

- Replacement of Gerrish & McCreary with RLF
- Representations by, misrepresentations made, and failures to disclose in conversations with Hubbell, and perhaps others
- After the case assigned to RLF, interactions with RLF/Webb when questions were raised by others within her agency
- The case itself and Hubbell's role
- Prior representation of MGSL by RLF, including the work done thereon
- Seth Ward

Clerk, US District Court

- Selected pleadings which bear on the Hubbell-Ward-Rose Law Firm issues

RLF Records Custodian

- Activity shown on the RLF invoices to the RTC, including the reading of the Borod & Hugging report by Hubbell, the attendance of RLF attorneys at the McDougal trial, Hubbell's conferences with Heuer, etc.

FBI Lab Witness

- Hubbell's prints on RLF copy of Borod & Hugging Report

## **XII. 1992 CAMPAIGN**

Lynch, Loretta

[GJ 2-1-96]

- San Francisco Attorney
- Worked in Presidential campaign in early 1992 to summer of 1992 in Little Rock
- Inquiries generated as a result of Jeff Gerth's visit to the ASD on 2/11/86
- Her efforts to learn the facts about WWDC, including meetings with Kennedy, conversations with Lyons, etc.
- Her efforts to learn of HRC's work representing MGSL in 1985 and 1986; including conversations with Webb Hubbell and Vince Foster; and questions posed to HRC via Susan Thomases, and perhaps Diane Blair; her contemporaneous memos and notes
- Massey would not back up the story that he was the one who brought the business of MGSL to the RLF
- Hubbell kept changing stories
- Other issues impacting HRC and WJC during 92 campaign
- Lynch, Thomases meetings with Gerth to try to get him to hold off on his article
- Activities on Saturday evening, 3/7/92, when the Gerth story hit the wire
- She received documents from Webb Hubbell in the RLF parking lot that night
- Statements generated by the campaign for Heuer, Bassett, etc.
- HRC's 2-page campaign statement
- Lynch, Blair meeting with Jim McDougal and Sam Heuer at Heuer's office on 3/11/92.
- Blair's memo, including WWDC and the "jogging" incident
- Campaign's release of some information that was not completely accurate

- Betsy Wright's role

Thomases, Susan [?]

[GJ 2/96]

- Her conversations with Webb Hubbell re: HRC's work for MGSL; and her contemporaneous notes
- Her 92 campaign role.
- Her role in the 1993 Vince Foster documents matter
- She and Webb visited HRC at White House on about 7/26/93

Wright, Betsy

[GJ 2/96]

- Chief of Staff for Governor Clinton in the 1980's
- Would have discussed the 7/2/86 handwritten memo from Beverly Bassett, attaching the FHLBB letter to MGSL with Governor Clinton
- Everybody knew that MGSL was in trouble and that McDougal was on his way out
- Her 7/14/86 handwritten memo to Governor Clinton to the effect, "Whitewater stock - Jim McDougal's company - do you still have - if so I'm worried."
- The 1986 Governor's race
- The 1987 exploratory efforts regarding Bill Clinton running for President in 1988
- The decision in July 1987 not to run in 1988
- Deputy chairperson of the 1992 Clinton Presidential campaign
- Her role in the 1992 campaign as the Secretary of Defense, running the defense department and war room
- Gerth inquiries and her actions
- Various campaign memos
- Weeks before the 1992 election, received a telephone call from a person in California. Caller relayed substance of recent conversation at a Kansas City cocktail party, where he heard that a referral about an S&L officer that would implicate the Clinton's had been sent to the federal prosecutor in Arkansas
- Wright discussed what she described as this "very cryptic rumor" with Mrs. Clinton during that time period [see White House/Treasury Contacts memorandum, p. 42, footnote 23].

Blair, Diane

GJ 7-18-96

- Worked in the 1992 campaign
- FAX from Webb regarding Vince and HRC working on HRC's statement

Court Reporter - LRGJ

- Testimony of Hubbell about the campaign and taking records out of the firm (Dec 95 Tr.)

### XIII. TRANSITION

Heuer, Sam

GJ 4-1, 5-20, 10-8-97

- Representation of Jim McDougal in 1989-1990

- 1990 letter to Webb Hubbell, wanting to talk to Seth Ward; and advising Hubbell that Ward had possible criminal exposure
- The Borod & Hugging report
- Other contacts during that first representation
- Heuer's lunch meeting with HRC shortly after the McDougal 1990 trial
- Heuer's conversations with Hubbell regarding McDougal's 1990 trial
- 1992 meeting with Blair, Lynch and McDougal - 3/11/92
- Threatening letter from Blair to him shortly thereafter regarding Jim McDougal, giving the position of the Clintons
- The "closing" of the sale of the Clintons' stock in Whitewater to Jim McDougal in December 1992
- The role of Jim Blair in the closing
- The role of Vince Foster in the closing
- The "\$1,000" amount allegedly paid by McDougal to the Clintons; the money having come from Jim Blair to Heuer's escrow account
- Contacts from McDougal in September 1993, after Hale had visited him in Arkadelphia
- Heuer contacts with the Little Rock US Attorney's office
- Heuer conversations with Jim Blair relating all of this
- His further conversations to and from Jim Blair
- The lapse of his representation of McDougal
- His calling McDougal on the morning after the 825 indictment saying he wanted to get back in the case
- Actions and inactions, and outside influences during his representation of Jim McDougal
- The role of David Kendall and his law firm in assisting Heuer. . .

#### XIV. JAN-JUL 93

Lewis, Jean

GJ 10-21-97

- In the Tulsa office at the time of the Gerth article; MGSL was already on a list of S&L's to be revisited
- Directed by her local supervisor and someone in Washington to go to Little Rock to determine if Whitewater had caused MGSL a loss
- Visited warehouse and other places in Little Rock in April, 1992, which led to Criminal Referral C-0004
- C-0004 sent directly to the Little Rock U. S. Attorney and Little Rock FBI on 9/1/92
- During the April 1992 visit, it was apparent that there were possible other criminal violations at MGSL. Instructed to "diary up" the further look at MGSL for May 1, 1993
- Nothing heard regarding C-0004
- She and another agent visited Little Rock, Sheridan, Benton, and Yellville May 31-June 4, 1993; and she began preparing additional criminal referrals during the summer of 1993
- Advised the U.S. Attorney's office and the FBI that other referrals were in the progress of being written
- These were in progress on July 20, 1993, the date of Vince Foster's death