

White House - Treasury Contacts

Memorandum

Office of the Independent Counsel

TO: Judge Starr
Mark Tuohey
John Bates

FROM: Alex Azar

DATE: December 27, 1994 (Revision date: January 21, 1995)

SUBJECT: Preliminary investigative plan for White House-Treasury contacts case

In anticipation of our meeting to discuss the status of the White House-Treasury contacts investigation, I have prepared the following preliminary investigative plan. The plan details in chronological order the events that -- broadly speaking -- may merit further inquiry and lists (in all capital letters) the witnesses that we may want to speak with about each event and the avenues of questioning that might be pursued. Please note that this outline does not purport to be a complete chronology of the case; rather, it lists only those events that may warrant additional investigation (certain events have been so fully explored before the grand jury or in interviews that no further investigation would likely prove fruitful). In addition, this plan is obviously extremely over-inclusive; I doubt that after what I assume will be our several meetings on this subject, we will decide to pursue all of these avenues of inquiry or speak with all of the suggested witnesses.

This plan is based upon my review of all relevant 302's and grand jury transcripts, the complete sworn depositions taken this summer during the Inspectors General investigation, Mr. Fiske's final report, and my partially completed review of the House and Senate Banking Committee hearings from this summer. Not yet reviewed in any detail are the rest of the summer hearings, the sworn depositions taken by Senate Banking Committee investigators this summer (these depositions have not yet been made available to us despite our repeated requests), and the voluminous agency and witness document productions. Thus, this plan is necessarily tentative in nature; additional investigative avenues may arise as the review continues, and conversely others may be closed with the discovery of additional information in the remaining materials.

I have not at this stage attempted to make recommendations as to the form that any witness questioning should take (FBI interviews, grand jury testimony, or sworn depositions). That is a matter that we will have to discuss as this investigative plan is refined. As a general matter, though, I have found the actual transcripts (either from depositions or the grand jury) to be most helpful in getting a complete picture of the complex events spanning this one year period. In addition, in a case such as this -- where all witness statements are

being reviewed for falsity and possible criminal charges and where it is critical to lock in witness statements before a possible second round of congressional hearings -- it will probably be necessary to question most of these witnesses either in sworn depositions or before the grand jury, whether or not those appearances are preceded by initial FBI interviews.

Please excuse the length, but given that it is in outline form, I think you will find it a quick read:

1. March 23, 1993: Altman's first staff meeting at RTC; Roelle tells Altman that 0004 will mention Clintons; Altman does not remember; 9:04 p.m. Altman sends fax to Nussbaum of New York Times article on Whitewater; fax resent March 24, 1993 at 8:58 a.m.

a. ALTMAN; NUSSBAUM; STEINER (ALTMAN ASST)

- NOT ASKED RE THIS
- DO PHONE RECORDS

- SHOWS ALTMAN
WAS LIEBOUZE
SAID NO CONTACT
LATER

i. Any discussions between the two of them along with this urgent fax or just pure coincidence?

2. September 27, 1993: Roelle tells Hanson about referrals

- WHY GET INFO & TALK DISCUSS
IT W/ NUSSBAUM - TELL US
WHAT SHE KNEW TO TELL
NUSSBAUM

a. HANSON; ROELLE:

i. What detail on referrals was she given; in particular did she learn of Tucker at this point?

ii. If so, did she tell WHS about Tucker?

REMARKS TO NUSBAUM TAP OFF
BT WHS.

DID ROELLE TELL
HANSON?

iii. Confront Hanson with Roelle's warning that she tell no one but Altman

- ROELLE ADAMANT HE REPEATEDLY SAID TELL NO ONE BUT
BUT ROELLE DIDN'T INTERVIEW LATER TO STOP CONTACT

3. September 28, 1993: Hanson's call sheet lists Roelle, Cavanaugh, and Altman

a. Hanson doesn't remember anything about this and says her call sheet is also a to do list

b. CAVANAUGH: ^{- MEMO PROX} _{- SPEAKING IN RE. OF CALL SHEET}

i. Did Hanson call? Even if not, why would that name be on her call list?

ii. If we get phone records, we can check if she called Cavanaugh

4. September 29, 1993: Hanson briefs Nussbaum and Sloan at WHS

a. NUSSBAUM; SLOAN; HANSON:

- i. Was Tucker mentioned?
 - b. FOREMAN:
 - i. Was he briefed on this contact or on 10/14 contact (his notes from September/October 1993 refer to Nussbaum, sensitive RTC matters, investigative stories and reporters)
5. September 30, 1993: Hanson memo to Altman with Early Bird
- a. ALTMAN:
 - i. He admitted to IG that he saw Early Bird at some point about the referrals; did we know this?
 - b. BENTSEN:
 - i. Hanson's memo says he was briefed, although her testimony is that she's not sure if she briefed him on the WHS meeting or just the fact of the referrals; either way the memo contradicts Bentsen's testimony
6. October 4, 1993: Lyons, Caputo, and Lindsey are in contact re Gerth and Isikoff inquiries re referrals
- a. Lyons calls Caputo and recounts Gerth and Isikoff's questions about referrals; Caputo speaks with Lindsey; Lyons calls Lindsey to tell him about press inquiries re referrals
 - b. CAPUTO, LINDSEY; LYONS:
 - i. Need to clarify just what happened in these discussions
 - ii. Was Tucker mentioned?
7. October 6, 1993: Meeting at WHS with Clinton, Tucker, McLarty, and Hubbell
- a. Issue of whether Clinton may have tipped Tucker off to his target status in the criminal referral arose for the first time before SBC and HBC
 - b. HUBBELL; ~~MCLARTY~~; ~~CLINTON~~; KEITH MASON
 - i. Any mention of Tucker being subject of referral;
 - ii. Keith Mason was at the entire meeting and confirmed that Whitewater

and the referrals never came up; we will want to talk to Mason to confirm this

- iii. Cutler letter to Gonzalez on 7/27/94 stating that he reviewed Mason's notes of the meeting and Whitewater was not mentioned

8.

October 7, 1993: At RTC staff meeting, Roelle tells Altman and Hanson about Schmidt appearing at Lewis' home with questions about referrals

- a. Roelle clarifies this for IG: Had never mentioned Madison at staff meetings; finds out there is going to be article next day about referrals; tells Altman of imminent story by Schmidt with Schmidt's questions and the detailed information that she has on the 9 referrals; Altman calls Hanson and tells her what Roelle just told him
- b. Roelle says Altman told Hanson to let "Jack, Bernie, and the Secretary" know about these inquiries
- c. ~~HANSON; ALTMAN~~; ROELLE; NEWMAN: *↳ ASST. SEC. OF TREAS, REP. OF BOS. SING. OF RTC*
 - i. Hanson and Altman deny it, but confront them in grand jury
 - ii. Where did this meeting take place?
 - iii. Why such a meeting never mentioned at all by Altman or Hanson?
 - iv. Given Roelle's protestations about the confidentiality of this information, why didn't he interrupt and tell Altman not to have Hanson brief others?
 - v. Anyone else present for this discussion?
 - (1) Roelle told Katsanos that he had briefed Altman, Hanson, and Newman, so maybe Newman was also at this meeting

9. October __, 1993: After Gerth's October 11, 1993 call to him, DeVore calls Katsanos asking if these referrals have been handled any differently than others; tells him he is going to meet with Gearan

- a. DEVORE; KATSANOS:
 - i. Confront DeVore with these details so we can resolve whether Lindsey was the source of information at 10/14 that the referrals had been sent

- ii. What information did DeVore give Katsanos and what information did Katsanos confirm re the referrals thus giving DeVore non-public information?

~~10.~~ October __, 1993: RTC staff meetings where procedures for handling criminal referrals are discussed

- a. Bowman says Altman and Hanson were present for these discussions and may have even initiated them
- b. ALTMAN; HANSON; BOWMAN
 - i. Madison mentioned in particular?
 - ii. Reason for these discussions?

11. October 13, 1993: DeVore meets with Altman and Steiner re press inquiries about referrals

- a. DeVore doesn't remember this meeting, but his calendar shows meeting re RTC story
- b. DeVore also doesn't remember but it's possible he or Steiner told Altman of planned 10/14 meeting
- c. This may have been the meeting where DeVore suggested Altman or Hanson read the referrals

d. ALTMAN; STEINER; HANSON; DEVORE:

- i. Was 10/14 WHS meeting mentioned?
- ii. Hanson may have been at this meeting; recalls being called to meeting in Altman's office with DeVore and others with DeVore briefing on inquiries he's getting about criminal referrals
- iii. If this is all one meeting with Altman, Steiner, Hanson, and DeVore present, Steiner recalls a meeting with Hanson and DeVore on 10/13 where they discussed the 10/14 meeting at the WHS; is this the same meeting and was Altman present
- iv. Was Bentsen also briefed?

e. BENTSEN:

*- Shows Altman
more witness to read
10/14
WHS
- Katsanos
Altman
of 10/14*

- i. Briefed on impending press stories?

~~12.~~ October 14, 1993: Hanson, Steiner, and DeVore meet in Hanson's office before going over to WHS

a. HANSON; STEINER; DEVORE:

- i. What was discussed?

13. October 14, 1993: Meeting at WHS with Hanson, Steiner, DeVore, Nussbaum, Sloan, Eggleston, Gearan, and Lindsey

a. Who reported that the referrals had already been sent?

- i. Steiner claims it was Lindsey
- ii. Lindsey claims he learned it at the meeting
- iii. DeVore denies he reported it, but Katsanos does say that DeVore was the one who inquired whether they had been sent

iv. ~~LINDSEY~~; CASEY:

- (1) Did they talk?
- (2) Could Lindsey have learned of referrals having been sent from information given to him by Casey?

b. STEINER:

- i. Why did he stress at end of meeting that all of the information given at meeting came from press inquiries?
- ii. Were there WHS contacts immediately after 10/14? (Starts to talk about them in IG, but is interrupted)

c. BENTSEN:

- i. Steiner indicates it is possible he briefed Bentsen about 10/14 after the fact

14. October 14, 1993: RTC staff meeting in Hanson's office with Hanson, Bowman, and Curtis

- 10/7
- a. Curtis claims he gave Hanson the PLS analysis and Bowman took it and copied it
 - HANSON SAYS HAS NEVER SEEN PLS ANALYSIS
- b. ~~CURTIS; HANSON; BOWMAN:~~
 ROB. → GROSS (HANSON ASST); SEEN - CURTIS SAYS BOWMAN XEROXED IT → GAVE IT TO HANSON.
 - BOWMAN ASST REMEMBER PLS ANALYSIS.
- i. We know that Hanson and Bowman deny this, but they should do so before grand jury
- ii. Did Hanson mention she had just come from WHS meeting?
- iii. Anyone else present at this meeting? Hanson's special assistant?
 - GROSS
 - HANSON SEEN
15. October __, 1993: Iorio claims Yanda sent Hanson the referrals and the PLS analysis by Federal Express (this could just be wild surmise) (Note: Iorio just made this claim in a recent interview):
- a. ~~HANSON; YANDA; IORIO:~~
- i. Ask about this claim
16. October __, 1994: Lindsey calls custodian of campaign records in Little Rock to check on Gerth's information re \$3,000 checks made out to Clinton and campaign at 1985 fundraiser
- a. ~~LINDSEY:~~
- i. Who did he talk to?
- ii. What did he learn?
- iii. What instructions did he give to that person?
- b. WHITEACRE:
- i. Suspected to be the custodian of records he called
- ii. Substance of discussions with Lindsey?
- iii. Faxed some documents to Lindsey (Duffey has them)
17. October __, 1994: Logue-Kinder orders Katsanos not to mention HRC in Early Bird items dealing with Rose Law Firm and keep Rose Law Firm name out of Early Bird
- a. LOGUE-KINDER:

- i. Why and at whose direction?

18. Fall 1994: Roelle summarily dismissed as CFO and transferee to FDIC

a. ROELLE; ALTMAN; HANSON; RYAN:

- i. Roelle claims to IG that it was in retaliation for not having sat on the referrals
- ii. What basis for this belief?
- iii. More properly handled as part of the RTC investigation?

19. December 21, 1993: Hanson prepares chronology detailing fall contacts on 9/27 and 10/14 (DOT 142)

a. HANSON; ALTMAN; BENTSEN:

STAMP: ROB. D GROSS

i. Why prepared?

ii. Distributed to?

- DO ANYTHING ON BENTSEN OFF IT?
-> DID SHE AUTHORIZE IT?

20. New Years, 1994: Clinton approach to Ludwig at Renaissance Weekend

- a. Ludwig calls Hanson at home seeking information about Madison
- b. Ludwig calls WHS Counsel office asking for Nussbaum or Sloan; call fielded by intern Tom Castleton
- c. Ludwig and Sloan talk by telephone
- d. Sloan and Klein speak and Klein decides to advise Clinton to cease communications re Madison with Ludwig
- e. LUDWIG; ~~KLEIN~~; ~~SLOAN~~; CASTLETON:

i. What information did Ludwig give Sloan and Castleton re Clinton's inquiry?

(CLOSE OUT)

21. January 3, 1994: Altman's diary indicates Bentsen met with Stephanopoulos to urge "lancing the boil" of Whitewater

a. ~~ALTMAN~~:

- i. Why was this contact not disclosed?
 - b. BENTSEN; *STEPHANOPOULOS*
 - i. Describe this contact
22. January 4, 1994: Altman's diary indicates conversation with Williams about IC appointment at a health care meeting
- in 3/11 LETTER, ALTMAN SAYS
WAS DISCUSSING JUST
INCIDENTAL GRANTS, BUT HE
DONT DISCLOSE THIS ONE*
- a. ~~ALTMAN~~; ~~WILLIAMS~~:
 - (- compare EXISTING FILES)*
 - i. Why was this contact not disclosed?
 - ii. What about HRC being paralyzed by Whitewater; was this a request for Altman to do something?
 - iii. What about WHS negotiating to control scope of IC jurisdiction?
23. January 1994: Ludwig calls Williams and tells her WHS should disclose everything about Whitewater and should be sure to have a lawyer involved in WHS response team
- a. LUDWIG; ~~WILLIAMS~~: *(look out)*
 - i. Describe this contact
 - ii. Why did Ludwig call her?
- ~~24.~~ January __, 1994: Altman decides to reopen Madison civil at RTC staff meeting
- a. Ryan told us about this decision
 - b. ~~ALTMAN~~:
 - i. Why was this not disclosed?
 - ii. Conflicts with his repeated assertion that he has never made any decisions re Madison
25. January 12, 1994: RTC staff meeting at Treasury with Hanson, Bowman, Barker, and Hinde discussing response to Republican letter re need for tolling agreements *(DIA memo)*
- a. Note: This is the same day that Clinton agreed to ask Reno to appoint an IC *(Hanson memo re Clinton memo)*

- b. Hindes repeats the briefing he had just given earlier that day to Ryan re Madison civil investigation
- c. Hindes tasked with writing memo to Barker re Madison civil investigation and tolling agreements
- d. Barker claims Hanson asked him if she could see the referrals (Note: we were the first to learn of this claim); Hindes and Bowman do not remember this discussion

- i. HANSON; ALTMAN; ~~BOWMAN; HINDES~~: *Spoke with J. TM*
 - (1) Hanson has consistently denied ever asking to see the referrals, but does not know of this new evidence
 - (2) Was Altman aware of this request?

- e. Hindes claims Hanson asks him to get ready for a possible briefing for Altman on the criminal referrals (Note: we were the first to learn of this claim)

- i. HANSON; BOWMAN; ALTMAN:
 - (1) Where did idea originate? Altman?
 - (2) Was Altman aware of these preparations?
- ii. DUDINE; KATSANOS:
 - (1) E-mail to Iorio (attached to Iorio 302) refers to preparation for briefing
 - (2) Dudine tells IG that Katsanos originally suggested getting ready for a briefing
 - (3) How do these communications relate to Hindes' claim?

- f. Hindes claims he, Bowman, and Barker huddle after this meeting in Bowman's office to discuss Hanson's request for a criminal referral briefing for Altman and agree that the less Altman knows the better

- i. ~~BOWMAN; BARKER~~:
 - (1) Why want to keep Altman in the dark?

*COMPLETE 10/20/07
PARTS X
12/13/07*

- g. Anyone else present at this meeting (or follow up huddle)? Hanson's special assistant?
26. January 1994: Barker, Bowman, and Kulka discuss civil jurisdiction of IC
- a. Barker claims Bowman asked whether Fiske could take over Madison civil and Barker said not without RTC's consent; Bowman does not remember this
 - b. Barker claims that the issue of Fiske taking over Madison civil arose again in Kulka's presence after his initial discussion with Bowman; Bowman does not remember this
 - c. KULKA:
 - i. Timing of these discussions and RTC's consideration of this issue
 - ii. Any pressure from DOT or WHS for RTC to hand over Madison civil to Fiske?
 - d. HUBBELL:
 - i. Any effort by WHS to control scope of IC charter?
- ~~27.~~ January 25, 1994: Bowman faxes Hinds' January 13, 1994 memo re tolling agreements and Madison civil to Hanson
- a. HANSON; ALTMAN:
 - i. Was this memo shared with Altman?
28. January __, 1994: Hanson asks Kulka whether Fiske could take civil jurisdiction
- a. Kulka tells her only if RTC consents; plus her discussions with Fiske indicate he probably isn't interested
 - b. HANSON; ~~ALTMAN~~:
 - i. Why did she ask this question? Altman's prodding?
 - ii. Was Altman aware of these discussions?
- ~~29.~~ February 1, 1994: Meeting with Altman, Hanson, Levy, Newman, Nye, Kulka, and Steiner re Altman's recusal; Kulka provides briefing on statute of limitations and tolling agreements

- a. ALTMAN; HANSON; LEVY; NEWMAN; NYE; KULKA; STEINER:
 - i. Nature of discussion
 - ii. Were others present?
 - iii. Steiner tells IG that Steiner, Levy, Newman, Affleck-Smith (?), Nye, and Kulka knew about 2/2 meeting in advance; how? Was it discussed at this meeting?
 - (1) Was the purpose of the 2/2 meeting at the WHS discussed, in particular was one purpose to discuss/announce recusal?
 - (2) AFFLECK-SMITH(?)
 - (a) Who is she? How did she know about 2/2 in advance? What information does she have for us?
 - (b) Was she at this meeting?

30. February 1, 1994: Meeting with Altman, Bentsen, and Hanson

- a. Hanson claims Altman was decided on recusing; Bentsen said that was a smart decision; Altman tells Bentsen that they will meet with WHS to inform them of recusal decision
- b. Altman denies having decided on recusal
- c. BENTSEN:
 - i. Nature of recusal discussion; was Altman decided already?
 - ii. Statute of limitations briefing
 - iii. Informed of WHS meeting planned for 2/2 and its purpose?
 - iv. Purpose of 2/2 to discuss/announce recusal?
- d. ~~ALTMAN:~~ *- ALTMAN SAYS HE DIDN'T TELL BENTSEN WE WERE GOING TO WHS*
- HANSON SAYS HE DID TELL BENTSEN
- BUT NEAR Q&A SAYS HE WOULD TELL
 - i. Was the 2/2 meeting discussed in Bentsen's presence?

~~31.~~ February 2, 1994: Possible Hanson meeting with Williams at 1:20 p.m.

- a. Not sure about this one; mentioned in HBC hearings; Williams denies meeting with Hanson before the big meeting; reference in Hanson's notes of this meeting; do we have them?
- b. HANSON; WILLIAMS:
 - i. Raise this issue with them

32. February 2, 1994: Meeting at WHS with Altman, Hanson, Ickes, Williams, Eggleston, and Nussbaum

~~A.~~ WILLIAMS' SECRETARY:

- i. Who invited Williams to this meeting and why was it put on her schedule?

b. ICKES; CLINTON; HRC:

NEVER ASKED IF BRUCCES ON THIS DIRECTION *SEPARATE MEETINGS*

- i. Ickes admitted to IG and Senate that he briefed HRC and Clinton about the meeting FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury

★

(1)

- Don't know timing of when briefed re 2/2 MTG - probly soon after 2/2

(2) Why not disclosed by the Clintons?

(3) This is critical because Ickes is the only one at the meeting who believes Altman said RTC would have trouble completing its investigation in time for the 2/28 statute of limitations deadline (others say Altman assured them that RTC would be able to make a recommendation in time)

(4) Did Ickes repeat this information to the Clintons?

32A → CAUS

33. February 3, 1994: Meeting in Williams' office with Altman, Ickes, and Eggleston re Altman's non-recusal decision; Altman leaves and Hanson appears and continues discussion

- ALTMAN SAYS IN EVENING BUT USAR IT AT NOON; HE CAUSED WILLIAMS TO SET IT UP (WILLIAMS SAYS); BUT HE SAYS HE SET UP W/ ICKES.

a. WILLIAMS; ALTMAN; ICKES; STEPHANOPOULOS; EGGLESTON; HANSON:

- i. Was Williams present (sitting at her desk?) while others were in sitting area talking during Altman discussion? After Hanson arrived?
- ii. Nail down the timing of this meeting; if a prelude to the evening health

- HE AT WORK, ITS A SEPARATE MTG AT NIGHT, ITS ADVISABLE TO ANTICIPATE WITH LESS SIGNIF.

COMPLETE INFO TO ANSWER

Compuls
info

care meeting as Altman claims, it looks more incidental; if separately scheduled event around lunch time, it is a much more significant event

(1) Check Secret Service logs for Altman and Hanson entry to WHS

iii. Was Stephanopoulos present?

34. February 3, 1994: Hanson calls Nussbaum re Leach letter advising recusal

- Start of:
Nussbaum tells Hanson
Foreman call Nolan re ethics and recusal
Nussbaum suggests giving Fiske Madison civil claims
Nussbaum asks how Kulka hired
HANSON:
Did she disclose this conversation to us?

a. Nussbaum tells Hanson to have Foreman call Nolan re ethics and recusal

(NOLAN) (FOREMAN)

b. Nussbaum suggests giving Fiske Madison civil claims

↳ Don't see president bad for
EXEC BRANCH
- what did Nussb. tell
Nolan.

c. Nussbaum asks how Kulka hired

d. HANSON:

i. Did she disclose this conversation to us?

35. February 3, 1994: Meeting with Bentsen, Altman, and Hanson re Altman's recusal decision - not explored w/ Altman

a. Hanson says Altman recounts WHS 2/2 meeting < BENTSEN KALEN

b. BENTSEN; ~~ALTMAN~~:

i. Describe this meeting

FOIA(b)(3) - Fed. R

ii. Was WHS 2/2 meeting discussed?

- Followed by "FOR THE RECORD" MEETING

36. February 3, 1994: Kulka claims Hanson and Kulka have conversation about Altman's decision not to recuse where Hanson by silence implies WHS caused Altman to not recuse

a. HANSON; KULKA:

i. What did Hanson mean by her silence?

ii. Nail down when this discussion occurred; before or after 2/2 meeting?

b.

[Redacted]

37. February __, 1994: ABC News makes inquiry re 2/2 WHS meeting leading to conversations between Altman, Schloss, Terzano, and Lindsey to handle response
- a. Altman describes 2/2 meeting to Lindsey and Hanson's follow up with Kulka about briefing the private attorneys; also says he will not recuse because he will just let his appointment lapse
 - b. ~~ALTMAN~~; SCHLOSS; TERZANO; LINDSEY:
 - i. Clarify the sequence of contacts re the ABC News inquiry
 - ii. What did Altman say about 2/2 in any of these conversations?
 - iii. Why not disclosed by Altman?
38. February __, 1994: Meeting with Bentsen, Knight, Altman, and Hanson "for the record" re Altman's recusal decision-making process
- a. According to Hanson, Altman tells them he met with Bentsen and Hanson on 2/1 and stated that he had reserved judgment on recusal; they met again on 2/3 and Altman told them that he had decided not to recuse
 - b. Hanson tells IG and SBC that WHS 2/2 meeting is mentioned;
 - - - - - FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
 - c. In post-meeting huddle, Bentsen tells Hanson that's not how he remembers it (i.e., Altman had said he had decided to recuse at the first meeting)
 - d. BENTSEN; ~~HANSON~~; KNIGHT; ~~ALTMAN~~:
 - i. Purpose of meeting
 - ii. Huddle with Hanson
 - iii. 2/2 WHS meeting discussed?
 - iv. Why was Knight there?
 - v.
 - vi. Does Knight have any kind of diary or daytimer that would record this meeting?

- vii. Why does Hanson think Knight was there and what does she think was the purpose for the "for the record" meeting with him present?
39. February 4, 1994: Nussbaum calls Hanson and tells her to look at Fiske's charter to see whether Fiske should take civil. February 5, 1994: Hanson speaks with Kulka about Fiske and RTC civil jurisdiction. Kulka says that Fiske had previously expressed relief at not having civil with a statute of limitations of 2/28. February 8, 1994: Hanson calls Nussbaum and thanks him for information on Fiske's charter
- a. HANSON; NUSSBAUM:
- i. FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
- ii. Purpose of these inquiries?
40. February 1994: Preparation of ethics opinion on recusal for Altman
- a. KOSINSKI; FOREMAN; NOLAN; NUSSBAUM; SLOAN:
- i. Nolan warned Foreman that whatever their conclusions were would set precedent
- ii. Did Nussbaum give Nolan his views on Altman not recusing?
- iii. Did Nolan say anything to Foreman to communicate WHS preference on recusal?
- iv. Sloan knew Nolan was having discussions with DOT re recusal; what information does he have about these discussions?
- b. Big meeting with Altman, Hanson, Foreman, Kulka, and Kosinski to discuss Altman's recusal
- i. Foreman told IG about this; not revealed to Fiske
- ii. ALTMAN; HANSON; FOREMAN; KULKA; KOSINSKI:
- (1) Were WHS' views mentioned during this meeting?
41. February 1994: Schloss calls Katsanos and orders him not to mention Altman in Early Birds re Rose Law firm and Madison
- a. SCHLOSS; ALTMAN:

- i. Was Altman the source of this request?
 - ii. Why now?
- 42. February 16, 1994: Steiner meets with Stephanopoulos at WHS re Altman's recusal decision, and Stephanopoulos advises in favor of recusal
 - a. Steiner claims he told Altman about this meeting; Steiner IG says he thinks Altman directed him to talk to Stephanopoulos
 - i. ALTMAN; STEINER:
 - (1) Confront Altman with Steiner's statement
 - (2) Get Steiner before grand jury with this claim
 - (3) Did Steiner mention this contact to Altman during the preparation sessions and urge its inclusion in the Q&A's? Why not?
- 43. February 1994: Podesta and Stern call Steiner some time after 2/16 re Altman's preparation for the 2/24 hearings and re Stephens' appointment
 - a. Steiner says they called asking to see the Q&A's prepared for Altman's testimony
 - i. STEINER; PODESTA; STERN:
 - (1) Were they sent the Q&A's? Who saw them?
 - b. Steiner says they thought it was extraordinary that Stephens had been hired and asked how he had been hired
 - i. PODESTA; STERN:
 - (1) Did anyone at the WHS suggest they ask about Stephens?
 - c. Steiner claims he told Altman about this call
 - i. STEINER:
 - (1) Nail him down; which conversations with Podesta did he tell Altman about

ii. ALTMAN:

(1) Confront him with Steiner's statement

44. February 1994: Steiner checks with Hanson's office to see how RTC hired Stephens

a. Steiner thinks it was Hanson or Robin Gross that he checked with

b. ~~HANSON~~; ROBIN GROSS:

- STEINER FINDS OUT IT
WAS THROUGH 1-STEP. BOARD.

i. Who did they check with at RTC?

45. February 1994: Steiner calls Podesta to let him know of RTC hiring decision process

a. PODESTA; STEINER; STEPHANOPOULOS; ICKES; EGGLESTON:

i. Any request for further action?

ii. Did Podesta report these findings to Stephanopoulos, Ickes, or Eggleston, who later made similar inquiries?

46. February 1994: Preparation sessions for Altman's 2/24 testimony

a. STEINER:

i. Did he tell Altman of the contacts he had had with WHS in February 1994?

b. Everyone who participated: LEVY; STEINER; HANSON; KULKA; ALTMAN; NEWMAN; NYE; RYAN; BOWMAN: ~~KULKA~~

i. Fall meetings mentioned?

ii. Criminal referrals mentioned?

iii. Kulka's advice to Altman that he shouldn't use word "substantive" since it could be misinterpreted

(1) How did Altman respond?

iv. Who raised the contacts issue (Ryan) and why did he raise it?

v. Recusal as subject of 2/2 meeting and other contacts discussed?

vi. Why did Altman draft the response himself? Very strange for Altman to do so?

vii. What was the one "incidental" contact referred to in Q&A's?

(1) Any other "incidental" contacts mentioned?

47. February __, 1994: Stern reviews Altman's testimony for Podesta

a. Stern's 302 says he didn't learn of 2/2 meeting until 2/25 press reports

- BOK AS 43-44, HE MADE SURE DRAFT Q&A

b. Stern told Podesta testimony was straightforward

c. STERN:

i. Was he given Q&A's or just the opening statement? (If he was given Q&A's then he learned about 2/2 before 2/25)

ii. How can he have learned only as of 2/25 when Podesta says Podesta knew about 2/2 from the preparations for the hearings?

48. February 23, 1994: Meeting with Bentsen and Altman re recusal

a. Bentsen says he told him it's a personal decision

b. BENTSEN; ~~ALTMAN~~:

i. Why did we not hear of this meeting before?

ii. Why is issue being discussed again?

iii. Anyone else present?

*- BENTSEN probably confused
* THIS IS 2/3 MFB*

49. February 23, 1994: Altman tells Hanson to inform Nussbaum that he will let appointment lapse, so he won't be involved in Madison; Hanson does so

(de facto recusal)

a. Nussbaum says that means DOT is leaving WHS with Kulka

upset

b. ALTMAN; HANSON; NUSSBAUM:

i. Why didn't we learn of this?

ii. Why contact Nussbaum?

ii. Did Hanson report back to Altman re contact w/ Nussb.

50. February 23, 1994: Meeting at WHS with Griffin, Williams, Nussbaum, Ickes, Eggleston, and Lindsey re Altman's testimony

a.

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b. GRIFFIN; WILLIAMS; NUSSBAUM; ICKES; EGGLESTON; LINDSEY:

i. Purpose of meeting?

ii. What discussed?

iii. Any communications with Altman or staff re this meeting?

51. February 23, 1994: Eggleston calls Hanson to ensure Altman will disclose 2/2 meeting if asked

a. EGGLESTON:

i.

ii. Did Eggleston mention fall contacts or other 2/94 contacts?

b. ICKES:

i. Why was Ickes so concerned?

52. February 23, 1994: Steiner calls Podesta to get reaction on Altman letting appointment as RTC CEO lapse

a. Podesta will check around WHS and get back to Steiner but he doesn't

b. Podesta says he told Steiner that they needed to be ready to disclose 2/2 (Eggleston had told Podesta of the meeting a couple days before)

c. STEINER:

i. Was this the conversation with Podesta that he told Altman about?

d. PODESTA:

i. Why did he mention need to disclose 2/2 meeting? Anyone else suggest that he do this?

53. February 23, 1994: Steiner calls Griffin to get reaction on Altman letting appointment at RTC CEO lapse

a. STEINER; ALTMAN:

i. Did Steiner tell Altman about this contact?

54. February 23, 1994: Steiner calls Stephanopoulos to get reaction on Altman letting appointment at RTC CEO lapse

a. STEINER; ALTMAN:

i. Did Steiner tell Altman about this contact?

55. February 23, 1994: Griffin returns Steiner's call

a. Steiner tells him not to worry because Stephanopoulos is checking for WHS reaction

b. STEINER; ALTMAN:

i. Did Steiner tell Altman about this contact?

56. February 23, 1994: Altman calls Ickes

a. Dispute over subject of call:

i. Ickes says Altman told him he was thinking of recusing himself at hearing and wanted reaction; Ickes asks what has changed?

ii. Steiner and Altman say call was about Altman announcing he would step down as CEO

b. ALTMAN: *Steiner; Ickes*

i. Why make this call?

ii. Why was it not disclosed to Congress?

57. February 23, 1994: Ickes calls for Altman but in his absence speaks with Steiner

a. Steiner 302 says Ickes reported WHS would rather Altman not announce he was stepping down and that he could announce his recusal if the heat turns up;

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- b. STEINER; ALTMAN; *Ickes*
 - i. Steiner told Altman about this call; what did he say?
 - ii. Was Stephens discussed?
 - iii. Why not disclosed to Congress?
- c. STEPHANOPOULOS:
 - i. Ickes says Stephanopoulos may have been in office when this call was made; was he on this call and did he hear anything?

58. February 23, 1994: Telephone call with Altman and D'Amato

- a. Altman initiated the call to let him know that WHS considering letting a nominee take over RTC
- b. D'Amato warns Altman that he will be asked about contacts and recusal at the hearing; Altman does not recall contacts being mentioned
- c. ALTMAN:
 - i. Why did we first hear of this before the SBC?
 - ii. Discuss this call with anyone else?

*- Altman failed to
① REUSAL TO
② ANSWER
③ WHO SET UP
④ SMO
QUESTIONS
MJK*

59. February 24, 1994: Altman testifies before Senate Banking Committee

- a. NUSSBAUM:
 - i. Seemed to have real concerns re Altman's failure to disclose recusal and saying only one question asked; explore
 - ii. Did he discuss concerns re testimony with Altman or others at DOT?
- b. HANSON:
 - i. She says she knew immediately that certain statements would need to be supplemented; which ones?

ii. Have her watch the tape with us and explain what she is thinking at each point, in particular what is happening when Altman leans back to her and she shakes her head after the Bond question

(1) Senate investigators were commissioned with asking her about this

c. STEINER:

i. Told SBC that he saw problem right away with failure to mention recusal and failure to mention other meetings

(1) Which other meetings?

(2) What did he say to Altman and when did he say it?

60. February 24, 1994: Altman tries to reach Nussbaum by telephone but Nussbaum is in Mexico

a. ALTMAN:

i. Why?

61. February-March __, 1994: Hanson and Foreman review the tape of Altman's testimony

a. Never asked about this by Fiske; inquired of by SBC

b. Dispute when Hanson looked at tape (Foreman says 2/25; Hanson says 3/1)

c. Hanson claims this was after Podesta called on 3/1 and since she didn't have transcript she had to transcribe Bond's questions

d. Hanson says she went home on night of 3/1 and attempted to recall information following Podesta's call to Altman; types out draft Q&A's saying Altman didn't ask her to brief Nussbaum about referrals; after this night, she later recalls that Altman asked her to go over on 9/27. These Q&A's appear at DOT 4466; 4467

e. HANSON; FOREMAN:

i. What was discussed?

ii. Was anyone else involved?

*- when did this transcription take place on 25th or 1st
- if 25th, knew of probs
- if testimony was
before correction then
say they knew there
was need to correct.*

- iii. Information/thoughts conveyed to Altman?
 - iv. Have Hanson explain her draft Q&A stating that Altman did not tell her to brief Nussbaum about the referrals
62. February __, 1994: Clinton meets with Lindsey and McLarty re Stephens appointment
- a. Clinton is amused, concerned, and frustrated
 - b. MCLARTY; LINDSEY:
 - i. What did they hear from Clinton?
 - ii. Did they talk to Ickes or Stephanopoulos and characterize Clinton's anger?
63. February 25, 1994: Bentsen learns that Altman testified about the 2/2 meeting
- a. BENTSEN:
 - i. Who told him?
 - ii. How was it characterized in terms of veracity?
 - iii. Did he speak with anyone about this testimony?
 - iv. What was his view of its veracity?
64. February 25, 1994: Meeting with Altman, Steiner, Levy, Schloss, Nye, and Hanson re whether Altman should recuse
- a. ~~ALTMAN; STEINER; LEVY; SCHLOSS; NYE; HANSON:~~
 - i. Any mention of concern about accuracy of his testimony during these discussions?
65. February 25, 1994: Eggleston calls Hanson and asks her if Stephens had been hired
- a. HANSON:
 - i. Why didn't she tell us about this contact but told IG?
66. February 25, 1994: At WHS staff meeting, Eggleston provides summary of Altman's testimony

RECALL
IF SLOAN
ANSWER
THIS
WAS
RE
TESTIMONY

67.
68.
69.

a. EGGLESTON:

i. Any concerns noted?

February 25, 1994: Sloan tells Klein he is concerned about statement saying only one meeting; tells Klein about fall meetings

a. KLEIN:

i. What was he told?

ii. Did he communicate this information with DOT?

February 25, 1994: Eggleston calls Nussbaum in Mexico

a. EGGLESTON; NUSSBAUM:

i. Subject of discussion?

February __, 1994: Klein asks Sloan to review Altman's testimony to consider whether Altman should have disclosed fall meetings in response to Bond

a. KLEIN:

i. Why did he do this?

70. February 24 or 25, 1994: Discussion with Hanson, Steiner, and Levy where Steiner says Kulka should be fired for hiring Stephens

a. Steiner also asked whether Fiske could take over civil so they could get rid of Stephens

b. Steiner says can you believe these guys want to see if they can get rid of Stephens, ridiculous to think they could (confirms diary)

c. Hanson remembers either Altman or Steiner asking her how Stephens was hired; she said normal process; they asked her to double check

i. ALTMAN; STEINER:

(1) When did this happen?

(2) Was Altman present at this meeting?

d. LEVY:
i. What did he hear at this meeting?

e. BENTSEN:
i. Aware of any of these communications re Stephens?

71. February 25, 1994: DOT receives transcript of Altman's 2/24 testimony

a. According to Sarbanes, Fran Davis received it

b. FRAN DAVIS:

i. Did she give transcript to anyone else at DOT? When?

72. February 25, 1994: McLarty and Ickes meet re Altman's testimony

a. Washington Post 8/3 has story detailing many WHS meetings in response to concerns about Altman's testimony

b. MCLARTY; ICKES:

i. Subject of discussion?

ii. Why meet?

iii. Passed on concerns to DOT?

c. BENTSEN:

i. Aware of any of these concerns re falsity of Altman's testimony?

73. February 25, 1994: Telephone call with Stephanopoulos and Steiner

a. Stephanopoulos says unfortunate how Altman recused; asks how Stephens hired; Steiner tells him

b. Stephanopoulos thinks conflict of interest; thinks DOT should fix situation; told nothing can be done

c. Altman is in room for call

i. STEPHANOPOULOS:

- (1) Given that he is told this information and that it is final why would he repeat his queries with Altman and Ickes?
- (2) Did he tell Ickes about his Stephens and recusal discussions with Steiner?
- (3) Had Podesta or Stern already reported to him how Stephens was hired?

ii. ALTMAN:

- (1) Why didn't he ever tell us he was there
- (2) What did he hear; what did Steiner tell him Stephanopoulos said?

74. February 25, 1994: Ickes and Stephanopoulos call Altman *re his recusal & Stephens*

- a. Discuss recusal process and Stephens and Clinton being upset; Stephanopoulos doesn't remember Stephens coming up
- b. ICKES:
 - i. Did Stephanopoulos tell him about his earlier conversation with Steiner about Stephens?
 - ii. If so, then Ickes' claim that this call was to confirm their information about Altman recusing is totally false
 - iii. This reeks of going over Steiner's head after he already said nothing could be done; no longer in the realm of blowing off steam

~~75.~~ February 25, 1994: Altman tells Steiner about the call from Ickes and Stephanopoulos

- a. Altman says they were very upset about Stephens; it was a stupid call to make; crazy to try to fire Stephens (confirms diary)
- b. STEINER:
 - i. Given Altman's testimony, why does he distance himself from his own diary with similar thoughts (pressure from Stephanopoulos?)

76. February 28, 1994: Klein and Sloan discuss Altman's testimony over lunch; decide to have Eggleston review transcript for inaccuracies and inform Altman

a. Sloan says Klein is particularly concerned about failure to mention recusal

i. KLEIN:

- (1) Why concerned?
- (2) Other concerns?
- (3) Klein's concerns passed on to DOT?
- (4) What did Eggleston report?
- (5) Did Eggleston pass on his analysis to DOT?

77. February 28, 1994: Steiner's diary entry says amazingly recusal did not come up at 2/24

- ALTMAN DID NOT GET ASKED RE RECUSAL AT HEARING.

a. STEINER:

- i. Were there discussions at DOT about recusal already?
- ii. Was Altman involved in those discussions?
- iii. Who else was involved?

78. February 28, 1994: Memo from Eggleston to Ickes that discusses 2/2 meeting

a. Ickes then passed this memo on to HRC on 3/1

- GET UNREDACTED COPY FROM KLEIN.

b. ICKES; HRC; ~~EGGLESTON~~:

- i. Contents?
- ii. Why written?
- iii. Why weren't we told of this earlier?
- iv. Did Clinton see this memo?

79. March 1, 1994: Meeting at WHS with Podesta, Nussbaum, Eggleston, Sloan, Klein, Myers, and Lindsey to discuss Altman's testimony

a. Lindsey says everyone thought Altman needed to correct on fall meetings and recusal discussion

- b. Podesta tasked to call Altman
- c. Eggleston says Klein was very concerned about recusal issue
- d. Eggleston says he thought recusal subsumed within procedures
- e. PODESTA; NUSSBAUM; EGGLESTON; SLOAN; KLEIN; LINDSEY; MYERS:
 - i. How did meeting come about?
 - ii. Everyone share these concerns about his testimony?
 - iii. Sloan says some think procedures encompasses recusal; who suggested this and was this theory passed on to Altman (ex post rationale by Altman?)?
 - iv. What information communicated to Altman?

80. March 1, 1994: Podesta calls Altman with WHS concerns re his testimony

-SAYS TALK TO YOUR FOLKS RE HIS and why they matters

- a. Altman thinks his response is accurate but will debate with staff whether to correct on recusal
- b. Podesta says he didn't mention the fall meetings, just that Altman needed to talk to his staff about whether his response to Bond was accurate; in particular sit down with Hanson and review the transcript; Altman says he's not sure he wants to know of any other meetings that may have taken place
- c. Podesta HBC testimony is a little different: Altman told him the recusal issue had already been raised at DOT; Altman said he forgot to mention recusal
- d. Hanson may have been present in room while this call was taking place; says the fall meetings weren't mentioned explicitly
- e. PODESTA; ALTMAN; HANSON; STEINER:
 - i. Who first suggested that recusal was subsumed within procedures? Altman or WHS?
 - ii. How did Altman first learn of fall meetings?
 - iii. Did Altman say he forgot to mention recusal?

*COMPILED
INFO
IS
TRUE*

↳ is he sure he knows of other mtgs

CONTRAST

iv. When did Steiner get involved?

- (1) Steiner was involved in these discussions at some point where Hanson lets Altman know of 9/29 and 10/14: this may have taken place as a separate meeting after Hanson talks to Podesta and gets her memory straight because Steiner recalls remembering 10/14 meeting and learning of 9/29 for first time; Steiner places this meeting possibly on 2/25

81. March 1, 1994: Possible follow up call with Podesta and Altman with Hanson in room

- a. Hanson says after Podesta expressed concerns about response to Bond; she looked at videotape, transcribed the 2 questions; went to Altman's office where he was on the phone with Podesta; Podesta says he understands there was meeting at WHS with Nussbaum about this; Hanson says it was by phone; Podesta then says Nussbaum said it was after Waco; Hanson remembers then that it was an in person meeting
- b. HANSON; ALTMAN; PODESTA:
 - i. Get the sequence of these conversations cleared up

82. March __, 1994: Altman asks Hanson to call Podesta, which she does:

- a. Podesta passes on what Nussbaum remembers of fall contacts and that refreshes her recollection of events
- b. This may be same as 3/1 call with Podesta, Altman, and Hanson

83. March 2, 1994: Hanson calls DeVore to ask about 10/14 meeting

- a. HANSON; DEVORE:
 - i. What was discussed?

84. March 2, 1994: Telephone call with Riegle and Altman

- a. Riegle offers to reopen hearings so Altman can clarify his testimony but Altman refused
- b. ALTMAN:
 - i. Why refused?

- 85. March 2, 1994: Altman's first correction letter to Riegler
 - a. No non-public information; no knowledge of communications between RTC and WHS; just learned of 2 conversations between DOT and WHS staff related to handling of press inquiries
 - b. Steiner says he told Altman as this letter was being prepared of his 2/16 discussion with Stephanopoulos re recusal
 - i. STEINER; ALTMAN; HANSON:
 - (1) Why did Altman not include this information?
 - (2) Part of continuing plot deliberately to hide recusal discussions
 - (3) Who told Steiner not to fill Altman in on any other information that Altman didn't remember by himself (Altman's private lawyer or Hanson)?

- 86. March 3, 1994: Bentsen calls DeVore after seeing 3/3 Post story revealing 10/14 meeting
 - a. Bentsen asks whether DeVore briefed him on fall meetings; DeVore says no
 - b. BENTSEN:
 - i. Why so worried?
 - ii. Did he also ask Hanson, Steiner, or Altman?
 - c. HANSON; STEINER; ALTMAN:
 - i. Was Bentsen involved in any of the discussions re Altman's testimony?

- 87. March 3, 1994: Altman's second correction letter to Riegler
 - a. I was asked about any contacts I have had; Hanson got approval of Foreman before we went over; no discussion on the substance of the case



- 88. March 11, 1994: Altman's third correction letter to Riegler
 - a. I told you about one meeting I had which addressed only generic RTC procedures involving statute of limitations; one or two days after this meeting, there was a very brief discussion on the issue of recusal for 5 minutes with

Who interviewed press re letters ??

Ickes and maybe one or two others. The purpose was to provide notification; at neither meeting did I seek advice, nor was it given.

i. ALTMAN:

- (1) How can he possibly fail to mention recusal discussion at the 2/2 meeting?
- (2) How can he state that he did not get advice at 2/2?
- (3) Was the 2/3 meeting with Ickes et al. the incidental contact he had in his Q&A?
- (4) What about the other 2/24 contacts, including his discussion re recusal with Ickes on 2/23?

89. March 21, 1994: Altman's fourth correction letter to Riegler

a. Says he is disclosing every contact regardless of significance; before the end of 2/2 I announced that I was weighing recusal; after this meeting I spoke with McLarty with the same message; 2/23 I told Ickes on telephone that I would announce I was stepping down from RTC; around same time I bumped into Nussbaum at WHS and he told me that WHS would submit RTC nominee soon.

b. ALTMAN:

- i. Who assisted him with the preparation of each of these letters?
- ii. Who else saw any of these letters or contributed to their substance?
- iii. Get him to admit that these responses were responsive to the committee's questions; then find out why he didn't provide these fuller responses during his 2/24 testimony

90. Miscellaneous

a.

FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury

i. NUSSBAUM:

3) B BERTSEW TESTIMONY

(1) [FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury]

ii. ALTMAN:

(1) [Redacted]

b. ROELLE:

i. [Redacted]

c. MCLARTY:

i. In his 302 he said he would have to check his notes to determine whether he was at any meetings with the Clintons where the referrals were discussed in fall 1993; did we ask him to do so?

d. Secretaries to all key players:

- i. VERONICA DAWSON (Hanson)
- ii. Altman

91. Summary list of potential witnesses to be questioned:

- a. Affleck-Smith
- b. Altman
- c. Altman's secretary
- d. Barker
- e. Bentsen
- f. Bowman
- g. Caputo
- h. Casey
- i. Castleton
- j. Cavanaugh
- k. President Clinton
- l. Mrs. Clinton
- m. Curtis
- n. Fran Davis
- o. Veronica Dawson (Hanson's secretary who kept her daytimer)

p. DeVore
q. Dudine
r. Eggleston
s. Foreman
t. Griffin
u. Robin Gross
v. Hanson
w. Hinds
x. Hubbell
y. Ickes
z. Iorio
aa. Katsanos
ab. Klein
ac. Knight
ad. Kosinski
ae. Kulka
af. Levy
ag. Lindsey
ah. Logue-Kinder
ai. Ludwig
aj. Lyons
ak. McLarty
al. Keith Mason
am. Myers
an. Newman
ao. Nolan
ap. Nussbaum
aq. Nye
ar. Podesta
as. Roelle
at. Ryan
au. Schloss
av. Sloan
aw. Steiner
ax. Stephanopoulos
ay. Stern
az. Terzano
ba. Whiteacre
bb. Williams
bc. Williams' Secretary
bd. Yanda

92. Documentary evidence possibly needed:

- a. WHS entry records to prove when the 2/3 meeting in Williams' office took place
- b. Paula Casey phone records to/from Lindsey around 10/14 (Bittman is getting this information)
- c. Roelle: the dates are very unclear from his 302 (but may be improved in his IG interview); if we grand jury him, let's ask for any logs that will help with dates
- d. RTC Early Birds for all relevant periods since they reflect what was driving the substance of many of these contacts. We have 9/30 and 10/13 (DOT 2-3)
- e. DOT evidently bates stamped some additional production between their Fiske production and their OIG subpoena production; some of these documents are referred to in OIG interviews (such as Hanson's notes of conversations with Curtis 6190); where did they go? Let's get them
- f. March 1, 1994 memo from Ickes to HRC passing on Eggleston's 2/28 memo to Ickes re WHS contacts. We have it, Ickes 10.
- g. Whiteacre's documents and possibly the entire Arkansas Democratic office's records on contacts
- h. Cutler's 7/27/94 letter to Gonzalez about whether Whitewater was mentioned in Clinton's meeting with Tucker on 10/6/94
- i. At least for Altman and Hanson, we don't have their complete daytimers for all relevant periods, i.e., after 2/2 and before 10/14, Altman March 23, 1993; make sure we get these for all key players. Also need calendar for Bentsen especially around 9/29 (did he meet with Hanson re criminal referrals as stated in Early Bird memo) and during 2/94 (2/1; 2/3; Knight meeting). We have Altman's computerized calendar for all months but still need 3/93. Get Hanson's "To Do" cards for all other relevant dates (we only have 4 of them at DOT 134-37); Get Hanson's call sheets for all relevant dates (the ones we have appear at DOT 366-82). Get DeVore's daytimers (kept by him and his sec'y) for 9/30-10/6/93; need his from 10/14 also (we have his sec'y's copy) (Others appear at DOT 2963)
- j. RTC provided additional written responses to 2/24 hearings; we should get them
- k. The March 11, 1994 letter to Riegle. We need to be sure that we have the version that Riegle received. The 3/8 version doesn't have the assertion that he did not receive advice on recusal. Check with Riegle's office? Critical

because this may be the most likely basis for a 1001 prosecution.

- l. Secret Service entry records for any RTC people going over to DOT (confirm Roelle was at 10/6 meeting with Altman)
- m. Telephone records of calls between DOT, RTC, and WHS on key days to further lock in times/dates/and fact of contacts
- n. Secret Service entry records for 2/3 for Altman and Hanson to get time of entry for meeting
- o. Need to ask every witness whether they have a diary or daytimer that they have not yet provided to us
- p. Dee Dee Myers took notes at the 3/1 WHS meeting reviewing Altman's testimony; do we have these? Yes, E00914.
- q. Get all documents provided by witnesses, DOT, WHS, and RTC to House and Senate this summer
- r. Consider getting all documents re preparation for summer hearings and follow up to hearings
- s. Senator Bond states that a search of Bentsen's office by IG revealed additional scheduling documents showing 2/1 and 2/3 meetings with Altman and Hanson; do we have these? Yes, DOT 6506-22.
- t. Hanson has a handwritten note used to prepare Bentsen for House Appropriations hearings where she wrote that Hanson and Altman consulted with Bentsen in advance of 2/2 meeting; do we have this note? Yes, DOT 198
- u. Senate investigators' report on post-hearing follow up with Hanson re her shaking her head after Bond's question

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