

**Memorandum**

**Office of the Independent Counsel**

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To: All OIC Attorneys

Date: 4/22/98

From: HRC Team

Subject: HRC Order of Proof

As part of our submission today, here is a rough outline of an order of proof for a proposed trial of an indictment of Hillary Rodham Clinton and Webb Hubbell:

**Order of Proof**

Irons, Steve

GJ 5-21-96; 4-9-98

- White collar crime supervisor in Little Rock field office
- Was familiar with certain S&L failures and cases in Arkansas
- He arrived shortly after the McDougal acquittal in 1990
- Continued to receive information about MGSL and other possible criminal activity by McDougal, Hale, Tucker, etc.
- Receipt of C-0004 and conversations with the USAO, which decided to hold it in abeyance until after the election - which Irons agreed with
- Information about David Hale and CMS
- SBA referral
- New Jersey SBA investigation which touched Hale
- Conversations with USAO re: obtaining search warrant at least one week before 7/20/93
- Affidavit for search warrant given to Magistrate on 7/19/93
- Obtained search warrant on 7/20/93. One of the files named in the warrant was the Master Marketing file
- Executed search warrant on 7/21/93
- Hale investigation/search warrant/indictment
- Knowledge during the summer of 1993 that Lewis and the RTC would be send additional referrals
- The 9 RTC criminal referrals
- Paula Casey's almost immediate statement that she was going to recuse because of her relationship with Tucker, etc.
- The recusal of Casey-11/93
- McKay and DOJ take over
- Interviews
- 1/11-13/94 Little Rock grand jury subpoenas - 30+
- Allegations of shredding at the RLF