

Renovation file

Screened by NARA (RD-F) 07-16-2018 FOIA #56806 (URTS 16304) DOCID: 70105030

STATEMENTS ON RENOVATION FILE

3/31/96

CHESTON NOTES (7/7):

Decide CL pers'l files to Dl's lwyr. --  
tax + invest, fin'l

BN or CS or ?

Call MW. Finished search. Sent VF 2  
[illegible]. Want CL pers'l files out of here  
too. (defined as fin'l;tax;investmt

She comes. fairly soon. They look in drawers w/  
[illegible] etc. Most in draw lt side.  
Review. Mostly MW, bad back. Put in box.

Castleton & MW carry over to residence. } 20 min. at 5:30.  
[illegible] in outer office  
asked to help carry

Files outside -- which forgot about -- incl  
some pers'l VF.

Sent over 1 file re renovation of residence. Returned a few days  
later. SN told BN came back }  
not pers'l file.

\* \* \*

Lock office. Go to funeral next day.

MW or SN told file came back.

Ck w/ DK wh on inventory --

Maybe said to MW -- no -- stays.  
But related renovation file  
may've gone.

DK --  
1) wh. returned  
2) wh. have on  
list file  
renovation

SN or MW told BN a file re: WH residence came back  
next wk.

Wkend in Maine

SHERBURNE NOTES (undated):

Call MW -- finished search  
got Foster file take Clinton  
personal.

Open drawer -- mostly together  
told MW to look around

Remember sent over file concerning  
residence renovation.

\* Steve or someone told BN came  
back.  
20 minutes.

Spend weekend in Maine

SENATE DEPOSITION, 7/13/95 (pp. 406-412):

Q In the files, did you check to see whether commingled  
in particular files were official documents?

A We sent over -- we did check to see whether we were  
sending over personal records as opposed to White House  
counsel records. And we made an effort to send over  
solely personal records. And actually, one record was  
sent over and returned.

Q Which record was that?

A A record with respect to the residence, a residence  
file.

Q Who returned it?

A I think Ms. Williams returned it.

Q When did she return it?

A Sometime thereafter.

Q When thereafter?

A Within a matter of days.

Q Before the documents went to Williams & Connolly?

A I don't know. I don't remember at this point.

Q But you're quite sure that Ms. Williams returned the document?

A No, I'm not quite sure Ms. Williams returned the document. I believe Ms. Williams returned the document. A residence file was returned. There was a file that was returned because we were making an effort to send over solely personal documents which had been used -- yes -- which were in the White House counsel's office because there was an official purpose.

That purpose was now over. Vince Foster was dead. We weren't going to be using those files now so we sent over the personal records to the Clintons and their personal attorneys.

Q Did Ms. Williams tell you who had made the decision to return that document?

A No.

Q Did she say anything about how she came to return it?

A It's just some statement, merely that this concerns the residence. It's not really a private file, although the Clintons live in the residence --

MR. PEDOWITZ: Can we take a break for a minute?

MR. CHERTOFF: Can I hear the answer to the question?

THE WITNESS: And consequently the documents should remain in the White House counsel's office.

BY MR. CHERTOFF:

Q Can you remember any other discussion with Ms. Williams concerning this occasion when she returned the document?

MR. PEDOWITZ: I really would like to talk to my client for a moment and he'll answer the question.

(Witness conferred with counsel.)

BY MR. CHERTOFF:

Q You've had an opportunity to consult with counsel?

A Yes.

MR. CHERTOFF: Can I get the last question read back?

(The reporter read the record as requested.)

THE WITNESS: As I indicated in my testimony, look back at the record, I'm not certain I even had this discussion with Ms. Williams. I'm not positive. It's either Ms. Williams or Mr. Neuwirth I had a discussion with.

I remember a discussion with regard that a residence file, a file concerning the residence should remain in our office rather than be sent over as part of the Clinton personal files to the Clintons and their new personal attorneys. And I had the discussion either with Ms. Williams or with Mr. Neuwirth. It was one of them. That's what I remember.

BY MR. CHERTOFF:

Q This conversation occurred after the documents had been taken out on the 22nd; correct?

A Yes.

Q And it's very hard to confuse Mr. Neuwirth and Ms. Williams physically, isn't it?

A Of course, but they're both -- they're both involved in the subject matter. The reason Mr. Neuwirth is involved in the subject matter is because Mr. Neuwirth was working on matters concerning the residence. He had been working with Mr. Foster concerning matters of the residence and he was working with Ms. Williams who was involved in matters concerning the residence. And one of them said that file should remain in the White House counsel's office.

Q Who brought the file --

A So why is that so strange, that it's hard to confuse Mr. Neuwirth and -- Ms. Williams and Mr. Neuwirth?

Q Who brought the file back?

A That I don't remember. Either Ms. Williams or Mr. Neuwirth, even though they're quite distinct, one of them brought the file back.

Q Where did they bring it back from?

A I don't know because I wasn't there when the file was brought back, and I'm not sure it was brought back from the residence or from Ms. Williams's office where this file was. It was a residence file, and we made a determination that it was not a personal file that we should send to the Clintons' personal lawyers.

That's all that happened here. We came across a residence file which was returned to Mr. Foster's office for Mr. Neuwirth to work on in the future, just like Mr. Foster had worked on residence matters with Ms. Williams and Mr. Neuwirth.

Q It was originally a Foster file; right?

A I'm not positive it was in his office. It was either in his office or Ms. Williams's office but it was a matter he worked on.

Q But it originated in Mr. Foster's office?

A I'm not 100 percent positive of that. It may have originated in Mr. Foster's office and gone out and was returned or it may have been in Ms. Williams' office and was put into Mr. Foster's office, but it was a residence file. There was a discussion as to whether this is a personal file that should go to the Clintons and their new personal attorneys and it was determined that it was not a personal file. It was a file that should stay in the White House counsel's office so we could continue to work on that matter.

SENATE HEARING, 8/9/95 (pp. 185-187):

Sen. Bond. And, in fact, after those files did go over to the residence, they must have been reviewed because one file was returned, was it not?

Mr. Nussbaum. What I remember about that Senator, is that at some point a file was returned, but not necessarily from the residence. I am not positive at this point where the file was returned from. It could have been from the residence, or it could have been from Maggie's office, perhaps.

Sen. Bond. But you think Ms. Williams returned it?

Mr. Nussbaum. I think Ms. Williams returned it or was involved in the return in some fashion. It was file that had to do with the decorators or the ushers or something, something to do with decorating the White House, which was sort of an official thing. And that file came back. I am not positive if it was one of the files that we sent out. I just don't know. I just don't remember at this point.

Sen. Bond. So the file just came back to you out of thin air?

Mr. Nussbaum. Well, somebody -- my best memory is Steve [Neuwirth], who was working on these issues with Foster -- somebody at that point told me that a file had been returned or a file had come back with respect to this issue. That's what I remember about it.

Sen. Bond. Was it your understanding that that file had been in Mr. Foster's office, had left, and was coming back?

Mr. Nussbaum. My memory today is vague on that, on that subject. I just -- I just don't remember. I remember a file came back, and it could have been a file from Mr. Foster's office. I don't say it couldn't have been. It was a file with respect to the residence, with respect to the decoration of the residence.

Sen. Bond. But you do know that the files did go to the Clinton residence?

Mr. Nussbaum. That's correct.

Sen. Bond. If that file had been one of those that had gone up there, obviously somebody had to take some action to send it back.

Mr. Nussbaum. Well, somebody made a judgment, yes, Senator.

Sen. Bond. Somebody made a judgment to send it back.

Mr. Nussbaum. Absolutely. And somebody must have looked at it, made a judgment. If it was that -- I don't know if it was that -- but if it was that, somebody looked at it and made a judgment that this is not a personal file and

sent it back.

Now, you know, Senator, there has been a lot of talk about this. You know, I understand that no one, at least the President and the First Lady, did not review files at the residence. Let me say to you, Senator, as far as I am concerned, it would have been totally proper for the President or the First Lady, if they wished, to review their personal files. I find nothing wrong or suspicious about that.



Maggie Williams

OIC INTERVIEW, 10/28/94, p. 16-17, 37-38:

- Q Did you find anything else to add to the stack?
- A That's all I remember. I don't know if I picked up the file or if I asked him about the file. I asked about the renovation file. I asked Bernie about it, the house, the private quarters renovation file.
- Q What did you ask him?
- A I said, either, "Is that file in here with the personal ones?" or whatever.
- Q And what did he say?
- A He said, "That belongs to the office, the counsel's office. That's something that we're working on." But I thought since it was, you know, in their house, but, you know -- so I was just trying to think of stuff that was happening.
- \* \* \*
- Q Was there a time that you returned a document or documents to the counsel's office or to Bernie Nussbaum, indicating that they didn't belong with the personal papers?
- A I don't remember that, but I wouldn't have done that on my own, I think.
- Q Do you remember somebody telling you to do that?
- A No. I'm just trying to think how I would decide that it wasn't -- shouldn't have been in -- I don't remember returning anything to Bernie. I do remember the discussion about a renovation file.
- Q Now, you indicated that occurred on July 22nd?
- A Yeah. Right.
- Q Was that renovation file already in the pile to be transferred or did you see the renovation file?
- A No. I remember asking about it. I don't remember necessarily seeing it in the pile. I didn't look through the pile that was there FOIA(b)(7)(D) the only thing that I can remember, in terms of specifically,

you know, a file that was marked, you know, that I would remember it, would be the one I picked up, the tax related file. I remember that they said "President," whatever. Everything else I didn't even pay any attention to.

Q You don't recall anything else about a document being returned to the counsel's office by you?

A I don't recall. A document?

Q Or a file.

A I don't recall.

SENATE DEPOSITION, 7/7/95:

Q And did you say, Bernie, I found something marked "taxes"; what should I do with it?

A I put it on the stack of files. I put it on the stack of files.

Q And then what happened?

A I may -- I remember having a discussion with him about the renovation files. And I said should I take the renovation files, and he said no, that has to do with the White House counsel's office. So I remember that was the only discussion, and then I remember either leaving to get a box or leaving because I took a few more calls.

. . .

SHERBURNE NOTES (undated):

MW asked abt Renovation file ----> asked Bernie if XXX personal. BN said No, that is a working file.

SHERBURNE NOTES (undated):

Renovation. Couldn't take seriously b/c No public funds. Kaki had decorator's temperament. VF got overly serious. Well on way to being resolved at time of death.

WJC & HRC want to decorate  
Usher trying to please  
Decorator from Ark w/ unlimited budget

If cover one, need one or two  
extras in case grape juice

interviewed by FBI about issue  
b/c of note -- exchanged  
mat'l w/ Neuwirth

CHESTON NOTES (7/15):

ushers/renov -- SN more involved aft VF death.  
MW involved bef.  
Hard time worrying about -- pillows, no public \$,  
Kaki's decorator temperament. VF viewed  
overly seriously.



Steve Neuwirth

FD-302, 5/13/94

Neuwirth said that he has no knowledge of how any documents were removed from Vincent Foster's office with the exception of one file regarding the "White House ushers and White House renovation" matter that was assigned to him from Vincent Foster after Foster's death.

CHESTON NOTES (7/11):

Ushers/renov -- wkg on @ time death. Given file by BN or MW the following wk. think after Mon. > 1st Lady or MW asked if SN ld take over proj. Had till doc prod. -- As was. Yellow env w/ file fldr, + papers inside + outside fldr. Was VF's file on renov + ushers. Dont recall from 22nd review.

Office Public Integrity -- shown a doc from file. Q re [illegible] line in note.

Given file aft told he picking up wk. -- by MW and/or BN. If got from MW, wldve told BN been asked to do it. Disc'd w/ BN HRC & MW had asked SN to pick up some subst wk VF had been doing.

VF, MW + SN v close wkg relat. Wldntve surp'd if she had a VF file. VF ldve left file w/MW to look at. MW was very involved w/ -- pt person on renovation.

\* \* \*

No wk on ushers/renov till got file -- knew 0 about it. XXX MW was involved in renov. process/press decisions aft. SN took over proj. Docs in file show MW @ earlier mtgs when issue came up.

Didnt rec any other files from VF office.

SHERBURNE NOTES (undated):

Matter of renovation of WH and ushers office working on [illegible] VF at time he died. Matter given to Neuwirth by BN or MW.

Best guess got it > day note found.

Yellow envelope. File folder inside.  
Documents inside and outside  
of file folder.

Never disturbed the integrity of this file.  
Never got anything else told came from  
VF office.

Roy Neel/SN interviewed by PIS at DOJ.  
Showed doc from file to investigators.

Either BN or MW told SN being assigned.  
BN said First Lady & Maggie wanted Neuwirth to  
pick up work.

MW, Neuwirth, VF had very close relationship  
MW was person Neuwirth consulted with  
Would not have been abnormal for Maggie  
to have had file.

Understood MW was point person  
handled in residence by usher's  
office

\* \* \*

Never worked on it b/4 got renovation  
file. MW Heavily on relations w/ press,  
how explained > SN got  
involved. Could tell MW  
involved < SN took over from  
documents in file.

Never received any other file from VF  
office.






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

# Memorandum

# Office of the Independent Counsel

To : DIC John Bates

Date 4/3/96

From :  CI Coy Copeland

Subject: UPS Shipping Number  
NY 134-658

On 4/3/96, ANTHONY ADKINSON, Manager, Loss Prevention Department, United Parcel Service (UPS), Louisville, Kentucky, telephone 404-828-6938, telephonically advised UPS Shipping Number NY 134-658 is assigned to the National Counsel for Jewish Women, 53 West 23RD Street, Sixth Floor, New York City, NY 10010.

ADKINSON further advised there is no way UPS can look at one of the company's billing labels and determine to whom a particular package was shipped. This label is printed by the shipper to provide UPS with the billing identity of the shipper and to identify this particular package in the shippers records.

ADKINSON explained the third line of this particular label " G ID# HC" was printed by the shipper and only has meaning to the shipper for internal control.

ADKINSON further explained that the National Counsel for Jewish Women is what UPS classifies as a "Manifest Shipper" due to the large volume of packages shipped daily.

A "Manifest Shipper" provides UPS a computer generated manifest each day listing all of the packages shipped on that day. This manifest lists the shippers control number (in this case HC), the first three digits of the addressees zip code and the total weight of the package. This is all of the information that UPS needs to bill the shipper on a weekly basis. The package being shipped will have a complete address for delivery but there is no record of any kind maintained by UPS showing this delivery address.

ADKINSON assumed the shipper would have records to identify the person or company the shipper has designated "HC" plus a complete address.



THE WHITE HOUSE  
WASHINGTON

April 3, 1996

BY HAND DELIVERY

Brett M. Kavanaugh  
Associate Counsel  
Office of the Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490-North  
Washington, D.C. 20004

Dear Brett:

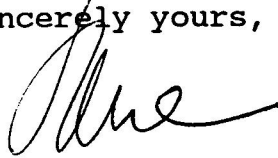
You have informed us that the Independent Counsel has  
an interest in

Brett M. Kavanaugh  
April 3, 1996  
Page 2

As with documents previously produced, we understand that your office will treat these documents and the information conveyed in this letter as confidential and entitled to all protection accorded by law, including Federal Rule of Criminal Procedure 6(e), to documents subpoenaed by a federal grand jury.

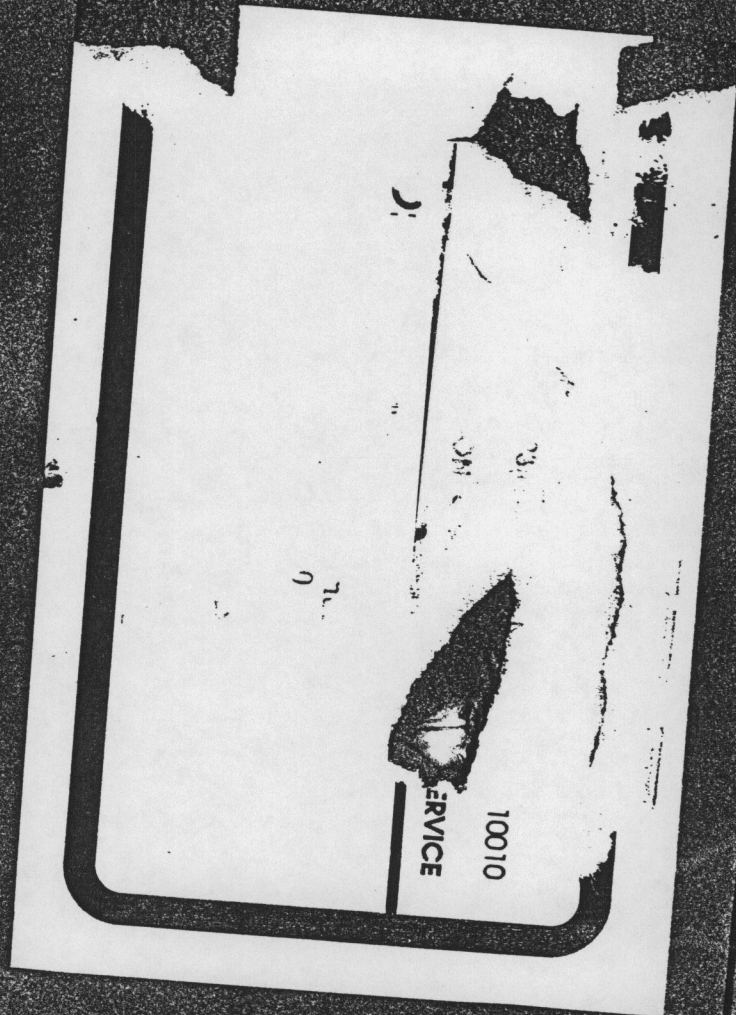
Please feel free to call me if you have any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Jane C. Sherburne', written in a cursive style.

Jane C. Sherburne  
Special Counsel to the President

Enclosures



\*\*\*\*\*  
 UPS SHIPPER NO.  
 NY 134-658  
 ID# HC  
 \*\*\*\*\*

  
 F 127385

FRAGILE



**JiffyLite® R#6**  
Mailable by Sealed Air  
• 100% Recycled Paper Fiber  
• 50% Recycled Plastics  
• Min. 15% Post-Consumer  
Content of Each



**JiffyLite® R#6**  
Mailable by Sealed Air  
• 100% Recycled Paper Fiber  
• 50% Recycled Plastics  
• Min. 15% Post-Consumer  
Content of Each



F 127386

Page Denied

Page Denied

Page Denied

Page Denied



Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied



Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied



Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied



Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied



Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied



Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied



Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied

Page Denied



Page Denied



Office of the Independent Counsel

1001 Pennsylvania Avenue, N.W.  
Suite 490-North  
Washington, D.C. 20004  
(202) 514-8688  
Fax (202) 514-8802

May 8, 1996

Ellen R. Joseph, Esq.  
Kaye, Scholer, Fierman,  
Hays & Handler, LLP  
425 Park Avenue  
New York, NY 10022-3598

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

**Via Facsimile: (212) 836-7156**


Dear Ms. Joseph:

This will confirm our conversation this morning in which you  
advised that

Thank you again for your cooperation.

Sincerely,

KENNETH W. STARR  
Independent Counsel

By:   
Steven M. Colloton  
Associate Counsel

enclosure

Page Denied

RETURN OF SERVICE (1)

RECEIVED BY SERVER	DATE 5/8/96	PLACE Washington, DC.
SERVED	DATE 5/8/96	PLACE Washington DC via fax to New York (then mail)
SERVED ON (PRINT NAME)  ELLEN R. JOSEPH, ESQ.		

SERVED BY (PRINT NAME) NEILLE MALLON RUSSELL	TITLE STAFF ASSISTANT
---	--------------------------

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER(2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on May 8, 1996 Neille Mallon Russell  
Date Signature of Server

Washington, D.C.  
Address of Server

ADDITIONAL INFORMATION

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

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal Rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

Page Denied

TELECOPY COVER SHEET

**OFFICE OF THE INDEPENDENT COUNSEL**

1001 Pennsylvania Avenue, N.W., Suite 490N

Washington, D. C. 20004

telephone (202) 514-8688

facsimile (202) 514-8802

Date: May 8, 1996

TO: Ellen R. Joseph, Esq.

Company Name: Kaye, Scholer, Fierman, Hays & Handler, LLP

Fax Number: 212-836-7156 Telephone Number: 212-836-8450

FROM: Steven M. Colloton, Associate Independent Counsel

Number of Pages: 4 (including this cover sheet)

Message: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**CONFIDENTIALITY NOTE**

This facsimile is intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. Dissemination, distribution, or copying of this facsimile or the information herein by anyone other than the intended recipient, or an employee or agent responsible for delivering the message to the intended recipient, is prohibited. If you have received this facsimile in error, please notify us immediately by telephone and return the facsimile by mail.

a:\faxform.nmr

\*\*\*\*\*  
\*\*\* TX REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

TX/RX NO 1680  
CONNECTION TEL 82128367156  
SUBADDRESS  
CONNECTION ID  
ST. TIME 05/08 14:09  
USAGE T 01'03  
PGS. 4  
RESULT OK

TELECOPY COVER SHEET

OFFICE OF THE INDEPENDENT COUNSEL

1001 Pennsylvania Avenue, N.W., Suite 490N  
Washington, D. C. 20004  
telephone (202) 514-8688. facsimile (202) 514-8802

Date: May 8, 1996

TO: Ellen R. Joseph, Esq.

Company Name: Kaye, Scholer, Fierman, Hays & Handler, LLP

Fax Number: 212-836-7156 Telephone Number: 212-836-8450

FROM: Steven M. Colloton, Associate Independent Counsel

Number of Pages: 4 (including this cover sheet)

Message: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER, LLP

A NEW YORK LIMITED LIABILITY PARTNERSHIP

425 PARK AVENUE

NEW YORK, NEW YORK 10022-3598

901 FIFTEENTH STREET, N.W.  
WASHINGTON, DC 20005-2327  
(202) 682-3500  
FAX (202) 682-3580

(212) 836-8000  
FAX (212) 836-8689

NINE QUEEN'S ROAD CENTRAL  
HONG KONG  
852-2845-8989  
FAX 852-2845-3682

1999 AVENUE OF THE STARS  
LOS ANGELES, CA 90067-6048  
(310) 788-1000  
FAX (310) 788-1200

WRITER'S DIRECT DIAL NUMBER  
(212) 836-8450

April 17, 1996

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

Special Agent James T. Clemente  
Office of the Independent Counsel  
Suite 490 North  
1001 Pennsylvania Avenue  
Washington, D.C. 20004

Re:

[Redacted]

Dear Mr. Clemente:

Pursuant to our conversation today, this will confirm that

[Redacted]

Sincerely,

  
Ellen R. Joseph

ERJ:ak

cc:

[Redacted]



MEMORANDUM

TO: John Bates  
Steve Colloton  
  
FROM: Brett Kavanaugh  
  
RE: Renovation File  
  
DATE: January 21, 1996

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

Given the discovery of the Rose billing records in the residence in August 1995 by Carolyn Huber, we have new reason to suspect that not all "Clinton personal" documents that were in Vince Foster's office on July 20, 1993, made it to Williams & Connolly on July 27, 1993.

There are two basic issues: (1) were any documents (including Clinton personal documents) removed from Foster's office prior to the Nussbaum search on July 22, 1993; and (2) were any of the Clinton personal documents that were in Foster's office during the search on July 22, 1993, not provided to Williams & Connolly on July 27, 1993.

On the latter issue, we have testimony from Tom Castleton suggesting that the First Lady may have planned to review those documents. One obvious possibility, therefore, is that the First Lady or someone else did review the Foster documents while they were in the residence from July 22, 1993, to July 27, 1993, and removed some of the documents. (That itself would not have been a crime.) Another possibility is that Maggie Williams examined and removed some of the documents in her office or the First Lady's office on July 22, 1993, after she had taken them from Foster's office and before she and Castleton had taken them to the residence.

A relevant mystery

the Senate hearings is whether Foster's "renovation" file was "returned" to Bernie Nussbaum and/or Steve Neuwirth after it apparently was taken from Foster's office by Maggie Williams on July 22, 1993. If so, that would seem to prove that someone reviewed the documents again after they had been taken from Foster's office. The testimony on the renovation file issue is confusing and/or incomplete, however. Maggie Williams has no recollection at all about it; Nussbaum is very confused and does not appear to be certain of his answers; and

The renovation file has become much more interesting to me in recent days for three reasons: (1) Steve C. correctly pointed out some troubling inconsistencies in Nussbaum's Senate testimony on the issue; (2) the discovery of the billing records with Foster's handwriting on them lends new credence to the theory that someone reviewed the Foster documents in the residence in July 1993; and (3) the interview notes provided to me by Sheila Cheston on January 19, 1996,

reveal a fair degree of interest in that file on the part of the Counsel's office. Indeed, Sheila volunteered to me that she "never really figured out the renovation file issue."

In light of all of this, it seems to me that we may want soon to question Neuwirth on the issue. Neuwirth may have more information on it -- and he has shown a willingness to tell the truth (despite an apparent unwillingness to accept the implications of his testimony).