

Roelle - RTc Productions

Sort BY DATE

RTC Production Index

16-Feb-95

Bates #	Source	Date	Description
663			
24252429	" 03/04/94 memo from Binkley and Collishaw to Kulka re: Disclosure of Madison Guaranty Inventories of Records (N/A)		
36293631	WDC RTC	1/1/05	Same document as 2568 - 2570 described above (N/A)
49664967		10/10/83	letter from Giroir to McDougal re: invoice for the Rose law firms services in connection with First National Bank of Huntsville v. Madison Bank & Trust (N/A)
29873070	WDC RTC	3/4/86	FHLBB Report of Examination for Madison Guaranty Saving and Loan Association (N/A)
180019	KC PLS	4/3/86	Copy of check #0458 dated 04/03/86 from Capital Management Services to Susan McDougal signed by David and Linda Hale (N/A)
260027	KC PLS	4/7/86	Cashier Check # 4878 for \$111,524.21 payable to Stephens Security Bank (N/A)
320033	KC PLS	4/9/86	Check # 1256 for \$7,837.64 from James MDougal to Charles James (N/A)
400041	KC PLS	4/21/86	Check # 1280 from James McDougal to International Paper Corp. for \$25,000 (N/A)
34	KC PLS	4/30/86	Madison Guaranty Bank Statement dated 04/30/86 for James and Susan McDougal for Checking Account # 424 (continuation of 0030 - 0031 above) (N/A)
300031	KC PLS	4/30/86	Madison Guaranty Bank Statement dated 04/30/86 for James and Susan McDougal for Checking Account # 424 (N/A)

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Bates #	Source	Date	Description
420043	KC PLS	5/1/86	Check # 1319 for \$18,908.62 from James McDougal to Eva Park Riley Interiors (signed by Susan McDougal) (handwritten notes for P.O.M. Ward "find for Fletcher (Jackson) 02/28/86 \$150,000 - verify") (N/A)
280029	KC PLS	5/8/86	Check # 1329 for \$20,000 from James B. McDougal to Larry Kurn (?) (N/A)
380039	KC PLS	5/13/86	Check # 1330 for \$24,897.26 from James McDougal to Union National Bank for loan payment (N/A)
350037	KC PLS	5/30/86	Madison Guaranty Bank Statement dated 05/30/86 for James and Susan McDougal for Checking Account # 424 (N/A)
1380148	KC PLS	3/19/87	Federal Home Loan Bank Board ("FHLBB") Criminal Referral Form with attached proposed 366 filings (N/A)
20232031	WDC PLS	3/7/88	memo from Hawkins to Jeddelloh re: Madison Guaranty Criminal Referral re: Robert Palmer (with handwritten notes) (N/A)
29022910	WDC RTC	3/7/88	memo from Hawkins to Jeddelloh re: Madison Guaranty Criminal Referral re: Robert Palmer (with handwritten notes) (N/A)
19611969	WDC PLS	4/10/89	memo from Hamerly to Underwood; Thomas; Ahrens; Breslaw and Drago re: Madison Guaranty Survey Summary Report (N/A)
23262329	WDC RTC	5/30/89	letter from Breslaw to Carroll re: attached Rose law firm's bill for services rendered from 03/89 to 05/89 (N/A)
23302332	WDC RTC	7/17/89	letter from Hubbell to Breslaw re: attached Rose law firm bill for 05/89 to 06/89 (N/A)
37973798	WDC RTC	10/18/89	memo from Asbacher to Thomas and Roelle (cc: Byrne; Douglas; Rosen; Bartley; Wood and Martinelli) re: Madison D&O Claim Close-out (N/A)
1250137	KC PLS	11/20/89	letter from Banks and Stoll to Trantham (cc: Strayhorn) re: Indictments against McDougal; D. Henley and J. Henley (Indictment attached) (N/A)
196	KC PLS	12/27/89	Failed Bank and Thrift Litigation Reporter article; "Former Madison Chief Officer is Indicted for Bank Fraud" (N/A)

Bates #	Source	Date	Description
37993800	WDC RTC	1/18/90	memo from Asbacher prepared by Sorenson to Underwood and Roelle (cc: Byrne; Douglas; Rosen; Bartley; Wood; Martinelli and Asbacher) re: Madison Bond Claim Close-out (N/A)
1970199	KC PLS	2/16/90	Information and Waiver of Indictment by John Latham (N/A)
2000212	KC PLS	5/14/90	fax from Seliga to Breslaw (with handwritten notes to cc: Beaty and Schultz and advice (by Breslaw?)) re: Contents of anticipated testimony of attorney
2130214	KC PLS	6/8/90	letter from Donovan to Breslaw re: attached 06/0890 article from the Arkansas Democrat: "Jury finds McDougal
32593260	WDC RTC	6/18/90	FBI memo re: opening of investigation of McDougal (N/A)
3408	WDC RTC	8/22/90	unsigned memo from Beaty to Dudine (cc: Thomas) re: Investigation Close-out (N/A)
3834	WDC RTC	8/22/90	memo from Beaty to Dudine (cc: Thomas) re: Investigation Close-outs (N/A)
3801	WDC RTC	9/11/90	memo from Asbacher to Eisenstein (cc: Thomas)
38023803	WDC RTC	9/12/90	memo from Asbacher to Eisenstein (cc: Thomas; Rosen; Dudine; McClellan; Beatty; Bartley; Keys; Martinelli and Asbacher) re: Closeout of Blanket Bond Liability Claims (N/A)
34103420	WDC RTC	10/17/90	memo from Dudine to Beaty (cc: Thomas) re: investigation close-outs (with attached list of close-outs) (N/A)
3409	WDC RTC	11/1/90	memo from Garrett to Regional Sass re: Investigation Close-outs (N/A)
38063807	WDC RTC	11/1/90	memo from Garrett to Regional Sass re: Investigations Close-outs (incomplete attachment) (N/A)
38353846	WDC RTC	11/1/90	memo from Garret to Regional Sass re: attached 10/17/90 memo from Dudine to Beaty (cc: Thomas) re: attached list of Investigations Close-outs (N/A)
38043805	WDC RTC	11/1/90	memo from Garrett to Regional Sass re: Investigations Close-outs (incomplete attachment) (N/A)
34013407	WDC RTC	2/26/91	memo from Breslaw to Jacobs and Roelle (cc: Seidman; Rosen; Thomas; Monahan; Braceley; Jacobs; Roelle; Dudine and Martinelli) re: Request for Authorization to Accept Settlement Offer (N/A)

Bates #	Source	Date	Description
38083815	WDC RTC	3/5/91	memo from Beaty to Thompson (cc: Curtis and Asbacher) re: attached 02/26/91 memo from Breslaw to Jacobs and Roelle (cc: Seidman; Rosen; Thomas; Monahan; Braceley; Jacobs; Beaty; Roelle; Dudine; and Martinelli) re: request for Authorization to Accept Sett
33883389	WDC RTC	4/15/91	handwritten letter from Breslaw to Clifton Ind re: attached check for Frost settlement (N/A)
3816	WDC RTC	4/17/91	letter from Sorenson to Iorio re: Frost settlement (handwritten note by Iorio to cc: Vanvalkenburg) (N/A)
3387	WDC RTC	4/17/91	letter from Sorenson to Iorio (cc: Hyde) re: settlement with Frost & Co. - Matter will be transferred from Minneapolis to Tulsa (with handwritten notes to cc: Vanvalkenburg (N/A)
4589	WDC RTC	8/27/91	memo from Walton to VanValkenburg re: Priority Listing of Institutions having suspected criminal activity and Criminal Investigation start and completion times (N/A)
45944595	WDC RTC	12/11/91	memo from Brennan to Walton re: referral schedule in order of priority (N/A)
45964598	WDC RTC	12/11/91	memo from Walton to VanValkenburg re: Priority Listing of Institutions having suspected criminal activity and Criminal Investigation start and completion times (schedule attached) (N/A)
4948		1/7/92	(01/07/93?) memo from Lewis to Criminal Admin File (cc: Iorio and Ausen) re: conversation with Didson re: FOIA request for Madison records from Martin with Arkansas Time (N/A)
4962		3/9/92	memo from Walton to Foust re: newspaper articles on Clinton and McDougal (N/A)
45874588	WDC RTC	5/27/92	memo from Walton to Vanvalkenburg and Iorio (cc: Denton) re: Tulsa Office Priority Listing of Institutions having suspected criminal activity and Criminal Investigation start and completion times (N/A)
43134317	WDC RTC	8/14/92	Routing and Transmittal Slip from Iorio to "JT" re: attached 08/13/92 memo from Lewis to Iorio (cc: Ausen) re: summary of the current status of Madison investigation (N/A)
26952700	Begin File No. 19	8/28/92	Lists of Flow of Funds - McDougal related entities sorted by payee and payor (N/A)
1760194	KC PLS	8/31/92	RTC Criminal Referral #C0004 re: Madison (Handwritten note to Julie "Per our phone conversation" - Iorio - 09/01/92 (N/A)
4960		9/1/92	letter from Iorio to Banks re: #C0004 transmittal letter (N/A)

Bates #	Source	Date	Description
4961		9/1/92	letter from Iorio to Irons (FBI) re: #C0004 transmittal letter (N/A)
1620175	KC PLS	9/3/92	fax from Yanda to Iorio of Indictment (See 0125 - 0137 above) (NOC)
3396	WDC RTC	9/8/92	letter from Breslaw to Thompson (cc: Yanda and Eisenstein) re: Madison closed files and close-out materials (N/A)
4959		9/10/92	memo from Lewis to Iorio re: referral #C0004 and effect of 3/92 New York Times article (N/A)
49524956		10/1/92	memo from Iorio to Bonewitz (cc: McCann; Foust and Lewis) re: small balance delinquent loan sale review of MDS report dated 08/25/92 (with attached SBDL Loan listing) (N/A)
4951		10/9/92	e-mail from Lewis to Bonewitz re: clarification on files requested (N/A)
4957		12/15/92	letter from Pettus (FBI) to Lewis re: acknowledgement of #C0004 (N/A)
4950		12/18/92	memo from Bonewitz to Thacker (cc: Lynn and Richardson) re: request from investigations re: SBDL Sale (N/A)
4949		1/4/93	e-mail from Lewis to Ryan re: no litigation on Madison or Castle Grands - Lewis can respond to FOIA request (N/A)
2200	WDC PLS	1/28/93	Legi-Slate print out of 01/28/93 article re: D'Amato Will Try to Force Banking Committee Hearing on Whitewater (N/A)
4473	WDC RTC	1/31/93	e-mail from Lewis to Iorio re: attached copy of the initial chronological white paper re: investigations trips to the Little Rock warehouse (NOC)
1872	WDC PLS	3/14/93	(**NOTE - Documents 1872 - 1940 are probably from Breslaw**) [redacted] [redacted] FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury [redacted]
4947		5/3/93	memo from Lewis to Criminal Admin File (cc: Iorio and Ausen) re: conversation with Roddey re: #C0004 being sent directly to WDC and Roddey thought that "we'd probly (sic) never hear about it again" (NOC)
4945		5/4/93	e-mail from Jankowski to Winsett and Cavinaw - forwarded by Iorio to Ausen and Lewis re: call from Arkansas Democrat-Gazette re: Tucker and Madison (NOC)

Bates #	Source	Date	Description
4946		5/4/93	letter from Lewis to Pence re: request for response re: referral #C0004 (NOC)
4944		5/10/93	e-mail from Iorio to Lewis and Jankowski re: meeting re: referral (NOC)
4943		5/10/93	letter from Pence to Lewis re: response to 05/04/93 letter - conflict of interest in prosecuting #C0004 (NOC)
4942		5/11/93	e-mail from Dedmon to Ryan; Ausen and Lewis re: inventory box for Madison (NOC)
4941		5/13/93	e-mail from Lewis to Iorio and Ausen re: Per Pence's suggestion
49394940		5/14/93	letter from Lewis to Houston (cc: Schwartz; Iorio and Ausen) re: request for copies of FDIC exam reports for Madison Bank & Trust (with attached Certification) (NOC)
4935		5/19/93	e-mail from Lewis to Iorio and Ausen re: call with Mitchell re: #C0004 had been forwarded to Henneman - conversation with Henneman - knew referral but thought it had been declined (NOC)
4936		5/19/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4938		5/19/93	memo from Lewis to Criminal Admin File (cc: Iorio and Ausen) re: conversation with Mitchell who has no record of #C0004 and decision to resubmit the referral to Koffsky (NOC)
4937		5/19/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4934		5/20/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman - couldn't talk because of another "crisis" they were dealing with (NOC)
4933		5/21/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: Westbrook believes #C0004 went to Rich (NOC)
4975		5/24/93	Equifax DTEC Report for Sue Strayhorn (N/A)
4977		5/24/93	TRW Social Search Report for Strayhorn (N/A)
4976		5/24/93	Trans Union Trace Report for Strayhorn (N/A)
4932		5/24/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: Rich; "presumed holder" of #C0004 is out of the office (NOC)

Bates #	Source	Date	Description
4971		5/24/93	TRW Social Search Report for Gregory Young (N/A)
4972		5/24/93	Equifax DTEC Report for Felisa McEntire (N/A)
4970		5/24/93	Trans Union Trace Report for Gregory Young (N/A)
4969		5/24/93	Equifax DTEC Report for Gregory Young (N/A)
4973		5/24/93	Trans Union RTrac Report for Felisa McEntire (N/A)
4974		5/24/93	TRW Social Search Report for Felisa McEntire (N/A)
4931		5/26/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: referral had been sent to Ira Raphelson (NOC)
4929		5/27/93	letter from Houston to Lewis re: request for FDIC exam reports for Madison Bank & Trust (NOC)
4930		5/27/93	e-mail from Lewis to Iorio and Ausen re: call from Word re: assisting Henneman locate referral (NOC)
5004	End File No. 31	6/1/93	memo from Cashin to Lewis re: copy of cashiers check (noted by Hovey) (NOC)
4928		6/8/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: Word found #C0004 in the Fraud Section to the Criminal Division and the individual assigned to the referral "didn't want to deal with it" - memo to Frazier re: no basis for Little Rock to rec
4030409	KC PLS	6/17/93	memo from Dudine
4926		6/23/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: return of #C0004 to USA/Little Rock because there was "no basis for the recusal of the U.S. Attorney" (NOC)
49244925		6/23/93	letter from Lewis to Houston (cc: Flechas, Iorio and Ausen) re: UNB FDIC exam reports (attached Certification re: agreement re: confidential information (NOC)
4927		6/23/93	e-mail from Lewis to Iorio and Ausen re: conversation with Henneman re: #C0004 - Henneman will contact Frazier to see what he decided re: referral before he left (NOC)

Bates #	Source	Date	Description
4923		6/29/93	e-mail from Lewis to Iorio and Ausen re: call from source re: return of #C0004 to USA/Little Rock and Pence and Casey's plan (NOC)
4922		7/1/93	letter from Flechas to Lewis re: 06/23/93 letter to Houston re: request for UNB reports and work papers - need to contact the OCC (NOC)
4100420	KC PLS	7/19/93	(start date) memo from Foust through VanValkenburg to Iorio re: Madison Civil review - note at top of page to "please destroy when reviewed' per K.F. 'unprofessional work product' per L.R.I." (Page 0417 has interesting handwritten notes) (120)
5023		7/20/93	e-mail from Yanda to Breslaw re: "JT has directed me to make sure we're ready when and if the criminal referrals generate additional inquiries on the civil side" (5)
5022		7/20/93	e-mail from Breslaw to Eisenstein and Yanda re: Yanda's e-mail and Madison files' location (7)
49	KC PLS	7/21/93	e-mail from Yanda to Orr and Adams re: "asap" request for 09/08/92 Breslaw memo to "JT" re: Madison Guaranty (see 3396 described below) (4)
5021		7/21/93	e-mail from Yanda to Iorio; Vanvalkenburg; Foust and Adams re: Breslaw trying to track down files in permanent storage (6)
4921		7/21/93	memo from Lewis through Parks to Iorio re: request for approval for out of Region Travel re: trip to Memphis to visit Gerrish (NOC)
5018		7/21/93	e-mail from Breslaw to Yanda re: Madison - Breslaw understands that "JT's the one driving this ship" and Breslaw is "way past getting upset about anything in the RTC" - her secretary is "on the file finding mission" (**6**)
5019		7/21/93	e-mail from Yanda to Breslaw re: thanks for understanding (NOC)
5020		7/21/93	e-mail from Yanda to Orr (cc: Adams) re: "asap" request for 09/08/92 memo from Breslaw to JT re: Madison (see 3396 described above) (4)
49194920		7/29/93	fax from Lewis to Gerrish re: attached 07/29/93 letter from Lewis to Gerrish re: trip to Memphis with Caron to review Madison documents (NOC)

Bates #	Source	Date	Description
4600463	KC PLS	8/4/93	fax from Breslaw to Yanda re: attached documents: (1) 08/03/93 memo from Stone to Yanda (cc: Breslaw) re: Madison Guaranty documents; (2) 08/03/93 memo from Vaden (FDIC) to Breslaw (cc: Stone) re: Madison Guaranty files and attached list (Undated memo fro
4918		8/4/93	letter from Lewis to Scoll (cc: Iorio and Ausen) re: request for copies of the OCC exam reports for Union National Bank (NOC)
26092618	WDC RTC	8/13/93	Directive to all Washington and Field Offices from Geer re: "The Privacy Act of 1974: Rights and Responsibilities" (NOC)
4917		8/16/93	e-mail from Lewis-Richardson to Owens; Chakhtoura; Corbet and Horning re: request to pull box 0036 - Dixie Continental Leasing (NOC)
4913		8/24/93	letter from Koss to Lewis re: attached copies of UNB Exam reports (copy not attached) (NOC)
4914		8/24/93	letter from Serino to Lewis re: Koss will sen UNB Exam reports (NOC)
239	KC PLS	9/1/93	subpoena from Jackson to Cavinaw (9)
2280231	KC PLS	9/9/93	memo from Anderson to Richardson (cc: Barbieri
50	KC PLS	9/14/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
50006	KC PLS	9/15/93	Subpoena for the Eastern District of Arkansas for documents (from Fletcher Jackson) to Dennis Cavinaw (VP - RTC; KCO) (14)
53	KC PLS	9/15/93	
51	KC PLS	9/15/93	
52	KC PLS	9/15/93	e-mail from Carmichael to Brock (see 0051) forwarded to Philip Adams (11)

Bates #	Source	Date	Description
54	KC PLS	9/16/93	e-mail from Carmichael to Adams re: "Roles and Responsibilities" between Legal and Investigations Criminal Coordinators - "They [Investigations] think they have maneuvered around me." (15)
396	KC PLS	9/16/93	Handwritten notes re: 09/16/93 telephone call with Jackson re: documents - "9/21 is 'not magic'" (NOC)
2320234	KC PLS	9/20/93	<div style="border: 1px solid black; padding: 10px; width: fit-content; margin: auto;"> FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury </div>
55	KC PLS	9/20/93	
56	KC PLS	9/22/93	
252	KC PLS	9/22/93	
58	KC PLS	9/23/93	
57	KC PLS	9/23/93	
32793283	WDC RTC	9/23/93	Indictment in U.S.A. v. Hale Matthews and Fitzhugh (N/A)
4916		9/23/93	e-mail from Lewis to Iorio and Ausen re: conversation with Henneman re: upcoming referrals and #C0004 - she "assured me that; if necessary; the 'higher-ups' at Justice would make sure something got done with these referrals; including the first one; which
4915		9/23/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
32713272	WDC RTC	9/23/93	e-mail from Lewis to Iorio and Ausen re: Conversation with Henneman re: new referrals - forwarded by Iorio to Cavinaw
4312	WDC RTC	9/24/93	e-mail from Iorio to Cavinaw; Thompson and Dudine (bcc: Ausen) re: delivery of "documents" re: Madison (referrals?) to Cavinaw; Thompson and Dudine - civil review materials will be available later (NOC)

Bates #	Source	Date	Description
4912		9/24/93	✓ e-mail from Iorio to Cavinaw; Thompson and Dudine (bcc: Ausen) re: delivery of "documents" re: Madison (referrals?) to Cavinaw
4911		9/24/93	memo from Ausen to Dudine re: enclosed documents (referrals?) Iorio referred to in his 09/24/93 e-mail (copy not attached) (NOC)
59	KC PLS	9/28/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
4910		9/29/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: request for copies of the criminal referrals (NOC)
4909		9/29/93	confirmation of Ausen' receipt of Lewis' e-mail (N/A)
4908		9/29/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4906		9/29/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4905		9/29/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4902		9/29/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4904		9/29/93	✓ e-mail from Lewis to Iorio and Ausen re: call from Kyle with the Associated Press (NOC)
32743275	WDC RTC	9/29/93	✓ e-mail from Lewis to Iorio and Ausen - forwarded by Iorio to Cavinaw; Thompson and Dudine - forwarded by Dudine to Gamble re: call from Henneman re: plan for new referrals (NOC)
4903		9/29/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4907		9/29/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: conversation with Westbrook re: will get copies of whole referral directly from the USA - would like only copies of the transmittal letters and summaries from Lewis (NOC)
60	KC PLS	9/29/93	e-mail from Breslaw to McClain
4311	WDC RTC	9/30/93	e-mail from Yanda to Iorio re: call with Glion re: legal review of referrals (Iorio's copy of the e-mail - see also 0062) (21)

Bates #	Source	Date	Description
4899		9/30/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4900		9/30/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4901		9/30/93	✓ e-mail from Lewis to Iorio and Ausen re: call from Schmidt (22)
42324240	WDC RTC	9/30/93	update of 05/29/92 memo from Ryan through Robison to Iorio (cc: Ausen; Denton; Ramakrishnan; Lee; Yanda and Curtis re: Plan of Investigation for Madison (42)
62	KC PLS	9/30/93	e-mail from Yanda to Iorio (bcc: Carmichael) re: Plan for legal to review the referrals (21)
61	KC PLS	9/30/93	✓ e-mail from Lewis to Iorio and Ausen - Forwarded by Iorio to Cavinaw; Thompson and Dudine - Forwarded by Cavinaw to Curtis re: Phone call from Schmidt with the Washington Post - comment by Schmidt that people in the "legal and investigative community of R
4898		10/1/93	e-mail from Lewis to Strahl re: need 6 - 8 boxes to box and store Madison records in the basement (NOC)
64	KC PLS	10/1/93	e-mail from Breslaw to Yanda - forwarded by Yanda to Adams and Carmichael re: Madison Documents will arrive by next Tuesday (October 5th) - Reminder to Investigations that all calls from the press on Madison are to be referred to Katsanos in DC (24/NOC)
63	KC PLS	10/1/93	e-mail from Yanda to Carmichael and Adams re: confirmation (with Dudine's blessing) of two week period to review referrals (23)
65	KC PLS	10/4/93	e-mail from Brock to Adams re: Carmichael can not attend meeting on Wednesday and Stull (Stoll?) from USA returned call - Thursday would be fine for a meeting (25)
67	KC PLS	10/5/93	e-mail from Yanda to Iorio et al (See 0066 above) - Forwarded e-mail from Foust to Yanda - forwarded by Yanda to Adams and Carmichael re: arrival at PLS tomorrow morning (26)
68	KC PLS	10/5/93	e-mail from Lewis to Carmichael; Day and Ausen re: Conversation with AUSA Harris in Little Rock re: Collier sentencing date (27)
4310	WDC RTC	10/5/93	e-mail from Donohue to Dudine; Baker; Gamble; Ambrose and Iorio re: call from Dick (FBI/HQ) re: status of referrals (NOC)

Bates #	Source	Date	Description
66	KC PLS	10/5/93	e-mail from Yanda to Iorio; Vanvalkenburg; Foust; Adams and Carmichael re: Arrival of DC Madison files (26)
690070	KC PLS	10/6/93	e-mail from Lewis to Iorio; Ausen; Jankowski - forwarded to Cavinaw; Thompson; Dudine; and Yanda by Iorio re: planning to send referrals on Friday October 8th - FYI - Lewis e-mail re: Visit at her home by Schmidt and Schmidt's informative comments (28)
48964897		10/6/93	e-mail from Lewis to Iorio; Ausen; and Jankowski re: Visit from Schmidt at Lewis' home (28)
4894		10/6/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4895		10/6/93	confirmation of Jankowski's receipt of Lewis' e-mail (N/A)
17121724	WDC PLS	10/7/93	memo from Carmichael and Adams to Yanda re: legal review of Madison Criminal Referrals (33)
73	KC PLS	10/7/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
3970399	KC PLS	10/7/93	Handwritten notes re: files needed and 10/07/93 telephone call with Jackson and Carmichael re: documents (NDOC)
75	KC PLS	10/7/93	e-mail from Foust to Yanda and Iorio - forwarded by Yanda to Breslaw
76	KC PLS	10/7/93	e-mail from Foust to Yanda and Iorio - forwarded by Yanda to Adams and Carmichael re: More information (? - same e-mail as 0075 above) re: Request for Bassett depo and Ward litigation documents (29)
2580271	KC PLS	10/7/93	letter from Carmichael and Adams to Yanda re: Legal review of KCO's Investigations Criminal Referrals (33)
43184330	WDC RTC	10/7/93	memo from Carmichael and Adams to Yanda re: Legal Review of Criminal Referrals (33)
77	KC PLS	10/7/93	e-mail from Yanda to Adams and Carmichael re: Foust request for documents (31)
4892		10/7/93	e-mail from Foust to Yanda and Iorio - forwarded by Foust to Lewis re: request for deposition of Bassett and Ward litigation documents (NOC)
4890		10/7/93	confirmation of Foust's receipt of Lewis' e-mail (See 4893) (N/A)

Bates #	Source	Date	Description
4889		10/7/93	confirmation of Ausen's receipt of Lewis' e-mail (See 4893) (N/A)
49915003		10/7/93	memo from Adams and Carmichael to Yanda re: Legal Review of Referrals (33)
19811993	WDC PLS	10/7/93	memo from Carmichael and Adams to Yanda re: Legal Review of Madison Criminal Referrals (33)
27552767	WDC RTC	10/7/93	memo from Carmichael and Adams to Yanda re: Legal Review of Criminal Referrals (33)
71	KC PLS	10/7/93	e-mail from Brock to Adams and Carmichael re: Call by Julie (Yanda) - Iorio is requesting a status report on the referrals - would like to meet with them when she gets in (30)
72	KC PLS	10/7/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
4893		10/7/93	e-mail from Lewis to Iorio; Ausen and Foust re: call to Gerrish re: Ward lawsuit - Mitchell represented Ward - suggestion that Lewis call Strayhorn - Schmidt called Gerrish (NOC)
4888		10/7/93	e-mail from Foust to Iorio; Lewis and Ausen re: search and review of Madison close-out memos (NOC)
32403252	WDC RTC	10/7/93	memo from Carmichael and Adams to Yanda re: Legal Review of Madison Criminal Referrals (33)
4891		10/7/93	confirmation of Iorio's receipt of Lewis' e-mail (See 4893) (N/A)
4890502	KC PLS	10/8/93	e-mail from Yanda to Dudine; Hindes; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: attached report on the 9 criminal referrals (See also 0079 and 0403 - 0409 above (33)
4887		10/8/93	e-mail from Yanda to Dudine; Hindes; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: "pursuant to RTC internal policy memorandum dated June 17; 1993" attached in the legal review of the criminal referrals (
78	KC PLS	10/8/93	e-mail from Breslaw to Foust
8170884	KC PLS	10/8/93	Madison Guaranty Savings & Loan Criminal Referral 730CR0190 with exhibits (N/A)
80	KC PLS	10/8/93	e-mail from Gascoigne to Carmichael; Carver and Hodes re: request by "terminations" for an initial review of Madison (NOC)

Bates #	Source	Date	Description
79	KC PLS	10/8/93	e-mail from Yanda to Dudine; Hinds; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: "Pursuant to RTC internal memorandum dated 06/17/93" attached is the report on the 9 criminal referrals (no attachment) (
291	KC PLS	10/12/93	memo from Ausen to Carmichael re: Legal Review of the KCO Criminal Referrals (34)
2720290	KC PLS	10/12/93	letter from Hinton through Ausen to Carmichael re: 10/08/93 cover letters for the Criminal Referrals from Ausen to Irons and Casey (cc: Henneman) (NOC)
81	KC PLS	10/12/93	[REDACTED] FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
89	KC PLS	10/13/93	e-mail from Golden to Carmichael and Gamble re: draft letter to AUSA re: rolling production (45)
85	KC PLS	10/13/93	[REDACTED]
83	KC PLS	10/13/93	e-mail from Carmichael to Yanda and Adams (See 0082 above) - forwarded to Gamble by Yanda with comment: "Carl; I want to make sure you're aware of this." (37)
84	KC PLS	10/13/93	e-mail from Halbleib to Carmichael re: cover letter for Dean Paul (43)
4882	WDC RTC	10/13/93	e-mail from Carmichael to Ausen; Halbleib and Murphy re: letter to Jackson re: attached Dean Paul documents (34/39)
48834885	WDC RTC	10/13/93	[REDACTED]
88	KC PLS	10/13/93	[REDACTED]
4886		10/13/93	letter from Lewis to Henneman (cc: Iorio and Ausen) re: attached copies of transmittal letters for and summaries of the nine criminal referrals submitted 10/08/93 (NOC)
86	KC PLS	10/13/93	[REDACTED]

Bates #	Source	Date	Description
505	KC PLS	10/13/93	e-mail from Golden to Gamble and Carmichael (Same document as 0088 described above) - forwarded by Carmichael to Yanda and Adams ("FYI - Comments from WDC") (34/41)
70009	KC PLS	10/13/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
82	KC PLS	10/13/93	e-mail from Carmichael to Adams and Yanda re: transmittal letters for the Madison referrals with copies to Irons and Henneman (Ethics Program Director - "EPD") EPD "is the subject of the phone call we received from Washington two weeks ago that began our
87	KC PLS	10/13/93	e-mail from Golden to Carmichael and Gamble re: production plans (41)
91	KC PLS	10/14/93	e-mail from Yanda to Carmichael re: "why is he doing this?" (NOC)
90	KC PLS	10/14/93	e-mail from Carmichael to Golden re: letter and document production (46)
92	KC PLS	10/14/93	e-mail from Carmichael to Yanda re: Ausen's response to Adams and Carmichael's report
3	KC PLS	10/14/93	
93	KC PLS	10/15/93	e-mail from Yanda to Carmichael re: Richard [Iorio's] agreement to allow Carmichael two weeks to review referral (48)
4881	WDC RTC	10/18/93	e-mail from Foust to Lewis and Iorio re: Madison files on Ward?; Breslaw said that there is no Bassett deposition (NOC)
4880	WDC RTC	10/20/93	letter from Carmichael to Jackson re: attached documents requested re: 04/08/86 \$300M deposit by the McDougals (51)
15	KC PLS	10/20/93	letter from Carmichael to Jackson re: documents relevant to a \$300M deposit to the McDougal checking account on 04/08/86 (51)
440045	KC PLS	10/20/93	fax from Jackson to Carmichael of 10/20/93 memo re: request for items to "trace out" 04/08/86 \$300.000 deposit to McDougal (50)
2350236	KC PLS	10/20/93	

Bates #	Source	Date	Description
160017	KC PLS	10/21/93	memo from Amparan to Richardson
528	KC PLS	10/22/93	e-mail from Foust to Yanda; Iorio and Lewis re: attempt to obtain Ward documents - forwarded by Yanda to Adams and Foust re: Adams to assist Foust (52)
529	KC PLS	10/22/93	e-mail from Foust to Yanda; Iorio and Lewis - forwarded by Yanda to Adams and Foust - forwarded by Foust to Adams and Iorio re: Assistance in obtaining the Ward documents (52)
5300531	KC PLS	10/22/93	e-mail from Ausen to Iorio
48784879		10/22/93	fax cover sheet from Lewis to Koss re: attached copy of information on Union National Bank of Little Rock and original copy of request (copy of request not attached) (NOC)
4877		10/22/93	fax transmittal confirmation (N/A)
4876		10/22/93	e-mail from Lewis to Ausen re: Call with Koss re: OCC UNB Exam reports (NOC)
4875		10/22/93	e-mail from Ausen to Iorio; Jankowski and Lewis re: call from Schmidt and alleged dispute between investigations and legal (53)
216	KC PLS	10/25/93	handwritten notes re: Jackson; Schlup and Victim Impact Statements of Tyler, Clapp and Collier (N/A)
4874		10/25/93	e-mail from Foust to Iorio and Lewis re: assets of potential Madison targets (NOC)
95	KC PLS	10/26/93	e-mail from Yanda to Hinds; Eisenstein; Kaufman; Iorio; Carmichael; Adams and Jankowski re: phone call from Schmidt re: alleged "dispute between Investigations and Legal that led to a delay in the recent criminal referrals out of Madison Guaranty." (55)
4873		10/26/93	e-mail from Yanda to Hinds; Eisenstein; Kaufman; Iorio; Carmichael; Adams; and Jankowski - forwarded by Iorio to Dudine; Cavinaw and Ausen re: call from Schmidt last night at home (55)
510	KC PLS	10/26/93	e-mail from Jankowski to Cavinaw and Iorio - forwarded by Jankowski to Yanda - forwarded by Yanda to Adams; Carmichael; Foust and Iorio re: Jankowski's call from Schmidt re: Ward litigation (NOC)

Bates #	Source	Date	Description
511	KC PLS	10/26/93	e-mail from Jankowski to Cavinaw and Iorio re: Jankowski's call from Schmidt re: Ward litigation - forwarded by Jankowski to Yanda - forwarded by Yanda to Adams and Carmichael with comments to Adams re: Response from Ken (Foust?) re: Ward files (56)
515	KC PLS	10/26/93	e-mail from Marcusen to Yanda re: file retrieval - just call Marjorie - forwarded by Yanda to Adams re: "get on this asap" (58)
512	KC PLS	10/26/93	Same document as 0096 - 10/26/93 e- mail from Jankowski to Cavinaw and Iorio - forwarded to Yanda by Jankowski - forwarded to Marcusen
513	KC PLS	10/26/93	e-mail from Marcusen to Adams and Yanda re: Ward documents at off-site storage (handwritten phone number for Foust) (NOC)
514	KC PLS	10/26/93	e-mail from Marcusen to Adams and Yanda - forwarded by Yanda to Marcusen and Adams re: "does it take an act of congress to get files back from off site storage?" (58)
97	KC PLS	10/26/93	e-mail from Yanda to Adams and Carmichael re: "need to discuss what you find in the files before we deal with Ken's request." (59/NOC)
96	KC PLS	10/26/93	e-mail from Jankowski to Cavinaw and Iorio - forwarded to Yanda by Jankowski - forwarded to Marcusen; Kaufman; Adams and Carmichael by Yanda re: (1) Jankowski's call from Schmidt re: Ward litigation; and (2) Assistance in finding Ward files (NOC)
4867		10/26/93	e-mail from Lewis to Iorio and Ausen re: Conversation with Nichols (FDIC) re: UNB exam reports (NOC)
4868		10/26/93	fax cover sheet from Lewis to Nichols re: attached copy of 06/23/93 letter To Houston with attached certification to keep confidential (no attachment) (NOC)
4870		10/26/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4871		10/26/93	e-mail from Lewis to Iorio and Ausen re: conversation with Nichols re: UNB exam reports (NOC)
4872		10/26/93	e-mail from Jankowski to Cavinaw and Iorio (bcc: Lewis) re: call from Sue Schmidt (NOC)
4866		10/26/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)

Bates #	Source	Date	Description
4864		10/27/93	e-mail from Lewis to Iorio and Ausen re: call from Jackson - Lewis asked Jackson to direct future calls to her through the FBI (NOC)
4869		10/27/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4862		10/27/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4865		10/27/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4863		10/27/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4861		10/27/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: Casey will be declining to prosecute #C0004 (NOC)
4860		10/27/93	letter from Casey to Lewis (cc: Westbrook) re: declination to prosecute Criminal Referral #C0004 (NOC)
4859		10/27/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4858		10/27/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4856		10/29/93	e-mail from Lewis to Iorio and Ausen re: call from Koss re: search for OCC UNB Exam reports (NOC)
4857		10/29/93	<div style="border: 1px solid black; padding: 5px; display: inline-block;">FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury</div>
2370238	KC PLS	10/29/93	
4851		10/29/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4855		10/29/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4854		10/29/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4853		10/29/93	

Bates #	Source	Date	Description
4852		10/29/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4850		10/29/93	confirmation of Carmichael's receipt of Lewis' e-mail (N/A)
2530255	KC PLS	11/1/93	letter from Iorio to Dudine (cc: Cavinaw; Yanda; Ausen; Carmichael and Lewis) re: attached documents: (1) 10/27/93 letter from Casey to Lewis (cc: Westbrook) re: declination to act of referral (#C0004?); and (2) 11/01/93 letter from Lewis to Casey (cc: We
4306	WDC RTC	11/1/93	e-mail from Mathews to all investigations re: response to questions from media to be "no comment" and should be referred to Jankowski (NOC)
99	KC PLS	11/2/93	e-mail from Breslaw to Yanda and Eisenstein - forwarded by Yanda to Adams and Carmichael re: phone call from Schmidt - has talked to Smith (FDIC) - Knew that Breslaw was not working on criminal matters "(from interviews with investigators
98	KC PLS	11/2/93	e-mail from Carmichael to Corbet re: coordination of rolling document production; docs to be stored in PLS section; "Justice from WDC is calling about the production." (60)
520	KC PLS	11/2/93	e-mail from Carmichael to Adams re: "something from your friend Jean Lewis that I just know will please you" (NOC)
517	KC PLS	11/2/93	e-mail from Lowe to Park re: Madison Guaranty files - with list of files Carmichael took for doc production search (NOC)
100	KC PLS	11/2/93	e-mail from Lewis to Iorio; Ausen and Jankowski - forwarded by Iorio to Dudine; Cavinaw; Thompson and Yanda re: phone call from Kyle (AP) (62)
256	KC PLS	11/2/93	fax cover page from Golden to Carmichael (no attachment?) (NOC)
4843		11/2/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4844		11/2/93	confirmation of Jankowski's receipt of Lewis' e-mail (N/A)
4845		11/2/93	e-mail from Lewis to Ausen; Jankowski and Iorio re: call from Kyle of the AP (62)
103	KC PLS	11/3/93	e-mail from Foust to Adams and Iorio - forwarded by Adams to Carmichael re: request to ship docs to Dallas (64)

Bates #	Source	Date	Description
101	KC PLS	11/3/93	e-mail from Adams to Foust and Carmichael re: Requested documents are available for review (63)
524	KC PLS	11/3/93	e-mail from Foust to Adams
4837	WDC RTC	11/3/93	e-mail from Lewis to Iorio and Ausen re: Call from Koss re: found the missing OCC exams for Union National Bank (NOC)
4842		11/3/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4841		11/3/93	e-mail from Lewis to Ausen; Jankowski and Iorio re: call from Matt from CNN (NOC)
4840		11/3/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4839		11/3/93	confirmation of Jankowski's receipt of Lewis' e-mail (N/A)
102	KC PLS	11/3/93	e-mail from Adams to Foust; Iorio and Carmichael re: Amount of docs - docs must stay in KCO (response to 0103 below) (64/NIB)
4838		11/3/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4836	WDC RTC	11/3/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)
4835	WDC RTC	11/3/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4834	WDC RTC	11/3/93	letter from Koss to Lewis re: enclosed requested OCC exams (NOC)
525	KC PLS	11/4/93	e-mail from Adams to Foust and Carmichael re: 8th is fine (NOC)
4832	WDC RTC	11/4/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
4833	WDC RTC	11/4/93	e-mail from Lewis to Iorio and Ausen re: receipt of the UNB exams (NOC)
675	KC PLS	11/5/93	Inventory for #7236 Madison Guaranty S&L Cashier checks - Acct. #7001312 dated 11/05/93 (with handwritten notes including - "Jean's Office") (NOC)
4831	WDC RTC	11/5/93	confirmation of Ausen's receipt of Lewis' e-mail (N/A)

Bates #	Source	Date	Description
1040105	KC PLS	11/5/93	e-mail from Carmichael to Gamble; Yanda; Hickert; and Adams re: attached chronology of Madison document production (no attachment) response to DOJ's accusations of being uncooperative and non-responsive (66)
113	KC PLS	11/6/93	e-mail from Gamble to Hinds; Dudine; Donohue; Carmichael; and Yanda re: conversations with Carmichael re: document production (68)
112	KC PLS	11/6/93	e-mail from Gamble to Carmichael re: will send [chronology] to Dudine; Hinds and Donohue (67)
4305	WDC RTC	11/6/93	e-mail from Gamble to Hinds; Dudine; Donohue; Carmichael; and Yanda - forwarded by Yanda to Iorio re: conversations with Carmichael re: document production - Comment by Yanda that we need to talk - "our offices are made out to look bad and I think it is
5430544	KC PLS	11/8/93	e-mail from Carmichael to Yanda re: her removal from Madison case - forwarded from Carmichael to Adams for review before sending to Yanda (71)
32673268	WDC RTC	11/8/93	e-mail from Ausen to Iorio - forwarded by Iorio to Yanda; Hinds; Dudine; Gamble and Donohue re: attached plan of action for coordination of document production (69)
3264	WDC RTC	11/8/93	e-mail from Yanda to Gamble and Hinds re: suggestions to deal with "miscommunications" problem which "just doesn't seem to be getting any better" (**NOC**)
114	KC PLS	11/8/93	e-mail from Hickert to Carmichael; Yanda and Adams re: chronology (NOC)
1150116	KC PLS	11/8/93	e-mail from Ausen to Iorio - forwarded by Iorio to Yanda; Hinds; Dudine; Gamble and Donohue - forwarded by Yanda to Carmichael and Adams re: attached document describing background information and plan of action re: document production (69)
1170118	KC PLS	11/8/93	e-mail from Ausen to Iorio - forwarded by Iorio to Yanda; Hinds; Dudine; Gamble and Donohue - forwarded by Yanda to Hinds; Gamble; Carmichael and Adams re: Ausen's e-mail and the "far murkier water underlying the gloss (spin) in Lee's e-mail." (Also see
4279	WDC RTC	11/8/93	e-mail from Ausen to Iorio re: response to this morning's e-mail re: lack of communication and actions investigations will take (69)
4827	WDC RTC	11/9/93	confirmation of Lewis-Richardson's receipt of Lewis' e-mail (N/A)

Bates #	Source	Date	Description
6700673	KC PLS	11/9/93	fax from Carmichael to Gamble re: attached 11/08/93 letter from Carmichael to Johnson; Jackson; Irons and Reign (cc: Adams)
4826	WDC RTC	11/9/93	confirmation of Iorio's receipt of Lewis' e-mail (N/A)
545	KC PLS	11/9/93	e-mail from Yanda to Adams and Carmichael re: chronology of the progress of the referrals - "Please make this a top priority" (72)
546	KC PLS	11/9/93	letter from Ausen to Irons (cc: Jackson; Iorio; Yanda; Adams; Lewis and Caron) re: RTC criminal investigation responsibility for Madison is now assigned to Caron (Adams' copy of letter) (73)
4825	WDC RTC	11/9/93	Confirmation of Corbet's receipt of Lewis' e-mail (N/A)
4828	WDC RTC	11/9/93	confirmation of Blakley's receipt of Lewis' e-mail (N/A)
4829	WDC RTC	11/9/93	confirmation of Ausen' receipt of Lewis' e-mail (N/A)
4824	WDC RTC	11/9/93	Confirmation of Cashin's receipt of Lewis' e-mail (N/A)
4830	WDC RTC	11/9/93	e-mail from Lewis to Blakley
45204522	WDC RTC	11/10/93	fax from Lewis to Jankowski (cc: Hinton) re: attached memo to file re: review of Seth Ward litigation files on 11/15 with Caron (??) (NOC)
4519	WDC RTC	11/10/93	e-mail from Jankowski to Cavinaw and Iorio (bcc: Ausen) re: phone call from Taylor of the Kansas City Star and NBC News (75)
4518	WDC RTC	11/10/93	e-mail from Caron to Blakley and Corbet re: response to FOIA request # 93-0776 (NOC)
4515	WDC RTC	11/10/93	e-mail from Lewis to Jankowski; Iorio; Ausen and Caron re: Caron will replace Lewis as the lead investigator on Madison ("The Powers That Be have decided that I'm better off out of the line of fire") (NOC)
548	KC PLS	11/10/93	e-mail from Jankowski to Iorio and Cavinaw - forwarded by Iorio to Dudine; Yanda; Thompson and Ausen re: phone call from Taylor of the Kansas City Star and NBC News (75)
5329		11/10/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury

Bates #	Source	Date	Description
4278	WDC RTC	11/10/93	e-mail from Brunner to Cashin and Lewis - forwarded by Lewis to Caron re: Film Carmichael promised the USA is copied (NOC)
547	KC PLS	11/10/93	e-mail from Sweeter to Iorio - forwarded by Iorio to Cavinaw; Thompson; Dudine; Yanda and Ausen re: phone call from ABC News for Iorio (74)
4517	WDC RTC	11/10/93	e-mail from Brunner to Cashin and Lewis re: Film (NOC)
4513	WDC RTC	11/12/93	letter from Ausen to Carlson (OTS) re: copies of the Madison criminal referrals (NOC)
4512	WDC RTC	11/12/93	e-mail from Mathews to Ausen; Cavinaw; Thompson; Yanda; Dudine and Hinton re: call from Frank of ABC News for Iorio (77)
4509	WDC RTC	11/15/93	Confirmation of Iorio's receipt of Lewis' e-mail (See ??) (N/A)
4510	WDC RTC	11/15/93	Confirmation of Ausen's receipt of Lewis' e-mail (See ??) (N/A)
4511	WDC RTC	11/15/93	Confirmation of Caron's receipt of Lewis' e-mail (See ??) (N/A)
4514	WDC RTC	11/15/93	memo from Caron to file (cc: Ausen)
4551	WDC RTC	11/15/93	e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton (bcc: Lewis) re: 11/11/93 Washington Post article reporting on review of referral refuted by attached document(no attachment) (NOC)
5012		11/15/93	e-mail from Donohue to Iorio; Dudine; Bake and Gamble re: scheduled 11/22/93 meeting (NOC)
119	KC PLS	11/15/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
4537	WDC RTC	11/15/93	
4274	WDC RTC	11/15/93	e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton (bcc: Caron) re: 11/11/93 Washington Post article reporting on review of referral refuted by attached document (no attachment) (NOC)
42754277	WDC RTC	11/15/93	e-mail from Lewis to Iorio; Ausen and Caron re: attached white paper re: chronology of events re: referral #C0004 and subsequent referrals (NOC)
4530	WDC RTC	11/15/93	e-mail from Adams to Caron and Ausen re: Conversation with Jackson re: Dean Paul files (82)

Bates #	Source	Date	Description
4536	WDC RTC	11/15/93	e-mail from Adams to Caron and Ausen re: Foust's review of Ward files in PLS' custody (80)
4535	WDC RTC	11/15/93	[REDACTED]
4534	WDC RTC	11/15/93	[REDACTED] FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury [REDACTED]
4533	WDC RTC	11/15/93	e-mail from Donohue to Iorio; Dudine; Baker and Gamble - forwarded by Iorio to Cavinaw
4532	WDC RTC	11/15/93	[REDACTED]
4531	WDC RTC	11/15/93	e-mail from Lewis to Ausen re: upcoming meeting with McKay on 11/22/93 re: validity of referrals (NOC)
5317		11/16/93	[REDACTED]
4529	WDC RTC	11/16/93	e-mail from Lewis to Caron and Ausen re: follow-up to Adams' e-mail and clarification re: Lewis' conversation with Jackson (NOC)
5315		11/16/93	e-mail from Adams to Caron and Ausen re: request to review documents on Friday and make two copies of documents (87)
552	KC PLS	11/16/93	e-mail from Yanda to Ausen
551	KC PLS	11/16/93	e-mail from Ausen to Yanda and Adams re: 11/22/93 meeting at 1:00 p.m. with McKay and others (91)
550	KC PLS	11/16/93	e-mail from Yanda to Ausen
5318		11/16/93	[REDACTED]
4170	WDC RTC	11/16/93	e-mail from Caron to Blakley and Ausen re: response to FOIA requests # 93-0776 and 93-0810 (NOC)
4528	WDC RTC	11/16/93	Confirmation of Caron's receipt of Lewis' e-mail (See 4529) (N/A)

Bates #	Source	Date	Description
4525	WDC RTC	11/16/93	e-mail from Adams to Caron and Ausen re: message left for Jackson re: document and film production (84)
4524	WDC RTC	11/16/93	e-mail from Caron to Adams and Ausen re: search for files (85)
5314		11/16/93	e-mail from Caron to Adams and Ausen re: estimation of when copies will be ready (88)
4523	WDC RTC	11/16/93	e-mail from Caron to Adams and Ausen re: location of original files for Castle Sewer and Water; Tucker and Fulbright (86)
4527	WDC RTC	11/16/93	e-mail from Lewis to Caron re: spoke with Jackson re: search for REO and loan files (NOC)
5316		11/16/93	e-mail from Caron to Adams and Ausen re: location of Castle Sewer and Water
4493	WDC RTC	11/17/93	memo to file by Lewis re: Donohue and desire to remove PLS from the Investigation (NOC)
45074508	WDC RTC	11/17/93	memo from Caron to File (cc: Ausen) (#730CR0199) re: Stafford assumption of Chris Wade loan (NOC)
556	KC PLS	11/18/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
555	KC PLS	11/18/93	e-mail from Foust to Carmichael; Iorio and Yanda - forwarded by Yanda to Adams re: copies of Madison documents (95)
554	KC PLS	11/18/93	e-mail from Foust to Carmichael; Iorio; and Yanda - forwarded by Carmichael to Adams re: copies of Madison documents (95)
5313		11/18/93	memo from Caron to File re: Conversation with Reign re: fiche and film and documents (NOC)
1876	WDC PLS	11/18/93	e-mail from Adams to Breslaw and Yanda re: copy of the indictment re: McDougal and the recent referrals (98)
553	KC PLS	11/18/93	e-mail from Breslaw to Carmichael and Yanda - forwarded by Yanda to Breslaw; Carmichael and Adams re: Rose law firm controversy with note that Adams is taking over for Carmichael (94)
121	KC PLS	11/18/93	e-mail from Foust to Carmichael; Iorio and Yanda re: documents (95)

Bates #	Source	Date	Description
557	KC PLS	11/18/93	e-mail from Yanda to Breslaw and Adams re: Jack does not have referrals (97)
4169	WDC RTC	11/18/93	e-mail from Caron to Blakley and Ausen re: response to FOIA # 93-0810 (NOC)
120	KC PLS	11/18/93	e-mail from Breslaw to Carmichael and Yanda re: DC newspapers reporting on controversy re: Rose law firm and Schultz (FDIC) requesting files (94)
4492	WDC RTC	11/18/93	memo from Caron to file re: conversation with Reign re: documents (NOC)
562	KC PLS	11/19/93	e-mail from Adams to Breslaw re: sending copies of nine 1993 and one 1992 referrals (98)
17251859	WDC PLS	11/19/93	memo from Adams to Breslaw re: attached Criminal referrals (attached is a copy of: (1) "Madison Guaranty Referral Summaries" (1726 - 1730); (2) Summaries of three "other" criminal referrals relating to Madison (1731 - 1732); and (3) copies of Madison Crim
558	KC PLS	11/19/93	memo from Adams to Breslaw re: attached copies of the original criminal referral (C#0004) and the nine new referrals (98)
566	KC PLS	11/19/93	e-mail from Ausen to Yanda and Adams re: 11/22/93 meeting with DOJ scheduled for 11:00 a.m. (103)
559	KC PLS	11/19/93	e-mail from Caron to Adams re: confirmation of time for document review (99)
561	KC PLS	11/19/93	e-mail from Breslaw to Adams re: "Thanks" (See 0562 below) (98)
563	KC PLS	11/19/93	e-mail from Adams to Foust (bcc: Yanda) re: All documents copied or just those he (Foust) reviewed? (100)
3307	WDC RTC	11/19/93	memo from Adams to Breslaw re: attached copies of the Madison criminal referrals (no attachment) (98)
564	KC PLS	11/19/93	e-mail from Foust to Adams re: All documents (response to 0563 above) (101)
1980	WDC PLS	11/19/93	memo from Breslaw to Downing (cc: Hindes) re: Possible conflict of interest of Rose law firm (NOC)
565	KC PLS	11/19/93	e-mail from Yanda to Adams re: copy all documents for Foust - "it ain't worth fighting over" (102)
560	KC PLS	11/19/93	e-mail from Adams to Caron re: response to Caron's e-mail (See 0559 above) (99)

Bates #	Source	Date	Description
43524381	WDC RTC	11/22/93	memo from Ausen to Winsett re: Summaries of Madison Referrals - Points out Altman was interested in the Campobello referral (#730CR0199) (summaries attached) (NOC)
4488	WDC RTC	11/22/93	Confirmation of Ausen's receipt of Lewis' e-mail (See 4490) (N/A)
5312		11/22/93	memo from Caron to Madison Guaranty File re: Meeting with Reign; Hall; McKay and Ausen re: investigation of Madison (NOC)
4490	WDC RTC	11/22/93	e-mail from Lewis to Ausen; Iorio and Caron re: Call from Nichols (FDIC) re: delay in receiving copies of exam reports (NOC)
18871889	WDC PLS	11/22/93	memo from Kauper to Middlebrook re: attached FOIA 93-0919 request from Taylor of the KC Star (NOC)
567	KC PLS	11/22/93	e-mail from Yanda to Hindes
4489	WDC RTC	11/22/93	Confirmation of Iorio's receipt of Lewis' e-mail (See 4490) (N/A)
5311		11/23/93	e-mail from Caron to Donohue and Ausen re: attached letter to Reign (NOC)
53095310		11/23/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
5308		11/23/93	memo from Caron to Madison Guaranty File re: FBI SA Reign and FA Hall to visit next week and list of documents Reign and Hall would like to review (NOC)
5011		11/23/93	
32693270	WDC RTC	11/23/93	e-mail from Yanda to Iorio; Ausen; Donohue; Hindes; Eisenstein; Kaufman; Adams; Swiss - forwarded by Yanda to Hindes; Eisenstein and Adams - forwarded by Eisenstein to Gamble and Hindes re: Kaufman approved the following procedure to streamline responses
42724273	WDC RTC	11/23/93	e-mail from Yanda to Iorio; Ausen; Donohue; Hindes; Eisenstein; Kaufman; Adams; Swiss - forwarded by Ausen to ? re: Kaufman approved the following procedure to streamline responses to Madison subpoenas (105)

Bates #	Source	Date	Description
568	KC PLS	11/24/93	e-mail from Denavs to Yanda and Wilcox - forwarded by Yanda to Adams and Kaufman re: form files (no attachments) (107)
5116	End File No. 35	11/29/93	memo from Dudine to Schulz re: attached criminal referrals (with 12/16/93 handwritten note from Downing to Dudine re: thanks) (NOC)
1882	WDC PLS	11/29/93	e-mail from Hindes to Breslaw re: hold on to referral if they were not requested by the FDIC (See also 1873) (NOC)
570	KC PLS	11/29/93	e-mail from Yanda to Hindes
1873	WDC PLS	11/29/93	e-mail from Eisenstein to Breslaw and "tlh" (Hindes) re: FDIC knowledge of the referrals (NOC)
569	KC PLS	11/29/93	e-mail from Breslaw to Hindes
4168	WDC RTC	12/1/93	e-mail from Caron to Blakley; Ausen and Corbet re: response to FOIA requests (NOC)
1884	WDC PLS	12/2/93	e-mail from Eisenstein to [Breslaw] and Yanda re: Questions from OTS: OTS exams ever (1) introduced as evidence in a trial or (2) produced to the DOJ? (111)
35523553	WDC RTC	12/2/93	handwritten notes re: meeting with FDIC (Spitler and Downing) re: document production issues (N/A)
576	KC PLS	12/2/93	e-mail from Eisenstein to Breslaw and Yanda - forwarded by Yanda to Eisenstein and Adams re: Question from OTS re: production of exams to DOJ (See 0573 above) (111)
577	KC PLS	12/3/93	e-mail from Adams to Yanda and Eisenstein re: Does not know if OTS exams were produced to DOJ - Asked "Marcinson" (Marcusen?) (112)
581	KC PLS	12/3/93	e-mail from Ausen to Adams
579	KC PLS	12/3/93	e-mail from Adams to Yanda re: called Ausen (114)
4167	WDC RTC	12/3/93	e-mail from Caron to Blakley re: response to FOIA request # 93-0919 (NOC)
578	KC PLS	12/3/93	e-mail from Yanda to Adams - "call Ausen and find out what he knows" (113)
580	KC PLS	12/3/93	e-mail from Adams to Yanda and Eisenstein re: "Marcusen" and Seliga do not believe OTS exam exams were "knowingly" produced - Ausen reviewing referrals (see 0573 above) (115)

Bates #	Source	Date	Description
4166	WDC RTC	12/3/93	e-mail from Caron to Blakley; Ausen and Corbet re: response to FOIA request # 93-0582 (NOC)
4165	WDC RTC	12/3/93	e-mail from Caron to Blakley; Ausen; Iorio and Corbet re: response to FOIA request # 93-0969 (NOC)
4164	WDC RTC	12/3/93	e-mail from Caron to Blakley; Ausen
573	KC PLS	12/3/93	e-mail from Ausen to Adams
582	KC PLS	12/6/93	e-mail from Breslaw to Eisenstein and Yanda re: Madison exams produced in the Frost malpractice case under protective order but Breslaw does not believe exams were provided to DOJ (118)
571	KC PLS	12/6/93	e-mail to all RTC employees re: AETNA enrollment? (N/A)
1886	WDC PLS	12/6/93	e-mail from Breslaw to Kauper and Middlebrook re: FOIA request from KC Star re: Madison (NOC)
572	KC PLS	12/6/93	e-mail to all RTC employees re: AETNA clarification? (N/A)
26742694	End File No. 18	12/7/93	memo from Lindenmuth to Williams re: attached copies of eight FOIA requests for information re: Madison and DOJ review (NOC)
35203541	WDC RTC	12/7/93	memo from Lindenmuth to Williams re: Madison FOIA requests (with attached FOIA requests) (with handwritten notes) (NOC)
36993722	WDC RTC	12/7/93	memo from Lindenmuth to Williams re: attached copies of eight FOIA requests for information re: Madison and DOJ review (NOC)
2608	WDC RTC	12/9/93	letter from Leach to Altman re: request for production of Madison documents (NOC)
27352740	WDC RTC	12/9/93	letter from Leach to Gonzalez re: request for Madison hearings (NOC)
4163	WDC RTC	12/9/93	e-mail from Caron to Blakley; Ausen and Corbet re: response to FOIA request # 0982 (NOC)
3324	WDC RTC	12/9/93	letter from Leach to Altman re: request for production of documents (NOC)
592	KC PLS	12/9/93	letter from Rep. Leach to Altman re: request for Madison documents (faxed from RTC North Central on 12/20/93) (131)

Bates #	Source	Date	Description
2657	WDC RTC	12/9/93	letter from Leach to Altman re: request for production of Madison documents (NOC)
583	KC PLS	12/10/93	e-mail from Marcusen to Lee and Adams re: Ward litigation - files in custody of Adams at PLS - Seliga (RTC Tulsa office) assigned to Madison from 1989 - 1991 (122)
4210453	KC PLS	12/10/93	memo from Iorio to Yanda re: attached Madison civil review memo for review and comment - Handwritten notes from Adams to Yanda at bottom of page (119)
1894	WDC PLS	12/13/93	e-mail from Spittler to Stone; Poling; Smith and Goodman re: request for documents from Leach(?) (NOC)
584	KC PLS	12/13/93	file from Hambleton to Adams and Lee re: Ward documents - referred to Adams from Marcusen (123)
587	KC PLS	12/14/93	e-mail from Adams to Foust re: believe documents will be ready next week (124)
586	KC PLS	12/14/93	e-mail from Foust to Adams re: progress on copying of Ward files (124)
585	KC PLS	12/14/93	e-mail from Adams to Hambleton re: Ward documents - referral not responsive under FOIA (125)
18921893	WDC PLS	12/14/93	memo from Smith to Schulz (Schultz?) (cc: Jones; Curtis; Graham; Downey; Thomas; Breslaw; and Hindes) re: Schultz will be point person for Leach's request (copy of 12/09/93 letter from Rep. Leach to Altman attached) (Breslaw's copy) (NOC)
588	KC PLS	12/14/93	e-mail from Hambleton to Adams re: please send Ward docs via office mail (126)
589	KC PLS	12/15/93	e-mail from Binkley to Kaufman - forwarded by Kaufman to Yanda - forwarded by Yanda to Kaufman and Adams re: request from Rep. Leach - check if there is any active commercial litigation - Yanda conferred with Breslaw and acct. claim is closed - KCO PLS wo
26712672	WDC RTC	12/15/93	memo from Breslaw to Smith (cc: Curtis; Jones; Hindes; Thomas; Schultz; Collishaw; Dudine; Graham; Gamble; Downey; Binkley and Spittler) re: Rep. Leach's request for documents (NOC)
4269	WDC RTC	12/15/93	e-mail from Caron to Iorio and Ausen re: Inventory of documents from which documents were obtained as backup to the referrals (NOC)
18901891	WDC PLS	12/15/93	memo from Breslaw to Smith (cc: Curtis; Jones; Hindes; Thomas; Schultz; Collishaw; Dudine; Graham; Gamble; Downey; Binkley and Spittler) re: Rep. Leach's request for documents (NOC)

Bates #	Source	Date	Description
593	KC PLS	12/17/93	memo from Dudine to Iorio (cc: Knight; Carter; Collishaw and Binkley) re: Rep. Leach request for documents (faxed from RTC North Central on 12/20/93) (131)
5900591	KC PLS	12/17/93	memo from Dudine to Iorio (cc: Knight; Carter; Collishaw and Binkley) re: Rep. Leach request for documents - please forward inventories of Madison documents to WDC (12/09/93 letter from Rep. Leach to Altman re: request for Madison documents attached) (han
42674268	WDC RTC	12/17/93	note from Garner re: Tucker file on attached inventory (NOC)
3313	WDC RTC	12/17/93	letter from Williams to Binkley and Lindenmuth re: conversations re: FOIA requests (NOC)
25142515	WDC RTC	12/17/93	memo from Dudine to Iorio (cc: Knight; Carter; Collishaw and Binkley re: attached 12/09/93 letter from Leach to Altman re: production of documents (131)
2655	WDC RTC	12/17/93	letter from Williams to Binkley and Lindenmuth re: Conversations re: RTC's responses to FOIA requests and criminal referrals (NOC)
3486	WDC RTC	12/17/93	letter from Williams to Binkley and Lindenmuth re: conversations re: FOIA requests (NOC)
5960597	KC PLS	12/20/93	e-mail from Kauper to Curtis; Barker; Breslaw; Smith; Gamble; Kaufman; Collishaw; Binkley; Lunsford and Carter re: Plan for response to Rep. Leach's request for Madison documents - forwarded by Breslaw to Yanda re: Breslaw will take count PLS civil files
4266	WDC RTC	12/20/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
2639	WDC RTC	12/20/93	e-mail from Kauper to Curtis; Barker; Breslaw; Smith; Gamble; Kaufman; Collishaw; Binkley; Lunsford and Carter re: Leach request for production of Madison documents (132)
3519	WDC RTC	12/20/93	e-mail from Gamble to Kauper - forwarded from Kauper to Carter re: materials on Madison (NOC)
35503551	WDC RTC	12/20/93	handwritten notes re: Leach's document request (N/A)
3277	WDC RTC	12/20/93	e-mail from Gamble to Kauper re: Madison materials (NOC)
4486	WDC RTC	12/21/93	letter from Caron to Houston (cc: Iorio and Ausen) re: request for production of the FDIC's exams for the Bank of Cherry Valley and The Bank of Yellville for 1983 - most recent (NOC)

Bates #	Source	Date	Description
598	KC PLS	12/21/93	e-mail from Kaufman to Marcusen; Swiss; Lane; Griffee; Cofran; Bennett; Fenton; Garlow; Ostrom; Evans; Carver; Yanda; Hood; Gaw and Stokely re: Marcusen will coordinate response to DC - forwarded by Yanda to Adams and Marcusen (133)
4485	WDC RTC	12/21/93	letter from Caron to Serino (OCC) (cc: Koss; Iorio and Ausen) re: request for production of the OCC's exam reports for First Ozark National Bank for 1984 - 1988 (NOC)
4487	WDC RTC	12/21/93	Certification for the Agreement Regarding Confidential Information signed by Caron (NOC)
6010602	KC PLS	12/22/93	memo from Marcusen to Iorio (cc: Adams) re: ongoing Madison investigations (with attached list of matters involving Madison for reference) (136)
3693	WDC RTC	12/22/93	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
2656	WDC RTC	12/22/93	letter from Altman to Leach re: response to 12/09/93 letter re: production of Madison documents (NOC)
600	KC PLS	12/22/93	e-mail from Adams to Marcusen and Yanda re: telephone conference - referrals not responsive to Rep. Leach's request (135)
46424674	End File No. 29	12/22/93	memo from Iorio to Hinds; Kaufman and Yanda re: attached 12/10/93 Civil Review (137)
6040636	KC PLS	12/22/93	memo from Iorio to Hinds; Kaufman and Yanda re: attached 12/10/93 civil review (Yanda's copy of memo) (137)
3518	WDC RTC	12/22/93	e-mail from Garrett to Carter re: list of all employees who have worked on Madison and list of all documents (NOC)
20522084	WDC PLS	12/22/93	memo from Iorio to Hinds; Kaufman and Yanda re: attached Civil Review of Madison dated 12/10/93 (137)
42614262	WDC RTC	12/22/93	memo from Marcusen to Iorio and Ausen (cc: Adams) re: congressional inquiry into Madison (NOC)
3581	WDC RTC	12/22/93	letter from Altman to Leach re: 12/09/93 request for production of Madison documents (NOC)
3582	WDC RTC	12/22/93	memo from Knight to Geer; Collishaw; Barker; Binkley and Carter (cc: Nye) re: attached response to Leach's 12/09/93 request for production of documents (NOC)

Bates #	Source	Date	Description
35833585	WDC RTC	12/22/93	letter from Fischter (OTS) to Leach re: response to 12/09/93 request for production of documents (NOC)
53065307		12/22/93	letter from Caron to Hall (cc: Iorio) re: documents to support investigation (NOC)
599	KC PLS	12/22/93	e-mail from Adams to Marcusen re: attached list of files that KCO PLS has in its possession (134)
3517	WDC RTC	12/23/93	e-mail from Morgan to Knight; Collishaw and Carter re: questions from Sen. Riegle's staff re: Madison (NOC)
4265	WDC RTC	12/23/93	e-mail from Caron to Iorio re: cases on RLIS list which are subject to investigation (NOC)
5007		12/27/93	handwritten notes re: meeting re: Leach request (NOC)
5006		12/28/93	(12/28/92?) Message for Jim from Iorio with handwritten notes (N/A)
2658	WDC RTC	12/28/93	e-mail from Knight to Collishaw; Binkley; and Lindenmuth re: questions to examine concerning the Leach request (NOC)
2634	WDC RTC	12/28/93	e-mail from Gamble to Iorio - forwarded by Iorio to Cavinaw; Hinton; Jankowski; Garrett and Swiss - forwarded by Garrett to Binkley re: DOJ's position re: response to Madison FOIA requests (NOC)
4162	WDC RTC	12/28/93	e-mail from Gamble to Iorio - forwarded by Iorio to Noyes and Ausen re: DOJ's position re: disclosure of Madison documents and information (NOC)
19571958	WDC PLS	12/28/93	e-mail from Gamble to Iorio - forwarded by Iorio to Cavinaw; Jankowski; Garrett and Swiss - forwarded by Hinton to Knight
2978	WDC RTC	12/28/93	e-mail from Gamble to Iorio re: DOJ's position re: response to Madison FOIA requests (noc)
3276	WDC RTC	12/28/93	e-mail from Hindes to Gamble re: DOJ and Leach's production request - Knight does not feel he is being kept informed (NOC)
26492650	WDC RTC	12/28/93	memo from Knight to Altman re: Status Report on Leach Investigation and requests for documents (NOC)

Bates #	Source	Date	Description
4295	WDC RTC	12/29/93	letter from Steiner (GAO) to Cunninghame (cc: Stinchcum) re: House Committee on Small Business request for GAO investigation of Capital Management Services and request for documents (with handwritten notes) (NOC)
2627	WDC RTC	12/29/93	letter from Steiner (GAO) to Cunninghame (cc: Stinchcum) re: House Committee on Small Business request for GAO investigation of Capital Management Services and request for documents (NOC)
4263	WDC RTC	12/29/93	e-mail from Noyes to Hinton and Iorio re: BOD minutes available for review (NOC)
35553558	WDC RTC	12/29/93	handwritten notes from meeting with Iorio; Turner; Binkley; Hinton and Jankowski re: documents (NOC)
3554	WDC RTC	12/29/93	handwritten notes from meeting in KCO with Marcusen; Swiss; Kaufman; Hinton; Jankowski; Binkley; Cavinaw; Carter re: assignments (NOC)
33093311	WDC RTC	12/30/93	memo from Binkley and Carter to Knight (Gambles's address written in the top right corner) (cc: Cavinaw; Swiss; Kaufman; Marcusen; Hinton; Jankowski; Iorio; Turner; Collishaw; Kauper; Gamble; Breslaw; Hinds; Lindenmuth; Dudine; Garrett and Primrose re: L
4300	WDC RTC	12/30/93	e-mail from Jankowski to Iorio re: media request - "your friend Singer" wanted to know... (NOC)
19551956	WDC PLS	12/30/93	e-mail from Gamble to Hinds re: Information about the DOJ investigation contained in e-mail may not be complete because Gamble was only involved early when Legal and Investigations "were not seeing eye to eye about the filing of the referrals" but any pr
26352637	WDC RTC	12/30/93	memo from Binkley and Carter to Knight (Collishaw's address written in the top right corner) (cc: Cavinaw; Swiss; Kaufman; Marcusen; Hinton; Jankowski; Iorio; Turner; Collishaw; Kauper; Gamble; Breslaw; Hinds; Lindenmuth; Dudine; Garrett and Primrose re:
35143516	WDC RTC	12/30/93	memo from Binkley and Carter to Knight (cc: Cavinaw; Swiss; Kaufman; Marcusen; Hinton; Jankowski; Iorio; Turner; Collishaw; Kauper; Gamble; Breslaw; Hinds; Lindenmuth; Dudine; Garrett and Primrose re: Leach Inquiry - 12/29/93 visit to the KCO - Discussio
35093511	WDC RTC	12/30/93	memo from Knight to Altman (cc: Hanson; Geer and Barker) re: status report on Leach Investigation (NOC)

Bates #	Source	Date	Description
36943696	WDC RTC	12/30/93	(Draft of?) 12/30/93 letter from Binkley and Carter to Knight (cc: Cavinaw; Swiss; Kaufman; Marcusen; Hinton; Jankowski; Iorio; Turner; Collishaw; Kauper; Gamble; Breslaw; Hindes; Lindenmuth and Weatherly) re: Leach Inquiry and 12/29/93 visit to the KCO (
43414351	WDC RTC	12/31/93	Update of 05/29/92 memo from Ryan through Robinson to Iorio (cc: Ausen; Denton; Ramakrishnan; Lee; Yanda; and Curtis) re: Plan of Investigation (NOC)
19431944	WDC PLS	1/3/94	letter from Gamble to Carver (DOJ - Fraud) re: conversation of 12/28/93 re: FOIA requests (NOC)
33163317	WDC RTC	1/3/94	letter from Gamble to Carver re: Madison FOIA requests and confirmation of DOJ's position (NOC)
33283329	WDC RTC	1/3/94	fax from Knight to Gamble re: attached list of meeting attendants?? (Jakel (?); Burrell; Collishaw; Binkley; Dudine; Gamble and Knight) (NOC)
45054506	WDC RTC	1/4/94	letter from Caron to Parham (FDIC) (cc: Iorio and Ausen) re: copies of the FDIC's exam reports for Citizen's Bank and Trust and Union National Bank (NOC)
32843295	WDC RTC	1/4/94	fax from Caron to Dudine re: attached subpoenas (6 page fax?) to Swiss; Swift? and Cavinaw (NOC)
3598	WDC RTC	1/4/94	e-mail from Lindenmuth to Binkley and Primrose re: review of the Madison board meeting minutes (NOC)
5305		1/4/94	letter from Caron to Reign (cc: Ausen) re: Inventory and Copy Project (NOC)
33183319	WDC RTC	1/4/94	letter from Carver to Gamble re: acceptance of information in 01/03/94 letter (see above) and attached 12/17/93 letter from Williams to Binkley and Lindenmuth re: conversations re: FOIA requests (NOC)
5304		1/5/94	e-mail from Caron to Turner re: microfilm other than that transferred from Investigations (NOC)
5305		1/5/94	e-mail from Turner to Caron re: microfilm on Madison (NOC)
640	KC PLS	1/5/94	e-mail from Yanda to many people (all initials) re: inquiries relating to Madison Guaranty are to be directed to Yanda (142)
639	KC PLS	1/5/94	e-mail from Liston to Yanda re: "rat report" - Phone call from Lana re: Madison - forwarded from Yanda to Adams (141)

Bates #	Source	Date	Description
4496	WDC RTC	1/5/94	Confirmation of Iorio's receipt of Lewis' e-mail (See 4497) (N/A)
4497	WDC RTC	1/5/94	e-mail from Lewis to Iorio - re: correction - the Clintons were named as witnesses in referral # 192 and 196 (NOC)
4498	WDC RTC	1/5/94	Confirmation of Ausen's receipt of Lewis' e-mail (See 4501) (N/A)
4499	WDC RTC	1/5/94	Confirmation of Iorio's receipt of Lewis' e-mail (See 4501) (N/A)
4500	WDC RTC	1/5/94	Confirmation of Caron's receipt of Lewis' e-mail (See 4501) (N/A)
638	KC PLS	1/5/94	e-mail from Yanda to Liston re: "rat report" - "did you give her any information" forwarded back by Liston to Yanda with response - forwarded by Yanda to Adams re: copy of e-mail for his file - Yanda curious about why an "OCS paralegal is asking substanti
45014502	WDC RTC	1/5/94	e-mail from Lewis to Iorio (bcc: Caron and Ausen) re: review of 01/05/94 Washington Post article by Schmidt and Isikoff (NNOC)
45034504	WDC RTC	1/5/94	e-mail from Blakley to Caron and Corbet - forwarded by Caron to Iorio; Ausen and Lewis re: response to FOIA request 93-1031 from Smith and Wanner of SNL Securities (See also 4160 - 4161) (NOC)
637	KC PLS	1/5/94	e-mail from Yanda to Hindes; Dudine; Iorio; Penrose; Breslaw; Eisenstein; Kaufman and Adams re: Visit with OCOS - sent by supervisor in order to be "proactive" about the "issues this case would raise" re: referrals and Rose law firm (140)
641	KC PLS	1/5/94	e-mail from Mayberry to Liston re: Call from Bounds in RLIS re: PRAF or PAV re: Madison out of PLS - forwarded from Liston to Bounds with comment that she referred person asking about a two-year old invoice to Washington - forwarded from Liston to Yanda (
4160	WDC RTC	1/5/94	e-mail from Caron to Blakley; and Corbet re: response to FOIA request # 93-1031 (NOC)
4161	WDC RTC	1/5/94	e-mail from Blakley to Caron and Corbet re: response to FOIA request # 93-1031 (NOC)
26412648	WDC RTC	1/5/94	Legi-Slate printout re: 01/01/94 transcript of Leach's comments on CNN's "Evans & Novak" (N/A)

Bates #	Source	Date	Description
42564257	WDC RTC	1/5/94	e-mail from Yanda to Hindes; Dudine; Iorio; Penrose; Breslaw; Eisenstein; Kaufman and Adams - forwarded by Iorio to Ausen; Lewis; Caron and Jankowski re: Visit with OCOS - sent by supervisor in order to be "proactive" about the "issues this case would rai
4258	WDC RTC	1/5/94	e-mail from Lewis to Iorio - forwarded by Lewis to Caron and Ausen re: correction - the Clintons were named as witnesses in referral # 192 and 196 (NOC)
4159	WDC RTC	1/5/94	e-mail from Caron to Blakley; and Corbet re: response to FOIA request # 94-0006 (NOC)
42594260	WDC RTC	1/5/94	e-mail from Lewis to Iorio (bcc: Caron) re: review of 01/05/94 Washington Post article by Schmidt and Isikoff (NOC)
26192620	WDC RTC	1/5/94	memo from Primrose to Knight (cc: Binkley; Lindenmuth; Collishaw and Hinton) re: Follow up Documents for Leach's Staff (NOC)
3599	WDC RTC	1/6/94	e-mail from Binkley to Primrose re: draft of memo re: procedures for determining access to RTC records and Gerrish report (NOC)
643	KC PLS	1/6/94	e-mail from Adams to Caron re: Asked if request was from Reign? Deadline? (144)
644	KC PLS	1/6/94	e-mail from Caron to Adams re: Iorio request that Caron ask Kaufman re: list requested by Reign (144)
44784480	WDC RTC	1/6/94	notes re: Lewis phone call from Shannon (N/A)
5302		1/6/94	memo from Caron to Madison Guaranty File re: Conversation with FBI Financial Analyst Hall re: records at Central Bank & Trust and other requests (NOC)
4477	WDC RTC	1/6/94	e-mail from Lewis to Jankowski; Iorio; Ausen and Caron re: call from Shannon ("I've been lied to by the Justice Department") (NOC)
5010		1/6/94	e-mail from Donohue to Dudine re: 11/22/93 meeting with McKay; Reign; Hall and KCO people - establishment of a procedure to handle investigative materials on a "need to know basis" - only people involved would be Iorio; Ausen; Caron and in DC - Donohue an
642	KC PLS	1/6/94	e-mail from Caron to Adams; Ausen; Iorio re: Voice mail request - FBI would like list of litigation matters at the time of the conservatorship of Madison (144)

Bates #	Source	Date	Description
3600	WDC RTC	1/7/94	e-mail from Hinton to Primrose and Knight re: meeting with Kaufman re: ARLIS Inventoried documents (NOC)
5298		1/7/94	memo from Caron to Madison Guaranty File re: Conversation with FBI SA Reign re: confirmation of the copying of Madison records (NOC)
5009		1/7/94	e-mail from Donohue to File
52905291		1/7/94	letter from Irons to Donohue (cc: Caron and Iorio) re: confirmation of conversation between Reign; Caron and Iorio (with copy of envelope) (NOC)
646	KC PLS	1/10/94	e-mail from Breslaw to Yanda; Hinds; Eisenstein; Dudine; Kaufman; Adams; Iorio; Penrose; Newmark; and Kohn re: Visit from OCOS and Breslaw's response (145)
3322	WDC RTC	1/10/94	letter from Dole et al to Altman re: letter sent to Reno (see above) (NOC)
52965297		1/10/94	[REDACTED] FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
34803481	WDC RTC	1/10/94	letter from Dudine to Steiner re: response to attached 12/29/93 request for production of documents re: Capital Management Services (NOC)
4253	WDC RTC	1/10/94	memo from Cashin to Caron (noted: Hornbuckle) re: Castle Sewer and Water (NOC)
52945295		1/11/94	[REDACTED]
18951896	WDC PLS	1/11/94	letter from Dole et al to Reno (cc: Altman and RTC) re: statute of limitations (NOC)
651	KC PLS	1/11/94	e-mail from Yanda to Breslaw and Adams re: Foust's "reinvestigation" (150)
5286		1/11/94	e-mail from Adams to Ausen re: Madison subpoena dated 12/17/93 - questions re: "LJL" files (130)
6470648	KC PLS	1/11/94	e-mail from Newmark to Breslaw re: thanks for the info - at this time there is no investigation - forwarded by Yanda? (148)
650	KC PLS	1/11/94	e-mail from Iorio to Kaufman; Yanda; Swiss; McNaul; Kohn; Dudine and Cavinaw re: Concern re: releasing documents to OCOS inquiry - Dudine will contact Cox at OCOS (149)

Bates #	Source	Date	Description
25162517	WDC RTC	1/11/94	Routing List from Dudine to Ryan; Barker; Knight; Cunningham; Collishaw; Binkley and Gamble re: attached 01/10/94 letter from Dudine to Richard Steiner (GAO) re: response to request for access to RTC reports on Madison (NOC)
649	KC PLS	1/11/94	e-mail from Newmark to Breslaw re: thanks for the info - at this time there is no investigation - forwarded by Breslaw to Yanda and Adams with comments re: Breslaw question re: investigative report and thanks for forwarding Iorio's e-mail (148)
33203321	WDC RTC	1/11/94	letter from Dole et al to Reno (cc: Altman) re: appointment of a special counsel and statute of limitations issues (NOC)
5287		1/11/94	<div style="border: 1px solid black; padding: 5px;"> <div style="border: 1px solid black; display: inline-block; padding: 2px;">FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury</div> </div>
4255	WDC RTC	1/12/94	
660	KC PLS	1/12/94	e-mail from Breslaw to Yanda and Eisenstein re: SOL - not "appropriate ... to reopen the Madison D&O" case - spoke with Coffren re: McDougal's bankruptcy - thanks for input from "JT" (Thompson?) (159)
659	KC PLS	1/12/94	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>
658	KC PLS	1/12/94	
657	KC PLS	1/12/94	e-mail from Yanda to Breslaw; Adams and Eisenstein re: Breslaw's response to Gary (Davidson) - may be more complicated than simply sending him the new statute (156)
656	KC PLS	1/12/94	e-mail from Adams to Yanda re: will send report out today (NOC)
5292		1/12/94	e-mail from Caron to Adams and Iorio re: Conversation with Stoll - believes he did produce the Borod & Higgins report (158)
653	KC PLS	1/12/94	e-mail from Booz to Yanda and "bjh" (Hickert) - forwarded by Yanda to Breslaw; Eisenstein and Adams re: Call from Davidson re: statute of limitations issue (needs response in two hours) (154)

Bates #	Source	Date	Description
5289		1/12/94	e-mail from Caron to Adams and Iorio re: release of Borod & Higgins report pursuant to 12 U.S.C. 1821(t) and written authorization to release documents (NOC?)
4254	WDC RTC	1/12/94	e-mail from Davidson to Iorio - forwarded by Iorio to Caron and Lewis re: Civil Fraud Review unable to find any additional claims not already addressed in the criminal referrals (NOC)
652	KC PLS	1/12/94	e-mail from Iorio to Kaufman; Yanda; Swiss; McNaul; Kohn; Dudine and Cavinaw re: Response from Cavinaw re: release of documents to OCOS - only certification and billing information re: Rose law firm can be released - forwarded by Yanda to Hindes
654	KC PLS	1/12/94	e-mail from Breslaw to Yanda and Adams re: faxing Davidson new SOL language passed on 12/17/93 (155)
661	KC PLS	1/12/94	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
655	KC PLS	1/12/94	e-mail from Yanda to Adams re: request to send Ken's (Foust?) report on Madison to "JT" (Thompson?) asap (NOC)
664	KC PLS	1/12/94	e-mail from Breslaw to Thompson; Kaufman; Iorio; Hindes; Yanda; and Dudine re: Hiring of Rose law firm - FDIC is conducting investigation - "suggest that Investigations discontinue its inquiry into this matter" (153)
5293		1/12/94	e-mail from Caron to Adams and Iorio re: Invitation to review the 34 boxes the FBI will be taking tomorrow (NOC)
662	KC PLS	1/12/94	e-mail from Iorio to Breslaw
5258		1/13/94	FBI Receipt for Property received from Caron (NOC)
52525254		1/13/94	
41904199	WDC RTC	1/13/94	Civil Fraud Investigation Worksheet prepared by Davidson

Bates #	Source	Date	Description
46134615	WDC RTC	1/13/94	e-mail from Iorio to Dudine and Caron re: attached memos re: (1) difference between MGS&L and MB&T; and (2) information re: records at Madison since being taken over by acquiring institution (with attachments) (NOC)
41804189	WDC RTC	1/13/94	Civil Fraud Investigation Worksheet prepared by Gorski (review of Borod & Higgins report) (NOC)
5285		1/14/94	[Redacted] FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
3686	WDC RTC	1/14/94	e-mail from Hinton to Carter re: Investigation did not call the MA; Cypert until yesterday which is "remarkable" ... "[Cypert] MAY be resourceful to DC for whatever purpose" (NOC)
26242625	WDC RTC	1/14/94	draft memo from Ryan to all VPs and AVPs re: production of documents to Leach (attached 12/22/93 letter from Altman to Leach re: response to 12/09/93 letter re: request for production of Madison documents (NOC)
5109		1/14/94	notes re: conversation with Crocheron - conversation with Farrell re: McCrory branch records (NOC)
41774179	WDC RTC	1/14/94	Civil Fraud Investigation Worksheet prepared by Denton (NOC)
5288		1/14/94	[Redacted]
2600	WDC RTC	1/14/94	memo from Ryan to all VPs and AVPs re: working group of Dudine; Collishaw and Knight for response to Madison materials (NOC)
5106	Begin File No. 35	1/14/94	memo re: closing documents (NOC)
3687	WDC RTC	1/14/94	e-mail from Hinton to Carter; Knight and Binkley re: opinion from House counsel? - Copied closing book (NOC)
5284		1/14/94	[Redacted]
4250	WDC RTC	1/14/94	memo from Halbleib re: Caron re: Check #137 - Ozark Realty / Whitewater (NOC)
4251	WDC RTC	1/14/94	e-mail from Caron to Dudine

Bates #	Source	Date	Description
4252	WDC RTC	1/14/94	e-mail from Dudine to Iorio re: short summary of each referral in preparation for a briefing of Altman (NOC)
24502464	WDC RTC	1/14/94	memo from Minority Staff to Leach re: Rights of a Ranking Minority Member for Access to Agency Records (NOC)
4612	WDC RTC	1/14/94	typed notes from a call with Crocheron re: documents from Central Bank & Trust (NOC)
23502364	WDC RTC	1/14/94	memo from Minority Staff to Leach re: Rights of a Ranking Minority Member for Access to Agency Records (NOC)
23342349	WDC RTC	1/14/94	memo from Seidel to Knight re: Leach document request and attached memo on the rights of Ranking Minority Members' access to agency records (NOC)
42854293	WDC RTC	1/17/94	memo from Breslaw to Hindes; Collishaw; Knight and Dudine (cc: Gabrellian; Binkley and Carter) re: attached New Yorker article; "The Bridges of Madison Guaranty" - "good overview of the whole 'Whitewater' story" (Dudine's copy) - Copy of 01/14/94 letter f
4475	WDC RTC	1/18/94	e-mail from Stewart to Iorio; Priolo; Prasifka and Haver - forwarded by Iorio to Ausen; Lewis; Caron Jankowski; and Hinton re: land sales that are part of Campobello (NOC)
665	KC PLS	1/18/94	e-mail from Carmichael to Yanda (bcc: Adams) re: 01/15/94 phone calls from Rostan of ABC World News Tonight (168)
666	KC PLS	1/18/94	e-mail from Carmichael to Yanda - forwarded by Yanda to Adams re: Yanda also received call from Rostan (168)
5278		1/18/94	<div data-bbox="926 1159 1541 1195" data-label="Text"> <p>FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury</p> </div>
4231	WDC RTC	1/18/94	
52705275		1/19/94	
4224	WDC RTC	1/19/94	

Bates #	Source	Date	Description
4156	WDC RTC	1/19/94	e-mail from Caron to Blakley; Corbet and Ausen re: response to FOIA request # 94-0045 (NOC)
4158	WDC RTC	1/19/94	e-mail from Caron to Blakley; Corbet and Ausen re: response to FOIA request # 94-0024 (NOC)
667	KC PLS	1/19/94	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
4157	WDC RTC	1/19/94	e-mail from Caron to Blakley; Corbet and Ausen re: response to FOIA request # 94-0026 (NOC)
52765277		1/19/94	
5257		1/20/94	FBI Receipt for Property received from Caron (NOC)
5268		1/20/94	memo from Caron to Madison Guaranty File re: Discussions with the FBI (Conley and Reign) (NOC)
32533258	WDC RTC	1/21/94	memo from Davidson through Denton to Breslaw (cc: Iorio)
2741	WDC RTC	1/21/94	handwritten notes re: chronology of government custody of Madison (N/A)
1897	WDC PLS	1/21/94	e-mail from Donohue to Dudine; Watts; Lyons; Iorio; Ausen; Baker and Gamble - forwarded by Gamble to Hinds; Gabrellian and Breslaw re: Conversation with Irons and McKay re: RTC WDC PLS review of possible civil claims re: Madison (referred to 01/11/94 let
3559	WDC RTC	1/21/94	handwritten notes re: meeting with Kulka; Collishaw; Gabrellian; Knight and Binkley re: Madison (NOC)
16941698	WDC PLS	1/21/94	memo from Davidson through Denton to Breslaw re: Madison Guaranty Civil Fraud Review/Active Institution (NOC)
3507	WDC RTC	1/21/94	e-mail from Hinton to Iorio - forwarded by Iorio to Hinton - forwarded by Hinton to Carter re: RTC General Counsel would like a copy of original referral on McDougal (NOC)
5256		1/21/94	FBI Receipt for Property Returned to Caron (NOC)
5008		1/21/94	e-mail from Donohue re: Dudine; Watts; Lyons; Iorio; Ausen; Baker and Gamble re: 01/11/94 letter to Reno re: statute of limitations - conversation with Irons and McKay re: review of potential Madison civil claims (NOC)

Bates #	Source	Date	Description
44714472	WDC RTC	1/21/94	memo from Sherry to Iorio re: Request for documents (handwritten note to cc: Ausen; Foust; and Caron) (handwritten notes re: document location) (NOC)
4284	WDC RTC	1/21/94	e-mail from Iorio to Dudine and Ausen re: Breslaw's 01/17/94 memo - Concerns re: review of investigations work (NOC)
41714176	WDC RTC	1/21/94	memo from Davidson through Denton to Breslaw and Barbieri (cc: Iorio; Foust and Caron) re: Madison Civil Fraud Review (NOC)
3506	WDC RTC	1/24/94	e-mail from Iorio to Hinton - forwarded by Hinton to Carter re: "refer them to Jim Dudine. He has a copy" (NOC)
27432744	WDC RTC	1/24/94	Chronological Listing of Events - Civil Investigation re: Madison (N/A)
5264		1/24/94	e-mail from Caron to Iorio and Ausen re: conversation with Irons re: need to inventory records for Congressional inquiries - Irons said that he had to speak with Fiske first (See also 4611) (NOC)
37673768	WDC RTC	1/24/94	draft of Chronological Listing of Events - Civil Investigation of Madison (with handwritten notes) (N/A)
5267		1/24/94	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
52655266		1/24/94	
4611	WDC RTC	1/24/94	e-mail from Caron to Iorio and Ausen - forwarded by Iorio to Dudine and Ausen re: conversation with Irons re: need to inventory records - Comment by Iorio - "I find it particularly annoying that matters of an internal nature are being discussed [with the
36153616	WDC RTC	1/24/94	Chronological Listing of Events Civil Investigation (N/A)
2222	WDC PLS	1/24/94	Handwritten notes from the 01/24/94 meeting (taken by McCoy? - See 1952 - 1953) (NOC)
5255		1/24/94	FBI Receipt for Property Returned to Caron (NOC)

Bates #	Source	Date	Description
6680669	KC PLS	1/24/94	memo from Kaufman to all KCO Legal re: attached 01/14/94 memo from Ryan to all VPs and AVPs re: working group of Dudine; Collishaw and Knight for response to Madison materials - Kaufman will still coordinate for KCO office (Handwritten note to cc: DMC; G
38193820	WDC RTC	1/24/94	Chronological Listing of Events - Civil Investigation for Madison (N/A)
19521953	WDC PLS	1/24/94	memo from McCoy to Gabrellian (cc: Hindes) re: 01/24/94 meeting of Gabrellian; Stone; Breslaw; Berry; Igo; Arbit and McCoy and assignments - next meeting scheduled for 01/26/94 (NOC)
3390	WDC RTC	1/24/94	Document Inventory for Madison Civil Review (N/A)
33763377	WDC RTC	1/24/94	Chronological Listing of Events Civil Investigation - Madison (N/A)
20392040	WDC PLS	1/24/94	e-mail from Breslaw to Watts; Dudine; Hindes and Gabrellian re: 03/02/94 deadline and special investigation re: potential claims (NOC)
33853386	WDC RTC	1/24/94	Chronological Listing of Events Civil Investigation - Madison (N/A)
21862198	WDC PLS	1/24/94	Legi-Slate print out of Congressional Record of 01/28/94 pages S-359 - S-361 (N/A)
4247	WDC RTC	1/25/94	e-mail from Dudine to Iorio and Cavinaw - forwarded by Iorio to Ausen; Caron; Lewis; Foust; Davidson and Denton re: Per Kulka's and Ryan's request; Watts and Murray will examine if there are any liability claims that are still viable (Team from WDC will b
25662567	WDC RTC	1/25/94	letter from Bachus et al to Gonzalez re: RTC Oversight hearing (NOC)
18601871	WDC PLS	1/25/94	memo from Dudine to Kulka re: attached copies of: (1) ten criminal referrals (copies not attached); (2) Madison Guaranty Criminal Referral Summaries (1861 - 1866); (3) Chronological Listing of Events; Civil Investigation (1867 - 1868); and (4) Criminal In
20322038	WDC PLS	1/25/94	memo from Dudine to Kulka re: enclosed copies of Madison criminal referrals (only copy of "Criminal Referral Summaries" attached) (NOC)
4155	WDC RTC	1/25/94	e-mail from Caron to Blakley
2201	WDC PLS	1/25/94	letter from Bachus et al to Gonzalez re: RTC Oversight hearing (NOC)

Bates #	Source	Date	Description
21282130	WDC PLS	1/25/94	fax from Knight to Hinds re: attached 01/25/94 letter from D'Amato to Altman re: statute of limitations deadline (NOC)
28952901	WDC RTC	1/25/94	memo from Dudine to Kulka re: attached copies of criminal referrals
34973505	WDC RTC	1/25/94	e-mail from Stroman to Carter re: copies of Criminal Investigative Chronology of Events from Investigations attached per Dudine's request (NOC)
3674	WDC RTC	1/25/94	e-mail from Stroman to Carter - forwarded by Carter to Binkley re: Two chronologies sent per Dudine's request - "here are investigations chronologies - pick and choose..." (no attachment) (NOC)
34923496	WDC RTC	1/26/94	e-mail from Stroman to Carter re: copy of Addendum to Criminal Investigative Chronology attached per Dudine's request (NOC)
22202221	WDC PLS	1/26/94	Handwritten notes from the 01/26/94 meeting (taken by McCoy? - See 1952 - 1953) (NOC)
34473450	WDC RTC	1/26/94	Court Docket Sheet for U.S.A. v. McDougal as of 01/26/94 (N/A)
4550	WDC RTC	1/26/94	draft of list of "Outgoing Loan Payments from McDougal Entities 02/24/84 - 04/24/85 (N/A)
3677	WDC RTC	1/26/94	e-mail from Stroman to Carter re: copy of Addendum to Criminal Investigative Chronology attached per Dudine's request (no attachment) (NOC)
3673	WDC RTC	1/26/94	e-mail from Breslaw to Binkley re: suggested change to Madison Chronology re: 12/84 Frost entry (NOC)
2742	WDC RTC	1/26/94	memo from Breslaw to Kulka (cc: Hinds and Gabrellian) re: Madison Chronology of Significant Events with Exhibits (Chronology and exhibits not attached) (NOC)
18981903	WDC PLS	1/26/94	memo from Breslaw to Kulka (cc: Hinds and Gabrellian) re: attached "Chronology of Significant Events with Exhibits" (copy without exhibits) (NOC)
20852086	WDC PLS	1/26/94	memo from McCoy to Gabrellian (cc: Hinds) re: 01/26/94 meeting (Breslaw; Igo; Arbit; Gamble; Soffer; Berry; Walsh; Stone and McCoy) re: Madison assignments and progress reports (NOC)
3308	WDC RTC	1/27/94	e-mail from Gamble to Gabrellian re: Items for Investigations (NOC)
33033306	WDC RTC	1/27/94	memo from Arbit to Breslaw; Igo; Gamble and Gabrellian re: review of 08/31/88 report (NOC)

Bates #	Source	Date	Description
25682570	WDC RTC	1/28/94	letter from Gramm et al to Riegle re: request for a special meeting to consider committee action re: Madison (NOC)
2942	WDC RTC	1/28/94	handwritten notes re: meeting with Hindes and Gabrellian re: Madison Guaranty reinvestigation? (NOC)
2199	WDC PLS	1/28/94	D'Amato News Release re: "all Eight Banking Republicans Ask for Special Meeting on Whitewater; D'Amato Blasts RTC for 'Shocking Delays' in Response to Queries" (N/A)
32213224	WDC RTC	1/28/94	memo from Arbit to Gabrellian; Breslaw; Igo and Gamble (cc: Watts) re: Castle Grande transaction (NOC)
21832185	WDC PLS	1/28/94	letter from Sen. Gramm et al to Riegle re: hearings on Madison (NOC)
45554562	WDC RTC	1/28/94	fax from Dudine to Iorio re: attached: 01/28/94 memo from Gabrellian to Dudine (cc: Hindes) re: attached memoranda re: various tasks: (1) 01/28/94 memo from Arbit to Gabrellian re: Assignments for Investigations; (2) 01/27/94 e-mail from Gamble to Gabrell
36623665	End File No. 22	1/30/94	Handwritten notes from 01/30/94; 01/25/94 and 01/21/94 meetings re: requests for Madison production of documents and information re: referrals (NOC)
45674578	WDC RTC	1/31/94	e-mail from Iorio to Dudine; Watts and Murray (bcc: Lewis) re: attached answers to PLS questions received 01/28/94 (NOC)
2203	WDC PLS	1/31/94	list of documents reviewed by Sen. D'Amato's staff (NOC)
4470	WDC RTC	1/31/94	e-mail from Iorio to Dudine (bcc: Foust) re: IG request for information (See 4471 below) (NOC)
4241	WDC RTC	1/31/94	e-mail from Ausen to Iorio and Caron re: conversation with Irons re: inventory of warehouse records (NOC)
42424243	WDC RTC	1/31/94	e-mail from Lewis to Ausen and Caron re: Madison Fire Drill #3 re: attached information as requested by Gamble re: loss figure for each criminal referral (NOC)
4244	WDC RTC	1/31/94	e-mail from Lewis to Ausen and Caron re: additional information re: loss figures (See 4242 - 4243 above) (NOC)
2224	WDC PLS	1/31/94	Handwritten notes from the 01/31/94 meeting (taken by McCoy? - See 1952 - 1953) (NOC)

Bates #	Source	Date	Description
4579	WDC RTC	1/31/94	e-mail from Lewis to Ausen and Caron re: 01/28/94 memo from Arbit to Gabrellian response to items G 2 & 3 on the appraisers Palmer and Betts (NOC)
29402941	WDC RTC	1/31/94	fax from Fiechter (OTS) to Ryan re: attached 01/19/94 letter from Gonzalez and Schenk re: questions about HomeFed Bank (NOC)
42454246	WDC RTC	1/31/94	e-mail from Lewis to Ausen and Caron re: Madison Fire Drill re: attached information as requested by Arbit re: "significant transactions not yet reviewed in detail" (NOC)
20872088	WDC PLS	1/31/94	memo from McCoy to Gabrellian re: 01/31/94 meeting (Arbit; Igo; Walsh; Breslaw; Gamble; Stone; Berry; Hindes and McCoy) re: progress reports and assignments (NOC)
2961	WDC RTC	2/1/94	e-mail from Gabrellian to Curtis and Gamble re: privileged status of Borod & Higgins report (N/A)
2127	WDC PLS	2/1/94	letter from Altman to Dole re: response to 01/11/94 letter from Dole et al to Reno re: statute of limitations (N/A)
44684469	WDC RTC	2/1/94	memo from Gabrellian to Dudine (cc: Hindes) re: reopening of Madison investigation (N/A)
4616	WDC RTC	2/1/94	letter from Altman to D'Amato re: response to 01/11/94 and 01/25/94 letters re: statute of limitations (N/A)
17051711	WDC PLS	2/1/94	memo from Breslaw to Gabrellian to Arbit; Igo and Gamble re: attached "Civil Fraud Review" (N/A)
3676	WDC RTC	2/1/94	e-mail from Carter to Knight; Collishaw; Dudine; Gabrellian; Binkley; Breslaw; Garrett and Primrose re: receipt of FDIC documents that Leach's staff reviewed (N/A)
3672	WDC RTC	2/1/94	e-mail from Prasifka to Kaufman and Hood - forwarded by Kaufman to Binkley re: review of five recently discovered Madison files re: filings re: Campobello property (N/A)
3230	WDC RTC	2/1/94	memo from Breslaw to Gabrellian; Arbit; Igo and Gamble re: attached "Civil Fraud Review" (copy not attached) (N/A)
4226	WDC RTC	2/1/94	e-mail from Caron to Iorio and Ausen re: response to question re: Whitewater account balance (N/A)
22452251	WDC PLS	2/1/94	memo from Breslaw to Gabrellian; Arbit; Igo and Gamble Re: attached Civil Fraud Review prepared by KCO Office of Investigations (N/A)

Bates #	Source	Date	Description
22252237	WDC PLS	2/1/94	e-mail from Murray to Dudine and Arbit re: attached summary of findings to date re: Madison (N/A)
3632	WDC RTC	2/1/94	letter from Altman to D'Amato re: response to 01/11/94 and 01/25/94 letters re: statute of limitations (N/A)
4200	WDC RTC	2/1/94	e-mail from Davidson to Lewis re: Source of information re: Lion Oil Co.? (N/A)
3675	WDC RTC	2/1/94	e-mail from Kaufman to Collishaw; Gabrellian and Swiss - forwarded by Collishaw to ? re: call from Smith re: request to review documents re: Castle Grande and Hubbell involvement as an attorney (N/A)
36793685	WDC RTC	2/2/94	fax from Carter to Binkley re: attached Index of FDIC documents concerning Rose Law Firm Representation of Madison (N/A)
23932398	WDC RTC	2/2/94	Undated index of FDIC documents concerning Rose Law Firm Representation of Madison (incomplete copy - possible copying error) (Copy of list faxed 02/02/94 from RTC Governmental Relations to RTC Legal) (N/A)
44424448	WDC RTC	2/2/94	Criminal Investigations Response to Internal Review Questions (N/A)
4467	WDC RTC	2/2/94	e-mail from Iorio to Ausen
4201	WDC RTC	2/2/94	e-mail from Lewis to Davidson re: Source of information re: Lion Oil (N/A)
19041917	WDC PLS	2/3/94	letter from Rep. Leach to Altman re: recusal (with exhibits) (N/A)
3485	WDC RTC	2/3/94	letter from Fiske to Ryan (cc: Kulka) re: Special Counsel's investigation (N/A)
36333634	WDC RTC	2/3/94	article in Roll Call; "Leach Suit Over Whitewater Documents Would Test Power of Ranking Members." (N/A)
36353648	WDC RTC	2/3/94	letter from Leach to Altman re: recusal (with complete attachments) (N/A)
23662373	WDC RTC	2/3/94	letter from Leach to Altman re: request for production of documents (attached memo is incomplete) (N/A)

Bates #	Source	Date	Description
25852599	WDC RTC	2/4/94	RTC Office of Governmental Relations Correspondence Referral re: attached 02/03/94 letter from Leach to Altman re: recusal (with complete attachments) (distribution of final response to Knight; Morgan; Primrose; Carter; Lindsey; Martin and Kauper) (N/A)
45654566	WDC RTC	2/4/94	e-mail from Murray to Iorio; Dudine and Arbit - forwarded by Iorio to Lewis; Caron; Ausen; Noyes; Foust; Denton and Davidson re: Questions as a result of the Gerrish & McCreary file review in Memphis (N/A)
22432244	WDC PLS	2/4/94	e-mail from Murray to Iorio
23212325	WDC RTC	2/4/94	(03/04/94?) memo from Smith to Collishaw re: attached 03/03/94 letter from Faircloth to the FDIC re: production of Rose law firm invoices - Downing will provide (copies of 03/03/94 letters attached) (N/A)
25582564	WDC RTC	2/4/94	memo from Schulz to Conflicts Committee (cc: Jones Smith) re: attached 02/04/94 Report on Retention of Rose Law Firm for Madison Guaranty Litigation (N/A)
4154	WDC RTC	2/4/94	e-mail from Caron to Blakley
4463	WDC RTC	2/7/94	Confirmation of Iorio's receipt of Lewis' e-mail (See 4466) (N/A)
4462	WDC RTC	2/7/94	memo from Murray to Ausen; Denton; Lewis; Caron; Noyes; Foust; Davidson and Lexvold (cc: Iorio) re: all correspondence re: Madison should be routed through Murray (N/A)
23792380	WDC RTC	2/7/94	e-mail from Binkley to Collishaw; Knight; Dudine; Gabrellian; Kulka and Lindenmuth re: attached draft of response letter to FOIA requests (copy of draft letter not attached) (N/A)
25562557	WDC RTC	2/7/94	letter from Ryan to Leach (cc: Ryan; Kulka; Binkley; Svevar; Collishaw; Kuiper and O'Brien) re: response to 12/09/93 request for production of documents (N/A)
45634564	WDC RTC	2/7/94	Criminal Investigations Response to Internal Review Questions Re; Gerrish & McCreary Files (N/A)
4464	WDC RTC	2/7/94	Confirmation of Caron's receipt of Lewis' e-mail (See 4466) (N/A)
4465	WDC RTC	2/7/94	Confirmation of Ausen's receipt of Lewis' e-mail (See 4466) (N/A)
4466	WDC RTC	2/7/94	e-mail from Lewis to Iorio

Bates #	Source	Date	Description
21312175	WDC PLS	2/8/94	RTC Office of Governmental Relations Correspondence Referrals for letters to various Congressmen re: response to 02/08/94 letter from Faircloth et al to Altman re: statute of limitations (N/A)
4153	WDC RTC	2/8/94	e-mail from Caron to Blakley
1920	WDC PLS	2/8/94	e-mail from Murray to Breslaw re: Conversation with Lewis re: Arkansas Secretary of State shows Whitewater Corporation names are Clintons and McDougals - Lewis never found Signature Authorization for Whitewater checking account (N/A)
44404441	WDC RTC	2/8/94	e-mail from Murray to Dudine; Gabrellian and Iorio - forwarded by Murray to Ausen; Caron; Davidson; Denton; Foust; Gorski; Halbleib; Lewis; Lexvold and Napoli re: Madison Investigations task force projects and members (N/A)
21222126	WDC PLS	2/9/94	draft memo from Altman to Sen. Faircloth (sent by Knight to Ryan
51245125		2/9/94	memo from Gamble to Gabrellian re: meetings in KCO with Civil and Criminal Frau Units (N/A)
4439	WDC RTC	2/9/94	e-mail from Iorio to all investigations staff
22532268	WDC PLS	2/14/94	memo from Stone to Gabrellian; Igo; Arbit; [Breslaw]; Walsh and Berry re: attached updated RTC - Professional Liability Section - Master Document Index - Madison Guaranty Savings (N/A)
0	RA	2/15/94	draft (4:25 p.m.) of the questions and answers on Whitewater/Madison (N/A)
4152	WDC RTC	2/16/94	e-mail from Caron to Blakley
37383739	WDC RTC	2/16/94	fax from RTC - Legal re: Background on Questions Coming from Committee Members re: Madison (N/A)
24062408	WDC RTC	2/16/94	fax from Knight to Collishaw re: attached 02/15/94 memo from Knight to Kulka (cc: Collishaw; Hindes and Binkley) re: McClain working on the request from Sen. Bond's office in attached 02/15/94 memo from Fisher to Knight re: Rose Law Firm representation of
3671	WDC RTC	2/17/94	e-mail from Binkley to Garrett re: attached unified chronology of criminal events (no attachment) (N/A)
0	RA	2/17/94	draft (6:49 p.m.) of the question and answers on all issues (N/A)

Bates #	Source	Date	Description
3668	WDC RTC	2/17/94	e-mail from Binkley to Carter re: attached draft chronology re: request to review the civil/PLS/Congressional activity (no attachment) (N/A)
3669	WDC RTC	2/17/94	e-mail from Garrett to Binkley re: attached criminal chronology with Dudine's changes (no attachment) (N/A)
3670	WDC RTC	2/17/94	e-mail from Binkley to Garrett; Dudine and Breslaw re: questions that arose from a comparison of attached Garrett's chron and Breslaw's chron (no attachment) (N/A)
37403741	WDC RTC	2/18/94	Answers to questions re: close out file (N/A)
3667	WDC RTC	2/18/94	e-mail from Iorio to Binkley; Dudine; Garrett and Breslaw re: attached answers to 02/17/94 e-mail (no attachment) (N/A)
3666	Begin File No. 23	2/18/94	e-mail from Carter to Binkley and Breslaw re: source of the 07/89 close out memo unknown (N/A)
3653	WDC RTC	2/18/94	letter from D'Amato to Altman re: request for documents re: Rose law Firm and recusal letters and ethics agreements (N/A)
3652	WDC RTC	2/18/94	letter from D'Amato to Altman re: request for production of Madison documents (N/A)
4438	WDC RTC	2/18/94	memo from Davidson to Iorio re: Discussion with Breslaw re: civil fraud claims - Breslaw stated that there would be people who would take a "dim view" of investigating Madison (N/A)
23892391	WDC RTC	2/18/94	memo from Binkley and Jones to Kulka (cc: Collishaw and Barker) re: Congressional Subpoena Powers (N/A)
22692271	WDC PLS	2/18/94	Printout of 02/18/94 article by the Associated Press: Regulators Scramble to Conduct New Review of Madison Guaranty (N/A)
24302449	WDC RTC	2/18/94	memo from Binkley and Svevar to Collishaw (cc: Kulka and Knight) re: Disclosure of Information in Response to Request from Congress (N/A)
0	RA	2/22/94	List of 36 questions faxed from Altman on 02/22/94 with notes from April to Terry (N/A)
0	RA	2/22/94	List of 36 questions faxed from Altman on 02/22/94 (with handwritten notes (not Altman's handwriting) (different from writing on Unbates (9))) (N/A)

Bates #	Source	Date	Description
0	RA	2/22/94	List of 36 questions faxed from Altman on 02/22/94 (with handwritten notes (not Altman's handwriting) (different from writing on Unbates (9) and (10))) (N/A)
0	RA	2/22/94	E-mail from Breslaw to Kulka; Hindes; Gabrellian; Igo; and Arbit re: Altman's testimony and answers to questions in Unbates (8) - (11) (N/A)
0	RA	2/22/94	draft of questions and answers re: Whitewater/Madison (White House contact questions left blank) (N/A)
4151	WDC RTC	2/22/94	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
0	RA	2/22/94	draft of questions and answers re: Whitewater/Madison (with handwritten notes) (two versions) (N/A)
4437	WDC RTC	2/22/94	letter from Caron to Serino (OCC) (cc: Iorio and Ausen) re: request for copies of the OCC's exams for Union National Bank for 1988 - 1993 and Worthern National Bank of Arkansas for 1984 - 1993 (N/A)
44354436	WDC RTC	2/22/94	e-mail from Murray to Dudine; Gabrellian; Arbit and Iorio - forwarded by Iorio to Corbet; Ausen; Denton and Foust re: comments re: ongoing projects list (N/A)
23162318	WDC PLS	2/22/94	fax from Altman? re: Questions for Altman's testimony before the Senate Banking Committee (with post-its to Terry; Tom [Hindes?] and Jim [Igo?] from Breslaw re: question assignments) (N/A)
0	RA	2/23/94	draft of questions and answers re: Whitewater/Madison (N/A)
4433	WDC RTC	2/23/94	e-mail from Caron to Foust and Ausen re: response to list of projects attached to Murray's e-mail (N/A)
34673469	WDC RTC	2/23/94	fax from Critic to Knight re: attached memo from Critic to Knight re: request for documents re: meeting minutes; stock records and list of directors (N/A)
4434	WDC RTC	2/23/94	e-mail from Foust to Murray; Corbet; Caron; Davidson; Denton; Gorski and Iorio re: Collection of responses to Murray's 02/22/94 e-mail re: ongoing projects (N/A)
0	RA	2/23/94	draft of the "OB Q & A" Materials on all issues (N/A)

Bates #	Source	Date	Description
0	RA	2/23/94	E-mail from Hume to Knight re: Whitewater/Madison question index attached (N/A)
2365	WDC RTC	2/23/94	letter from Ryan to D'Amato (cc: Ryan; Adair; Kulka and Kauper) re: response to 02/08/94 letter (Kauper's copy) (N/A)
0	RA	2/24/94	Final version of questions and answers re: Madison/Whitewater provided to Altman for his 02/24/94 testimony before the Senate Banking Committee (N/A)
52625263		2/24/94	letter from Caron to Hall (cc: Iorio and Ausen) re: Arkansas Federal - First American Documents on Chris Wade (N/A)
46324641	WDC RTC	2/24/94	memo from Breslaw to Iorio (cc: Hindes) re: attached copy of the FDIC's 02/17/94 memo from Jones to Hove re: Report on the Retention of the Rose Law Firm (Handwritten notes to cc: Ausen; Lewis; Caron and Foust (??)) (N/A)
0	RA	2/24/94	draft of questions and answers re: Whitewater/Madison (N/A)
44184428	WDC RTC	2/24/94	memo from Caron to Iorio and Ausen re: attached draft letter for FOIA responses and list of documents reviewed by Leach's staff (with attachments) (N/A)
44294432	WDC RTC	2/24/94	List of Madison Ongoing Projects (N/A)
22722289	WDC PLS	2/24/94	memo from Stone to Gabrellian; Igo; Arbit; [Breslaw]; Walsh and Berry re: attached revision of RTC - PLS - Master Document Index (N/A)
0	RA	2/25/94	03/04/94; and 03/08/94 RTC Early Bird's re: emerging Treasury/White House meetings stories (N/A)
22902294	WDC PLS	2/25/94	e-mail from Iorio to Dudine
3748	WDC RTC	2/25/94	e-mail from Farrish to Binkley re: status of list of pending cases? (N/A)
20452051	WDC PLS	2/26/94	memo from Breslaw to Jacobs and Roelle (cc: Seidman; Rosen; Thomas; Monahan; Braceley; Jacobs; Beaty; Roelle; Dudine and Martinelli) re: Request for authorization to Accept Settlement Offer from Frost for \$1.025.000 (signed copy) (N/A)
0	RA	2/28/94	Dole News Release re: Treasury/White House meetings (N/A)

Bates #	Source	Date	Description
0	RA	3/1/94	letter from Rep. Leach to Altman re: resignation from RTC also attached are: (1) 03/01/94 letter from Rep. Leach to Nussbaum et al re: ethics issues involved in Treasury/White House meetings; (2) 02/23/94 letter from Hanson to Rep. Leach re: Altman's need
0	RA	3/1/94	and 02/25/94 D'Amato News Releases re: Treasury/White House meetings
3678	WDC RTC	3/1/94	e-mail from Carter to Neville; Hinton; Lindenmuth; Knight; Hinds; Dudine; Collishaw and Binkley re: attached list of document (no attachment) (N/A)
4417	WDC RTC	3/1/94	e-mail from Sweeter to Langston
4413	WDC RTC	3/2/94	e-mail from Hinds to Gabrellian; Dudine; Igo; Breslaw; Arbit and Berry - forwarded by Dudine to Iorio and Murray - forwarded by Iorio to Foust; Lewis; Caron; Ausen; Cavinaw; Thompson; Dudine and Murray re: IG inquiry - Foust will maintain log of document
3659	WDC RTC	3/2/94	letter from ? to Mitchell re: Tigert nomination consent agreement held until hearing re: RTC's handling of Madison are held
19181919	WDC PLS	3/2/94	e-mail from Murray to Dudine and Hinds - forwarded by Murray to Breslaw re: Discussion of Madison records (N/A)
39753976	WDC RTC	3/2/94	e-mail from Murray to Dudine and Hinds re: Summary of discussion of Madison documents held today (N/A)
4412	WDC RTC	3/2/94	e-mail from Lewis to Foust re: IG's request for documents and documents produced (N/A)
4414	WDC RTC	3/2/94	Confirmation of Ausen's receipt of Lewis' e-mail (see 4416) (N/A)
4415	WDC RTC	3/2/94	Confirmation of Iorio's receipt of Lewis' e-mail (See 4416) (N/A)
4416	WDC RTC	3/2/94	e-mail from Lewis to Iorio and Ausen re: suspicion that someone has "once again" been in my office after hours (N/A)
4411	WDC RTC	3/2/94	Confirmation of Foust's receipt of Lewis' e-mail (see 4412) (N/A)
4407	WDC RTC	3/3/94	e-mail from Hinds to Iorio - forwarded by Iorio to Ausen

Bates #	Source	Date	Description
23992405	WDC RTC	3/3/94	RTC Office of Governmental Relations Correspondence Referral re: attached 03/01/94 fax from Leach to Kusinski of 03/01/94 letter from Leach to Nussbaum et al re: Altman's recusal (copies sent to Kulka; Collishaw; Cooper and Binkley?) (Distribution of fin
0	RA	3/3/94	memo from Knight to Nye (never sent) re: (1) list of meetings between RTC staff and Congressional staff re: Madison attached; (2) 03/03/94 letter from Hanson to Altman re: 01/24/94 meeting between RTC staff and D'Amato's staff (attached) (N/A)
44024406	WDC RTC	3/3/94	e-mail from Iorio to Dudine; Yanda; Foust and Murray (bcc: Lewis) re: attached "IG Requests/Investigative Support" log (copy attached) (N/A)
4408	WDC RTC	3/3/94	Confirmation of Iorio's receipt of Lewis' e-mail (See 4409) (N/A)
36543657	WDC RTC	3/3/94	Opening Statement of D'Amato Hearing on Regulatory Consolidation (N/A)
3658	WDC RTC	3/3/94	News Release from D'Amato re: "Republicans Demand Hearing on Secret White House Briefing" (N/A)
44094410	WDC RTC	3/3/94	e-mail from Lewis to Iorio and Ausen re: call from O'Sullivan and no response from PLS yet (Interesting comments from Lewis on whole situation) (N/A)
39773978	WDC RTC	3/3/94	e-mail from Murray to Dudine re: Update of 3975 - 3976 described above re: document production (N/A)
4401	WDC RTC	3/4/94	e-mail from Lewis to Davidson re: addition to the Lasater list (N/A)
0	RA	3/4/94	RTC News in Brief re: weekly summary of stories on Treasury/White House meetings (N/A)
4150	WDC RTC	3/4/94	e-mail from Caron to Blakley; Corbet and Ausen re: response to FOIA request # 94-0158 - Gerrish report should not be produced (N/A)
4400	WDC RTC	3/4/94	Confirmation of Davidson's receipt of Lewis' e-mail (N/A)
29432947	End File No. 20	3/7/94	fax of questions for the record from Senator Bond from the RTC Oversight Hearing of 02/24/94 (with handwritten notes re: person responsible for answer to question) (N/A)
4385	End File No. 28	3/7/94	e-mail from Caron to Murray

Bates #	Source	Date	Description
43834384	WDC RTC	3/7/94	handwritten memo from Murray to Caron and Iorio re: 03/07/94 letter re: microfilm (N/A)
4280	WDC RTC	3/7/94	memo from Caron to file (cc: Iorio and Ausen) re: FBI letter re: 90 rolls of RTC generated film and "meeting" with Murray (N/A)
3981	WDC RTC	3/7/94	letter from Caron to Iron (cc: Iorio and Ausen) re: RTC Generated Microfilm (N/A)
2333	WDC RTC	3/7/94	fax cover sheet for 13 pages from Collishaw to Carter (may have been for documents 2321 - 2332 described above?) (N/A)
3484	WDC RTC	3/7/94	letter from Gonzalez to Fiske re: response to 03/07/94 letter re: concerns re: hearings (N/A)
34823483	WDC RTC	3/7/94	letter from Fisk to Gonzalez re: strong concerns re: Whitewater hearings (N/A)
4382	WDC RTC	3/7/94	letter from Caron to Irons (cc: Iorio and Ausen re: microfilm (N/A)
23822388	WDC RTC	3/8/94	letter from Leach et al to Gonzalez re: request for attached list of witnesses to appear before the RTC Oversight Board hearing (N/A)
52605261		3/8/94	draft letter from Caron to Fiske (cc: Irons
4399	WDC RTC	3/8/94	e-mail from Lewis to Iorio and Ausen re: no response from PLS re: Lewis speaking with OIC (O'Sullivan) (Lewis' response to "random contact" e-mail) (N/A)
4398	WDC RTC	3/8/94	Confirmation of Ausen's receipt of Lewis' e-mail (See 4399) (N/A)
4397	WDC RTC	3/8/94	Confirmation of Iorio's receipt of Lewis' e-mail (See 4399) (N/A)
4396	WDC RTC	3/8/94	e-mail from Iorio to Dudine; Hinds; Yanda and Murray (bcc: Lewis) re: rumors that Fiske moved records under FBI control (N/A)
4393	WDC RTC	3/8/94	Confirmation of Iorio's receipt of Lewis' e-mail (See 4394) (N/A)
4281	WDC RTC	3/8/94	memo from Caron to files re: call from FBI from Gandolfo (sp?) re: the Garner loan (N/A)
39823985	WDCRTC	3/8/94	fax from Murray to Gabrellian re: attached two draft letters: (1) 03/07/94 letter from Ausen to Richardson (IRS) (cc: Iorio and Murray) re: investigation of Shoemaker; and (2) 03/08/94 letter from Caron to Fiske (cc: Irons

Bates #	Source	Date	Description
2960	WDC RTC	3/8/94	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
43944395	WDC RTC	3/8/94	e-mail from Lewis to Iorio and Ausen re: call from Gabrellian re: call from O'Sullivan and meeting with OIC (N/A)
2295	WDC PLS	3/9/94	memo from Gabrellian to file re: Agenda for 03/09/94 Kulka Briefing re: Madison (N/A)
0	RA	3/9/94	E-mail from Katsanos to Barker re: Contacts with Treasury re: Madison (N/A)
0	RA	3/9/94	E-mail from Kulka to Katsanos re: ABC request for a quote on the Altman White House briefing (N/A)
4392	WDC RTC	3/9/94	Confirmation of Ausen's receipt of Lewis' e-mail (See 4394) (N/A)
4391	WDC RTC	3/9/94	e-mail from Foust to Iorio; Murray; Ausen; Lewis; Davidson and Caron re: phone call from Newsweek re: Rose Law Firm (N/A)
4390	WDC RTC	3/9/94	e-mail from Ausen to Iorio; Jankowski; Caron; Lewis and Foust re: calls from the Associated Press and Newsweek - asked to confirm the spelling of Foust's name (N/A)
4389	WDC RTC	3/9/94	e-mail from Lewis to Iorio and Ausen re: suspicion that someone was tampering with purse (N/A)
4388	WDC RTC	3/9/94	Confirmation of Iorio's receipt of Lewis' e-mail (See 4389) (N/A)
4387	WDC RTC	3/9/94	Confirmation of Ausen's receipt of Lewis' e-mail (See 4389) (N/A)
3944	End File No. 26	3/9/94	letter from Carmichael to Gabrellian (cc: Yanda
2315	WDC PLS	3/10/94	memo from Stone to Gabrellian; Igo; Arbit; [Breslaw]; Walsh and Berry re: attached revision of RTC - PLS - Master Document Index (N/A)
39864149	WDC RTC	3/11/94	
2392	WDC RTC	3/11/94	e-mail from Birkes to lots of people re: Executive Committee meeting (N/A)
42024206	WDC RTC	3/11/94	Printout of KCO - INV Criminal Referrals by Institution # (N/A)

Bates #	Source	Date	Description
3886	WDC RTC	3/11/94	e-mail from Carmichael to all KCO PLS staff - forwarded by Yanda to "rfk" re: Carmichael will coordinate production of the KCO PLS documents to the OIC (N/A)
38843885	WDC RTC	3/11/94	e-mail from Gabrellian to Iorio; Yanda; Dudine; Murray and Hindes re: RTC production to the OIC (N/A)
36603661	WDC RTC	3/11/94	<div style="border: 1px solid black; padding: 10px;"> <p>FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury</p> </div>
5771	End File No. 39	3/11/94	
2320	RTC WDC	3/11/94	
2219	WDC PLS	3/11/94	
3883	Begin file No. 26	3/14/94	
3278	WDC RTC	3/14/94	e-mail from Ausen to Iorio; Caron and Lewis - forwarded by Iorio to Dudine - forwarded by Dudine to Gabrellian and Gamble re: meeting between Smith and Lewis on 03/14/94 (N/A)
1941	WDC PLS	3/14/94	e-mail from Stewart to Hindes re: article re: Investigations and Whitewater - believe Investigations leaked to Leach's staff Legal's attempt to get Investigations to "play down" the role of the Clintons (N/A)
39453962	Begin and End File No. 27	3/14/94	letter from Kulka to Fiske (cc: Gabrellian) re: Confirmation of recent conversations re: request for production of documents (with attached copy of Memorandum of Law re: the RTC's Right of Access to the Books and Records of Madison (N/A)
3491	WDC RTC	3/15/94	(** NOTE - Documents 3491 - are probably from Carter **) 03/15/94 memo from Carter to Knight re: copies of documents re: Madison (N/A)
5005	Begin File No. 32	3/21/94	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>

Bates #	Source	Date	Description
5017	Begin File No. 33	3/21/94	memo from Carmichael to Gabrellian re: additional responsive e-mail (N/A)
34643466	Begin File No. 22	11/15/94	(** NOTE - Documents 3464 - 3490 are probably from Knight **) 11/15/94 e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton - forwarded by Hinton to Knight re: 11/11/93 Washington Post article re: declination of prosecution on first Madison referral
35603561	WDC RTC	12/27/94	handwritten notes re: meetings with Knight; Garrett and Carter re: document productions (NOC)
2440246	KC PLS	1/1/95	Same as 0232 - 0234 above (N/A)
45474549	WDC RTC	1/1/95	Undated handwritten notes (Lewis' writing) re: "to do" items (with handwritten notes) (N/A)
387	KC PLS	1/1/95	Handwritten list of names (that attended a meeting?) (?)
218	KC PLS	1/1/95	Handwritten notes from 10/01/93 conference call with Dudine; Iorio; Lewis and Ausen (NOC)
2190226	KC PLS	1/1/95	Handwritten notes re: various 1992 referrals #C0001 - #C0005? (N/A)
227	KC PLS	1/1/95	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
4546	WDC RTC	1/1/95	Same document as 4541 described above (N/A)
45424545	WDC RTC	1/1/95	Madison Criminal Referral Summaries (handwritten notes at top - "prepared by AMK RTC/DC forwarded to LJJ 01/19/94" (N/A)
4541	WDC RTC	1/1/95	Handwritten list of credit bureau inquiries and addresses for the McDougals (N/A)
45394540	WDC RTC	1/1/95	List of Madison Guaranty FOIA Requests as of 12/08/93 (N/A)
3880389	KC PLS	1/1/95	Handwritten notes of ? regarding meeting re: criminal referrals delivery and concerns (?)
2400243	KC PLS	1/1/95	Same as 0228 - 0231 above (N/A)
215	KC PLS	1/1/95	File folder labeled "Madison Attorney Notes" (N/A)
2470248	KC PLS	1/1/95	Same as 0235 - 0236 above (N/A)
2490250	KC PLS	1/1/95	Same as 0237 - 0238 above (N/A)

Bates #	Source	Date	Description
251	KC PLS	1/1/95	File folder labeled "Madison Correspondence" (N/A)
4526	WDC RTC	1/1/95	Same document as 4170 described above (N/A)
4516	WDC RTC	1/1/95	Same document as 4278 described above (N/A)
44944495	WDC RTC	1/1/95	document as 4256 - 4257 described above (N/A)
257	KC PLS	1/1/95	File folder labeled "Madison Criminal Referral Review" (N/A)
4491	WDC RTC	1/1/95	document as 4169 described above (N/A)
4476	WDC RTC	1/1/95	Same document as 4294 described above (N/A)
4474	WDC RTC	1/1/95	Same document as 4247 described above (N/A)
47424762	WDC RTC	1/1/95	Criminal Referral #730CR0199 (N/A)
4538	WDC RTC	1/1/95	Undated typed notes re: Dardanelle Development Corp. lawsuit (N/A)
122	KC PLS	1/1/95	File folder labeled "Madison Guaranty
38813882	End File No. 25	1/1/95	Undated draft of response to attached 12/09/93 letter from Leach to Altman re: request for production of documents (with handwritten notes) (N/A)
47124728	WDC RTC	1/1/95	Criminal Referral #730CR0196 (N/A)
1060111	KC PLS	1/1/95	Undated Chronology Madison Guaranty Subpoenas (Receipt/Clarification/Production) (N/A)
46954711	WDC RTC	1/1/95	Criminal Referral #730CR0195 (N/A)
46874694	WDC RTC	1/1/95	Criminal Referral #730CR0192 (N/A)
46764686	WDC RTC	1/1/95	Criminal Referral #730CR0190 (N/A)
4675	Begin File No. 30	1/1/95	File folder labeled "Criminal Referrals" (N/A)
46174631	WDC RTC	1/1/95	Copy of Madison Criminal Referral # 730CR0196 (with handwritten 08/23/93 note from Iorio re: changes) (N/A)

Bates #	Source	Date	Description
46094610	WDC RTC	1/1/95	Summaries of three existing criminal referrals (01/21/94 per [Iorio]) (N/A)
217	KC PLS	1/1/95	Handwritten Chronology re: McDougal 03/19/87 criminal referral (N/A)
46064607	WDC RTC	1/1/95	Chronology of Review of Madison documents (01/18/94 per LRI [Iorio]) (N/A)
45524554	WDC RTC	1/1/95	Same document as 4275 - 4277 described above (N/A)
123	KC PLS	1/1/95	File folder labeled "McDougal; James D.; Henley; David; Henley; Jim / Latham; John - Madison Guaranty" (with handwritten notes) (N/A)
124	KC PLS	1/1/95	Information regarding Log # C0003 (N/A)
46034605	WDC RTC	1/1/95	Lewis' copy of the Criminal Investigative Chronology of Events (01/24/94 per LRI [Iorio]) (N/A)
46014602	WDC RTC	1/1/95	Addendum to Criminal Investigative Chronology ("01/25/94 per LRI [Iorio]) (N/A)
149	KC PLS	1/1/95	Draft of answer to Question #6 of the FHLBB Criminal Referral Form (N/A)
1500161	KC PLS	1/1/95	Handwritten first draft of FHLBB Criminal Referral Form and answer to Question #6 (copies to go to Director of Examinations at FHLBB)
45994600	WDC RTC	1/1/95	Certified mail receipt (N/A)
45904593	WDC RTC	1/1/95	Two draft copies of Estimated Criminal Investigation Referral Schedules (with handwritten notes) (N/A)
195	KC PLS	1/1/95	File folder labeled "CRIMINAL INFO.; RTC v. Frost
45854586	WDC RTC	1/1/95	Addendum to Criminal Investigative Chronology (N/A)
45824584	WDC RTC	1/1/95	Same documents as 4242 - 4244 described above (N/A)
45804581	WDC RTC	1/1/95	Same document as 4245 - 4246 described above (N/A)
4608	WDC RTC	1/1/95	Information re: Civil Fraud Investigation (01/21/94 per [Iorio]) (N/A)
42134215	WDC RTC	1/1/95	List of Madison Guaranty FOIA Requests as of 02/15/94 (N/A)

Bates #	Source	Date	Description
516	KC PLS	1/1/95	Same document as 0097 described above (N/A)
2920386	KC PLS	1/1/95	Handwritten notes re: legal review of criminal referrals (N/A)
5180519	KC PLS	1/1/95	Same documents as 0099 - 0100 described above (N/A)
42274230	WDC RTC	1/1/95	Undated Criminal Investigative Chronology of Events (N/A)
521	KC PLS	1/1/95	Same document as 0101 described above (N/A)
522	KC PLS	1/1/95	Same document as 0103 described above (N/A)
523	KC PLS	1/1/95	Same document as 0102 described above (N/A)
4225	WDC RTC	1/1/95	Undated chronology re: Criminal Referrals (N/A)
42204223	WDC RTC	1/1/95	Same document as 2659 - 2662 described above (N/A)
47634771	WDC RTC	1/1/95	Criminal Referral #730CR0203 (N/A)
42164217	WDC RTC	1/1/95	List of Madison Guaranty FOIA Requests as of 02/04/94 (N/A)
4270	WDC RTC	1/1/95	List of Madison Guaranty FOIA Requests as of 12/02/93 (N/A)
5320537	KC PLS	1/1/95	Same document as 0106 - 0111 described above (N/A)
538	KC PLS	1/1/95	Same document as 0113 described above (N/A)
5390542	KC PLS	1/1/95	Same document as 0115 - 0118 described above (N/A)
42104212	WDC RTC	1/1/95	List of Madison Guaranty FOIA Requests as of 02/22/94 (N/A)
42074209	WDC RTC	1/1/95	List of Madison Guaranty FOIA Requests as of 03/11/94 (N/A)
39633974	Begin File No. 28	1/1/95	(**NOTE - Documents 3963 - 3985 (?) are probably from Murray's files **)01/94 Summary Report and Questions from Tom Murray (NOC)
39183943	WDC RTC	1/1/95	Confirmation of receipt of e-mail for 03/11/94 e-mail from Carmichael to all KCO PLS Staff (See 3886 above) (N/A)

Bates #	Source	Date	Description
3917	WDC RTC	1/1/95	KCO PLS Certification Form for LK Mayberry (N/A)
3916	WDC RTC	1/1/95	MISSING??? (N/A)
39133915	WDC RTC	1/1/95	KCO PLS Certification Form for JR Sheldon with attached: (1) 09/29/93 e-mail from Breslaw to McClain; Sheldon and Yanda re: Rose Law Firm questions (See also 0060 described above); and (2) 09/29/93 e-mail from McClain to Davis; Sheldon and Breslaw re: ans
39103912	WDC RTC	1/1/95	KCO PLS Certification Form for J. Booz with attached: (1) 01/12/94 e-mail from Booz to Yanda and Hickert re: call from Davidson re: Civil Fraud Investigation and Statute of Limitations questions (see also 0653 described above); and (2) 01/12/94 e-mail fr
3562	WDC RTC	1/1/95	Note from Steve Primrose
42184219	WDC RTC	1/1/95	List of Madison Guaranty FOIA Requests as of 01/05/94 (N/A)
4640474	KC PLS	1/1/95	Same documents as 0050 - 0060 described above (N/A)
3900395	KC PLS	1/1/95	Handwritten notes re: meeting with Jean Lewis re: criminal referrals - "can't leave this office
44494461	WDC RTC	1/1/95	Handwritten note to Ausen; Foust; Lewis; Caron; Denton and Davidson to review attached review and answer question - route answers through Iorio (Lewis' copy) (with handwritten notes) (N/A)
4386	Begin File No. 29	1/1/95	File folder labeled "LJL/MGSL Follow-up File" (N/A)
400	KC PLS	1/1/95	Handwritten notes re: Conference between McKay; Reign; Gretchen; Donohue; Iorio; Ausen; Yanda and Adams re: document production - "Donohue suggests PLS steps aside." - "Why PLS out?" (?)
4010402	KC PLS	1/1/95	Handwritten notes re: Wall Street Journal article (of 07/09) re: Madison Guaranty and the Rose law firm - "Reexamine April Breslaw in DC Authority to Settle" (NOC)
43314340	WDC RTC	1/1/95	Criminal Referral Timeline and Flowcharts (N/A)
43074309	WDC RTC	1/1/95	Same documents as 0253 - 0255 described above (N/A)
43034304	WDC RTC	1/1/95	Same document as 3267 - 3268 described above (N/A)
454	KC PLS	1/1/95	Handwritten note - "Jean Lewis - " (N/A)

Bates #	Source	Date	Description
42484249	WDC RTC	1/1/95	Undated summaries of three existing criminal referrals (7236CR0003; 7236CR0002 and 7236CR0001) (N/A)
43014302	WDC RTC	1/1/95	Undated Campobello Chronology (N/A)
4271	WDC RTC	1/1/95	Same document as 0573 described above (N/A)
4750484	KC PLS	1/1/95	Same documents as 0062 - 0071 described above (N/A)
4850488	KC PLS	1/1/95	Same documents as 0075 - 0078 described above (N/A)
42984299	WDC RTC	1/1/95	Same document as 4256 - 4257 described above (N/A)
503	KC PLS	1/1/95	Same document as 0082 described above (N/A)
504	KC PLS	1/1/95	Same document as 0085 described above (N/A)
4297	WDC RTC	1/1/95	Same document as 0662 described above (N/A)
5060508	KC PLS	1/1/95	Same document as 0007 - 0009 described above (Adams' copy?) (N/A)
509	KC PLS	1/1/95	Same document as 0095 described above (N/A)
4296	WDC RTC	1/1/95	Inventory of Madison documents (with handwritten notes re: GAO contact) (N/A)
4294	WDC RTC	1/1/95	Same document as 2600 described above with 01/19/94 handwritten note from Iorio to cc: Ausen; Lewis and Caron (Cavinaw's copy) (Additional handwritten notes at bottom of memo to cc: DMC; GAP; DW; JN; K. Orf; LK; JW; RI [Iorio])
4283	WDC RTC	1/1/95	Same document as 0658 described above (N/A)
4282	WDC RTC	1/1/95	Same document as 0661 described above (N/A)
4550459	KC PLS	1/1/95	Handwritten notes re: criminal referral #C0004 (N/A)
53305413		1/1/95	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury

Bates #	Source	Date	Description
1	RTC KCO PLS	1/1/95	File folder labeled "Madison Subpoenas Responded" (N/A)
5319		1/1/95	Same document as 4525 described above (N/A)
54945520		1/1/95	Same documents as 4150 - 4176 described above (N/A)
4	KC PLS	1/1/95	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
54585493		1/1/95	Box Inventory Control Sheets for Boxes S-1 - S-27 and S-29 - S-32 (N/A)
5457		1/1/95	RTC Northern Consolidated Office Record Inventory (N/A)
10	KC PLS	1/1/95	File folder labeled "McDougal" (N/A)
11	KC PLS	1/1/95	Handwritten note "Lee Ausen 7243" (N/A)
14	KC PLS	1/1/95	Handwritten chart showing flow of funds from McDougal to Flowerwood to Madison to Stephens Security Bank to International Paper Realty (N/A)
460047	KC PLS	1/1/95	Same as 0044 - 0045 above (N/A)
54145440		1/1/95	Records Inventory Worksheets for Madison Guaranty Files (N/A)
55215530		1/1/95	Same document as 4180 - 4189 described above (N/A)
200021	KC PLS	1/1/95	Same document as 0018 - 0019 above (N/A)
220023	KC PLS	1/1/95	Notices of Action Taken - Account # 424 (1) Cashier Checks #4878 for \$111
240025	KC PLS	1/1/95	Notice of Action Taken - Account # 2-301-361 charged for cc #4878 for \$111.524.21 that was taken out of Account # 424 (see 0022-0023 above) (N/A)
5328		1/1/95	Same document as 4537 described above (N/A)
5327		1/1/95	Same document as 4535 described above (N/A)
5326		1/1/95	Same document as 4534 described above (N/A)

Bates #	Source	Date	Description
5325		1/1/95	Same document as 4536 described above (N/A)
5324		1/1/95	Same document as 4532 described above (N/A)
5323		1/1/95	Same document as 4533 described above (N/A)
5322		1/1/95	Same document as 4530 described above (N/A)
5321		1/1/95	Same document as 4529 described above (N/A)
47294741	WDC RTC	1/1/95	Criminal Referral #730CR0198 (N/A)
54415456		1/1/95	Criminal Investigations Inventory (N/A)
5749		1/1/95	MISSING? (N/A)
0	RA	1/1/95	Undated draft of questions and answers re: Contact with White House; recusal (N/A)
0	RA	1/1/95	Undated document titled "Possible Answers by Mr. Altman on Whitewater/Madison Questions Posed by the Oversight Board" (N/A)
0	RA	1/1/95	Undated Page 3 from questions and answers entitled "Whitewater/Madison: Conversations with the White House" (N/A)
0	RA	1/1/95	Undated draft copy of the questions and answers on the Madison/Whitewater matter (N/A)
57695770		1/1/95	Same document as 3975 - 3976 described above (N/A)
57675768		1/1/95	Same document as 2243 - 2244 described above (N/A)
57555766	Begin File No. 39	1/1/95	Same document as 3963 - 3974 described above (N/A)
0	RA	1/1/95	List of 36 questions from Altman (with handwritten notes (not Altman's handwriting)) (N/A)
5754	End File No. 38	1/1/95	Same document as 5278 described above (N/A)
2	KC PLS	1/1/95	File folder labeled "Dean Paul
5752		1/1/95	Same document as 4311 described above (N/A)

Bates #	Source	Date	Description
55315533		1/1/95	Same document as 4177 - 4179 described above (N/A)
5748		1/1/95	IG Requests/Investigative Support - Madison (N/A)
57445747		1/1/95	Undated Inventory List re: productions to the IG (N/A)
57345743	Begin File No. 38	1/1/95	Same document as 4284 - 4293 described above (N/A)
56795733	End File No. 37	1/1/95	Same documents as 4331 - 4385 described above (N/A)
56645678		1/1/95	Same documents as 4295 - 4309 described above (N/A)
56435663		1/1/95	Same documents as 4310 - 4330 described above (N/A)
56025642		1/1/95	Same documents as 4253 - 4294 described above (4286 missing) (N/A)
55995601		1/1/95	Same document as 4613 - 4615 described above (N/A)
5598		1/1/95	Same document as 5109 described above (N/A)
55955597		1/1/95	Same documents as 4250 - 4252 described above (N/A)
5594		1/1/95	Same document as 4611 described above (N/A)
55345593		1/1/95	Same document as 4190 - 4249 described above (N/A)
5753		1/1/95	Same document as 4438 described above (N/A)
4979		1/1/95	File folder labeled "Restitution Information" (N/A)
5320		1/1/95	Same document as 4527 described above (N/A)
50305031		1/1/95	Same document as 4471 - 4472 described above (N/A)
50275029		1/1/95	Inventory of Madison documents (with handwritten notes re: GAO contact) (N/A)
5026		1/1/95	Same document as 4295 described above (N/A)
5025		1/1/95	Same document as 4438 described above (N/A)

Bates #	Source	Date	Description
5024		1/1/95	Same document as 4311 described above (see also 0062) (N/A)
5016	End File No. 32	1/1/95	Page 2 of an incomplete unknown e-mail (N/A)
5015		1/1/95	Same document as 0113 described above (N/A)
50135014		1/1/95	Same document as 3267 - 3268 described above (N/A)
50425056	Begin File No. 34	1/1/95	RTC News in Brief Newsletters from 03/04/94 through 11/05/93 (N/A)
49804989		1/1/95	Madison Guaranty Criminal Referral Timelines and Flowcharts (N/A)
74	KC PLS	1/1/95	Same as 0073 above (N/A)
4978		1/1/95	Undated handwritten notes re: Lisa Anspaugh Thompson (Lewis' handwriting) (N/A)
4968		1/1/95	Handwritten notes re: "Girair"? - contains name of Corbet and Berg in notes (N/A)
4965		1/1/95	"National Name Search" - with handwritten phone number for Giroiv of Security Federal Savings and Loan (N/A)
4964		1/1/95	Inventory of boxes for Madison Guaranty with handwritten notes (N/A)
4963		1/1/95	File folder labeled "Indictments" (N/A)
48464849		1/1/95	Same document as 0253 - 0255 described above (N/A)
4823	Begin File No. 31	1/1/95	File folder labeled "Madison Guaranty Savings & Loan Criminal Administrative File - Pre-Sentencing Report" (N/A)
48184822	End File No. 30	1/1/95	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
4817	WDC RTC	1/1/95	File Folder labeled " Related News Articles" (N/A)
47944816	WDC RTC	1/1/95	Criminal Referral #C0004 (with exhibit index) (N/A)
47834793	WDC RTC	1/1/95	Criminal Referral #730CR0211 (N/A)

Bates #	Source	Date	Description
47724782	WDC RTC	1/1/95	Criminal Referral #730CR0210 (N/A)
4990		1/1/95	File folder labeled "Madison Guaranty Savings & Loan Criminal Administrative File" - "Pre-Sentencing Report" (N/A)
52405241	End File No. 36	1/1/95	Undated typed notes from a 02/02/94 conversation between Lewis and Breslaw (N/A)
48	KC PLS	1/1/95	File folder labeled "Madison E-mail File" (N/A)
5301		1/1/95	Same document as 0642 described above (N/A)
5300		1/1/95	Same document as 0643 described above (N/A)
5299		1/1/95	Same document as 0644 described above (N/A)
52795283		1/1/95	Memoranda of Authorization for Subpoena Nos. 69
5269		1/1/95	Same document as 0667 described above (N/A)
5259		1/1/95	Undated handwritten notes re: requests for documents to Caron (?) (N/A)
52485251		1/1/95	Same documents as 4882 - 4885 described above (N/A)
5247		1/1/95	Same document as 4880 described above (N/A)
5246		1/1/95	Same document as 4853 described above (N/A)
50325041	End File No. 33	1/1/95	Same documents as 4284 - 4293 described above (N/A)
52435244		1/1/95	Inventory of documents produced 03/10/94 (N/A)
38683880	Begin File No. 25	1/1/95	Undated draft of Questions and Answers re: Madison Criminal Referrals (with handwritten notes) (N/A)
52375239		1/1/95	Gabrellian's 01/10/94 (?) and 01/30/94 handwritten notes re: meeting with Dudine (?) and Gamble re: criminal referrals (NOC)
52025236		1/1/95	Box Inventory Control Sheet for Box Nos. S-1 - S-17 and S-19 - S-32 (N/A)

Bates #	Source	Date	Description
51435201		1/1/95	Records Inventory Worksheets for boxes 297FSC - 309FSC
51265142		1/1/95	Criminal Investigations Inventory of Boxes CI1 through CI10 and Account Liability Boxes 1 - 5 for Madison Guaranty (N/A)
51185123		1/1/95	Random pages of information gathered by Lewis (?) for various people (N/A)
5117	Begin File No. 36	1/1/95	Same document as 3308 described above (N/A)
5115		1/1/95	Nancy Gorski - Chronological Listing of Research Activity (N/A)
5114		1/1/95	Undated Civil Fraud Investigations Chronological of Events (N/A)
51115113		1/1/95	Same documents as 3388 - 3390 described above (N/A)
5110		1/1/95	Same document as 3816 described above (N/A)
5107		1/1/95	Notes re: Whitewater Development and news articles (N/A)
50575105	End File No. 34	1/1/95	RTC Early Bird Newsletters from 09/29/93 through 03/09/94 (N/A)
5245		1/1/95	Same document as 4857 described above (See also 4853) (N/A)
28852894	WDC RTC	1/1/95	Criminal Referral #730CR0211 (without exhibits) (N/A)
29662977	WDC RTC	1/1/95	Undated handwritten notes re: Madison criminal referrals (N/A)
2096	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0203 (prepared by ?) (N/A)
29642965	WDC RTC	1/1/95	Same document as 0104 - 0105 described above (N/A)
19701977	WDC PLS	1/1/95	Incomplete copy of indictment in U.S.A. v. McDougal
19781979	WDC PLS	1/1/95	Undated draft from Breslaw to Roelle and Eisenstein re: Madison Bond Claim Close-Out (N/A)
29622963	WDC RTC	1/1/95	Same document as 1955 - 1956 described above (N/A)
29482959	Begin File No. 21	1/1/95	Undated Whitewater Current Events; Whitewater Chronology; Questions/Allegations; and Grand Jury Testimony (N/A)

Bates #	Source	Date	Description
19942008	WDC PLS	1/1/95	Madison Guaranty Criminal Referral #7236CR0003 (with handwritten notes) (N/A)
20092022	WDC PLS	1/1/95	Madison Guaranty Criminal Referral #7236CR0002 (with handwritten notes) (N/A)
2097	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0190 (prepared by ?) (with handwritten notes) (N/A)
29112925	WDC RTC	1/1/95	Criminal Referral #7236CR0003 (without exhibits) (with handwritten notes) (N/A)
29792986	WDC RTC	1/1/95	Undated handwritten notes re: Madison criminal referrals (N/A)
2041	WDC PLS	1/1/95	Missing??? (N/A)
20422043	WDC PLS	1/1/95	Same as document 1895 - 1896 described above (N/A)
2044	WDC PLS	1/1/95	List of Madison related files (with handwritten notes re: location of files) (N/A)
28662884	WDC RTC	1/1/95	Criminal Referral #C0004 (without exhibits) (N/A)
28562865	WDC RTC	1/1/95	Criminal Referral #730CR0210 (without exhibits) (N/A)
28492855	WDC RTC	1/1/95	Criminal Referral #730CR0203 (without exhibits) (N/A)
28292848	WDC RTC	1/1/95	Criminal Referral #730CR0199 (without exhibits) (N/A)
2089	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0199 (prepared by ?) (N/A)
2090	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0198 (prepared by ?) (N/A)
2091	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0195 (prepared by ?) (N/A)
20922093	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0192 (prepared by ?) (N/A)
24092424	WDC RTC	1/1/95	RTC Legal Division Congressional Inquiry Abstract & Routing Form sent to Kulka; Collishaw; Cooper and Binkley re: attached 03/01/94 letter from Leach to Altman re: attached copies of: (1) 03/01/94 letter from Leach to Nussbaum
29262939	WDC RTC	1/1/95	Criminal Referral #7236CR0002 (without exhibits) (with handwritten notes) (N/A)

Bates #	Source	Date	Description
31573176	WDC RTC	1/1/95	Criminal Referral 730CR0199 (with handwritten notes) (without exhibits) (N/A)
18781879	WDC PLS	1/1/95	Same documents as 0556 - 0557 described above (N/A)
38873909	WDC RTC	1/1/95	KCO PLS Certification Form re: OIC request for production of documents from CD Curtis; DA Vorbeck; SA Williams; BJ Hickert; JS Torkelson; WJ Kirk; KK Claxton; JF Yanda; KS Gensler; S Pedigo; DM Lowe; JL Liston; A Palazola; RM Shepard; RK Kantack; LK Swerc
1881	WDC PLS	1/1/95	Same document as 0569 described above (N/A)
32083215	WDC RTC	1/1/95	Undated Summaries of Institution- Generated Criminal Referrals (N/A)
1883	WDC PLS	1/1/95	Same document as 1873 described above (N/A)
32063207	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0??? (with handwritten notes) (N/A)
1885	WDC PLS	1/1/95	Same document as 0582 described below (N/A)
32043205	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0192 (with handwritten notes) (N/A)
31943203	WDC RTC	1/1/95	Criminal Referral 730CR0211 (with handwritten notes) (without exhibits) (N/A)
19591960	WDC PLS	1/1/95	Same as document 1890 - 1891 described above (N/A)
31773183	WDC RTC	1/1/95	Criminal Referral 730CR0203 (with handwritten notes) (without exhibits) (N/A)
1954	WDC PLS	1/1/95	Same as document 0637 described above (N/A)
31453156	WDC RTC	1/1/95	Criminal Referral 730CR0198 (with handwritten notes) (without exhibits) (N/A)
31293144	WDC RTC	1/1/95	Criminal Referral 730CR0196 (with handwritten notes) (without exhibits) (N/A)
31133128	WDC RTC	1/1/95	Criminal Referral 730CR0195 (with handwritten notes) (without exhibits) (N/A)
31063112	WDC RTC	1/1/95	Criminal Referral 730CR0192 (with handwritten notes) (without exhibits) (N/A)
30963105	WDC RTC	1/1/95	Criminal Referral 730CR0190 (with handwritten notes) (without exhibits) (N/A)

Bates #	Source	Date	Description
30913095	WDC RTC	1/1/95	Undated copy of the Madison Guaranty Criminal Referral Summaries (N/A)
19211940	WDC PLS	1/1/95	Undated Two copies of pages 3 - 12 of notes prepared by Murray (per handwritten note at bottom of page 3) (N/A)
30813090	WDC RTC	1/1/95	Criminal Referral Timelines and Flowcharts (N/A)
1942	WDC PLS	1/1/95	Handwritten notes re: chronology of referral info - reference to Carmichael memo and "Bernie" (N/A)
30753080	WDC RTC	1/1/95	Undated copy of the Madison Guaranty Criminal Referral Summaries (N/A)
19471951	WDC PLS	1/1/95	Copy of Undated Chronology of Significant Events (with handwritten marks) (N/A)
30713074	WDC RTC	1/1/95	Copy of legislation to extend the statute of limitations (N/A)
31843193	WDC RTC	1/1/95	Criminal Referral 730CR0210 (with handwritten notes) (without exhibits) (N/A)
25712583	WDC RTC	1/1/95	Same document as 2186 - 2198 described above (N/A)
20942095	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CRC0004 (prepared by ?) (N/A)
2651	WDC RTC	1/1/95	Leach Inquiry on Madison - "To do list week of Jan. 3 - 8" (different from list on 2638 described above) (N/A)
2640	WDC RTC	1/1/95	Same as document 2627 described above (N/A)
2638	WDC RTC	1/1/95	Leach Inquiry on Madison - "To do list week of Jan. 3 - 8" (N/A)
26282633	WDC RTC	1/1/95	Not produced - Non-Responsive (N/A)
2626	WDC RTC	1/1/95	Madison File Inventory with handwritten notes re: availability of files (N/A)
2623	WDC RTC	1/1/95	Same as document 2600 described above (faxed on 01/14/94 from RTC OGR to RTC Legal) (N/A)
26212622	WDC RTC	1/1/95	Undated draft of memo from Knight to Altman re: response to Leach request for information relating to Madison (with handwritten notes) (N/A)

Bates #	Source	Date	Description
26012607	WDC RTC	1/1/95	Undated draft of letter from Altman to Leach re: response to 01/14/94 request for production of documents with attached "RTC Staff Memorandum Responding to House Banking Minority Staff Memorandum" (N/A)
22382242	WDC PLS	1/1/95	Undated Madison Chronology of Significant Events (N/A)
2584	WDC RTC	1/1/95	Same document as 2199 described above (N/A)
26592662	WDC RTC	1/1/95	Undated typed notes for Phil (Lindenmuth?) re: Madison FOIA requests (N/A)
2565	WDC RTC	1/1/95	Same document as 2200 described above (N/A)
25502555	WDC RTC	1/1/95	Undated Binkley draft of response to Leach 01/14/94 production of documents request (N/A)
25182549	WDC RTC	1/1/95	Not produced - Non-Responsive (N/A)
25122513	WDC RTC	1/1/95	Undated Madison Sequence of Events re: government actions and list of Madison documents maintained by the government (with handwritten notes form Casey (Carter) to Peter (Knight)) (N/A)
25102511	WDC RTC	1/1/95	Undated Madison Sequence of Events re: government actions and list of Madison documents maintained by the government (N/A)
2509	WDC RTC	1/1/95	Undated Madison Sequence of Events re: government actions (N/A)
24942508	WDC RTC	1/1/95	Same document as 2465 - 2479 described above without the RTC Legal Division Abstract & Routing Form attached (N/A)
23742378	WDC RTC	1/1/95	List of Madison Guaranty and Rose Law Firm FOIA requests (attached lists of Institutions that the Rose Law Firm has represented on the RTC's behalf and Legal Matters assigned to the Rose Law Firm (N/A)
24842493	WDC RTC	1/1/95	RTC Legal Division Congressional Inquiry Abstract & Routing Form sent to Collishaw; Binkley and Hindes re: attached 03/07/94 letter from Leach to Ryan (cc: General Counsel of FOIA and Gonzalez) re: request for documents with attached: (1) 12/22/93 letter
2381	WDC RTC	1/1/95	Undated copy of answers to questions related to providing for the hearing record documents related to Madison (N/A)

Bates #	Source	Date	Description
24802483	WDC RTC	1/1/95	RTC Legal Division Congressional Inquiry Abstract & Routing Form sent to Collishaw; Binkley and Hindes re: attached 03/08/94 letter from Leach to Ryan (cc: Gonzalez) re: RTC Oversight hearings (distribution of final response to: Ryan; OGR Staff; Hinton an
24652479	WDC RTC	1/1/95	RTC Legal Division Congressional Inquiry Abstract & Routing Form (PLS) sent to Hindes (cc: Collishaw and Binkley) re: attached 03/04/94 memo from Smith to Collishaw re: attached 03/03/94 letters from Faircloth to Hove (Chair of FDIC) re: FDIC investigatio
2319	RTC WDC	1/1/95	(** NOTE Documents 2319 - 2694 (File No. 18?) are probably from Collishaw **)03/14/94 e-mail from Collishaw to Gabrellian and Binkley re: copied all materials from his files re: Madison (N/A)
27452749	WDC RTC	1/1/95	Undated Madison Chronology of Significant Events (N/A)
20982099	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0196 (prepared by ?) (with handwritten notes) (N/A)
2100	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0211 (prepared by ?) (with handwritten notes) (N/A)
2101	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0210 (prepared by ?) (N/A)
21022108	WDC PLS	1/1/95	Summaries or Institution- Generated Criminal Referrals (7236CR0003
21092118	WDC PLS	1/1/95	Criminal Referral Timelines Institution 7236 - Madison and Referral Flowcharts (N/A)
28172828	WDC RTC	1/1/95	Criminal Referral #730CR0198 (without exhibits) (N/A)
28012816	WDC RTC	1/1/95	Criminal Referral #730CR0196 (without exhibits) (N/A)
27942800	WDC RTC	1/1/95	Criminal Referral #730CR0192 (without exhibits) (N/A)
27782793	WDC RTC	1/1/95	Criminal Referral #730CR0195 (without exhibits) (N/A)
21762182	WDC PLS	1/1/95	RTC Office of Governmental Relations Correspondence Referral to various Congressmen (Cohen and Chafee) re: response to 02/08/94 letter from Faircloth et al to Altman re: statute of limitations (attached 02/09/94 e-mail from O'Brien to Washington re: two a
26522654	WDC RTC	1/1/95	Same document as 2635 - 2637 described above (N/A)
27502754	WDC RTC	1/1/95	Undated Addendum to Criminal Investigative Chronology (with handwritten notes) (N/A)

Bates #	Source	Date	Description
1877	WDC PLS	1/1/95	Same document as 1876 described above (N/A)
2734	WDC RTC	1/1/95	Index of Documents Relating to Criminal Referrals made by the RTC (N/A)
2733	Begin File No. 20	1/1/95	(** NOTE Documents 2733 - 2894 are probably from Kulka's files and her office's files **) 03/14/94 memo from Kulka to Gabrellian re: Search for Documents Responsive to Areas Covered by Subpoena to Roger Altman (N/A)
2202	WDC PLS	1/1/95	Missing??? (N/A)
2732	End File No. 19	1/1/95	Spread Sheet of Maple Creek Farms Reserve for Development (N/A)
22042206	WDC PLS	1/1/95	Question and answer re: Madison criminal referrals (N/A)
2207	WDC PLS	1/1/95	Question and answer re: Madison criminal referrals (page 9 of a briefing book?) (N/A)
22082218	WDC PLS	1/1/95	Removed for privilege - Case Plan and Budget for the RTC's civil investigation (N/A)
27012731	WDC RTC	1/1/95	Madison Guaranty S&L Checking Account Statements for Whitewater Development Corp. (Acct. # 2301515) for various months (N/A)
2673	WDC RTC	1/1/95	Undated (12/22/93 fax line) letter from Hove (FDIC) to Leach re: response to request for production of documents (N/A)
2670	WDC RTC	1/1/95	Page 2 of Schmidt's request for Madison documents (See 3804 - 3805 of Treasury production for complete document) (N/A)
2223	WDC PLS	1/1/95	Same document as 2039 - 2040 described above (N/A)
26632669	WDC RTC	1/1/95	Index of documents reviewed by Leach's staff as of 01/12/94 (N/A)
27682777	WDC RTC	1/1/95	Criminal Referral #730CR0190 (without exhibits) (N/A)
35863588	WDC RTC	1/1/95	Same document as 3514 - 3516 described above (N/A)
36493651	WDC RTC	1/1/95	RTC OGR Correspondence Referral re: 02/08/94 letter from D'Amato to Knight re: questions from Nappi (distribution to Kulka; Kauper and OGR) - 02/08/94 e-mail from O'Brien to Knight and Carter re: referral should go to Kusinski (not Lynn) (N/A)

Bates #	Source	Date	Description
32163220	WDC RTC	1/1/95	Undated Madison Guaranty Criminal Referral Summaries (N/A)
36173627	WDC RTC	1/1/95	Same document as 3421 - 3433 described above (N/A)
36113614	WDC RTC	1/1/95	Undated Criminal Investigation Chronology of Events (N/A)
3610	WDC RTC	1/1/95	Same document as 2600 described above (N/A)
36043609	WDC RTC	1/1/95	Notes from Carol O'Brien (OGR) to Gorman re: return of materials per conversation with Primrose (materials attached - 01/11/94 letter from Dudley to Mack (cc: Cavinaw) (NOC)
36013603	WDC RTC	1/1/95	Same documents as 3320 - 3322 described above (N/A)
35943597	WDC RTC	1/1/95	Same document as 3316 - 3319 described above (N/A)
3593	WDC RTC	1/1/95	Leach Inquiry on Madison - "To do list week of Jan. 3 - 8" (with handwritten notes) (N/A)
34873490	WDC RTC	1/1/95	Same documents as 3316 - 3319 described above (N/A)
5940595	KC PLS	1/1/95	Same documents as 0590 - 0591 described above (N/A)
3688	WDC RTC	1/1/95	Not produced - Non-responsive (N/A)
3580	WDC RTC	1/1/95	Notes from Steve Primrose - "Information from my own files re: Madison Criminal Referrals" (N/A)
35783579	WDC RTC	1/1/95	Same document as 2619 - 2620 described above (N/A)
35643577	WDC RTC	1/1/95	Undated copy of questions and answers re: Whitewater/Madison for Altman (N/A)
3563	WDC RTC	1/1/95	See description of document above (N/A)
603	KC PLS	1/1/95	Same as document 0592 described above (N/A)
0	Roger Altman	1/1/95	Undated draft of Questions and Answers re: Madison; Recusal; etc. (with handwritten notes (N/A)
3549	WDC RTC	1/1/95	Handwritten notes re: people involved in Madison and their positions and phone numbers (N/A)
35473548	WDC RTC	1/1/95	Undated Madison Sequence of Events re: government actions and list of Madison documents maintained by the government (N/A)

Bates #	Source	Date	Description
3546	WDC RTC	1/1/95	Undated Madison Sequence of Events re: government actions (N/A)
35423545	WDC RTC	1/1/95	Same document as 2659 - 2662 described above (N/A)
1880	WDC PLS	1/1/95	Same document as 0562 described above (N/A)
3508	WDC RTC	1/1/95	Same document as 3486 described above (N/A)
35893592	WDC RTC	1/1/95	Missing? (N/A)
37753780	WDC RTC	1/1/95	Undated draft of Criminal Investigative Chronology of Events (with handwritten notes) (N/A)
38663867	End File No. 24	1/1/95	Undated list of Criminal Referral Files (N/A)
38543860	Begin File No. 24	1/1/95	Same document as 2245 - 2251 described above (N/A)
38473853	End File No. 23	1/1/95	Same document as 3401 - 3407 described above (N/A)
38263828	WDC RTC	1/1/95	Undated Criminal Investigative Chronology of Events (N/A)
38243825	WDC RTC	1/1/95	Undated Addendum to Criminal Investigative Chronology (N/A)
38213823	WDC RTC	1/1/95	Undated Addendum to Criminal Investigative Chronology (N/A)
38173818	WDC RTC	1/1/95	Same document as 3740 - 3741 described above (N/A)
3796	WDC RTC	1/1/95	KCO Document Distribution Cover Sheet to Binkley re: Madison closeout information "per your earlier conversation with Richard Iorio" (unsure of complete set of attachments - see documents described below) (NA/)
3795	WDC RTC	1/1/95	Undated note re: date of global close- out (N/A)
3628	WDC RTC	1/1/95	Same document as 2199 described above (N/A)
3781	WDC RTC	1/1/95	Undated Chronology of government action on Madison ("Casey" written at top) (N/A)
36893692	WDC RTC	1/1/95	Same document as 2659 - 2662 described above (N/A)

Bates #	Source	Date	Description
37693774	WDC RTC	1/1/95	Undated draft of Madison: Chronology of Significant Events (with handwritten notes) (N/A)
37593766	WDC RTC	1/1/95	Undated Madison: Chronology of Significant Events (N/A)
3758	WDC RTC	1/1/95	Same document as 3670 described above (N/A)
3757	WDC RTC	1/1/95	Undated draft of government action on Madison (with handwritten notes) (N/A)
37493756	WDC RTC	1/1/95	Undated Madison: Chronology of Significant Events (N/A)
37423747	WDC RTC	1/1/95	Undated Criminal Investigative Chronology of Events (N/A)
5740575	KC PLS	1/1/95	Same document as 0115 - 0116 described above (N/A)
3737	WDC RTC	1/1/95	Same document as 3675 described above (N/A)
3736	WDC RTC	1/1/95	Background on Questions Coming from Committee Members Relating to Madison (N/A)
3727	WDC RTC	1/1/95	Same document as 3486 described above (N/A)
37233726	WDC RTC	1/1/95	Same document as 3316 - 3319 described above (N/A)
36973698	WDC RTC	1/1/95	Undated draft of memo from Knight to Altman re: response to Leach request for information relating to Madison (with handwritten notes) (N/A)
37893794	WDC RTC	1/1/95	Undated draft of Criminal Investigative Chronology of Events (with handwritten notes) (N/A)
15721691	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0211 with exhibits (N/A)
7620788	KC PLS	1/1/95	"Records Inventory Worksheet" (NOC)
35123513	WDC RTC	1/1/95	Same document as 1957 - 1958 described above (N/A)
816	KC PLS	1/1/95	File folder labeled "Madison Criminal Referrals" (N/A)
3237	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0198 (with handwritten notes) (N/A)
8850924	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0192 with exhibits (N/A)

Bates #	Source	Date	Description
9251029	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0195 with exhibits (N/A)
10301146	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0196 with exhibits (N/A)
11471258	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0198 with exhibits (N/A)
12591464	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0199 with exhibits (N/A)
645	KC PLS	1/1/95	Same document as 0644 described above (N/A)
15441571	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0210 with exhibits (N/A)
6910761	KC PLS	1/1/95	Madison Guaranty Paid Off/REO Loans List and Bank Records Inventory (NOC)
1692	WDC PLS	1/1/95	Undated "Civil Fraud Investigations Chronological of Events" prepared by Davidson (N/A)
1693	WDC PLS	1/1/95	Undated "Chronological Listing of Research Activity" prepared by Gorski? (N/A)
3236	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0199 (with handwritten notes) (N/A)
16991704	WDC PLS	1/1/95	Undated "Criminal Investigative Chronology of Events" (N/A)
3235	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0203 (N/A)
3234	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0210 (with handwritten notes) (N/A)
3233	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0211 (with handwritten notes) (N/A)
3232	WDC RTC	1/1/95	Undated handwritten notes re: Criminal Referral 730CR0195 (N/A)
3231	WDC RTC	1/1/95	Undated summary of Criminal Referral 730CR0190 (with handwritten notes) (N/A)
32253229	WDC RTC	1/1/95	Not produced - Non-responsive (N/A)
1874	WDC PLS	1/1/95	Same document as 0120 described above (N/A)
1875	WDC PLS	1/1/95	Same document as 0553 described above (N/A)
14651543	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0203 with exhibits (N/A)

Bates #	Source	Date	Description
33323346	WDC RTC	1/1/95	Madison Guaranty Criminal Referral 7236CR0003 (with handwritten notes) (N/A)
34723479	WDC RTC	1/1/95	Undated Criminal Investigative Chronology of Events (N/A)
34703471	WDC RTC	1/1/95	Undated Madison Sequence of Events re: government actions and list of Madison documents maintained by the government (N/A)
34513463	End File No. 21	1/1/95	Same document as 3434 - 3446 described above (N/A)
34343446	WDC RTC	1/1/95	Indictment in U.S.A. v. McDougal
33993400	WDC RTC	1/1/95	Undated unsigned memo from Breslaw to Eisenstein and Roelle (cc: Rosen; Thomas; Beaty; Roelle; Dudine; Eisenstein; Braceley; Bartley; Martinelli; and Asbacher) re: Bond Claim Close-Out (N/A)
33973398	WDC RTC	1/1/95	Undated unsigned memo from Breslaw and Scott to Eisenstein and Roelle (cc: Rosen; Thomas; Beaty; Roelle; Dudine; Eisenstein; Braceley; Bartley; Martinelli; and Asbacher) re: Termination of D&O Liability Investigation (N/A)
33913395	WDC RTC	1/1/95	Undated Madison Chronology of Significant Events (N/A)
33783384	WDC RTC	1/1/95	Undated Civil Fraud Investigations Chronological of Events (N/A)
33733375	WDC RTC	1/1/95	Undated Criminal Investigative Chronology of Events (N/A)
33703372	WDC RTC	1/1/95	Undated Criminal Investigative Chronology of Events (N/A)
7890815	KC PLS	1/1/95	"Records Inventory Worksheet" (NOC)
33473360	WDC RTC	1/1/95	Madison Guaranty Criminal Referral 7236CR0002 (with handwritten notes) (N/A)
32383239	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0196 (with handwritten notes) (N/A)
33303331	WDC RTC	1/1/95	Same document as 2516 - 2517 described above (N/A)
3327	WDC RTC	1/1/95	Same document as 2627 described above (N/A)
33253326	WDC RTC	1/1/95	Undated copy of list of Madison Professional Liability Files: Civil Matters (N/A)

Bates #	Source	Date	Description
3323	WDC RTC	1/1/95	Undated copy of Section 603.1 - Jurisdiction of the Independent Counsel (N/A)
33143315	WDC RTC	1/1/95	Missing? (N/A)
3312	WDC RTC	1/1/95	Leach Inquiry on Madison - "To do list week of Jan. 3 - 8" (N/A)
32963302	WDC RTC	1/1/95	Docket Sheet for Case # 93-CR- 147-ALL as of 01/26/94 in U.S.A. v. Hale
3273	WDC RTC	1/1/95	Same as document 0083 described above (N/A)
32653266	WDC RTC	1/1/95	Same document as 0117 - 0118 described above (N/A)
3263	WDC RTC	1/1/95	Same document as 0113 described above (N/A)
674	KC PLS	1/1/95	Inventory for #7236 Madison Guaranty S&L (with handwritten notes) (NOC)
33613369	WDC RTC	1/1/95	Same document as 2902 - 2910 described above (with handwritten notes) (N/A)
5260527	KC PLS	1/11/95	Same document as 0104 - 0105 described above (N/A)

Sort by Date

OIG Production -- Hanson

16-Feb-95

Bates	Source	Type	Date	To / cc	From	Subject
DOT06267	Jean Hanson	Notes				Handwritten notes re: RTC, press inquiries, Altman, etc.
DOT06281	Jean Hanson	Q & A				Q & As re: criminal referrals, Altman, etc.
DOT11130	Asst. GC (Law and Ethics) -- Central Files	Memo		Jean Hanson	Robert Cesca	Provision of legal advice and services to IG with hand written notes on page
DOT06264	Jean Hanson	Calendar	9/27/93			Calendar for week of 9/27/93
DOT06266	Jean Hanson	Calendar	1/31/94			Calendar for week of 10/31/94
TOIG234	Francine Kerner	Letter	3/28/94	John Adair	Robert Fiske	Response to Adair's 3/25 letter, Prefer that OIG not investigate until OIC investigation is finished
TOIG052	Robert Cesca	Letter	6/22/94	Jean Hanson	Alfonse D'Amato, Donald Riegler	Request for information according to Resolution 229
DOT10804	Asst. GC (Law and Ethics) -- Central Files	Memo	6/27/94	Jean Hanson, cc: Dennis Foreman, Francine Kerner	Robert Cesca	Provision of legal advice and services to IG
DOT10780	Asst. GC (Law and Ethics) -- Central Files	Memo	6/27/94	Jean Hanson, cc: Dennis Foreman, Francine Kerner	Robert Cesca	Provision of legal advice and service to IG
ROIG3313	Office of Investigation Master Files	Memo	6/27/94	Jean Hanson	Robert Cesca	Provision of Legal Advice and Services to OIG

Bates	Source	Type	Date	To / cc	From	Subject
TOIG170	Francine Kerner Secretary	Phone Message	6/30/94	Robert Cesca	Jack Adair	Phone messages from Jack Adair dated 6/30/94 and 7/27/94
TOIG175	Office of Investigation, OIG	Notes	7/5/94			Meeting at MT- Adair, Switzer, Black, Blight, Cesca, & Kerner
DOT08275	Asst. GC (Law and Ethics) -- Central Files	Affidavit	7/20/94	Francine Kerner	Harvey Pitt, Jean Hanson	Affidavit of Hanson re: WHS / Treasury contacts re: MGSL
ROIG3290	Office of Investigation Master Files	Letter	7/22/94	Robert Cesca	Alfonse D'Amato, Donald Riegler	7/22/94 Letter stating the DOT had not completely complied with SBC document production request, copy of this letter is faxed from Bob Cesca to Jack Adair
OGE1783	OGE	Submission	7/22/94	Jane Ley	Matt Murley, Jean Hanson	Submission on behalf of Hanson in connection with Treasury IG and RTC IG Case No. 94-1-031-1
OGE1817	OGE	Submission	7/24/94	Jane Ley	Matt Murley, Jean Hanson	Submission on behalf of Hanson in connection with Treasury IG and RTC IG Case re: WHS / Treasury contacts (Original)
ROIG3539	John Adair	E-Mail	7/26/94	John Adair	Stephen Katsanos	Questions that may come up on the propriety of this sharing will be directed to Treasury, then a handwritten note saying Adair called Katsanos to say he did not know in advance that questions on this matter should be referred to Treasury

Bates	Source	Type	Date	To / cc	From	Subject
DOT11124	Asst. GC (Law and Ethics) -- Central Files	Memo	7/28/94	Ed Knight	Kenneth Schmalzbach	Ryan and Adair telephone calls
OGE2231	OGE	Memo	9/30/94	Roger Altman	Jean Hanson	Memo regarding the Rose Law Firm in the "Early Bird"
DOT06265	Jean Hanson	Calendar	10/14/94			Calendar for week 10/14/93
FROIG0001	Patricia Black	Chronology	2/2/95			Chronology of events prepared by Black from calendars of Black, Switzer, and Adair in preparation for FBI interview

SENT BY DATE

OIG -- Index of Documents

16-Feb-95

Bates	Source	Type	Date	To / cc	From	Subject
ROIG0562	RTC OIG	Deposition				Transcript of Neil Eggleston
DOT11393	Asst. GC (Law and Ethics) -- Central Files	Options Paper				Document with points and handwritten notes with heading "Options Paper", and sub-headings Interviews, Documents, and Investigations
ROIG1329	RTC OIG	Deposition				Transcript of Eugene Ludwig
ROIG1281	RTC OIG	Deposition				Transcript of Ellen Kulka
ROIG1249	RTC OIG	Deposition				Transcript of Stephen Katsanos
ROIG1175	RTC OIG	Deposition				Transcript of Stephen Katsanos
ROIG1105	RTC OIG	Deposition				Transcript of Harold Ickes
ROIG1031	RTC OIG	Deposition				Transcript of Jean Hanson
ROIG0839	RTC OIG	Deposition				Transcript of Jean Hanson
ROIG1430	RTC OIG	Deposition				Transcript of Beth Nolan
ROIG0630	RTC OIG	Deposition				Transcript of Dennis Foreman
ROIG1474	RTC OIG	Deposition				Transcript of Bernard Nussbaum
ROIG0446	RTC OIG	Deposition				Transcript of Jack DeVore
ROIG378	RTC OIG	Deposition				Transcript of Glion Curtis
ROIG337	ROIG	Deposition				Transcript of Bowman

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Bates	Source	Type	Date	To / cc	From	Subject
ROIG279	RTC OIG	Deposition				Transcript of Altman
ROIG197	RTC OIG	Deposition				Transcript of Altman
ROIG0163	RTC OIG	Deposition				Transcript of Aboussie
DOT11438	Peter Rittling	Notes		Shanon Conaway		Stephen McHale DOT stationary with handwritten message "Provide Redacted Transcripts to Private Counsel & WHS"
DOT11437	Robert McNamara	Notes				Stephen McHale DOT stationary with handwritten message "Why did you order the IG to give transcripts to WHS"
DOT11400	Stephen McHale	Q & A				Answers to Senator Grassley's follow-up questions in connection with nomination of Ed Knight
DOT11398	Stephen McHale	Q & A				Q & A's about whether or not the "Treasury" documents were provided to WHS prior to the SBC hearings
TOIG120	Francine Kerner	Memo		James Cottos cc: Robert Cesca	Francine Kerner	Written questions from Senator Bond re: MGSL
ROIG0811	RTC OIG	Deposition				Transcript of Mark Gearan
ROIG3288	Blight -- Office of Investigation Master Files	Notes				Handwritten notes of meeting, "Katsanos" and "Early Bird" -- written on top of notes
TOIG091	Francine Kerner	Timeline				Timeline on access to transcripts

Bates	Source	Type	Date	To / cc	From	Subject
TOIG087	Francine Kerner	Letter				Part of letter addressing the issue of sharing transcripts with the WHS
TOIG086	Francine Kerner	Notes				Various names and numbers handwritten
TOIG037	Robert Cesca	Notes				List of six names with last point saying -- next 10 days
TOIG025	Robert Cesca	Timeline				Timeline on Access to Transcripts
TOIG0003	Robert Cesca	Timeline				Timeline on Access to Transcripts
ROIG3834	John Adair	Outline				Outline of certain matters in July and August of 1994
ROIG3828	Steve Switzer	Chronology				7/22 - 7/29 chronology handwritten re: OGE Report
ROIG3712	RTC OIG	Letter				Corrections to Hanson interview
ROIG1369	RTC OIG	Deposition				Transcript of Thomas McLarty
ROIG3423	Sara Herlihy	Notes				Handwritten notes of various meetings
DOT11382	Asst. GC (Law and Ethics) -- Central Files	Fax Cover Sheet		Ed Knight, cc: Dennis Foreman, Robert McNamara	Joel Klein	
ROIG3282	Office of Investigation Master File	Questions		Treasury, RTC	OGE	Questions from OGE
ROIG3270	Blight --Office of Investigation Master File	Notes			Clark Blight	Blight handwritten notes referring to transcripts, Fiske and WHS access

Bates	Source	Type	Date	To / cc	From	Subject
ROIG2198	RTC OIG	Deposition				Transcripts as Marked for Redaction by RTC Legal
ROIG1961	RTC OIG	Report				Draft Report of Investigation with Appendices
ROIG1960A	RTC OIG	Deposition				Additional pages of McLarty transcript
ROIG1938	RTC OIG	Deposition				Transcript of Margaret Williams
ROIG1916	RTC OIG	Deposition				Transcript of George Stephanopoulos
ROIG1762	RTC OIG	Deposition				Transcript of Joshua Steiner
ROIG1702	RTC OIG	Deposition				Transcript of Cliff Sloan
ROIG1640	RTC OIG	Deposition				Transcript of William Roelle
ROIG1574	RTC OIG	Deposition				Transcript of Benjamin Nye
ROIG3480	Patricia Black	Notes				Handwritten notes -- "Jane Sherburne 4:30 Treasury" in top left hand corner, meeting notes with reference to access to documents
DOT10753	Asst. GC (Law and Ethics) -- Central Files	Letter		Donald Riegler	Michael Levy	Response to Riegler's 10/28/94 letter, answers to Bond questions on attachments
DOT10971	Kenneth Schmalzbach	Chronology				Chronology re: sharing IG transcripts with Cutler
DOT11396	Stephen McHale	Notes				Handwritten Notes with reference to OIC , documents and the Treasury

Bates	Source	Type	Date	To / cc	From	Subject
DOT10955	Stephen McHale	Letter		William Codinha	Robert McNamara	Letter in response to 10/19/94 letter from Codinha which requested additional information from Bentsen
DOT10938	Asst. GC (Law and Ethics) -- Central Files	Timeline				Timeline on access to transcripts
DOT10934	Asst. GC (Law and Ethics) -- Central Files	Timeline				Timeline on depositions
DOT10933	Asst. GC (Law and Ethics) -- Central Files	Notes				Handwritten notes with heading "Shelby" on top
DOT10874	Asst. GC (Law and Ethics) -- Central Files	Deposition				Part of Hanson deposition
DOT10863	Asst. GC (Law and Ethics) -- Central Files	Deposition				Part of Nussbaum deposition
DOT10859	Asst. GC (Law and Ethics) -- Central Files	Deposition				Part of Katsanos deposition
ROIG0502	RTC OIG	Deposition				Transcript of James Dudine
DOT10843	Asst. GC (Law and Ethics) -- Central Files	Deposition				Part of Dudine deposition
DOT10984	David Dougherty	Questions				Follow up items from 8/3/94 Bentsen testimony before SBC

Bates	Source	Type	Date	To / cc	From	Subject
DOT10737	Asst. GC (Law and Ethics) -- Central Files	Deposition				Page 67 of Bentsen testimony with handwritten notes at end re: rules governing Treasury officials
DOT10714	Asst. GC (Law and Ethics) -- Central Files	Chronology				Draft chronology of WHS / Treasury contacts
DOT10713	Asst. GC (Law and Ethics) -- Central Files	Notes				IG fact-finding
DOT10711	Asst. GC (Law and Ethics) -- Central Files	Notes				Typed notes re: IG deposition transcripts to counsel for Treasury witnesses
DOT10705	Asst. GC (Law and Ethics) -- Central Files	Notes				Typed noted re: IG deposition transcripts to counsel for Treasury witnesses
DOT06995	Asst. GC (Law and Ethics) -- Central Files	Report		Central Files	Asst. GC (Law and Ethics)	Office of IG, US DOT Report on investigation of # 94-1-031-I, WHS / Treasury contacts
DOT06281	Jean Hanson	Q & A				Q & As re: criminal referrals, Altman, etc.
DOT06267	Jean Hanson	Notes				Handwritten notes re: RTC, press inquiries, Altman, etc.
OGE2253	OGE	Chronology				Clean chronology starting with 9/27/93
OGE1952	OGE	List				Name List
OGE1950	OGE	List				List of dates of contacts with participants and type of contact

Bates	Source	Type	Date	To / cc	From	Subject
DOT10848	Asst. GC (Law and Ethics) -- Central Files	Deposition				Part of Curtis deposition
DOT11151	Stephen McHale	Q & A				Q & A re: Why did Treasury give Transcripts to WHS
DOT11361	Peter Rittling	Q & A				Q & A re: were the "Treasury" documents provided to The WHS prior to the SBC Whitewater hearings.
DOT11359	Peter Rittling	Notes				Handwritten Notes with mention of a 5/24 3:30 meeting, Jackson & Lewis in D.C.
DOT11351	Bernetta Smith	Letter		Ellen Kulka	Dennis Foreman	Letter in response to 6/14/94 Kulka letter
DOT11346	Bernetta Smith	Letter		Ellen Kulka	Dennis Foreman	Response to 6/6/94 Kulka letter
DOT11340	Bernetta Smith	Q & A				Q & A beginning with question: "When did you decide to give the White House the documents Treasury had produced to Independent Counsel Fiske? Why?"
DOT11339	David Dougherty	Letter		Ed Knight	Joel Klein	Follow up to discussion where Klein requested the information the DOT provided to the OIC pertaining to certain meetings with WHS Staff
DOT11336	David Dougherty	Q & A				Answers to follow-up to Ed Knight Q & A's

Bates	Source	Type	Date	To / cc	From	Subject
DOT11326	David Dougherty	Notes				Handwritten Notes with numbers 1-3 circled, "White House will not see" underlined
DOT11320	Robert McNamara	Notes				Handwritten Notes with 1 - 23 circled at beginning of each new sentence
DOT10967	Kenneth Schmalzbach	Timeline				Timeline on access to transcripts
DOT11308	Robert McNamara	Q & A				Questions about whether or not IG gave WHS and witnesses copies of interviews before the investigation was complete
DOT11074	David Hamill	Talking Points				Talking points about questions relating to WHS / Treasury contacts investigation, WHS, etc.
DOT11148	Stephen McHale	Notes				Handwritten notes from note book mentioning "history of doc'nt production" and that "IG decided to send transcripts" at request of Bentsen
DOT11144	Asst. GC (Law and Ethics) -- Central Files	Talking Points				Talking Points responding to the accusations in press re: Cutler sharing transcripts
DOT11131	Asst. GC (Law and Ethics) -- Central Files	Questions				Questions about the OGE report
DOT11130	Asst. GC (Law and Ethics) -- Central Files	Memo		Jean Hanson	Robert Cesca	Provision of legal advice and services to IG with hand written notes on page

Bates	Source	Type	Date	To / cc	From	Subject
DOT11114	Asst. GC (Law and Ethics) -- Central Files	Q & A				Q & A's for Senate Banking Interview
DOT11110	Kenneth Schmalzbach	Statement				Statement on access to depositions by WHS counsel
DOT11082	June Gayle Turner	Talking Points				Concern over Kit Bond's accusations in the press about Cutler's access to transcripts
DOT11080	Veronica Dawson	Talking Points				Concern over Kit Bond's accusations in the press about Cutler's access to transcripts
DOT11086	Peter Rittling	Typed Answers			Peter Rittling	Answers to Bond questions
DOT11078	Ed Knight	Talking Points				Concern over Kit Bond's accusations in press about Cutler's use of Depositions
DOT11076	David Hamill	Article				Draft of article -- "Treasury Secretary Sought Interview Documents from Ongoing Ethics Review" By John Solomon and Pete Yost Associated Press Writers
DOT11311	Robert McNamara	Notes				Handwritten Notes, heading "from the beginning we have bent over backwards to cooperate w/ OIC"
DOT11128	Asst. GC (Law and Ethics) -- Central Files	Statement			DOT	Statement on Access to IG transcripts by witnesses

Bates	Source	Type	Date	To / cc	From	Subject
TOIG218	James Cottos	Notes				Handwritten notes from staff meeting on either 6/24/94 or 7/24/94. Interviews next week for DAIG position.
ROIG1961	RTC OIG	Report				Draft Report with Appendices (Bates Nos. 1961- 2197)
TOIG0003	Robert Cesca	Timeline				Timeline on access to transcripts
DOT11129	Asst. GC (Law and Ethics) -- Central Files	Statement				Statement on access to depositions by WHS counsel
TOIG221	Francine Kerner	Timeline				Timeline on access to transcripts. From 7/1-7/30.
DOT11111	Kenneth Schmalzbach	Letter				Letter re: propriety of combining investigations
ROIG0426	RTC OIG	Deposition				Transcript of Gary Davis
DOT10956	Stephen McHale	Timeline				Timeline on access to transcripts
DOT10936	Asst. GC (Law and Ethics) -- Central Files	Chronology				Chronology re: sharing IG transcripts with Cutler
ROIG2536	RTC OIG	Transcripts				Transcripts as marked for Redaction by RTC Legal -- Part II (Bates Nos. 2536-2975)
ROIG2198	RTC OIG	Transcripts				Transcripts as marked for Redaction by RTC Legal -- Part I (Bates Nos. 2198-2535)
DOT06264	Jean Hanson	Calendar	9/27/93			Calendar for week of 9/27/93

Bates	Source	Type	Date	To / cc	From	Subject
DOT11318	Robert McNamara	Memo	5/5/94	Stephen McHale	Robert McNamara	Inter-office memo asking if McHale had any comments or suggestions re: letter to Cutler
DOT11349	Bernetta Smith	Letter	5/5/94	Mark Stein	Stephen McHale	[Redacted] FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
DOT11319	Robert McNamara	Memo	5/5/94	Robert McNamara	Stephen McHale	5/5/94 Stein Letter, any comments?
DOT11304	Robert McNamara	Cover Sheet	5/10/94	Robert McNamara		Cover sheet with heading "For your correspondence file on Madison/Whitewater"
DOT11363	Asst. GC (Law and Ethics) -- Central Files	Memo	5/12/94	Dennis Foreman, Kenneth Schmalzbach	Robert McNamara	Talking points/ letter
DOT11382	Asst. GC (Law and Ethics) -- Central Files	Letter	5/12/94	Lloyd Bentsen	Lloyd Cutler	[Redacted]
DOT11384	Asst. GC (Law and Ethics) -- Central Files	Letter	5/12/94	Ed Knight	Joel Klein	[Redacted]
TOIG064	Robert Cesca	Memo	5/13/94	James Cottos, Raisa Cesario, cc: Robert Cesca	Francine Kerner	Discussion on Whitewater
TOIG095	Francine Kerner	Memo	5/13/94	James Cottos, Raisa Cesario, cc: Robert Cesca	Francine Kerner	Discussion on Whitewater

Bates	Source	Type	Date	To / cc	From	Subject
DOT11383	Asst. GC (Law and Ethics) -- Central Files	Letter	5/13/94	Robert McNamara	Harvey Pitt	Letter stating previous conversation about the decision of the Treasury to provide the documents to the Counsel to the President
DOT11312	Robert McNamara	Letter	5/16/94	Ellen Kulka	Dennis Foreman	Re: 6/14/94 letter
TOIG068	Robert Cesca	Article	5/19/94			"Whitewater Counsel: Delay Staff Interviews"
DOT11373	Asst. GC (Law and Ethics) -- Central Files	Letter	5/23/94	Robert Fiske	Alfonse D'Amato	Letter questioning whether or not WHS had access to Treasury documents
DOT11378	Asst. GC (Law and Ethics) -- Central Files	Fax Cover Sheet	5/24/94	Stephen McHale	Andrew Tomback	[Redacted] FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury [Redacted]
DOT11374	Asst. GC (Law and Ethics) -- Central Files	Letter	5/25/94	Lloyd Bentsen	James Leach	Request for documents
DOT11375	Asst. GC (Law and Ethics) -- Central Files	Memo	5/25/94	Ed Knight		Request for materials related to WHS / Treasury / RTC contacts, due date 6/2/94. Distribution: Under Secretary / Domestic Finance Legislative Affairs
DOT11372	Asst. GC (Law and Ethics) -- Central Files	Letter	5/26/94	Alfonse D'Amato	Robert Fiske	Fiske responding to 5/23/94 letter

Bates	Source	Type	Date	To / cc	From	Subject
DOT11375	Asst. GC (Law and Ethics) -- Central Files	Letter	5/26/94	Lloyd Bentsen	James Leach	Request for materials re: Whitewater / MGSL circumstances
DOT11400	Stephen McHale	Memo	6/1/94	The Record	Stephen McHale	FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
DOT11402	Stephen McHale	Memo	6/2/94	the Record	Stephen McHale	
DOT11371	Asst. GC (Law and Ethics) -- Central Files	Fax Cover Sheet	6/3/94	Stephen McHale	Sheila Cheston	
OGE2121	RTC	Memo	6/6/94	David Kuhnsman	Susan Tibola	Memo re: the need for RTC employees to maintain confidentiality of records
DOT10952	Stephen McHale	Calendar	6/13/94			Calendar page for week of 6/13/94
DOT11366	Asst. GC (Law and Ethics) -- Central Files	Fax	6/14/94	Dennis Foreman, cc: Newman	Ellen Kulka	Fax and letter about certain documents in Treasury possession relating to RTC
DOT11385	Asst. GC (Law and Ethics) -- Central Files	Letter	6/22/94	Ellen Kulka	Dennis Foreman	Response to her 6/14/94 letter
TOIG039	Robert Cesca	Letter	6/22/94	Ed Knight	Michael Davidson	Thank you for being able to deliver the listed Treasury officials
TOIG040	Robert Cesca	Letter	6/22/94	Lloyd Bentsen	Alfonse D'Amato, Donald Riegler	Request for information according to Resolution 229

Bates	Source	Type	Date	To / cc	From	Subject
TOIG048	Robert Cesca	Letter	6/22/94	Joan Logue-Kinder	Alfonse D'Amato, Donald Riegler	Letter requesting information according to Resolution 229
TOIG050	Robert Cesca	Letter	6/22/94	Roger Altman	Alfonse D'Amato, Donald Riegler	Request for information according to Resolution 229
TOIG054	Robert Cesca	Letter	6/22/94	Dennis Foreman	Alfonse D'Amato, Donald Riegler	Request for information according to Resolution 229
DOT10778	Asst. GC (Law and Ethics) -- Central Files	Letter	6/22/94	Lloyd Bentsen	Donald Riegler, Alfonse D'Amato	Request for records according to Resolution # 229
DOT11416	Fran Davis	Letter	6/22/94	Lloyd Bentsen	Alfonse D'Amato, Donald Riegler	Request for records under the Senate Resolution 229
TOIG215	James Cottos	Notes	6/22/94			Notes from staff meeting on Whitewater
TOIG052	Robert Cesca	Letter	6/22/94	Jean Hanson	Alfonse D'Amato, Donald Riegler	Request for information according to Resolution 229
ROIG3276	Kerner -- Office of Investigation Master File	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with OGE
ROIG3382	Office of Investigation Master File	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with OGE
TOIG194	Office of Investigation, OIG	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with OGE
TOIG056	Office of Investigation, OIG	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with OGE

Bates	Source	Type	Date	To / cc	From	Subject
DOT10954	Stephen McHale	Letter	6/23/94	Jane Sherburne	Stephen McHale	Letter stating that enclosed are transcripts of all interviews, except McLarty's, conducted by IG
TOIG182	Office of Investigation, OIG	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with Schmalzbach and McNamara
TOIG204	Office of Investigation, OIG	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with Schmalzbach and McNamara
TOIG198	Office of Investigation, OIG	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with Schmalzbach and McNamara.
TOIG056	Robert Cesca	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with OGE
TOIG060	Robert Cesca	Memo	6/23/94	James Cottos, Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with Schmalzbach and McNamara
TOIG100	Francine Kerner	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with Schmalzbach and McNamara
TOIG200	Office of Investigation, OIG	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with OGE
TOIG085	Francine Kerner	Memo	6/23/94	Francine Kerner, cc: Kenneth Schmalzbach	Robert McNamara	Attorney names and addresses
TOIG062	Robert Cesca	Memo	6/23/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Meeting with Schmalzbach and McNamara

Bates	Source	Type	Date	To / cc	From	Subject
TOIG038	Robert Cesca	Memo	6/23/94	Francine Kerner, cc: Kenneth Schmalzbach	Robert McNamara	Attorney names and addresses for interviewees
ROIG3302	Blight -- Office of Investigation Master Files	Notes	6/24/94			Handwritten note of meeting, 1201 NY Ave 5th floor underlined in upper left hand corner
ROIG3267	Office of Investigation Master File	E-Mail	6/26/94	Stephen Katsanos, cc: Steve Switzer, fwd: Blight	John Adair	States that his office only gave the people who were interviewed copies of their testimony in order to make any corrections
ROIG3266	Office of Investigation Master File	E-Mail	6/26/94	John Adair	Stephen Katsanos	Message about Cutler testimony at SBC Hearings
ROIG3313	Office of Investigation Master Files	Memo	6/27/94	Jean Hanson	Robert Cesca	Provision of Legal Advice and Services to OIG
DOT10982	Kenneth Schmalzbach	Calendar	6/27/94			Calendar pages for week of 6/27/94
ROIG3472	Patricia Black	Fax, Letter	6/27/94		Patricia Black, Clark Blight	Fax with outline of Contacts report
DOT10780	Asst. GC (Law and Ethics) -- Central Files	Memo	6/27/94	Jean Hanson, cc: Dennis Foreman, Francine Kerner	Robert Cesca	Provision of legal advice and service to IG
DOT10804	Asst. GC (Law and Ethics) -- Central Files	Memo	6/27/94	Jean Hanson, cc: Dennis Foreman, Francine Kerner	Robert Cesca	Provision of legal advice and services to IG

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3314	Herlihy -- Office of Investigation Master Files	Notes	6/28/94			Miscellaneous meeting notes
ROIG3511	Steve Switzer	Notes	6/28/94			Various handwritten notes from staff meeting
TOIG187	Office of Investigation, OIG	Memo	6/29/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Updates on Whitewater
TOIG207	Office of Investigation, OIG	Memo	6/29/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Update on Whitewater
DOT11012	Departmental Executive Secretariat	Letter	6/30/94	John Ryan	Lloyd Bentsen	Request that RTC cooperate with the IG and OGE
DOT11010	Departmental Executive Secretariat	Memo	6/30/94	Robert Cesca	Lloyd Bentsen	Investigation of WHS / Treasury contacts concerning MGSL
DOT10773	Asst. GC (Law and Ethics) -- Central Files	Memo	6/30/94	Robert Cesca	Lloyd Bentsen	Investigation of WHS / Treasury contacts re: MGSL
TOIG029	Robert Cesca	Statement	6/30/94	Ed Knight	Mark Stein	Statement from OIC on Washington Investigation
DOT11011	Departmental Executive Secretariat	Letter	6/30/94	Stephen Potts	Lloyd Bentsen	Asking OGE to begin investigation since Fiske done

Bates	Source	Type	Date	To / cc	From	Subject
OGE2180	Treasury	Letter	6/30/94	Stephen Potts	Lloyd Bentsen	Letter from Bentsen to Potts stating OIC investigation into WHS / Treasury contacts has been completed and requesting OGE to begin an investigation
ROIG3436	Lew Sherman	Calendar	6/30/94			Handwritten notes from calendar
TOIG235	Francine Kerner	Letter	6/30/94	Lloyd Bentsen	Robert Fiske	Completion of WHS / Treasury contacts investigation
TOIG189	Office of Investigation, OIG	Notes	6/30/94			Voice mail to Kerner from Sherburne
ROIG3413	Office of Investigation Master File	E-Mail	6/30/94	Clark Blight	Frederick Gibson	Two "contacts" reported in press not relating to the MGSL / criminal referral issues
TOIG170	Francine Kerner Secretary	Phone Message	6/30/94	Robert Cesca	Jack Adair	Phone messages from Jack Adair dated 6/30/94 and 7/27/94
TOIG223	Francine Kerner	Fax, Letter	6/30/94	James Cottos	Francine Kerner	Letter si from Bentsen to Cesca re: investigation of WHS / Treasury contacts concerning MGSL. Letter faxed from Kerner to Cottos.
OGE2269	OGE	Statement	6/30/94		OIC	Statement that OIC has completed two separate investigations
TOIG102	Francine Kerner	Memo	7/1/94	James Cottos, cc: Raisa Cesario	Francine Kerner	Attempt to contact Nussbaum

Bates	Source	Type	Date	To / cc	From	Subject
TOIG208	Office of Investigation, OIG	Letter	7/1/94	Lloyd Cutler	John Adair, Robert Cesca	Investigation on ethics provisions relating to briefings or discussions concerning MGSL
ROIG100001	Dianne Rodgers	Phone Log	7/1/94			Phone logs for period 7/1/94 to 7/31/94 from telephone of Rodgers (station 87804) sorted chronologically (with annotations) -- telephone used by Kerner
ROIG3462	Patricia Black	Letter	7/1/94	Lloyd Cutler	John Adair, Robert Cesca	Request for interviews with WHS personnel who were involved in briefings or discussions
ROIG100011	Jo Ann King	Phone Log	7/1/94			Phone logs for period 7/1/94 to 7/31/94 from telephone of King (station 87800) sorted by number dialed (without annotations) -- telephone used by Kerner
TOIG224	Francine Kerner	Letter	7/1/94	Lloyd Cutler	John Adair, Robert Cesca	Investigation of ethics provisions relating to briefings or discussions concerning MGSL
TOIG214	Office of Investigation, OIG	Letter	7/1/94	Bernard Nussbaum	Robert Cesca	Inquiry into propriety of communications between Treasury employees and WHS staff, Requesting interview
ROIG100002	Dianne Rodgers	Phone Log	7/1/94			Phone logs for period 7/1/94 to 7/31/94 from telephone of Rodgers (station 87804) sorted chronologically (with annotations) -- telephone used by Kerner

Bates	Source	Type	Date	To / cc	From	Subject
ROIG100007	Jo Ann King	Phone Log	7/1/94			Phone logs for period 7/1/94 to 7/31/94 from telephone of King (station 87800) sorted by number dialed (with annotations) -- telephone used by Kerner
ROIG100009	Jo Ann King	Phone Log	7/1/94			Phone logs for period 7/1/94 to 7/31/94 from telephone of King (station 87800) sorted chronologically (without annotations) -- telephone used by Kerner
DOT10839	Asst. GC (Law and Ethics) -- Central Files	Letter	7/1/94	Lloyd Cutler	John Adair and Robert Cesca	Request for files
TOIG212	Office of Investigation, OIG	Letter	7/1/94	Lloyd Cutler	John Adair, Robert Cesca	Investigation of ethics violations relating to briefings or discussions concerning MGSL
ROIG3478	Patricia Black	Letter	7/1/94	Lloyd Cutler	John Adair, Robert Cesca	Request to have interviews with all WHS personnel who were involved in any discussions or briefings
ROIG100004	Dianne Rodgers	Phone Log	7/1/94			Phone logs for period 7/1/94 to 7/31/94 from telephone of Rodgers (station 87804) sorted by number dialed (without annotations) -- telephone used by Kerner
DOT10781	Asst. GC (Law and Ethics) -- Central Files	Letter	7/1/94	Alfonse D'Amato	Ed Knight	Response to D'Amato's 6/22/94 letter requesting information and documents

Bates	Source	Type	Date	To / cc	From	Subject
ROIG100003	Dianne Rodgers	Phone Log	7/1/94			Phone logs for period 7/1/94 to 7/31/94 from telephone of Rodgers (station 87804) sorted chronologically (without annotations) -- telephone used by Kerner
DOT11428	Kenneth Schmalzbach	Notes	7/1/94			Handwritten notes from notebook, "To Do" in top left corner, with reference to documents and WHS sensitive documents
ROIG100005	Jo Ann King	Phone Log	7/1/94			Phone logs for period 7/1/94 to 7/31/94 from telephone of King (station 87800) sorted chronologically (with annotations) -- telephone used by Kerner
TOIG111	Francine Kerner	Memo	7/5/94	James Cottos cc: Robert Cesca	Francine Kerner	Update on IG Inquiry
DOT10736	Asst. GC (Law and Ethics) -- Central Files	Notes	7/5/94			MGSL hearing preparation, check list
TOIG010	Robert Cesca	Letter	7/5/94	Lloyd Bentsen	Steven Potts	Response to 6/30/94 letter
TOIG036	Robert Cesca	Memo	7/5/94	Francine Kerner, cc: Robert Cesca, Raisa Cesario	James Cottos	Update on the IG Inquiry
TOIG175	Office of Investigation, OIG	Notes	7/5/94			Meeting at MT- Adair, Switzer, Black, Blight, Cesca, & Kerner

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3299	Blight -- Office of Investigation Master Files	Notes	7/5/94			Handwritten notes of 7/5/94 meeting with "Contact" underlined in top left corner
TOIG206	Office of Investigation, OIG	Memo	7/5/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Update on IG Inquiry.
TOIG035	Robert Cesca	Memo	7/5/94	James Cottos, cc: Robert Cesca, Raisa Cesario	Francine Kerner	Update on the IG Inquiry
DOT10989	Robert McNamara	To Do List	7/5/94			Handwritten notes of "to do" list mentioning transcripts
OGE2238	OGE	Telephone Log	7/5/94		Jane Ley	Ley Telephone log from 7/5/94 - 8/3/94
TOIG225	Francine Kerner	Letter	7/5/94	Lloyd Bentsen, cc: Robert Cesca, John Adair	Stephen Potts	Reponse to Bentsen's 6/30 letter concerning investigation
DOT10840	Asst. GC (Law and Ethics) -- Central Files	Letter	7/6/94	John Adair, Robert Cesca	Lloyd Cutler	Letter indicating that documents produced in response to Riegler and D'Amato's request for WHS / Treasury contacts information were sent over per request
TOIG209	Office of Investigations	Memo	7/6/94	Kenneth Schmalzbach, cc: Jim Cottos	Francine Kerner	Legal questions relating to IG inquiry
DOT10351	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			Interview of Stephen Katsanos
DOT07509	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			IG Interview of Roger Altman

Bates	Source	Type	Date	To / cc	From	Subject
TOIG192	Office of Investigation, OIG	Letter	7/6/94	Robert Cesca, John Adair	Lloyd Cutler	Copies of documents produced by WHS to SBC
ROIG3296	Blight -- Office of Investigation Master Files	Notes	7/6/94			Handwritten notes of meeting: "Patricia Black" on top of page
ROIG3414	Office of Investigation Master File	Fax, Letter	7/6/94	Patricia Black	Francine Kerner	Handwritten on fax " I've taken possession of WHS documents. Do we have the RTC documents". Attached is 7/6/94 memo from Kerner to Schmalzbach re: Legal questions relating to IG inquiry
DOT09932	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			Interview of William Roelle
DOT10991	Robert McNamara	To Do List	7/6/94			Mentions decision re: RTC documents
DOT10284	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			Interview of Stephen Katsanos
ROIG3150	RTC OIG	Deposition	7/6/94			Interview of William Roelle, with addendum to Interview
OGE0829	OGE	Deposition	7/6/94			IG Interview of Stephen Katsanos
DOT08459	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			IG Interview of Ellen Kulka, Ex # 40

Bates	Source	Type	Date	To / cc	From	Subject
DOT10238	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			Interview of Ellen Kulka
TOIG089	Francine Kerner	Letter	7/6/94	Robert Cesca, John Adair	Lloyd Cutler	Letter providing them with a copy of documents provided by the WHS to the SBC on 7/1/94
DOT08802	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			IG Interview of William Roelle, Ex # 47
OGE2181	Treasury	Letter	7/6/94	Kenneth Schmalzbach	Francine Kerner	Legal questions relating to IG inquiry
ROIG3460	Patricia Black	Letter	7/6/94	Robert Cesca, John Adair	Lloyd Cutler	Letter indicates that Cutler sent a copy of the documents produced by the WHS to SBC on 7/1/94 in response to 6/22/94 request from Riegler and D'Amato
DOT09120	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			Interview of Roger Altman
OGE1230	OGE	Deposition	7/6/94			IG Interview of William Roelle
DOT08355	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/6/94			IG Interview of Stephen Katsanos, Ex # 38
OGE0931	OGE	Deposition	7/6/94			IG Interview of Ellen Kulka
OGE1004	OGE	Deposition	7/6/94			IG Interview of Ellen Kulka

Bates	Source	Type	Date	To / cc	From	Subject
TOIG103	Francine Kerner	Memo	7/6/94	Francine Kerner, cc: Robert Cesca, Raisa Cesario	James Cottos	Update on IG Inquiry
TOIG104	Francine Kerner	Memo	7/6/94	Francine Kerner, cc: Robert Cesca, Raisa Cesario	James Cottos	Update on IG Inquiry
TOIG227	Francine Kerner	Letter	7/6/94	Robert Cesca, John Adair	Lloyd Cutler	Cover letter to copy of documents produced by WHS to SBC
ROIG3463	Patricia Black	Fax, Letter	7/6/94	John Adair, Patricia Black	Jane Ley	Fax with 7/5/94 letter to Bentsen from Potts, response to 6/6/94 Bentsen letter
DOT09088	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/7/94			Interview of Richard Aboussie
OGE0005	OGE	Deposition	7/7/94			IG Interview of Richard Aboussie
DOT10799	Asst. GC (Law and Ethics) -- Central Files	Memo	7/7/94	Robert Cesca	Ed Knight	Congressional requests for witness interview transcripts
DOT09329	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/7/94			Interview of James Dudine
DOT07722	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/7/94			IG Interview of James Dudine, Ex # 31
DOT07396	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/7/94			IG Interview of Richard Aboussie, Ex # 24

Bates	Source	Type	Date	To / cc	From	Subject
OGE0290	OGE	Deposition	7/7/94			IG Interview of James Dudine
DOT09988	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/8/94			Interview of Benjamin Nye
DOT10994	Robert McNamara	To Do List	7/8/94			Says "WHS wants to turn over Altman letter to Clinton" -- "Cutler wants to produce ?"
OGE2207	OGE	Letter	7/8/94	Robert Fiske	Stephen Potts	Letter requesting a meeting between Potts and Fiske
ROIG3004	RTC OIG	Deposition	7/8/94			Interview of Bernard Nussbaum
OGE1182	OGE	Deposition	7/8/94			IG Interview of Benjamin Nye
OGE1100	OGE	Deposition	7/8/94			IG Interview of Bernard Nussbaum
ROIG3086	RTC OIG	Deposition	7/8/94			Interview of Benjamin Nye
TOIG097	Francine Kerner	Memo	7/8/94	Raisa Cesario, cc: James Cottos	Francine Kerner	Update on witness interviews
TOIG110	Francine Kerner	Memo	7/8/94	James Cottos cc: Raisa Cesario	Francine Kerner	Sloan Interview
DOT09449	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/8/94			Interview of Dennis Foreman
DOT09269	CentralFiles	Deposition	7/8/94			Interview of Glion Curtis
DOT07602	Asst. GC (Law and Ethics) -- Central Files	Depositon	7/8/94			IG Interview of E. Glion Curtis, Ex #28

Bates	Source	Type	Date	To / cc	From	Subject
OGE0403	OGE	Deposition	7/8/94			IG Interview of Dennis Foreman
DOT07848	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/8/94			IG Interview of Dennis Foreman, Ex # 33
DOT08643	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/8/94			IG Interview of Bernard Nussbaum, Ex # 45
DOT08741	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/8/94			IG Interview of Benjamin Nye, Ex # 46
OGE0180	OGE	Deposition	7/8/94			IG Interview of E. Glion Curtis
DOT10035	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/8/94			Interview of Bernard Nussbaum
DOT10980	Kenneth Schmalzbach	To Do List	7/9/94			Typed "to do" list mentioning sharing transcripts with WHS
TOIG188	Office of Investigation, OIG	Memo	7/11/94	James Cottos, cc: Raisa Cesario	Francine Kerner	Steiner Questions
OGE0541	OGE	Deposition	7/11/94			IG Interview of Jean Hanson
DOT10995	Robert McNamara	To Do List	7/11/94			Mentions redaction of documents
DOT09655	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/11/94			Corrections to testimony of Jean Hanson from 7/11 & 7/15 transcripts
OGE0030	OGE	Deposition	7/11/94			IG Interview of Roger Altman

Bates	Source	Type	Date	To / cc	From	Subject
TOIG106	Francine Kerner	Memo	7/11/94	Francine Kerner, cc: Raisa Cesario	James Cottos	WHS Interviews
TOIG105	Francine Kerner	Memo	7/11/94	Francine Kerner, cc: Raisa Cesario	James Cottos	Whitewater Interviews
	Steve Switzer	Notes	7/11/94			
TOIG072	Robert Cesca	Calendar	7/11/94			Date book for July 11, 12, 13, 18, 19, 20, 28, 29, 30, 31, and August 18, 19, 20 and 21
DOT09174	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/11/94			Interview of Roger Altman
DOT08024	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/11/94			IG Interview of Jean Hanson, Ex # 35
DOT07429	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/11/94			IG Interview of Roger Altman, Ex # 25
DOT10484	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/11/94			Interview of Jean Hanson
DOT09314	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/12/94			Interview of Gary Davis
OGE224	OGE	Deposition	7/12/94			IG Interview of F. Gary Davis
DOT09752	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/12/94			Interview of Joshua Steiner

Bates	Source	Type	Date	To / cc	From	Subject
OGE1342	OGE	Deposition	7/12/94			IG Interview of Joshua Steiner
DOT07650	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/12/94			IG Interview of F. Gary Davis, Ex # 29
DOT08920	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/12/94			IG Interview of Joshua Steiner, Ex # 50
DOT08601	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			IG Interview of Beth Nolan, Ex # 44
DOT08862	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			IG Interview of Clifford Sloan, Ex # 48
OGE1286	OGE	Deposition	7/13/94			IG Interview of Clifford Sloan
DOT07565	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			IG Interview of John Bowman, Ex # 27
OGE1068	OGE	Deposition	7/13/94			IG Interview of Beth Nolan
OGE0901	OGE	Deposition	7/13/94			IG Interview of Stephen Katsanos
TOIG107	Francine Kerner	Memo	7/13/94	James Cottos cc: Raisa Cesario	Francine Kerner	Fred Coco conversation with Sherburne
DOT08427	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			IG Interview of Stephen Katsanos, Ex # 39

Bates	Source	Type	Date	To / cc	From	Subject
DOT09247	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			Interview of John Bowman
TOIG113	Francine Kerner	Memo	7/13/94	Robert Cesca	Francine Kerner	Phone call from WHS
ROIG3829	Steve Switzer	E-Mail	7/13/94	John Adair, Steve Switzer, Lew Sherman	Patricia Black	Spoke with Ley re: looking at transcripts
ROIG3412	Office of Investigation Master Files	E-Mail	7/13/94	John Adair, Steve Switzer, Lew Sherman	Patricia Black	Transcript - Jane Ley would like you to look at them
ROIG3411	Office of Investigation Master File	E-Mail	7/13/94	Patricia Black	Lew Sherman	Transcript distribution -- copies to Jane Ley
DOT10423	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			Corrections to Stephen Katsanos' 7/13 testimony
DOT10321	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			Interview of Stephen Katsanos
ROIG3209	RTC OIG	Deposition	7/13/94			Interview of Clifford Sloan
DOT10146	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			Interview of Beth Nolan
DOT09876	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/13/94			Interview of Clifford Sloan
OGE0158	OGE	Deposition	7/13/94			IG Interview of John Bowman

Bates	Source	Type	Date	To / cc	From	Subject
TOIG114	Francine Kerner	Memo	7/14/94	James Cottos cc: Raisa Cesario	Francine Kerner	Fred Coco conversation with Sherburne
TOIG117	Francine Kerner	Memo	7/14/94	Francine Kerner	James Cottos	Read receipt for Fred Coco conversation with Sherburne
OGE0977	OGE	Deposition	7/14/94			IG Interview of Bruce Lindsey
OGE1851	OGE	Letter	7/14/94	Stephen Potts	John Kenney	Restating conversation that would allow for Altman to make a written or oral presentation re: OGE's WHS / Treasury contacts investigation
TOIG109	Francine Kerner	Memo	7/14/94	James Cottos cc: Raisa Cesario	Francine Kerner	Ickes Interview
DOT08506	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/14/94			IG Interview of Bruce Lindsey, Ex # 41
DOT10210	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/14/94			Interview of Bruce Lindsey
ROIG3830	Steve Switzer	Fax	7/14/94	Steve Switzer	Jane Ley	Typed letter with underlined Hanson and Altman sections
DOT09712	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			Interview of Maggie Williams
DOT09731	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			Interview of George Stephanopoulos
OGE0239	OGE	Deposition	7/15/94			IG Interview of Jack DeVore

Bates	Source	Type	Date	To / cc	From	Subject
OGE0345	OGE	Deposition	7/15/94			IG Interview of Neil Eggleston
DOT10437	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			Interview of Harold Ickes
OGE0730	OGE	Deposition	7/15/94			IG Interview of Jean Hanson
OGE2120	RTC	Letter	7/15/94	Jane Ley	Steve Switzer	Materials re: RTC employees maintaining confidentiality of RTC records
DOT09387	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			Interview of Neil Eggleston
DOT08286	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			IG Interview of Harold Ickes, Ex # 37
OGE0792	OGE	Deposition	7/15/94			IG Interview of Harold Ickes
DOT08213	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			IG Interview of Jean Hanson, Ex # 36
DOT07782	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			IG Interview of Neil Eggleston, Ex # 32
DOT07668	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			IG Interview of Jack DeVore, Ex # 30

Bates	Source	Type	Date	To / cc	From	Subject
OGE2205	OGE	Letter	7/15/94	Lloyd Bentsen	Stephen Potts	Letter in response to a 6/30/94 Treasury letter stating that the administrative investigation may not be completed by the time Congress begins its hearings
DOT09660	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			Interview of Jack DeVore
OGE1440	OGE	Deposition	7/15/94			IG Interview of George Stephanopoulos
OGE1459	OGE	Deposition	7/15/94			IG Interview of Maggie Williams
DOT09067	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/15/94			IG Interview of Maggie Williams, Ex # 51
ROIG3482	Steve Switzer	Fax, Letter	7/15/94	Jane Ley	Steve Switzer	"Material concerning RTC employees maintaining the confidentiality of records" -- handwritten on fax & attached is memo from Tibola to Kuhnsman re: need for employees to maintain confidentiality of RTC business, attached various memos, etc. re: confidentiality
ROIG3320	Office of Investigation Master Files	Chronology	7/15/94			Draft of chronological list of WHS / Treasury contacts
OGE0523	OGE	Deposition	7/16/94			IG Interview of Mark Gearan

Bates	Source	Type	Date	To / cc	From	Subject
DOT08000	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/16/94			IG Interview of Mark Gearan, Ex # 34
DOT09567	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/16/94			Interview of Mark Gearan
TOIG115	Francine Kerner	Memo	7/18/94	James Cottos cc: Raisa Cesario, Robert Cesca	Francine Kerner	McLarty Interview / WHS
OGE2234	OGE	Calendar	7/18/94		Leslie Wilcox	Pages from Wilcox calendar from 7/18/94 - 8/5/94
TOIG093	Francine Kerner	Memo	7/18/94	James Cottos, cc: Raisa Cesario, Robert Cesca	Francine Kerner	Delivery of Transcripts
OGE0103	OGE	Deposition	7/18/94			IG Interview of Roger Altman
DOT11035	Annabella Mejia	Calendar	7/18/94			Daily calander beginning on 7/18/94
OGE1882	OGE	Letter	7/18/94	Stephen Potts	Reid Weingarten	Letter from Steiner's lawyer stating that he has fully cooperated with the investigation and will continue to do so if necessary
DOT10187	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/19/94			Interview of Thomas McLarty
ROIG3268	Office of Investigation Master File	Memo	7/19/94	Stephen Katsanos	Lew Sherman	Deposition Transcript

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3422	Office of Investigation Master File	Memo	7/19/94	William Roelle	Lew Sherman	Deposition Transcription
DOT11033	Annabella Mejia	Daily Activity Report	7/19/94			Activity report for Bentsen -- time, telephone, and activity headings
OGE1045	OGE	Deposition	7/19/94			IG Interview of Thomas McLarty
TOIG185	Office of Investigation, OIG	Memo	7/19/94	Francine Kerner, cc: Raisa Cesario	James Cottos	WHS Transcripts
OGE1954	Kenneth Schmalzbach	Memo	7/19/94	Francine Kerner	Francine Kerner	Draft legal questions re: OIG inquiry with attachments
OGE2186	Treasury	Memo	7/19/94	Francine Kerner	Kenneth Schmalzbach	Legal questions relating to IG Inquiry
TOIG094	Francine Kerner	Memo	7/19/94	Francine Kerner, cc: Raisa Cesario	James Cottos	WHS Transcripts
TOIG116	Francine Kerner	Memo	7/19/94	Francine Kerner cc: Raisa Cesario	James Cottos	WHS Transcripts
DOT08570	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/19/94			IG Interview of Thomas McLarty, Ex # 43
DOT08275	Asst. GC (Law and Ethics) -- Central Files	Affidavit	7/20/94	Francine Kerner	Harvey Pitt, Jean Hanson	Affidavit of Hanson re: WHS / Treasury contacts re: MGSL
OGE1757	OGE	Deposition Corrections	7/20/94	Tina Bak-Brevik	Stanley Brand	Corrections made to Stephanopoulos Deposition

Bates	Source	Type	Date	To / cc	From	Subject
OGE1677	OGE	Deposition Corrections	7/20/94	Francine Kerner	Lawrence Pedowitz	Corrections made to Nussbaum Deposition
OGE1667	OGE	Deposition Corrections	7/20/94	Jane Ley	Francine Kerner	Corrections made to 7/13/94 Nolan Deposition
ROIG3613	RTC OIG	Letter	7/20/94	Francine Kerner	Lawrence Pedowitz	Corrections to Nussbaum interview
OGE2184	Treasury	Memo of Interview	7/20/94			Memo of 7/19/94 Bentsen interview
DOT10178	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/20/94	Tina Bak-Brevik	Randall Turk	Corrections to Beth Nolan's testimony
ROIG3659	RTC OIG	Fax	7/20/94	Patricia Black	Francine Kerner	Corrections to Bowman interview
ROIG3557	RTC OIG	Letter	7/20/94	Francine Kerner	Justin Simon	Corrections to Gearan Interview
ROIG3648	RTC OIG	Letter	7/20/94	Tina Bak-Brevik	Stanley Brand	Corrections to Stephanopoulos interview
OGE1492	OGE	Deposition Corrections	7/20/94	Jane Ley	Francine Kerner	Corrections made to 7/13/94 Bowman Deposition
OGE1483	OGE	Fax Cover Sheet	7/20/94	Francine Kerner	Paul Curmin	Note that in Altman's tesimony the reference to July 6, 1994 refers to Altman's diary
DOT09650	Asst. GC (Law and Ethics) -- Central Files	Letter, Affidavit	7/20/94	Francine Kerner	Harvey Pitt	Affidavit of Jean Hanson re: IG inquiry
DOT10117	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/20/94	Francine Kerner	Bernard Nussbaum	Nussbaum's corrections of his testimony

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3769	RTC OIG	Letter	7/21/94	File		Changes to the Steiner interview
ROIG3752	RTC OIG	Letter	7/21/94	File		Changes to the Nye interview
ROIG3575	RTC OIG	Letter	7/21/94	Francine Kerner	Bruce Lindsey	Corrections to Lindsey Interview
ROIG3603	RTC OIG	Fax, Letter	7/21/94	Francine Kerner	Patricia Black	Fax with letter to Tina Bak-Brevik from Randall Turk with changes to Beth Nolan interview
OGE2250	OGE	Notes	7/21/94		Stephen Potts	Note from a telephone conversation between Potts and Cutler
ROIG3646	RTC OIG	Letter	7/21/94	Francine Kerner	Peter Romatowski	Corrections to Sloan interview
ROIG3555	RTC OIG	Letter	7/21/94	Francine Kerner	William Murphy	Corrections to Eggleston Interview
ROIG3681	RTC OIG	Letter	7/21/94	Francine Kerner	Robert Bauer	Changes to DeVore interview
ROIG3682	RTC OIG	Letter	7/21/94		Dennis Foreman	Declaration of Dennis Foreman, and corrections to the Foreman interview
DOT11034	Annabella Mejia	Daily Activity Report	7/21/94			Daily activity report for Bentsen
OGE1564	OGE	Affidavit	7/21/94	Jane Ley	Francine Kerner	Affidavit of Jean Hanson and Corrections to her 7/11/94 and 7/15/94 Depositions
TOIG082	Robert Cesca Secretary	Calendar	7/21/94			Appointment book for 6/21/94 - 6/30/94
ROIG2976	RTC OIG	Deposition	7/21/94	Francine Kerner	Bruce Lindsey	Letter to Kerner from Lindsey and a copy of Lindsey's interview (Bates Nos. 2976-3003)

Bates	Source	Type	Date	To / cc	From	Subject
OGE1532	OGE	Deposition to File	7/21/94	File	Francine Kerner	Corrections made to 7/8/94 Foreman Deposition
OGE1639	OGE	Deposition Corrections	7/21/94	Francine Kerner	Bruce Lindsey	Corrections made to 7/14/94 Lindsey Deposition
OGE1708	OGE	Deposition Corrections	7/21/94	File	Francine Kerner	Corrections made to 7/8/94 Nye Deposition
OGE1728	OGE	Deposition Corrections	7/21/94	Jane Ley	Francine Kerner	Corrections to 7/13/94 Sloan Deposition
OGE1730	OGE	Deposition Corrections	7/21/94	File	Francine Kerner	Corrections made to 7/12/94 Steiner Deposition
OGE1761	OGE	Draft Statement	7/21/94	Francine Kerner, Jane Ley	Lawrence Pedowitz	Draft of statement being prepared by Nussbaum in connection with the Congressional hearings
DOT09849	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/21/94			Corrections to Joshua Steiner testimony
OGE2285	OGE	Calendar	7/22/94		Lloyd Bentsen	Redacted calendar for February
DOT10960	Bernetta Smith	Phone Message	7/22/94		Jane Sherburne	Phone message indicating Sherburne called 7/22 at 5:36 pm
ROIG3290	Office of Investigation Master Files	Letter	7/22/94	Robert Cesca	Alfonse D'Amato, Donald Riegle	7/22/94 Letter stating the DOT had not completely complied with SBC document production request, copy of this letter is faxed from Bob Cesca to Jack Adair

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3323	Office of Investigation Master Files	Memo	7/22/94	Francine Kerner	Kenneth Schmalzbach	Legal Questions Relating to OIG Inquiry
DOT10961	Bernetta Smith	Phone Message	7/22/94		Jane Sherburne	Phone message most likely to Bernetta Smith -- produced by her office.
OGE1515	OGE	Memo with Deposition Corrections	7/22/94	Lew Sherman	E. Glion Curtis	Corrections made to 7/8/94 Curtis Deposition
ROIG3652	RTC OIG	Fax, Letter	7/22/94	Patricia Black	Francine Kerner	Fax with letter Francine Kerner from Paul Curnin with corrections for Altman interview
DOT10943	Asst. GC (Law and Ethics) -- Central Files	Memo	7/22/94	Lew Sherman	E. Glion Curtis	Changes to Curtis statement
OGE1783	OGE	Submission	7/22/94	Jane Ley	Matt Murley, Jean Hanson	Submission on behalf of Hanson in connection with Treasury IG and RTC IG Case No. 94-1-031-1
OGE2303	OGE	Letter	7/22/94	Robert Cesca	Alfonse D'Amato	Asks for assistance from IG regarding obtaining certain Treasury documents
OGE2145	RTC	Memo	7/22/94	Patricia Black	Ellen Kulka	Legal questions relating to OIG inquiry
OGE1883	OGE	Letter with Draft Report	7/22/94	Stephen Potts	John Adair, Robert Cesca	Draft Investigation Report requested by Bentsen re: RTC / WHS / Treasury contacts
DOT10962	Kenneth Schmalzbach	Notes	7/23/94			Handwritten notes relating to transcripts

Bates	Source	Type	Date	To / cc	From	Subject
TOIG092	Francine Kerner	Letter	7/23/94	Jane Sherburne	Stephen McHale	Enclosed copies of transcripts of interviews but McLarty made by Treasury IG
ROIG3559	RTC OIG	Letter	7/23/94	Jane Ley	Amy Sabrin	Corrections to Ickes Interview
ROIG3410	Office of Investigation Master File	Letter	7/23/94	Jane Sherburne	Stephen McHale	Response to request for transcripts
OGE1852	OGE	Statement	7/23/94	OGE	Simpson Thacher & Bartlet for Altman	Altman statement to OGE re: WHS / Treasury contacts concerning MGSL
DOT10842	Asst. GC (Law and Ethics) -- Central Files	Letter	7/23/94	Jane Sherburne	Stephen McHale	Letter indicating that all IG interview transcripts, except McLarty's, were sent to WHS
DOT10798	Asst. GC (Law and Ethics) -- Central Files	Letter	7/23/94	Jane Sherburne	Stephen McHale	Letter indicating all transcripts of interviews conducted by IG sent to WHS, except for McLarty
OGE1577	OGE	Deposition Corrections	7/23/94	Jane Ley	Amy Sabrin	Corrections made to Ickes Deposition
ROIG3552	John Adair	Letter	7/23/94	Jane Sherburne	Stephen McHale	Letter stating that enclosed are all the transcripts except McLarty's of interviews conducted by the Treasury IG
ROIG3471	Patricia Black	Letter	7/23/94	Jane Sherburne	Stephen McHale	Letter stating that enclosed with letter are the transcripts of all but McLarty's interview that the Treasury IG conducted
TOIG229	Francine Kerner	Letter	7/23/94	Jane Sherburne	Stephen McHale	Copies of transcripts

Bates	Source	Type	Date	To / cc	From	Subject
DOT10767	Asst. GC (Law and Ethics) -- Central Files	Letter	7/23/94	Jane Sherburne	Stephen McHale	Letter indicating that enclosed copies of all transcripts, but McLarty's, conducted by Treasury IG as part of WHS / Treasury contacts investigation
DOT10958	Stephen McHale	Computer Printout	7/23/94			File list - c:\data\wp\madison\summaries*. *, list of names with lines and checkmarks next to each
DOT10474	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/23/94	Jane Ley	Amy Sabrin	Corrections to Harold Ickes' testimony
TOIG186	Office of Investigation, OIG	Letter	7/23/94	Jane Sherburne	Stephen McHale	Copies of transcripts
OGE1817	OGE	Submission	7/24/94	Jane Ley	Matt Murley. Jean Hanson	Submission on behalf of Hanson in connection with Treasury IG and RTC IG Case re: WHS / Treasury contacts (Original)
ROIG3418	Office of Investigation Master File	Fax	7/25/94	Clark Blight	James Cottos	Handwritten on fax, "Questions and suggested changes to our report by the Bentsen "review team" - to be discussed tomorrow," attached are changes to chronology (?)
TOIG171	Office of Investigation, OIG	Notes	7/25/94			Copies of transcript given to Cutler
DOT11027	Annabella Mejia	Calendar	7/25/94			Daily calendar starting on 7/25/94

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3322	Office of Investigation Master Files	Fax Cover Sheet	7/25/94	Patricia Black	Francine Kerner	Fax cover sheet indicating that Kerner sent Black a copy of the 7/22/94 Memo from Schmalzbach to Kerner
TOIG077	Robert Cesca Secretary	Phone Messages	7/25/94	Francine Kerner	Various	Phone Messages for 7/25/94 - 8/30/94
DOT11021	Annabella Mejia	Notes	7/25/94			Handwritten notes with time, telephone, and activity heading for Bentsen
DOT11029	Annabella Mejia	Calendar	7/25/94			Revision for 9:30 am meeting with Knight
DOT10959	Stephen McHale	Calendar	7/25/94			Calendar pages for week of 7/25/94
OGE2200	Treasury	Letter	7/26/94	Jane Ley	Dennis Foreman	Foreman provides a brief legal analysis re: WHS / Treasury contacts re: MGSL
ROIG3459	Patricia Black	E-Mail	7/26/94	Stephen Katsanos, cc: Steve Switzer	John Adair	Transcripts of each interview were given only to the witness for correction
TOIG012	Robert Cesca	Testimony	7/26/94			Attachment to testimony of Lloyd Cutler before HBC, Chronology of Contacts
OGE1527	OGE	Memo with Deposition Corrections	7/26/94	Joan Dwyer	James Dudine	Corrections made to 7/7/94 Dudine Deposition
DOT09385	Asst. GC (Law and Ethics) -- Central Files	Memo	7/26/94	Joan Dwyer	James Dudine	Corrections to Interview transcript

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3292	Blight -- Office of Investigation Master File	Notes	7/26/94			Notes from 7/25/94 meeting, Treasury meeting at RTC
OGE2208	OGE	Letter	7/26/94	Francine Kerner, Patricia Black	Jane Ley	Comments on the draft chronology
DOT11030	Annabella Mejia	Calendar	7/26/94			Revision for 11:30 am meeting with Knight and 1:30 pm meeting with Knight
ROIG3508	Steve Switzer	E-Mail	7/26/94	Stephen Katsanos cc: Steve Switzer	John Adair	Only the persons interviewed were given copies of their transcripts in order to correct them
ROIG3541	John Adair	E-Mail	7/26/94	John Adair, Steve Switzer	Stephen Katsanos	Katsanos makes comment about Cutler at the hearing, which he is watching at the time he writes the E-mail, stating that the WHS had an opportunity to review the transcripts
ROIG3518	Steve Switzer	Chronology	7/26/94	Francine Kerner, Patricia Black	Jane Ley	Comment on the chronology from reading the transcripts
ROIG3540	John Adair	E-Mail	7/26/94	Stephen Katsanos, Steve Switzer	John Adair	Stating that his office only gave copies of transcripts to the witnesses interviewed to correct them

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3539	John Adair	E-Mail	7/26/94	John Adair	Stephen Katsanos	Questions that may come up on the propriety of this sharing will be directed to Treasury, then a handwritten note saying Adair called Katsanos to say he did not know in advance that questions on this matter should be referred to Treasury
OGE1484	OGE	Depoition Corrections	7/27/94	Francine Kerner	Paul Curmin	Corrections made to 7/11/94 Altman Deposition
OGE2278	OGE	Notes	7/27/94	Jane Ley	Patricia Black	Handwritten notes
ROIG3458	Patricia Black	E-Mail	7/27/94	Steve Switzer	Patricia Black	7/26/94 meeting recap, report deadline, and learn that OGC had released Cutler transcripts of witness interviews
OGE2274	OGE	Fax	7/27/94	Jane Ley	Patricia Black	Excerpt re: Litigation Delegations of Authority
OGE1003	OGE	Fax Cover Sheet	7/27/94	Jane Ley	Francine Kerner	Fax cover sheet indicating Kerner sent Ley the 7/06/94 Kulka deposition
OGE1529	OGE	Memo with Deposition Corrections	7/27/94	Jane Ley	Francine Kerner	Corrections made to Eggleston Deposition
ROIG3553	John Adair	Memo	7/27/94	Robert Cesca	Ed Knight	Congressional Staff Request for Witness Interview Transcripts
DOT08548	Asst. GC (Law and Ethics) -- Central Files	Deposition	7/27/94			IG Interview of Eugene Ludwig, Ex # 42

Bates	Source	Type	Date	To / cc	From	Subject
OGE2212	OGE	Chronology	7/27/94			Draft chronology of WHS / Treasury contacts
ROIG3509	Steve Switzer	E-Mail	7/27/94	Steve Switzer	Patricia Black	Recap of 7/26/94 meeting, learned at meeting that Treasury OGE had released transcripts of witnesses to Cutler
ROIG3481	Steve Switzer	E-Mail	7/27/94	Clark Blight	Steve Switzer	Comments on the report
OGE1725	OGE	Memo with Deposition Corrections	7/27/94	File	Joan Dwyer	Corrections made to 7/6/94 Roelle Deposition
OGE1777	OGE	Letter	7/27/94	Jane Ley	Robert Bauer	Letter statement regarding DeVore's cooperation efforts with regard to OGE inquiry
OGE2231	OGE	Summary	7/27/94	Patricia Black	Jane Ley, Leslie Wilcox	Draft executive summary with OGE suggested changes and comments from Ley and Wilcox
OGE1026	OGE	Deposition	7/27/94			IG Interview of Eugene Ludwig
DOT10939	Asst. GC (Law and Ethics) -- Central Files	Memo	7/27/94	File	Joan Dwyer	Addendum to Roelle testimony
DOT10987	Robert McNamara	Tasking List	7/27/94			Tasking list with who, what, and status headings - mentions IG and RTC transcripts
DOT10988	Robert McNamara	To Do List	7/27/94			Mentions Transcripts
DOT11031	Annabella Mejia	Calendar	7/27/94			Revision for 10:00 am meeting with Pat Griffin

Bates	Source	Type	Date	To / cc	From	Subject
OGE1759	OGE	Deposition Corrections	7/28/94	Sharon Separ	Ed Dennis	Corrections made to 7/15/94 Williams Deposition
ROIG3649	RTC OIG	Fax	7/28/94	Francine Kerner	Bob Serino	Corrections to Ludwig interview
ROIG3650	RTC OIG	Letter	7/28/94	Sharon Separ	Ed Dennis	Corrections to Williams interview
OGE2252	OGE	Notes	7/28/94		Stephen Potts	Notes from a telephone conversation between Potts and Knight
OGE2151	RTC	Chronology	7/28/94	Jane Ley		Draft chronology of WHS/Treasury contacts
RTC260	Kevyn Orr	Notes	7/28/94			Handwritten notes with information about transcripts
DOT11124	Asst. GC (Law and Ethics) -- Central Files	Memo	7/28/94	Ed Knight	Kenneth Schmalzbach	Ryan and Adair telephone calls
OGE1588	OGE	Deposition Corrections	7/28/94			Corrections made to 7/6/94 Katsanos Deposition
OGE1478	OGE	Deposition Corrections	7/28/94			Corrections made to 7/7/94 Richard Aboussie Deposition
OGE1025	OGE	Fax Cover Sheet	7/28/94	Jane Ley	Dan O'Rourke, Francine Kerner	Fax cover sheet indicating O'Rourke and Kerner sent Ley the Ludwig 7/27/94 deposition
ROIG0001	RTC OIG	Report	7/29/94	Lloyd Bentsen	John Adair, Robert Cesca	Final Report of Investigation with Depositions -- Volume 1 (Bates Nos. 0001-0160)

Bates	Source	Type	Date	To / cc	From	Subject
ROIG0161	RTC OIG	Report	7/29/94	Lloyd Bentsen	John Adair, Robert Cesca	Final Report of Investigation with Depositions -- Volume 2 (Bates Nos. 0161-0808)
ROIG0809	RTC OIG	Report	7/29/94	Lloyd Bentsen	John Adair, Robert Cesca	Final Report of Investigation with Depositions -- Volume 3 (Bates Nos. 0809-1393)
DOT10902	Asst. GC (Law and Ethics) -- Central Files	Letter	7/29/94	Lloyd Bentsen	John Adair, Robert Cesca	Letter with attached OGE report in response to 3/3/94 Bentsen request for investigation into WHS / Treasury contacts
DOT11089	Peter Rittling	Memo	7/29/94	Kenneth Schmalzbach	Peter Rittling	Review of the IG's final chronology of WHS / Treasury contacts
DOT11032	Annabella Mejia	Calendar	7/29/94			Revision for 12:30 Lunch with Leon Panetta
ROIG1394	RTC OIG	Report	7/29/94	Lloyd Bentsen	John Adair, Robert Cesca	Final Report of Investigation with Depositions -- Volume 4 (Bates Nos. 1394-1960)
OGE2280	OGE	Notes	7/29/94	Jane Ley	James Cottos	Handwritten note with Altman's name and info re: referrals in it
TOIG026	Robert Cesca	Letter	7/29/94	Robert Cesca	Frank Wolf	Letter addressing issue that they gave transcripts over to Cutler at Bentsen's request
ROIG0001	RTC OIG	Report	7/29/94			Final Report of Investigation, Vol. 1

Bates	Source	Type	Date	To / cc	From	Subject
TOIG078	Robert Cesca Secretary	Phone Message	7/29/94	Francine Kerner	Jane Sherburne	Message "We object to the release of any deposition transcripts, & before they're released we request an opportunity to be heard."
TOIG170	Francine Kerner Secretary	Phone Message	7/29/94	Francine Kerner	Patricia Black	Phone message: "right away!"
DOT10805	Asst. GC (Law and Ethics) -- Central Files	Letter	7/29/94	Lloyd Bentsen	John Adair, Robert Cesca	Response to 3/3/94 letter with enclosed report re: WHS / Treasury contacts investigation
TOIG0009	Robert Cesca	Letter	7/31/94	Henry Gonzalez	Lloyd Bentsen	Letter had OGE report attached and addressed issue of request for unredacted copies of transcripts
DOT10999	David Hamill	Letter	7/31/94	Donald Riegle	Lloyd Bentsen	Letter stating Bentsen received and read OGE report
TOIG0006	Robert Cesca	Letter	7/31/94	Alfonse D'Amato	Lloyd Bentsen	Letter had OGE report attached and also addressed issue of giving out the unredacted copies of transcripts
DOT11014	Departmental Executive Secretariat	Letter	7/31/94	Henry Gonzalez	Lloyd Bentsen	Letter saying Bentsen read OGE report and is including a copy
TOIG0008	Robert Cesca	Letter	7/31/94	James Leach	Lloyd Bentsen	Letter had the OGE report attached to it and addressed the issue of the request for unredacted copies of transcripts
TOIG006	Robert Cesca	Letter	7/31/94	Alfonse D'Amato	Lloyd Bentsen	Re: copy of OGE Report

Bates	Source	Type	Date	To / cc	From	Subject
DOT11018	Departmental Executive Secretariat	Statement	7/31/94		Lloyd Bentsen	Bentsen Statement
ROIG3443	Patricia Black	Letter	7/31/94	Robert Cesca	Donald Riegler	Request for SBC to receive a copy of the unredacted copy of documents from the OGE Report
DOT11017	Departmental Executive Secretariat	Letter	7/31/94	Alfonse D'Amato	Lloyd Bentsen	Letter saying Bentsen read OGE report and is including a copy
DOT11016	Departmental Executive Secreratiat	Letter	7/31/94	Donald Riegler	Lloyd Bentsen	Letter saying Bentsen read OGE report and is including a copy
DOT11015	Departmental Executive Secretariat	Letter	7/31/94	James Leach	Lloyd Bentsen	Letter saying Bentsen read OGE report and is including a copy
TOIG0007	Robert Cesca	Letter	7/31/94	Donald Riegler	Lloyd Bentsen	Letter had copy of OGE report attached and addressed the issue of request for unredacted copies of transcripts
ROIG3444	Patricia Black	Letter	8/1/94	Jack Adair	Henry Gonzalez	Request for unredacted copies of the depositions from OGE report
TOIG028	Robert Cesca	Letter	8/1/94	Robert Cesca	Henry Gonzalez	Request for assistance with the Committee's contacts investigation
ROIG3796	Adair Secretary	Letter	8/1/94	John Adair	Henry Gonzalez	Requests assistance with the Banking investigation, would like copies of unredacted depositions

Bates	Source	Type	Date	To / cc	From	Subject
OGE1779	OGE	Letter	8/1/94	Stephen Potts, Jane Ley	Robert Bauer	Request for clarification of discussion regarding DeVore in report to Benson relating to WHS/Treasury contacts
ROIG	John Adair	Letter	8/1/94	John Adair	Stephen Potts	Letter stating that enclosed is a copy of the analysis they provided to Bentsen on 7/30/94
ROIG3797	Adair Secretary	Letter	8/1/94	John Adair, Robert Cesca	Harvey Pitt	IG WHS / Treasury contacts, on behalf of Jean Hanson
ROIG3798	Adair Secretary	Letter	8/1/94	John Adair	Stephen Potts	Letter enclosing a copy of the OGE report sent to Bentsen on 7/30/94
ROIG3400	Office of Investigation Master Files	Letter	8/1/94	Robert Cesca, John Adair	Harvey Pitt	IG WHS / Treasury Contacts Inquiry
ROIG3826	Steve Switzer	E-Mail	8/2/94	Ellen Kulka, cc: Tomback, Adair, Switzer	Patricia Black	Congressional Requests
RTC259	Patricia Black	E-Mail	8/2/94	Ellen Kulka, cc: Andrew Tomback, John Adair	Patricia Black	Congressional Requests
TOIG079	Robert Cesca Secretary	Phone Message	8/2/94	Francine Kerner	Jane Sherburne	Message re: sending a letter to Riegle re: the IG inquiry
DOT11120	Asst. GC (Law and Ethics) -- Central Files	Questions	8/2/94	Ed Knight	Kenneth Schmalzbach	Tough Questions, Transcript Questions
DOT10768	Asst. GC (Law and Ethics) -- Central Files	Letter	8/3/94	Donald Riegle	Lloyd Cutler	Letter stating Cutler proceeded properly when making request for the transcripts on 7/23/94

Bates	Source	Type	Date	To / cc	From	Subject
DOT10708	Asst. GC (Law and Ethics) -- Central Files	Letter	8/3/94	Donald Riegler	Lloyd Bentsen	Letter asking for additional cooperation with requests for information
TOIG079	Robert Cesca Secretary	Phone Message	8/3/94	Francine Kerner	Jane Sherburne	Re: McHale instead. (parts not legible due to copy)
ROIG3441	Patricia Black	Letter	8/3/94	Donald Riegler	John Adair	Response to 7/31/94 letter
TOIG023	Robert Cesca	Letter	8/3/94	Donald Riegler	Lloyd Cutler	Hearings on WHS / Treasury contacts
TOIG239	Francine Kerner	Letter	8/3/94	Donald Riegler	Lloyd Cutler	WHS / Treasury Contacts
ROIG3466	Patricia Black	Fax, Letter	8/3/94	Jane Sherburne	Patricia Black	Fax with 8/3/94 letter to Riegler from Bentsen with handwritten corrections on it
TOIG230	Francine Kerner	Letter	8/3/94	Frank Wolf	John Adair, Robert Cesca	Letter re: Wolf concern for need to interview Jean Lewis and April Breslaw
TOIG0004	Robert Cesca	Letter	8/3/94	Henry Gonzalez	John Adair	Response to the 8/1/94 letter requesting unredacted copied of transcripts
ROIG3457	Patricia Black	E-Mail	8/3/94	John Adair, cc: Clark Blight	Patricia Black	Patricia Black received a phone call from Kerner to tell Black Cutler was about to send letter regarding transcripts
DOT11125	Asst. GC (Law and Ethics) -- Central Files	Letter	8/3/94	Donald Riegler	Lloyd Cutler	Letter re: IG interview transcripts

Bates	Source	Type	Date	To / cc	From	Subject
DOT11127	Asst. GC (Law and Ethics) -- Central Files	Fax, Statement	8/3/94	Stephen McHale	Jane Sherburne	Fax with attached Statement on access to IG transcripts by witnesses, and Statement on access to depositions by WHS counsel
ROIG3827	Steve Switzer	E-Mail	8/3/94	John Adair, Steve Switzer, Clark Blight	Patricia Black	Transcripts / WHS letter revision
ROIG3833	Steve Switzer	E-Mail	8/3/94	John Adair, Steve Switzer, Clark Blight	Patricia Black	Transcripts / WHS letter
ROIG3439	Patricia Black	Letter	8/3/94	Henry Gonzalez	John Adair	Response to 8/8/94 Gonzalez letter
ROIG3469	Patricia Black	Letter	8/3/94	Donald Riegler	Lloyd Bentsen	Letter addressing issues brought up at hearings on 8/2/94 about access to information
ROIG3308	Office of Investigation Master Files	Fax, Letter	8/3/94	Jane Sherburne	Patricia Black	Fax with 8/3/94 letter to Donald Riegler with handwritten comments
DOT10985	David Dougherty	Chronology	8/3/94			Chronology re: sharing IG transcripts with WHS
DOT10834	Asst. GC (Law and Ethics) -- Central Files	Letter	8/3/94	Donald Riegler	John Adair	Response to 8/3/94 letter requesting unredacted copies of transcripts
DOT10832	Asst. GC (Law and Ethics) -- Central Files	Letter	8/3/94	Henry Gonzalez	John Adair	Response to 8/1/94 letter requesting unredacted copies of transcripts
ROIG3545	John Adair	Fax, Letter	8/3/94	Jane Sherburne	Patricia Black	Fax with 8/3/94 letter to Riegler with handwritten comments on it

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3543	John Adair	Leter	8/3/94	Donald Riegler	Lloyd Cutler	Questions about propriety and access to transcripts raised by Senator Bond at the hearings on 8/2/93
ROIG3548	John Adair	Fax, Letter	8/3/94	Patricia Black	Francine Kerner	Fax cover sheet with another fax cover sheet from Sherburne to Kerner with attached 8/3/94 letter to Riegler with additional handwritten comments
ROIG3396	Office of Investigation Master Files	Fax	8/3/94	Jane Sherburne	Patricia Black	Fax with attached 8/3/94 letter (with handwritten changes) to Riegler from Cutler
ROIG3399	Office of Investigation Master File	E-Mail	8/3/94	John Adair, Clark Blight	Patricia Black	Transcripts / WHS letter
ROIG3510	Steve Switzer	E-Mail	8/3/94	John Adair cc: Steve Switzer, Clark Blight	Patricia Black	Transcripts / WHS letter
ROIG3405	Office of Investigation Master File	Letter	8/3/94	Donald Riegler	John Adair	Response to 7/31/94 letter requesting unredacted copies of transcripts
DOT10706	Asst. GC (Law and Ethics) -- Central Files	Letter	8/3/94	Donald Riegler	Lloyd Cutler	Letter asking for additional cooperation with request of information
ROIG3407	Office of Investigation Master File	Letter	8/3/94	Henry Gonzalez	John Adair	Response to 8/1/94 letter requesting unredacted copies of transcripts

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3401	Office of Investigation Master File	Fax	8/4/94	Patricia Black	Francine Kerner	"for your info", attached is 8/4/94 fax cover sheet to Francine Kerner from Jane Sherburne with attached 8/3/94 letter to Riegle from Cutler
TOIG191	Office of Investigation, OIG	Timeline	8/4/94			Timeline on access to transcripts from 7/1-7/30.
TOIG079	Robert Cesca Secretary	Phone Message	8/8/94	Francine Kerner	Jane Sherburne	Re: review of Friday's transcripts before responding to her
ROIG3354	Office of Investigation Master Files	Letter	8/11/94	Robert Cesca, John Adair	Matt Murley	Re: IG WHS / Treasury Contacts Inquiry, corrections from Murley to the chronology
ROIG3393	Office of Investigation Master Files	Letter	8/15/94	Robert Cesca, John Adair	Matt Murley	IG WHS / Treasury Contacts Inquiry, Additional changes to chronology for Jean Hanson
DOT10947	Peter Rittling	Work Log	8/15/94			Handwritten notes mentioning transcript requests
ROIG3393	Office of Investigation Master Files	Letter	8/15/94	Robert Cesca, John Adair	Matt Murley	OIG WHS / Treasury Contacts Inquiry
ROIG3353	Office of Investigation Master File	Memo	8/16/94	Clark Blight	Patricia Black	OIG WHS / Treasury Contacts Inquiry, with attachments
ROIG3438	Patricia Black	Memo	8/16/94	Clark Blight	Patricia Black	IG WHS / Treasury Contacts Investigation, mentions an attached letter from Matt Murley

Bates	Source	Type	Date	To / cc	From	Subject
DOT10836	Asst. GC (Law and Ethics) -- Central Files	Letter	8/17/94	Frank Wolf	Robert Cesca	Response to 7/29/94 letter where there was expressed concern about the IG's contacts investigation
ROIG3388	Office of Investigation Master File	Letter	8/17/94	Frank Wolf	Lloyd Cutler	Response to 8/17/94 Wolf letter
TOIG236	Francine Kerner	Letter	8/17/94	Frank Wolf	Robert Cesca	Response to 7/29 letter concerning WHS / Treasury contacts on MGSL
ROIG3514	Steve Switzer	E-Mail	8/17/94	John Adair, cc: Patricia Black, Clark Blight	Steve Switzer	Update, 4th point mentions that Bond and two other staffers met with Jane Ley
ROIG3455	Particia Black	E-Mail	8/18/94	John Adair, cc: Steve Switzer, Clark Blight	Patricia Black	Met with Senator Bond's staff and spoke of their concerns
ROIG3517	Steve Switzer	Notes	8/18/94			Handwritten notes from meeting with Senator Bond's staff
ROIG3515	Steve Switzer	E-Mail	8/18/94	John Adair, cc: Steve Switzer, Clark Blight	Patricia Black	Meeting with Bond's staff
ROIG3311	Office of Investigation Master Files	E-Mail	8/18/94	John Adair, cc: Steve Switzer, Clark Blight	Patricia Black	Meeting with Senator Bond's staff to discuss their concerns
ROIG3352	Office of Investigation Master File	Letter	8/22/94	Mark Stein	Clark Blight	Letter in reference to discussion Stein and Blight had about OIC getting investigative transcripts and a copy of the report -- they were enclosed with this letter

Bates	Source	Type	Date	To / cc	From	Subject
ROIG3351	Office of Investigation Master File	E-Mail	8/22/94	Ellen Kulka, Andrew Tomback, cc: Switzer, Blight	Patricia Black	Request for information from Jim Wilson, Senator Bond's staff
ROIG3507	Steve Switzer	E-Mail	8/22/94	Kulka, cc: Tomback, Switzer, Blight, Adair	Patricia Black	Information request from Jim Wilson to review transcripts
ROIG3350	Office of Investigation Master File	E-Mail	8/22/94	Ellen Kulka, Andrew Tomback, cc: Switzer, Blight	Patricia Black	Information request from Jim Wilson, Senator Bond's staff
ROIG3506	Steve Switzer	E-Mail	8/23/94	Joan Dwyer, cc: Clark Blight, Steve Switzer	Patricia Black	Whitewater document request, Jim Wilson will be in the next day to review documents
DOT11409	Fran Davis	Letter	9/20/94	Grassley	Michael Levy	Letter in response to questions the Grassley had about Ed Knight nomination, with enclosed answers
ROIG3448	Patricia Black	Fax, Letter	9/22/94	Patricia Black	James Wilson	Pursuant to request for Treasury / RTC depositions, Letter attached from Howard Menell stating Wilson has access to all materials designated "Committee Confidential"
DOT10791	Asst. GC (Law and Ethics) -- Central Files	Deposition	9/25/94			Discovery ZX: 8/3/94 SBC Hearings
DOT11338	David Dougherty	Letter	9/26/94	Grassley	Michael Levy	Letter indicating answers to second set of questions submitted in connection to the nomination of Ed Knight were sent

Bates	Source	Type	Date	To / cc	From	Subject
DOT11418	Kenneth Schmalzbach	Letter	9/26/94	Grassley	Michael Levy	Letter in response to the Senator's questions about the nomination of Ed Knight, with enclosed answers
DOT10784	Asst. GC (Law and Ethics) -- Central Files	Letter	9/28/94	Lloyd Bentsen	Donald Riegler	Post hearing questions
DOT10787	Asst. GC (Law and Ethics) -- Central Files	Letter	9/28/94	Ed Knight	Donald Riegler	Post hearing questions
DOT11071	Fran Davis	Letter	9/28/94	Ed Knight	Donald Riegler	Post hearing questions
DOT10795	Asst. GC (Law and Ethics) -- Central Files	Letter	9/28/94	Lloyd Bentsen	Donald Riegler	Post hearing questions
OGE2231	OGE	Memo	9/30/94	Roger Altman	Jean Hanson	Memo regarding the Rose Law Firm in the "Early Bird"
TOIG071	Robert Cesca	Memo	10/3/94	James Cottos, Chester White, Robert Cesca	Francine Kerner	Whitewater Reports
TOIG158	Francine Kerner	Memo	10/3/94	James Cottos cc: Robert Cesca	Francine Kerner	Written questions from Senator Bond re: MGSL
DOT11283	Dennis Foreman	Memo	10/4/94	Dennis Foreman, cc: Yarbrough, Kenneth Schmalzbach	Stephen McHale	Questions for Ed, Questions received from Bond
DOT11007	David Hamill	Letter	10/4/94	Donald Riegler	Michael Levy	Response to 9/28/94 letter stating that Bentsen and Knight will be out of country and will not be able to respond to questions until later date

Bates	Source	Type	Date	To / cc	From	Subject
DOT11155	Stephen McHale	Memo	10/4/94	Dennis Foreman, cc: Yarbrough, Kenneth Schmalzbach	Stephen McHale	Questions for Ed from Senator Bond
TOIG159	Francine Kerner	Memo	10/4/94	Francine Kerner cc: Robert Cesca	James Cottos	Written questions from Senator Bond re: MGSL
DOT11086	Peter Rittling	Questions	10/6/94			Draft - Questions from Senator Bond
DOT11000	David Hamill	Questions	10/6/94			Draft - Questions from Senator Bond
DOT11029	Annabella Mejia	Questions	10/6/94			Draft - Questions from Senator Bond
DOT11037	Fran Davis	Questions	10/6/94			Draft - Questions from Senator Bond
DOT11074	David Hamill	Questions	10/6/94			Draft - Questions from Senator Bond
DOT11078	Ed Knight	Questions	10/6/94			Draft - Questions from Senator Bond
DOT11082	June Gayle Turner	Questions	10/6/94			Draft - Questions from Senator Bond
DOT11090	Kenneth Schmalzbach	Questions	10/6/94			Draft - Questions from Senator Bond
DOT11240	Stephen McHale	Questions	10/6/94			Draft - Questions, (with answers), from Senator Bond
DOT11080	Veronica Dawson	Questions	10/6/94			
DOT11284	Dennis Foreman	Questions	10/13/94			Questions from Senator Bond

Bates	Source	Type	Date	To / cc	From	Subject
DOT11228	Stephen McHale	Questions	10/13/94			Draft 10/13/94 Q&A
DOT11263	Stephen McHale	Questions	10/13/94			Draft - Questions (with answers), from Senator Bond
DOT06265	Jean Hanson	Calendar	10/14/94			Calendar for week 10/14/93
DOT10790	Asst. GC (Law and Ethics) -- Central Files	Fax	10/19/94	Robert McNamara	William Codinha	Request for submissions from Bentsen
DOT11000	David Hamill	Letter	10/19/94	Robert McNamara	William Codinha	Request for additional information from Bentsen
DOT11112	Kenneth Schmalzbach	To Do List	10/19/94			"To Do" List, handwritten notes in notebook
DOT11154	Stephen McHale	Fax	10/20/94	Jane Sherburne	Stephen McHale	Fax Transmittal Cover Sheet
DOT10751	Asst. GC (Law and Ethics) -- Central Files	Memo	10/20/94	Ed Knight	Stephen McHale	Response to Bond questions
DOT10752	Asst. GC (Law and Ethics) -- Central Files	Memo	10/21/94	Michael Levy	Ed Knight	Reponse to Bond questions
DOT11073	Fran Davis	Memo	10/21/94	Michael Levy	Ed Knight	Responses to Bond questions
TOIG121	Francine Kerner	Memo	10/21/94	Michael Levy	Ed Knight	Reponses to Senator Bond's Questions
DOT11037	Fran Davis	Letter	10/21/94	Donald Riegle	Michael Levy	Response to 9/28/94 letter, with attached answers to Bond questions and Tabs 1-7

Bates	Source	Type	Date	To / cc	From	Subject
DOT11005	David Hamill	Letter	10/26/94	William Codinha	Robert McNamara	Response to 10/19/94 Codinha letter requesting additional information from Bentsen
DOT10737	Asst. GC (Law and Ethics) -- Central Files	Letter	10/26/94	William Codinha	Robert McNamara	In response to his 10/19/94 letter
DOT11008	David Hamill	Letter	10/28/94	Lloyd Bentsen	Donald Riegle	Post hearing questions
DOT11068	Fran Davis	Letter	10/28/94	Lloyd Bentsen	Donald Riegle	Post hearing questions
DOT10731	Asst. GC (Law and Ethics) -- Central Files	Fax	11/1/94	Stephen McHale	Jane Sherburne	Fax of 11/1/94 letter from Bond to Riegle and D'Amato expressing concern about OGE's access to transcripts before report is out
DOT10732	Asst. GC (Law and Ethics) -- Central Files	Letter	11/1/94	Donald Riegle, Alfonse D'Amato	Christopher Bond	Letter expressing concern re: WHS access to transcripts requested by Cutler prior to OGE report being made public
TOIG0002	Robert Cesca	Memo	11/7/94	James Cottos, Francine Kerner	Valerie Lau	[Redacted] FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury
TOIG0001	Robert Cesca	Memo	11/7/94	Robert Cesca	Francine Kerner	[Redacted]
DOT11206	Stephen McHale	Questions	11/9/94			Draft - Questions, (with answers), from Senator Bond
FROIG0001	Patricia Black	Chronology	2/2/95			Chronology of events prepared by Black from calendars of Black, Switzer, and Adair in preparation for FBI interview

Sort BY DATE

RTC Production -- Referrals

16-Feb-95

Bates #	Source	Date	Description
1380148	KC PLS	3/19/87	Federal Home Loan Bank Board ("FHLBB") Criminal Referral Form with attached proposed 366 filings (N/A)
20232031	WDC PLS	3/7/88	memo from Hawkins to Jeddeloh re: Madison Guaranty Criminal Referral re: Robert Palmer (with handwritten notes) (N/A)
29022910	WDC RTC	3/7/88	memo from Hawkins to Jeddeloh re: Madison Guaranty Criminal Referral re: Robert Palmer (with handwritten notes) (N/A)
45944595	WDC RTC	12/11/91	memo from Brennan to Walton re: referral schedule in order of priority (N/A)
1760194	KC PLS	8/31/92	RTC Criminal Referral #C0004 re: Madison (Handwritten note to Julie "Per our phone conversation" - Iorio - 09/01/92 (N/A)
4959		9/10/92	memo from Lewis to Iorio re: referral #C0004 and effect of 3/92 New York Times article (N/A)
1872	WDC PLS	3/14/93	<div style="border: 1px solid black; padding: 5px; text-align: center;">FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury</div>
4946		5/4/93	letter from Lewis to Pence re: request for response re: referral #C0004 (NOC)
4944		5/10/93	e-mail from Iorio to Lewis and Jankowski re: meeting re: referral (NOC)
4938		5/19/93	memo from Lewis to Criminal Admin File (cc: Iorio and Ausen) re: conversation with Mitchell who has no record of #C0004 and decision to resubmit the referral to Koffsky (NOC)
4935		5/19/93	e-mail from Lewis to Iorio and Ausen re: call with Mitchell re: #C0004 had been forwarded to Henneman - conversation with Henneman - knew referral but thought it had been declined (NOC)
4931		5/26/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: referral had been sent to Ira Raphelson (NOC)

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Bates #	Source	Date	Description
4930		5/27/93	e-mail from Lewis to Iorio and Ausen re: call from Word re: assisting Henneman locate referral (NOC)
4928		6/8/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: Word found #C0004 in the Fraud Section to the Criminal Division and the individual assigned to the referral "didn't want to deal with it" - memo to Frazier re: no basis for Little Rock to rec
4927		6/23/93	e-mail from Lewis to Iorio and Ausen re: conversation with Henneman re: #C0004 - Henneman will contact Frazier to see what he decided re: referral before he left (NOC)
5023		7/20/93	e-mail from Yanda to Breslaw re: "JT has directed me to make sure we're ready when and if the criminal referrals generate additional inquiries on the civil side" (5)
4916		9/23/93	e-mail from Lewis to Iorio and Ausen re: conversation with Henneman re: upcoming referrals and #C0004 - she "assured me that; if necessary; the 'higher-ups' at Justice would make sure something got done with these referrals; including the first one; which
32713272	WDC RTC	9/23/93	e-mail from Lewis to Iorio and Ausen re: Conversation with Henneman re: new referrals - forwarded by Iorio to Cavinaw
4312	WDC RTC	9/24/93	e-mail from Iorio to Cavinaw; Thompson and Dudine (bcc: Ausen) re: delivery of "documents" re: Madison (referrals?) to Cavinaw; Thompson and Dudine - civil review materials will be available later (NOC)
4911		9/24/93	memo from Ausen to Dudine re: enclosed documents (referrals?) Iorio referred to in his 09/24/93 e-mail (copy not attached) (NOC)
4912		9/24/93	e-mail from Iorio to Cavinaw; Thompson and Dudine (bcc: Ausen) re: delivery of "documents" re: Madison (referrals?) to Cavinaw
4910		9/29/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: request for copies of the criminal referrals (NOC)
32743275	WDC RTC	9/29/93	e-mail from Lewis to Iorio and Ausen - forwarded by Iorio to Cavinaw; Thompson and Dudine - forwarded by Dudine to Gamble re: call from Henneman re: plan for new referrals (NOC)

Bates #	Source	Date	Description
4907		9/29/93	e-mail from Lewis to Iorio and Ausen re: call from Henneman re: conversation with Westbrook re: will get copies of whole referral directly from the USA - would like only copies of the transmittal letters and summaries from Lewis (NOC)
4311	WDC RTC	9/30/93	e-mail from Yanda to Iorio re: call with Glion re: legal review of referrals (Iorio's copy of the e-mail - see also 0062) (21)
62	KC PLS	9/30/93	e-mail from Yanda to Iorio (bcc: Carmichael) re: Plan for legal to review the referrals (21)
63	KC PLS	10/1/93	e-mail from Yanda to Carmichael and Adams re: confirmation (with Dudine's blessing) of two week period to review referrals (23)
4310	WDC RTC	10/5/93	e-mail from Donohue to Dudine; Baker; Gamble; Ambrose and Iorio re: call from Dick (FBI/HQ) re: status of referrals (NOC)
690070	KC PLS	10/6/93	e-mail from Lewis to Iorio; Ausen; Jankowski - forwarded to Cavinaw; Thompson; Dudine; and Yanda by Iorio re: planning to send referrals on Friday October 8th - FYI - Lewis e-mail re: Visit at her home by Schmidt and Schmidt's informative comments (28)
19811993	WDC PLS	10/7/93	memo from Carmichael and Adams to Yanda re: Legal Review of Madison Criminal Referrals (33)
43184330	WDC RTC	10/7/93	memo from Carmichael and Adams to Yanda re: Legal Review of Criminal Referrals (33)
17121724	WDC PLS	10/7/93	memo from Carmichael and Adams to Yanda re: legal review of Madison Criminal Referrals (33)
2580271	KC PLS	10/7/93	letter from Carmichael and Adams to Yanda re: Legal review of KCO's Investigations Criminal Referrals (33)
32403252	WDC RTC	10/7/93	memo from Carmichael and Adams to Yanda re: Legal Review of Madison Criminal Referrals (33)
27552767	WDC RTC	10/7/93	memo from Carmichael and Adams to Yanda re: Legal Review of Criminal Referrals (33)
71	KC PLS	10/7/93	e-mail from Brock to Adams and Carmichael re: Call by Julie (Yanda) - Iorio is requesting a status report on the referrals - would like to meet with them when she gets in (30)
49915003		10/7/93	memo from Adams and Carmichael to Yanda re: Legal Review of Referrals (33)

Bates #	Source	Date	Description
4890502	KC PLS	10/8/93	e-mail from Yanda to Dudine; Hindes; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: attached report on the 9 criminal referrals (See also 0079 and 0403 - 0409 above (33)
79	KC PLS	10/8/93	e-mail from Yanda to Dudine; Hindes; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: "Pursuant to RTC internal memorandum dated 06/17/93" attached is the report on the 9 criminal referrals (no attachment) (
4887		10/8/93	e-mail from Yanda to Dudine; Hindes; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: "pursuant to RTC internal policy memorandum dated June 17, 1993" attached in the legal review of the criminal referrals (
8170884	KC PLS	10/8/93	Madison Guaranty Savings & Loan Criminal Referral 730CR0190 with exhibits (N/A)
2720290	KC PLS	10/12/93	letter from Hinton through Ausen to Carmichael re: 10/08/93 cover letters for the Criminal Referrals from Ausen to Irons and Casey (cc: Henneman) (NOC)
291	KC PLS	10/12/93	memo from Ausen to Carmichael re: Legal Review of the KCO Criminal Referrals (34)
4886		10/13/93	letter from Lewis to Henneman (cc: Iorio and Ausen) re: attached copies of transmittal letters for and summaries of the nine criminal referrals submitted 10/08/93 (NOC)
82	KC PLS	10/13/93	e-mail from Carmichael to Adams and Yanda re: transmittal letters for the Madison referrals with copies to Irons and Henneman (Ethics Program Director - "EPD") EPD "is the subject of the phone call we received from Washington two weeks ago that began our
93	KC PLS	10/15/93	e-mail from Yanda to Carmichael re: Richard [Iorio's] agreement to allow Carmichael two weeks to review referral (48)
95	KC PLS	10/26/93	e-mail from Yanda to Hindes; Eisenstein; Kaufman; Iorio; Carmichael; Adams and Jankowski re: phone call from Schmidt re: alleged "dispute between Investigations and Legal that led to a delay in the recent criminal referrals out of Madison Guaranty." (55)
4860		10/27/93	letter from Casey to Lewis (cc: Westbrook) re: declination to prosecute Criminal Referral #C0004 (NOC)

Bates #	Source	Date	Description
2530255	KC PLS	11/1/93	letter from Iorio to Dudine (cc: Cavinaw; Yanda; Ausen; Carmichael and Lewis) re: attached documents: (1) 10/27/93 letter from Casey to Lewis (cc: Westbrook) re: declination to act of referral (#C0004?); and (2) 11/01/93 letter from Lewis to Casey (cc: We
545	KC PLS	11/9/93	e-mail from Yanda to Adams and Carmichael re: chronology of the progress of the referrals - "Please make this a top priority" (72)
4513	WDC RTC	11/12/93	letter from Ausen to Carlson (OTS) re: copies of the Madison criminal referrals (NOC)
4274	WDC RTC	11/15/93	e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton (bcc: Caron) re: 11/11/93 Washington Post article reporting on review of referral refuted by attached document (no attachment) (NOC)
42754277	WDC RTC	11/15/93	e-mail from Lewis to Iorio; Ausen and Caron re: attached white paper re: chronology of events re: referral #C0004 and subsequent referrals (NOC)
4531	WDC RTC	11/15/93	e-mail from Lewis to Ausen re: upcoming meeting with McKay on 11/22/93 re: validity of referrals (NOC)
4551	WDC RTC	11/15/93	e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton (bcc: Lewis) re: 11/11/93 Washington Post article reporting on review of referral refuted by attached document(no attachment) (NOC)
556	KC PLS	11/18/93	e-mail from Breslaw to Adams and Yanda re: copy of the indictment and the referrals (if a copy has not been sent to Jack Smith) (See also response at 1876 below) (96)
1876	WDC PLS	11/18/93	e-mail from Adams to Breslaw and Yanda re: copy of the indictment re: McDougal and the recent referrals (98)
557	KC PLS	11/18/93	e-mail from Yanda to Breslaw and Adams re: Jack does not have referrals (97)
3307	WDC RTC	11/19/93	memo from Adams to Breslaw re: attached copies of the Madison criminal referrals (no attachment) (98)
558	KC PLS	11/19/93	memo from Adams to Breslaw re: attached copies of the original criminal referral (C#0004) and the nine new referrals (98)
562	KC PLS	11/19/93	e-mail from Adams to Breslaw re: sending copies of nine 1993 and one 1992 referrals (98)

Bates #	Source	Date	Description
17251859	WDC PLS	11/19/93	memo from Adams to Breslaw re: attached Criminal referrals (attached is a copy of: (1) "Madison Guaranty Referral Summaries" (1726 - 1730); (2) Summaries of three "other" criminal referrals relating to Madison (1731 - 1732); and (3) copies of Madison Crim
43524381	WDC RTC	11/22/93	memo from Ausen to Winsett re: Summaries of Madison Referrals - Points out Altman was interested in the Campobello referral (#730CR0199) (summaries attached) (NOC)
1873	WDC PLS	11/29/93	e-mail from Eisenstein to Breslaw and "tlh" (Hindes) re: FDIC knowledge of the referrals (NOC)
5116	End File No. 35	11/29/93	memo from Dudine to Schulz re: attached criminal referrals (with 12/16/93 handwritten note from Downing to Dudine re: thanks) (NOC)
1882	WDC PLS	11/29/93	e-mail from Hindes to Breslaw re: hold on to referral if they were not requested by the FDIC (See also 1873) (NOC)
580	KC PLS	12/3/93	e-mail from Adams to Yanda and Eisenstein re: "Marcusen" and Seliga do not believe OTS exam exams were "knowingly" produced - Ausen reviewing referrals (see 0573 above) (115)
585	KC PLS	12/14/93	e-mail from Adams to Hambleton re: Ward documents - referral not responsive under FOIA (125)
4269	WDC RTC	12/15/93	e-mail from Caron to Iorio and Ausen re: Inventory of documents from which documents were obtained as backup to the referrals (NOC)
2655	WDC RTC	12/17/93	letter from Williams to Binkley and Lindenmuth re: Conversations re: RTC's responses to FOIA requests and criminal referrals (NOC)
600	KC PLS	12/22/93	e-mail from Adams to Marcusen and Yanda re: telephone conference - referrals not responsive to Rep. Leach's request (135)
19551956	WDC PLS	12/30/93	e-mail from Gamble to Hindes re: Information about the DOJ investigation contained in e-mail may not be complete because Gamble was only involved early when Legal and Investigations "were not seeing eye to eye about the filing of the referrals" but any pr
4258	WDC RTC	1/5/94	e-mail from Lewis to Iorio - forwarded by Lewis to Caron and Ausen re: correction - the Clintons were named as witnesses in referral # 192 and 196 (NOC)

Bates #	Source	Date	Description
637	KC PLS	1/5/94	e-mail from Yanda to Hindes; Dudine; Iorio; Penrose; Breslaw; Eisenstein; Kaufman and Adams re: Visit with OCOS - sent by supervisor in order to be "proactive" about the "issues this case would raise" re: referrals and Rose law firm (140)
4497	WDC RTC	1/5/94	e-mail from Lewis to Iorio - re: correction - the Clintons were named as witnesses in referral # 192 and 196 (NOC)
4254	WDC RTC	1/12/94	e-mail from Davidson to Iorio - forwarded by Iorio to Caron and Lewis re: Civil Fraud Review unable to find any additional claims not already addressed in the criminal referrals (NOC)
4252	WDC RTC	1/14/94	e-mail from Dudine to Iorio re: short summary of each referral in preparation for a briefing of Altman (NOC)
3507	WDC RTC	1/21/94	e-mail from Hinton to Iorio - forwarded by Iorio to Hinton - forwarded by Hinton to Carter re: RTC General Counsel would like a copy of original referral on McDougal (NOC)
28952901	WDC RTC	1/25/94	memo from Dudine to Kulka re: attached copies of criminal referrals
18601871	WDC PLS	1/25/94	memo from Dudine to Kulka re: attached copies of: (1) ten criminal referrals (copies not attached); (2) Madison Guaranty Criminal Referral Summaries (1861 - 1866); (3) Chronological Listing of Events; Civil Investigation (1867 - 1868); and (4) Criminal In
20322038	WDC PLS	1/25/94	memo from Dudine to Kulka re: enclosed copies of Madison criminal referrals (only copy of "Criminal Referral Summaries" attached) (NOC)
36623665	End File No. 22	1/30/94	Handwritten notes from 01/30/94; 01/25/94 and 01/21/94 meetings re: requests for Madison production of documents and information re: referrals (NOC)
42424243	WDC RTC	1/31/94	e-mail from Lewis to Ausen and Caron re: Madison Fire Drill #3 re: attached information as requested by Gamble re: loss figure for each criminal referral (NOC)
25852599	WDC RTC	2/4/94	RTC Office of Governmental Relations Correspondence Referral re: attached 02/03/94 letter from Leach to Altman re: recusal (with complete attachments) (distribution of final response to Knight; Morgan; Primrose; Carter; Lindsey; Martin and Kauper) (N/A)
21312175	WDC PLS	2/8/94	RTC Office of Governmental Relations Correspondence Referrals for letters to various Congressmen re: response to 02/08/94 letter from Faircloth et al to Altman re: statute of limitations (N/A)

Bates #	Source	Date	Description
23992405	WDC RTC	3/3/94	RTC Office of Governmental Relations Correspondence Referral re: attached 03/01/94 fax from Leach to Kusinski of 03/01/94 letter from Leach to Nussbaum et al re: Altman's recusal (copies sent to Kulka; Collishaw; Cooper and Binkley?) (Distribution of fin
42024206	WDC RTC	3/11/94	Printout of KCO - INV Criminal Referrals by Institution # (N/A)
34643466	Begin File No. 22	11/15/94	(** NOTE - Documents 3464 - 3490 are probably from Knight **) 11/15/94 e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton - forwarded by Hinton to Knight re: 11/11/93 Washington Post article re: declination of prosecution on first Madison referral
217	KC PLS	1/1/95	Handwritten Chronology re: McDougal 03/19/87 criminal referral (N/A)
2089	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0199 (prepared by ?) (N/A)
2090	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0198 (prepared by ?) (N/A)
2091	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0195 (prepared by ?) (N/A)
20922093	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0192 (prepared by ?) (N/A)
4550459	KC PLS	1/1/95	Handwritten notes re: criminal referral #C0004 (N/A)
2096	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0203 (prepared by ?) (N/A)
19942008	WDC PLS	1/1/95	Madison Guaranty Criminal Referral #7236CR0003 (with handwritten notes) (N/A)
1500161	KC PLS	1/1/95	Handwritten first draft of FHLBB Criminal Referral Form and answer to Question #6 (copies to go to Director of Examinations at FHLBB
2097	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0190 (prepared by ?) (with handwritten notes) (N/A)
149	KC PLS	1/1/95	Draft of answer to Question #6 of the FHLBB Criminal Referral Form (N/A)
20982099	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0196 (prepared by ?) (with handwritten notes) (N/A)
2100	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0211 (prepared by ?) (with handwritten notes) (N/A)
2101	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CR0210 (prepared by ?) (N/A)

Bates #	Source	Date	Description
20942095	WDC PLS	1/1/95	Notes and questions re: Criminal Referral 730CRC0004 (prepared by ?) (N/A)
816	KC PLS	1/1/95	File folder labeled "Madison Criminal Referrals" (N/A)
10301146	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0196 with exhibits (N/A)
11471258	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0198 with exhibits (N/A)
12591464	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0199 with exhibits (N/A)
14651543	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0203 with exhibits (N/A)
15441571	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0210 with exhibits (N/A)
2190226	KC PLS	1/1/95	Handwritten notes re: various 1992 referrals #C0001 - #C0005? (N/A)
8850924	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0192 with exhibits (N/A)
20092022	WDC PLS	1/1/95	Madison Guaranty Criminal Referral #7236CR0002 (with handwritten notes) (N/A)
21022108	WDC PLS	1/1/95	Summaries or Institution- Generated Criminal Referrals (7236CR0003
30753080	WDC RTC	1/1/95	Undated copy of the Madison Guaranty Criminal Referral Summaries (N/A)
3900395	KC PLS	1/1/95	Handwritten notes re: meeting with Jean Lewis re: criminal referrals - "can't leave this office
1942	WDC PLS	1/1/95	Handwritten notes re: chronology of referral info - reference to Carmichael memo and "Bernie" (N/A)
3880389	KC PLS	1/1/95	Handwritten notes of ? regarding meeting re: criminal referrals delivery and concerns (?)
2920386	KC PLS	1/1/95	Handwritten notes re: legal review of criminal referrals (N/A)
257	KC PLS	1/1/95	File folder labeled "Madison Criminal Referral Review" (N/A)
9251029	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0195 with exhibits (N/A)
15721691	KC PLS	1/1/95	Madison Guaranty Savings & Loan Criminal Referral 730CR0211 with exhibits (N/A)

Bates #	Source	Date	Description
33323346	WDC RTC	1/1/95	Madison Guaranty Criminal Referral 7236CR0003 (with handwritten notes) (N/A)
42484249	WDC RTC	1/1/95	Undated summaries of three existing criminal referrals (7236CR0003; 7236CR0002 and 7236CR0001) (N/A)
21092118	WDC PLS	1/1/95	Criminal Referral Timelines Institution 7236 - Madison and Referral Flowcharts (N/A)
38683880	Begin File No. 25	1/1/95	Undated draft of Questions and Answers re: Madison Criminal Referrals (with handwritten notes) (N/A)
38663867	End File No. 24	1/1/95	Undated list of Criminal Referral Files (N/A)
36493651	WDC RTC	1/1/95	RTC OGR Correspondence Referral re: 02/08/94 letter from D'Amato to Knight re: questions from Nappi (distribution to Kulka; Kauper and OGR) - 02/08/94 e-mail from O'Brien to Knight and Carter re: referral should go to Kusinski (not Lynn) (N/A)
3231	WDC RTC	1/1/95	Undated summary of Criminal Referral 730CR0190 (with handwritten notes) (N/A)
33473360	WDC RTC	1/1/95	Madison Guaranty Criminal Referral 7236CR0002 (with handwritten notes) (N/A)
43314340	WDC RTC	1/1/95	Criminal Referral Timeline and Flowcharts (N/A)
32383239	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0196 (with handwritten notes) (N/A)
3237	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0198 (with handwritten notes) (N/A)
3236	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0199 (with handwritten notes) (N/A)
3235	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0203 (N/A)
3234	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0210 (with handwritten notes) (N/A)
29662977	WDC RTC	1/1/95	Undated handwritten notes re: Madison criminal referrals (N/A)
3232	WDC RTC	1/1/95	Undated handwritten notes re: Criminal Referral 730CR0195 (N/A)
3580	WDC RTC	1/1/95	Notes from Steve Primrose - "Information from my own files re: Madison Criminal Referrals" (N/A)

Bates #	Source	Date	Description
47124728	WDC RTC	1/1/95	Criminal Referral #730CR0196 (N/A)
49804989		1/1/95	Madison Guaranty Criminal Referral Timelines and Flowcharts (N/A)
47944816	WDC RTC	1/1/95	Criminal Referral #C0004 (with exhibit index) (N/A)
47834793	WDC RTC	1/1/95	Criminal Referral #730CR0211 (N/A)
47724782	WDC RTC	1/1/95	Criminal Referral #730CR0210 (N/A)
47634771	WDC RTC	1/1/95	Criminal Referral #730CR0203 (N/A)
4225	WDC RTC	1/1/95	Undated chronology re: Criminal Referrals (N/A)
47294741	WDC RTC	1/1/95	Criminal Referral #730CR0198 (N/A)
45424545	WDC RTC	1/1/95	Madison Criminal Referral Summaries (handwritten notes at top - "prepared by AMK RTC/DC forwarded to LJJ 01/19/94" (N/A)
46954711	WDC RTC	1/1/95	Criminal Referral #730CR0195 (N/A)
46874694	WDC RTC	1/1/95	Criminal Referral #730CR0192 (N/A)
46764686	WDC RTC	1/1/95	Criminal Referral #730CR0190 (N/A)
4675	Begin File No. 30	1/1/95	File folder labeled "Criminal Referrals" (N/A)
46174631	WDC RTC	1/1/95	Copy of Madison Criminal Referral # 730CR0196 (with handwritten 08/23/93 note from Iorio re: changes) (N/A)
46094610	WDC RTC	1/1/95	Summaries of three existing criminal referrals (01/21/94 per [Iorio]) (N/A)
45904593	WDC RTC	1/1/95	Two draft copies of Estimated Criminal Investigation Referral Schedules (with handwritten notes) (N/A)
47424762	WDC RTC	1/1/95	Criminal Referral #730CR0199 (N/A)
28012816	WDC RTC	1/1/95	Criminal Referral #730CR0196 (without exhibits) (N/A)

Bates #	Source	Date	Description
29112925	WDC RTC	1/1/95	Criminal Referral #7236CR0003 (without exhibits) (with handwritten notes) (N/A)
3233	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0211 (with handwritten notes) (N/A)
28662884	WDC RTC	1/1/95	Criminal Referral #C0004 (without exhibits) (N/A)
28562865	WDC RTC	1/1/95	Criminal Referral #730CR0210 (without exhibits) (N/A)
28492855	WDC RTC	1/1/95	Criminal Referral #730CR0203 (without exhibits) (N/A)
32163220	WDC RTC	1/1/95	Undated Madison Guaranty Criminal Referral Summaries (N/A)
28172828	WDC RTC	1/1/95	Criminal Referral #730CR0198 (without exhibits) (N/A)
29262939	WDC RTC	1/1/95	Criminal Referral #7236CR0002 (without exhibits) (with handwritten notes) (N/A)
27942800	WDC RTC	1/1/95	Criminal Referral #730CR0192 (without exhibits) (N/A)
27782793	WDC RTC	1/1/95	Criminal Referral #730CR0195 (without exhibits) (N/A)
27682777	WDC RTC	1/1/95	Criminal Referral #730CR0190 (without exhibits) (N/A)
2734	WDC RTC	1/1/95	Index of Documents Relating to Criminal Referrals made by the RTC (N/A)
2207	WDC PLS	1/1/95	Question and answer re: Madison criminal referrals (page 9 of a briefing book?) (N/A)
22042206	WDC PLS	1/1/95	Question and answer re: Madison criminal referrals (N/A)
21762182	WDC PLS	1/1/95	RTC Office of Governmental Relations Correspondence Referral to various Congressmen (Cohen and Chafee) re: response to 02/08/94 letter from Faircloth et al to Altman re: statute of limitations (attached 02/09/94 e-mail from O'Brien to Washington re: two a
28292848	WDC RTC	1/1/95	Criminal Referral #730CR0199 (without exhibits) (N/A)
31453156	WDC RTC	1/1/95	Criminal Referral 730CR0198 (with handwritten notes) (without exhibits) (N/A)
32083215	WDC RTC	1/1/95	Undated Summaries of Institution- Generated Criminal Referrals (N/A)

Bates #	Source	Date	Description
32063207	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0??? (with handwritten notes) (N/A)
32043205	WDC RTC	1/1/95	Undated Summary of Criminal Referral 730CR0192 (with handwritten notes) (N/A)
31943203	WDC RTC	1/1/95	Criminal Referral 730CR0211 (with handwritten notes) (without exhibits) (N/A)
31843193	WDC RTC	1/1/95	Criminal Referral 730CR0210 (with handwritten notes) (without exhibits) (N/A)
28852894	WDC RTC	1/1/95	Criminal Referral #730CR0211 (without exhibits) (N/A)
31573176	WDC RTC	1/1/95	Criminal Referral 730CR0199 (with handwritten notes) (without exhibits) (N/A)
29792986	WDC RTC	1/1/95	Undated handwritten notes re: Madison criminal referrals (N/A)
31293144	WDC RTC	1/1/95	Criminal Referral 730CR0196 (with handwritten notes) (without exhibits) (N/A)
31133128	WDC RTC	1/1/95	Criminal Referral 730CR0195 (with handwritten notes) (without exhibits) (N/A)
31063112	WDC RTC	1/1/95	Criminal Referral 730CR0192 (with handwritten notes) (without exhibits) (N/A)
30963105	WDC RTC	1/1/95	Criminal Referral 730CR0190 (with handwritten notes) (without exhibits) (N/A)
30913095	WDC RTC	1/1/95	Undated copy of the Madison Guaranty Criminal Referral Summaries (N/A)
30813090	WDC RTC	1/1/95	Criminal Referral Timelines and Flowcharts (N/A)
52375239		1/1/95	Gabrellian's 01/10/94 (?) and 01/30/94 handwritten notes re: meeting with Dudine (?) and Gamble re: criminal referrals (NOC)
31773183	WDC RTC	1/1/95	Criminal Referral 730CR0203 (with handwritten notes) (without exhibits) (N/A)

SOPT B-1 DATE

RTC Production -- Cavinaw

16-Feb-95

Bates #	Source	Date	Description
4945		5/4/93	e-mail from Jankowski to Winsett and Cavinaw - forwarded by Iorio to Ausen and Lewis re: call from Arkansas Democrat-Gazette re: Tucker and Madison (NOC)
239	KC PLS	9/1/93	subpoena from Jackson to Cavinaw (9)
50006	KC PLS	9/15/93	Subpoena for the Eastern District of Arkansas for documents (from Fletcher Jackson) to Dennis Cavinaw (VP - RTC; KCO) (14)
32713272	WDC RTC	9/23/93	e-mail from Lewis to Iorio and Ausen re: Conversation with Henneman re: new referrals - forwarded by Iorio to Cavinaw
4912		9/24/93	e-mail from Iorio to Cavinaw; Thompson and Dudine (bcc: Ausen) re: delivery of "documents" re: Madison (referrals?) to Cavinaw
4312	WDC RTC	9/24/93	e-mail from Iorio to Cavinaw; Thompson and Dudine (bcc: Ausen) re: delivery of "documents" re: Madison (referrals?) to Cavinaw; Thompson and Dudine - civil review materials will be available later (NOC)
32743275	WDC RTC	9/29/93	e-mail from Lewis to Iorio and Ausen - forwarded by Iorio to Cavinaw; Thompson and Dudine - forwarded by Dudine to Gamble re: call from Henneman re: plan for new referrals (NOC)
61	KC PLS	9/30/93	e-mail from Lewis to Iorio and Ausen - Forwarded by Iorio to Cavinaw; Thompson and Dudine - Forwarded by Cavinaw to Curtis re: Phone call from Schmidt with the Washington Post - comment by Schmidt that people in the "legal and investigative community of R
690070	KC PLS	10/6/93	e-mail from Lewis to Iorio; Ausen; Jankowski - forwarded to Cavinaw; Thompson; Dudine; and Yanda by Iorio re: planning to send referrals on Friday October 8th - FYI - Lewis e-mail re: Visit at her home by Schmidt and Schmidt's informative comments (28)
4890502	KC PLS	10/8/93	e-mail from Yanda to Dudine; Hindes; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: attached report on the 9 criminal referrals (See also 0079 and 0403 - 0409 above (33)

1

Bates #	Source	Date	Description
79	KC PLS	10/8/93	e-mail from Yanda to Dudine; Hindes; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: "Pursuant to RTC internal memorandum dated 06/17/93" attached is the report on the 9 criminal referrals (no attachment) (
4887		10/8/93	e-mail from Yanda to Dudine; Hindes; Curtis; Cavinaw; Thompson; Iorio; Swiss; Kaufman; Ausen; Lewis; Gamble; Carmichael and Adams re: "pursuant to RTC internal policy memorandum dated June 17; 1993" attached in the legal review of the criminal referrals (
512	KC PLS	10/26/93	Same document as 0096 - 10/26/93 e-mail from Jankowski to Cavinaw and Iorio - forwarded to Yanda by Jankowski - forwarded to Marcusen
4873		10/26/93	e-mail from Yanda to Hindes; Eisenstein; Kaufman; Iorio; Carmichael; Adams; and Jankowski - forwarded by Iorio to Dudine; Cavinaw and Ausen re: call from Schmidt last night at home (55)
4872		10/26/93	e-mail from Jankowski to Cavinaw and Iorio (bcc: Lewis) re: call from Sue Schmidt (NOC)
511	KC PLS	10/26/93	e-mail from Jankowski to Cavinaw and Iorio re: Jankowski's call from Schmidt re: Ward litigation - forwarded by Jankowski to Yanda - forwarded by Yanda to Adams and Carmichael with comments to Adams re: Response from Ken (Foust?) re: Ward files (56)
510	KC PLS	10/26/93	e-mail from Jankowski to Cavinaw and Iorio - forwarded by Jankowski to Yanda - forwarded by Yanda to Adams; Carmichael; Foust and Iorio re: Jankowski's call from Schmidt re: Ward litigation (NOC)
96	KC PLS	10/26/93	e-mail from Jankowski to Cavinaw and Iorio - forwarded to Yanda by Jankowski - forwarded to Marcusen; Kaufman; Adams and Carmichael by Yanda re: (1) Jankowski's call from Schmidt re: Ward litigation; and (2) Assistance in finding Ward files (NOC)
2530255	KC PLS	11/1/93	letter from Iorio to Dudine (cc: Cavinaw; Yanda; Ausen; Carmichael and Lewis) re: attached documents: (1) 10/27/93 letter from Casey to Lewis (cc: Westbrook) re: declination to act of referral (#C0004?); and (2) 11/01/93 letter from Lewis to Casey (cc: We
100	KC PLS	11/2/93	e-mail from Lewis to Iorio; Ausen and Jankowski - forwarded by Iorio to Dudine; Cavinaw; Thompson and Yanda re: phone call from Kyle (AP) (62)
548	KC PLS	11/10/93	e-mail from Jankowski to Iorio and Cavinaw - forwarded by Iorio to Dudine; Yanda; Thompson and Ausen re: phone call from Taylor of the Kansas City Star and NBC News (75)

Bates #	Source	Date	Description
4519	WDC RTC	11/10/93	e-mail from Jankowski to Cavinaw and Iorio (bcc: Ausen) re: phone call from Taylor of the Kansas City Star and NBC News (75)
547	KC PLS	11/10/93	e-mail from Sweeter to Iorio - forwarded by Iorio to Cavinaw; Thompson; Dudine; Yanda and Ausen re: phone call from ABC News for Iorio (74)
4512	WDC RTC	11/12/93	e-mail from Mathews to Ausen; Cavinaw; Thompson; Yanda; Dudine and Hinton re: call from Frank of ABC News for Iorio (77)
4551	WDC RTC	11/15/93	e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton (bcc: Lewis) re: 11/11/93 Washington Post article reporting on review of referral refuted by attached document(no attachment) (NOC)
4274	WDC RTC	11/15/93	e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton (bcc: Caron) re: 11/11/93 Washington Post article reporting on review of referral refuted by attached document (no attachment) (NOC)
4533	WDC RTC	11/15/93	e-mail from Donohue to Iorio; Dudine; Baker and Gamble - forwarded by Iorio to Cavinaw
2634	WDC RTC	12/28/93	e-mail from Gamble to Iorio - forwarded by Iorio to Cavinaw; Hinton; Jankowski; Garrett and Swiss - forwarded by Garrett to Binkley re: DOJ's position re: response to Madison FOIA requests (NOC)
19571958	WDC PLS	12/28/93	e-mail from Gamble to Iorio - forwarded by Iorio to Cavinaw; Jankowski; Garrett and Swiss - forwarded by Hinton to Knight
3554	WDC RTC	12/29/93	handwritten notes from meeting in KCO with Marcusen; Swiss; Kaufman; Hinton; Jankowski; Binkley; Cavinaw; Carter re: assignments (NOC)
26352637	WDC RTC	12/30/93	memo from Binkley and Carter to Knight (Collishaw's address written in the top right corner) (cc: Cavinaw; Swiss; Kaufman; Marcusen; Hinton; Jankowski; Iorio; Turner; Collishaw; Kauper; Gamble; Breslaw; Hinds; Lindenmuth; Dudine; Garrett and Primrose re:
33093311	WDC RTC	12/30/93	memo from Binkley and Carter to Knight (Gambles's address written in the top right corner) (cc: Cavinaw; Swiss; Kaufman; Marcusen; Hinton; Jankowski; Iorio; Turner; Collishaw; Kauper; Gamble; Breslaw; Hinds; Lindenmuth; Dudine; Garrett and Primrose re: L
35143516	WDC RTC	12/30/93	memo from Binkley and Carter to Knight (cc: Cavinaw; Swiss; Kaufman; Marcusen; Hinton; Jankowski; Iorio; Turner; Collishaw; Kauper; Gamble; Breslaw; Hinds; Lindenmuth; Dudine; Garrett and Primrose re: Leach Inquiry - 12/29/93 visit to the KCO - Discussio

Bates #	Source	Date	Description
36943696	WDC RTC	12/30/93	(Draft of?) 12/30/93 letter from Binkley and Carter to Knight (cc: Cavinaw; Swiss; Kaufman; Marcusen; Hinton; Jankowski; Iorio; Turner; Collishaw; Kauper; Gamble; Breslaw; Hindes; Lindenmuth and Weatherly) re: Leach Inquiry and 12/29/93 visit to the KCO (
32843295	WDC RTC	1/4/94	fax from Caron to Dudine re: attached subpoenas (6 page fax?) to Swiss; Swift? and Cavinaw (NOC)
650	KC PLS	1/11/94	e-mail from Iorio to Kaufman; Yanda; Swiss; McNaul; Kohn; Dudine and Cavinaw re: Concern re: releasing documents to OCOS inquiry - Dudine will contact Cox at OCOS (149)
652	KC PLS	1/12/94	e-mail from Iorio to Kaufman; Yanda; Swiss; McNaul; Kohn; Dudine and Cavinaw re: Response from Cavinaw re: release of documents to OCOS - only certification and billing information re: Rose law firm can be released - forwarded by Yanda to Hindes
4247	WDC RTC	1/25/94	e-mail from Dudine to Iorio and Cavinaw - forwarded by Iorio to Ausen; Caron; Lewis; Foust; Davidson and Denton re: Per Kulka's and Ryan's request; Watts and Murray will examine if there are any liability claims that are still viable (Team from WDC will b
4413	WDC RTC	3/2/94	e-mail from Hindes to Gabrellian; Dudine; Igo; Breslaw; Arbit and Berry - forwarded by Dudine to Iorio and Murray - forwarded by Iorio to Foust; Lewis; Caron; Ausen; Cavinaw; Thompson; Dudine and Murray re: IG inquiry - Foust will maintain log of document
34643466	Begin File No. 22	11/15/94	(** NOTE - Documents 3464 - 3490 are probably from Knight **) 11/15/94 e-mail from Iorio to Dudine; Cavinaw; Thompson and Hinton - forwarded by Hinton to Knight re: 11/11/93 Washington Post article re: declination of prosecution on first Madison referral
36043609	WDC RTC	1/1/95	Notes from Carol O'Brien (OGR) to Gorman re: return of materials per conversation with Primrose (materials attached - 01/11/94 letter from Dudley to Mack (cc: Cavinaw) (NOC)
4294	WDC RTC	1/1/95	Same document as 2600 described above with 01/19/94 handwritten note from Iorio to cc: Ausen; Lewis and Caron (Cavinaw's copy) (Additional handwritten notes at bottom of memo to cc: DMC; GAP; DW; JN; K. Orf; LK; JW; RI [Iorio]

RTC Production -- Hanson

16-Feb-95

Bates #	Source	Date	Description
0	RA	3/1/94	letter from Rep. Leach to Altman re: resignation from RTC also attached are: (1) 03/01/94 letter from Rep. Leach to Nussbaum et al re: ethics issues involved in Treasury/White House meetings; (2) 02/23/94 letter from Hanson to Rep. Leach re: Altman's need
0	RA	3/3/94	memo from Knight to Nye (never sent) re: (1) list of meetings between RTC staff and Congressional staff re: Madison attached; (2) 03/03/94 letter from Hanson to Altman re: 01/24/94 meeting between RTC staff and D'Amato's staff (attached) (N/A)
35093511	WDC RTC	12/30/93	memo from Knight to Altman (cc: Hanson; Geer and Barker) re: status report on Leach Investigation (NOC)

1

**Interview of
William Roelle
Deputy Director
FDIC**

1:00 p.m., February 24, 1995

1. Boyden Gray contact to RTC re C0004:
 - a. Describe the events?
 - b. Your reaction?
2. Telling Altman about C0004:
 - a. When?
 - (1) First Altman staff meeting?
 - (2) Staff meetings were on Tuesdays?
 - (3) This was March 23?
 - b. Circumstances of conversation:
 - (1) After big staff meeting?
 - (2) What room were they in?
 - (3) Others present?
 - (a) Newman?
 - (4) Where was everyone standing?
 - (5) Did Newman participate in the conversation?
 - (6) Would he have heard what you said and what Altman said?
 - c. Any indication that Altman intended to pass this information on to anyone else at DOT or WHS?
 - (1) Any warning issued about use of this information?
 - d. Did C0004 ever come up again with Altman or anyone else at DOT?

3. Telling Hanson about the 9 referrals:
 - a. Lead up to calling Altman:
 - (1) How did you learn of the referrals?
 - (2) Before calling Altman what information did you have about the referrals?
 - (a) Know Tucker was named?
 - (b) Clintons named?
 - (c) Clinton campaign named?
 - (d) Other details?
 - (3) FRTC8: 9/27 fax from Cavinaw to Roelle; What form did you have that information in?
 - (a) Handwritten notes from conversation with Cavinaw?
 - (b) Had you received the fax from Cavinaw by the time you called Altman?
 - (c) Do you think Cavinaw was basically reading from the fax when he gave you the details about the referrals?
 - (d) Thus, your handwritten notes would have paralleled the fax even if you had not yet received the fax?
 - b. Altman call:
 - (1) Approximate time of Altman call?
 - (2) What did you tell him?
 - (3) Were you using your handwritten notes as talking points with him?
 - (4) Did you mention that Tucker was named?
 - c. Hanson call:
 - (1) Approximate time of Hanson call?

- (2) Between Altman and Hanson call, did you speak with anyone about the referrals?
 - (3) Between the calls, did you learn any more information about the referrals?
 - (4) Between the calls, did you receive the fax from Cavinaw?
 - (5) What did you tell her?
 - (6) Were you using your handwritten notes as talking points with her?
 - (7) Did you mention that Tucker was named?
- d. Any conversations with Hanson re referrals on/about 9/28?
- (1) DOT367: Hanson's call sheet from 9/28 listing "1. Bill Roelle/Dennis Cavanagh, etc."
 - (a) Any understanding of what this might reflect?
 - (b) Would Hanson have been speaking with you and Cavinaw about anything other than the referrals?
4. Warns Altman and/or Hanson about press inquiries:
- a. Events that may have caused Roelle to contact Altman or Hanson?
 - (1) RTC61: Lewis e-mail on 9/30 describing Schmidt trying to reach her and trying to get unlisted numbers:
 - (a) Ever see this?
 - (b) Ever have the substance of this e-mail relayed to you?
 - (c) Take any action, speak to Altman or Hanson about this?
 - (d) Whose handwriting is that? (mentions Jim Guy Tucker on it)
 - (2) RTC69: Lewis e-mail on 10/6 detailing Schmidt arriving at her house to ask questions:
 - (a) Is this the e-mail that you say Katsanos showed you?

- (b) Could you have called Hanson about this on 10/6?
 - (i) DOT142: Hanson chronology of 12/21 listing 10/6 "Hanson discussion with Roelle re Schmidt KC attempted interviews."
 - (ii) DOT369: Hanson 10/6 call sheet "*20. Bill Roelle - Sue Schmidt Kansas City" 9 criminal referrals
- (3) Conversation with Altman on 10/7:
 - (a) When?
 - (i) First staff meeting after 10/6 e-mail?
 - (ii) Next one would be Thursday 10/7?
 - (b) Circumstances of meeting?
 - (i) After staff meeting at Main DOT?
 - (ii) Altman not at meeting?
 - (iii) Go to Altman's office?
 - (iv) What time of day?
 - (v) Anyone else in room for this conversation?
 - (c) What do you tell Altman?
 - (i) Seeking unlisted numbers?
 - (ii) Showed up at Lewis' house?
 - (iii) Additional details about contents of referrals?
 - (iv) Other?
 - (d) What does Altman say or do?
 - (i) Call to Hanson?
 - (ii) What do you hear Altman say to her?

- (iii) Why don't you intervene to prevent her informing "Bernie" and others?
- b. Any subsequent conversations with Altman re referrals or press inquiries?
- 5. Discussion with Hanson re handling of criminal referrals:
 - a. Were you aware of press inquiries (Gerth) that the referrals were being held up in DC and that it was unusual for referrals to do to DC?
 - b. Did you have a conversation with Hanson where she asked how referrals are handled, i.e., is it normal for them to go to RTC-DC first?
 - (1) DOT6192: Hanson's call sheet with notes about how referrals are handled
 - c. When might this conversation have taken place?
 - d. What was said?
- 6. Discussion with Hanson where she asks to see the referrals:
 - a. Did Hanson ever ask you whether she could see the referrals?
 - (1) DOT6188: Hanson's call sheet listing "Bill Roelle -- Deloitte, 9 referrals -- request after sent to Justice"
 - b. When might this conversation have taken place?
 - c. What was said?
- 7. Any other conversations with Altman or Hanson re referrals or press inquiries that we haven't covered?
- 8. Anything you learned in the course of this investigation that you find surprising/interesting that you would like to tell us about?
- 9. Any recollection that is clearer now having heard the summer testimony?

FAX COVER SHEET

RESOLUTION TRUST CORPORATION
KANSAS CITY OFFICE
P.O. BOX 419570, 4900 MAIN, KANSAS CITY, MO 64141

TELEPHONE (816) 531-2212 OR TOLL FREE (800) 365-3342

FAX (816) 531-8934

DATE: 9/27/93

TIME: 2:47 PM

TO: Bill Roelle

LOCATION: _____

SUBJECT: _____

NUMBER OF PAGES: 4 INCLUDING COVER SHEET

FROM: Dennis Carraway

Please contact Lisa Passantino at (816) 531-2212 or (800)

365-3342, Ext. 7028 if transmission is not complete.

RTC
Resolution Trust Corporation

730 - Kansas City Office

CRIMINAL REFERRAL FORM

CRIMINAL REFERRAL # 730CR0211

1. NAME AND LOCATION OF FINANCIAL INSTITUTION

Name/#: MADISON GUARANTY SAVINGS AND LOAN
Location: 16TH AND MAIN, P.O. BOX 1583
LITTLE ROCK, ARKANSAS

CERTIFICATE NUMBER:

If activity occurred at branch office(s), please identify:

2. ASSET SIZE OF FINANCIAL INSTITUTION: \$118,855,000.

3. APPROXIMATE DATE AND DOLLAR AMOUNT (PRIOR TO ANY ALLOWANCE FOR RESTITUTION OR RECOVERY) OF SUSPECTED VIOLATION:

Date: APRIL 4, 1985 THROUGH OCTOBER 4, 1986
Amount: \$950,000. APPROXIMATELY

SUMMARY CHARACTERIZATION OF THE SUSPECTED VIOLATION. Check appropriate box(es)

<input type="checkbox"/>	Defalcation/Embezzlement	<input type="checkbox"/>	Bribery/Gratuity	<input type="checkbox"/>	Check Fraud	<input type="checkbox"/>	Other
<input checked="" type="checkbox"/>	False Statement	<input checked="" type="checkbox"/>	Misuse of Position or Self Dealing	<input type="checkbox"/>	Credit Card Fraud	<input type="checkbox"/>	
<input type="checkbox"/>	Check Kiting	<input type="checkbox"/>	Mysterious Disappearance	<input type="checkbox"/>	Money Laundering	<input type="checkbox"/>	

Applicable Section(s) of the U.S. Code:

<input type="checkbox"/>	18 USC 2	Aiding & Abetting	<input type="checkbox"/>	18 USC 1030	Computer Fraud
<input type="checkbox"/>	18 USC 152	Concealment of Assets	<input type="checkbox"/>	18 USC 1341	Mail Fraud
<input type="checkbox"/>	18 USC 215	Bribery/Gratuity	<input type="checkbox"/>	18 USC 1343	Wire Fraud
<input checked="" type="checkbox"/>	18 USC 371	Conspiracy	<input checked="" type="checkbox"/>	18 USC 1344	Bank Fraud
<input checked="" type="checkbox"/>	18 USC 657	Defalcation/Embezzlement/Misuse of Position	<input type="checkbox"/>	18 USC 1021	Forgery
<input checked="" type="checkbox"/>	18 USC 1001	False Statement to Federal Agency	<input type="checkbox"/>	18 USC 1951	Racketeering
<input type="checkbox"/>	18 USC 1006	False Entry	<input type="checkbox"/>	18 USC 1956/1957	Money Laundering
<input checked="" type="checkbox"/>	18 USC 1007	False Statement/Document	<input type="checkbox"/>	18 USC 2113	Entering Financial Inst w/ Intent to Commit Felony
<input checked="" type="checkbox"/>	18 USC 1014	False Statement to Financial Institution	<input type="checkbox"/>	18 USC 2314	Transportation of Stolen Goods, Securities, Money
<input type="checkbox"/>	18 USC 1029	Credit Card Fraud	<input type="checkbox"/>		

5. THIS MATTER IS BEING REFERRED TO:

FBI, LITTLE ROCK, ARKANSAS
AND THE U.S. ATTORNEY IN EASTERN DISTRICT LITTLE ROCK, ARKANSAS
FOIA # none (URTs 16305) DocId:70105134 Page 173

000009

Madison Guaranty Savings & Loan
Criminal Referral #730CRO211
September 23, 1993 Page 2

PERSON(S) SUSPECTED OF CRIMINAL VIOLATION: Complete subparagraphs (a) through (e) on each individual suspected of criminal activity. (If more than one, use continuation sheet). Include primary suspects only. Individuals who may have knowledge of the suspect criminal activity, but who are not themselves suspected of being involved, should be listed as witnesses under Item 10. Provide any additional details known with respect to prior referrals or affiliations.

a. NAME: (First/MI/Last) McDougal, James E.
ADDRESS: (Street/City/State/Zip) Current Address Unknown
DATE OF BIRTH: (Month/Day/Year) 8/25/40
SOCIAL SECURITY NO: 431-74-5041

b. Relationship to the financial institution: (Check all applicable blocks)

<input checked="" type="checkbox"/>	Officer	<input type="checkbox"/>	Employee	<input type="checkbox"/>	Broker	<input checked="" type="checkbox"/>	Shareholder	<input type="checkbox"/>	Appraiser
<input checked="" type="checkbox"/>	Director	<input type="checkbox"/>	Agent	<input checked="" type="checkbox"/>	Borrower	<input checked="" type="checkbox"/>	Account Holder	<input checked="" type="checkbox"/>	Owner/COB

c. Is person still affiliated with the financial institution:
___ Yes ___ No

If No, terminated ___, resigned . Date (Month/Day/Year):

Describe circumstances: (If necessary, use continuation sheet)

McDougal resigned from the Board of Directors in December 1985; however he remained active in the Association's day to day business via his involvement in it's wholly owned subsidiary, Madison Financial Corporation. He was removed from any further affiliation with the Association by the Federal Home Loan Bank in July 1986.

d. Prior or related referrals:
 Yes ___ No

If Yes, please identify.

McDougal was indicted, tried and acquitted in 1989 on bank fraud charges stemming from the Castle Grande loan transaction funded by Madison Guaranty Savings & Loan. In addition, RTC Investigations has submitted the following criminal referrals naming McDougal as a suspect:

- 1) #C0004, submitted 9/1/92, alleging McDougal's involvement in an elaborate check kiting scheme perpetrated through various accounts at MGS&L.
- 2) #730CRO190 alleging McDougal's involvement in a scheme to divert loan proceeds for the benefit of Jim Guy Tucker.
- 3) #730CRO192 alleging McDougal's participation with J.W. Fulbright in an alleged scheme to embezzle and/or kite funds through MGS&L accounts.
- 4) #730CRO195 alleging McDougal's abuse of position and conspiracy to defraud MGS&L of over \$8 million in funds channeled into and through it's subsidiary, Madison Financial Corporation
- 5) #730CRO196 alleging McDougal's involvement in a conspiracy to divert loan proceeds for use as campaign contributions
- 6) #730CRO198 alleging McDougal's misuse of position and conspiracy by participation in a land flip
- 7) #730CRO199 alleging McDougal's conspiring to deceive regulators and to contrive fees and income.
- 8) #730CRO203 alleging McDougal's aiding and abetting another Madison Guaranty loan officer in making a fraudulent loan, misusing his position.
- 9) #730CRO210 alleging McDougal's participation in diverting funds from an MGS&L loan made to straw borrowers

Madison Guaranty Savings & Loan
Criminal Referral #73UCR0211
September 23, 1993 Page 3

a. Is person affiliated with any other financial institution;
 X Yes No

or business enterprise:
 X Yes No

If yes to either or both, please identify.

McDougal was the principal shareholder and Board Member of Madison Bank & Trust, formerly the Bank of Kingston.

McDougal is a principal in the following business enterprises:

Madison Marketing
McDougal & Associates
Flowerwood Farms, Inc.
Pembroke Manor, Inc.
Great Southern Land Co.
Smith-Tucker-McDougal
Kings River Land Company

Designers Construction
Madison Financial Corporation
White Water Development Corp., Inc.
Rolling Manor, Inc.
Tucker-Smith-McDougal
Smith-McDougal
Lion Oil Company

FACSIMILE TRANSMITTAL MEMO

OFFICE OF THE DIRECTOR
FEDERAL DEPOSIT INSURANCE CORPORATION
550 17TH STREET, N. W., ROOM 6098
WASHINGTON, D. C. 20429

TEL: 202-898-6956

FAX: 202-898-8881

DATE: May 31, 1994

TO: Tom Marsh

FAX NUMBER: 514-8802

PHONE NUMBER: _____

FROM: Bill Roelle

NUMBER OF PAGES 5 (INCLUDING TRANSMITTAL SHEET)

PLEASE CONFIRM RECEIPT @ 202-898-6956

(PLEASE DELIVER IMMEDIATELY)

*M&D - Anniversary

Tom Hinderes -
NY Times

M&D
Barney
Moira Kollow
244-5632
10/4 or 10/5
upholsterer

9/28/93

1. Bill Roelle / Dennis Cavanagh

Dennis - Bill Hillers

- 2. Roger

3. Stanley Tate 736-9662

Bernie Nussbaum

- 4. Tom McHovern

- 5. Bill Bowdin

Dan - McDougal -

- 6. Leslie Strauss

Madison Savings

* ~~7~~ 7. ~~for~~ Bernie Nussbaum

- 8. Skip Hove

9. Mike Levy

-> 10. Chris Edley

Dennis - S. Tate's letter

- 11. Steve Glover 212-820-8726

CC meeting - GM/Agenda

- 12. Valerie Jacob 212 820 8158

Buyer Jupiter

- 13. Rick Carro

Swiss Co.

- 14. Ken Austin / Ed Cummings

Keyholder

15. ~~for~~ Rick Saunders

Tax Ct procedures

- 16. Frank Newman

McCandless

-> 17. Dicta Ford 786-9662

Substantive sanctions

18. Rick Carro - Superfund

FOIA - pers. notes

19. Ellen Seidman 416-2802

Meeting issue

20. Jeff Powell 514-2069

Schwartzlauf

* 21. Tom McGivern 22317

Comp time

22. Bill Roelle / Skip

Landmark Land

Rick will take next

Vacancies Act

couple of days off -> will transfer at
end of pay period (Fri. or next Fri.)

Allied signal
L Hank

* 16 Report to Bill Roelle

367

3/9/94

To: L. Richard Iorio@INVEST-1@RTCKC
Cc: Lee O. Ausen@INVEST-1@RTCKC
Bcc:
From: L. Jean Lewis@INVEST-1@RTCKC
Subject: #7236 Madison Guaranty Savings
Date: Thursday, September 30, 1993 13:58:47 CDT
Attach:
Certify: N
Forwarded by: Dennis M. Cavinaw@EXEC@RTCKC

Comments by: Dennis M. Cavinaw@EXEC@RTCKC
Forwarded to: E. Glion Curtis@Legal-Exec@RTCKC
Comments:

FYI-please call after reading

Comments by: L. Richard Iorio@INVEST-1@RTCKC
Forwarded to: Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXECFSC@RTCKC
James R. Dudine@Oper-inv@RTCDC
Comments:

FYI. Public affairs Kansas City has been advised.

----- [Original Message] -----

Just to let you know; I've received a call from Sue Schmidt with the Washington Post. She stated that there were certain people within the legal and investigative community of RTC that were afraid certain stories were being deep-sixed that needed to be broken, and she had been given my name as someone to whom she needed to speak about such potential stories. She further stated that she had tried to contact me at home, but had not been able to reach me as my number is unlisted. She then asked me if I was the Laura Jean Lewis in Shawnee Mission, Kansas, whose number was unlisted.

I advised Ms. Schmidt that regardless of whatever story she was looking for, I had no comment, advised her to contact Jane Jankowski, gave her the number, thanked her for understanding and appreciating my position, and discontinued the call.

*8-9 referrals ready to go
Madison Guaranty Savgs
Roele
Clinton witnesses
Fun guy
Schmidt doing story Rose Law firm*

000061

To: L. Richard Iorio@INVEST-1@RTCKC
Cc: Lee O. Ausen@INVEST-1@RTCKC
Jane M. Jankowski@OLA@RTCKC
Bcc:
From: L. Jean Lewis@INVEST-1@RTCKC
Subject: #7236 Madison Guaranty Savings
Date: Wednesday, October 6, 1993 10:01:54 CDT
Attach:
Certify: N
Forwarded by: Julie F. Yanda@LEGAL-PLS@RTCKC

Comments by: L. Richard Iorio@INVEST-1@RTCKC
Forwarded to: Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXEFCFSC@RTCKC
James R. Dudine@Oper-inv@RTCKC
Julie F. Yanda@LEGAL-PLS@RTCKC
Comments:

FYI. We are planning to mail the criminal referrals on Friday
10-8-93. PLS review is proceeding on schedule. Thanks

----- [Original Message] -----

Based on our conversation of yesterday evening, the following is a recap of what transpired when Washington Post report Sue Schmidt showed up at my front door.

She arrived around 7:15, I allowed her to step inside my door, I listened to what she had to say, and then escorted her out the door at approximately 7:30. When I showed her out the door, my parting comment was "when you contacted me last Thursday, I told you that I had no comment, and made every effort to be polite in doing so. What you have done this evening is the most unprecedented breach of professional courtesy that I've ever witnessed, so I will say this one more time, and one more time only. Do not contact me again at my office, or at my home. I have no comment on your investigation and will not answer any of your questions. Do not waste anymore of my time or yours."

She asked a number of questions, and made a number of comments, to all of which I responded with "no comment" or said nothing. I did, however, listen to what she had to say, and it was significant. I believe that she has the crux of the referral sent last year, and that she intends to pursue the story.

She wanted to know:

- 1) if I was aware of the transaction between Whitewater Development and International Paper Realty (this is not the topic of one of the referrals, but is something that I looked at writing a referral on...she had significantly more information than I did, which I believe was provided by Jim McDougal, whom she said she interviewed yesterday)
- 2) if she should continue looking at all of McDougal's other companies, specifically naming Madison Marketing, Great Southern Land Company, and a number of other companies identified in referral C0004.
- 3) if I was aware that Seth Ward was Webb Hubbel's father in law
- 4) if I was aware that three senior partners at the Rose firm (that I would prefer not to identify thru e-mail but will provide verbally if asked) "ran

off" senior partner Joe Giroir due to the fact that he was grossing more firm profits than they were (she cited a bonus amount of \$500,000)

5) if I was frustrated that my "work product was stymied and road blocked at certain federal levels", which seems to indicate that she knows that referral C0004 was held up in Washington for 9 months before it went sent back to Little Rock.

6) if the late "Vince Foster was tied to any of this".

7) if I was aware that Jeff Gerth of the New York Times was reopening his investigation of the Whitewater story he wrote last year. She then added that he would probably be the next reporter to appear on my doorstep. I thanked her for the heads up.

8) she requested my unlisted home phone, and I declined.

All of this is just an encapsulated version of her comments, which were more informative than what I've outlined here. I'll be glad to discuss this further at your request. Please let me know if you have any questions.

000070

plu
3/9/94
Rm 3000
iCPR

12/21/93
Privileged and Confidential
Attorney Work Product

MADISON GUARANTY
Chronology

September 27, 1993	Call from B. Roelle to J. Hanson
September 29, 1993	Meeting with B. Nussbaum, J. Hanson and Cliff Sloan in B. Nussbaum's office following Waco pre-brief
October 6, 1993	J. Hanson discussion with B. Roelle regarding S. Schmidt Kansas City attempted interviews
October 14, 1993	Meeting in B. Nussbaum's office with Cliff Sloan, {Mack} Gearan, Bruce Lindsey, Jack DeVon, Josh Steiner and Jean Hanson
December 9, 1993	Letter from Congressman Jim Leach to Roger Altman requesting information on Madison Guaranty.

Carol Anderson

PCI Communications
Charles Bennett 10/27 Jay

10/6/93

- 1. HBH
- 2. Celeste May
- 3. Steve Katsanos
- 4. ~~Walter~~ Tate 786 9668
Deloitte / Celeste
- 5. Coors - Memo for Secretary
Bob McNamara
- 6. McCandless - Sec's response
- 7. Al Byrne
310 / 327 / 330
345 / paper for 45 at our cost of funds
320 - 330
- 8. Rick Aboussie 736-3022
- 9. Susan Levine
- 10. Mark Hington
- 11. Bill Bowden
- 14. Robin Gross
- 15. Chris Peacock
- 16. Josh Steiner - Ken Schmalybach
- health care funding
- 17. John Lowman
- * 18. Jan Piercey
- 19. Tom McHiver

Steve Katsanos
Rick Carro -
EPA
Hag Claims

Mark Hington - Tammy
Lawley



GAO - list of
volumes of
CFR

→ 9 ch. referrals

* 20. Bill Ruelle - Sue Schmidt
Kansas City

- 21. Liliane Martino

- 22. Alan Paul - 789-6021 Lawpro Law Heart

369

fw
3/9/94

FDIC - Atlanta - liquidations -> new office
- Tom Rose - talked about end of November
Head of legal
Keith Seebolt - head of client size

* Timing - Bill Roelle

Union

AFGE Am. Fed. Gov't Emps
NTEU - FDIC union - Natl. Treas. Emp'rs Union

* Transition plan issue

Crm referrals

- by Agmt, ^{*} crm coordinator reviews before it goes -> Kansas City - KC office - pls
- Anything ^{with high} publicity / prominent officials / open banks - goes to Washington

(Glen Curtis & Rogan/ Frank)

Bill Koelle
301-977-1738 (H)

-> IG -> Jonathan
Fichter

James Couch

Johnnie Booker 416-6925 Bryan Jupiter
Christine Varney 456-6780

* Celeste May 703-761-8492 - Art Kusinski 416-7469

Stanley - pls / Skip / Oversight 786-9662
Organizational Chart

Board / Stay out of **Centrust**

Frank - John Bowman / staffing / Skip Howe

Bernie - RTC GC / pledge

Bill Koelle - Deloitte 416-7579

9 referrals - Request after suit to Justice

Rogan - Celeste

Bill Bowden 874-5200

- Donna Cunningham

- Rick Aboussie - Contingent fees

- Conflicts committee - suggested procedures
12 CFR 1606.3

Special Assistant
Chief Counsel
RTC Gen Counsel

-> Vetting process
Leslie

Liliane Martins

* Personnel actions

Interagency meetings
New executive order

Marubeni appeal - brief filed by 10/18
Rag claims act

6188



RTC Production -- Roelle*16-Feb-95*

Bates #	Source	Date	Description
19781979	WDC PLS	1/1/95	Undated draft from Breslaw to Roelle and Eisenstein re: Madison Bond Claim Close-Out (N/A)
20452051	WDC PLS	2/26/94	memo from Breslaw to Jacobs and Roelle (cc: Seidman; Rosen; Thomas; Monahan; Braceley; Jacobs; Beaty; Roelle; Dudine and Martinelli) re: Request for authorization to Accept Settlement Offer from Frost for \$1.025.000 (signed copy) (N/A)
33973398	WDC RTC	1/1/95	Undated unsigned memo from Breslaw and Scott to Eisenstein and Roelle (cc: Rosen; Thomas; Beaty; Roelle; Dudine; Eisenstein; Braceley; Bartley; Martinelli; and Asbacher) re: Termination of D&O Liability Investigation (N/A)
33993400	WDC RTC	1/1/95	Undated unsigned memo from Breslaw to Eisenstein and Roelle (cc: Rosen; Thomas; Beaty; Roelle; Dudine; Eisenstein; Braceley; Bartley; Martinelli; and Asbacher) re: Bond Claim Close-Out (N/A)
34013407	WDC RTC	2/26/91	memo from Breslaw to Jacobs and Roelle (cc: Seidman; Rosen; Thomas; Monahan; Braceley; Jacobs; Roelle; Dudine and Martinelli) re: Request for Authorization to Accept Settlement Offer (N/A)
37973798	WDC RTC	10/18/89	memo from Asbacher to Thomas and Roelle (cc: Byrne; Douglas; Rosen; Bartley; Wood and Martinelli) re: Madison D&O Claim Close-out (N/A)
37993800	WDC RTC	1/18/90	memo from Asbacher prepared by Sorenson to Underwood and Roelle (cc: Byrne; Douglas; Rosen; Bartley; Wood; Martinelli and Asbacher) re: Madison Bond Claim Close-out (N/A)
38083815	WDC RTC	3/5/91	memo from Beaty to Thompson (cc: Curtis and Asbacher) re: attached 02/26/91 memo from Breslaw to Jacobs and Roelle (cc: Seidman; Rosen; Thomas; Monahan; Braceley; Jacobs; Beaty; Roelle; Dudine; and Martinelli) re: request for Authorization to Accept Settl

Mr. Rosen
Mr. Thomas
Mr. Beaty

Mr. Roelle
Mr. Dudine
Mr. Eisenstein

Ms. Bartley
Ms. Keyes
Mr. Martinelli, R/D
Mr. Asbacher, SIS

TO: William Roelle
Director, Operations and Resolutions

and

David Eisenstein
Senior Attorney

FROM: April Breslaw *AB*
Senior Attorney

SUBJECT: Madison Guaranty Savings & Loan Association
Little Rock, Arkansas
In Conservatorship #8313
Bond Claim Close-Out

This memorandum requests your authority to terminate the Bond Claim investigations for Madison Guaranty Savings & Loan Association (the association) based on the following investigative findings.

The association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the association was largely the result of the influence of James B. McDougal. McDougal purchased the association and served as its president until late 1984. It is believed that he continued to affect the operations of the association through his role in its holding company after he resigned from his management positions. This period of indirect influence seems to have occurred between late 1984 and July 1986. In any event, McDougal was the subject of a criminal referral filed by the association on March 19, 1987. There is an ongoing criminal investigation into his activities.

The association's last blanket bond expired on April 30, 1987. Renewal or replacement coverage could not be secured. Insider loans and losses caused by acts of James McDougal, his wife Susan, and John Latham were excluded from coverage. No notice or claims were ever submitted to the bond carrier.

Fidelity bonds generally provide coverage for losses caused by officers on employees. If it can be shown that a director is functioning as an officer, e.g., making specific operational decisions, it is possible to obtain bond coverage for losses caused by such a director's dishonesty. In this case, McDougal left management in 1984. While the criminal referral submitted in 1987 indicates that potentially dishonest activity was discovered during the life of the bond, such activity appears to have occurred after McDougal had lost status as an officer directly covered by the

bond. His role at the time dishonesty may have occurred would likely not be considered operational enough to merit coverage. The cost of pursuing such an approach with the bond carrier outweighs its benefit.

Based on the foregoing information a close-out of the Bond Claim is recommend.

Concurred:

David Eisenstein
Senior Counsel

William Roelle, Director
Operations and Resolutions

Chairman Seidman
Mr. Rosen
Mr. Thomas
Mr. Monahan
Mr. Braceley

Mr. Jacobs
~~Mr. Beatty~~
Mr. Roelle
Mr. Dudine
Mr. Martinelli, R/D

February 26, 1991

Memorandum To: Gerald Jacobs
Special Counsel to the RTC

and

William Roelle
Deputy Executive Director

From: April Breslaw *ARB*
Senior Attorney

Re: 7236 Madison Guaranty Savings and Loan
Augusta, Ark. - In Receivership

Request for Authorization to Accept
Settlement Offer

RECOMMENDATION

This memorandum requests authority to settle a pending accounting malpractice case by accepting the \$1,025,000 offered by Crum and Forster ("C&F"), the carrier which provided defendant Frost and Company ("Frost") with liability coverage.

C&F has not given a specific date on which its offer expires. However, our case is scheduled for trial on March 25, 1991. If authorization to accept the carrier's offer is granted by March 11, 1991, we will save the expense of the final two weeks of trial preparation. We estimate this amount to be approximately \$50,000.¹

¹ Past experience indicates that C&F displays more serious interest in settlement as a trial date approaches. In this case, we do not believe that C&F is aware that there is a real chance that our trial will be rescheduled for next Fall. If C&F becomes aware of this possibility, it may rescind the offer, invest the settlement funds, and resume bargaining with us in eight to ten months. Avoiding this contingency is another reason to evaluate the outstanding offer quickly.

Elements of the Claim

In order to prevail, we must prove the existence of:

- (1) an audit failure
- (2) which caused
- (3) loss.

1. Audit Failure

Frost audited the Madison Guaranty Savings and Loan ("Madison") financial statements for 1984 and 1985. In each instance, an unqualified opinion, i.e., one which concluded that the statements fairly reflected the S&L's financial condition, was issued. However, the FHLBB's 1986 examination found significant deficiencies in Madison's accounting treatment of real estate development projects, subsidiary investment, and reserve for loan losses. The adjustments imposed as a result of this examination rendered Madison insolvent.

Madison subsequently retained Peat, Marwick, Main and Company to re-audit the statements first evaluated by Frost. Peat, Marwick reached two conclusions: first, that Madison's internal controls were so poor that the S&L's financial statements were virtually incapable of audit and second, that there was serious question about Madison's ability to continue as a going concern. Because these were very different conclusions that those reached in the initial audits, Madison sued Frost for malpractice.

We inherited the case when Madison was placed in conservatorship in 1989.² Investigation by in-house CPA Lee Sorenson of NCCO supports the conclusion that audit failures occurred. Most significant, Frost did not calculate Madison's loan loss reserve by performing detailed review of specific loans. Instead, Frost simply allotted one per cent of the outstanding balance of each relevant category of loans to the reserve. Further, Frost failed to test the adequacy of any of the appraisals in Madison's files and entirely based its past-due loan testwork on information provided by Madison's management. No attempt to verify this information through appraisal or financial statement data was made.

Our independent expert has testified that Frost should have evaluated the risk of loss in Madison's portfolio by classifying loans as bank examiners do. He's further testified that Laventhol and Horwath ("L&H"), the firm with which he was a partner until its recent bankruptcy, employed this approach to

² Since "final resolution" in October of 1990, we have pursued the matter on behalf of RTC Corporate.

bank and S&L audits as a standard practice.

Unfortunately, our expert has only been able to produce documentation which shows that L&H routinely handled bank audits in this manner. He has not been able to document standard practice for S&L audits.³ Further, Frost's attorneys have discovered an S&L audit performed by another L&H partner at about the same time as those at stake in this case in which a different method of evaluating risk of loss was employed. If the case is tried, Frost's attorneys will certainly use these inconsistencies to attack the credibility of our expert.

It is, however, worth noting that the relevant accounting standards do not require that an auditor use any specific method of evaluating risk of loan loss. Instead, they require only that a method be used which considers the overall circumstances surrounding the tested transactions. In its re-audit of Madison, Peat Marwick used a different method than the one recommended by our expert, but reached the same conclusions. Because Frost did not employ any such method, we should be able to prove that its audits are flawed - regardless of the problems with our expert's testimony. Overall, our chance of prevailing on this element of the case is approximately 70 per cent.

2. Causation

In any accounting malpractice case, we must show that the relevant S&L relied on the flawed audits to make subsequent business decisions. Put another way, we must show that but for its reliance on flawed audits, the S&L would have stopped or slowed investment in the speculative projects which ultimately caused loss. In an Arkansas malpractice case, we must show that in comparison with other possible causes, the defendant auditor was more than 50% responsible for the loss which resulted from its flawed audits.

In this case, we will have a series of problems demonstrating that Madison relied on the audits to make decisions. First, Madison CEO John Latham plead guilty to bank fraud charges last Spring. It is highly unlikely that different audits would have influenced his decision making. Second, Madison's board of directors was passive. For the most part, it did what Latham and primary shareholder McDougal told it to do.⁴ Even today, only one

³ Contrary to our expert's initial testimony, it appears that L&H did not have a standard approach to S&L audits.

⁴ McDougal was tried for bank fraud last Spring. Mainly through prosecutorial error, he was acquitted.

Memorandum to Mr. Jacobs and Mr. Roelle

Page 4

director is willing to testify that he would have voted against additional risky real estate development lending if Madison's outside auditor had generated critical audits.

Much of the loss which underlies our case is attributable to abusive insider transactions. Consequently, if Frost is able to introduce evidence of the contributory negligence of the individuals who initiated and approved these transactions, i.e., the reckless insiders and passive outsiders, we probably have only a 40% chance of proving that auditors are more than half responsible for the loss which ensued.

In response to this problem, we have asked the court to issue an order which prevents the introduction of evidence at trial of the inappropriate manner in which the Madison directors and officers managed the institution. We've based our request on a line of cases which have held that the only evidence of audit client mismanagement admissible in an accountant liability suit is evidence that the audit client provided the accountant with false financial information to audit.

This is the first time that this argument has been made in Arkansas. Last year, it was rejected in Minnesota, another state within the 8th Circuit. It's been accepted in a scattered mix of jurisdictions across the country, including a recent 10th Circuit decision which interpreted the law of Oklahoma, Arkansas' neighbor. We estimate that we have a 50% chance of winning the motion which raises this issue.

If our evidentiary motion succeeds, our chance of proving that Frost is more than half responsible for the relevant loss improves. However, Frost will do everything possible to convince the jury that the loss occurred because of events outside its control. We believe that Frost will argue that the downturn in the Arkansas economy contributed to the loss. We also believe that Frost will claim that the FHLBB contributed to the loss by accepting Madison business-plans which tolerated continued real estate development lending. Finally, Frost will attack the Arkansas regulators for failing to close Madison when it became insolvent.

We have asked the court to issue an order which prevents the introduction of evidence of regulatory contributory negligence at trial. This request is based a very strong line of cases which holds that bank and thrift regulators' duty to perform responsibly runs only to the public. It does not run to the directors, officers and other professionals affiliated with a failed institution. We are almost certain to obtain the evidentiary order which we seek on this point.

However, it was the contrast between the Frost audits and the

results of the FHLBB 1986 examination which prompted Madison to investigate audit failure. (See above.) Consequently, Frost has subpoenaed the relevant examiner and supervisory agent. Its' attorneys will certainly try to steer these individuals' testimony away from its proper purpose - confirmation that an audit failure occurred - and toward evidence of regulatory mistake. Assuming that we obtain the order which eliminates evidence of regulatory negligence from the case, we will object to this tactic. However, the jury may find the process confusing.

(In this regard, it is worth mentioning that our case is pending in a fairly widespread federal district. As a result, our jury will be drawn from both Little Rock and outlying rural areas. Consequently, there is some risk that the jury will not have the sophistication to understand the more complicated aspects of our argument.

To summarize: Assuming that we win both of our evidentiary motions, i.e., that evidence of both director/officer contributory negligence and regulatory conduct officially eliminated from the case, we have a chance of proving that auditors are more to blame for the loss which underlies this action.

Mr. Roelle is from

Arkansas

Roelle wrote this
on original.

3. Loss

Frost cannot be held responsible for loss involvement with Madison. Further, Frost is not responsible for loss recklessly incurred by Madison and that the audits were flawed. Keeping this in mind, we believe that our damage window runs from 11, 1986. The first of these dates reflects Madison's board reviewed and began to re-evaluate. The second reflects the point at which the potential flaws in Frost's conclusions from the FHLBB 1986 examination and proposed Cease and Desist. During this period, principal advances were generated approximately \$7,000,000 in loss.

Financial Analysis of Proposed Settlement

The \$3,000,000 policy issued by C&F is our recovery source.⁵ The following calculations translate the above discussion into numerical terms.

⁵ Frost is a small firm with almost insignificant resources. Absorbing the insurance policy's \$50,000 deductible will be its contribution to the settlement.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 6

First scenario:

.70 (chance of proving audit failure)
x.40 (chance of proving causation if evidence of
director/officer contributory negligence is admissible)
= .28

.28 x \$3,000,000 (insurance policy) = \$840,000

Second scenario:

.70 (chance of proving audit failure)
x.60 (chance of proving causation if evidence of director
& officer contributory negligence is not admissible)
= .42

.42 x \$3,000,000 (insurance policy) = \$1,260,000

The difference between calculations for the two scenarios
(\$1,260,000 - 840,000) = \$420,000.

\$420,000
x .50 (chance of excluding evidence of director/officer
contributory negligence by winning pending
motion)
= \$210,000

Improving \$840,000, our causation worst case scenario, by
\$210,000 to reflect our chance of winning the pending evidentiary
motion leaves us with a settlement figure of \$1,050,000.

However, because the judge is behind schedule, he may postpone
our trial. The trial of a case of this complexity will take
approximately a month. A month block of court time is not likely
to become available until the Fall of 1991. If time is allotted
for the trial itself, jury deliberation, post judgement motions,
and the court's final ruling, it becomes apparent that if the
trial is not held in March of 1990, we will not received the
proceeds of a judgement for six months to a year.

The present value of our \$1,050,000 settlement figure received in
six months is \$1,014,500. The present value of our \$1,050,000
settlement figure received in one year is \$981,308. The current
\$1,025,000 offer exceeds both.

To date, we have incurred approximately \$150,000 in legal-fees
and \$40,000 in expert fees. Final preparation and trial of this
matter is likely to add about \$75,000 in legal fees and \$10,000
in expert fees to our cost. Accepting the carrier's offer would

Memorandum to Mr. Jacobs and Mr. Roelle
Page 7

therefore enable us to save \$85,000.

Conclusion

For the foregoing reasons, I recommend that we settle this matter by accepting the carrier's \$1,025,000 offer.

CONCUR:

DTE John B. Beaty
John Beaty
Assistant General Counsel
Legal Division

Michael Martinelli
Michael Martinelli
Regional Director, RTC-Central

Gerald Jacobs by dja
Gerald Jacobs
Special Counsel to the RTC
Legal Division

William Roelle
William Roelle
Deputy Executive Director
RTC

Mr. Rosen
Mr. Thomas
Mr. Beaty

Mr. Roelle
Mr. Dudine
Mr. Eisenstein

Mr. Bracely
Ms. Bartley
Mr. Martinelli, R/D
Mr. Asbacher, SIS

TO: David Eisenstein
Senior Counsel
and
William Roelle
Director
Operations and Resolutions

FROM: April Breslaw
Senior Attorney
and
John Scott
Investigator

AAB
AAB for Tom Scott

SUBJECT: 8313 Madison Guaranty Savings and Loan Association
Little Rock, Arkansas - In Conservatorship
Termination of Directors' and Officers' Liability
Investigation

This memorandum requests your authority to terminate the Directors' and Officers' liability investigation for Madison Guaranty Savings and Loan Association ("Association") based on the following investigative findings.

The Association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the Association was a result of the administration of president and owner James B. McDougal. McDougal purchased the association February 1982. He maintained control of the association until July 1986. During the McDougal administration the association grew from \$6 million to \$123 million. The Justice Department prosecuted McDougal for bank fraud. He was acquitted in May, 1990.

The Association did not maintain directors and officers insurance. There were nine individuals who may be held culpable for the failure of the association. The Association's files contained financial statements for these individuals (see attached). The total net worth of these individuals is \$2,995,536.00 with an expected potential recovery of \$904,220.

<u>Name</u>	<u>Statement Date</u>	<u>Reported Net Worth</u>	<u>Estimated Recovery</u>
Cuffman, Stephen	8/16/88	FOIA(b)(7) - (C)	
Denton, Don	10/15/87		
Edwards, Rev. C. D.	8/15/88		
Hawkins, Sarah	8/16/88		
Latham, John	10/31/87		
McDougal, James B. & Susan H.	1/27/86		
Owen, Jack	12/10/87		
Peacock, Charles III			
	Total:		

- 1) Adjusted for homestead and personal property.
- 2) All net worth is homestead and personal property.
- 3) Adjusted value of Madison Guaranty Stock to zero.
- 4) Currently Chapter 11 bankruptcy.

003397

The potential recovery is insufficient to make a Directors' and Officers' liability claim economically justifiable. Based on the foregoing information a close-out of the Directors' and Officers' liability investigation is recommended.

CONCUR:

David Eisenstein
Senior Counsel

William Roelle
Director

Mr. Rosen
Mr. Thomas
Mr. Beaty

Mr. Roelle
Mr. Dudine
Mr. Eisenstein

Ms. Bartley
Ms. Keyes
Mr. Martinelli, R/D
Mr. Asbacher, SIS

TO: William Roelle
Director, Operations and Resolutions

and

David Eisenstein
Senior Attorney

FROM: April Breslaw
Senior Attorney

AB

SUBJECT: Madison Guaranty Savings & Loan Association
Little Rock, Arkansas
In Conservatorship #8313
Bond Claim Close-Out

This memorandum requests your authority to terminate the Bond Claim investigations for Madison Guaranty Savings & Loan Association (the association) based on the following investigative findings.

The association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the association was largely the result of the influence of James B. McDougal. McDougal purchased the association and served as its president until late 1984. It is believed that he continued to affect the operations of the association through his role in its holding company after he resigned from his management positions. This period of indirect influence seems to have occurred between late 1984 and July 1986. In any event, McDougal was the subject of a criminal referral filed by the association on March 19, 1987. There is an ongoing criminal investigation into his activities.

The association's last blanket bond expired on April 30, 1987. Renewal or replacement coverage could not be secured. Insider loans and losses caused by acts of James McDougal, his wife Susan, and John Latham were excluded from coverage. No notice or claims were ever submitted to the bond carrier.

Fidelity bonds generally provide coverage for losses caused by officers on employees. If it can be shown that a director is functioning as an officer, e.g., making specific operational decisions, it is possible to obtain bond coverage for losses caused by such a director's dishonesty. In this case, McDougal left management in 1984. While the criminal referral submitted in 1987 indicates that potentially dishonest activity was discovered during the life of the bond, such activity appears to have occurred after McDougal had lost status as an officer and was no longer covered by the

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bond. His role at the time dishonesty may have occurred would likely not be considered operational enough to merit coverage. The cost of pursuing such an approach with the bond carrier outweighs its benefit.

Based on the foregoing information a close-out of the Bond Claim is recommend.

Concurred:

David Eisenstein
Senior Counsel

William Roelle, Director
Operations and Resolutions

Chairman Seidman Mr. Jacobs
Mr. Rosen ~~Mr. Beatty~~
Mr. Thomas Mr. Roelle
Mr. Monahan Mr. Dudine
Mr. Braceley Mr. Martinelli, R/D

February 26, 1991

Memorandum To: Gerald Jacobs
 Special Counsel to the RTC

 and

 William Roelle
 Deputy Executive Director

From: April Breslaw *ARB*
 Senior Attorney

Re: 7236 Madison Guaranty Savings and Loan
 Augusta, Ark. - In Receivership

 Request for Authorization to Accept
 Settlement Offer

RECOMMENDATION

This memorandum requests authority to settle a pending accounting malpractice case by accepting the \$1,025,000 offered by Crum and Forster ("C&F"), the carrier which provided defendant Frost and Company ("Frost") with liability coverage.

C&F has not given a specific date on which its offer expires. However, our case is scheduled for trial on March 25, 1991. If authorization to accept the carrier's offer is granted by March 11, 1991, we will save the expense of the final two weeks of trial preparation. We estimate this amount to be approximately \$50,000.

¹ Past experience indicates that C&F displays more serious interest in settlement as a trial date approaches. In this case, we do not believe that C&F is aware that there is a real chance that our trial will be rescheduled for next Fall. If C&F becomes aware of this possibility, it may rescind the offer, invest the settlement funds, and resume bargaining with us in eight to ten months. Avoiding this contingency is another reason to evaluate the outstanding offer quickly.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 2

Elements of the Claim

In order to prevail, we must prove the existence of:

- (1) an audit failure
- (2) which caused
- (3) loss.

1. Audit Failure

Frost audited the Madison Guaranty Savings and Loan ("Madison") financial statements for 1984 and 1985. In each instance, an unqualified opinion, i.e., one which concluded that the statements fairly reflected the S&L's financial condition, was issued. However, the FHLBB's 1986 examination found significant deficiencies in Madison's accounting treatment of real estate development projects, subsidiary investment, and reserve for loan losses. The adjustments imposed as a result of this examination rendered Madison insolvent.

Madison subsequently retained Peat, Marwick, Main and Company to re-audit the statements first evaluated by Frost. Peat, Marwick reached two conclusions: first, that Madison's internal controls were so poor that the S&L's financial statements were virtually incapable of audit and second, that there was serious question about Madison's ability to continue as a going concern. Because these were very different conclusions that those reached in the initial audits, Madison sued Frost for malpractice.

We inherited the case when Madison was placed in conservatorship in 1989.² Investigation by in-house CPA Lee Sorenson of NCCO supports the conclusion that audit failures occurred. Most significant, Frost did not calculate Madison's loan loss reserve by performing detailed review of specific loans. Instead, Frost simply allotted one per cent of the outstanding balance of each relevant category of loans to the reserve. Further, Frost failed to test the adequacy of any of the appraisals in Madison's files and entirely based its past-due loan testwork on information provided by Madison's management. No attempt to verify this information through appraisal or financial statement data was made.

Our independent expert has testified that Frost should have evaluated the risk of loss in Madison's portfolio by classifying loans as bank examiners do. He's further testified that Laventhol and Horwath ("L&H"), the firm with which he was a partner until its recent bankruptcy, employed this approach to

² Since "final resolution" in October of 1990, we have pursued the claim on behalf of RTC Corporate.
The Ombudsman (URS-16305) DocId: 70105134 Page 200

Memorandum to Mr. Jacobs and Mr. Roelle
Page 3

bank and S&L audits as a standard practice.

Unfortunately, our expert has only been able to produce documentation which shows that L&H routinely handled bank audits in this manner. He has not been able to document standard practice for S&L audits.³ Further, Frost's attorneys have discovered an S&L audit performed by another L&H partner at about the same time as those at stake in this case in which a different method of evaluating risk of loss was employed. If the case is tried, Frost's attorneys will certainly use these inconsistencies to attack the credibility of our expert.

It is, however, worth noting that the relevant accounting standards do not require that an auditor use any specific method of evaluating risk of loan loss. Instead, they require only that a method be used which considers the overall circumstances surrounding the tested transactions. In its re-audit of Madison, Peat Marwick used a different method than the one recommended by our expert, but reached the same conclusions. Because Frost did not employ any such method, we should be able to prove that its audits are flawed - regardless of the problems with our expert's testimony. Overall, our chance of prevailing on this element of the case is approximately 70 per cent.

2. Causation

In any accounting malpractice case, we must show that the relevant S&L relied on the flawed audits to make subsequent business decisions. Put another way, we must show that but for its reliance on flawed audits, the S&L would have stopped or slowed investment in the speculative projects which ultimately caused loss. In an Arkansas malpractice case, we must show that in comparison with other possible causes, the defendant auditor was more than 50% responsible for the loss which resulted from its flawed audits.

In this case, we will have a series of problems demonstrating that Madison relied on the audits to make decisions. First, Madison CEO John Latham plead guilty to bank fraud charges last Spring. It is highly unlikely that different audits would have influenced his decision making. Second, Madison's board of directors was passive. For the most part, it did what Latham and primary shareholder McDougal told it to do.⁴ Even today, only one

³ Contrary to our expert's initial testimony, it appears that L&H did not have a standard approach to S&L audits.

⁴ McDougal was tried for bank fraud last Spring. Mainly through prosecutorial error, he was acquitted.

Memorandum to Mr. Jacobs and Mr. Roelle

Page 4

director is willing to testify that he would have voted against additional risky real estate development lending if Madison's outside auditor had generated critical audits.

Much of the loss which underlies our case is attributable to abusive insider transactions. Consequently, if Frost is able to introduce evidence of the contributory negligence of the individuals who initiated and approved these transactions, i.e., the reckless insiders and passive outsiders, we probably have only a 40% chance of proving that auditors are more than half responsible for the loss which ensued.

In response to this problem, we have asked the court to issue an order which prevents the introduction of evidence at trial of the inappropriate manner in which the Madison directors and officers managed the institution. We've based our request on a line of cases which have held that the only evidence of audit client mismanagement admissible in an accountant liability suit is evidence that the audit client provided the accountant with false financial information to audit.

This is the first time that this argument has been made in Arkansas. Last year, it was rejected in Minnesota, another state within the 8th Circuit. It's been accepted in a scattered mix of jurisdictions across the country, including a recent 10th Circuit decision which interpreted the law of Oklahoma, Arkansas' neighbor. We estimate that we have a 50% chance of winning the motion which raises this issue.

If our evidentiary motion succeeds, our chance of proving that Frost is more than half responsible for the relevant loss improves. However, Frost will do everything possible to convince the jury that the loss occurred because of events outside its control. We believe that Frost will argue that the downturn in the Arkansas economy contributed to the loss. We also believe that Frost will claim that the FHLBB contributed to the loss by accepting Madison business-plans which tolerated continued real estate development lending. Finally, Frost will attack the Arkansas regulators for failing to close Madison when it became insolvent.

We have asked the court to issue an order which prevents the introduction of evidence of regulatory contributory negligence at trial. This request is based a very strong line of cases which holds that bank and thrift regulators' duty to perform responsibly runs only to the public. It does not run to the directors, officers and other professionals affiliated with a failed institution. We are almost certain to obtain the evidentiary order which we seek on this point.

However, it was the contrast between the Frost audits and the

Memorandum to Mr. Jacobs and Mr. Roelle
Page 5

results of the FHLBB 1986 examination which prompted Madison to investigate audit failure. (See above.) Consequently, Frost has subpoenaed the relevant examiner and supervisory agent. Its attorneys will certainly try to steer these individuals' testimony away from its proper purpose - confirmation that an audit failure occurred - and toward evidence of regulatory mistake. Assuming that we obtain the order which eliminates evidence of regulatory negligence from the case, we will object to this tactic. However, the jury may find the process confusing.

(In this regard, it is worth mentioning that our case is pending in a fairly widespread federal district. As a result, our jury will be drawn from both Little Rock and outlying rural areas. Consequently, there is some risk that the jury will not have the sophistication to understand the more complicated aspects of our argument.

we Roelle is from

To summarize: Assuming that we win both of our evidentiary motions, i.e., that evidence of both director/officer contributory negligence and regulatory contributory negligence is officially eliminated from the case, we have approximately a 60% chance of proving that auditors are more than half responsible for the loss which underlies this action.

ARKANSAS

3. Loss

Frost cannot be held responsible for loss incurred prior to its involvement with Madison. Further, Frost cannot be held liable for loss recklessly incurred by Madison after it was notified that the audits were flawed. Keeping these parameters in mind, we believe that our damage window runs from July 18, 1985 to July 11, 1986. The first of these dates reflects the point at which Madison's board reviewed and began to rely on the 1984 audit. The second reflects the point at which the board was notified of potential flaws in Frost's conclusions through receipt of the FHLBB 1986 examination and proposed Cease and Desist Order. During this period, principal advances were made which have generated approximately \$7,000,000 in loss.

Financial Analysis of Proposed Settlement

The \$3,000,000 policy issued by C&F is our recovery source.⁵ The following calculations translate the above discussion into numerical terms.

⁵ Frost is a small firm with almost insignificant resources. Absorbing the insurance policy's \$50,000 deductible will be its contribution to the settlement.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 6

First scenario:

.70 (chance of proving audit failure)
x.40 (chance of proving causation if evidence of
director/officer contributory negligence is admissible)
= .28

.28 x \$3,000,000 (insurance policy) = \$840,000

Second scenario:

.70 (chance of proving audit failure)
x.60 (chance of proving causation if evidence of director
& officer contributory negligence is not admissible)
= .42

.42 x \$3,000,000 (insurance policy) = \$1,260,000

The difference between calculations for the two scenarios
(\$1,260,000 - 840,000) = \$420,000.

\$420,000
x .50 (chance of excluding evidence of director/officer
contributory negligence by winning pending
motion)
= \$210,000

Improving \$840,000, our causation worst case scenario, by
\$210,000 to reflect our chance of winning the pending evidentiary
motion leaves us with a settlement figure of \$1,050,000.

However, because the judge is behind schedule, he may postpone
our trial. The trial of a case of this complexity will take
approximately a month. A month block of court time is not likely
to become available until the Fall of 1991. If time is allotted
for the trial itself, jury deliberation, post judgement motions,
and the court's final ruling, it becomes apparent that if the
trial is not held in March of 1990, we will not received the
proceeds of a judgement for six months to a year.

The present value of our \$1,050,000 settlement figure received in
six months is \$1,014,500. The present value of our \$1,050,000
settlement figure received in one year is \$981,308. The current
\$1,025,000 offer exceeds both.

To date, we have incurred approximately \$150,000 in legal fees
and \$40,000 in expert fees. Final preparation and trial of this
matter is likely to cost \$100,000 and \$10,000
in expert fees to our cost. Accepting the carrier's offer would

Memorandum to Mr. Jacobs and Mr. Roelle
Page 7

therefore enable us to save \$85,000.

Conclusion

For the foregoing reasons, I recommend that we settle this matter by accepting the carrier's \$1,025,000 offer.

CONCUR:

DAE John B. Beaty
John Beaty
Assistant General Counsel
Legal Division

Thomas J. Thompson for
Michael Martinelli
Regional Director, RTC-Central

Gerald Jacobs by dja
Gerald Jacobs
Special Counsel to the RTC
Legal Division

William Roelle
William Roelle
Deputy Executive Director
RTC



Resolution Trust Corporation


P.O. Box 1336, Burnsville, MN 55337 · (612) 894-0800

Mr. Byrne
Mr. Douglas
Mr. Rosen

Ms. Bartley
Ms. Wood
Mr. Martinelli, Regional Director
Mr. Asbacher, SLS/Investigations

DATE: January 18, 1990

TO: Cecil Underwood, Assistant General Counsel
and
William Roelle, Director/Resolutions and Operations
Federal Deposit Insurance Corporation
550 - 17th Street N.W.
Washington, D.C. 20429

FROM: Robert H. Asbacher 
SLS/Kansas City Regional Office

PREPARED BY: Lee B. Sorenson
Investigator
North Central Consolidated Office

SUBJECT: Madison Guaranty Savings & Loan Association
Little Rock, Arkansas
In Conservatorship #8313
Bond Claim Close-Out

This memorandum requests your authority to terminate the Bond Claim investigations for Madison Guaranty Savings & Loan Association (the association) based on the following investigative findings.

The association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the association was a result of the administration of President and Owner James B. McDougal. McDougal purchased the association February 1982 and maintained control of the association until July 1986. During the McDougal administration the association grew from \$6 million to \$123 million. McDougal was the subject of a criminal referral filed by the association on March 19, 1987, there is an ongoing criminal investigation into his action.

The association's last blanket bond expired on April 30, 1987. It was a Financial Institution's Special Bond. Renewal or replacement coverage could not be secured. Insider loans; as well as acts of James McDougal, his wife Susan, and John Latham; were excluded from coverage. No notice or claims were ever filed on the bond.

Page two
January 18, 1990
Madison Guaranty S&L Association, Little Rock, AR
Bond Claim Close-Out

Based on the foregoing information a close-out of the Bond Claim is recommended.

Approved:

Cecil Underwood Date
Assistant General Counsel

William Roelle Date
Director, Resolutions and
Operations Division

James G. Thompson, Jr.

James G. Thompson, Jr.
Deputy Regional Director
Resolutions/Operations
Central Region

2-1-90

Date

16201



Federal Deposit Insurance Corporation

Privileged and Confidential

P.O. Box 1336 • Burnsville, MN 55337 • (612) 894-0800




Mr. Byrne
Mr. Douglas
Mr. Rosen

Ms. Bartley
Ms. Wood
Mr. Martinelli, Regional Director

DATE: October 18, 1989

TO: John Thomas, Associate General Counsel
and
William Roelle, Director/Resolutions and Operations
Federal Deposit Insurance Corporation
550 - 17th Street N.W.
Washington, D.C. 20429

FROM: Robert Asbacher 
SLS/Investigations
Kansas City Regional Office

PREPARED BY: Liquidation Assistant/Investigations
Burnsville RTC Consolidated Office
Burnsville, Minnesota

SUBJECT: Madison Guaranty Savings and Loan Association
Little Rock, Arkansas
In Conservatorship 8313
Directors' and Officers' Claim Close-Out

This memorandum requests your authority to terminate the Directors' and Officers' Claim investigation for Madison Guaranty Savings and Loan Association (the association) based on the following investigative findings.

The association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the association was a result of the administration of president and owner James B. McDougal. McDougal purchased the association February 1982, he maintained control of the association until July 1986. During the McDougal administration the association grew from \$6 million to \$123 million. McDougal was the subject of a criminal referral filed by the association on March 19, 1987, there is an ongoing criminal investigation into his actions.

The association did not maintain any directors' and officers' insurance. There were nine individuals who may be held culpable for the failure of the association. The association's files contained financial statements for these individuals (see attached). The total net worth of these individuals is \$2,995,536.00 with an expected potential recovery of \$904,220.

John Thomas, Associate General Counsel
William Roelle, Director/Resolutions and Operations
Madison Guaranty S&L Association, Little Rock, AR - #8313
Directors' and Officers' Claim Close-Out

<u>Name</u>	<u>Statement Date</u>	<u>Reported Net Worth</u>	<u>Estimated Recovery</u>
Cuffman, Stephen	8/16/88	FOIA(b)(7) - (C)	
Denton, Don	10/15/87		
Edwards, Rev. C. D.	8/15/88		
Hawkins, Sarah	8/16/88		
Latham, John	10/31/87		
McDougal, James B. & Susan H.	1/27/86		
Owen, Jack	12/10/87		
Peacock, Charles III			
	TOTAL:		

- 1) Adjusted for homestead and personal property.
- 2) All net worth is homestead and personal property.
- 3) Adjusted value of Madison Guaranty stock to zero.
- 4) Currently in Chapter 11 bankruptcy.

The potential recovery is insufficient to make a Directors' and Officers' claim economically justifiable. Based on the foregoing information a close-out of the Directors' and Officers' claim is recommended.

Concurred:

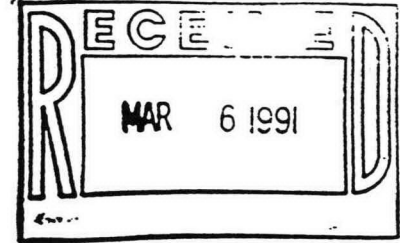
April A. Breslaw, Attorney

Approved:

John Thomas
Associate General Counsel

William Roelle, Director,
Resolutions and Operations

March 5, 1991



TO: James Thompson
Assistant Regional Director

FROM: John B. Beaty *JB*
Assistant General Counsel

RE: 7236 Madison Guaranty Savings
Augusta Arkansas - In receivership

Request for Authorization to Settle

The enclosed memorandum seeks authority to settle an accounting malpractice claim against Frost and Company, the former auditors of Madison Guaranty Savings, Augusta Arkansas. It has been forwarded to you for signature because Regional Director Martinelli is out of town.

The request has been reviewed for legal merit and is being submitted to you for review as a business decision. Of particular interest may be the last pages of the memorandum which contain a financial analysis of the proposed settlement. The investigator in Eagan Minnesota and his supervisors have reviewed the accuracy of the factual underpinnings of the memorandum, and they agree that the settlement is advantageous. The Regional Counsel has been provided opportunity to review the memo for impact on other legal work in the region.

If you concur in the recommendation, please sign and return the original of the memorandum to me at 1775 K Street, NW, 6th Floor, Washington, D.C. 20006 by overnight mail. If you have questions or concerns, please feel free to contact the Kansas City PLS Counsel Julie Yanda, who is familiar with this matter.

cc: E. Glion Curtis, Regional Counsel (w/encl.)
Robert Asbacher, SIS (w/enclosure)

Chairman Seidman Mr. Jacobs
Mr. Rosen Mr. Beaty
Mr. Thomas Mr. Roelle
Mr. Monahan Mr. Dudine
Mr. Braceley Mr. Martinelli, R/D

February 26, 1991

Memorandum To: Gerald Jacobs
 Special Counsel to the RTC

and

William Roelle
Deputy Executive Director

From: April Breslaw *AB*
 Senior Attorney

Re: 7236 Madison Guaranty Savings and Loan
 Augusta, Ark. - In Receivership

Request for Authorization to Accept
Settlement Offer

RECOMMENDATION

This memorandum requests authority to settle a pending accounting malpractice case by accepting the \$1,025,000 offered by Crum and Forster ("C&F"), the carrier which provided defendant Frost and Company ("Frost") with liability coverage.

C&F has not given a specific date on which its offer expires. However, our case is scheduled for trial on March 25, 1991. If authorization to accept the carrier's offer is granted by March 11, 1991, we will save the expense of the final two weeks of trial preparation. We estimate this amount to be approximately \$50,000.¹

¹ Past experience indicates that C&F displays more serious interest in settlement as a trial date approaches. In this case, we do not believe that C&F is aware that there is a real chance that our trial will be rescheduled for next Fall. If C&F becomes aware of this possibility, it may rescind the offer, invest the settlement funds, and resume bargaining with us in eight to ten months. Avoiding this contingency is another reason to evaluate the outstanding offer quickly.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 2

Elements of the Claim

In order to prevail, we must prove the existence of:

- (1) an audit failure
- (2) which caused
- (3) loss.

1. Audit Failure

Frost audited the Madison Guaranty Savings and Loan ("Madison") financial statements for 1984 and 1985. In each instance, an unqualified opinion, i.e., one which concluded that the statements fairly reflected the S&L's financial condition, was issued. However, the FHLBB's 1986 examination found significant deficiencies in Madison's accounting treatment of real estate development projects, subsidiary investment, and reserve for loan losses. The adjustments imposed as a result of this examination rendered Madison insolvent.

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We inherited the case when Madison was placed in conservatorship in 1989.² Investigation by in-house CPA Lee Sorenson of NCCO supports the conclusion that audit failures occurred. Most significant, Frost did not calculate Madison's loan loss reserve by performing detailed review of specific loans. Instead, Frost simply allotted one per cent of the outstanding balance of each relevant category of loans to the reserve. Further, Frost failed to test the adequacy of any of the appraisals in Madison's files and entirely based its past-due loan testwork on information provided by Madison's management. No attempt to verify this information through appraisal or financial statement data was made.

Our independent expert has testified that Frost should have evaluated the risk of loss in Madison's portfolio by classifying loans as bank examiners do. He's further testified that Laventhol and Horwath ("L&H"), the firm with which he was a partner until its recent bankruptcy, employed this approach to

² Since "final resolution" in October of 1990, we have pursued the matter on behalf of RTC Corporate.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 3

bank and S&L audits as a standard practice.

Unfortunately, our expert has only been able to produce documentation which shows that L&H routinely handled bank audits in this manner. He has not been able to document standard practice for S&L audits.³ Further, Frost's attorneys have discovered an S&L audit performed by another L&H partner at about the same time as those at stake in this case in which a different method of evaluating risk of loss was employed. If the case is tried, Frost's attorneys will certainly use these inconsistencies to attack the credibility of our expert.

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2. Causation

In any accounting malpractice case, we must show that the relevant S&L relied on the flawed audits to make subsequent business decisions. Put another way, we must show that but for its reliance on flawed audits, the S&L would have stopped or slowed investment in the speculative projects which ultimately caused loss. In an Arkansas malpractice case, we must show that in comparison with other possible causes, the defendant auditor was more than 50% responsible for the loss which resulted from its flawed audits.

In this case, we will have a series of problems demonstrating that Madison relied on the audits to make decisions. First, Madison CEO John Latham plead guilty to bank fraud charges last Spring. It is highly unlikely that different audits would have influenced his decision making. Second, Madison's board of directors was passive. For the most part, it did what Latham and primary shareholder McDougal told it to do.⁴ Even today, only one

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Memorandum to Mr. Jacobs and Mr. Roelle
Page 4

director is willing to testify that he would have voted against additional risky real estate development lending if Madison's outside auditor had generated critical audits.

Much of the loss which underlies our case is attributable to abusive insider transactions. Consequently, if Frost is able to introduce evidence of the contributory negligence of the individuals who initiated and approved these transactions, i.e., the reckless insiders and passive outsiders, we probably have only a 40% chance of proving that auditors are more than half responsible for the loss which ensued.

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We have asked the court to issue an order which prevents the introduction of evidence of regulatory contributory negligence at trial. This request is based a very strong line of cases which holds that bank and thrift regulators' duty to perform responsibly runs only to the public. It does not run to the directors, officers and other professionals affiliated with a failed institution. We are almost certain to obtain the evidentiary order which we seek on this point.

However, it was the contrast between the Frost audits and the

Memorandum to Mr. Jacobs and Mr. Roelle
Page 5

results of the FHLBB 1986 examination which prompted Madison to investigate audit failure. (See above.) Consequently, Frost has subpoenaed the relevant examiner and supervisory agent. Its' attorneys will certainly try to steer these individuals' testimony away from its proper purpose - confirmation that an audit failure occurred - and toward evidence of regulatory mistake. Assuming that we obtain the order which eliminates evidence of regulatory negligence from the case, we will object to this tactic. However, the jury may find the process confusing.

In this regard, it is worth mentioning that our case is pending in a fairly widespread federal district. As a result, our jury will be drawn from both Little Rock and outlying rural areas. Consequently, there is some risk that the jury will not have the sophistication to understand the more complicated aspects of our argument.

To summarize: Assuming that we win both of our evidentiary motions, i.e., that evidence of both director/officer contributory negligence and regulatory contributory negligence is officially eliminated from the case, we have approximately a 60% chance of proving that auditors are more than half responsible for the loss which underlies this action.

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Financial Analysis of Proposed Settlement

The \$3,000,000 policy issued by C&F is our recovery source.⁵ The following calculations translate the above discussion into numerical terms.

⁵ Frost is a small firm with almost insignificant resources. Absorbing the insurance policy's \$50,000 deductible will be its contribution to the settlement.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 6

First scenario:

.70 (chance of proving audit failure)
x.40 (chance of proving causation if evidence of
director/officer contributory negligence is admissible)
= .28
.28 x \$3,000,000 (insurance policy) = \$840,000

Second scenario:

.70 (chance of proving audit failure)
x.60 (chance of proving causation if evidence of director
& officer contributory negligence is not admissible)
= .42
.42 x \$3,000,000 (insurance policy) = \$1,260,000

The difference between calculations for the two scenarios
(\$1,260,000 - 840,000) = \$420,000.

\$420,000
x .50 (chance of excluding evidence of director/officer
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motion)
= \$210,000

Improving \$840,000, our causation worst case scenario, by
\$210,000 to reflect our chance of winning the pending evidentiary
motion leaves us with a settlement figure of \$1,050,000.

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our trial. The trial of a case of this complexity will take
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proceeds of a judgement for six months to a year.

The present value of our \$1,050,000 settlement figure received in
six months is \$1,014,500. The present value of our \$1,050,000
settlement figure received in one year is \$981,308. The current
\$1,025,000 offer exceeds both.

To date, we have incurred approximately \$150,000 in legal fees
and \$40,000 in expert fees. Final preparation and trial of this
matter is likely to add about \$75,000 in legal fees and \$10,000
in expert fees to our cost. Accepting the carrier's offer would

Memorandum to Mr. Jacobs and Mr. Roelle
Page 7

therefore enable us to save \$85,000.

Conclusion

For the foregoing reasons, I recommend that we settle this matter by accepting the carrier's \$1,025,000 offer.

CONCUR:

WJE John B. Beaty

John Beaty
Assistant General Counsel
Legal Division

James H. Thompson for

Michael Martinelli
Regional Director, RTC-Central

Gerald Jacobs
Special Counsel to the RTC
Legal Division

William Roelle
Deputy Executive Director
RTC

RTC Production -- Roelle

16-Feb-95

Bates #	Source	Date	Description
19781979	WDC PLS	1/1/95	Undated draft from Breslaw to Roelle and Eisenstein re: Madison Bond Claim Close-Out (N/A)
20452051	WDC PLS	2/26/94	memo from Breslaw to Jacobs and Roelle (cc: Seidman, Rosen, Thomas, Monahan, Braceley, Jacobs, Beaty, Roelle; Dudine and Martinelli) re: Request for authorization to Accept Settlement Offer from Frost for \$1,025,000 (signed copy) (N/A)
33973398	WDC RTC	1/1/95	Undated unsigned memo from Breslaw and Scott to Eisenstein and Roelle (cc: Rosen, Thomas, Beaty, Roelle; Dudine, Eisenstein, Braceley, Bartley, Martinelli, and Asbacher) re: Termination of D&O Liability Investigation (N/A)
33993400	WDC RTC	1/1/95	Undated unsigned memo from Breslaw to Eisenstein and Roelle (cc: Rosen, Thomas, Beaty, Roelle; Dudine, Eisenstein, Braceley, Bartley, Martinelli, and Asbacher) re: Bond Claim Close-Out (N/A)
34013407	WDC RTC	2/26/91	memo from Breslaw to Jacobs and Roelle (cc: Seidman, Rosen, Thomas, Monahan, Braceley, Jacobs, Roelle; Dudine and Martinelli) re: Request for Authorization to Accept Settlement Offer (N/A)
37973798	WDC RTC	10/18/89	memo from Asbacher to Thomas and Roelle (cc: Byrne, Douglas, Rosen, Bartley, Wood and Martinelli) re: Madison D&O Claim Close-out (N/A)
37993800	WDC RTC	1/18/90	memo from Asbacher prepared by Sorenson to Underwood and Roelle (cc: Byrne, Douglas, Rosen, Bartley, Wood, Martinelli and Asbacher) re: Madison Bond Claim Close-out (N/A)
38083815	WDC RTC	3/5/91	memo from Beaty to Thompson (cc: Curtis and Asbacher) re: attached 02/26/91 memo from Breslaw to Jacobs and Roelle (cc: Seidman, Rosen, Thomas, Monahan, Braceley, Jacobs, Beaty, Roelle; Dudine, and Martinelli) re: request for Authorization to Accept Settl

Mr. Rosen
Mr. Thomas
Mr. Beaty

Mr. Roelle
Mr. Dudine
Mr. Eisenstein

Ms. Bartley
Ms. Keyes
Mr. Martinelli, R/D
Mr. Asbacher, SIS

TO: William Roelle
Director, Operations and Resolutions

and

David Eisenstein
Senior Attorney

FROM: April Breslaw *AB*
Senior Attorney

SUBJECT: Madison Guaranty Savings & Loan Association
Little Rock, Arkansas
In Conservatorship #8313
Bond Claim Close-Out

This memorandum requests your authority to terminate the Bond Claim investigations for Madison Guaranty Savings & Loan Association (the association) based on the following investigative findings.

The association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the association was largely the result of the influence of James B. McDougal. McDougal purchased the association and served as its president until late 1984. It is believed that he continued to affect the operations of the association through his role in its holding company after he resigned from his management positions. This period of indirect influence seems to have occurred between late 1984 and July 1986. In any event, McDougal was the subject of a criminal referral filed by the association on March 19, 1987. There is an ongoing criminal investigation into his activities.

The association's last blanket bond expired on April 30, 1987. Renewal or replacement coverage could not be secured. Insider loans and losses caused by acts of James McDougal, his wife Susan, and John Latham were excluded from coverage. No notice or claims were ever submitted to the bond carrier.

Fidelity bonds generally provide coverage for losses caused by officers on employees. If it can be shown that a director is functioning as an officer, e.g., making specific operational decisions, it is possible to obtain bond coverage for losses caused by such a director's dishonesty. In this case, McDougal left management in 1984. While the criminal referral submitted in 1987 indicates that potentially dishonest activity was discovered during the life of the bond, such activity appears to have occurred after McDougal had lost status as an officer directly covered by the

bond. His role at the time dishonesty may have occurred would likely not be considered operational enough to merit coverage. The cost of pursuing such an approach with the bond carrier outweighs its benefit.

Based on the foregoing information a close-out of the Bond Claim is recommend.

Concurred:

David Eisenstein
Senior Counsel

William Roelle, Director
Operations and Resolutions

Chairman Seidman
Mr. Rosen
Mr. Thomas
Mr. Monahan
Mr. Braceley

Mr. Jacobs
~~Mr. Beatty~~
Mr. Roelle
Mr. Dudine
Mr. Martinelli, R/D

February 26, 1991

Memorandum To: Gerald Jacobs
Special Counsel to the RTC

and

William Roelle
Deputy Executive Director

From: April Breslaw *AB*
Senior Attorney

Re: 7236 Madison Guaranty Savings and Loan
Augusta, Ark. - In Receivership

Request for Authorization to Accept
Settlement Offer

RECOMMENDATION

This memorandum requests authority to settle a pending accounting malpractice case by accepting the \$1,025,000 offered by Crum and Forster ("C&F"), the carrier which provided defendant Frost and Company ("Frost") with liability coverage.

C&F has not given a specific date on which its offer expires. However, our case is scheduled for trial on March 25, 1991. If authorization to accept the carrier's offer is granted by March 11, 1991, we will save the expense of the final two weeks of trial preparation. We estimate this amount to be approximately \$50,000.

¹ Past experience indicates that C&F displays more serious interest in settlement as a trial date approaches. In this case, we do not believe that C&F is aware that there is a real chance that our trial will be rescheduled for next Fall. If C&F becomes aware of this possibility, it may rescind the offer, invest the settlement funds, and resume bargaining with us in eight to ten months. Avoiding this contingency is another reason to evaluate the outstanding offer quickly.

Elements of the Claim

In order to prevail, we must prove the existence of:

- (1) an audit failure
- (2) which caused
- (3) loss.

1. Audit Failure

Frost audited the Madison Guaranty Savings and Loan ("Madison") financial statements for 1984 and 1985. In each instance, an unqualified opinion, i.e., one which concluded that the statements fairly reflected the S&L's financial condition, was issued. However, the FHLBB's 1986 examination found significant deficiencies in Madison's accounting treatment of real estate development projects, subsidiary investment, and reserve for loan losses. The adjustments imposed as a result of this examination rendered Madison insolvent.

Madison subsequently retained Peat, Marwick, Main and Company to re-audit the statements first evaluated by Frost. Peat, Marwick reached two conclusions: first, that Madison's internal controls were so poor that the S&L's financial statements were virtually incapable of audit and second, that there was serious question about Madison's ability to continue as a going concern. Because these were very different conclusions that those reached in the initial audits, Madison sued Frost for malpractice.

We inherited the case when Madison was placed in conservatorship in 1989.² Investigation by in-house CPA Lee Sorenson of NCCO supports the conclusion that audit failures occurred. Most significant, Frost did not calculate Madison's loan loss reserve by performing detailed review of specific loans. Instead, Frost simply allotted one per cent of the outstanding balance of each relevant category of loans to the reserve. Further, Frost failed to test the adequacy of any of the appraisals in Madison's files and entirely based its past-due loan testwork on information provided by Madison's management. No attempt to verify this information through appraisal or financial statement data was made.

Our independent expert has testified that Frost should have evaluated the risk of loss in Madison's portfolio by classifying loans as bank examiners do. He's further testified that Laventhol and Horwath ("L&H"), the firm with which he was a partner until its recent bankruptcy, employed this approach to

² Since "final resolution" in October of 1990, we have pursued the matter on behalf of RTC Corporate.

bank and S&L audits as a standard practice.

Unfortunately, our expert has only been able to produce documentation which shows that L&H routinely handled bank audits in this manner. He has not been able to document standard practice for S&L audits.³ Further, Frost's attorneys have discovered an S&L audit performed by another L&H partner at about the same time as those at stake in this case in which a different method of evaluating risk of loss was employed. If the case is tried, Frost's attorneys will certainly use these inconsistencies to attack the credibility of our expert.

It is, however, worth noting that the relevant accounting standards do not require that an auditor use any specific method of evaluating risk of loan loss. Instead, they require only that a method be used which considers the overall circumstances surrounding the tested transactions. In its re-audit of Madison, Peat Marwick used a different method than the one recommended by our expert, but reached the same conclusions. Because Frost did not employ any such method, we should be able to prove that its audits are flawed - regardless of the problems with our expert's testimony. Overall, our chance of prevailing on this element of the case is approximately 70 per cent.

2. Causation

In any accounting malpractice case, we must show that the relevant S&L relied on the flawed audits to make subsequent business decisions. Put another way, we must show that but for its reliance on flawed audits, the S&L would have stopped or slowed investment in the speculative projects which ultimately caused loss. In an Arkansas malpractice case, we must show that in comparison with other possible causes, the defendant auditor was more than 50% responsible for the loss which resulted from its flawed audits.

In this case, we will have a series of problems demonstrating that Madison relied on the audits to make decisions. First, Madison CEO John Latham plead guilty to bank fraud charges last Spring. It is highly unlikely that different audits would have influenced his decision making. Second, Madison's board of directors was passive. For the most part, it did what Latham and primary shareholder McDougal told it to do.⁴ Even today, only one

³ Contrary to our expert's initial testimony, it appears that L&H did not have a standard approach to S&L audits.

⁴ McDougal was tried for bank fraud last Spring. Mainly through prosecutorial error, he was acquitted.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 4

director is willing to testify that he would have voted against additional risky real estate development lending if Madison's outside auditor had generated critical audits.

Much of the loss which underlies our case is attributable to abusive insider transactions. Consequently, if Frost is able to introduce evidence of the contributory negligence of the individuals who initiated and approved these transactions, i.e., the reckless insiders and passive outsiders, we probably have only a 40% chance of proving that auditors are more than half responsible for the loss which ensued.

In response to this problem, we have asked the court to issue an order which prevents the introduction of evidence at trial of the inappropriate manner in which the Madison directors and officers managed the institution. We've based our request on a line of cases which have held that the only evidence of audit client mismanagement admissible in an accountant liability suit is evidence that the audit client provided the accountant with false financial information to audit.

This is the first time that this argument has been made in Arkansas. Last year, it was rejected in Minnesota, another state within the 8th Circuit. It's been accepted in a scattered mix of jurisdictions across the country, including a recent 10th Circuit decision which interpreted the law of Oklahoma, Arkansas' neighbor. We estimate that we have a 50% chance of winning the motion which raises this issue.

If our evidentiary motion succeeds, our chance of proving that Frost is more than half responsible for the relevant loss improves. However, Frost will do everything possible to convince the jury that the loss occurred because of events outside its control. We believe that Frost will argue that the downturn in the Arkansas economy contributed to the loss. We also believe that Frost will claim that the FHLBB contributed to the loss by accepting Madison business-plans which tolerated continued real estate development lending. Finally, Frost will attack the Arkansas regulators for failing to close Madison when it became insolvent.

We have asked the court to issue an order which prevents the introduction of evidence of regulatory contributory negligence at trial. This request is based a very strong line of cases which holds that bank and thrift regulators' duty to perform responsibly runs only to the public. It does not run to the directors, officers and other professionals affiliated with a failed institution. We are almost certain to obtain the evidentiary order which we seek on this point.

However, it was the contrast between the Frost audits and the
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Memorandum to Mr. Jacobs and Mr. Roelle
Page 5

results of the FHLBB 1986 examination which prompted Madison to investigate audit failure. (See above.) Consequently, Frost has subpoenaed the relevant examiner and supervisory agent. Its attorneys will certainly try to steer these individuals' testimony away from its proper purpose - confirmation that an audit failure occurred - and toward evidence of regulatory mistake. Assuming that we obtain the order which eliminates evidence of regulatory negligence from the case, we will object to this tactic. However, the jury may find the process confusing.

(In this regard, it is worth mentioning that our case is pending in a fairly widespread federal district. As a result, our jury will be drawn from both Little Rock and outlying rural areas. Consequently, there is some risk that the jury will not have the sophistication to understand the more complicated aspects of our argument.

To summarize: Assuming that we win both of our evidentiary motions, i.e., that evidence of both director/officer contributory negligence and regulatory conduct officially eliminated from the case, we have a chance of proving that auditors are more responsible for the loss which underlies this action.

Mr. Roelle is from

Arkansas

Roelle wrote this
on original.

3. Loss

Frost cannot be held responsible for loss involvement with Madison. Further, Frost is responsible for loss recklessly incurred by Madison and that the audits were flawed. Keeping this in mind, we believe that our damage window runs from 11, 1986. The first of these dates reflects Madison's board reviewed and began to re-evaluate. The second reflects the point at which the potential flaws in Frost's conclusions of the FHLBB 1986 examination and proposed Cease and Desist. During this period, principal advances were generated approximately \$7,000,000 in loss.

Financial Analysis of Proposed Settlement

The \$3,000,000 policy issued by C&F is our recovery source.⁵ The following calculations translate the above discussion into numerical terms.

⁵ Frost is a small firm with almost insignificant resources. Absorbing the insurance policy's \$50,000 deductible will be its contribution to the settlement.

Memorandum to Mr. Jacobs and Mr. Roelle

Page 6

First scenario:

.70 (chance of proving audit failure)
x.40 (chance of proving causation if evidence of
director/officer contributory negligence is admissible)
= .28

.28 x \$3,000,000 (insurance policy) = \$840,000

Second scenario:

.70 (chance of proving audit failure)
x.60 (chance of proving causation if evidence of director
& officer contributory negligence is not admissible)
= .42

.42 x \$3,000,000 (insurance policy) = \$1,260,000

The difference between calculations for the two scenarios
(\$1,260,000 - 840,000) = \$420,000.

\$420,000
x .50 (chance of excluding evidence of director/officer
contributory negligence by winning pending
motion)
= \$210,000

Improving \$840,000, our causation worst case scenario, by
\$210,000 to reflect our chance of winning the pending evidentiary
motion leaves us with a settlement figure of \$1,050,000.

However, because the judge is behind schedule, he may postpone
our trial. The trial of a case of this complexity will take
approximately a month. A month block of court time is not likely
to become available until the Fall of 1991. If time is allotted
for the trial itself, jury deliberation, post judgement motions,
and the court's final ruling, it becomes apparent that if the
trial is not held in March of 1990, we will not received the
proceeds of a judgement for six months to a year.

The present value of our \$1,050,000 settlement figure received in
six months is \$1,014,500. The present value of our \$1,050,000
settlement figure received in one year is \$981,308. The current
\$1,025,000 offer exceeds both.

To date, we have incurred approximately \$150,000 in legal-fees
and \$40,000 in expert fees. Final preparation and trial of this
matter is likely to add about \$75,000 in legal fees and \$10,000
in expert fees to our cost. Accepting the carrier's offer would

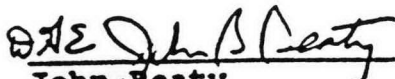
Memorandum to Mr. Jacobs and Mr. Roelle
Page 7

therefore enable us to save \$85,000.

Conclusion

For the foregoing reasons, I recommend that we settle this matter by accepting the carrier's \$1,025,000 offer.

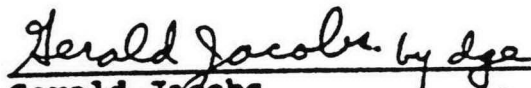
CONCUR:



John Beaty
Assistant General Counsel
Legal Division



Michael Martinelli
Regional Director, RTC-Central



Gerald Jacobs
Special Counsel to the RTC
Legal Division



William Roelle
Deputy Executive Director
RTC

Mr. Rosen
Mr. Thomas
Mr. Beaty

Mr. Roelle
Mr. Dudine
Mr. Eisenstein

Mr. Bracely
Ms. Bartley
Mr. Martinelli, R/D
Mr. Asbacher, SIS

TO: David Eisenstein
Senior Counsel
and
William Roelle
Director
Operations and Resolutions

FROM: April Breslaw
Senior Attorney *AAB*
and
John Scott *AAB for John Scott*
Investigator

SUBJECT: 8313 Madison Guaranty Savings and Loan Association
Little Rock, Arkansas - In Conservatorship
Termination of Directors' and Officers' Liability
Investigation

This memorandum requests your authority to terminate the Directors' and Officers' liability investigation for Madison Guaranty Savings and Loan Association ("Association") based on the following investigative findings.

The Association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the Association was a result of the administration of president and owner James B. McDougal. McDougal purchased the association February 1982. He maintained control of the association until July 1986. During the McDougal administration the association grew from \$6 million to \$123 million. The Justice Department prosecuted McDougal for bank fraud. He was acquitted in May, 1990.

The Association did not maintain directors and officers insurance. There were nine individuals who may be held culpable for the failure of the association. The Association's files contained financial statements for these individuals (see attached). The total net worth of these individuals is \$2,995,536.00 with an expected potential recovery of \$904,220.

<u>Name</u>	<u>Statement Date</u>	<u>Reported Net Worth</u>	<u>Estimated Recovery</u>
Cuffman, Stephen	8/16/88	FOIA(b)(7) - (C)	
Denton, Don	10/15/87		
Edwards, Rev. C. D.	8/15/88		
Hawkins, Sarah	8/16/88		
Latham, John	10/31/87		
McDougal, James B. & Susan H.	1/27/86		
Owen, Jack	12/10/87		
Peacock, Charles III			
	Total:		

- 1) Adjusted for homestead and personal property.
- 2) All net worth is homestead and personal property.
- 3) Adjusted value of Madison Guaranty Stock to zero.
- 4) Current net worth after all bankruptcy.

The potential recovery is insufficient to make a Directors' and Officers' liability claim economically justifiable. Based on the foregoing information a close-out of the Directors' and Officers' liability investigation is recommended.

CONCUR:

David Eisenstein
Senior Counsel

William Roelle
Director

Mr. Rosen
Mr. Thomas
Mr. Beaty

Mr. Roelle
Mr. Dudine
Mr. Eisenstein

Ms. Bartley
Ms. Keyes
Mr. Martinelli, R/D
Mr. Asbacher, SIS

TO: William Roelle
Director, Operations and Resolutions

and

David Eisenstein
Senior Attorney

FROM: April Breslaw *AB*
Senior Attorney

SUBJECT: Madison Guaranty Savings & Loan Association
Little Rock, Arkansas
In Conservatorship #8313
Bond Claim Close-Out

This memorandum requests your authority to terminate the Bond Claim investigations for Madison Guaranty Savings & Loan Association (the association) based on the following investigative findings.

The association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the association was largely the result of the influence of James B. McDougal. McDougal purchased the association and served as its president until late 1984. It is believed that he continued to affect the operations of the association through his role in its holding company after he resigned from his management positions. This period of indirect influence seems to have occurred between late 1984 and July 1986. In any event, McDougal was the subject of a criminal referral filed by the association on March 19, 1987. There is an ongoing criminal investigation into his activities.

The association's last blanket bond expired on April 30, 1987. Renewal or replacement coverage could not be secured. Insider loans and losses caused by acts of James McDougal, his wife Susan, and John Latham were excluded from coverage. No notice or claims were ever submitted to the bond carrier.

Fidelity bonds generally provide coverage for losses caused by officers or employees. If it can be shown that a director is functioning as an officer, e.g., making specific operational decisions, it is possible to obtain bond coverage for losses caused by such a director's dishonesty. In this case, McDougal left management in 1984. While the criminal referral submitted in 1987 indicates that potentially dishonest activity was discovered during the life of the bond, such activity appears to have occurred after McDougal had lost status as an officer. Coverage covered by the

bond. His role at the time dishonesty may have occurred would likely not be considered operational enough to merit coverage. The cost of pursuing such an approach with the bond carrier outweighs its benefit.

Based on the foregoing information a close-out of the Bond Claim is recommend.

Concurred:

David Eisenstein
Senior Counsel

William Roelle, Director
Operations and Resolutions

Chairman Seidman Mr. Jacobs
Mr. Rosen ~~Mr. Beatty~~
Mr. Thomas Mr. Roelle
Mr. Monahan Mr. Dudine
Mr. Braceley Mr. Martinelli, R/D

February 26, 1991

Memorandum To: Gerald Jacobs
 Special Counsel to the RTC

 and

 William Roelle
 Deputy Executive Director

From: April Breslaw *AB*
 Senior Attorney

Re: 7236 Madison Guaranty Savings and Loan
 Augusta, Ark. - In Receivership

 Request for Authorization to Accept
 Settlement Offer

RECOMMENDATION

This memorandum requests authority to settle a pending accounting malpractice case by accepting the \$1,025,000 offered by Crum and Forster ("C&F"), the carrier which provided defendant Frost and Company ("Frost") with liability coverage.

C&F has not given a specific date on which its offer expires. However, our case is scheduled for trial on March 25, 1991. If authorization to accept the carrier's offer is granted by March 11, 1991, we will save the expense of the final two weeks of trial preparation. We estimate this amount to be approximately \$50,000.

¹ Past experience indicates that C&F displays more serious interest in settlement as a trial date approaches. In this case, we do not believe that C&F is aware that there is a real chance that our trial will be rescheduled for next Fall. If C&F becomes aware of this possibility, it may rescind the offer, invest the settlement funds, and resume bargaining with us in eight to ten months. Avoiding this contingency is another reason to evaluate the outstanding offer quickly.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 2

Elements of the Claim

In order to prevail, we must prove the existence of:

- (1) an audit failure
- (2) which caused
- (3) loss.

1. Audit Failure

Frost audited the Madison Guaranty Savings and Loan ("Madison") financial statements for 1984 and 1985. In each instance, an unqualified opinion, i.e., one which concluded that the statements fairly reflected the S&L's financial condition, was issued. However, the FHLBB's 1986 examination found significant deficiencies in Madison's accounting treatment of real estate development projects, subsidiary investment, and reserve for loan losses. The adjustments imposed as a result of this examination rendered Madison insolvent.

Madison subsequently retained Peat, Marwick, Main and Company to re-audit the statements first evaluated by Frost. Peat, Marwick reached two conclusions: first, that Madison's internal controls were so poor that the S&L's financial statements were virtually incapable of audit and second, that there was serious question about Madison's ability to continue as a going concern. Because these were very different conclusions that those reached in the initial audits, Madison sued Frost for malpractice.

We inherited the case when Madison was placed in conservatorship in 1989.² Investigation by in-house CPA Lee Sorenson of NCCO supports the conclusion that audit failures occurred. Most significant, Frost did not calculate Madison's loan loss reserve by performing detailed review of specific loans. Instead, Frost simply allotted one per cent of the outstanding balance of each relevant category of loans to the reserve. Further, Frost failed to test the adequacy of any of the appraisals in Madison's files and entirely based its past-due loan testwork on information provided by Madison's management. No attempt to verify this information through appraisal or financial statement data was made.

Our independent expert has testified that Frost should have evaluated the risk of loss in Madison's portfolio by classifying loans as bank examiners do. He's further testified that Laventhol and Horwath ("L&H"), the firm with which he was a partner until its recent bankruptcy, employed this approach to

² Since "final resolution" in October of 1990, we have pursued the action on behalf of RTC Corporate.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 3

bank and S&L audits as a standard practice.

Unfortunately, our expert has only been able to produce documentation which shows that L&H routinely handled bank audits in this manner. He has not been able to document standard practice for S&L audits.³ Further, Frost's attorneys have discovered an S&L audit performed by another L&H partner at about the same time as those at stake in this case in which a different method of evaluating risk of loss was employed. If the case is tried, Frost's attorneys will certainly use these inconsistencies to attack the credibility of our expert.

It is, however, worth noting that the relevant accounting standards do not require that an auditor use any specific method of evaluating risk of loan loss. Instead, they require only that a method be used which considers the overall circumstances surrounding the tested transactions. In its re-audit of Madison, Peat Marwick used a different method than the one recommended by our expert, but reached the same conclusions. Because Frost did not employ any such method, we should be able to prove that its audits are flawed - regardless of the problems with our expert's testimony. Overall, our chance of prevailing on this element of the case is approximately 70 per cent.

2. Causation

In any accounting malpractice case, we must show that the relevant S&L relied on the flawed audits to make subsequent business decisions. Put another way, we must show that but for its reliance on flawed audits, the S&L would have stopped or slowed investment in the speculative projects which ultimately caused loss. In an Arkansas malpractice case, we must show that in comparison with other possible causes, the defendant auditor was more than 50% responsible for the loss which resulted from its flawed audits.

In this case, we will have a series of problems demonstrating that Madison relied on the audits to make decisions. First, Madison CEO John Latham plead guilty to bank fraud charges last Spring. It is highly unlikely that different audits would have influenced his decision making. Second, Madison's board of directors was passive. For the most part, it did what Latham and primary shareholder McDougal told it to do.⁴ Even today, only one

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Memorandum to Mr. Jacobs and Mr. Roelle

Page 4

director is willing to testify that he would have voted against additional risky real estate development lending if Madison's outside auditor had generated critical audits.

Much of the loss which underlies our case is attributable to abusive insider transactions. Consequently, if Frost is able to introduce evidence of the contributory negligence of the individuals who initiated and approved these transactions, i.e., the reckless insiders and passive outsiders, we probably have only a 40% chance of proving that auditors are more than half responsible for the loss which ensued.

In response to this problem, we have asked the court to issue an order which prevents the introduction of evidence at trial of the inappropriate manner in which the Madison directors and officers managed the institution. We've based our request on a line of cases which have held that the only evidence of audit client mismanagement admissible in an accountant liability suit is evidence that the audit client provided the accountant with false financial information to audit.

This is the first time that this argument has been made in Arkansas. Last year, it was rejected in Minnesota, another state within the 8th Circuit. It's been accepted in a scattered mix of jurisdictions across the country, including a recent 10th Circuit decision which interpreted the law of Oklahoma, Arkansas' neighbor. We estimate that we have a 50% chance of winning the motion which raises this issue.

If our evidentiary motion succeeds, our chance of proving that Frost is more than half responsible for the relevant loss improves. However, Frost will do everything possible to convince the jury that the loss occurred because of events outside its control. We believe that Frost will argue that the downturn in the Arkansas economy contributed to the loss. We also believe that Frost will claim that the FHLBB contributed to the loss by accepting Madison business-plans which tolerated continued real estate development lending. Finally, Frost will attack the Arkansas regulators for failing to close Madison when it became insolvent.

We have asked the court to issue an order which prevents the introduction of evidence of regulatory contributory negligence at trial. This request is based a very strong line of cases which holds that bank and thrift regulators' duty to perform responsibly runs only to the public. It does not run to the directors, officers and other professionals affiliated with a failed institution. We are almost certain to obtain the evidentiary order which we seek on this point.

However, it was the contrast between the Frost audits and the

Memorandum to Mr. Jacobs and Mr. Roelle
Page 5

results of the FHLBB 1986 examination which prompted Madison to investigate audit failure. (See above.) Consequently, Frost has subpoenaed the relevant examiner and supervisory agent. Its' attorneys will certainly try to steer these individuals' testimony away from its proper purpose - confirmation that an audit failure occurred - and toward evidence of regulatory mistake. Assuming that we obtain the order which eliminates evidence of regulatory negligence from the case, we will object to this tactic. However, the jury may find the process confusing.

(In this regard, it is worth mentioning that our case is pending in a fairly widespread federal district. As a result, our jury will be drawn from both Little Rock and outlying rural areas. Consequently, there is some risk that the jury will not have the sophistication to understand the more complicated aspects of our argument.

Mr. Roelle is from

ARKANSAS

To summarize: Assuming that we win both of our evidentiary motions, i.e., that evidence of both director/officer contributory negligence and regulatory contributory negligence is officially eliminated from the case, we have approximately a 60% chance of proving that auditors are more than half responsible for the loss which underlies this action.

3. Loss

Frost cannot be held responsible for loss incurred prior to its involvement with Madison. Further, Frost cannot be held liable for loss recklessly incurred by Madison after it was notified that the audits were flawed. Keeping these parameters in mind, we believe that our damage window runs from July 18, 1985 to July 11, 1986. The first of these dates reflects the point at which Madison's board reviewed and began to rely on the 1984 audit. The second reflects the point at which the board was notified of potential flaws in Frost's conclusions through receipt of the FHLBB 1986 examination and proposed Cease and Desist Order. During this period, principal advances were made which have generated approximately \$7,000,000 in loss.

Financial Analysis of Proposed Settlement

The \$3,000,000 policy issued by C&F is our recovery source.⁵ The following calculations translate the above discussion into numerical terms.

⁵ Frost is a small firm with almost insignificant resources. Absorbing the insurance policy's \$50,000 deductible will be its contribution to the settlement.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 6

First scenario:

.70 (chance of proving audit failure)
x.40 (chance of proving causation if evidence of
director/officer contributory negligence is admissible)
= .28

.28 x \$3,000,000 (insurance policy) = \$840,000

Second scenario:

.70 (chance of proving audit failure)
x.60 (chance of proving causation if evidence of director
& officer contributory negligence is not admissible)
= .42

.42 x \$3,000,000 (insurance policy) = \$1,260,000

The difference between calculations for the two scenarios
(\$1,260,000 - 840,000) = \$420,000.

\$420,000
x .50 (chance of excluding evidence of director/officer
contributory negligence by winning pending
motion)
= \$210,000

Improving \$840,000, our causation worst case scenario, by
\$210,000 to reflect our chance of winning the pending evidentiary
motion leaves us with a settlement figure of \$1,050,000.

However, because the judge is behind schedule, he may postpone
our trial. The trial of a case of this complexity will take
approximately a month. A month block of court time is not likely
to become available until the Fall of 1991. If time is allotted
for the trial itself, jury deliberation, post judgement motions,
and the court's final ruling, it becomes apparent that if the
trial is not held in March of 1990, we will not received the
proceeds of a judgement for six months to a year.

The present value of our \$1,050,000 settlement figure received in
six months is \$1,014,500. The present value of our \$1,050,000
settlement figure received in one year is \$981,308. The current
\$1,025,000 offer exceeds both.

To date, we have incurred approximately \$150,000 in legal fees
and \$40,000 in expert fees. Final preparation and trial of this
matter is ~~likely to cost (ADR) \$163,053; Do not 070103134 Page 23~~ and \$10,000
in expert fees to our cost. Accepting the carrier's offer would

Memorandum to Mr. Jacobs and Mr. Roelle
Page 7

therefore enable us to save \$85,000.

Conclusion

For the foregoing reasons, I recommend that we settle this matter by accepting the carrier's \$1,025,000 offer.

CONCUR:

John B. Beaty
John Beaty
Assistant General Counsel
Legal Division

Michael Martinelli
Michael Martinelli
Regional Director, RTC-Central

Gerald Jacobs by dja
Gerald Jacobs
Special Counsel to the RTC
Legal Division

William Roelle
William Roelle
Deputy Executive Director
RTC



Resolution Trust Corporation

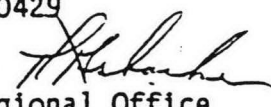
P.O. Box 1336, Burnsville, MN 55337 (612) 894-0800

Mr. Byrne
Mr. Douglas
Mr. Rosen

Ms. Bartley
Ms. Wood
Mr. Martinelli, Regional Director
Mr. Asbacher, SLS/Investigations

DATE: January 18, 1990

TO: Cecil Underwood, Assistant General Counsel
and
William Roelle, Director/Resolutions and Operations
Federal Deposit Insurance Corporation
550 - 17th Street N.W.
Washington, D.C. 20429

FROM: Robert H. Asbacher 
SLS/Kansas City Regional Office

PREPARED BY: Lee B. Sorenson
Investigator
North Central Consolidated Office

SUBJECT: Madison Guaranty Savings & Loan Association
Little Rock, Arkansas
In Conservatorship #8313
Bond Claim Close-Out

This memorandum requests your authority to terminate the Bond Claim investigations for Madison Guaranty Savings & Loan Association (the association) based on the following investigative findings.


The association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the association was a result of the administration of President and Owner James B. McDougal. McDougal purchased the association February 1982 and maintained control of the association until July 1986. During the McDougal administration the association grew from \$6 million to \$123 million. McDougal was the subject of a criminal referral filed by the association on March 19, 1987, there is an ongoing criminal investigation into his action.

The association's last blanket bond expired on April 30, 1987. It was a Financial Institution's Special Bond. Renewal or replacement coverage could not be secured. Insider loans; as well as acts of James McDougal, his wife Susan, and John Latham; were excluded from coverage. No notice or claims were ever filed on the bond.

P.O. Box 1336 • Burnsville, MN 55337 • (612) 894-0800

Mr. Byrne
Mr. Douglas
Mr. RosenMs. Bartley
Ms. Wood
Mr. Martinelli, Regional Director

DATE: October 18, 1989

TO: John Thomas, Associate General Counsel
and
William Roelle, Director/Resolutions and Operations
Federal Deposit Insurance Corporation
550 - 17th Street N.W.
Washington, D.C. 20429FROM: Robert Asbacher 
SLS/Investigations
Kansas City Regional OfficePREPARED BY: Liquidation Assistant/Investigations
Burnsville RTC Consolidated Office
Burnsville, MinnesotaSUBJECT: Madison Guaranty Savings and Loan Association
Little Rock, Arkansas
In Conservatorship 8313
Directors' and Officers' Claim Close-Out

This memorandum requests your authority to terminate the Directors' and Officers' Claim investigation for Madison Guaranty Savings and Loan Association (the association) based on the following investigative findings.

The association was placed in conservatorship by the Federal Home Loan Bank Board on March 2, 1989. The failure of the association was a result of the administration of president and owner James B. McDougal. McDougal purchased the association February 1982, he maintained control of the association until July 1986. During the McDougal administration the association grew from \$6 million to \$123 million. McDougal was the subject of a criminal referral filed by the association on March 19, 1987, there is an ongoing criminal investigation into his actions.

The association did not maintain any directors' and officers' insurance. There were nine individuals who may be held culpable for the failure of the association. The association's files contained financial statements for these individuals (see attached). The total net worth of these individuals is \$2,995,536.00 with an expected potential recovery of \$904,220.

John Thomas, Associate General Counsel
William Roelle, Director/Resolutions and Operations
Madison Guaranty S&L Association, Little Rock, AR - #8313
Directors' and Officers' Claim Close-Out

<u>Name</u>	<u>Statement Date</u>	<u>Reported Net Worth</u>	<u>Estimated Recovery</u>
Cuffman, Stephen	8/16/88	FOIA(b)(7) - (C)	
Denton, Don	10/15/87		
Edwards, Rev. C. D.	8/15/88		
Hawkins, Sarah	8/16/88		
Latham, John	10/31/87		
McDougal, James B. & Susan H.	1/27/86		
Owen, Jack	12/10/87		
Peacock, Charles III			
	TOTAL:		

- 1) Adjusted for homestead and personal property.
- 2) All net worth is homestead and personal property.
- 3) Adjusted value of Madison Guaranty stock to zero.
- 4) Currently in Chapter 11 bankruptcy.

The potential recovery is insufficient to make a Directors' and Officers' claim economically justifiable. Based on the foregoing information a close-out of the Directors' and Officers' claim is recommended.

Concurred:

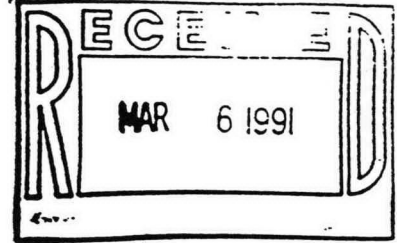
April A. Breslaw, Attorney

Approved:

John Thomas
Associate General Counsel

William Roelle, Director,
Resolutions and Operations

March 5, 1991



TO: James Thompson
Assistant Regional Director

FROM: John B. Beaty
Assistant General counsel

RE: 7236 Madison Guaranty Savings
Augusta Arkansas - In receivership

Request for Authorization to Settle

The enclosed memorandum seeks authority to settle an accounting malpractice claim against Frost and Company, the former auditors of Madison Guaranty Savings, Augusta Arkansas. It has been forwarded to you for signature because Regional Director Martinelli is out of town.

The request has been reviewed for legal merit and is being submitted to you for review as a business decision. Of particular interest may be the last pages of the memorandum which contain a financial analysis of the proposed settlement. The investigator in Eagan Minnesota and his supervisors have reviewed the accuracy of the factual underpinnings of the memorandum, and they agree that the settlement is advantageous. The Regional Counsel has been provided opportunity to review the memo for impact on other legal work in the region.

If you concur in the recommendation, please sign and return the original of the memorandum to me at 1775 K Street, NW, 6th Floor, Washington, D.C. 20006 by overnight mail. If you have questions or concerns, please feel free to contact the Kansas City PLS Counsel Julie Yanda, who is familiar with this matter.

cc: E. Glion Curtis, Regional Counsel (w/encl.)
Robert Asbacher, SIS (w/enclosure)

Memorandum to Mr. Jacobs and Mr. Roelle
Page 2

Elements of the Claim

In order to prevail, we must prove the existence of:

- (1) an audit failure
- (2) which caused
- (3) loss.

1. Audit Failure

Frost audited the Madison Guaranty Savings and Loan ("Madison") financial statements for 1984 and 1985. In each instance, an unqualified opinion, i.e., one which concluded that the statements fairly reflected the S&L's financial condition, was issued. However, the FHLBB's 1986 examination found significant deficiencies in Madison's accounting treatment of real estate development projects, subsidiary investment, and reserve for loan losses. The adjustments imposed as a result of this examination rendered Madison insolvent.

Madison subsequently retained Peat, Marwick, Main and Company to re-audit the statements first evaluated by Frost. Peat, Marwick reached two conclusions: first, that Madison's internal controls were so poor that the S&L's financial statements were virtually incapable of audit and second, that there was serious question about Madison's ability to continue as a going concern. Because these were very different conclusions that those reached in the initial audits, Madison sued Frost for malpractice.

We inherited the case when Madison was placed in conservatorship in 1989.² Investigation by in-house CPA Lee Sorenson of NCCO supports the conclusion that audit failures occurred. Most significant, Frost did not calculate Madison's loan loss reserve by performing detailed review of specific loans. Instead, Frost simply allotted one per cent of the outstanding balance of each relevant category of loans to the reserve. Further, Frost failed to test the adequacy of any of the appraisals in Madison's files and entirely based its past-due loan testwork on information provided by Madison's management. No attempt to verify this information through appraisal or financial statement data was made.

Our independent expert has testified that Frost should have evaluated the risk of loss in Madison's portfolio by classifying loans as bank examiners do. He's further testified that Laventhol and Horwath ("L&H"), the firm with which he was a partner until its recent bankruptcy, employed this approach to

² Since "final resolution" in October of 1990, we have pursued the matter on behalf of RTC Corporate.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 3

bank and S&L audits as a standard practice.

Unfortunately, our expert has only been able to produce documentation which shows that L&H routinely handled bank audits in this manner. He has not been able to document standard practice for S&L audits.³ Further, Frost's attorneys have discovered an S&L audit performed by another L&H partner at about the same time as those at stake in this case in which a different method of evaluating risk of loss was employed. If the case is tried, Frost's attorneys will certainly use these inconsistencies to attack the credibility of our expert.

It is, however, worth noting that the relevant accounting standards do not require that an auditor use any specific method of evaluating risk of loan loss. Instead, they require only that a method be used which considers the overall circumstances surrounding the tested transactions. In its re-audit of Madison, Peat Marwick used a different method than the one recommended by our expert, but reached the same conclusions. Because Frost did not employ any such method, we should be able to prove that its audits are flawed - regardless of the problems with our expert's testimony. Overall, our chance of prevailing on this element of the case is approximately 70 per cent.

2. Causation

In any accounting malpractice case, we must show that the relevant S&L relied on the flawed audits to make subsequent business decisions. Put another way, we must show that but for its reliance on flawed audits, the S&L would have stopped or slowed investment in the speculative projects which ultimately caused loss. In an Arkansas malpractice case, we must show that in comparison with other possible causes, the defendant auditor was more than 50% responsible for the loss which resulted from its flawed audits.

In this case, we will have a series of problems demonstrating that Madison relied on the audits to make decisions. First, Madison CEO John Latham plead guilty to bank fraud charges last Spring. It is highly unlikely that different audits would have influenced his decision making. Second, Madison's board of directors was passive. For the most part, it did what Latham and primary shareholder McDougal told it to do.⁴ Even today, only one

³ Contrary to our expert's initial testimony, it appears that L&H did not have a standard approach to S&L audits.

⁴ McDougal was tried for bank fraud last Spring. Mainly through prosecutorial error, he was acquitted.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 4

director is willing to testify that he would have voted against additional risky real estate development lending if Madison's outside auditor had generated critical audits.

Much of the loss which underlies our case is attributable to abusive insider transactions. Consequently, if Frost is able to introduce evidence of the contributory negligence of the individuals who initiated and approved these transactions, i.e., the reckless insiders and passive outsiders, we probably have only a 40% chance of proving that auditors are more than half responsible for the loss which ensued.

In response to this problem, we have asked the court to issue an order which prevents the introduction of evidence at trial of the inappropriate manner in which the Madison directors and officers managed the institution. We've based our request on a line of cases which have held that the only evidence of audit client mismanagement admissible in an accountant liability suit is evidence that the audit client provided the accountant with false financial information to audit.

This is the first time that this argument has been made in Arkansas. Last year, it was rejected in Minnesota, another state within the 8th Circuit. It's been accepted in a scattered mix of jurisdictions across the country, including a recent 10th Circuit decision which interpreted the law of Oklahoma, Arkansas' neighbor. We estimate that we have a 50% chance of winning the motion which raises this issue.

If our evidentiary motion succeeds, our chance of proving that Frost is more than half responsible for the relevant loss improves. However, Frost will do everything possible to convince the jury that the loss occurred because of events outside its control. We believe that Frost will argue that the downturn in the Arkansas economy contributed to the loss. We also believe that Frost will claim that the FHLBB contributed to the loss by accepting Madison business plans which tolerated continued real estate development lending. Finally, Frost will attack the Arkansas regulators for failing to close Madison when it became insolvent.

We have asked the court to issue an order which prevents the introduction of evidence of regulatory contributory negligence at trial. This request is based a very strong line of cases which holds that bank and thrift regulators' duty to perform responsibly runs only to the public. It does not run to the directors, officers and other professionals affiliated with a failed institution. We are almost certain to obtain the evidentiary order which we seek on this point.

However, it was the contrast between the Frost audits and the

Memorandum to Mr. Jacobs and Mr. Roelle
Page 5

results of the FHLBB 1986 examination which prompted Madison to investigate audit failure. (See above.) Consequently, Frost has subpoenaed the relevant examiner and supervisory agent. Its' attorneys will certainly try to steer these individuals' testimony away from its proper purpose - confirmation that an audit failure occurred - and toward evidence of regulatory mistake. Assuming that we obtain the order which eliminates evidence of regulatory negligence from the case, we will object to this tactic. However, the jury may find the process confusing.

In this regard, it is worth mentioning that our case is pending in a fairly widespread federal district. As a result, our jury will be drawn from both Little Rock and outlying rural areas. Consequently, there is some risk that the jury will not have the sophistication to understand the more complicated aspects of our argument.

To summarize: Assuming that we win both of our evidentiary motions, i.e., that evidence of both director/officer contributory negligence and regulatory contributory negligence is officially eliminated from the case, we have approximately a 60% chance of proving that auditors are more than half responsible for the loss which underlies this action.

3. Loss

Frost cannot be held responsible for loss incurred prior to its involvement with Madison. Further, Frost cannot be held liable for loss recklessly incurred by Madison after it was notified that the audits were flawed. Keeping these parameters in mind, we believe that our damage window runs from July 18, 1985 to July 11, 1986. The first of these dates reflects the point at which Madison's board reviewed and began to rely on the 1984 audit. The second reflects the point at which the board was notified of potential flaws in Frost's conclusions through receipt of the FHLBB 1986 examination and proposed Cease and Desist Order. During this period, principal advances were made which have generated approximately \$7,000,000 in loss.

Financial Analysis of Proposed Settlement

The \$3,000,000 policy issued by C&F is our recovery source.⁵ The following calculations translate the above discussion into numerical terms.

⁵ Frost is a small firm with almost insignificant resources. Absorbing the insurance policy's \$50,000 deductible will be its contribution to the settlement.

Memorandum to Mr. Jacobs and Mr. Roelle
Page 6

First scenario:

.70 (chance of proving audit failure)
x.40 (chance of proving causation if evidence of
director/officer contributory negligence is admissible)
= .28

.28 x \$3,000,000 (insurance policy) = \$840,000

Second scenario:

.70 (chance of proving audit failure)
x.60 (chance of proving causation if evidence of director
& officer contributory negligence is not admissible)
= .42

.42 x \$3,000,000 (insurance policy) = \$1,260,000

The difference between calculations for the two scenarios
(\$1,260,000 - 840,000) = \$420,000.

\$420,000
x .50 (chance of excluding evidence of director/officer
contributory negligence by winning pending
motion)
= \$210,000

Improving \$840,000, our causation worst case scenario, by
\$210,000 to reflect our chance of winning the pending evidentiary
motion leaves us with a settlement figure of \$1,050,000.

However, because the judge is behind schedule, he may postpone
our trial. The trial of a case of this complexity will take
approximately a month. A month block of court time is not likely
to become available until the Fall of 1991. If time is allotted
for the trial itself, jury deliberation, post judgement motions,
and the court's final ruling, it becomes apparent that if the
trial is not held in March of 1990, we will not receive the
proceeds of a judgement for six months to a year.

The present value of our \$1,050,000 settlement figure received in
six months is \$1,014,500. The present value of our \$1,050,000
settlement figure received in one year is \$981,308. The current
\$1,025,000 offer exceeds both.

To date, we have incurred approximately \$150,000 in legal fees
and \$40,000 in expert fees. Final preparation and trial of this
matter is likely to add about \$75,000 in legal fees and \$10,000
in expert fees to our cost. Accepting the carrier's offer would

Memorandum to Mr. Jacobs and Mr. Roelle
Page 7

therefore enable us to save \$85,000.

Conclusion

For the foregoing reasons, I recommend that we settle this matter by accepting the carrier's \$1,025,000 offer.

CONCUR:

WJE John B. Beaty
John Beaty
Assistant General Counsel
Legal Division

James H. Thompson for
Michael Martinelli
Regional Director, RTC-Central

Gerald Jacobs
Special Counsel to the RTC
Legal Division

William Roelle
Deputy Executive Director
RTC

To: L. Richard Iorio@INVEST-1@RTCKC
Cc: Lee O. Ausen@INVEST-1@RTCKC
Bcc:
From: L. Jean Lewis@INVEST-1@RTCKC
Subject: #7236 Madison Guaranty Savings
Date: Thursday, September 23, 1993 16:03:56 EDT
Attach:
Certify: N
Forwarded by: James R. Dudine@Oper-inv@RTCDC

Comments by: James R. Dudine@Oper-inv@RTCDC
Forwarded to: Carl F. Gamble@Legal-pls@RTCDC
Comments:

Carl, these referrals may have some connection to the one naming B&h as witnesses. We need to discuss this.

Comments by: L. Richard Iorio@INVEST-1@RTCKC
Forwarded to: Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXECFSC@RTCKC
James R. Dudine@Oper-inv@RTCDC
Comments:

FYI. We are still about two weeks away.

[Original Message]

I've just had a conversation with Donna Henneman, Ethics Program Manager, Executive Office for U. S. Attorneys. I called Donna to make a final determination as to whether or not she wants formal notification of the existence of the subsequent referrals being submitted to the U. S. Attorney, Eastern District of Little Rock, on Madison.

In discussing the standard RTC procedure of the submission of referrals, she has requested that she be copied on the transmittal letters that go to the U. S. Attorney and FBI. At the time she receives the copies of those letters, she will then request the referrals and exhibits from the U. S. Attorney's office for any necessary follow up. So, at her request, I'll ask Donna Minton to cc: Ms. Henneman in her official capacity. She felt that a letter requesting copies at this point was unnecessary, and if it becomes necessary, she will go through her channels at Justice to obtain the documentation from U. S. Attorney Paula Casey. Donna has also requested that I provide a brief one paragraph summary of the content of the referrals with the transmittal letters, so that she will be aware of those with "sensitivity issues." I will be glad to provide the requested summary as an addendum paragraph to the bottom of each transmittal letter.

She then asked me about the final disposition of MGS&L referral C0004. I told her that I had been advised that it was received back in the U. S. Attorney's office, but that I had received no formal notification that a case had been opened, nor a declination letter. I expressed my concerns that the same situation could befall the next referrals to be submitted, and she assured me

that she and her supervisor, Deb Westbrook, would stay closely in touch with the situation, due it's potentially political ramifications, some of which I explained for her edification.

She asked me to stay in touch as to the responses that I get from the U.S. Attorney's office, and assured me that, if necessary, the "higher-ups" at Justice would make sure something got done with these referrals, including the first one, which in her words "should have been handled by now, one way or the other."

I'll keep you posted.

To: Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXEFCSC@RTCKC
James R. Dudine@Oper-inv@RTCDC

Cc:
Bcc: Lee O. Ausen@INVEST-1@RTCKC
From: L. Richard Iorio@INVEST-1@RTCKC
Subject: Madison Guaranty #7236, Little Rock, Arkansas
Date: Friday, September 24, 1993 12:12:21 CDT
Attach:
Certify: N
Forwarded by:

Privileged and Confidential

Documents concerning captioned matter will be hand delivered to Messers Cavinaw and Thompson this date. Documents for Dudine will be overnighted today with a separate copy being sent by US Mail, registered, return receipt requested. The second copy to Dudine is being sent to comply with transmittal procedures.

Early next week, review sessions will be held with Phil Adams, PLS Attorney and Jane Jankowski, Public Affairs. They will be provided copies of the documents.

Actual transmission of the documents to Little Rock, Arkansas, will not occur until Friday, 10/1/93. Transmission is being delayed one week to provide for review and appropriate notification.

Separate civil review concerning the institution in question is still in progress. Delay has occurred because of the unavailability of certain review documents. Efforts are still underway to secure and review these documents. It is anticipated that civil review and report will be available within the next 30-45 days. Following preparation and review of the report, it will be forwarded to Julie Yanda for appropriate action.

If questions, please contact me.

To: Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXEFCFSC@RTCKC
James R. Dudine@Oper-inv@RTCDC

Privileged and Confidential

Cc:
Bcc: Lee O. Ausen@INVEST-1@RTCKC
From: L. Richard Iorio@INVEST-1@RTCKC
Subject: Madison Guaranty #7236, Little Rock, Arkansas
Date: Friday, September 24, 1993 12:12:21 CDT
Attach:
Certify: N
Forwarded by:

Documents concerning captioned matter will be hand delivered to Messers Cavinaw and Thompson this date. Documents for Dudine will be overnighted today with a separate copy being sent by US Mail, registered, return receipt requested. The second copy to Dudine is being sent to comply with transmittal procedures.

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If questions, please contact me.

To: L. Richard Iorio@INVEST-1@RTCKC
Cc: Lee O. Ausen@INVEST-1@RTCKC
Bcc:
From: L. Jean Lewis@INVEST-1@RTCKC
Subject: #7236 Madison Guaranty Savings
Date: Wednesday, September 29, 1993 12:16:43 EDT
Attach:
Certify: N
Forwarded by: James R. Dudine@Oper-inv@RTCDC

Comments by: James R. Dudine@Oper-inv@RTCDC
Forwarded to: Carl F. Gamble@Legal-pls@RTCDC
Comments:

FYI

=====
Comments by: L. Richard Iorio@INVEST-1@RTCKC
Forwarded to: Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXECFSC@RTCKC
James R. Dudine@Oper-inv@RTCDC
Comments:

FYI.

----- [Original Message] -----

I've just received a call from Donna Henneman, Ethics Program Manager, Executive Office for U. S. Attorney's, Washington, D. C. She advised that she had spoken to her supervisor, Deb Westbrook, and Ms. Westbrook's supervisor, Doug Frazier, regarding whether or not the Executive Office wanted copies of the madison referrals slated for submission this week. Ms. Westbrook and Mr. Frazier have determined that the Executive office should receive copies of the referrals and exhibits. Upon receipt, they will review them and determine whether to instruct the U.S. Attorney's office to act on them accordingly, or if they should be forwarded to the Public Integrity Section of DOJ for further review. I inquired as to the nature of the Public Integrity Section and was advised that it is the section of DOJ responsible for the prosecution of public officials. Ms. Henneman also advised that they have made the decision to get the Deputy Attorney General's office involved in this situation, and bring them up to speed.

I asked her to submit this request in writing, in order to document the Investigations file and she responded that she would do so, faxing me a letter this afternoon. I've provided her with the fax number and will copy you upon receipt of her letter.

To briefly summarize the situation to date, I contacted the Executive Office for U. S. Attorney's on May 13, 1993, at the written suggestion of U.S. Attorney Richard Pence, pursuant to his letter of May 10, 1993 regarding my written inquiry as to the final disposition of Madison referral #C0004, submitted on 9/1/92. Mr. Pence advised that the referral had been forwarded to the Executive Office of the U.S. Attorney (URTS 16305) DocId:70105434 Page 255 due to what he deemed was a "conflict of interest". This information was relayed to Ms.

003274

Henneman during my first conversation with her. During subsequent calls I received from Ms. Henneman, she advised me as to her progress in tracking the whereabouts of referral #C0004, which she finally located and had forwarded back to her office on June 8, 1993. At that time, Ms. Henneman advised me that the decision had been made by personnel in the Criminal Division of DOJ that there was "no identifiable basis for recusal of the U.S. Attorney in the Eastern District of Arkansas", and that the referral would be forwarded back to the U. S. Attorney's office in Little Rock. Since that time, Ms. Henneman has contacted me to follow up on the final disposition of the referral. I have advised her that this office has not yet received notification of an opened case, or a letter declining prosecution. During these aforementioned conversations, the issue was raised as to further referrals, and whether the Executive Office should be copied on any further referrals to avoid a recurrence of circumstances. I received notification of that decision today when Ms. Henneman contacted me, as previously outlined.

Please let me know if you have any questions.

To: L. Richard Iorio@INVEST-1@RTCKC
Cc: Lee O. Ausen@INVEST-1@RTCKC
Bcc:
From: L. Jean Lewis@INVEST-1@RTCKC
Subject: #7236 Madison Guaranty Savings
Date: Thursday, September 30, 1993 13:58:47 CDT
Attach:
Certify: Y
Forwarded by:

Just to let you know; I've received a call from Sue Schmidt with the Washington Post. She stated that there were certain people within the legal and investigative community of RTC that were afraid certain stories were being deep-sixed that needed to be broken, and she had been given my name as someone to whom she needed to speak about such potential stories. She further stated that she had tried to contact me at home, but had not been able to reach me as my number is unlisted. She then asked me if I was the Laura Jean Lewis in Shawnee Mission, Kansas, whose number was unlisted.

I advised Ms. Schmidt that regardless of whatever story she was looking for, I had no comment, advised her to contact Jane Jankowski, gave her the number, thanked her for understanding and appreciating my position, and discontinued the call.

To: L. Richard Iorio@INVEST-1@RTCKC
Cc: Lee O. Ausen@INVEST-1@RTCKC
Bcc:
From: L. Jean Lewis@INVEST-1@RTCKC
Subject: #7236 Madison Guaranty Savings
Date: Thursday, September 30, 1993 13:58:47 CDT
Attach:
Certify: N
Forwarded by: Dennis M. Cavinaw@EXEC@RTCKC

Comments by: Dennis M. Cavinaw@EXEC@RTCKC
Forwarded to: E. Glion Curtis@Legal-Exec@RTCKC
Comments:

FYI-please call after reading

=====
Comments by: L. Richard Iorio@INVEST-1@RTCKC
Forwarded to: Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXECFSC@RTCKC
James R. Dudine@Oper-inv@RTCKC
Comments:

FYI. Public affairs Kansas City has been advised.

----- [Original Message] -----

Just to let you know; I've received a call from Sue Schmidt with the Washington Post. She stated that there were certain people within the legal and investigative community of RTC that were afraid certain stories were being deep-sixed that needed to be broken, and she had been given my name as someone to whom she needed to speak about such potential stories. She further stated that she had tried to contact me at home, but had not been able to reach me as my number is unlisted. She then asked me if I was the Laura Jean Lewis in Shawnee Mission, Kansas, whose number was unlisted.

I advised Ms. Schmidt that regardless of whatever story she was looking for, I had no comment, advised her to contact Jane Jankowski, gave her the number, thanked her for understanding and appreciating my position, and discontinued the call.

8-9 referrals ready to go
Madison Guaranty Savgs

Roele

Clinton witnesses

Fun guy

Schmidt doing story Rose Law firm

FOIA # none (URTS 16305) DocId: 70105134 Page 258

000061

To: L. Richard Iorio@INVEST-1@RTCKC
Cc: Lee O. Ausen@INVEST-1@RTCKC
Jane M. Jankowski@OLA@RTCKC
Bcc:
From: L. Jean Lewis@INVEST-1@RTCKC
Subject: #7236 Madison Guaranty Savings
Date: Wednesday, October 6, 1993 10:01:54 CDT
Attach:
Certify: N
Forwarded by: Julie F. Yanda@LEGAL-PLS@RTCKC

Comments by: L. Richard Iorio@INVEST-1@RTCKC
Forwarded to: Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXECFSC@RTCKC
James R. Dudine@Oper-inv@RTCKC
Julie F. Yanda@LEGAL-PLS@RTCKC
Comments:

FYI. We are planning to mail the criminal referrals on Friday
10-8-93. PLS review is proceeding on schedule. Thanks

----- [Original Message] -----

Based on our conversation of yesterday evening, the following is a recap of
what transpired when Washington Post report Sue Schmidt showed up at my front
door.

She arrived around 7:15, I allowed her to step inside my door, I listened to
what she had to say, and then escorted her out the door at approximately 7:30.
When I showed her out the door, my parting comment was "when you
contacted me last Thursday, I told you that I had no comment, and made every
effort to be polite in doing so. What you have done this evening is the most
unprecedented breach of professional courtesy that I've ever witnessed, so I
will say this one more time, and one more time only. Do not contact me again
at my office, or at my home. I have no comment on your investigation and will
not answer any of your questions. Do not waste anymore of my time or yours."

She asked a number of questions, and made a number of comments, to all of
which I responded with "no comment" or said nothing. I did, however, listen
to what she had to say, and it was significant. I believe that she has the
crux of the referral sent last year, and that she intends to pursue the story.

She wanted to know:

- 1) if I was aware of the transaction between Whitewater Development and
International Paper Realty (this is not the topic of one of the referrals,
but is something that I looked at writing a referral on...she had
significantly more information than I did, which I believe was provided by Jim
McDougal, whom she said she interviewed yesterday)
- 2) if she should continue looking at all of McDougal's other companies,
specifically naming Madison Marketing, Great Southern Land Company, and a
number of other companies identified in referral C0004.
- 3) if I was aware that Seth Ward was Webb Hubbel's father in law
- 4) if I was aware that three senior partners at the Rose firm (that I would
prefer not to identify thru e-mail but will provide verbally if asked) "ran

off" senior partner Joe Giroir due to the fact that he was grossing more firm profits than they were (she cited a bonus amount of \$500,000)

5) if I was frustrated that my "work product was stymied and road blocked at certain federal levels", which seems to indicate that she knows that referral C0004 was held up in Washington for 9 months before it went sent back to Little Rock.

6) if the late "Vince Foster was tied to any of this".

7) if I was aware that Jeff Gerth of the New York Times was reopening his investigation of the Whitewater story he wrote last year. She then added that he would probably be the next reporter to appear on my doorstep. I thanked her for the heads up.

8) she requested my unlisted home phone, and I declined.

All of this is just an encapsulated version of her comments, which were more informative than what I've outlined here. I'll be glad to discuss this further at your request. Please let me know if you have any questions.

o: L. Richard Iorio@INVEST-1@RTCKC
c: Lee O. Ausen@INVEST-1@RTCKC
Jane M. Jankowski@OLA@RTCKC
cc:
rom: L. Jean Lewis@INVEST-1@RTCKC
subject: #7236 Madison Guaranty Savings
ate: Wednesday, October 6, 1993 10:11:54 CDT
ttach:
ertify: Y
orwarded by:

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To: L. Richard Iorio@INVEST-1@RTCKC
Cc: Lee O. Ausen@INVEST-1@RTCKC
Kenneth W. Foust@INVEST-1@RTCKC
Bcc:
From: L. Jean Lewis@INVEST-1@RTCKC
Subject: #7236 Madison Guaranty
Date: Thursday, October 7, 1993 10:35:27 CDT
Attach:
Certify: Y
Forwarded by:

Pursuant to your request during our meeting yesterday, I contacted Jeff Gerrish of the Memphis firm Gerrish & McCreary, to ascertain whether his firm represented Madison as defense counsel in the lawsuit filed by Seth Ward.

Mr. Gerrish called me this morning, and advised that his firm had not served as counsel on that litigation, but that it had been handled by two female attorneys with the Mitchell firm of Little Rock. He also recalled that Mr. Ward won the lawsuit. Mr. Gerrish suggested that I contact former Madison employee Sue Strayhorn, as she would be knowledgeable about that lawsuit, and probably remember the names of the attorneys involved. I've spoken to Sue Strayhorn on previous occasions, and have her permission to contact her again with any additional questions that may arise. I placed a call to Sue about 30 minutes ago, and left a message for her to return my call, as she was not in.

During my conversation with Mr. Gerrish, he brought up the fact that he had been contacted by a reporter with the Washington Post, Sue Schmidt, but that he had not returned her calls. He indicated that his partner, Frank McCreary, had spoken with Ms. Schmidt, and was under the impression that she was questioning why the Gerrish & McCreary firm turned the Madison lawsuit against Frost & Company over to the Rose Law Firm. He said he "found it interesting" and just thought we "ought to know."

I'll let you and Ken know what I am able to find out from Sue Strayhorn when she calls back.

To: James R. Dudine@Oper-inv@RTCDC
Thomas L. Hindes@Legal-pls@RTCDC
E. Glion Curtis@Legal-sc@RTCDC
Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXECS@RTCKC
L. Richard Iorio@INVEST-1@RTCKC
David M. Swiss@Legal-Exec@RTCKC
Russell F. Kaufman@Legal-Exec@RTCKC
Lee O. Ausen@INVEST-1@RTCKC
L. Jean Lewis@INVEST-1@RTCKC
Carl F. Gamble@Legal-pls@RTCDC
Cc: Karen L. Carmichael@LEGAL-PLS@RTCKC
Philip J. Adams@LEGAL-PLS@RTCKC
Bcc:
From: Julie F. Yanda@LEGAL-PLS@RTCKC
Subject: Madison Criminal Referrals
Date: Friday, October 8, 1993 12:56:51 CDT
Attach: MADISON
Certify: N
Forwarded by:

Pursuant to RTC internal policy memorandum dated June 17, 1993 from James Dudine, Thomas Hindes, et. al, attached please find a report that outlines the results of our review of the nine (9) pending criminal referrals out of Madison Guaranty Savings and Loan. Please contact me if you have any questions.



RESOLUTION TRUST CORPORATION

**Resolving The Crisis
Restoring The Confidence**

Karen L. Carmichael
Senior Attorney
Legal Division - PLS
7400 W. 110th., Suite 400
Overland Park, Kansas 66210
(913) 344-8100
Fax No.: (913) 344-8185
Direct Line: (913) 344-8438

INTEROFFICE MEMORANDUM

DATE: October 7, 1993

TO: Julie Fry Yanda, Counsel
Section Chief, PLS
Kansas City Office

FROM: Karen L. Carmichael, Senior Attorney, PLS
Legal Criminal Coordinator
Kansas City Office

Philip J. Adams, Senior Attorney, PLS
Kansas City Office

RE: Legal Review of KCO Investigation's Criminal Referrals: CR0190,
CR0192, CR0195, CR0196, CR0198, CR0199, CR0203, CR0210,
CR0211.

I. PURPOSE:

Pursuant to Resolution Trust Corporation ("RTC") internal policy as stated in Memoranda dated June 17, 1993 from James Dudine, Thomas Hindes, James Barker, and Jerry Patchan to All RTC Investigations Department Heads, Staff, Assistant General Counsel, Litigation Section Chiefs and Attorneys referencing Criminal Referrals, we have prepared the following review of the above criminal referrals prior to RTC forwarding same to the Department of Justice.

II. SCOPE:

In preparing this report, we have reviewed each criminal referral along with its respective accompanying exhibits as originally prepared by the KCO Investigations Department. Additionally, we have reviewed all documents within the professional liability files as well as Madison Guaranty Savings & Loan Association's Special Counsel Investigative Report prepared March 3, 1987 by the law firm of Borod & Huggins, Memphis, Tennessee. We base our conclusions solely on our review of these documents.

III. SPECIFIC REVIEW:

A. Analysis of Individual Referrals

1) CR0190:

Estimated Loss: \$135,000

Date of Violation: 10/25/85

Individuals Suspected
of violation: James McDougal
Jim Guy Tucker
John Latham
Don Denton

Corporations/Partnerships
(unnamed as violators but
cited as relevant to the
crime): Madison Financial Corporation ("MFC")
Mid-South Title
Quapaw Title

Our concerns stem from the following issues:

1. Does this referral violate any plea bargain or immunity relating to Latham's guilty plea?
2. Why isn't George Betts named as a suspect if the appraisal is alleged to be fraudulently made?
3. Why isn't Quapaw Title or Andrew Clark named in the referral if the multiple October 29, 1985 title commitments are allegedly fraudulent?
4. Where are the loan documents for subject LN#7001347; LN 3004-70?
5. Is "LN7001347" as stated in memo (Exh.E-1) the same as "LN3004-70" stated on the remitter line of \$125,000 cashier's check #LN3211? Which is the correct loan Jim Guy Tucker agreed to repay?
6. What was(were) the stated purpose(s) for which Jim Guy Tucker officially agreed to use the \$260,000 proceeds?
7. Was the loan ever in default?

8. Is Jim Guy Tucker a silent partner on MFC's Castle Grande transaction? Was MFC Tucker's nominee?
9. Who actually received the \$93,620 "profit from sale"? MFC, McDougal or Tucker?
10. Did Jim Guy Tucker and Betty Tucker list the \$93,620 "profit from sale" on their 1985 income tax return?
11. Did MFC/MGS&L consider the \$125,000/\$93,620 transaction a capital contribution?
12. Why are the alleged #3004 loan proceeds (\$260,000) divided into 2 cashier's checks (#LN3211 and #LN4731) that were disbursed on two separate days, four days apart?
13. Who is Irene Garner? Was the ARM Saver's loan adjustment on 10/1/85 significant or a motivating factor for the above (Q;#12) discrepancy?

2) CR0192:

Estimated Loss: \$50,000

Date of Violation: April/May 1985

Individuals suspected
of violation: James McDougal
J.W. Fulbright

Corporations/Partnerships
(unnamed as violators but
cited as relevant to the
crime): White Water Development, Inc. ("WWD")
Madison Financial Corporation ("MFC")
Earth Mover's Inc.
Rigg's National Bank

Our concerns stem from the following questions:

1. What do the White Water Development partnership documents provide regarding loans to the partnership by a partner?

2. Was McDougal entitled to the pre-paid "bonus" he received and which he then directly paid into the White Water Development account?
3. Did McDougal report this bonus on his 1985 tax return?
4. Did the bank suffer any loss as a result of the \$20,000 payment made to Fulbright from McDougal?
5. Into whose account at Rigg's National Bank was the Fulbright cashier's check #Q2704 deposited? Whose name? Ownership?
6. Regarding MGS&L cashier's check #LN2644:
 - a) Who was the signatory?
 - b) Who was the payee?
 - c) Who was the remitter?
 - d) Who asked the cashier check Teller for the Check?
 - e) On whose authority did the Teller cut the cashier's check?
 - f) From what proceeds did the check originate?

In addition, we would recommend that this referral include a copy of White Water Development partnership documents.

3) CR0195:

Estimated Loss: \$8,932,900

Date of Violation: 1/20/84 and 3/4/86

Individuals suspected
of violation: James McDougal
Susan McDougal
John Latham
Greg Young
Bill Henley

Corporations/Partnerships
(unnamed as violators but
cited as relevant to the
crime):

Madison Financial Corporation ("MFC")
Campobello
Maple Creek
Whitener/Whitener Construction/Whitener & Assoc.
Madison Marketing
Madison Real Estate
Designer's Construction

Our concerns stem from the following questions:

1. Has the Statute of Limitations expired?

Absent any evidence of an ongoing conspiracy, whose object had not been accomplished until the final date of suspected activity, this referral is void due to the statute of limitations' expiration. In order for the statute of limitations to be valid under 18 U.S.C. § 3293, pursuant to FIRREA, the suspected activity could not have occurred prior August 9, 1984.

2. Does potential double-jeopardy exist regarding John Latham, James McDougal?

If the same funds or property involved in Latham's plea agreement and McDougal's acquittal are involved, potential double-jeopardy exists.

This referral's primary exhibit (Exhibit A-1-7) appears to have created the exhibit from various bank statements of MFC's checking account. This exhibit, however, does not appear to include all debits and credits of the entire account. Additionally, the re-created bank statement Exhibit A-1-7 is, itself, is missing a significant number of pages. Exhibit A-1-7 only reflects pages 7, 15, 22, 36, 47, and 95. The underlying documents upon which the created exhibit is based.

4. When was the alleged \$8,932,900 "investment" made in MFC?

The referral references the "3/4/86 violation of 7.7%". Presumably, the \$8,932,900 figure represents this 7.7% investment.

Federal banking regulations allow the parent institution (MGS&L) to invest 6% in its subsidiary (MFC) without being in violation of the regulation.

According to this referral, MGS&L's 7.7% investment in to MFC is \$8,932,900. If we reduce this 7.7% figure to 1.7% (6% is allowable by federal regulation), the remaining 1.7% investment figure is \$1,972,198.50. As a result, only \$1,972,198.50 can be at issue and the subject of possible criminal violation.

The referral states on page 9 "... there is no evidence that the 7/11/86 overdraft ever occurred." This alleged "overdraft" may, in fact, represent MGS&L's 1.7% investment overage, not an overdraft.

5. Was the alleged deficiency actually charged off by either the institution or the FDIC/RTC?
6. Is the \$1.9 million overdraft/investment-overage the subject matter of the civil settlement with Frost & Co.?

7. What does the phrase "causing the institution to be AT RISK for \$8,932,900" mean with regard to criminal conduct? Is this an attempt to bring criminal charges against Frost & Co. for civil settlement as set forth in the FDIC v. Frost & Co. accountant liability civil case; as well as Bill Henley with regard to his civil settlement?

It is important to note that all the issues in this referral are identical to the fact allegations within Madison's accountant's liability civil suit that the RTC settled in April, 1993. The central issue in the RTC's suit against former Madison accountants, Frost & Company was what the RTC claimed was audit failure in connection with Frost's audit of MFC, a Madison subsidiary. Frost's audit indicates a profit of \$830,000, calculated as follows:

12/85 MGS&L investment in MFC	\$5,031,000
Shareholder Equity	\$ <u>975,000</u>
Profit	\$ 830,000

When Peat Marwick was retained to review Frost's audit workpapers, Peat determined that, contrary to Frost's audit report, the institution had actually sustained a multi million dollar loss on this transaction, calculated as follows:

12/85 MGS&L investment in MFC	\$2,621,000
Shareholder Equity	<\$5,635,000>
Loss	<\$5,789,000>

8. If so, does this referral subject Frost & Co, and Bill Henley to any Halpier considerations?
9. What releases did Frost & Co. and Bill Henley obtain from the institution and/or its successors (RTC) as set forth in the respective Settlement Agreements?

4) CR0196:

Estimated Loss: \$50,000

Date of Violation: 4/4/85

Individuals suspected of violation:

James McDougal
Charles Peacock, III
Bill Clinton Political Committee Fund

Corporations/Partnerships
(unnamed as violators but
cited as relevant to the
crime):

Madison Financial Corporation ("MFC")
Dixie Continental Leasing
Flowerwood Farms, Inc.
Bank of Cherry Valley
White Water Development Corporation
Quapaw Title

Our concerns stem from the following questions:

1. Is this transaction related to CR0211?
2. Does this referral involve funds for the same transaction on which McDougal was indicted/acquitted (ie, 145th Street Property / Castle Grande?)
3. Where is the proof of ownership of White Water Development Corporation? Have we examined the partnership documents or bank signature cards?
4. What facts do we possess that indicate the Political Campaign Fund knowingly received "misappropriated" bank funds as alleged in the referral?
5. How did Peacock divert cashier's check #Q2497 and #Q2598 on April 4, 1985 when the loan proceeds (#LN2354) of which they allegedly were a part were not disbursed until April 5, 1985?
6. Could the four \$3,000 checks be relevant to a fund raiser event for couples (ie, banquet, gala, etc.) for which the tickets cost \$1,500 a person (in 1985, the legal limit was not \$1,000 but was \$1,500)?

All the checks in question are for the amount \$3,000.

Check no.:	#Q2497 (cashier's ck)	(remitter) Ken Peacock
	#Q2498	Dean Lundrum
	#Q2496	J.W. Fulbright
	#688 (personal ck)*	Susan McDougal
	[*joint account for either Susan or James McDougal]	

All the checks in question were drafted on April 4, 1985.

7. Is the name of the spouse/escort also required by law to appear on the face of the campaign contribution (check) before the Campaign Fund may deposit the check if obtained in the course of a fund raiser event?
8. Has the statute of limitations expired on the Arkansas state campaign contribution statute? (Arkansas campaign contribution statute is a misdemeanor.)
9. What is the purpose of the reference to the Bassett memorandum?

References to the Bassett memo appear to be inconsistent with the information contained in criminal referral data (CR0199). This is particularly true in light of the fact that the HUD laws were complied with, resulting in no violations of that statute.

12. Why does the referral reference Hillary Rodham Clinton and the Arkansas Security Department. There is no explanation of their alleged involvement in the actions that are the basis for this referral.

5) CR0198:

Estimated Loss: \$116,200

Date of Violation: 2/29/84 through 1/15/86

Individuals suspected of violations: James McDougal
Jim Guy Tucker
Bill Henley
Lisa Auspaugh

Our concerns stem from the following:

1. Does potential double-jeopardy exist regarding James McDougal?
2. Has the Statute of Limitations expired?

Absent any evidence of an ongoing conspiracy, whose object had not been accomplished until the final date of suspected activity, this referral is void due to the statute of limitations' expiration. In order for the statute of limitations to be valid under 18 U.S.C. § 3293, pursuant to FIRREA, the suspected activity could not have occurred prior August 9, 1984.

3. Why isn't Chris Wade named in the referral as a suspect?
4. Why is Tucker a suspect? Where is Tucker's liability? How did Tucker benefit? There's no indication he received any benefit, nor is there any indication Madison was harmed. Madison was paid back the entire \$45,000 plus principal, interest and late penalties.
5. Was Tucker Chris Wade's nominee pursuant to the original purchase contract?
6. Why is James McDougal named in the referral?
7. Where is the evidence that Design Construction made a kickback of funds to Wade or Tucker?
8. Is this an attempt to bring criminal charges against Bill Henley for the same transaction as Madison earlier civilly settled with Henley?
9. What was the actual value of the property when Archie Hearn purchased it? Did he pay any cash on top of the \$73,800?
10. What was the appraised value of the property when Tucker became owner?

6) CR0199:

Estimated Loss: \$390,000

Date of Violation: 1984 through 1985

Individuals suspected
of violation: James McDougal
Chris Wade
Sheffield Nelson
Jerry Jones
Larry C. Wallace
John J. Flake

Corporations/Partnerships Ozark Realty
Ozark Air Service, Inc.
Head Harbor Holding, Co.
Campobello Properties Venture

Our concerns stem from the following questions:

1. Has the Statute of Limitations expired?

Absent any evidence of an ongoing conspiracy, whose object had not been accomplished until the final date of suspected activity, this referral is void due to the statute of limitations' expiration. In order for the statute of limitations to be valid under 18 U.S.C. § 3293, pursuant to FIRREA, the suspected activity could not have occurred prior August 9, 1984.

2. The exhibits tell a different story than the referral: in particular a) chronological order of events; b) ownership; c) partnership interests; and d) exchange of funds.
3. To what account was the \$373,250 deposited?
4. What is illegal about Union National Bank issuing a line a credit of which was drawn down over an 8 month period?
5. How was Jerry Jones benefitted? Larry Wallace? John Flake?

Based on referral exhibits, Jones, Wallace and Flake have a basis for a civil claim because they were injured.

6. Why does the referral claim the Interstate Land Sales Act was violated?

Exhibits and deposition testimony indicate the sales were withheld over a year so that no violation actually occurred.

7) CR0293:

Estimated Loss: \$313,000
Date of Violation: 1/1/84 through 6/18/89
Individuals suspected
of violation: E. Patrick Harris
James McDougal

Our concerns stem from the following questions:

1. Has the Statute of Limitations expired?

Absent any evidence of an ongoing conspiracy, whose object had not been accomplished until the final date of suspected activity, this referral is void due to the statute of limitations' expiration. In order for the statute of limitations to be valid under 18 U.S.C. § 3293, pursuant to FIRREA, the suspected activity could not have occurred prior August 9, 1984.

2. What is the appraised value of property on 1/1/84?
3. Why not a referral on George Betts if subsequent appraisal is suspicious?
4. Why not a referral on Abernathy Development?
5. Where is the extra \$174,000? Are we not interested in where it went?
6. Why does the referral say "Harris netted more than \$50,000" from this transaction? Pursuant to Exhibit E-4 Harris did not net \$50,000.
7. Did Bill Henley purchase this building with Harris (as Harris stated)?
8. If Henley did purchase the building with Harris, did Henley take this transaction as a tax deduction for 1983, 1984 or 1985? He stated this was his purpose for the transaction in the Borod & Huggins interview.

8) CR0210:

Estimated Loss:	\$50,000
Date of Violation:	1/10/85 and 2/22/85
Individuals suspected of violation:	James McDougal Lorene McDougal Andrew Clark

Questions:

1. Are Mr. and Mrs. Hall fictitious?
2. Is Mrs. Lorene McDougal alive?
3. Where are the loan records for #2187?

4. Where are the bank statements for Lorene McDougal's personal account? (in order to verify what funds went in and out of her account).
5. How do we know the two transactions are related? What proof do we have to verify the relationship?
6. Did Mrs. McDougal have knowledge the transaction went on in her name?
7. Is the signature on the back of Quapaw check #461 Mrs. McDougal's?

9) CR0211:

Estimated Loss: \$950,000

Date of Violation: 4/4/85 through 10/4/86

Individuals suspected
of violation:

James McDougal
Susan McDougal
Charles Peacock, III

Our concerns stem from the following questions:

1. Is there any significance that the beginning date of this referral is the same as CR0196?
2. Why isn't Latham named in the referral? Is it because this transaction was part of the original plea agreement regarding his prior indictment?
3. Why isn't Andrew Clark named in the referral?
4. Which county is the property located? Saline or Pulaski? Are we discussing the same piece of real estate?
5. How do we know both Dixie Leasing and K&D Construction are owned by Peacock? Who else has ownership interest in the corporations?
6. Does this referral have anything to do with RTC CR0001?
7. The referral says "...the sale proceeds were used to make down payment of the 145th Street track." Is this the same property

/ funds that were the subject of the criminal indictment of McDougal? If so, potential double jeopardy exists with regard to James McDougal.

8. Is the \$434,000 RTC charge off actually the balance of the \$513,273.77 figure paid to K&D by MFC? Or is the \$434,000 an additional amount to the funds paid by MFC?
9. How did we arrive at this \$950,000 loss figure?
10. Why is the "Chart of Nepotism" attached when most of the names are not part of the referral?
11. How do we know, and what evidence supports, the \$513,000 payments went into this project?
12. Were these MFC payments for work K&D performed on this property (Castle Grande) or some other property?

To: James R. Dudine@Oper-inv@RTCDC
Thomas L. Hindes@Legal-pls@RTCDC
E. Glion Curtis@Legal-sc@RTCDC
Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXEFCSC@RTCKC
L. Richard Iorio@INVEST-1@RTCKC
David M. Swiss@Legal-Exec@RTCKC
Russell F. Kaufman@Legal-Exec@RTCKC
Lee O. Ausen@INVEST-1@RTCKC
L. Jean Lewis@INVEST-1@RTCKC
Carl F. Gamble@Legal-pls@RTCDC
Cc: Karen L. Carmichael@LEGAL-PLS@RTCKC
Philip J. Adams@LEGAL-PLS@RTCKC
Bcc:
From: Julie F. Yanda@LEGAL-PLS@RTCKC
Subject: Madison Criminal Referrals
Date: Friday, October 8, 1993 12:56:51 CDT
Attach: MADISON
Certify: N
Forwarded by:

Pursuant to RTC internal policy memorandum dated June 17, 1993 from James Dudine, Thomas Hindes, et. al, attached please find a report that outlines the results of our review of the nine (9) pending criminal referrals out of Madison Guaranty Savings and Loan. Please contact me if you have any questions.

o: James R. Dudine@Oper-inv@RTCDC
Thomas L. Hindes@Legal-pls@RTCDC
E. Glion Curtis@Legal-sc@RTCDC
Dennis M. Cavinaw@EXEC@RTCKC
James G. Thompson@EXECS@RTCKC
L. Richard Iorio@INVEST-1@RTCKC
David M. Swiss@Legal-Exec@RTCKC
Russell F. Kaufman@Legal-Exec@RTCKC
Lee O. Ausen@INVEST-1@RTCKC
L. Jean Lewis@INVEST-1@RTCKC
Carl F. Gamble@Legal-pls@RTCDC
c: Karen L. Carmichael@LEGAL-PLS@RTCKC
Philip J. Adams@LEGAL-PLS@RTCKC
cc:
rom: Julie F. Yanda@LEGAL-PLS@RTCKC
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12/21/93
Privileged and Confidential
Attorney Work Product

MADISON GUARANTY
Chronology

September 27, 1993	Call from B. Roelle to J. Hanson
September 29, 1993	Meeting with B. Nussbaum, J. Hanson and Cliff Sloan in B. Nussbaum's office following Waco pre-brief
October 6, 1993	J. Hanson discussion with B. Roelle regarding S. Schmidt Kansas City attempted interviews
October 14, 1993	Meeting in B. Nussbaum's office with Cliff Sloan, {Mack} Gearan, Bruce Lindsey, Jack DeVon, Josh Steiner and Jean Hanson
December 9, 1993	Letter from Congressman Jim Leach to Roger Altman requesting information on Madison Guaranty.



GENERAL COUNSEL

DEPARTMENT OF THE TREASURY
WASHINGTON


HANSON
TREASURY

411

1/3/94
LWS
JDA

September 30, 1993

MEMORANDUM FOR ROGER C. ALTMAN
DEPUTY SECRETARY

FROM: JEAN E. HANSON 

SUBJECT: The Rose Law Firm

Steve Katsanos has talked with Sue Schmidt (See attached RTC Early Bird).

I have spoken with the Secretary and also with Bernie Nussbaum and Cliff Sloan.

I have asked Bill Roelle to keep me informed. Is there anything else you think we should be doing?

Attachment

149

10/10/93

10/10/93

- 1. Celeste Moy 703-761-8492-
- 2. Lillian Martino
- 3. Charles Bennett 662-7150
- 4. Monique Leaman
- 5. Ken Schmalzbach
- George Munoz memo re early outs
- Peter Rilling Steve
- 6. Tom McHivern 22317
- 7. Doris Washington 416-6911 ~~RC~~
- meeting this afternoon
- 8. Ben Rye 22735
- 9. Chuck Kizer
- 10. Bill Koelle 416-7579
- 11. Peter Cobb 225-3780
- 12. Stanley Tate 786-9662
- 13. Chuck Kizer 857-1516
- 14. Jack DeBore 22920

in memo 15. Glenn → fell Steve Katsanos re policy

- 16. Jan Rogue Kuder
- 17. John Bowman
- Sheila Cahill - Bear Stearns
- Pat Noble - IG report completed
- Joseph Langstaff 514-1418
- head of public adequacy

* ~~Lillian Martino~~
~~Jack DeBore~~

Bacchus letter ??

George - adm issues
Mike Levy - Serbia

→ Dick Farina 11/1 - }
Ken Schmalzbach }

- Jack DeBore - Lan
→ Referrals did go out

* GAO spent a week in Dallas at ~~Burnside~~ last Aug. because of Burnside's complaint
- Concluded: internal fighting
Tom Hinder
didn't write up

~~Hechingers~~

HANSON
TREASURY

9/27/93

Mark Hington

1. Bill Bowden 874-5200 Dan Cooke

Jiff Gillespie

2. Ben Nye 22735
0200

{ * Bill Koelle
Madison

3. Dan Cooke - Call Ben Nye - Vacancies Act

4. Sir Cen - B. Bruh / Steve Knoll / Hope

5. Ken Schmalbach - Under Secretary / Enforcement

6. Josh Heiner / Mike Berg
Mary Street

7. Vic Kojas 21980

- 8. Steve Glover 212 870 8726

- 9. Valerie 212 870 8158

* 10. Celeste May 203 701 8452

- 11. Jim Alliston

- 12. Rick Carke

13. Bill Koelle 416-7577

* 14. Rick Sanders 395-4224 -
Asst. Leon Fuertth NSE

15. Ron Noble

- 16. Tom McGivern

draft +
cover memo

- to Leon (VP) ->
to NSE staff system to Pres.
for signature

fw
3/9/94

366

Dennis - Bill Miller

Bernie Nussbaum

Dan - McDougal -
Madison Savings

9/28/93

- 1. Bill Roelle / Dennis Cavanagh
- 2. Roger
- 3. Stanley Tate 736-9662
- 4. Tom McGovern
- 5. Bill Bowden
- 6. Leslie Strauss
- * ~~7. Bernie Nussbaum~~
- 8. Skip Hove
- 9. Mike Levy
- > 10. Chris Edley
- 11. Steve Glover 212-820-8724
- 12. Valerie Jacob 212 820 8158
- 13. Rick Carro
- 14. Ken Austin / Ed Cummings
- 15. ~~Rick Saunders~~
- 16. Frank Newman
- > 17. Dieter Ford 786-9662
- 18. Rick Carro - Superfund
- 19. Ellen Seidman 416-2802
- 20. Jeff Powell 514-2069
- * 21. Tom McGovern 22317
- 22. Bill Roelle / Skip

- Dennis - S. Tale's little
- CC meeting - GNY/Ag
- Buyer Jupiter
- Swiss Co.
- Keyholder
- Tax & procedure
- McCandless
- Subtrans sanctions
- FOIA - pers. notes
- Meeting issue
- Schwartzlauf
- Comp time
- Landmark Land
- Vacancies Act
- Allied Signal
- L. Hunt

Rick will take next
couple of days off -> will transfer at
end of pay period (Fri. or next Fri.)

#16 Report to Bill Roelle

10/19/94

4/1/93

1. Celeste May 703-761-8473
2. Stanley Tate
3. Christine Varney 456-6280
4. Bill Koelle 416-7579
5. Bill Bowden 874-5200
6. Rick Carro 21146
7. Ed Knight 20027
8. Ben Nye
9. John Bowman

HW
3/19/94

HANSON
TREASURY

10/6/93

- 1. ~~HBH~~
- 2. Celeste May
- 3. Steve Katzanos
- 4. ~~Wendy Tate~~ 786 9608
Deloitte / Celeste
- 5. Coors - Memo for Secretary
Bob McNamara
- 6. McCandless - Sec's response
- 7. Al Byrne
310 / 327 / 330
345 / paper for 45 at our cost of funds
320 - 330
- 8. Rick Aboussie 736-3022
- 9. Susan Levine
- 10. Mark Hington
- 11. Bill Bowden
- 14. Robin Gross
- 15. Chris Peacock
- 16. Josh Steiner - Ken Schmolybach
- health care funding
- 17. John Lowman
- * 18. Jan Piercey
- 19. Tom McSivern
- * 20. Bill Roelle - Sue Schmidt
Kansas City
- 21. Liliane Martino
- 22. Alan Raul - 789-6021 (awyer + heart)

Steve Katzanos
Rick Carro -
EPA
Inag Claims

Mark Hington - Tammy
Lawley

GAO - list of
volumes of
CFR

→ 9 chm. referrals

369

Jan
3/9/94

WATSON

Secure phone
evidence
move phone / file cabin

Justice letter - Jeff Powell 514-2069

Chris Edley / Murry
Changes - M Hingston

Waco - opening statement

~~Qs/As - Ken / Bob~~

FOIA - Ron / Ken / Bob

Personnel papers

Bernice - ~~Waco~~ McDougal / pledge

Sanctions - Ken Austin

Spuley Tate - 736-9662

Pick Carro - Superfund / Clean Air Act / Ex. Order

* IG - Bill Roelle

R. Abronssie - Contingent fees

Leslie Strauss

J. Booker 416-6925

Bacchus letter

~~Friday~~

~~D. G. [unclear]~~

Dennis - Stanley letter

Leslie Maddin

Choy

SAs?

~~J. H. [unclear]~~

~~Stovall 212-820-8726~~

Valerie Jacob 212-820-8158

X

Laurie 456-6280
Christine's Assistant

Radio

S Ct Aug - 10/4 Central Bk of Denver vs.

1st Interstate of Denver - auditing & abetting

Glion Curtis / R. Abronssie

Tom McGivern - McDougal / Madison Savings

- Bill Roelle / Glion Curtis

Celeste May
Ethics pledge
Sp. Asst.

6193

FDIC - Atlanta - liquidations -> new office
- Tom Rose - talked about end of November
Head of legal
Keith Seebolt - head of client side

* Timing - Bill Roelle

Union

AFGE Am. Fed. Gov't Emps
NTEU - FDIC union - Natl. Treas. Emp'us Union

* Transition plan issue

Crm referrals

- by Agmt, ^{*} crm coordinator reviews before it goes -> Kansas City - KC office - pls
- Anything ^{whenever} publicity / prominent officials / open banks - goes to Washington

(Glenn Curtis & Rogu/Frank)

NA? >

Bill Koelle
301-977-1738 (H)

→ IG → Jonathan
Fichter

Jamie Couch

Johnnie Booker 416-6925 Bryan Duputer
Christine Varney 456-6780

* Celeste May 703-761-8492 - Art Kusinski 416-7469

organizational chart
Stanley - pls/Skip/Oversight 786-9662
Board / Stay out of **Centrust**

Frank - John Bowman / staffing / Skip Hove

Fernie - RTC GC / pledge

Bill Koelle - Deloitte 416-7579

9 referrals - Request after sent to Justice

Rogu - Celeste

Bill Bowden 874-5200

- Donna Cunningham

- Rick Aboussie - Contingent fees

- Conflicts committee - suggested procedures

12 CFR 1606.3

* Personnel actions

Interagency meetings

New executive order

Marubeni appeal
Iraq claims act

- brief filed by 10/18

Special Assistant
Chief Counsel
RTC Gen Counsel

→ Vetting process
Leslie

Liliane Martino

6188



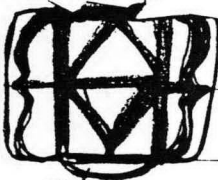
Robin

Lawyers Have Heart -

- H Raab - coordinating committee
- Honorary cochair -



H000008



9/27

Not an FTC official - have never
functioned as such. Because there
has been no general counsel

Briefed by Bill Poelle - He called
called me from time to
time on things that might
relate to press inquiries but
not for substantive advice.

Very first notice - knew nothing
of Madison
- Had not asked to be told

Talked to Roger - recalled names.
both recalled NY Times Article

H000009

Only thing I was doing was to
alert the White House
that there might be press
inquiries.

I assumed that Roelle
was giving me this info and
telling me to tell Roger,
and giving me this
information.

H000010

↳ Senior institutional
administration lawyer

Invited along because
legal matter

Respond to stories about the
president

■ H000012

Why did she attend the meeting with Jack DeVore?

The meeting was arranged by the press people to ~~to~~ discuss press inquiries. She was asked to ~~come~~ attend by the Treasury people who wanted their lawyer to ~~attend~~ present.

H000013