever.

Mr. LU. Ever? Okay.

The WITNESS. I am sorry. Would you repeat the question?
Mr. WILSON. Could you repeat the question, please.
[The reporter read back as requested.]
The WITNESS. No.

EXAMINATION BY MR. WILSON:

Question. Did the NMS office collect or have any information about tax-exempt voter registration organizations?
Answer. No.
Question. Do you know what the arts project was?
Answer. I don't, based on that title. I mean, if you have a document that might refresh my memory, I would be happy to look at it. I mean, is that an official title or is that just a term of art?
Question. There is no mystery. I don't know, either. So I am asking you.
Answer. Okay.
Question. It appears to be a term of art, and if you don't know, you don't know.
Mr. LU. Counsel, if we are at a breaking point now——
Mr. WILSON. Actually, you will be very happy to know that I have two questions and I am happy to take a break.
Mr. BEST. No, I am perfectly happy.
Mr. WILSON. I will soldier on.
Mr. BEST. March.
Mr. LU. Please.
The WITNESS. I am not aware of a project officially called the arts project.

EXAMINATION BY MR. WILSON:

Question. Do you have any knowledge of whether anyone at the DNC, at the time you were regional finance director or the time you were director of NMS, provided a list of Chinese American trustees to anyone at the Taiwan Economic and Cultural Representative Office in the U.S.?
Answer. I am sorry. Can you repeat the question?
[The reporter read back as requested.]
The WITNESS. I do not.

EXAMINATION BY MR. WILSON:

Question. Have you ever heard the name "Andrew Shi," S-H-I?
Answer. No.
Mr. WILSON. That concludes my round of questioning.
If you would like to take a break before yours, I would be happy to.
Mr. LU. No. I would just as soon we wrap up.
The WITNESS. Good.

EXAMINATION BY MR. LU:

Question. Mr. Sildon, thank you for coming today. On behalf of the Democratic members of the committee, I would like to thank you. I know this has been an imposition on you and your time, and I will try to keep my questions reasonably brief.
Answer. Thank you.
Question. And we will wrap this up.
Answer. Thank you.
Question. As I understand your testimony, one of your goals in setting up NMS was to separate these services from the finance department; isn't that correct?
Answer. That is correct.
Question. In fact, I believe you have testified that you did not want these services to be—or decisions about how these services were to be provided to be based on the amount of money that a supporter had contributed; isn't that correct?
Answer. That is correct.
Question. And, in fact, when the supporter called your office asking for assistance or asking for a tour to be arranged, you didn't check first to see how much money that supporter had given.
Answer. Correct.
Question. In fact, I believe you testified that you did not even have access to that type of financial information.
Answer. That's also correct.
Question. And I believe, if my understanding is correct, that's why throughout this deposition you have been using the term "supporter" or "constituent" as opposed to "contributor" when you talk about the type of services that your office provides.

Answer. That's correct.

Question. Isn't it true that the arrangements your office made for supporters were similar to the types of services that a Congressman or Senator's office would make for his or her constituents?

Answer. I had worked on the Hill for 7 years. I understood about constituent service. You don't—you don't ask someone when they call a Member of Congress' office if they made a contribution to a recent campaign or election. I just—if people need help, I want to try to provide it.

If someone contacted me, that's correct, I tried to simply take the request and fulfill it regardless or irregardless of other factors, such as contributions.

Question. And would I be correct in guessing that the Republican National Committee probably provides the same types of services that the DNC or Congressman or Senator's office also provides for its supporters?

Answer. That's not only correct but a lot of the impetus for starting a program like this was because they had done that as well, and they had paved the way and we understood that those kinds of opportunities existed and had been done so in the past.

Question. And when you say that they paved the way, can you elaborate for me on what types of services you are aware of that the RNC provided for its supporters?

Answer. I had seen a brochure of a group called Team 100 and the Eagles, which talked about all of these opportunities people would have, you know, with the President and, you know, be it tours or going to events. I was simply interested in moving this away from the finance division of the DNC and being responsive to people just as previous—previous—previously had been done by the RNC.

Question. Just so the record is clear, when you were talking about Team 100 and the Eagles have access to the President, you meant President Bush or President Reagan?

Answer. Correct. Correct. And I had seen that in brochures that the RNC had put out.

Question. Can you recall any other types of, for lack of a better word, perks that were available that the RNC provided to its supporters that you read about in those brochures?

Answer. Well, I really don't recall others that they offered that we didn't offer or vice versa. They were very different administrations, you know, with different staff and a different President. It just—it was trying to respond to the fact that we now were looking for ways to be responsive to our constituents, just as the RNC had always been, just as when I worked on Capitol Hill when a constituent contacted a Member's office and they wanted information or to be pointed in the right direction.

You know, this program, everybody keeps talking about this program, and I won't belabor this point, but everybody keeps talking about this program that we were putting people in radio addresses and doing these other things. We were doing things like helping an out-of-towner figuring out what is a good Italian restaurant to go to in Washington or what is something interesting so their kids won't be bored all weekend long when they come to town or what is appropriate for a 5-year-old to do versus a teenager to do.

Our program did so much more than just radio addresses and putting people in South Lawn events, as we discussed this morning. Our program was to try to be responsive to anyone. We were the catchall when somebody called the DNC; nobody knew who to turn to, let's have them be able to talk to National Membership Services. Maybe they will have an idea for them.

We have got a list of 50 fun things to do in Washington, D.C., that we could send any constituent who called. It didn't matter if they wrote a $100,000 check or, you know, they were just some little old man out in the Midwest who was coming to Washington for the first time.

That's why we started the program and I did not want it to be tied to money. That's why I left the finance department. That's specifically the reason why I talked to the chairman and, as I previously testified, to Martha Phipps and to my former boss, Nancy Jacobson, and we decided to move it out of the department, because it didn't have to do with money. And we didn't want there to be this perception that we were telling people where to eat or trying to help them get a tour at the White House simply because they wrote a check.

Question. And I don't mean to belittle the work your office did, but it sounds as if a lot of the services your office provided were similar to what perhaps a hotel concierge would provide.

Answer. Exactly right.

Question. Let me just go back for another second or to the discussion we just had about the RNC's services. Would it surprise you if I told you that the RNC had spe-

cial briefings for administration, Bush administration briefings, for its large contributors?

Answer. It doesn't surprise me because I know it happened.

Question. Do you know a specific example in which that happened?

Answer. Well, I have knowledge from my days when I was a lobbyist for the National Federation of Independent Business that I would go to White House briefings on the fourth floor of the OEOB when, you know, the—I mean, there was one time when President Bush himself came, but where they would have, you know, somebody from the—you know, Carla Hills was at one of the briefings, and I just—you know, that's what they did. They held briefings, and I sat in those briefings when I was a lobbyist, and I also knew from people who were supporters of the DNC, who would, you know, look, a lot of these people are interested on both sides. So they—you know, they supported the RNC and they supported the DNC and they would come say to us, look over at the RNC, they are doing all of these things for us; you guys have got to get on the ball; you guys need to be responsive to our interests as well.

Question. And would it surprise you if I told you that the RNC had staff members who also arranged services or performed services, made arrangements for its large contributors or arranged meetings with Members of Congress?

Answer. It would not surprise me.

Question. Did your office ever provide services to a supporter so that supporter might encourage foreign nationals to contribute money?

Answer. Absolutely not. In fact, I knew that was illegal anyway, so we certainly wouldn't have done anything for those reasons.

Question. And to your knowledge was there ever any communication or any hints from the President or the Vice President that the DNC should use their office in that way to encourage foreign nationals to give contributions?

Answer. No. And to follow up on something you said a minute ago, and I don't think it belittles the program either, I doubt the President or the Vice President even knew our little shop existed. We were there to provide constituent service to all kinds of people. I am pretty certain they did not know that this little shop of three people was over at the DNC helping people figure out a good restaurant to go to or who should come to the South Lawn along with 6,000 other people to see Boris Yeltsin shake the President's hand.

Question. At the time your office made tour arrangements and provided other services, we have talked about Charlie Trie today, Johnny Chung, Pauline Kanchanalak, had there been any news stories, media accounts about them?

Answer. No.

Question. Can you estimate for me the number of requests for all types of services that your office received during the time that you worked there? Would it be fair to say it was thousands?

Answer. Yes. Which is part of the reason I have a difficult time recalling when all of these names are asked. We probably had, no exaggeration, 3 dozen requests a day, or a couple dozen requests a day for, again, all kinds of things. We were usually some of the last people there, because we were at 7:00 or 8:00 at night still trying to be responsive to people, whether we were able to get them that White House tour the next day or where they should go to dinner or something upcoming that weekend.

We had dozens and dozens of requests that had nothing to do even with politics, you know, a golf course to play on, you know, did we have a connection to help somebody get a ticket to a sold-out Orioles game because they were coming to town? I mean, just all kinds of little things that every project took 20 minutes. And we had 3 dozen a day to do.

Question. So as far as you know, there was no reason your office should treat Mr. Trie, Mr. Chung, Ms. Kanchanalak, any different from these thousands of other requests that you received?

Answer. Correct, because at the time I certainly was not aware of the things that now, because of recent newspaper articles in 1997, 2 years after I left the DNC, I have since learned. But at the time they were supporters, just as I have said before, the little old man from out in the Midwest who did door hangings before elections every 2 years for the last 50 years, just as he was a supporter. It was my responsibility to be responsive to all supporters of the DNC. And that's why—and I didn't have access to the money. I didn't know how much these people gave, and it wasn't an issue because money wasn't an issue. I took care of—I didn't take care of Pauline Kanchanalak or any of the people that you have previously mentioned, frankly I don't think I did anything for them, but I wouldn't have taken care of them any better than I would have somebody that the DNC Political provided to me or the Office of State Chairs or any of the other departments. They all were important to

me. It was my job to try to respond to as many requests as I could do, to try to be responsive and fulfill these people's requests.

Question. I believe you have also testified that you were involved in trying to acquire Mr. Chung's photos from the Presidential radio address. Is that correct?

Answer. Correct.

Question. And at that time, or any time when you worked at NMS, did you have any suspicion that he might be an agent for the Chinese government?

Answer. No, absolutely not. He just—he just was—just, I think, always looking to speak to someone, you know, and for awhile I was talking to him and after me I am sure there was somebody else and probably somebody else. I had no knowledge of his—the question that you asked. I would not have known that.

Question. I just have a few more questions. These are some questions that one of the Members on our committee has asked that we ask all the deponents.

If you could just hold on a second.

If I can, before I do that, let me just jump back a second to some of the answers you just gave me. You mentioned that when you were at—when you were legislative representative for a group here in town that you attended some special briefings at the Bush White House. Isn't that correct?

Answer. Correct.

Question. And you mentioned one specific briefing with the President, President Bush, another one with Carla Hills. Can you give me—can you think of any other specific examples of briefings that you attended with Bush administration officials?

Answer. I have a vague recollection of also attending a briefing, a labor-related briefing, up on the fourth floor of the OEOB. But I—I don't recall specifically who was there or what the—what the topic of the briefing was.

Mr. LU. Actually, can we go off the record for just a minute, please.

[Off the record discussion.]

Mr. LU. Let's go back on the record. Could you read back the last part of his answer.

[The reporter read back as requested.]

EXAMINATION BY MR. LU:

Question. Were these briefings that you attended because your organization had given money to the RNC or to other Republican groups?

Answer. Well, I am not sure I could say that that is the reason why. We were involved in legislative efforts that were similar to legislative objectives and interests of the Bush White House, and so we were, as one of the friendly organizations, invited to substantive issue briefings, updates, at the White House.

Question. I believe you also mentioned earlier, when I asked you some questions, that you knew of some DNC supporters that had also supported the RNC and that some of these—sometimes these DNC supporters told you about the services that had been provided to them by the RNC. Are you able to describe for me any of those types of services that those supporters mentioned?

Answer. Well, one supporter mentioned that he was able to play tennis on the South Lawn at the White House, and that was certainly something I was not aware would even be a remote possibility. And as it turned out, I did not ever really pursue that ability, that opportunity. I didn't get people into the White House so they could go play tennis on the South Lawn, but I was told that the Bush administration had—that President Bush had allowed people to come over and play tennis with him, with others, on the tennis court.

Question. And other than playing tennis on the South Lawn, can you recall any other services that these supporters had mentioned that the RNC had provided them?

Answer. Well, I thought I remembered that actually supporters got to fly on Air Force One, but, again, that was not something that I was responsible for at the DNC so that didn't really matter. And I don't recall specifically all the things that were said, but somebody handed me the Team 100 and Eagles brochure from prior to 1993 when President Bush was—and his administration were here in town, and it showed a variety of these benefits.

Question. Some of which the DNC provided and some of which the DNC did not provide?

Answer. Correct.

Question. As I stated earlier, one of the Democratic Members of our committee has asked us to ask all the deponents some questions and they are pretty standard questions.

Have you been asked by any other official investigative body to testify or provide evidence on any of the fund-raising or other matters being investigated by this committee?

Answer. No.

Question. So you have not been interviewed or deposed by the Senate Governmental Affairs Committee?

Answer. I have not.

Question. Or the Department of Justice?

Answer. Correct.

Question. And I assume, because you are not a current employee, you also did not provide any documents to this committee?

Answer. Correct.

Question. Although I believe you said you searched your own personal records for those documents.

Answer. I was told I needed to do that to see if I had any documents, and if I had them I would have been happy to provide them, but I didn't think I did.

Question. And have you received any requests to provide documents or be interviewed or be deposed by any other investigative body in the future?

Answer. No.

Question. Can you estimate how much time—how much of your time you have spent in preparing and attending this deposition?

Answer. Besides the daily anxiety of anticipating a deposition and then my deposition last week being postponed because the morning deposition was running too long?

Question. Yes.

Answer. You know, I have been here all day and I have had to have two meetings with counsel, rearrange schedules. I actually was supposed to be out of town today, flying back in this morning actually, but I flew in yesterday so I could make this deposition. So time wise, you know, 15 or 20 hours.

Question. And I think you told us at the outset of your deposition that you are self-employed as a consultant?

Answer. Correct.

Question. So in terms of any costs to your employer, those would be really costs to you?

Answer. True. But my costs is that I am not working today and I am not either seeking clients, which are my sole source of income, and I am not working for the few clients I have to help them, you know, finish up projects I am working on for them.

Question. Has this committee offered to reimburse you for your time and/or expenses?

Answer. Not that I am aware of.

Question. If it is available, will you seek reimbursement from this committee for your expenses?

Answer. Probably not. I don't know. I would like to reserve judgment on that. At this time, that's not something that I was considering.

Mr. LU. No further questions.

EXAMINATION BY MR. WILSON:

Question. Was there any distinction between the types of events that you helped people attend at the White House in terms—and that's a self-imposed distinction, a hierarchy where one was more important than another in your mind?

Mr. BEST. Do you want him to distinguish in terms of importance? Is that what you are saying?

Mr. WILSON. I am asking whether the NMS staff prioritized or had a hierarchy of the different types of events that you helped people—facilitated for people.

The WITNESS. I would say only one kind of event would be considered more important to us than any other, and that's a State dinner, and they are obviously important enough that the guest lists are published in the Washington Post and it is always a big story in the Style section when there is a State dinner. Other than that—and this President hasn't done many State dinners. He didn't do one his entire first year in 1993, so they are much more few and far between compared to other kinds of events.

Beyond that, no, all events are the same.

EXAMINATION BY MR. WILSON:

Question. You mentioned earlier that Mr. Chung's laundry list of requests was—it is my words, not yours, but somewhat farfetched. Were you aware of any other

requests by DNC supporters that were simply deemed inappropriate? And I am not asking whether they were not possible but just simply inappropriate.

Mr. BEST. Deemed by him inappropriate?

Mr. WILSON. Deemed by Mr. Sildon to be inappropriate.

The WITNESS. Requested of me?

EXAMINATION BY MR. WILSON:

Question. Correct.

Answer. Since some requests may have come in that DNC staff never submitted to me?

Question. Yes.

Answer. Well, I don't—I don't recall. I certainly don't recall. There either may have been some—I am sure there were some. I am sure there were requests that came in that you just looked at and went, I don't think so, but I don't recall specifically such requests.

Question. Do you recall requests being made by individuals that any of your DNC colleagues thought were inappropriate because of who the person was who was making the request?

Answer. Not that I am aware of.

Question. Was there any distinction that you knew of, when you were at both NMS and in your position as regional finance director, where there were distinctions drawn between facilitating meetings for a policy nature or for doing something that was more of a spectator sport type of request, for example, going on a tour or visiting a building?

Answer. I am sorry. I actually need you to rephrase the question.

Question. I don't think anybody would have understood that question. was there a distinction drawn by anybody at the DNC that you knew of, for the entire time that you were there, between the types of events that involved meeting with policy-type employees and simply attending events or going to look at a building?

Mr. BEST. Are you characterizing a meeting with a policy-type official as an event?

Mr. WILSON. Yes.

The WITNESS. I want to make sure I understand the question.

It appears to me what you are asking is, did I weight equally, providing—helping provide a tour and meeting with an administration official? Is that your question? I want to make sure. Is that your question?

EXAMINATION BY MR. WILSON:

Question. Right.

Answer. No, I would say I probably would not have weighted those equally.

First of all, again, I very, very seldom asked to arrange for a meeting for someone, but if I was, and there was—first of all, I didn't arrange any meetings. All I did was forwarded information on to an office on behalf of some constituent for that office to decide whether or not they wanted to take a meeting.

But if I was asked on the same day to help get somebody a tour and to help forward information along for a meeting, I would certainly do the tour without qualification and I would want to—I would want someone to tell me that I was supposed to make a call for a meeting.

Again, I did it so seldom, but when I did do it, it would have been because there was some reasonable explanation for why this person needed to or wanted to meet with that person in the administration. And it was not for any reason other than whatever they put in their letter to whoever they sent a letter to at the DNC that got forwarded to me that I simply put in a fax and sent along. Then at that point it was up to that administration office to decide whether or not they wanted to have a meeting.

Question. Were you aware of any guidelines when it came to facilitating a meeting between a DNC supporter and an administration official?

Answer. Self-imposed guidelines, DNC guidelines?

Question. Either self-imposed or written or verbal or any type of guidelines.

Answer. Again, I wasn't trying to arrange meetings. I was simply forwarding letters.

Question. Were you aware of any guidelines?

Mr. BEST. With regard to forwarding letters?

Mr. WILSON. No, with regard to facilitating meetings with administration officials.

The WITNESS. Can I have just a moment?

Mr. WILSON. Absolutely.

[Witness conferring with counsel.]

The WITNESS. Okay. When I received a request, I would only forward requests along that were not competitive in nature where it looked like the DNC was representing one company, corporation, individual versus others in any kind of—if there was—we weren't allowed to—if somebody had a contract with the Federal Government, we weren't allowed to contact that agency on their behalf. We weren't allowed to—in that sense, there were those guidelines. But those weren't the kinds of things that ever came to me. I mean, that's not what people were bringing to me when someone from the Office of Political Affairs at the DNC or whatever would hand carry over a letter and say, I received this letter, it is addressed to me but I want to pass it on to you, can you forward it on to so and so in the administration? And, sure, put a cover note on it and say, this has been sent to us, we are sending it to you. This person would appreciate having a chance to talk to her. Here is their phone number. It is up to you.

But I certainly didn't forward things along if it had to do with—they had a bid or a contract with the government. I mean, another guidelines is, we weren't supposed to ever contact the Department of State, the Department of Justice or the Defense Department. I mean, those were just hands-off agencies. We weren't going to get involved in foreign policy decisions or recommending people, anything, at the State Department, Justice Department or Defense Department. We just wouldn't even consider forwarding it, even a letter, even just a letter that someone wanted to send out.

EXAMINATION BY MR. WILSON:

Question. How would you know if somebody had a contract with the Federal Government?

Answer. In that sense, I probably wouldn't. I wouldn't know if someone had a contract, but if in a letter it said, we would like to talk to you about the contract which we have with you, which—I don't know whatever they could say in the letter, that would be something that I wouldn't forward along.

But, sure, you are right, if—this didn't happen but if the chairman of a large corporation like AT&T called me and said he wanted a meeting, I wouldn't know whether they have or don't have a contract unless the text of the letter said we want to talk about it.

Question. Do you know if the DNC made any attempt to screen political contributors from meeting with administration policy staff?

Mr. BEST. Screening? What do you mean by "screening"?

Mr. WILSON. To either seek to learn what their interests were or—I will leave that—seek to learn what their interests were before they went to do whatever it is they were going to do.

Mr. BEST. You are assuming that such meetings took place?

Mr. WILSON. Yes.

The WITNESS. I don't know, because, again, I—I certainly wasn't involved really in this aspect. And I didn't set up meetings. You know, I forwarded a couple of letters along during the course of 2 years in the job role. So I appreciate the question you are asking me. Since I had very little, if any, experience with it in the first place I certainly don't know about the pre-vetting process for any of the other kinds of meetings that might have been set up by others.

As we discussed before, there were a lot of people at the DNC who had relationships around the administration and they would just call. They would call on their own.

EXAMINATION BY MR. WILSON:

Question. Do you know of any situations where the DNC made an attempt to prohibit a political contributor from meeting with any administration policy staff?

Answer. No. I don't know of—no, I don't know of such a situation.

Mr. WILSON. Thank you very much on behalf of the Majority. I appreciate your coming here and taking your time to speak with us.

I don't mean to cut this off.

Mr. LU. We have nothing. Thank you.

Mr. WILSON. Thank you very much.

[Whereupon, at 3:45 p.m., the deposition was concluded.]

[The exhibits referred to follow:]

MATT STEPHEN
SCOTT STEPH
VIDA DEBBIE
GRACE ALBIE
ROCCO LAUREN
ALICE BROOKE
SKY

FYI MARTHA BOBBY
DEBRA

MEMORANDUM

TO: State Arrival Coordinating Committee

FROM: Eric Sildon

DATE: September 27, 1994

RE: Yeltsin State Arrival Ceremony Attendance

The following individuals did not pick-up their tickets for the State Arrival Ceremony for President Boris Yeltsin on Tuesday, September 27, 1994:

Robert Clay	Marlyn Cohen	Mike Cooney
Joan Coplan	Susan Dahlquist	James Davidson
Elizabeth Dozoretz	Willard Dupree	Rufus Edmiste
Paul Equale	Pat Frank	Don Fowler
Joan Furlong	George Gilliam	Page Gilliam
William Green	Dan A. Gwadoski	Maria Haley
John Huang	William Itoh	Robert Keefe
Malcolm Lee	Boyd Lewis	
Kathleen Linehan	Herbert Mabry	Mary Maralit
Hani Masri	Gerald McEntee	Francis Moore
Patrick Murphy	Lawrence O'Brien	Neil Offen
Carol Pensky	Babette Penton	Gary Perkinson
Anthony Podesta	William Pound	Thomas Quinn
Barclay Resler	Linda Rhodes	
Elizabeth Robbins	Nancy Rollnick	Emily Scheyer
Eric Schnurer	Rick Stafford	Ronald Stowe
Susan Stout	Carmelo Velez	Clay Vigoda
Milton Wells	William Wells	Marvin Wilson
Grover Wrenn	Susan Wrenn	Phil Yun

The following individuals accepted their invitations for the State Arrival Ceremony for President Boris Yeltsin, and later cancelled:

Michael Bird	Thomas Blood	Loretta Bowen
Grover Bynum	Robert Elkins	Leon Lynch
Jack Moore	Bob Rose	Mark Weiner
Linda Tarr-Whelan		

EXHIBIT
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