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FOIA RD 56806 (URTS 16302) DOCID:  
70104948

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription

3/7/94

FOIA(b)(6)

GEORGE MICHAEL PAYNE (white male born [redacted] was interviewed at his place of employment, ED'S SUPPLY CO., INC., 2300 Cantrell Road, Little Rock, Arkansas 72202, telephone number (501) 375-9851, by Special Agents [redacted] and [redacted] Federal Bureau of Investigation (FBI). Mr. PAYNE was advised that this interview concerned the alleged shredding of documents and files by the ROSE LAW FIRM, Little Rock, Arkansas.

Mr. PAYNE advised that his present residence address is P.O. Box 216, Vilonia, Arkansas 72173, telephone number (501) 796-2705.

Mr. PAYNE advised he is the co-owner of ED'S SUPPLY CO., INC., and his business is located next door to warehouse space leased by the ROSE LAW FIRM. He advised his business has been at this location since December 1990.

Mr. PAYNE advised he does not know any of the employees who work next door at the ROSE LAW FIRM. He stated he did not even know who was next door until a uniformed guard started showing up every day sometime in early 1992 (maybe March). He stated he does not know the identity of the guard company, but believes that the guards were in blue uniforms. He stated that the guards came in what he assumes were their personal cars as there were no markings on the vehicles. He advised that the guard service was there no more than six months.

Mr. PAYNE advised that sometime over a year ago, exact date unrecalled, he saw a BFI shredding truck backed up to the dock of the ROSE LAW FIRM next door. He stated that the truck was there for at least several hours. He stated he never saw any of the shredding being done nor does he have any idea what was being shredded. He advised he is sure the truck was a BFI truck because it was painted blue and white. He advised this was the first and only time he had seen a truck at the ROSE LAW FIRM.

cc - Oris - Subst  
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SEARCHED [initials] INDEXED [initials]  
SERIALIZED [initials] FILED [initials]  
MAR 07 1994

Investigation on 3/4/94 at Little Rock, Arkansas File # 29D-LR-35063

SA [redacted]  
by SA [redacted]

Date dictated 3/7/94

29D-LR-35063

Continuation of FD-302 of GEORGE MICHAEL PAYNE, On 3/4/94, Page 2

Mr. PAYNE advised he never saw a uniformed guard after the day this truck, as described above, was seen next door.

Mr. PAYNE provided the following information:

|        |                      |            |
|--------|----------------------|------------|
| Name   | GEORGE MICHAEL PAYNE | FOIA(b)(6) |
| Race   | White                |            |
| Sex    | Male                 |            |
| DOB    |                      |            |
| POB    |                      |            |
| SSAN   |                      |            |
| Height | 5'10"                |            |
| Weight | 180 pounds           |            |
| Hair   | Gray                 |            |
| Eyes   | Brown                |            |

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription 3/7/94

FOIA(b)(6)

ROBERT EVERETT LEE (white male born [redacted] was interviewed at the AUTO SPORTS CENTER, 2226 Cantrell Road, Cajuns Wharf Complex, Little Rock, Arkansas 72202, telephone number (501) 375-7223, by Special Agents [redacted] and [redacted] Federal Bureau of Investigation (FBI). Mr. LEE was advised that this interview concerned the alleged shredding of documents and files by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

Mr. LEE advised that his present residence address is 5 Cherry Tree Court, North Little Rock, Arkansas 72116, telephone number (501) 771-4421. He advised he is retired from the poultry production business.

Mr. LEE advised he is a regular customer of the AUTO SPORTS CENTER and, until about one and one-half years ago, did not know that the ROSE LAW FIRM occupied space two doors west of the AUTO SPORTS CENTER.

Mr. LEE advised that one day, date unrecalled, in 1992 he saw a uniformed guard at the space he now knows is leased by the ROSE LAW FIRM. He advised that a few months later, possibly September 1992, he saw a large blue and white BFI shredding truck backed up to the ROSE LAW FIRM dock. He advised that he did not see anyone working on or around the truck, nor does he have any idea what was being shredded. He stated he never saw a security guard there after the truck left. He stated he recalls the guard was wearing dark blue pants and a light blue shirt. He stated he does not know for which security company the guard worked.

Mr. LEE provided the following information:

|      |                    |
|------|--------------------|
| Name | ROBERT EVERETT LEE |
| Race | white              |
| Sex  | Male               |
| DOB  | [redacted]         |

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| MAR 07 1994       |         |
| FBI - LITTLE ROCK |         |

Investigation on 3/4/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 3/7/94

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29D-LR-35063

Continuation of FD-302 of ROBERT EVERETT LEE FOIA(b)(6) . On 3/4/94 . Page 2

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|--------|--|
| POB    | <span style="border: 1px solid black; display: inline-block; width: 150px; height: 1.2em; vertical-align: middle;"></span> |
| SSAN   |  |
| Height | 5'9"   |
| Weight | 185 pounds   |
| Hair   | Gray   |
| Eyes   | Blue   |

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

FOIA(b)(6)

Date of transcription

3/7/94

LEONARD JOSEPH LAMIA (white male born [redacted] was interviewed at his place of employment, AUTO SPORTS CENTER, 2226 Cantrell Road, Cajuns Wharf Complex, Little Rock, Arkansas 72202, telephone number (501) 375-7223, by Special Agents [redacted] and [redacted] Federal Bureau of Investigation (FBI). Mr. LAMIA was advised that this interview concerned the alleged shredding of documents and files by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

Mr. LAMIA advised that his present residence address is 6324 South Wind Drive, North Little Rock, Arkansas 72118, telephone number (501) 771-1591.

Mr. LAMIA advised he is the owner of the AUTO SPORTS CENTER, and his business is located two doors east of the warehouse space leased by the ROSE LAW FIRM. He advised his business has been at this location since February 1988.

Mr. LAMIA advised he has known for sometime that the space next to ED'S SUPPLY CO., INC., was leased by the ROSE LAW FIRM. He stated he has seen the women who work there, but has never met them. He stated he can recall seeing uniformed security guards working in that space in 1992, but does not recall anything about them.

Mr. LAMIA advised he recalls, that sometime in either September or October 1992 (prior to the 1992 Presidential election), there was a shredding truck backed up to the ROSE LAW FIRM dock. He stated it was a large "dumpster" type truck with a shredder on the back. He stated it was painted blue and white, and he thinks it was from BFI. He advised that he did not see anyone bringing anything out to the truck, nor does he have any idea what was being shredded. He stated he cannot recall how long the truck was there, but believes it was for several hours.

cc - OIG - Sub

Copy of [redacted]  
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| MAR 07 1994       |         |
| FBI - LITTLE ROCK |         |

Investigation on 3/4/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted]  
SA [redacted]

Date dictated 3/7/94

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29D-LR-35063

Continuation of FD-302 of LEONARD JOSEPH LAMIA, On 3/4/94, Page 2

Mr. LAMIA advised he did not see the guards again after the truck left. He stated this was the first and only time he can recall ever seeing a shredding truck at the ROSE LAW FIRM dock.

Mr. LAMIA provided the following information:

|        |  |
|--------|--|
| Name   | LEONARD JOSEPH LAMIA   |
| Race   | White  |
| Sex    | Male   |
| DOB    | <div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div>            |
| POB    | <div style="border: 1px solid black; width: 150px; height: 20px; display: inline-block;"></div> FOIA(b)(6) |
| SSAN   |  |
| Height | 5'7"   |
| Weight | 190 pounds   |
| Hair   | Gray   |
| Eyes   | Brown  |

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

FOIA(b)(7) - (C)

Date of transcription

3/7/94

HARRY ALAN WHEELER (white male, born [redacted] was interviewed at his place of business, ED'S SUPPLY CO., INC., 2300 Cantrell Road, Little Rock, Arkansas 72202, telephone number (501) 375-9851, by Special Agents [redacted] and [redacted] Federal Bureau of Investigation (FBI). Mr. WHEELER was advised that this interview concerned the alleged shredding of documents and files by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

Mr. WHEELER advised that his present residence address is 1115 Eastview Drive, Jacksonville, Arkansas 72076, telephone number (501) 982-0733.

Mr. WHEELER advised he is the technical services advisor for ED'S SUPPLY CO., INC., and his business is located next door to warehouse space leased by the ROSE LAW FIRM. He advised his employer has been at this location since December 1990.

Mr. WHEELER advised he recalls that, about March 1992 or shortly after the first Presidential primary, the ROSE LAW FIRM started having a uniformed guard on duty next door. He advised this was "round the clock" service. He stated he does not know which guard service it was, but thinks maybe the guards were in blue uniforms. He stated a guard continued to be on duty in the ROSE LAW FIRM space until about September or October 1992 when an alarm system was installed. He advised he does not know why the ROSE LAW FIRM would have wanted to use a guard service. He stated this warehouse district had not had any particular problems that would have warranted guard service.

Mr. WHEELER advised that in September or October 1992 he saw a blue and white BFI shredding services truck backed up to the ROSE LAW FIRM dock. He stated the truck was there most of the day. He stated he cannot recall hearing the shredder.

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| MAR 07 1994       |         |
| FBI - LITTLE ROCK |         |

Investigation on 3/4/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] SA [redacted] Date dictated 3/7/94

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29D-LR-35063

Continuation of FD-302 of HARRY ALAN WHEELER, On 3/4/94, Page 2

running, but assumes that it was. He advised he never saw any of the shredding being done, nor does he have any idea what was being shredded. He advised that this was the first and only time he has ever seen such a truck at the ROSE LAW FIRM.

Mr. WHEELER provided the following information:

|        |                                   |
|--------|-----------------------------------|
| Name   | HARRY ALAN WHEELER                |
| Race   | White                             |
| Sex    | Male                              |
| DOB    | [REDACTED]                        |
| POB    | [REDACTED] - - - - - [FOIA(b)(6)] |
| Height | 5'6"                              |
| Weight | 215 pounds                        |
| Hair   | Gray                              |
| Eyes   | Blue                              |

- 1 -

FEDERAL BUREAU OF INVESTIGATION

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

FOIA(b)(7) - (C)

Date of transcription 2/24/94

On 2/18/94, CATHY CAMPBELL, white female, was contacted at the ROSE LAW FIRM, 120 E. Fourth st., Little Rock, Ar. and advised of the identities of SAs [redacted] AND [redacted] [redacted] verbally and by display of credentials.

[redacted]

CAMPBELL was furnished a receipt for these documents and they were transported for storage at the FBI Office, Little Rock, Ar.

290-cl-35063 sub 11-27

cc: orig. sub A

Investigation on 2/18/94 at Little Rock, Ar. File # 29D-LR-35063  
by [redacted] Date dictated 2/24/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 10

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

FOIA(b)(7) - (C)

Date of transcription 2/23/94

DELORES ANN WALKER (white female born [redacted] was interviewed at the Little Rock Headquarters of the Federal Bureau of Investigation (FBI) by Associate Independent Counsel JULIE R. O'SULLIVAN and Special Agent [redacted] Ms. WALKER was advised that this interview concerned the alleged shredding of "Whitewater" documents at the ROSE LAW FIRM, Little Rock, Arkansas.

Present during this interview was Ms. WALKER's attorney, ALDEN L. ATKINS, of the firm of VINSON & ELKINS, L.L.P., the Willard Office Building, 1455 Pennsylvania Avenue, N.W., Washington, D.C., telephone number (202) 639-6613.

Ms. WALKER advised that her present residence address is 4720 South 78th East Place, Tulsa, Oklahoma 74145, telephone number (918) 665-2583. She stated she is currently employed as a clerk in the cash office of VENTURE, a Tulsa retail department store. She stated she started this employment two days ago.

Ms. WALKER advised she worked for the ROSE LAW FIRM from December 1986 until February 4, 1994, as a records clerk in the Firm's remote storage facility. She advised she was replaced in this position by her sister, BARBARA JEAN PERKINS.

Ms. WALKER advised that, when she was first hired, her original responsibility was to establish a central filing system. She stated she did this with another employee, RICKI STACEY, who was already working at the remote storage facility. She advised that later she was responsible for microfiching files maintained at the remote storage facility.

INDEXED FILED

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FBI - LITTLE ROCK

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Investigation on 2/22/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 2/23/94

29D-LR-35063

Continuation of FD-302 of DELORES ANN WALKER, On 2/22/94, Page 2

Ms. WALKER described the procedure for storing material at the remote storage facility. She stated a courier would bring boxes of material to be stored from the main office and put them in the warehouse area. She or Ms. STACEY would take the files out of the boxes, give each file a number, and put the files on the shelf for storage. She advised that a list was maintained by attorney's name of the documents and material in storage.

Ms. WALKER advised there was only one microfiche machine, and she was the only employee who used it.

Ms. WALKER advised that the lists would be sent to the attorneys who were responsible for marking the listed items either for destruction, shelving, or microfiching. She advised that, if they failed to mark an item, it was usually microfiched by default. She advised she and Ms. STACEY complied with the attorney's instructions. There was no system for review. She stated that, when she left the Firm, she was microfiching "accounting records," which microfiching she had started with the 1984 records. She advised she does not believe any "accounting records" before 1984 still exist.

Ms. WALKER advised she had nothing to do with the actual destruction of records. She stated that, after she or Ms. STACEY had pulled files marked by the attorney for destruction, they placed them in boxes. She advised that, when they had enough boxes for a "load," they would notify BOB BOUCHER, and he would pick them up. She advised that it was not her responsibility to decide what was to be destroyed. She stated she had nothing to do with the destruction of any files.

Ms. WALKER advised all the lists are maintained at the remote storage facility. She stated that Ms. STACEY had a list and she, Ms. WALKER, had a list. She stated Ms. STACEY's lists are more complete. She said there was no "master book" of lists. She stated all the attorneys would mark lists except for two or three of them. She stated these attorneys would have MARY RUSSELL call with their instructions. She stated that HILLARY CLINTON and VINCENT FOSTER always used written lists.

29D-LR-35063

Continuation of FD-302 of DELORES ANN WALKER, On 2/22/94, Page 3

Ms. WALKER advised that, when a marked list was returned by an attorney, she would comply with the instructions, i.e., microfiche, destroy, etc., then mark Ms. STACEY's copy in red ink indicating what she (Ms. WALKER) had done. She advised she would then keep the attorney-marked copy in her files. She stated she kept the lists in file folders in her filing cabinet. She advised the cabinet was not locked. She stated that most of the time there were only two people in the remote storage facility.

Ms. WALKER advised everything that came in or left the remote storage facility was logged in and out. She advised the log would show who called for a file, the date and time it was sent, and when it was returned. She stated that, when an item was returned, it was "highlighted" so that she and Ms. STACEY would know it had been returned.

Ms. WALKER advised she recalls that a day or two prior to February 3, 1994, some boxes were sent for destruction, but she does not know what they were. She stated that she assumes they were probably "accounting records."

Ms. WALKER advised she recalls getting HILLARY CLINTON's list back, and Ms. CLINTON had marked every item on the entire list. She advised she cannot recall how much was for destruction and how much was to be microfiched. She said that she does recall some of the items on her list were to be destroyed. She advised that this was in either 1988 or 1989. She stated she cannot recall seeing Ms. CLINTON's list since she, Ms. CLINTON, left the Firm.

Ms. WALKER advised that about that time (1988 or 1989) the Firm used an outside company to do all its shredding.

Ms. WALKER advised that she has no specific recollection of anyone's calling for any of Ms. CLINTON's files about the time of the Presidential election. She advised that there were occasions that CAROLYN HUBER might call for files, but she (Ms. WALKER) has no specific recollection of this. She stated she does not recall any of Ms. CLINTON's files being destroyed during the election period or since the election.

29D-LR-35063

Continuation of FD-302 of DELORES ANN WALKER, On 2/22/94, Page 4

Ms. WALKER advised she got VINCENT FOSTER's marked list from MARY RUSSELL about the time FOSTER left the Firm. She stated FOSTER had a "very large" list. She stated she cannot recall how much was to be microfiched and how much was to be destroyed. She advised that her recollection is that FOSTER did not want much done to his files except to store them.

Ms. WALKER advised that, after FOSTER's death in July 1993, there were calls for a few of his files. She stated Ms. STACEY would have handled that. She stated any files sent to the main office would have been logged out, and the log would show if any of them had been returned. She stated she does not know who might have requested the files, nor does she know the subject matter of those files. She advised she does not recall any destruction of FOSTER's records after his death.

Ms. WALKER advised she does not recall ever hearing of "Whitewater" until a couple of months ago. She stated she does recall seeing the name MADISON GUARANTY SAVINGS & LOAN (MGSL) on Ms. CLINTON's list. She advised she and Ms. STACEY were instructed to make a search for any files relating to the RESOLUTION TRUST CORPORATION (RTC), MGSL, and another unrecalled file. She stated that it was probably a day or two later that she and Ms. STACEY were told to also search for "Whitewater" material. She stated she does not recall ever finding any "Whitewater" material.

Ms. WALKER was shown a copy of a page from the list of HILLARY CLINTON. She stated this was a copy of the list maintained by Ms. STACEY, and the items listed on this page related to MGSL. She stated that the "D" on the list was made by her and indicated to Ms. STACEY that those files had been destroyed. She advised that, when she was searching for MGSL files, she double-checked her "CLINTON" list (the one actually marked by Ms. CLINTON) to make sure she had complied with all instructions. She advised that a few days later she tried to locate the above-noted page, but discovered it was missing. She advised this is the only page from the "CLINTON" list which is missing. She speculated that it may have inadvertently been put in another attorney's list file.

29D-LR-35063

Continuation of FD-302 of DELORES ANN WALKER, On 2/22/94, Page 5

Ms. WALKER advised that, when KATHY HARRIS joined the Firm, she, Ms. HARRIS, requested that she receive copies of the attorney lists. Ms. WALKER advised she sent lists to Ms. HARRIS two or three times, but then she got busy and did not continue the practice.

Ms. WALKER advised that no one else in the Firm except Ms. STACEY and Ms. HARRIS knows how she handled the lists.

Ms. WALKER advised that the remote storage facility was kept locked when she and Ms. STACEY were not there. She advised that the facility was alarmed and that she, Ms. STACEY, and BOUCHER had keys for the alarm system. She stated that Ms. PERKINS now has access. She advised that RANDY (LNU) used to come over and work in the facility, and, of course, he had access to the facility.

Ms. WALKER provided the following information:

|        |                       |
|--------|-----------------------|
| Name   | DELORES ANN WALKER    |
| Race   | White                 |
| Sex    | Female                |
| DOB    | [REDACTED] FOIA(b)(6) |
| POB    |                       |
| SSAN   |                       |
| Height | 5'3"                  |
| Weight | 155 pounds            |
| Hair   | Red                   |
| Eyes   | Brown                 |

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription 2/16/94

GARLAND JEROME GARRETT, also known as (aka) GARY GARRETT, voluntarily appeared at the Little Rock Office of the Federal Bureau of Investigation accompanied by his attorney, C. MICHAEL BUXTON, VINSON AND ELKINS LAW FIRM, Washington, D.C. PAT SMITH, Attorney with the Office of Special Counsel, introduced himself and Special Agent [redacted] GARRETT and BUXTON were familiar with the purpose of the requested interview, and Mr. GARRETT provided the following information:

In response to PAT SMITH's question, both GARRETT and BUXTON acknowledged that neither had a recording device, that the conversation was not being recorded by either of them. GARRETT acknowledged that he is a partner of the ROSE LAW FIRM, Little Rock, Arkansas, and has been a partner since 1985. He joined ROSE LAW FIRM approximately 13 1/2 years ago.

GARRETT advised that he has no personal policy for the retention or destruction of files related to his practice of law at the ROSE LAW FIRM. He further advised that there is no in-house policy at the ROSE LAW FIRM regarding the destruction or retention of files or documents with the decision regarding destruction or retention left to the individual attorney responsible for those files and documents.

GARRETT stated that in September or October, 1993, he physically changed office space within the ROSE LAW FIRM. At that time, he was aware that he would have less file space in the new office and, within one month after moving to the new office space, he completed a review of all files and documents which were under his personal control and responsibility, purging some of those documents, marking others for "remote storage," and moving the remainder to the new office space file area. Those documents which GARRETT marked "TO BE PURGED" were "to be thrown away as marked."

*cc: Dir. Sub A  
copy sub 11*

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Investigation on 2/16/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 2/16/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 16

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29D-LR-35063

Continuation of FD-302 of GARLAND JEROME GARRETT, On 2/16/94, Page 2

It was GARRETT's best recollection that this file review process was completed within one month after his moving to new office space in September or October, 1993.

In response to a specific question regarding whether any of the files which were reviewed and marked for destruction, storage, or removal to new office space involved HILLARY RODHAM CLINTON, GARRETT stated that he had worked on nothing with Mrs. CLINTON. He continued by specifying those documents which were "thrown away" were primarily files pertinent to the ROSE LAW FIRM and gave as examples minutes of meetings, recruiting information from various memorandums, and firm financial information referring to the ROSE LAW FIRM.

GARRETT stated that HILLARY CLINTON's name was probably on documents in the files, but there was nothing particular in reference to HILLARY CLINTON.

It was GARRETT's recollection that none of those files or documents which he marked for removal or destruction pertained to WHITEWATER DEVELOPMENT CORPORATION, JAMES MC DOUGAL, SUSAN MC DOUGAL, MADISON GUARANTY SAVINGS AND LOAN (MGS&L), or VINCE and/or LISA FOSTER.

GARRETT responded in the negative when questioned whether any of the documents which were marked for removal or destruction were documents pertinent to VINCE FOSTER and FOSTER's work relative to the WWDC, JAMES and SUSAN MC DOUGAL, MGS&L, or President and Mrs. CLINTON. GARRETT reiterated that those documents which were "thrown away" related primarily to the ROSE LAW FIRM business rather than to specific files.

When questioned by SMITH regarding the destruction or removal of any documents in GARRETT's possession relating to WWDC, MGS&L, DAVID HALE, or JIM GUY TUCKER, GARRETT responded, "No," and then clarified his response by stating that possibly there were documents pertinent to JIM GUY TUCKER which would relate to legal representation of clients but not pertinent any of the persons or entities previously listed. GARRETT also affirmed that he had no documents in his possession which were marked for destruction or storage relative to Castle Grande or South Loop.

29D-LR-35063

Continuation of FD-302 of GARLAND JEROME GARRETT, On 2/16/94, Page 3

GARRETT identified ELISE MC SHAN, file clerk assigned to the commercial section of ROSE LAW FIRM, as the person who was given the assignment to comply with GARRETT's instructions for removal and/or destruction of the documents and files. GARRETT stated that since January 1, 1994, he has not directed ELISE MC SHAN or anyone else to shred any documents. Specifically, GARRETT stated he does not know of any shredding or other disposal of documents or files at ROSE LAW FIRM pertinent to President and Mrs. CLINTON, VINCE and LISA FOSTER, DAVID HALE, JIM GUY TUCKER, WWDC, or MGS&L.

It was GARRETT's recollection that the article in the Washington Times that referred to the destruction of WWDC documents by employees of the ROSE LAW FIRM led to only discussions at firm meetings and private conversations with other ROSE LAW FIRM attorneys wherein the general opinion was that couriers for the ROSE LAW FIRM must have talked to reporters. GARRETT stated that was only a theory as to how the information may have reached the Washington Times reporter, and he could not recall specifically who offered the theory regarding the couriers talking to reporters.

GARRETT, in response to a specific question, advised that, through conjecture, speculation, and rumors at the ROSE LAW FIRM, a courier, "CLAYTON" may be the courier who had spoken with the Washington Times reporter. GARRETT could not identify any disgruntled or recently dismissed employees or any employee who had voluntarily left the ROSE LAW FIRM in the recent past. GARRETT could not identify any firm employee or attorney by name who would fit the category of disgruntled or recently dismissed employees or employees who had voluntarily separated from the firm. GARRETT stated that he has not talked to any newspaper reporter or any member of the press about the alleged "shredding" of documents at the ROSE LAW FIRM.

GARRETT stated that prior to January 1, 1994, he did have some documents shredded. That shredding was done by ELISE MC SHAN with the total compilation of files and documents shredded being the contents of one or possibly one and a half file drawers, each drawer being approximately three feet deep. GARRETT stated that this was done when he moved to his new office space, which corresponded with the leaving of the ROSE LAW FIRM by ALLEN BYRD. GARRETT stated that the latest date that ELISE

29D-LR-35063

Continuation of FD-302 of GARLAND JEROME GARRETT, On 2/16/94, Page 4

MC SHAN would have probably completed the destruction and removal of documents would have been mid-November, 1993. GARRETT could not recall the exact length of time that ELISE MC SHAN was involved in the cataloging and destruction of files but, at the outside, he felt that two months was a reasonable guess on his part. GARRETT issued no specific instructions to ELISE MC SHAN to "shred" documents but rather instructed her to "trash" the documents and files. He stated that he placed yellow "sticky" papers to the outside of the file drawers with instructions to "remote," "trash," or to relocate to his new office space. He recalled that the "yellow stickies" remained on the outside file drawers for some period of time but were not in place on January 1, 1994, as he recalled various members of the firm commenting to him regarding the "yellow stickies" on the file cabinets. He was certain those were removed prior to January 1, 1994.

GARRETT stated that the ROSE LAW FIRM does have a policy regarding the shredding or "trashing" of confidential documents, that being that those documents are to be shredded; however, he does not know if ELISE MC SHAN is aware of that policy regarding the destruction of "confidential" documents. He would not expect ELISE MC SHAN to know the policy regarding the destruction of documents, specifically whether they were to be placed in a trash bag or run through a shredder.

GARRETT concluded his comments by stating that he has no other information pertinent to the allegation printed in the Washington Times, specifically regarding the allegation of recent shredding of WWDC documents by employees of the ROSE LAW FIRM.

GARLAND JEROME GARRETT, aka GARY GARRETT, is a white male, date of birth [REDACTED] place of birth [REDACTED]. He is an attorney and a partner at the ROSE LAW FIRM, Little Rock, Arkansas, having been employed by that firm for approximately 13 1/2 years. He is assigned in the commercial section of the firm. GARRETT has been a partner in the ROSE LAW FIRM since 1985. He resides at 4114 Longtree Cove, Little Rock, Arkansas, home telephone number (501) 868-4022. GARRETT was represented by C. MICHAEL BUXTON, attorney for the VINSON AND ELKINS LAW FIRM, Washington, D.C., telephone number (202) 639-6571.

FOIA(b)(6)

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

FOIA(b)(6)

Date of transcription 2/16/94

VELMA RUTH STACY, also known as RICKI, white female, date of birth [redacted] place of birth [redacted] Social Security Account Number (SSAN) [redacted] who is employed as a records clerk for the ROSE LAW FIRM at that firm's records storage facility located at 2304 Cantrell Road, Little Rock, Arkansas, voluntarily appeared at about 11:45 A.M. with her attorney, C. MICHAEL BUXTON, at the office of the Federal Bureau of Investigation (FBI), Little Rock, Arkansas, wherein at the outset the persons interviewing her identified themselves as [redacted] and [redacted] Special Agents for the FBI, at which time STACY provided the following information voluntarily:

She has been employed at this facility in her current position since about July 8, 1986, and throughout her tenure with this firm, she has had no change in employment location, job title, or duties performed.

She was previously employed as a records clerk for the law firm of WRIGHT, LINDSEY, AND JENNINGS at Little Rock for six years. Previous to that, she was employed for about one year at the LINCOLN NATIONAL INSURANCE COMPANY, Little Rock, Arkansas.

Her immediate supervisor in her current employment is KATHY HARRIS.

Her normal work day is from 8:30 A.M. until 5:00 P.M., and she reports daily to the records storage facility. Her duties consist primarily of marking and indexing attorney/client files for storage, retrieval, or destruction.

As such, she routinely receives boxes of closed files which are brought to her location on an intermittent basis usually by BOB BOUCHER, the maintenance supervisor for the ROSE LAW FIRM, but, on occasion, one or more couriers employed by this firm may bring them to the storage facility and provide such records to STACY. When such records are delivered by these

*no orig. sent to sub A 2/17/93 cy*  
 Investigation on 2/15/94 at Little Rock, Arkansas File # 29D-LR-35063 *511-11*

by SA [redacted] SA [redacted]

Date dictated 2/15/94

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 SERIALIZED [ ] FILED [ ]  
 FEB 16 1994  
 FBI - LITTLE ROCK  
*[Handwritten initials]*

29D-LR-35063

Continuation of FD-302 of VELMA RUTH STACY, On 2/15/94, Page 2

individuals to STACY, they may consist of as few as one to four boxes at a time, and, on other occasions, they may consist of as many as forty or fifty boxes at a time. There also are days when no such records are received.

There is no accounting for these records on STACY's part in the context that STACY is not required nor does she sign a receipt or certification to her acceptance of such boxes of records; however, each attorney's secretary or file clerk is supposed to put a list in such boxes or attach such a list to each box or on other occasions when there are only a few boxes, BOUCHER or a courier will simply have the list on their person and provide it in person to STACY when such boxes of records are delivered to her.

There are occasions, very infrequently, when a list is inadvertently not placed in the box or attached to the box or provided in person to STACY, and, when STACY discovers this, she then contacts the attorney's secretary or clerk telephonically and informs them that such a list was not received by her at which time the list is then forwarded to her immediately.

Upon receipt of these boxes which contain the attorney's initials or name, date the records were prepared and/or placed in the box and the box number, STACY then takes that same information and compares it to the list contained in the box or attached thereto so as to insure its veracity.

The next procedure is that STACY will remove from each of these boxes the attorney/client files with reference to a specific client and attorney and place a retrieval/storage number on them.

When STACY first began her employment on about July 8, 1986, the very first box that she tagged had the number A0001, and she presently is in the range of C2500 Plus.

If a particular attorney/client file contains only one volume, then a number such as A0001 would be the only number attached to that single volume; however, in the event the particular file contains several volumes, then the number corresponding thereto would be A0001 for the first volume; A0001.1 for the second volume; A0001.2 for the third volume; etc.

29D-LR-35063

FOIA(b)(7) - (C)

Continuation of FD-302 of VELMA RUTH STACY, On 2/15/94, Page 3

CAROLYN HUBER is normally the person at the ROSE LAW FIRM who is responsible for logging in the date that the records to be sent to the storage facility were placed in the boxes or prepared, the attorney's name or initials, the number of boxes and is also responsible for insuring that the list describing what each box contains is placed in each box or attached thereto.

As STACY removes the various attorney/client files from the boxes in which they were received by her, she prepared, i.e., types a three-inch by five-inch reference card which card will contain the previously mentioned referenced numbers assigned for each particular case file and volumes, and the reference card will also contain the attorney's last name and the date that these records were placed in storage, and these cards are then filed in alphabetical order according to client's name in a file box maintained by STACY. Actually, Mrs. STACY had provided the information contained thus far herein to Special Agent (SA) [redacted] and SA [redacted] prior to the arrival of her attorney, C. MICHAEL BUXTON, who upon arrival, announced that he was STACY's attorney and advised that in order for this interview to continue, it would be necessary for him to be present.

At that point, STACY exclaimed, "Oh, yeah, I was supposed to tell you that I was not to be interviewed without my attorney being present, but I forgot to tell you this."

At this point, BUXTON and STACY met in private for approximately five minutes after which the interview continued, it being noted that BUXTON then informed SA PAYNE that, in private, he and STACY had had conversation wherein STACY had informed BUXTON of the information she had thus far provided, and, at this point, both BUXTON and STACY advised they were desirous of continuing the interview.

Next, STACY advised that the records maintained at her facility are for storage and/or retrieval and with few or if any exceptions are closed files.

There is not a shredder located at this facility, and no records have ever been shredded there except on rare occasions when a file containing no more than three or four pages may be retrieved and such pages are simply torn in pieces by STACY upon the authority of the attorney's secretary who has on occasion telephonically contacted STACY and told her to do so. On those

29D-LR-35063

Continuation of FD-302 of VELMA RUTH STACY, On 2/15/94, Page 4

occasions, STACY records on the reference card in her file box the date she did this and the name of the person directing or authorizing her to do so.

There are two ladies employed at this facility and the one other than STACY is currently BARBARA PERKINS who has been so employed for approximately the last three weeks. PERKINS replaced PERKINS's sister, ANNE WALKER, who had held the same job as PERKINS for several years.

It was WALKER's job, now that of PERKINS, to continuously take the records received and stored by STACY and place such records on microfiche after which such records are placed in a large box for destruction. These large boxes of records to be destroyed are then picked up by SMITH RECYCLING, Pine Bluff, Arkansas, to be shredded, and the shredded paper resulting therefrom is apparently then sold to area paper manufacturers for recycling.

During the eight years that STACY has been in her current employment, she can remember SMITH RECYCLING picking up records at her facility on only three occasions. One of those was within the last four weeks, and the other two were both in the calendar year 1993.

STACY can recall only one file as ever having been destroyed at her facility, and that was regarding an old estate, the identity of which she cannot recall.

No one has ever said or made statements to STACY to the effect that, "Send this file in here because I want to get rid of it."

In addition to the information previously mentioned herein that STACY places on the three by five inch file cards, she also utilizes the letters D, S, or M which means respectively destroy, save, or with respect to the M which means that the file hard copy may be destroyed after it has been microfiched.

STACY recalls that, on about February 1, 1994, KATHY HARRIS asked STACY to retrieve all documents at the storage facility with reference to WHITEWATER DEVELOPMENT COMPANY (WWD), MADISON GUARANTY SAVINGS AND LOAN (MGS&L), and BANK OF KINGSTON (BOK).

29D-LR-35063

Continuation of FD-302 of VELMA RUTH STACY, On 2/15/94, Page 5

STACY recalls that subsequent to this request by HARRIS, STACY was unable to locate any documents pertaining to WWD. STACY was able to locate "some little things" on MGS&L and BOK; however, she does not have any recollection as to what these items were. What ever they were, she retrieved them and provided them to HARRIS.

Prior to about February 1, 1994, there were perhaps as many as four times when someone at the ROSE LAW FIRM had asked STACY to retrieve documents pertaining to the BOK; however, STACY does not recall who made such requests, the dates such requests were made, or the documents that she retrieved.

Also, there was one instance prior to about February 1, 1994, wherein MARTHA BARNES at the ROSE LAW FIRM asked for "something to do with MGS&L;" however, STACY does not recall the document requested by BARNES nor does she recall the date of such a request.

STACY noted there has never been an instance during the tenure of her employment at the ROSE LAW FIRM wherein she has been requested or instructed to conceal or shred documents pertaining to WWD, MGS&L, BOK, VINCENT FOSTER, DAVID L. HALE, BILL CLINTON, or HILLARY CLINTON so as to prevent this information from being made available to a law enforcement agency, specifically, the FBI or to the "WHITEWATER Special Prosecutor's Office."

STACY noted that the building where she works is equipped with a burglar alarm system activated by a keypad which is alarmed by the last employee leaving each day and is disarmed by the first employee arriving the following day. STACY does not know whether an "edit slip" or other written record is generated each time the keypad is activated or deactivated. With reference to the MGS&L file that previously had been stored at STACY's facility, STACY recalls looking on STACY's list and observed a notation of "destroy per HILLARY" which to STACY meant that HILLARY CLINTON had authorized that particular file's destruction. However, STACY does not recall when such a notation was observed by her and does not recall whether that notation was in the handwriting of Mrs. CLINTON. It is STACY's best recollection that the file she is speaking about is one that was captioned, "MADISON VS. BABCOCK," and other MGS&L records except



29D-LR-35063

Continuation of FD-302 of VELMA RUTH STACY, On 2/15/94, Page 6

for MADISON vs. BABCOCK should still be stored at STACY's facility.

With reference to the "MADISON vs. BABCOCK" file, it is STACY's impression that HILLARY CLINTON would have either destroyed it while she had possession of that file or it would have been placed back in the box at STACY's facility to go to recycling.

With reference to the previously mentioned retrieval coding system utilized by STACY, there were occasions when a file would arrive for storage but there would be one or more volumes of that file missing in that the law firm would still be working on those particular volumes, and in those instances, STACY would leave the appropriate decimal point number open for that volume until it arrived and then it would be affixed thereto so as to insure a numerically ordered completion of all volumes to the file.

Also, within the past few weeks, STACY remembers BOB BOUCHER saying to STACY, "We don't have all of VINCE FOSTER's stuff yet."

At the time this comment was made, it was in response to a situation wherein one or more volumes of a VINCE FOSTER file delivered for storage by BOUCHER was missing.

Also with reference to the destruction by STACY at her location of a file containing only a few pieces of paper, STACY specifically recalls an instance where LOU ROBINSON telephonically contacted STACY and said, "RICKI, this has only one piece of paper in it. Destroy it." At that time, STACY simply removed the file containing only the one piece of paper and tore it up.

STACY recalls that within approximately the past week, perhaps February 9, 1994, an article appeared in the "Washington Times" newspaper alleging the shredding of WWD documents by the ROSE LAW FIRM, and, shortly thereafter, RON CLARK, the managing partner, had a meeting with the employees of that firm at which time he advised them that certain of them might be receiving a request by the Special Prosecutor's Office to make themselves available for an interview, and he advised that, "You will be

29D-LR-35063

FOIA(b)(7) - (C)

Continuation of FD-302 of

VELMA RUTH STACY

On

2/15/94

Page

7

represented by an attorney in the event you receive such a request."

CLARK also advised the employees that in the event their interviews were requested by the Special Prosecutor, then they should answer truthfully all questions asked of them in that regard.

At this point, STACY was asked again by SA [redacted] if she had requested C. MICHAEL BUXTON to represent her as [redacted] had previously been informed by BUXTON at which point BUXTON injected, "RICKY, didn't you and I meet together yesterday?" STACY replied, "Yes." Then BUXTON said to STACY, "And at that time didn't I ask you if you wanted me to represent you and didn't you say yes?" STACY responded in SA [redacted] presence by saying, "Yes" in regards to the questions interjected by BUXTON. Then [redacted] asked STACY, "Has anyone ever told you that you could have an attorney of your choice as opposed to one hired by the law firm where you are employed?" STACY replied, "No."

At this point, the interview was concluded at which time Mr. BUXTON provided his business card which contains the name of C. MICHAEL BUXTON, VINSON AND ELKINS, L.L.T., The Willard Office Building, 1455 Pennsylvania Avenue NW, Washington, D. C. 20004-1008, business telephone number (202) 639-6571, facsimile copier telephone number (202) 639-6604.

This interview concluded at 1:02 P.M.

FOIA(b)(7) - (C)

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription

2/15/94

TERESA MARIE LOGUE (white female born [redacted] was interviewed at the Little Rock Headquarters of the Federal Bureau of Investigation (FBI) by Associate Independent Counsel PATRICK U. SMITH and Special Agent [redacted]. She was advised that this interview concerned the alleged shredding of "Whitewater" documents at the ROSE LAW FIRM, Little Rock, Arkansas.

Present during this interview was Ms. LOGUE's attorney, ALDEN L. ATKINS, of the firm of VINSON & ELKINS, L.L.P., the Willard Office Building, 1455 Pennsylvania Avenue, N.W., Washington, D.C., telephone number (202) 639-6613.

Ms. LOGUE advised that her present residence address is P.O. Box 386, Beebe, Arkansas 72012, telephone number (501) 882-3134.

Ms. LOGUE advised she is presently employed as a file clerk by the ROSE LAW FIRM and has been so employed since August 1987. She advised that her business telephone number is (501) 375-9131, ext. 658.

Ms. LOGUE advised her duties as a file clerk include, but are not limited to, filing, making copies, making file labels, finding files, and going for coffee. She stated her supervisor is SHERRY BYRNE, secretary. Ms. LOGUE advised she does not have any subordinates. She stated that other people in the Firm also tell her what to do.

Ms. LOGUE advised she is very familiar with the Firm's filing system. She advised that files are indexed on a "files list" by client and subject matter. She stated that, about three years ago, they started adding the attorney's name to the lower right corner of the file label. She stated the files are stored in file cabinets. She advised that files which are sent to

INDEXED FILED

FEB 15 1994

FBI - LITTLE ROCK

Investigation on

2/15/94

at Little Rock, Arkansas

File #

29D-LR-35063

by SA [redacted]

Date dictated

2/15/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 27

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29D-LR-35063

Continuation of FD-302 of TERESA MARIE LOGUE, On 2/15/94, Page 2

"remote storage" are placed in boxes with an index list for each box. One copy of the list stays with each box, and the other is maintained at the main office. She advised that the list is also stored in the computer.

Ms. LOGUE advised it is not her job to shred or otherwise destroy any documents, files, etc., at the Firm. She stated that attorneys or secretaries make that decision. She stated couriers are given the material to be destroyed, and the couriers are responsible for shredding the material. She advised that the only time she might send something for destruction is if she messes something up in the copy room and puts it in the "shred box."

Ms. LOGUE advised that, on the day an article about the Firm appeared in the "Washington Times" concerning shredding of "Whitewater" records at the Firm, she learned about the article through "office gossip." She advised that on that day (she believes it was Wednesday, February 9, 1994) RON CLARK called a meeting at the Firm to tell them about the article and to instruct all employees to come forward if they knew anything about improper file destruction taking place. She stated Mr. CLARK asked them if anyone knew who did it. She stated that she did not know anything.

Ms. LOGUE advised there was another meeting yesterday, Monday, February 14, 1994, at the Firm. She stated Mr. CLARK told her and several other employees they would be going to the FBI office to be interviewed concerning the "Washington Times" story. She stated that he (CLARK) told them they could have their attorneys present during interview. She stated she did not ask for one at that time, but later decided she did want an attorney present during the interview. She stated no fee was discussed.

Ms. LOGUE advised she has not been contacted by anyone in the news media concerning this story or any other relating to "Whitewater" or any other matter. She stated she has never contacted anyone in the new media concerning any matter.

29D-LR-35063

Continuation of FD-302 of TERESA MARIE LOGUE, On 2/15/94, Page 3

Ms. LOGUE advised she has not destroyed, recycled, or disposed of any files, records, or computer records, nor does she know of any destruction, recycling, or disposal of any files, records, or computer records concerning the following:

- VINCENT or LISA FOSTER
- BILL CLINTON
- HILLARY CLINTON
- WHITEWATER DEVELOPMENT
- MADISON GUARANTY SAVINGS AND LOAN
- JIM GUY TUCKER
- DAVID HALE

Ms. LOGUE advised that, now that she is fully aware of the Government's interest in this matter, she will report any destruction of files which she believes might be of interest to the Independent Counsel.

Ms. LOGUE provided the following information:

|   |   |   |
|---|---|---|
| <p>///</p> <p>Name</p> <p>Race</p> <p>Sex</p> <p>DOB</p> <p>POB</p> <p>SSAN</p> <p>Height</p> <p>Weight</p> <p>Hair</p> <p>Eyes</p> | <p>TERESA MARIE LOGUE</p> <p>White</p> <p>Female</p> <div style="border: 1px solid black; width: 150px; height: 30px; margin-bottom: 5px;"></div> <p>5'6"</p> <p>138 pounds</p> <p>Brown</p> <p>Hazel</p> | <p>-----</p> <div style="border: 1px solid black; padding: 2px;">FOIA(b)(6)</div> |
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ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 02/15/94 BY 60322/UC/BAW

FOIA(b)(7) - (C)

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription

2/15/94

BARBARA JEAN PERKINS (white female born [redacted] was interviewed at the Little Rock Headquarters of the Federal Bureau of Investigation (FBI) by Associate Independent Counsel PATRICK J. SMITH and Special Agent [redacted]. She was advised that this interview concerned the alleged shredding of "Whitewater" documents at the ROSE LAW FIRM, Little Rock, Arkansas.

Present during this interview was Ms. PERKINS's attorney, ALDEN L. ATKINS, of the firm of VINSON & ELKINS, L.L.P., the Willard Office Building, 1455 Pennsylvania Avenue, N.W., Washington, D.C., telephone number (202) 639-6613.

Ms. PERKINS advised that her present residence address is 1927 Linda Lane, Jacksonville, Arkansas 72076, telephone number (501) 982-1735.

Ms. PERKINS advised she is presently employed as a records clerk at the remote storage facility of the ROSE LAW FIRM and has been so employed since January 26, 1994. She advised that the remote storage facility is located at 2407 Cantrell Road, Little Rock, Arkansas, and her business telephone number is (501) 375-8929.

Ms. PERKINS advised she was unemployed from 1989 until she took the job with the ROSE LAW FIRM. She stated she replaced her sister, DELORES ANN WALKER, who had the job before her.

Ms. PERKINS advised her duties include, but are not limited to, filing, copying, microfilming, and locating files. She advised she works with RICKI STACEY. Ms. PERKINS advised she does not have any subordinates.

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SERIALIZED [initials] FILED [initials]  
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FBI - LITTLE ROCK

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*K. Olig. in Sub A 2/17/93*  
Investigation on 2/15/94 at Little Rock, Arkansas File # 29D-LR-35063  
by SA [redacted] Date dictated 2/15/94

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29D-LR-35063

Continuation of FD-302 of BARBARA JEAN PERKINS . On 2/15/94 . Page 2

Ms. PERKINS advised she and Ms. STACEY make lists of documents and materials at the remote storage facility, and then the attorneys decide what can be destroyed and what needs to be put on microfilm. She stated that all materials in the facility must be logged in and out. She advised all the materials in the facility are filed by attorneys' names.

Ms. PERKINS advised that BOB BOUCHER brought some files over for recycling about a week prior to the "Washington Times" story. She stated the files were just put in the warehouse.

Ms. PERKINS advised she first heard about the "Washington Times" article from her husband and Ms. STACEY. She stated that she did not actually read the story.

Ms. PERKINS advised that an employee meeting with RON CLARK was held on February 9, 1994. She stated that he (CLARK) told the employees he did not want the Firm to be doing anything improper, and, if anyone knew anything about the story, he/she should come forward. She stated that CLARK seemed concerned. She stated that, during the meeting, CLARK said it is possible that some of VINCE FOSTER's "personal papers" may have been destroyed.

Ms. PERKINS advised she has not been contacted by the news media and has not made any contacts with the news media. She stated reporters have contacted Ms. STACEY, and it has upset her (Ms. STACEY). She stated that Ms. STACEY cannot understand how the reporters got her name and "number."

Ms. PERKINS advised she does not know anything about the matter under investigation.

Ms. PERKINS advised she has not destroyed, recycled, or disposed of any files, records, or computer records, nor does she know of any destruction, recycling, or disposal of any files, records, or computer records concerning the following:

VINCENT OR LISA FOSTER  
BILL OR HILLARY CLINTON  
WHITEWATER DEVELOPMENT  
MADISON GUARANTY SAVINGS AND LOAN  
JIM GUY TUCKER  
DAVID HALE

29D-LR-35063

Continuation of FD-302 of BARBARA JEAN PERKINS . On 2/15/94 . Page 3

Ms. PERKINS advised her sister or Ms. STACEY told her that some of HILLARY CLINTON's files were destroyed a long time ago at HILLARY CLINTON's request. She stated she does not know what files or how much may have been involved. She stated this is only hearsay.

Ms. PERKINS advised that, now that she is fully aware of the Government's interest in this matter, she will report any destruction of files which she believes might be of interest to the Independent Counsel.

Ms. PERKINS provided the following information:

|   |   |   |
|---|---|---|
| <p>///</p> <p>Name</p> <p>Race</p> <p>Sex</p> <p>DOB</p> <p>POB</p> <p>SSAN</p> <p>Height</p> <p>Weight</p> <p>Hair</p> <p>Eyes</p> | <p>BARBARA JEAN PERKINS</p> <p>White</p> <p>Female</p> <div style="border: 1px solid black; width: 150px; height: 30px; margin-bottom: 5px;"></div> <p>5'3"</p> <p>120 pounds</p> <p>Red</p> <p>Brown</p> | <p>-----</p> <div style="border: 1px solid black; padding: 2px;">FOIA(b)(6)</div> |
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FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription 2/16/94

On 2/15/94, L. D. BROWN, Corporal, Arkansas State Police, Special Investigations Division, Little Rock, Ar. was telephonically contacted by SA [redacted] in response to his attempt to call SA [redacted]

BROWN advised that since his interview with the FBI on 2/14/94, he had recalled the name of another individual who would probably have knowledge of the relationship of HILLARY RODHAM CLINTON and VINCENT FOSTER as well as the goings on in the ROSE LAW FIRM. He advised that individual is RITA HOOVER, who at one time worked for the ROSE LAW FIRM in an unknown capacity, however, BROWN thought she worked with the computers or records section. BROWN advised HOOVER is employed with the Judicial Task Force in Ashdown, Ar. He advised JIM STEELE is the prosecutor running this task force.

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*Orig. placed in sub A 3/17/93 [initials]* *290 LR 35063 2611-15*  
Investigation on 2/15/94 at Little Rock, Ar. File # 29D-LR-35063  
by SA [redacted] Date dictated 2/16/94

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

FOIA(b)(6)

Date of transcription 2/15/94

MARY KATHERINE VICK HARRIS, described as a white female, date of birth [redacted] whose residence is 1003 Shepherd Drive, White Hall, Arkansas 71602, telephone number (501) 247-5238, was interviewed at the Little Rock Office of the Federal Bureau of Investigation (FBI). HARRIS was represented in the interview by Attorney C. MICHAEL BUXTON, VINSON AND EDKINS LAW FIRM, L.L.F., The Willard Office Building, 1455 Pennsylvania Avenue, N.W., Washington, D. C. 20004-1008, telephone number (202) 639-6571 and facsimile number (202) 639-6604. BUXTON was present in the interview conducted by Associate Counsel PATRICK J. SMITH who identified himself and the nature of the interview. HARRIS was advised of the identity of Special Agent (SA) [redacted]

*(Handwritten mark: a circle with a checkmark and the initials "DM")*

HARRIS advised that the ROSE LAW FIRM was to pay for the legal services of her attorney, C. MICHAEL BUXTON, and she was advised of this by her superior, RONALD M. CLARK, attorney and senior member of the ROSE LAW FIRM as well as its chief operating officer. She advised that she was hired by CLARK to be the office manager of the ROSE LAW FIRM on January 15, 1993, and has held that position to the present time. She stated that, previous to her employment with ROSE LAW FIRM, she worked for the RESOLUTION TRUST CORPORATION (RTC) as a receiver for SAVERS FEDERAL from 1990 to July 6, 1992. She advised that, previous to that employment with RTC, she was an employee of SAVERS FEDERAL for twenty years, and her last position was corporate secretary and senior vice president.

HARRIS advised that those individuals who report to her are JOYCE LOUGHRIDGE, who is the accountant supervisor; LARRY SMITH, who is in charge of purchasing and the couriers; BOB BOUCHER, who is in charge of maintenance; MELBA THOMAS, who is in charge of the copy center; and RICK STACY and BARBARA PERKINS, who work at the remote storage warehouse on Cantrell Road near CAJUN'S WHARF RESTAURANT. She stated that a previous employee of the remote storage warehouse, ANN WALKER, moved to Tulsa, Oklahoma, due to the complications regarding custody of children following her daughter's divorce.

*orig. placed in sub A 2/16/93*  
 Investigation on 2/15/94 at Little Rock, Arkansas File # 29D-LR-35063-557 *35063-557-14*

by SA [redacted] Date dictated 2/15/94

*(Handwritten initials: DM, pl)*

29D-LR-35063

Continuation of FD-302 of MARY KATHERINE VICK HARRIS, On 2/15/94, Page 2

HARRIS was questioned regarding the document retention policy of the ROSE LAW FIRM, and she advised that she knows of no written policy. She stated that each attorney is responsible for the retention of his documents. She advised that the attorney may chose to keep the original document, microfilm the document, or destroy the document as he or she wishes. She advised that the attorney may chose to destroy the original document and not microfilm the original. HARRIS stated that a list of attorney files is maintained by the remote storage warehouse personnel.

HARRIS stated that, in October, 1993, she was asked by CLARK to collect any and all attorney files dealing with MADISON GUARANTY SAVINGS AND LOAN, the MC DOUGALS, and WHITEWATER. She stated that she used the attorney list of files as well as a fees list to determine any and all references to the areas that CLARK requested her to locate and collect. She advised that the remote warehouse storage personnel, STACY and PERKINS, helped her in that search. However, she advised that most of the work of collecting the documents was done by herself, and any heavy lifting or movement was done by BOUCHER. She stated that the documents were gathered and brought to the ROSE LAW FIRM and placed in a room located close to her office. She stated that the lists that she generated were placed on a computer, and the computer disk regarding her collection of documents is in existence. She stated that the only item that was not collected at that period of time was the FROST litigation that was held by Attorney RICK DONOVAN who apparently was working on that legal question at the time of the collection. She stated that she does not know whether the FROST documents were added to the inventory list, because she completed her work in November, 1993. She advised that she has a key to the office where the documents are collected, and CLARK may have a key. She has not checked recently if all of the documents that she gathered are still in the locked office. However, she stated that she does not know of any documents that have been removed from the locked office. She advised that a list of those documents is maintained by herself, the remote storage warehouse personnel, and a copy is a part of the documents in the locked office.

HARRIS stated that the document list of each attorney would identify the cases that particular attorney worked on at the ROSE LAW FIRM. She advised, in gathering the collected documents for the ROSE LAW FIRM, she noted that HILLARY RODHAM CLINTON's list showed that there were two MADISON GUARANTY

29D-LR-35063

Continuation of FD-302 of MARY KATHERINE VICK HARRIS, On 2/15/94, Page 3

SAVINGS AND LOAN files that were marked with "D's" which would indicate that they were destroyed. She stated that she believed that those files were destroyed before Mrs. CLINTON left the ROSE LAW FIRM. She advised that she remembers that the most collected evidence was regarding MADISON GUARANTY SAVINGS AND LOAN, and four to five attorneys had files on MADISON GUARANTY SAVINGS AND LOAN at the remote storage warehouse. She advised that she does not believe that she found any files regarding WHITEWATER. She stated that she does not remember any destroyed files listed on LISA FOSTER and/or VINCENT FOSTER's list. She advised that she checked both the remote storage warehouse and the inactive files that were still maintained at the ROSE LAW FIRM which were requested for collection by CLARK. She stated that she did not search the remote storage facility or the ROSE LAW FIRM for files dealing with DAVID L. HALE or JIM GUY TUCKER.

HARRIS stated that the shredding by the ROSE LAW FIRM couriers was usually done on a Tuesday or Thursday. She said that was routine, and LARRY SMITH usually directed who did the shredding, and she (HARRIS) did not witness any shredding. She stated that the handling of the documents for shredding was handled in two manners. She stated that the couriers collected documents, would then take them to the basement, and be shredded by one of the couriers or BOUCHER. She advised that the shredder is located in BOUCHER's office which is in reality a small storage room inside the ROSE LAW FIRM. She stated that she does have a master key to the building but has determined on several occasions that the master key does not open all doors in the firm. She advised that the larger volume of files would be taken to the remote storage warehouse where SMITH RECYCLING would come to the remote storage warehouse and remove the files for shredding. She stated that she started using the SMITH RECYCLING company in March or April of 1993. She stated that a secretary could call the courier to come get some documents to shred if it was needed. However, she does not know if that actually occurred where a secretary made a special request to shred documents. HARRIS further stated that she is not aware if any documents of the CLINTONS, LISA and/or VINCENT FOSTER, WHITEWATER, JIM GUY TUCKER, or DAVID L. HALE were shredded before October, 1993.

She stated that she is aware that a Federal Grand Jury subpoena was served  on the ROSE LAW FIRM and believes that CLARK told her about the subpoena; however, she may have heard it in an executive committee meeting of the ROSE LAW

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

29D-LR-35063

Continuation of FD-302 of MARY KATHERINE VICK HARRIS, On 2/15/94, Page 4

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

FIRM. She advised that the executive committee has met three to four times since January, 1994. She stated that members of the executive committee are RON CLARK; BRENT BUCK, treasurer; PHILIP CARROLL, member at large; and a representative from each section which are KEVIN BURNS, HERB RULE, JERRY JONES, and WILSON JONES. She further stated that CLARK has had no meeting with her regarding their response to the subpoena issued [REDACTED]

HARRIS advised that there was a staff meeting about a month ago in the morning about 8:30 which lasted from ten to fifteen minutes in which CLARK referred to the media coverage in the newspapers regarding WHITEWATER. CLARK told the staff that no one had done anything wrong, and they could not respond to the media because of client/attorney privilege. He further advised the staff that he was the spokes person, and the staff could not discuss anything with the media regarding WHITEWATER because of the privileged areas.

HARRIS stated that, on Wednesday, February 9, 1994, CLARK had a meeting in the morning with her, BOUCHER, and the couriers. CLARK reassured them that nothing had been done wrong, that document destruction should be reported, and to tell the truth when interviewed regarding the matter. CLARK did not ask directly if any files concerning the CLINTONS, FOSTER, WHITEWATER, or MADISON GUARANTY SAVINGS AND LOAN were destroyed; however, she believes that what he was saying was clear, and the couriers should have understood his meaning, but there was no response by anyone regarding destruction of files. She advised that CLARK did not ask anyone present at the meeting if they had talked to the newspaper. She advised that later that afternoon CLARK had a meeting with the rest of the staff of the firm.

She advised that she is aware that a meeting occurred on Friday, February 11, 1994, with the couriers and CLARK, but she was not present and does not know what was discussed at the meeting.

She advised that she had a meeting with CLARK on February 14, 1994, a Monday, in which CLARK told her that she was to be interviewed, she believed, by the FBI, and she should tell the truth along with the other file clerks who were going to be interviewed. She stated, other than the meetings mentioned, she has not been in any other meetings regarding the news accounts about WHITEWATER.

29D-LR-35063

Continuation of FD-302 of MARY KATHERINE VICK HARRIS, On 2/15/94, Page 5

HARRIS stated that she has had conversations with CLARK in a curious manner about who was the individual who told the "Washington Times" that the ROSE LAW FIRM had shredded WHITEWATER records. She stated that she believed it was a courier but does not know specifically who the individual was that talked to the "Washington Times." She advised that rumors are that CLAYTON LINDSEY and JEREMY HEDGES were the couriers that shredded the FOSTER box. She stated that she was told this by LARRY SMITH. She also stated that she has seen LINDSEY and HEDGES talking to CLARK outside of the meetings that they had had as a group. She stated that she does not know as fact that a box labeled as FOSTER's was shredded. Further, she commented that a box with an attorney's name on it is not unusual because sometimes boxes that are empty are used to carry other documents when, in fact, the documents in the box do not relate to the attorney's name on the box. Also, she advised that she knows of no shredding that occurred at the ROSE LAW FIRM after 4:30 P.M. Specifically, she does not know of any shredding on Thursday, February 3, 1994, after 4:30 P.M. In fact, she does not know of any shredding that goes on at night at the firm. She advised that BOUCHER informed her approximately two to three weeks ago that the TCBY litigation files which were a large shipment were sent to the remote storage facility, and they were to be picked up by SMITH RECYCLING. She stated their usual custom was to accumulate boxes to be shredded by SMITH RECYCLING, and it would take from two to three months to accumulate a normal shipping of approximately 500 pounds for shredding by SMITH RECYCLING. She advised that she is not sure if any other boxes were involved in the pickup by SMITH RECYCLING which involved the TCBY litigation.

Special Counsel SMITH advised HARRIS that a pending Federal Grand Jury subpoena has been issued for the records relating to President BILL CLINTON or Mrs. HILLARY RODHAM CLINTON, VINCENT or LISA FOSTER, WHITEWATER, MADISON GUARANTY SAVINGS AND LOAN, DAVID L. HALE, or JIM GUY TUCKER, and any shredding, alteration, or destruction of those records may be a violation of a Federal law involving Obstruction of Justice.

The following is a physical description of MARY KATHERINE VICK HARRIS:

|               |   |
|---------------|---|
| Race          | White   |
| Sex           | Female  |
| Date of Birth | <input type="text"/> - - - - - <input type="text"/> |

29D-LR-35063

FOIA(b)(6)

Continuation of FD-302 of

MARY KATHERINE VICK HARRIS

, On

2/15/94

, Page

6

Social Security  
Account Number (SSAN)   
Residence

1003 Shepherd Drive,  
White Hall, Arkansas 71602

Telephone Number  
Employment

(501) 247-5238  
Office Manager of ROSE LAW  
FIRM since January 15, 1993

Telephone Number  
Previous Employment

(501) 377-0353  
Twenty years employed SAVERS  
FEDERAL, Little Rock,  
Arkansas, last position  
being corporate secretary  
and senior vice president;  
RTC receiver for SAVERS  
FEDERAL from 1990 to  
July 6, 1992.

Attorney

C. MICHAEL BUXTON with the  
law firm of VINSON AND  
ELKINS, L.L.T., The Willard  
Office Building,  
1455 Pennsylvania Avenue,  
N.W., Washington, D.C.  
20004-1008

Telephone Number  
Facsimile Number

(202) 639-6571  
(202) 639-6604

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

FOIA(b)(6)

Date of transcription 2/13/94

CLIFTON TRYNAE WHITE, date of birth [redacted] black male, was advised of the identities of the interviewers, Special Counsel JULIE O'SULLIVAN and Special Agent (SA) [redacted] of the Federal Bureau of Investigation (FBI) and the purpose of the interview. WHITE was informed that the interview concerned incidents of shredding documents related to the current Whitewater investigation. WHITE was interviewed in the presence of his attorney, GREGORY KITTERMAN. WHITE furnished the following information:

X  
DFN

WHITE stated he works in Purchasing and Receiving, handles the mail on occasion, and performs some of the couriers' responsibilities. WHITE said that he reports to LARRY SMITH from whom he takes orders directly. WHITE also acknowledged that he receives orders from other administrative personnel including attorneys, secretaries, and CATHY HARRIS, LARRY SMITH's boss. WHITE said that he began employment at the ROSE LAW FIRM during the middle of December 1993. WHITE said he is still employed by the City of Little Rock as the receptionist at the WAR MEMORIAL FITNESS CENTER (Friday evenings). WHITE said he works at the ROSE LAW FIRM from 7:00 a.m. to 3:30 p.m. or 4:00 p.m. five days a week. WHITE advised that he is currently attending the University of Arkansas at Little Rock (UALR).

WHITE confirmed that he has on occasion shredded documents, usually when he filled in for the couriers.

WHITE explained that each person would be assigned a floor and go around to the offices to pick up documents to be shredded. WHITE stated that this activity was done on Tuesdays and Thursdays at no particular time during the day. WHITE went on to mention that approximately one month ago, shredding was done on an as-needed basis; employees would call to have documents shredded. WHITE said that he usually receives a box full of paper off a single floor. WHITE claimed that he never reads the material given to him to be shredded nor was he ever given a whole box of documents to be shredded.

Original placed in Sub A 2/17/93 [initials]  
Investigation on 2/12/94 at Little Rock, Arkansas File # 29D-IR-35063  
by SA [redacted] Date dictated 2/12/94

29D-IR-35063 Sub 11 - 12

DFN



29D-LR-35063

Continuation of FD-302 of CLIFTON TRYNAE WHITE, On 2/12/94, Page 2

WHITE said that he did not do any shredding one week ago Thursday. WHITE acknowledged that he was not asked to do shredding that day either. WHITE said that every courier was at work that day except JEREMY. WHITE assumed the couriers did shredding that day.

WHITE said that he does not recall staying late that Thursday or during the last two weeks. WHITE advised that he leaves work around 3:00 or 4:00 p.m. WHITE said that he leaves the firm first and the couriers are always still there.

WHITE stated that there is only one shredder at the ROSE LAW FIRM located in BOB BOUCHER's office. WHITE did not know who has the keys to BOUCHER's office but said that the door to his office is usually left open. WHITE was unaware if BOUCHER's office door is closed in the evening.

WHITE again confirmed that he did not do any shredding of documents that Thursday.

WHITE was asked about the Washington Times article alleging that an employee of the ROSE LAW FIRM shredded Whitewater documents. WHITE opined that the story in the newspaper had no credibility as far as he was concerned. WHITE did not talk to any employee about the alleged shredding nor did he hear talk about shredding of Whitewater documents.

WHITE did not recall anything unusual occurring at the firm on Friday. WHITE said that he did not do any shredding on Friday. WHITE said that he has not done any shredding since last Tuesday.

WHITE was asked if he has ever read documents related to the following persons/entities: Whitewater, VINCE FOSTER, BILL and HILLARY CLINTON, MADISON, JIM GUY TUCKER, and DAVID HALE. WHITE claimed that he has not read documents related to those persons/entities.

WHITE again confirmed that he has never received a box of documents to shred.

WHITE said that no one has ever mentioned in any meeting the shredding of Whitewater or VINCE FOSTER related documents.

29D-LR-35063

Continuation of FD-302 of CLIFTON TRYNAE WHITE, On 2/12/94, Page 3

On Wednesday around 7:30 a.m. to 7:45 a.m., WHITE learned of the Washington Times articles from the E-Mail on LARRY SMITH's computer terminal. WHITE said that RON CLARK posted a message on the E-Mail system regarding the article.

WHITE recalled a meeting of staff and secretaries (no attorneys) with CATHY HARRIS and RON CLARK occurring a couple of weeks or more prior to the Wednesday he observed the E-Mail message. WHITE said this meeting was called to allow employees to air their grievances and complaints. WHITE learned of this meeting through a memorandum. This meeting lasted approximately 15 minutes. WHITE mentioned that he heard the words "subpoena" and "served" and that documents were being gathered for Mr. FISKE. WHITE said he was not aware if FISKE was appointed at that time.

WHITE was asked whether any couriers expressed concern about shredding documents related to Whitewater or VINCE FOSTER.

WHITE said that he first read the actual Washington Times article when he observed a Xerox copy of the article at the couriers' station. WHITE thought the article was fantasy. WHITE read the article out loud in the presence of LARRY SMITH and JEREMY HEDGES. WHITE commented that the article did not seem right. WHITE claimed that the couriers are light-hearted people and that the "scared to death" part did not sound like them. WHITE did not think a lawyer talked with the reporter. WHITE believed the article's story was fabricated.

WHITE recalled a later meeting last Wednesday lasting five to ten minutes. WHITE said that the following firm employees were present: RON CLARK, BOB BOUCHER, LARRY SMITH, JEREMY HEDGES, CATHY HARRIS, MARK MC MAHON, and CLIFTON WHITE. WHITE said that CLARK spoke to the group and said that he had faith that no one had acted improperly. WHITE initially said that basically CLARK did not want people to talk to the press but then rescinded that statement. WHITE clarified CLARK's statement by stating that CLARK said people could talk to the press but to be aware that the press can switch around what they say. CLARK said that any press inquiries can be directed to himself. WHITE was asked if the FBI or Special Counsel was mentioned by CLARK. WHITE confirmed that CLARK did not mention these organizations in the meeting. According to WHITE, CLARK told everyone that, if

29D-LR-35063

Continuation of FD-302 of CLIFTON TRYNAE WHITE, On 2/12/94, Page 4

they had information concerning shredding, they could come to CLARK with the information.

WHITE said that he did not go to work Thursday. KIRK, a fellow employee, called WHITE at home requesting LARRY SMITH's telephone number. KIRK needed to call SMITH to let him know that he would not be at work. WHITE claimed that KIRK talked to him about the Arkansas-Kentucky game. WHITE said that he also called LARRY SMITH and informed SMITH that he was iced in. WHITE said he did not go to work Thursday. WHITE confirmed that he did not talk to KIRK about the newspaper article.

WHITE said that he learned of the meeting with the FBI at 10:00 a.m. on Friday from Mr. SMITH. WHITE noted that he came to work at 1:00 p.m. on Friday after he called LARRY SMITH earlier to advise him that he would be to work after the ice melted. At 2:00 p.m. on Friday, RON CLARK told WHITE that the FBI meeting had been canceled. CLARK suggested that WHITE tell the truth to the FBI and Special Counsel. According to WHITE, RON CLARK said that no one gave the authority to shred Whitewater documents and that they had no knowledge of shredding documents of concern.

WHITE stated that he does not have anything to do with SMITH RECYCLING or the law firm's computer system (deleting files).

WHITE said that he did not talk with the Washington Times.

WHITE mentioned that CLAYTON was contacted by a reporter. JEREMY HEDGES told a reporter, "No comment," and asked the reporter how he got his name.

WHITE was unaware of any increase in shredding activities at the firm. WHITE claimed to be unaware of the firm's deposition of documents. WHITE was unsure whether CLARK mentioned that counsel would be provided to those meeting with the FBI/Special Counsel.

[REDACTED]

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

29D-LR-35063

Continuation of FD-302 of CLIFTON TRYNAE WHITE, On 2/12/94, Page 5

WHITE provided the following pedigree information:

|                  |   |
|------------------|---|
| Name             | CLIFTON TRYNAE WHITE  |
| Home Address     | 1812 Reservoir Road, #276,<br>Little Rock, Arkansas             |
| Business Address | ROSE LAW FIRM,<br>120 East 4th Street,<br>Little Rock, Arkansas |
| Date of Birth    | <input type="text"/> - - - - - <input type="text"/>             |

FOIA(b)(6)

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

FOIA(b)(7) - (C)

Date of transcription 2/14/94

MARK WAYLAND MC MAHAN, described as a white male, date of birth [redacted] whose residence is 42 Master's Place, Maumelle, Arkansas 72113, telephone number (501) 851-2114, was interviewed at the Little Rock Office of the Federal Bureau of Investigation (FBI). MC MAHAN was represented in an interview by Attorney GREGORY KITTERMAN, 1101 Garland Street, Little Rock, Arkansas 72201, telephone number (501) 374-1145, and fax number (501) 375-9131. KITTERMAN was present in the interview conducted by Associate Counsel JULIE R. O'SULLIVAN who identified herself and the nature of the interview. MC MAHAN was advised of the identity of Special Agent (SA) [redacted]

MC MAHAN described his employment with the ROSE LAW FIRM as a courier. He stated that his duties consisted of running errands, both official and personal, for the attorneys of the firm, filing documents with the clerks of the local, state and Federal courts, as well as shredding documents. He stated that his usual work hours are on Monday, Wednesday, and Friday from 9:00 A.M. to 11:00 A.M. and from 2:00 P.M. to 5:00 P.M. as well as on Thursday and Friday at 12:00 P.M. after his morning class at the University of Arkansas at Little Rock (UALR). He advised that, on days that he had the mail run with FEDEX, he was at ROSE LAW FIRM until 6:15 P.M. or 6:30 P.M.

He stated his duties of shredding began with a notice in a courier box that he was assigned to the shredding. He stated that, on those days that he was shredding, he would go to the attorneys' offices and collect documents from the trash or containers set out by the attorneys for shredding. He advised that he collected the documents and put them in a box for transportation to the shredder. MC MAHAN stated that the average shredding was approximately one-half of a box to about three boxes per day. He said that the one-half box would take approximately fifteen minutes to shred, and the three boxes would take about 45 minutes to shred. He further stated that he has not shredded documents at night nor has anyone asked him to shred documents at night. He also advised that he knows of no one who

*no orig. in sub A*  
*cc: in main file, 2/17/93*  
Investigation on 2/12/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 11-12

by SA [redacted] Date dictated 2/12/94

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

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29D-LR-35063

Continuation of FD-302 of MARK WAYLAND MC MAHAN, On 2/12/94, Page 2

shredded documents at night at the firm. He further advised that he did not shred any documents on Thursday, February 3, 1994, and cannot recall any unusual activity regarding the shredding of the documents on February 3, 1994. He stated that he would have left work at the firm at 5:00 P.M. on February 3, 1994, if he did not have the mail run duty. He further advised that BOB BOUCHER, who is the janitor, locks his office at 4:30 P.M.; however, LARRY SMITH has a key to BOUCHER's office.

He stated that he does not look at the documents he shreds nor has he been asked to shred any documents or files reference MADISON GUARANTY SAVINGS AND LOAN, BILL or HILLARY CLINTON, WHITEWATER, or VINCENT FOSTER. He stated specifically that he was not asked to shred FOSTER's box. He stated that he does not know what documents attorneys ask to have shredded and did not know about an outside firm that did the shredding for ROSE LAW FIRM. He further advised that he was aware that there is a remote storage for the firm and has moved boxes to and from the remote storage facility. He said that he does not remember removing any boxes to and from the remote storage facility to ROSE LAW FIRM during the first week of February, 1994. He also stated that he knows of no other couriers who were moving boxes to the remote facility during that same time period.

He advised his immediate supervisor at ROSE LAW FIRM is LARRY SMITH who has had that position since December, 1993. His previous supervisor was MARY RUSSEL. SMITH is supervised by the managing partner of the firm, RON CLARK, and the office manager, KATHY HARRIS. MC MAHAN said that, on February 9, 1994, which was Wednesday, he came in the office around 9:00 A.M. It was at the office while talking to CURT FRIEBERG and LARRY SMITH that he was advised about the news article that appeared in the "Washington Times" newspaper regarding the shredding of WHITEWATER files. He was advised by SMITH that a meeting would be held that afternoon with CLARK, and, by that afternoon, he had read a photocopy of the "Washington Times" article about the shredding of the WHITEWATER files. He stated that he had no contact with CLARK before the meeting that was held on the afternoon of February 9, 1994.

The couriers had talked among themselves on February 9, 1994, about who might have told the "Washington Times" newspaper about the shredding of the documents. He stated that the people that he talked to that day were his best friend, CURT FRIEBERG,

29D-LR-35063

Continuation of FD-302 of MARK WAYLAND MC MAHAN, On 2/12/94, Page 3

and other couriers, CLAYTON LINDSEY, JEREMY HEDGES, and BRENT LEMEY. He advised that he did not contact the "Washington Times" newspaper or any other press regarding anything dealing with WHITEWATER, and the ROSE LAW FIRM has not asked him whether he had shred any WHITEWATER documents. He advised that CLAYTON LINDSEY and JEREMY HEDGES had discussed the fact that a box of documents with FOSTER's name on it was shredded about three weeks ago by them, and they mentioned it to him (MC MAHAN) the day that the shredding occurred. HEDGES also told him (MC MAHAN) that LINDSEY had received a telephone call from the "Washington Times" newspaper about WHITEWATER a couple of days before the date of February 9, 1994.

MC MAHAN stated that the couriers met with RON CLARK on Wednesday, February 9, 1994, and Friday, February 11, 1994, regarding the "Washington Times" article and the impending interviews by the Special Counsel's Office.

The Wednesday meeting with CLARK occurred about 10:00 A.M. and included BOUCHER, SMITH, and other couriers. CLARK told them that the ROSE LAW FIRM would deny that the shredding occurred. CLARK recommended that they not talk to the press. CLARK stated also that, if contacted by the press, they (couriers) should let CLARK know about the contact. MC MAHAN advised that CLARK did not mention a subpoena for FOSTER files but did say that the firm was saving FOSTER documents which were being stored in an office next to CLARK's office on the first floor of the firm.

He stated that the Friday meeting with CLARK began about 2:00 P.M. He advised that he came into the office about 10:30 A.M. MC MAHAN also stated that he did not come into the office on Thursday, February 10, 1994, because of the ice storm but was called by FRIEBERG on Thursday and told that there would be a meeting at the firm on Friday. Present in the Friday meeting was also Attorney JERRY JONES as well as CLARK and the couriers. CLARK advised the group that questions the FBI might ask would be concerning the process of shredding at ROSE LAW FIRM and the possible shredding of WHITEWATER files. MC MAHAN stated that CLARK told him and others in the meeting that they could have an attorney. MC MAHAN was asked if the ROSE LAW FIRM promised to pay for his (MC MAHAN's) attorney. Attorney KITTERMAN objected to the question citing client/attorney privilege regarding that information. MC MAHAN did not answer

29D-LR-35063

Continuation of FD-302 of MARK WAYLAND MC MAHAN, On 2/12/94, Page 4

the question of whether payment of the attorney was promised by ROSE LAW FIRM upon advice of his counsel.

He advised that he knows of no meeting on Thursday, February 10, 1994, and has no contact with the computer system of the ROSE LAW FIRM.

The following is a physical description of MARK WAYLAND MC MAHAN:

|                                       |  |
|---------------------------------------|--|
| Race                                  | White  |
| Sex                                   | Male   |
| Date of Birth                         | [REDACTED]   |
| Social Security Account Number (SSAN) | [REDACTED]   |
| Resides                               | 42 Master's Place,<br>Maumelle, Arkansas 72113   |
| Telephone Number                      | (501) 851-2114   |
| Present Employment                    | Courier, ROSE LAW FIRM, since<br>October, 1991   |
| Previous Employment                   | HI-BOY RESTAURANT, Maumelle,<br>Arkansas, summer, 1991   |
| Education                             | Graduate of Mc Clellan High<br>School, 1990  |
| Parents                               | WILLIE C. MC MAHAN and<br>MARY HELEN MC MAHAN,<br>42 Master's Place,<br>Maumelle, Arkansas 72113 |
| Telephone Number<br>Attorney          | (501) 851-2114<br>GREGORY KITTERMAN,<br>1101 Garland Street,<br>Little Rock, Arkansas 72201      |
| Telephone Number                      | (501) 374-1145   |
| Fax Number                            | (501) 375-9131   |

FOIA(b)(6)



- 1 -

## FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription 2/14/94

ROBERT PAUL BOUCHER appeared at the Little Rock Office of the Federal Bureau of Investigation (FBI) as scheduled at 4:00 P.M. and agreed to be interviewed. Mr. BOUCHER was advised of the identity of the interviewing Agent and of the purpose of the interview. Also present during the interview were JULIE O'SULLIVAN, and PAT SMITH, assistants to Special Counsel ROBERT FISKE. Mr. BOUCHER identified himself as having been born [redacted] at [redacted] and having Social Security Account Number (SSAN) [redacted]. He resides at Number 23 Dawn Court, Jacksonville, Arkansas, telephone number (501) 985-2360. His work telephone number is (501) 377-0403, and his beeper number is 399-1882.

Mr. BOUCHER stated that he has worked at the ROSE LAW FIRM since September, 1986, as maintenance supervisor. He works alone in his position as maintenance man, which includes duties such as fixing desks, chairs, and other general maintenance jobs. He stated that, prior to coming to ROSE LAW FIRM, he was an employee of the United States Air Force from which he retired at Little Rock Air Force Base in Jacksonville. He said that his normal working hours are Monday through Friday at ROSE LAW FIRM from 7:30 A.M. until 4:30 P.M. His immediate supervisor is KATHY HARRIS, whom he described as the office manager. He stated that he directly answers to her.

Mr. BOUCHER described ROSE LAW FIRM as having approximately 110 employees but explained that he was uncertain about this number. He stated they did have paralegals employed there. He described the basement area of the ROSE LAW FIRM building complex as having a shredding machine in his room or office. He stated that this was the only shredder in ROSE LAW FIRM office space. He stated that the basement also includes the break room or snack room which contains vending machines of various types, a photocopying room, and the accounting department. He said that there is also a full scale kitchen located in the basement. He described the shredding machine as a normal size machine which at one time takes no more than a

FOIA(b)(7) - (C)

Investigation on 2/11/94 at Little Rock, Arkansas File # 29D-LR-35063 S. L. 11-10

by SA [redacted] Date dictated 2/12/94

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29D-LR-35063

Continuation of FD-302 of ROBERT PAUL BOCHER, On 2/11/94, Page 2

quarter-inch stack of papers. He said any more than that would clog up the machine. He described the brand name of the machine as Intimass (phonetic). He said that the room containing the shredder is open during his normal working hours and is locked at night. He stated the only persons having a key to this room besides himself are KATHY HARRIS, his supervisor; RON CLARK, the managing partner of the law firm; and LARRY SMITH, the courier supervisor. He said that there is a security guard at the front door of the ROSE LAW FIRM building until 10:00 P.M. at night. There is also an alarm system on the glass areas of the building, and employees wishing to gain entry to the building after hours must use their own individual code on a keypad at the entrance. He stated that after-hours entries through use of the keypad are recorded on a computerized data bank in KATHY HARRIS' office. He stated that the two main doors, on Third Street and Fourth Street, open at 8:00 A.M. and close at either 5:00 or 6:00 P.M. He explained that the computer system recording the entries after hours by use of the keypad is on a separate data bank or computer system from the other computer system being used in the office. He stated that the only people having a master key for the entire ROSE LAW FIRM building complex are RON CLARK, KATHY HARRIS, LARRY SMITH, as well as he (BOUCHER).

He explained that the job of shredding papers was solely his job until about one and one-half to two years ago at which time couriers or messengers were assigned to do this job. He stated that couriers would pick up material to be shredded from each floor. He said that there was one card on each floor which was used to indicate that shredding needed to be done, and the couriers would then pick up the shredding. LARRY SMITH would take the cards and post them in the courier box to assign couriers to do the shredding. He added that there was a lock box on each floor. Employees would put more sensitive documents, particularly such as related to personnel matters, in these lock boxes for shredding. BOUCHER has the task of taking the material from the lock boxes and shredding this material himself. The lock boxes have been in place for at least two years. He said that there are no written instructions as to what items are to be put into the lock boxes but only a general understanding that anything of a more sensitive nature or something which one would not want others to see would be placed into a lock box. He said it would depend on individual lawyers as to what they thought was sensitive or not sensitive. He does not know of any type of policy regarding shredding which is written on paper. He stated

29D-LR-35063

Continuation of FD-302 of ROBERT PAUL BOCHER, On 2/11/94, Page 3

that shredding was being done on a daily basis during the day when his office was unlocked, and all shredding normally ceased by 4:00 P.M. because he would lock the door at that time.

Mr. BOUCHER described the couriers as far as he was aware of their names as MARK; BRENT, who is a fairly new employee; CLAYTON; KURT FRIEBERG; JEREMY HEDGES; and CLIFTON. He stated that CLIFTON also takes care of handling the mail runs.

Mr. BOUCHER stated that he is rarely in the room while shredding is going on because the machine is very noisy. He stated that LARRY SMITH's desk is right near the door to the room where the shredding is being done, and the door is normally closed during shredding because of the noise. After the bag in the shredding machine is full, it is then taken and placed in the dumpster. He said that the shredder destroys the papers in a crosscut fashion rather than vertically or perpendicular. He said items which are normally shredded are sheets of paper and, on some occasions, file covers.

Mr. BOUCHER stated that he last shredded on about Tuesday, a week ago (February 1, 1994). He is, however, unsure if it was on that particular day. He recalls that there was a lock box on the second floor which had documents in it to be shredded including photocopies which had turned out to be too dark. He said it may have included bond paper, but he could not be sure. There were no checks or files but only loose papers in that lock box. He added that this lock box on the second floor is in the copying room. He did not see anything related to WHITEWATER, BILL CLINTON, HILLARY CLINTON, MADISON GUARANTY SAVINGS AND LOAN, VINCENT FOSTER, or DAVID HALE in these papers, but he explained that he did not pay any attention to the papers and cannot say for sure what was on them.

He added that he hauled boxes to the remote storage area used by ROSE LAW FIRM on Monday or Tuesday of this week. He said that the remote storage area is on Cantrell Road near CAJUN'S WHARF. He believes the address is 2304 Cantrell Road. He said that, in this area, the firm maintains old files or closed cases. There are two ladies employed who work at this remote storage area. They are RIKI STACY and BARBARA PERKINS. He said PERKINS started to work about two weeks ago, replacing her sister, ANNE WALKER. He said that a company known to him as SMITH RECYCLING picks up boxes from their remote storage area for

29D-LR-35063

Continuation of FD-302 of ROBERT PAUL BOCHER, On 2/11/94, Page 4

shredding or destruction. He said that, on Thursday, February 10, 1994, SMITH RECYCLING picked up boxes, including ten to fifteen boxes which had been stored at the remote storage area and another eight to twelve boxes from JOYCE MCKENNA. He explained that MCKENNA had asked him to take eight to twelve boxes to the remote storage area which contained files which had been copied onto microfilm. He is unsure of what was in these boxes which were picked up by SMITH RECYCLING on Thursday. He seemed to recall that the boxes had two or three different names on them, one of them possibly having been related to a case involving TCBY. He said that SMITH RECYCLING is based in Pine Bluff, Arkansas. He said there is no one contact person there to arrange for shredding to be picked up. He normally calls the secretary at this company and tells them that they need a pickup. He seemed to recall that the last one had been made two to three weeks prior to the one on Thursday.

Mr. BOUCHER stated that he has never shredded or disposed of material or documents which were unusual or out of the ordinary. He stated that he had never seen any documents being destroyed which had the names FOSTER, WHITEWATER, MADISON GUARANTY SAVINGS AND LOAN, President or Mrs. CLINTON, VINCENT or LISA FOSTER, DAVID HALE, or JIM GUY TUCKER on them. He said that he never saw anything with FOSTER's name on it at the remote storage area nor with any of the other above-mentioned names. He had been told two to three weeks ago by RON CLARK and KATHY HARRIS that any boxes with FOSTER's name on them were to be taken to a special room. At that time, there were ten to twelve boxes related to FOSTER which were ready to be taken to the remote storage area, but CLARK told him not to take them to the remote storage area but to place them in the special room. He said he does not know where these boxes came from but added that they may have come from LORRAINE KLINE (phonetic) who used to be FOSTER's secretary.

BOUCHER stated that RIKI STACY has a list of items located in the remote storage area. About two to three weeks ago, BOUCHER brought boxes back from the remote storage area after KATHY HARRIS told him to do so. He did not know if the boxes had names on them or what names may have been on these boxes. He said normally RIKI STACY writes the name and location of each box that is kept in the remote storage area. She also notes the names of the person requesting certain boxes to be

29D-LR-35063

Continuation of FD-302 of ROBERT PAUL BOCHER, On 2/11/94, Page 5

brought from the storage area and the dates on which this request is made.

Mr. BOUCHER said that, on Thursday of last week (February 3, 1994), he left the office at 4:30 P.M. but does not recall if there may have been shredding in the bag in the shredding machine. He explained the machine is of the type that one cannot see the bag unless one opens the machine. He does not know if anyone shredded on that particular day. He stated that he did not know if anyone shredded after hours on that day and is not aware of any conversation that he or others may have had about shredding after hours at that time.

He stated he first became aware of the news article regarding the alleged destruction of files on Wednesday, the day that the article was published, when he saw photocopies of it on the couriers' table in the basement at ROSE LAW FIRM. He is uncertain of the exact time when he first saw the copies of this article. He stated he did hear mentioned on the radio on his way to work something about shredding being done at ROSE LAW FIRM and then saw the article. He stated that he never saw two people doing any shredding as was described in the article. He mentioned the contents of the articles to LARRY SMITH, the courier supervisor at ROSE LAW FIRM, who said he did not believe it happened. He stated that SMITH has only been there one or two months. He said, on the day that the article was published, there were numerous calls received from people with the news media. On Thursday, February 10, 1994, RON CLARK; JERRY JONES, another partner in ROSE LAW FIRM; KATHY HARRIS; and LARRY SMITH met, and, at that time, RON CLARK told everyone present about the fact that the FBI wished to speak to the couriers. He said that they should be totally honest about everything, and ROSE LAW FIRM had nothing to hide. He stated that no one at ROSE LAW FIRM had done anything wrong. He said that, on the afternoon of February 11, 1994, at 3:00 P.M., RON CLARK called a meeting which included BOUCHER, LARRY SMITH, KATHY HARRIS, and all of the couriers. RON CLARK told the group at this meeting that they were to be interviewed by the FBI, that they should not be nervous, but be totally honest. He said that the meeting lasted 15 to 20 minutes, and neither CLARK nor anyone there told them what they should or should not say during the FBI interviews. CLARK did state that, if they wanted a lawyer to be present during the interviews, they would be offered a lawyer. CLARK did state that any questions which would involve the attorney/client

29D-LR-35063

Continuation of FD-302 of ROBERT PAUL BOCHER, On 2/11/94, Page 6

privileged relationship should not be answered. He asked them to talk to him about such questions first, and he would check them out.

BOUCHER said that one or two of the couriers were apparently called at home by members of the press. He said that there had been a meeting on either Monday, Tuesday, or Wednesday at which time RON CLARK told everyone that the press would be calling and that it would be up to each individual whether or not they wanted to speak to the press. CLARK suggested that they not talk to the press. He said this meeting actually was composed of two meetings which included all of the staff but not the lawyers of the firm. The two meetings were held during the morning at 10:30 and then again at 11:00. BOUCHER did not know what the lawyers were told as far as speaking to the press. BOUCHER stated he did not know anything about the topic discussed in the "Washington Times" article before seeing the actual article. He stated that he has not discussed the subject matter in the article with anyone. He said that he never saw any lawyers doing any shredding.

BOUCHER stated that, just before coming to the interview with the FBI, he remembers one courier saying that there were two boxes which had been shredded. BOUCHER did not know the date on which these two boxes had been shredded. He thinks it may have been the courier named MARK who brought up the subject of the two boxes being shredded during the Friday 3:00 P.M. meeting. He stated that the courier, MARK, told this to RON CLARK, and RON CLARK said to go ahead and tell the FBI about it.

BOUCHER stated that he has no knowledge of the computers in the building. He said everyone has a computer except for himself. He stated that they were apparently networked together. He said that the data processing supervisor is a person named KIM KNACAS (phonetic), and a DONNA COLLINS is the problem solver for the data processing system.

He said that, when the subject of WHITEWATER first came up, RON CLARK called a meeting, and, at that time, he told everyone that no one had done anything wrong, and the ROSE LAW FIRM was innocent. During that meeting, CLARK told everyone that anything related to FOSTER was not to be thrown out. He said that this was the first time that they were told not to throw

29D-LR-35063

Continuation of FD-302 of ROBERT PAUL BOCHER, On 2/11/94, Page 7

anything out related to FOSTER. He said this meeting occurred about two weeks ago. He explained some secretaries put the lawyer's name on the outside of the box but usually not the client's name. He said that the boxes related to FOSTER were being kept in a special room located on the first floor. He said there were about 20 to 30 boxes in this room. He said, in order to take boxes and put them in the room, he had to go to KATHY HARRIS and tell her that he had boxes to put in that room. The last time when he took boxes into that room was on Monday or Tuesday of this week. He said there were two or three boxes regarding FOSTER. He remembered about two or three weeks ago being told by KATHY HARRIS to put a different lock on the door to this particular room. The only people that he remembers seeing in this room besides himself were RON CLARK, PHIL CARROLL, who is an attorney, and GARY SPEED, another attorney with ROSE LAW FIRM. He believes that GARY SPEED had some boxes of files which he had stored in that room previously and was in the room only to take those files out before it was being used to store FOSTER-related files.

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

FOIA(b)(7) - (C)

Date of transcription

2/13/94

CLIFTON TRYNAE WHITE, date of birth [redacted] black male, was advised of the identities of the interviewers, Special Counsel JULIE O'SULLIVAN and Special Agent (SA) [redacted] of the Federal Bureau of Investigation (FBI) and the purpose of the interview. WHITE was informed that the interview concerned incidents of shredding documents related to the current Whitewater investigation. WHITE was interviewed in the presence of his attorney, GREGORY KITTERMAN. WHITE furnished the following information:

WHITE stated he works in Purchasing and Receiving, handles the mail on occasion, and performs some of the couriers' responsibilities. WHITE said that he reports to LARRY SMITH from whom he takes orders directly. WHITE also acknowledged that he receives orders from other administrative personnel including attorneys, secretaries, and CATHY HARRIS, LARRY SMITH's boss. WHITE said that he began employment at the ROSE LAW FIRM during the middle of December 1993. WHITE said he is still employed by the City of Little Rock as the receptionist at the WAR MEMORIAL FITNESS CENTER (Friday evenings). WHITE said he works at the ROSE LAW FIRM from 7:00 a.m. to 3:30 p.m. or 4:00 p.m. five days a week. WHITE advised that he is currently attending the University of Arkansas at Little Rock (UALR).

WHITE confirmed that he has on occasion shredded documents, usually when he filled in for the couriers.

WHITE explained that each person would be assigned a floor and go around to the offices to pick up documents to be shredded. WHITE stated that this activity was done on Tuesdays and Thursdays at no particular time during the day. WHITE went on to mention that approximately one month ago, shredding was done on an as-needed basis; employees would call to have documents shredded. WHITE said that he usually receives a box full of paper off a single floor. WHITE claimed that he never reads the material given to him to be shredded nor was he ever given a whole box of documents to be shredded.

Investigation on 2/12/94 at Little Rock, Arkansas File # 29D-LR-35063 *Sub 11-1*

by SA [redacted] Date dictated 2/12/94



29D-LR-35063

Continuation of FD-302 of CLIFTON TRYNAE WHITE, On 2/12/94, Page 2

WHITE said that he did not do any shredding one week ago Thursday. WHITE acknowledged that he was not asked to do shredding that day either. WHITE said that every courier was at work that day except JEREMY. WHITE assumed the couriers did shredding that day.

WHITE said that he does not recall staying late that Thursday or during the last two weeks. WHITE advised that he leaves work around 3:00 or 4:00 p.m. WHITE said that he leaves the firm first and the couriers are always still there.

WHITE stated that there is only one shredder at the ROSE LAW FIRM located in BOB BOUCHER's office. WHITE did not know who has the keys to BOUCHER's office but said that the door to his office is usually left open. WHITE was unaware if BOUCHER's office door is closed in the evening.

WHITE again confirmed that he did not do any shredding of documents that Thursday.

WHITE was asked about the Washington Times article alleging that an employee of the ROSE LAW FIRM shredded Whitewater documents. WHITE opined that the story in the newspaper had no credibility as far as he was concerned. WHITE did not talk to any employee about the alleged shredding nor did he hear talk about shredding of Whitewater documents.

WHITE did not recall anything unusual occurring at the firm on Friday. WHITE said that he did not do any shredding on Friday. WHITE said that he has not done any shredding since last Tuesday.

WHITE was asked if he has ever read documents related to the following persons/entities: Whitewater, VINCE FOSTER, BILL and HILLARY CLINTON, MADISON, JIM GUY TUCKER, and DAVID HALE. WHITE claimed that he has not read documents related to those persons/entities.

WHITE again confirmed that he has never received a box of documents to shred.

WHITE said that no one has ever mentioned in any meeting the shredding of Whitewater or VINCE FOSTER related documents.

29D-LR-35063

Continuation of FD-302 of CLIFTON TRYNAE WHITE, On 2/12/94, Page 3

On Wednesday around 7:30 a.m. to 7:45 a.m., WHITE learned of the Washington Times articles from the E-Mail on LARRY SMITH's computer terminal. WHITE said that RON CLARK posted a message on the E-Mail system regarding the article.

WHITE recalled a meeting of staff and secretaries (no attorneys) with CATHY HARRIS and RON CLARK occurring a couple of weeks or more prior to the Wednesday he observed the E-Mail message. WHITE said this meeting was called to allow employees to air their grievances and complaints. WHITE learned of this meeting through a memorandum. This meeting lasted approximately 15 minutes. WHITE mentioned that he heard the words "subpoena" and "served" and that documents were being gathered. WHITE said he was not aware if FISKE was appointed at that time.

WHITE was asked whether any couriers expressed concern about shredding documents related to Whitewater or VINCE FOSTER.

WHITE said that he first read the actual Washington Times article when he observed a Xerox copy of the article at the couriers' station. WHITE thought the article was fantasy. WHITE read the article out loud in the presence of LARRY SMITH and JEREMY HEDGES. WHITE commented that the article did not seem right. WHITE claimed that the couriers are light-hearted people and that the "scared to death" part did not sound like them. WHITE did not think a lawyer talked with the reporter. WHITE believed the article's story was fabricated.

WHITE recalled a later meeting last Wednesday lasting five to ten minutes. WHITE said that the following firm employees were present: RON CLARK, BOB BOUCHER, LARRY SMITH, JEREMY HEDGES, CATHY HARRIS, MARK MC MAHON, and CLIFTON WHITE. WHITE said that CLARK spoke to the group and said that he had faith that no one had acted improperly. WHITE initially said that basically CLARK did not want people to talk to the press but then rescinded that statement. WHITE clarified CLARK's statement by stating that CLARK said people could talk to the press but to be aware that the press can switch around what they say. CLARK said that any press inquiries can be directed to himself. WHITE was asked if the FBI or Special Counsel was mentioned by CLARK. WHITE confirmed that CLARK did not mention these organizations in the meeting. According to WHITE, CLARK told everyone that, if they had information concerning shredding, they could come to CLARK with the information.

29D-LR-35063

Continuation of FD-302 of CLIFTON TRYNAE WHITE, On 2/12/94, Page 4

WHITE said that he did not go to work Thursday. KIRK, a fellow employee, called WHITE at home requesting LARRY SMITH's telephone number. KIRK needed to call SMITH to let him know that he would not be at work. WHITE claimed that KIRK talked to him about the Arkansas-Kentucky game. WHITE said that he also called LARRY SMITH and informed SMITH that he was iced in. WHITE said he did not go to work Thursday. WHITE confirmed that he did not talk to KIRK about the newspaper article.

WHITE said that he learned of the meeting with the FBI at 10:00 a.m. on Friday from Mr. SMITH. WHITE noted that he came to work at 1:00 p.m. on Friday after he called LARRY SMITH earlier to advise him that he would be to work after the ice melted. At 2:00 p.m. on Friday, RON CLARK told WHITE that the FBI meeting had been canceled. CLARK suggested that WHITE tell the truth to the FBI and Special Counsel. According to WHITE, RON CLARK said that no one gave the authority to shred Whitewater documents and that they had no knowledge of shredding documents of concern.

WHITE stated that he does not have anything to do with SMITH RECYCLING or the law firm's computer system (deleting files).

WHITE said that he did not talk with the Washington Times.

WHITE mentioned that CLAYTON was contacted by a reporter. JEREMY HEDGES told a reporter, "No comment," and asked the reporter how he got his name.

WHITE was unaware of any increase in shredding activities at the firm. WHITE claimed to be unaware of the firm's deposition of large boxes of documents. WHITE was unsure whether CLARK mentioned that counsel would be provided to those meeting with the FBI/Special Counsel.

[REDACTED]

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

29D-LR-35063

Continuation of FD-302 of CLIFTON TRYNAE WHITE, On 2/12/94, Page 5

WHITE provided the following pedigree information:

|                  |   |
|------------------|---|
| Name             | CLIFTON TRYNAE WHITE  |
| Home Address     | 1812 Reservoir Road, #276,<br>Little Rock, Arkansas             |
| Business Address | ROSE LAW FIRM,<br>120 East 4th Street,<br>Little Rock, Arkansas |
| Date of Birth    | <input type="text"/> - - - - - <input type="text"/> FOIA(b)(6)  |

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

FOIA(b)(6)

Date of transcription 2/14/94

JEREMY CHAD HEDGES, white male, date of birth [redacted]  
 [redacted] Social Security Account Number (SSAN) [redacted]  
 1701 West Park Drive, Apartment 44, Little Rock, Arkansas,  
 telephone number (501) 666-9222, parents' address 1003 South  
 Dogwood Drive, Siloam Springs, Arkansas, was interviewed at the  
 Little Rock Office of the Federal Bureau of Investigation (FBI)  
 by PAT SMITH, Office of the Independent Counsel, and Special  
 Agent (SA) [redacted] of the FBI. Present during the  
 interview was DEAN OVERSTREET, counsel for HEDGES. After being  
 advised of the identity of the interviewers and of the nature of  
 the interview, HEDGES provided the following information:

*Handwritten initials: DT 2/14, GWN*

HEDGES advised that he was hired as a courier for the  
 ROSE LAW FIRM, Little Rock, Arkansas, by MARY RUSSELL in  
 February, 1992. He advised that, in his position, he delivers  
 packages to other law firms, files to various courthouses, and  
 picks up packages at various law firms. He advised that he works  
 part time, averaging 26 hours per week, and attends the  
 University of Arkansas at Little Rock (UALR) where he is a junior  
 majoring in Biology. HEDGES further advised that he is directly  
 supervised by LARRY SMITH who reports to KATHY HARRIS.

HEDGES stated that he receives his assignments for the  
 day by picking up file cards from his box that tell him where  
 documents to be shredded are located. He provided an explanation  
 of how the card works by saying that a card with "two old" on it  
 would mean that documents to be shredded were located on the  
 second floor of the old building. He further stated that  
 documents to be shredded are picked up by the couriers on  
 Tuesdays and Thursdays.

HEDGES advised that it is standard procedure to pick up  
 documents to be shredded and take them to the office of BOB  
 BOUCHER in the basement where the shredder is located. He  
 advised that this shredder is the only one in the building to his  
 knowledge.

Investigation on 2/12/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 2/12/94

*Sub 11-6*

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| FBI - LITTLE ROCK |         |

*[Handwritten signature]*

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29D-LR-35063

Continuation of FD-302 of JEREMY CHAD HEDGES, On 2/12/94, Page 2

HEDGES stated that, last Wednesday, February 9, 1994, BOUCHER told him that a recycling company had picked up numerous boxes of records to be shredded that had been generated from litigation involving TCBY. He stated that he interpreted this to mean that the boxes had been picked up on Thursday, February 3, 1994. He further stated that BOUCHER told him that these records had nothing to do with the CLINTONS, WHITEWATER DEVELOPMENT, VINCENT FOSTER, MADISON GUARANTY SAVINGS AND LOAN, DAVID L. HALE or JIM GUY TUCKER. HEDGES further stated that he has never sent out documents to a recycling firm.

HEDGES advised that he personally shredded files of HILLARY CLINTON once prior to the Presidential election and once in February, 1993. HEDGES could not recall who ordered the shredding but advised that various secretaries would usually call a courier and tell them to pick up documents for shredding. HEDGES speculated that the HILLARY CLINTON files may have been shredded because they had been put on microfilm. He further advised that he knew the shredded documents were HILLARY CLINTON's because they had the initials "HC" on them, and tabs of files had her full name on them. HEDGES further advised that, to his knowledge, no documents regarding WHITEWATER DEVELOPMENT CORPORATION, MADISON GUARANTY SAVINGS AND LOAN, DAVID L. HALE, or JIM GUY TUCKER were among the HILLARY CLINTON documents that were shredded.

HEDGES stated that it is standard practice at the ROSE LAW FIRM to reuse boxes containing documents to be shredded. He stated that the name on the side of the box was usually crossed through with a marker. He stated that, approximately three weeks ago, he participated in the shredding of documents with VINCENT FOSTER's name on them. HEDGES stated that he knows they were FOSTER's because they had his initials on them, had file tabs with his full name, and several cover letters were signed by him. He stated that ELISE MC SHAEN (phonetic) brought down the documents of FOSTER's to be shredded. He further stated that MC SHAEN primarily works on the second floor of the new building and reports to KATHY HARRIS. HEDGES further stated that a couple of other couriers knew FOSTER's files had been shredded. HEDGES identified CURT FRIEBERG and CLAYTON LINDSEY as couriers who knew this, and LINDSEY shredded one-half of the box of FOSTER's documents. HEDGES further stated that FRIEBERG told him that he saw the FOSTER documents in a box in a discussion they had on February 11, 1994.

29D-LR-35063

Continuation of FD-302 of JEREMY CHAD HEDGES, On 2/12/94, Page 3

HEDGES advised that he learned on February 9, 1994, that VINCENT FOSTER's files had been taken to a room next to RONALD CLARK's, the managing partner's, office. He advised that he had learned that the firm was holding FOSTER's files approximately one and one-half weeks ago. He advised that CLARK told him that the file boxes concerning FOSTER were in the room next to his office. HEDGES further advised that, for three to four months, he saw several boxes with FOSTER's name on the outside stacked near an entrance to the firm located off an alley next to the parking lot. He further advised that, if he saw the boxes again, he would probably recognize them.

HEDGES stated that a meeting occurred on Tuesday at 9:30 A.M. during the last week of January that he was told to attend, but he was unable to due to school obligations. He stated that SMITH told him that the meeting concerned the press trying to talk to employees of the ROSE FIRM, and they were not supposed to comment on anything to the press. HEDGES stated that he does not know why the meeting was called but assumed it had something to do with the investigation of WHITEWATER DEVELOPMENT CORPORATION.

HEDGES advised that no one has instructed him not to shred documents regarding WHITEWATER DEVELOPMENT, the CLINTONS, DAVID HALE, JIM GUY TUCKER, MADISON GUARANTY SAVINGS AND LOAN, or JIM MC DOUGAL. He advised that a meeting was called on Wednesday, February 9, 1994, at 10:30 A.M. and included the couriers, BOUCHER, and CLARK. He further advised that CLARK told them that an article appearing in the "Washington Times" was false, and, to his knowledge, no shredding had occurred at the firm and, if any of them knew of shredding that had occurred, to tell him or leave an anonymous note.

HEDGES stated that he has never seen any documents at the ROSE LAW FIRM regarding WHITEWATER DEVELOPMENT, MADISON GUARANTY SAVINGS AND LOAN, or JIM MC DOUGAL. He stated that, during the meeting on February 9, 1994, CLARK did not ask if any couriers had shredded documents, and, therefore, he did not tell him about shredding FOSTER's documents approximately three weeks ago.

HEDGES advised that, on February 11, 1994, at 2:00 P.M. a meeting occurred between the couriers, BOUCHER, CLARK, HARRIS, and JERRY JONES, an attorney at the firm. He advised that CLARK

29D-LR-35063

Continuation of FD-302 of JEREMY CHAD HEDGES, On 2/12/94, Page 4

told them about pending interviews with the FBI, and they should tell the investigators anything they knew about shredded documents, and they should not worry about hurting the firm.

HEDGES stated that he felt like he needed an attorney because of his knowledge of the FOSTER document shredding that had occurred three weeks ago. He stated that, in the meeting of February 11, 1994, JONES asked him if he knew for a fact that documents shredded had been FOSTER's, and JONES told him to not assume the documents were concerning WHITEWATER DEVELOPMENT unless he had actually seen that.

HEDGES advised that he does not know what the FOSTER documents that he shredded pertained to. He advised that he decided on the night of February 11, 1994, that he wanted an attorney to accompany him to instant interview. He advised that he came to this conclusion after talking with his parents and HARRY JANSEN, JR., a fraternity brother at Sigma Nu, who told him to never meet with the FBI without an attorney. HEDGES further advised that he contacted LINDSEY, and they decided on OVERSTREET, who was referred by LINDSEY's aunt.

HEDGES stated that he did not work on February 3, 1994, as he was at school that day. He stated that he does not know if any shredding occurred on that day at the firm. He further stated that his only knowledge of shredded documents were the ones previously mentioned regarding the TCBY litigation.

HEDGES advised that he had a discussion with LINDSEY last weekend regarding LINDSEY being contacted by a "Washington Times" reporter on Friday, February 4, 1994. He further advised that he was contacted by a "Washington Times" reporter on Sunday, February 6, 1994, but he told the reporter he had no comment.

HEDGES stated that, on the morning of the article appearing in the "Washington Times," all of the couriers were wondering who had spoken to the reporter, but no names were ever decided upon as to who may have spoken with the reporter.

HEDGES advised that two associate attorneys, SAMMY STRANGE and another attorney, name unrecalled, have recently been asked to leave the firm and were given a two-week period to seek other employment. He advised that he and FRIEBERG had wondered if the two attorneys may have spoken to the "Washington Times."



29D-LR-35063

Continuation of FD-302 of JEREMY CHAD HEDGES, On 2/12/94, Page 5

HEDGES further advised that he has seen both attorneys that have been let go as recently as last Wednesday.

HEDGES stated that, to his knowledge, no records, with the exception of the records previously mentioned as being shredded, concerning President and Mrs. CLINTON, VINCENT and LISA FOSTER, WHITEWATER DEVELOPMENT CORPORATION, DAVID L. HALE, or MADISON GUARANTY SAVINGS AND LOAN have ever been destroyed at the ROSE LAW FIRM. He stated that he has seen JIM GUY TUCKER's name on files that were destroyed sometime in the summer of 1993, but he does not know what those files pertained to. HEDGES stated that he has no access to the computer nor does he have any knowledge of files deleted from the computer system.

HEDGES advised it is his understanding that the firm will pay for his attorney as he was told this by CLARK, the managing partner. OVERSTREET, HEDGES' attorney, stated that he has no written agreement with the ROSE LAW FIRM, but it is also his understanding that they will be paying for his services based on what HEDGES has told him.

HEDGES stated that he got his job at the ROSE LAW FIRM after BRUCE ANIBLE (phonetic), a fraternity brother, told him that he was leaving the firm, and he should look into applying for a job there. He stated that he was working for another law firm prior to that and called RUSSELL to set up an interview. HEDGES further stated that he was hired right away, and he has no other connections to the ROSE LAW FIRM.

HEDGES advised that he had nothing to change regarding information given to the interviewers during the course of the interview.

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

FOIA(b)(6)

Date of transcription

2/13/94

JASON BRENT LEMLEY (white male born [redacted] was interviewed at the Little Rock Headquarters of the Federal Bureau of Investigation (FBI) by Associate Independent Counsel DENIS J. McINERNEY and Special Agent [redacted]. He was advised that this interview concerned the alleged shredding of "Whitewater" documents at the ROSE LAW FIRM, Little Rock, Arkansas.

Present during this interview was LEMLEY's attorney, JOHN S. KITTERMAN, business address and telephone number 1101 Garland, Little Rock, Arkansas 72201, telephone number (501) 375-8840.

LEMLEY advised he presently resides at 6900 Cantrell Road, Apartment E-3, Little Rock, Arkansas 72207, telephone number (501) 661-9252. He stated he is a student (junior year) at the University of Arkansas at Little Rock (UALR) majoring in nursing. He stated he is a member of the Sigma Nu fraternity at UALR.

LEMLEY advised he is presently employed as a courier by the ROSE LAW FIRM and has been so employed since August 1993. He advised he works Monday through Friday from 2:00 p.m. until about 5:30-6:00 p.m. He advised that, prior to this job, he worked in a similar capacity during the summer of 1993 with the WRIGHT, LINDSEY, and JENNINGS LAW FIRM. He stated that, prior to that, he was a full-time student.

LEMLEY advised his duties as a courier generally involve such things as moving boxes, making deliveries and pickups at the courthouse and other offices, and shredding. He stated that couriers usually receive their instructions from LARRY SMITH or KATHY HARRIS of the ROSE LAW FIRM. He advised that, when he first started at the firm, his supervisor was MARY

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Investigation on 2/12/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 2/13/94

29D-LR-35063

Continuation of FD-302 of JASON BRENT LEMLEY . On 2/12/94 . Page 2

(LNU) who resigned shortly after his arrival. He stated that shredding is done on Tuesdays and Thursdays, and the shredder is maintained in the office (maintenance room) of BOB BOUCHER. He stated this room is usually unlocked during the day, but is locked at 4:30 p.m. until 7:00 a.m. the next morning.

LEMLEY advised he has never seen any shredding other than on Tuesdays and Thursdays, and he has never seen anything shredded after 4:30 p.m. on those days. He advised that there has not been any increase in shredding over the past few months.

LEMLEY advised that CLAYTON LINDSEY and JEREMY HEDGES are also couriers at the firm as well as Sigma Nu fraternity brothers of his. He advised that on Sunday night, February 6, 1994, while taking LINDSEY and MATT POWELL home after their fraternity chapter meeting, LINDSEY told him about being contacted by the "Washington Times." He stated he cannot recall what else was said about this at that time.

LEMLEY advised that a day or two before the "Washington Times" story came out, probably on Monday, February 7, 1994, or Tuesday, February 8, 1994, he was having a conversation with several other couriers, probably LINDSEY, HEDGES, and CURT FRIEBERG, and someone said that some boxes had been shredded several weeks ago. LEMLEY stated that LINDSEY seemed worried about how the "Washington Times" got his name and "number." He stated that nobody seemed to know what the boxes contained. LEMLEY advised LINDSEY said this had been the first time he (LINDSEY) had been contacted by reporters.

LEMLEY advised that, on the day the article was printed, HEDGES told him that he (HEDGES) had gotten several telephone calls from the "Washington Times." He advised HEDGES told him that the person described in the article as "not talking" was probably LINDSEY. He stated that he had asked LINDSEY who the others mentioned in the article might be, but LINDSEY did not know.

29D-LR-35063

Continuation of FD-302 of JASON BRENT LEMLEY, On 2/12/94, Page 3

LEMLEY advised he has had no further conversations with any of the couriers concerning this story. He stated he has no idea whom the people mentioned in the story might be. He stated they are all friends, but "not really good friends." He said he has known HEDGES as a fraternity brother since the fall of 1992, and does not believe him to be the type of person who would have contacted reporters.

LEMLEY advised that two or three weeks ago LINDSEY and HEDGES shredded a box that had the initials "VF" on it. He stated the box was already in the maintenance room, and he believes it was LARRY SMITH who told LINDSEY and HEDGES to do it. He stated that he does not know who brought it to the room. He advised that LINDSEY and HEDGES described it as a "Xerox paper" size box packed full of files and papers. He stated that LINDSEY and HEDGES did not look at the papers before shredding them. He said that he believes there was only this one box at that time.

LEMLEY advised he has never seen any of the firm's attorneys shredding documents. He stated couriers are the ones who usually do the shredding. He stated they never shred on other than normal days, and they never ship documents outside the office to be shredded. LEMLEY advised the firm has a remote storage facility on Cantrell Road, but there is no shredding done there. He advised that the firm has only one shredding machine.

LEMLEY advised he has never shredded any files which he knows to have been associated with any of the following:

VINCENT FOSTER  
 BILL CLINTON  
 HILLARY CLINTON  
 WHITEWATER DEVELOPMENT  
 MADISON GUARANTY SAVINGS AND LOAN  
 JIM GUY TUCKER  
 DAVID HALE

LEMLEY advised that yesterday (February 11, 1994) about 3:30 p.m., there was a meeting with the couriers at the firm. Present with the couriers were HARRIS, JERRY JONES, and Mr. CLARK. He stated the couriers were told to come to the FBI office on Saturday and to answer all questions truthfully. He

29D-LR-35063

Continuation of FD-302 of JASON BRENT LEMLEY, On 2/12/94, Page 4

stated that they were told they could have attorneys with them if they wanted. He advised he thinks Mr. CLARK told them that the "Washington Times" story was wrong.

LEMLEY advised that, during this meeting, HEDGES told Mr. CLARK about the "VF" box being shredded. He (CLARK) did not seem to know about it. He (CLARK) did not seem particularly concerned. LEMLEY advised that Mr. CLARK did not ask who wanted this particular box shredded. He advised they were not asked if one of them was the person described in the article as having done the shredding. LEMLEY stated they were not told they could not talk to the press. He stated he has no desire to talk to a reporter. LEMLEY stated the only talk among the couriers regarding the newspaper article is their curiosity about whom the article refers.

LEMLEY advised that now that he is fully aware of the Government's interest in this matter, he will report any destruction of files which he believes might be of interest to the Independent Counsel..

LEMLEY provided the following information:

|        |                    |
|--------|--------------------|
| Name   | JASON BRENT LEMLEY |
| Race   | White              |
| Sex    | Male               |
| DOB    |                    |
| POB    |                    |
| SSAN   |                    |
| Height | 6'2"               |
| Weight | 207 pounds         |
| Hair   | Black              |
| Eyes   | Brown              |

FOIA(b)(6)

At the conclusion of this interview, LEMLEY was served with a subpoena to appear before the Federal Grand Jury, Little Rock, on February 16, 1994, at 10:00 a.m.

- 1 -

## FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription 2/14/94

On February 12, 1994, CLAYTON ARTHUR LINDSEY was interviewed at the Little Rock Office of the Federal Bureau of Investigation (FBI) by Special Agent (SA) [redacted] FBI, Little Rock Division, and PATRICK J. SMITH, Associate Counsel, Office of the Independent Counsel. Present with LINDSEY was his attorney, WILLIAM DEAN OVERSTREET, of DOVER AND DIXON, 425 West Capitol, Suite 3700, Little Rock, Arkansas 72201, telephone number (501) 375-9151. OVERSTREET was present during the entirety of the interview. After being advised of the identities of the interviewers and of the nature of the interview, LINDSEY provided the following information:

LINDSEY stated that he is a sophomore enrolled at the University of Arkansas, Little Rock, and only works at ROSE LAW FIRM part time. He advised that he normally works 30 to 35 hours per week, and his work hours are generally from 12:30 P.M. until 6:00 P.M. during week days. LINDSEY advised that his position is that of a courier, and KATHY HARRIS is the overall supervisor and office manager. LINDSEY stated that he has worked at the ROSE LAW FIRM since February, 1993.

According to LINDSEY, the couriers have one large area in the basement of the ROSE LAW FIRM which is accessed by taking the stairwell to the basement. He stated that the area is an open area with no door, and the couriers sit in the area at a table awaiting work assignments. He further advised that LARRY SMITH fills out the assignment cards which are dropped into a box, which each of the couriers, upon returning from an assignment, review for additional work assignments. Next to the area utilized by the couriers is an office occupied by BOB BOUCHER. BOUCHER's office has a door that is locked when he is off duty, and the only paper shredder that LINDSEY is aware of at the ROSE LAW FIRM is in that office. According to LINDSEY, BOUCHER has a key to the office, and the office manager additionally has a master key and can access the office when shredding needs to be done after BOUCHER has left.

Investigation on 2/12/94 at Little Rock, Arkansas File # 29D-LR-35063 *sub 11-4*

by SA [redacted] Date dictated 2/12/94

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FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 70

(1087)

29D-LR-35063

Continuation of FD-302 of CLAYTON ARTHUR LINDSEY, On 2/12/94, Page 2

In describing the work done by the couriers for the ROSE LAW FIRM, LINDSEY said that he and the other couriers make runs when a secretary or attorney bring materials, along with a courier slip, for delivery to various offices in town and when documents need to be delivered to the clerks of the various courts in Little Rock. There is also a main run for the courts in town twice a day, and one of the couriers will be assigned to make those runs. LARRY SMITH is in charge of making the assignments. Additionally, the couriers make mail runs around the office and pick up trash from the offices in the ROSE LAW FIRM for shredding. LINDSEY stated that the attorneys and secretaries working with documents all have two trash cans, one for regular trash and one for trash to be shredded. The couriers retrieve the trash to be shredded and take it to BOUCHER's office to shred those papers. LINDSEY said that six or seven assignment cards will be filled out and placed in the assignment box for the couriers to pick up, and each of the cards will have an area of assignment for picking up the trash to be shredded in a given area of the office. LINDSEY gave an example of what might appear on one of the assignment cards for shredding as "Pick up shredding three old." This would mean to pick up the trash to be shredded from the third floor of the older portion of the building. LINDSEY advised that the couriers will take with them a box and empty the trash to be shredded into the box, and then take those materials to the shredder in BOB BOUCHER's office. He stated that BOUCHER is normally not in the room while the shredding is going on, and, if someone else is already using the shredder, the courier will simply set his box of materials to be shredded on the table and wait his turn.

After BOUCHER leaves at approximately 4:30 P.M. in the afternoon, his door is locked, and, if there is additional shredding, the couriers then attempt to get a key from KATHY HARRIS, or she will open the door for them. LINDSEY stated that he had shredded documents after 4:30 P.M., but he cannot remember when he last did so. He further stated that he had not shredded any documents after 4:30 P.M. within the last two weeks.

Additionally, he advised that the normal types of materials to be shredded are letters to other attorneys, clients, and old court files, all of which are normally loose papers. When questioned as to whether he had ever read any of the documents, LINDSEY stated that he had not read them to the extent that he knew what was in them, but they were letterhead documents

29D-LR-35063

Continuation of FD-302 of CLAYTON ARTHUR LINDSEY, On 2/12/94, Page 3

and so on. LINDSEY was then questioned as to whether he had ever destroyed files or documents or recalled hearing anything regarding destruction of documents regarding President or Mrs. CLINTON, VINCENT or LISA FOSTER, WHITEWATER DEVELOPMENT CORPORATION, MADISON GUARANTY SAVINGS AND LOAN ASSOCIATION, DAVID L. HALE, or JIM GUY TUCKER. LINDSEY replied that he did not recall nor did he have any knowledge of ever destroying any documents related to any of the persons or entities about which he was questioned with the exception of documents related to VINCENT FOSTER. He stated that he had assisted in shredding a box containing files belonging to VINCENT FOSTER, but he could not recall the exact date, but it had been approximately three weeks before the interview date. As he recalled the event, JEREMY HEDGES had received the box which LINDSEY described as a white banker's box which contained files and documents, and HEDGES had shredded approximately one-half of the box and had advised him (LINDSEY) that he was tired. LINDSEY then took over the shredding for HEDGES and completed shredding the remaining items in the box. LINDSEY recalled that this shredding occurred in the afternoon, and he was aware that the box contained files belonging to FOSTER because he had observed "VWF Files" on the outside of the box. Additionally, HEDGES had also advised him that it was a box of files or documents belonging to FOSTER.

LINDSEY was then questioned as to whether or not the shredding of the contents of a box containing files was a normal occurrence. He replied that it is normal to shred the contents of a whole box when the files have been closed and/or when items in the box have been placed on microfilm for storage. He additionally related that the ROSE LAW FIRM sends out items in bulk for destruction, but he does not know how much is sent out in that fashion, but stated that BOB BOUCHER does know. Further, he advised that he does not know who takes care of the shredding or destruction outside of the firm.

When LINDSEY was questioned as to whether or not he was aware who brought the box of FOSTER materials to JEREMY HEDGES to be shredded, he recalled that HEDGES had said to him that ELISE MC SHAN (phonetic) gave it to him (HEDGES). He further related that he had learned that information the morning of the interview, and his attorney, OVERSTREET, had been present as well. He stated that he had had no other conversation with other persons regarding the recent shredding of the materials in the box belonging to VINCENT FOSTER. He further stated that he does



29D-LR-35063

Continuation of FD-302 of CLAYTON ARTHUR LINDSEY, On 2/12/94, Page 4

not know who else might have that knowledge and stated that he did not tell anyone else.

Regarding the contents shredded by HEDGES and himself, LINDSEY was questioned as to whether any materials from WHITEWATER DEVELOPMENT CORPORATION, MADISON GUARANTY SAVINGS AND LOAN, DAVID L. HALE, or JIM GUY TUCKER were in the box. LINDSEY stated that he knows the WHITEWATER CORPORATION name, but that he has never shredded any documents related to WHITEWATER to his knowledge and stated that he is not aware of any documents related to any of the other persons or entities having been in the box or that were shredded by himself and HEDGES. He stated that the shredding seemed routine to him.

LINDSEY was then asked whether or not he is familiar with the story published by the "Washington Times" on Wednesday, February 9, 1994. He stated that he is familiar with the story, and, when asked how he had become aware of it, LINDSEY advised that he had come to work and found a copy of the article sitting on the desk at the courier station. When asked with whom he had discussed the article, he replied that he had talked with people at work, that is "the guys at the courier station;" his mother, CAROLYN LINDSEY; and his girlfriend, SHEA SCRUGGS. He further denied any knowledge of who the persons are referred to in the "Washington Times" as having talked to the reporter.

LINDSEY did state that JERRY SEPER, author of the "Washington Times" story, had contacted him at his residence and had called twice. He stated that SEPER had left a message on the answering machine at his residence Friday, February 4, 1994, stating that he was calling for CLAYTON LINDSEY, and he was with the "Washington Times." SEPER left two numbers for LINDSEY to return his call, but LINDSEY did not return the calls. He stated that he told his girlfriend, SHEA SCRUGGS, and his mother, CAROLYN LINDSEY, and his mother advised him not to call back. He also told JEREMY HEDGES and BRENT LEMLEY, other couriers at work. He stated he believed that he told them either that Friday or Saturday about the call. SEPER then called again on Sunday, February 6, 1994. LINDSEY remembered having come home after being at the house of one of his girlfriend's friends. LINDSEY had been in the shower and had just gotten out sometime between 3:00 and 4:00 P.M. when the phone rang. After SEPER identified himself, LINDSEY told him that he did not have anything to say. SEPER then asked him about the shredding of WHITEWATER documents,

29D-LR-35063

Continuation of FD-302 of CLAYTON ARTHUR LINDSEY, On 2/12/94, Page 5

and LINDSEY claimed to have told SEPER that he did not know anything regarding the shredding of WHITEWATER documents and had no comment. LINDSEY further recalled that SEPER then said to him that he (SEPER) did not have to use LINDSEY's name but said that the Federal prosecutors will be down in Little Rock, and he (SEPER) was just trying to clear "your name." LINDSEY recalled that SEPER did not ask whether or not the shredding had occurred on a specific date. When asked whether any documents related to the WHITEWATER DEVELOPMENT CORPORATION or specific documents were shredded, he advised he had no comment. LINDSEY stated that the call lasted approximately three to four minutes, and he told his mother about it and related to her the extent of the conversation.

LINDSEY further related that he was aware that there had been an 8:00 A.M. meeting called at the ROSE LAW FIRM for all of the employees approximately two to three weeks before his interview at the FBI Office. LINDSEY stated that he had not been there because he had been in class, but LARRY SMITH had told him what had been said. LINDSEY recalled that he had been told that the employees were advised by RON CLARK, the managing partner, not to speak to the press. Additionally, at the meeting, CLARK announced that Attorneys JIM BIRCH and SARAH HOOD TEED were leaving the firm. LINDSEY stated that he does not know why that they left. When questioned whether or not such a meeting has occurred previously to his knowledge, LINDSEY stated that there had never been a meeting like that before, or even a whole staff meeting before, during the time in which he has been employed at ROSE LAW FIRM, and he is not aware of others before that time. He did say that KATHY HARRIS, the office manager, had tried to involve the couriers more with the happenings at the office.

LINDSEY was then asked whether he knew of other instances where documents were destroyed or had knowledge that documents had ever been destroyed relating to the CLINTONS, VINCENT or LISA FOSTER, the WHITEWATER DEVELOPMENT CORPORATION, the MADISON GUARANTY SAVINGS AND LOAN, DAVID HALE, or JIM GUY TUCKER. LINDSEY replied that he did not, with the exception that he recalled being told by JEREMY HEDGES that HILLARY CLINTON's documents had been destroyed earlier, approximately a year ago, before LINDSEY had become employed at the ROSE LAW FIRM. HEDGES had told him that he had shredded her files before. LINDSEY then stated that the only other destruction he was aware of was the

29D-LR-35063

Continuation of FD-302 of CLAYTON ARTHUR LINDSEY, On 2/12/94, Page 6

incident already reported regarding the box of VINCENT FOSTER papers which had occurred approximately three weeks earlier.

LINDSEY was then again questioned related to the telephone call received from JERRY SEPER on Sunday, February 6, 1994, and who else he might have talked to regarding the conversation. LINDSEY recalled that he did not work Monday, February 7, 1994, and that he had told JEREMY HEDGES and BRENT LEMLEY about the conversation and also a friend, JIMMY LYNCH, who does not work at the ROSE LAW FIRM. He also told his girlfriend, and then, after the article was published, he and JEREMY HEDGES; who had also received a call from the ASSOCIATED PRESS, went upstairs to tell RON CLARK about being called by the reporters. According to LINDSEY, HEDGES went with him because the ASSOCIATED PRESS people had called HEDGES at work. When they arrived at CLARK's office, his door was shut, and they then went to tell WILSON JONES, who LINDSEY stated he knows fairly well. JONES then instructed them to tell RON CLARK, and, when they entered CLARK's office, JERRY JONES was in the office as well, and he and HEDGES told the two of them. LINDSEY recalled telling them what had happened and that they, meaning CLARK and JONES, had said to them that they had done the right thing. Neither told CLARK and JONES at that time about having shredded the materials in the VINCENT FOSTER box but told them about it on Friday, February 11, at about 2:00 P.M. CLARK had wanted to know how they knew that the box contained VINCENT FOSTER files, and LINDSEY said that he had seen the name on the box and letterhead, and the signature had been seen by JEREMY HEDGES. This conversation transpired during a meeting of all of the couriers, along with BOB BOUCHER as they were talking about the interviews schedule at the FBI. LINDSEY recalled that CLARK told them to tell the truth but not to assume anything. He also recalled CLARK saying that they should not try to protect anyone, and that the firm would provide a lawyer or would pay for a lawyer if any of the couriers felt that they needed one. LINDSEY stated he had called his aunt, DONNA CLAYTON, who is an attorney, and she had told him that he should obtain an attorney.

LINDSEY was then asked whether or not he works with computer files and the destruction of computer files, and he responded that he had no idea how it is done. He also advised that he has no access to the computers except for the sending of messages within the office. He denied having any knowledge of any destruction of computer files. LINDSEY was then asked as to

29D-LR-35063

Continuation of FD-302 of CLAYTON ARTHUR LINDSEY, On 2/12/94, Page 7

what knowledge he had of others who also shred documents and trash to be shredded. He advised that BOB BOUCHER handles the bulk shipment for destruction, and he had heard that maybe the last shipment had gone out during the previous week. LINDSEY stated that this had just been general conversation. When asked whether he knows of any other shredders present in the office, he advised that he did not and had not been aware of there being additional shredders at other times. He was also asked whether or not he knew of any previous meetings similar to the one that occurred with the entire staff approximately two to three weeks ago, and he also responded in the negative. When asked whether he had any knowledge or had heard any rumors or gossip regarding the destruction of files or the newspaper article, he indicated that he had not.

He was further asked whether or not he had any specific recollection of documents from the VINCENT FOSTER box. He stated that he did not recall personally seeing FOSTER's signature, but he was not paying attention. When asked whether he had knowledge of whether or not there had been Federal Grand Jury subpoenas issued regarding documents at the ROSE LAW FIRM, LINDSEY responded that he had not. He further stated that, on February 11, 1994, he had heard there was to be no more shredding until the issue regarding shredding of documents had been resolved, but there had been no instructions given to him before regarding not shredding certain documents. He further stated that, also on February 11, 1994, he had heard that all FOSTER documents were being placed in a room next to RON CLARK's office, but he does not know who has access to the room and did not have knowledge of documents being placed in that room before.

LINDSEY provided the following information regarding himself:

|                |   |
|----------------|---|
| Name           | CLAYTON ARTHUR LINDSEY  |
| Race           | White   |
| Sex            | Male  |
| Date of Birth  |   |
| Place of Birth | <span style="border: 1px solid black; display: inline-block; width: 150px; height: 20px;"></span> -- [FOIA(b)(6)] |
| Height         | 6'1"  |
| Weight         | 180 pounds  |
| Hair           | Brown   |
| Eyes           | Hazel   |

29D-LR-35063

Continuation of FD-302 of CLAYTON ARTHUR LINDSEY, On 2/12/94, Page 8

Social Security  
Account Number (SSAN)

[Redacted]

FOIA(b)(6)

Residence Address

6515 R Street,  
Little Rock, Arkansas 72207

Home Telephone

(501) 661-1104

Employed

ROSE LAW FIRM

Work Telephone

(501) 375-9131

FOIA(b)(7) - (C)

FEDERAL BUREAU OF INVESTIGATION

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

Date of transcription 6/2/94

LORETTA M. LYNCH, Campaign Manager, DELAINE EASTIN COMMITTEE FOR CALIFORNIA SUPERINTENDENT OF PUBLIC INSTRUCTION, 311 California Street, Suite 510, San Francisco CA 94104, 414-837-5460, was contacted at the offices of LEGAL STRATEGIES GROUP, Watergate Towers, 2000 Powell Street, Suite 875, Emeryville CA 94608, 510-450-9600. Present was WILLIAM A. BROCKETT, LYNCH's legal counsel. Also, present were WILLIAM S. DUFFEY, JR. and RUSTY HARDIN, Office of the Independent Counsel, Little Rock, Arkansas, who identified themselves to LYNCH. LYNCH was advised of the identity of [redacted] Special Agent of the Federal Bureau of Investigation, [redacted]

LYNCH

provided the following information:

[redacted]

LYNCH started with the CLINTON Campaign on MARTIN LUTHER KING's birthday, January 20, 1992 or January 21, 1992. She came to do issues work responding to negative press stories. She was not hired to be a lawyer. She was hired to handle press issues. CHRISTINE VARNEY was hired as the campaign lawyer. LYNCH received her assignments from the Friends of Bill (FOB's), MICKEY KANTOR, JIM LYONS, KEVIN O'KEEFE, and others. Her assignment would be: "What's in the press, and how do we handle it." It changed with the WHITEWATER issue when they started getting calls from Arkansas, about February 8th through the 11th. SUSAN THOMASAS was mostly in charge of WHITEWATER, but LYNCH was the person on the ground. She would call THOMASAS and tell her about the issues. LYNCH kept THOMASAS apprised. Before the story hit, LYNCH communicated with THOMASAS, and THOMASAS communicated with HILLARY CLINTON.

29D-LR-35063 - sub 11-97

SEARCHED INDEXED SERIAL NR NR

JUL 21 1994

Investigation on 6/1/94 at Emeryville, California File # 29D-LR-35063

by SA [redacted] Date dictated 6/2/94

Copy to Sub 10, 11, 12, 24, OIC(2), SA's(3) 7/25/94 NR

29D-LR-35063

Continuation of FD-302 of LORETTA M. LYNCH, On 6/1/94, Page 2

The "Defense Team" changed at times. As of March 10, 1992, the "Defense Team" was DIANE BLAIR, ROGER MARTIN, SUSAN THOMASAS, and JIM LYONS. About March 20, 1992 or March 21, 1992, BETSEY WRIGHT joined.

LYNCH reviewed WHITEWATER documents at the ROSE LAW FIRM a couple of times before the GERTH article was published. To review them on these occasions, she went into the conference room where the documents were waiting for her. She dealt with BILL KENNEDY, WEBB HUBBELL, JIM LANCE, or CAROL HUBER. On the night of the GERTH story, she met HUBBELL in the parking lot of the ROSE LAW FIRM, and HUBBELL gave her the documents concerning WHITEWATER. She first looked at the documents just before the Colorado primary, sometime between February 8, 1992 and March 3, 1992. She recalled looking at the records two or three times. There were about three boxes of WHITEWATER records. There were a lot of documents that were not relevant to her purpose. Primarily, her goal was to figure the amount the CLINTON's put into WHITEWATER. She was not worried about deeds or correspondence. The night before the GERTH article appeared, she recruited quite a few campaign workers to look at the documents. After their review, the documents that were reviewed stayed in an office she shared with DIANE BLAIR and ROGER MARTIN. On the weekend of March 22, 1992, the documents were moved to a different building. MARTIN or MIKE COOK, a file clerk, took care of the documents until she gave them back to VINCE FOSTER or HUBBELL at the ROSE LAW FIRM.

LYNCH did not make a judgement as to whether the documents she had received before the article were sufficient to get a complete understanding of the amount that the CLINTON's contributed to WHITEWATER. She noted that she received more documents after the article. She talked with CHARLIE JAMES, CHRIS WADE, and JIM MCDUGAL about WHITEWATER, and she had someone go to Marion County Courthouse for records. She determined she needed to review the WHITEWATER investment.

She kept notes on her laptop computer, but she "actually" deleted her notes when she left. She left the CLINTON Campaign on June 14, 1992 or June 15, 1992 to become the Campaign Manager for DIANE FEINSTEIN. She did not keep a personal diary. She kept personal notes on the computer. She did not know if they still exist. She has not looked.

29D-LR-35063

Continuation of FD-302 of LORETTA M. LYNCH, On 6/1/94, Page 3

She called various banks, CHERRY VALLEY, PARAGOULD, FIRST OZARK, probably UNION NATIONAL, and STEVE SMITH's bank for various documents which they sent to her.

She was responsible for other issues that arose during the campaign: the draft, CLINTON's personal issues, bond and state business that went to the ROSE LAW FIRM. She answered reporters questions about all of these issues. They did not go many places to look at records. It was more of who wanted to give them documents. They did not go looking for documents. She often received documents from unknown sources. She spoke with CHARLIE JAMES, who was the MADISON GUARANTY accountant, and he was very helpful. He had a very thick southern Arkansas accent, and it was difficult understanding him. She talked with JIM MCDUGAL a couple of times. The first meeting she had with MCDUGAL was at SAM HEUER's office. JIM BLAIR was there to interpret Arkansas accents. He just helped out from time to time.

She had called BLAIR when she saw the commodities story in the press which mentioned his role in the trades. She had talked with BLAIR about what to do with her options trading. She called BLAIR to offer her general support. During the conversation, she mentioned that she saw his picture in the New York Times. She told him that it was a great photo.

She thought that GERTH's initial article was inaccurate, and she put together a response to show the inaccuracies. GERTH called her from time to time. She pretty much told him to go away. She did not particularly like GERTH and did not think he was interested in reporting things accurately.

The first meeting with MCDUGAL lasted less than an afternoon. BLAIR wrote a memorandum about the meeting. She did not know who called the meeting. The reason for the meeting was MCDUGAL had talked with the ARKANSAS DEMOCRAT GAZETTE and had said some unkind things. When asked if the purpose of the meeting was to tell MCDUGAL to shut up, she responded, "That's one way to characterize it." She did not recall MCDUGAL being told to shut up. She was just there to focus on Lot #13 and what happened with Lot #13. HEUER and MCDUGAL also talked about the law suit.



29D-LR-35063

Continuation of FD-302 of LORETTA M. LYNCH, On 6/1/94, Page 4

LYNCH was asked if she had seen the 1992 letter from BLAIR to HEUER referring to the Statute of Limitations and the question of whether it had run on certain claims that still could be asserted against MCDUGAL. She responded:

She had not seen it at the time, but she had heard about it. She did not consider SAM HEUER a friend of the party since he represented someone who had said bad things about the campaign. MCDUGAL was a very bright person. He was not crazy. She did not think that she met with BLAIR again. She might have talked with him on the phone. BLAIR knew everyone. He was there to raise the comfort level. MCDUGAL did most of the talking. She got the feeling that he was put out with HILLARY. There was a concern that he would speak with the press. She did not know if he was saying the truth. At the time that the story hit, the campaign thought that he was going around telling tales. She thought all of the stories were not true-- GENNIFER FLOWERS, COLONEL HOLMES, and all of the other stories. They were all slanted against the CLINTON's.

LYNCH was asked if anyone told MCDUGAL to get lost during the campaign, in light of the fact that during the campaign he moved to Texas. There was a long pause. Then she answered:

She did not know if anybody ever told MCDUGAL to get lost for awhile. She thought that R.D. (RANDOLPH) talked with MCDUGAL. If anyone told MCDUGAL to get lost, it would have been him. She knew that when MCDUGAL was out of touch with the press, she did not have to worry about a press story. MCDUGAL had always been described to her as crazy as a loon. At the meeting, she just thought he was on drugs. They chatted about his breakdown after the trial and the fact that he was on drugs.

She has not seen BLAIR in person since the inauguration. She has talked with him from time to time when she has been called by a reporter. She would call a variety of people, BLAIR being one of the people she would call. JIM and DIANE BLAIR were close friends of BILL and HILLARY CLINTON. They were in each other's weddings.

Before providing documents in compliance with the aforementioned subpoena, BROCKETT issued the caveat that he was in possession of additional documents that he had not yet

29D-LR-35063

Continuation of FD-302 of LORETTA M. LYNCH, On 6/1/94, Page 5

determined if they were covered under the subpoena. He then provided two sets of documents. One set was numbered from one to 237 (#129 - #131 were withdrawn) and described as documents from LYNCH's files. The other set of documents consisted of 63 pages which were described by BROCKETT as documents LYNCH received from a source that would not be identified, but then BROCKETT volunteered that they were provided by DAVID KENDALL to prepare for the interview.

INTERVIEW SUMMARY

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

Person interviewed: LORETTA M. LYNCH

Hostile (H): Yes X No   

General Topic:

Short summary of interview (use second page if needed):

LYNCH was not forthright with her responses. She answered in generalities with no substantive detail.

Should person be reinterviewed? Yes    No X

Leads from the interview: (includes evidentiary items to be obtained to corroborate interview, other persons to be interviewed, apparent violations identified)

None based on this interview.

Names mentioned by interviewee (company/individual):

CHRISTINE VARNEY  
JIM LYONS  
SUSAN THOMASAS  
DIANE BLAIR  
BETSEY WRIGHT  
WEBB HUBBELL  
CAROL HUBER  
VINCE FOSTER  
JIM MCDUGAL  
STEVE SMITH  
R.D. RANDOLPH  
BILL CLINTON

MICKEY KANTOR  
KEVIN O'KEEFE  
HILLARY CLINTON  
ROGER MARTIN  
BILL KENNEDY  
JIM LANCE  
MIKE COOK  
CHRIS WADE  
DIANE FEINSTEIN  
SAM HEUER  
DAVID KENDALL

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription 2/14/94

LARRY AL SMITH, black male, date of birth [redacted] Social Security Account Number (SSAN) [redacted] home address 2123 Labette Drive, Apartment X19, Little Rock, Arkansas 72205, home telephone number (501) 228-4736, was advised of the identity of the interviewing Agent and the purpose of the interview. Also present during the interview was SMITH's attorney, GREGORY KITTERMAN, business address 1101 Garland Street, Little Rock, Arkansas 72201, business telephone number (501) 374-1145, and Independent Counsel JULIE O'SULLIVAN. SMITH then provided the following information:

SMITH is employed by the ROSE LAW FIRM, business address 120 East Fourth Street, Little Rock, Arkansas 72201, business telephone number (501) 377-0364, as their supervisor of the supply area. SMITH has worked at the ROSE LAW FIRM for approximately six weeks and reports to KATHY HARRIS. A part of SMITH's duties is to supervise the couriers that work at ROSE LAW FIRM. SMITH identified the following individuals as being couriers at the ROSE LAW FIRM: CLIFTON WHITE, KURT FRIEBERG, CLAYTON LINDSEY, JEREMY HEDGES, BRENT LENLEY, and MARK MC MAHON. SMITH advised that, previous to coming to work at the ROSE LAW FIRM, he worked at WORTHEN BANK AND TRUST as their production coordinator for approximately three months. Prior to that, SMITH worked at the SCHOOL OF DEAF in their central supply department.

X  
DFM

SMITH advised that he did not participate in the shredding, destruction, or alteration of documents or computer files during his six weeks at the ROSE LAW FIRM. SMITH advised that the usual procedure for shredding of documents at the law firm was that, on Tuesdays and Thursdays, cards would be placed in certain boxes for the couriers to pick up and then to take downstairs into the office of BOB BOUCHER. In BOUCHER's office was one single shredding machine that was used for all of the shredding at ROSE LAW FIRM. SMITH described the cards that were placed in the boxes as being coded as to being either for the old building or the new building at ROSE LAW FIRM, and it also included the floor number. For example, the card would say "one

246-11-35063 sub 11-3

Investigation on 2/12/94 at Little Rock, Arkansas File # 29D-318-35063

by SA DAVID F. REIGN/bkw Date dictated 2/12/94

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|-------------------|---------|
| SEARCHED          | INDEXED |
| SERIALIZED        | FILED   |
| FEB 15 1994       |         |
| FBI - LITTLE ROCK |         |

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29D-LR-35063

Continuation of FD-302 of LARRY AL SMITH, On 2/12/94, Page 2

old" which would signify that on the first floor of the old building at ROSE LAW FIRM a box was to be picked up for destruction. Previous to SMITH's employment at ROSE LAW FIRM, he was not aware of when the shredding was occurring, and he set up the twice a week pick up when he began employment at ROSE LAW FIRM. SMITH could not comment on the volume of shredding that occurs but advised that typically the couriers would carry down a brown box with handles to shred. SMITH added that some of the other duties of the couriers involved deliveries in and out of the building, handling the mail and the shredding which they did twice a week.

SMITH provided the following work schedules for each of the couriers:

| <u>Name</u>     | <u>Frequency</u>                                   | <u>Hours</u>                                      |
|-----------------|--|---|
| CURT FRIEBERG   | Daily  | 8:00 A.M. to 5:00 P.M.                            |
| CLIFTON WHITE   | Daily  | 7:00 A.M. to 3:00 P.M.                            |
| JEREMY HEDGES   | Monday, Wednesday,<br>Friday                       | 9:00 A.M. to 5:00 P.M.                            |
| CLAYTON LINDSEY | Daily  | 12:30 P.M. to 5:00 P.M.                           |
| BRENT LENLEY    | Monday, Tuesday,<br>Wednesday, Thursday,<br>Friday | 2:00 P.M. to 5:00 P.M.                            |
| MARK MC MAHON   | Monday, Wednesday,<br>Friday                       | 9:00 A.M. to 11:00 A.M.<br>2:00 P.M. to 5:00 P.M. |
|                 | Tuesday, Thursday                                  | 12:00 P.M. to 5:00 P.M.                           |

SMITH advised that usually one of the couriers would stay until sometimes as late as 6:00 P.M. in order to get out the FEDERAL EXPRESS items for the day. Usually the mail was picked up by 5:45 P.M., and, if there were no FEDERAL EXPRESS deliveries, the shift at that time was over. SMITH advised that there was no night shift for the couriers, and, after he left the building, usually there was only a cleaning crew left in his area. SMITH could not recall any late night deliveries and had no knowledge of any shredding occurring at night. SMITH emphasized that the shredding was actually a small part of the job which was only done on Tuesdays and Thursdays and was done usually by the person that picked up the boxes on those days.

29D-LR-35063

Continuation of FD-302 of LARRY AL SMITH, On 2/12/94, Page 3

SMITH advised that he and BOUCHER have master keys which SMITH believes will open most all of the offices at the ROSE LAW FIRM. This key also opens BOUCHER's room where the shredding machine is kept.

SMITH advised, on February 3, 1994, allegedly the day that documents concerning WHITEWATER and VINCENT FOSTER were shredded by unidentified personnel at the ROSE LAW FIRM, SMITH had left at approximately 6:15 that night after he had finished the FEDERAL EXPRESS items for that day. When SMITH left the building, he advised that only the cleaning people were left, and the door to BOUCHER's office was closed. SMITH had no knowledge of any individuals or any of his couriers going back into the ROSE LAW FIRM that evening. On February 3, 1994, SMITH advised that nothing unusual happened nor did he have any conversations with BOUCHER about the preceding evening. When SMITH came to work that morning at approximately 7:40 A.M., CLIFTON WHITE was already there, and BOUCHER showed up approximately five minutes later. SMITH advised that BOUCHER usually opens up the shredding room door when he comes in.

Concerning what happened to the material that is shredded, SMITH advised that it is usually taken out by BOUCHER or one of the couriers and put into a plastic bag. At that time, it is then taken out to a dumpster, although SMITH has not personally seen anyone place it into the dumpster. SMITH did not recall any items being carried out to the dumpster on February 4, 1994.

SMITH could provide no information about the ROSE LAW FIRM lock boxes.

When the couriers or BOUCHER shred documents, SMITH advised that he has no knowledge of what documents are being shredded. SMITH had no knowledge as to whether the couriers would read the documents prior to shredding them and advised that he cannot ever recall shredding or seeing documents relating to President or Mrs. CLINTON, VINCENT or LISA FOSTER, WHITEWATER, MADISON GUARANTY SAVINGS AND LOAN, DAVID HALE, or JIM GUY TUCKER. SMITH added that he had never been asked to shred anything unusual nor has he heard of anyone being asked to do this.

29D-LR-35063

Continuation of FD-302 of

LARRY AL SMITH

, On

2/12/94

, Page

4

SMITH advised that he has no knowledge about the computer system being used at ROSE LAW FIRM nor any knowledge concerning the deletions of files from the computer system.

Concerning the "Washington Times" article which appeared in the paper on September 9, 1994, SMITH advised that, after lunch on that day, he saw three copies of the article on his table. He was told by CLIFTON WHITE that the article was there, and that was the first time that SMITH read the article. SMITH did recall that his wife had said something about seeing something on the news concerning documents being shredded by individuals at the ROSE LAW FIRM, but he could not specifically remember which day this was. SMITH advised that he was not concerned about anything he was reading in the newspaper due to the fact that the items that they shredded was "normal stuff" that was picked up on a twice-weekly basis by the couriers. SMITH advised that he did not talk with any of his couriers specifically about the news article although they may have jokingly accused each other of doing the shredding.

SMITH advised that RON CLARK, managing partner at ROSE LAW FIRM, had spoken about a news article which was going to appear concerning WHITEWATER documents approximately one week before the article appeared in the "Washington Times." SMITH could not recall the date, but, at this meeting which was attended by almost all of the support staff at ROSE LAW FIRM, CLARK told the staff what was going on and that allegedly someone had shredded documents relating to WHITEWATER at the ROSE LAW FIRM. SMITH advised that he learned about this meeting being held through the computer E-Mail System, and, after he got this message, he deleted the message from his computer. The meeting was held in the dining room or break area at the ROSE LAW FIRM, and, although SMITH cannot be positive, he believes there were less than 50 people present during this meeting. Prior to this meeting, SMITH did recall BOUCHER mentioning something to SMITH about the WHITEWATER documents and the fact that someone in the firm had supposedly shredded these documents, but SMITH could not recall any more of this conversation. SMITH recalled that possibly CLIFTON WHITE was also present during this conversation. During this conversation, SMITH was not asked if he or his couriers had done the shredding. During the aforementioned meeting that CLARK had with all of the support associates, he advised the staff that there was also going to be a subpoena served for documents concerning the WHITEWATER, and none of these

29D-LR-35063

Continuation of FD-302 of LARRY AL SMITH, On 2/12/94, Page 5

documents could be destroyed. CLARK also asked if anyone had any knowledge about the shredding of the documents, and, if so, to relate this information to CLARK. SMITH recalled that no one had any comments to make to CLARK concerning this matter. SMITH advised that he had another meeting with CLARK on February 10, 1994, the day after the article came out, with himself, CLARK, JERRY JONES, and BOUCHER. During this meeting, CLARK advised that the FBI and the Independent Counsel wanted to talk with SMITH and some of the others, and they were to tell the truth, because they had nothing to hide. On the next day, February 11, 1994, there were two meetings which SMITH attended where CLARK spoke to some or all of the couriers who were previously mentioned. During both of these meetings, CLARK basically said the same thing that he had said to SMITH on February 10, 1994, that being that the FBI and the Independent Counsel wanted to speak with them, and they were to show up at the FBI Office and tell them the truth. SMITH recalled that the first interview with the FBI was scheduled to be at 10:00 A.M. on February 11, 1994, but, due to the ice storm that occurred in Little Rock on that date, the interviews were moved to February 12, 1994.

SMITH advised that he was told by JEREMY HEDGES that CLAYTON LINDSEY received a telephone call from the "Washington Times" approximately one week prior to the article appearing in the newspaper. When SMITH spoke with him, CLAYTON said he believes that it was someone at the "Washington Times," and, later when he saw the newspaper article, he believes it was the same person who wrote the article. During the telephone conversation, LINDSEY told the reporter that he did not know anything about the shredding that had occurred. SMITH also recalled that JEREMY HEDGES was called about a week prior to the article by an ASSOCIATED PRESS reporter, and he recalled HEDGES asking the reporter, "How did you get my name," in which HEDGES replied to SMITH later that the reporter stated he had obtained a list of the employees of the ROSE LAW FIRM. SMITH could not specifically recall what was said during the conversation but believes that HEDGES possibly said "I don't know anything about the shredding."

It is the opinion of SMITH that someone made up this entire matter, and he could not speculate as to who would have done this. SMITH advised that he has never talked to a reporter concerning this matter nor does he have any specific knowledge of any individuals who shredded documents after hours at the ROSE



29D-LR-35063

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

Continuation of FD-302 of

LARRY AL SMITH

, On

2/12/94

, Page

6

LAW FIRM or who had contacted the "Washington Times" allegedly to talk about shredding at the ROSE LAW, FIRM.

During one or several of the meetings that CLARK had with SMITH and the other couriers, they were told that, if the press calls them, they can say anything they want to the press.

SMITH advised that he saw BOUCHER when he left his office sometime late in the afternoon on February 11, 1994, but, after BOUCHER spoke with the FBI and the Independent Counsel on February 11, he had no conversations with him. SMITH added that he has not talked with BOUCHER prior to SMITH's interview on February 12, 1994.

SMITH advised that he is aware of a company called SMITH RECYCLING which does off-site shredding but advised that he had no other information about this other than that BOUCHER had told them on Wednesday, February 9, 1994, that boxes were being picked up by SMITH RECYCLING. Smith could not recall any other portions of this conversation.

SMITH recalled CURT FRIEBERG telling SMITH that FRIEBERG and BOUCHER shredded documents relating to VINCE FOSTER. SMITH could not specifically identify the date but did advise it occurred in either late January or early February of 1994. SMITH advised that he believes that FRIEBERG knew this was FOSTER's box because of initials that appeared on the box.

SMITH advised that there were two rooms which were used to store records although SMITH was not sure what these records were, and this practice started after the first of the year. SMITH advised that he did not pay much attention to this and learned about this through the computer E-Mail System.

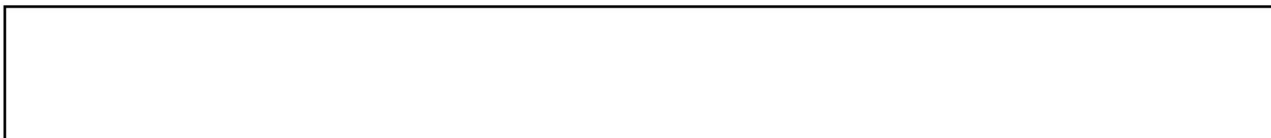
SMITH advised that no one has told him what to say or not to say to the writer or to the Independent Counsel during his interview on February 12, 1994. SMITH was asked specifically if he had hired the attorney that was present with him, and, at that time, KITTERMAN advised that he would advise his client not to answer any questions concerning who hired him, how much he was paid, and why he was being hired. During the course of the

29D-LR-35063

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

Continuation of FD-302 of LARRY AL SMITH, On 2/12/94, Page 7

interview, KITTERMAN asked if the Independent Counsel or the FBI was recording this conversation, and, if so, he requested a transcript and tape of the conversation, and Independent Counsel O'SULLIVAN advised on several occasions that the conversation was not being taped. The writer also informed KITTERMAN and SMITH that no recording devices were being used during this interview. Independent Counsel O'SULLIVAN asked KITTERMAN and SMITH if they were recording this conversation, and they both advised that they were not.



FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(3) - Fed. R. Crim. Pro. 6(e) - Grand Jury  
FOIA(b)(7) - (C)

FOIA(b)(7) - (C)

Date of transcription

2/14/94

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

On [redacted] Special Agent (SA) [redacted]  
[redacted] of the Little Rock Division of the Federal Bureau of  
Investigation (FBI)

[redacted]  
[redacted] SMITH advised the following:

SMITH stated that he did not, at that time, have any documents from the ROSE LAW FIRM which had not already been processed. He stated that these items were baled into bales of paper and mixed in with papers and documents from other firms or customers and had been stored for shipment to paper plants. He advised that the last pickup which his firm, SMITH RECYCLING, had made from the ROSE LAW FIRM was January 31, 1994, and the most recent prior pickup of papers from the ROSE LAW FIRM had occurred December 15, 1993. He stated that the items received from ROSE LAW FIRM on January 31, 1994, had not been sent to the paper companies as of the service of the subpoena, and he believed he could narrow down to approximately six bales of paper the bales into which ROSE LAW FIRM documents had been mixed. Those six bales were baled on February 1, February 2, or February 4, 1994, and the total weight of paper for all six would be somewhere between 12,000 and 14,000 pounds. He stated that the bales are tagged, and he knows which ones they are.

When questioned about the processing, he advised that the papers had been compacted into the bales, but they had not been shredded. SMITH was then advised by SA SMITH not to dispose of the bales of paper nor to destroy them without first talking with JULIE O'SULLIVAN at the Office of the Independent Counsel.

[redacted]

Investigation on 2/12/94 at Pine Bluff, Arkansas File # 29D-LR-35063 *5011-8*

by SA [redacted] Date dictated 2/12/94

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29D-LR-35063

Continuation of FD-302 of EDWARD HOWELL SMITH, On 2/12/94, Page 2

SMITH provided the following information regarding himself:

|                                       |  |
|---------------------------------------|--|
| Name                                  | EDWARD HOWELL SMITH                          |
| Race                                  | White  |
| Sex                                   | Male   |
| Date of Birth                         | [Redacted] FOIA(b)(6)                        |
| Place of Birth                        | [Redacted]                                   |
| Height                                | 6'   |
| Weight                                | 170 pounds                                   |
| Hair                                  | Brown  |
| Eyes                                  | Hazel  |
| Social Security Account Number (SSAN) | [Redacted]                                   |
| Residence Address                     | 4020 Linden,<br>Pine Bluff, Arkansas         |
| Employed Position                     | SMITH RECYCLING SERVICES<br>President        |
| Mailing Address                       | P.O. Box 9389,<br>Pine Bluff, Arkansas 71611 |
| Work Telephone                        | (501) 536-2225                               |
| Facsimile Number                      | (501) 534-5521                               |

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription 2/14/94

JOYCE ANNE MC KINNON appeared at the Little Rock Office of the Federal Bureau of Investigation (FBI) for an interview at approximately 11:30 A.M. Mrs. MC KINNON identified herself as having been born on [redacted] residing at 42 Colony Road, Little Rock, Arkansas 72207, telephone number (501) 225-0580. Also present during the interview were PAT SMITH, Assistant to the Special Counsel ROBERT FISKE, and ALDEN L. ATKINS, attorney with the firm VINSON AND ELKINS, 1455 Pennsylvania Avenue, Northwest, Washington, D.C., telephone number (202) 639-6613. Mr. ATKINS stated that he was the attorney representing Mrs. MC KINNON. Mrs. MC KINNON was advised of the identity of the interviewing Agent and of the purpose of the interview.

At the beginning of the interview, Mr. ATKINS stated that Mrs. MC KINNON had worked with JERRY JONES, attorney for the ROSE LAW FIRM, on a closed litigation matter involving the company TCBY in order to determine which documents were to be shredded. Mr. ATKINS indicated that some of the boxes concerning TCBY files were marked with the initials of VINCENT FOSTER. Mr. ATKINS clarified that he did not want questions asked which might relate to attorney/client privileged information. He stated that TCBY has not waived this attorney/client privilege.

Mrs. MC KINNON stated that she is currently employed by ROSE LAW FIRM as a legal secretary. She said that her immediate superior is KENNETH R. SHEMIN, an attorney with the ROSE LAW FIRM. She stated that she started as a temporary floating secretary in October, 1981, and began permanently working with Mr. SHEMIN in April or May, 1982. She stated that she has also worked with Attorneys JERRY JONES, JESS ASKEW, VINCENT FOSTER, and WEBB HUBBELL. She stated that she also works with two file clerks in relation to Mr. SHEMIN's work, and these two file clerks are SANDRA HATCH and KARA (Last Name Unknown [LNU]). She stated that KARA is a part time employee.

FOIA(b)(7) - (C)

*x orig. in sub A*  
*cc: main file 2/17/93*  
Investigation on 2/14/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 11-16

by SA [redacted] Date dictated 2/14/94

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

29D-LR-35063

Continuation of FD-302 of JOYCE ANNE MC KINNON, On 2/14/94, Page 2

Mrs. MC KINNON advised that the document retention policy at the ROSE LAW FIRM does not consist of a specified or set period of time at the end of which documents are destroyed. She stated it depends on the individual case and the individual lawyer as far as which records are retained and for how long they are retained. She explained that the originals of evidentiary items are normally returned to the client, and copies of these evidentiary records are shredded by ROSE LAW FIRM. The lawyer who handled the case would normally decide the time of this shredding. She said that, on the average, records are kept six months up to a year at least after a case has been completed. She explained that, as a normal procedure, she would approach the attorney and ask him, "Can I remote these files." He would then review them and let her know whether to retain the files, send them to remote storage for retention, or for shredding. She stated she does not know if a record is kept of what files have been or are being shredded. She stated that all records now are being copied onto microfiche. She advised that she is unsure as to how long this has been in effect but believes that it may have been in about 1985 or 1986 when records were being copied for retention on microfiche. She stated that hard copies of records which had been on microfiche are then destroyed. She said that the copying of records onto microfiche is carried out by a lady at the remote storage facility named ANNE. She said the other person who works at this remote storage facility is a lady named RIKI (phonetic). She said that she is not aware of any outside firm which conducts copying of records onto microfiche. She added that the organization of files being maintained by the secretaries of each attorney differs from one secretary to the next. She explained that she keeps an index of all of her files being maintained by her (MC KINNON).

She stated that LORAIN CLINE, formerly the legal secretary for VINCENT FOSTER, is still employed at the ROSE LAW FIRM and currently works for Attorney JESS ASKEW and SAM STRANGE. She advised that CLINE was the only secretary responsible for FOSTER's files. She stated that she never saw any documents or files related to MADISON GUARANTY SAVINGS AND LOAN, WHITEWATER DEVELOPMENT, DAVID L. HALE, JIM GUY TUCKER, BILL CLINTON, or VINCENT FOSTER, explaining that she has seen FOSTER's name on files which were being handled by FOSTER. These files include cases involving TCBY and the company ARTHUR MURRAY INTERNATIONAL. Regarding the TCBY case, she stated that she had been asked during the fall of 1990 to go to the paralegals employed by TCBY

29D-LR-35063

Continuation of FD-302 of JOYCE ANNE MC KINNON, On 2/14/94, Page 3

to assist them in organizing evidence which was to be turned over to ROSE LAW FIRM in connection with the case. She then had no other contact with this case because she was involved in another matter which was due to go to trial in December, 1990. Then, in about May of 1991, she was asked to review evidence which had been received in the TCBY case because one of the paralegals for TCBY had quit her job. She stated that the TCBY case was settled before FOSTER left the ROSE LAW FIRM. Thereafter, the files were kept in a so-called "war room." She stated there were also other documents stored in the "war room."

She stated that, on January 26, 1994, Attorney JERRY JONES asked her to go through the TCBY records and destroy all duplicates of records related to this matter. She stated that some of the boxes containing these records were labeled with VINCENT FOSTER's initials and had other labels on them such as "loose papers." She said that she went through these records and placed documents to be destroyed in boxes destined for shredding. She said that the maintenance man for ROSE LAW FIRM, BOB BOUCHER, then took the boxes as she had several of them ready and delivered them in a ROSE LAW FIRM delivery truck to the remote storage facility for shredding. Boxes in the "war room" aside from the TCBY boxes included several boxes from Attorney JERRY JONES. She explained that JONES moved into the office previously occupied by FOSTER. At the time of this move, JONES placed several boxes into the "war room." These boxes and others had to be moved into another room next door to the one which contained the TCBY files. She stated that, as she went through the TCBY records, she would, after looking at the documents, remove all paper clips and rubber bands and, in most cases, file covers and place them in empty boxes. She recalled one of these boxes had the initials of JERRY JONES written on the outside. As she reviewed these documents, she did give them a quick glance but did not remember seeing any documents related to the following names: WHITEWATER, DAVID L. HALE, JIM GUY TUCKER, BILL CLINTON, and MADISON GUARANTY SAVINGS AND LOAN. She stated she did recall seeing HILLARY CLINTON's name on some documents because HILLARY CLINTON was, at one time, a member of the Board of Directors for TCBY. FOSTER's name was on the documents because he was involved in the handling of the case. She said that BOUCHER moved five to six boxes at a time as she got them filled up with documents for shredding. She stated there were a total of about fifteen file boxes and ten to fifteen bankers boxes. BOUCHER took them to the remote storage at her (MC KINNON's) instructions for shredding.

29D-LR-35063

Continuation of FD-302 of JOYCE ANNE MC KINNON, On 2/14/94, Page 4

The instructions to shred these documents were given by JERRY JONES. She recalled BOUCHER telling her that the shredding company would come on Monday, January 31, 1994, to pick up material for shredding. At that time, MC KINNON was not finished reviewing all of the documents. She stated that BOUCHER took more documents to the remote storage facility on February 1, 1994. She said that she finally finished her review of documents on the following day, February 2, 1994. After that, BOUCHER told her that all of the boxes had been taken to the remote storage facility. She stated that she placed her initials "JM" on each box and the word shred. She said that normally shredding is carried out by the couriers inside the ROSE LAW FIRM's building except when there is a massive quantity of documents to be shredded as in the TCBY case.

As concerns normal shredding at the ROSE LAW FIRM, she stated that each secretary has a separate garbage can by her desk where all documents related to clients which are to be shredded are placed, and, when the can is full, she would call one of the couriers or BOB BOUCHER to come pick the documents up for shredding. She stated that, unless there was more than one or two boxes of documents, it was generally the practice to have them shredded by the couriers in the basement.

Mrs. MC KINNON stated she became angry when she first saw the article in the "Washington Times" on February 9, 1994, regarding the alleged shredding of WHITEWATER documents at the ROSE LAW FIRM. She explained that this type of activity did not sound like anything ROSE LAW FIRM engaged in. She did not see the article until after the managing partner of ROSE LAW FIRM, RON CLARK, had sent an E-mail message to all employees saying that he had been contacted by the "Washington Times" about WHITEWATER document shredding. CLARK asked that all calls from reporters be referred to him. At the same time, CLARK stated in his message that those people who wished to talk to reporters could do so. Inasmuch as the article mentioned a large number of documents having been shredded, MC KINNON thought that they might be referring to her boxes of TCBY records, particularly since she had carried out the review of records for shredding at about the same time as the activity discussed in the article allegedly took place. MC KINNON stated she did send an E-mail message back to RON CLARK relaying her suspicion that the article might be referring to the boxes of TCBY records.



29D-LR-35063

Continuation of FD-302 of JOYCE ANNE MC KINNON, On 2/14/94, Page 5

She stated that a meeting was held by CLARK including all the secretaries and staff wherein he again mentioned the article and stated that no one at the firm had or would destroy documents related to WHITEWATER. CLARK did say that he wanted to know if anyone had done this. She stated that she recalls a memo with instructions from CLARK advising that FOSTER documents should not be destroyed. She does not remember when this memo came out. She added that she did write a memo on February 8, 1994, which contains a list of all TCBY files which she had designated for destruction.

Mrs. MC KINNON stated that Attorney JERRY JONES called her on Sunday, February 13, 1994, and asked her if she remembered the day when she started the review of the TCBY files for destruction. JONES asked MC KINNON if she looked at the documents as she reviewed them. He also said that assistants to the Special Counsel ROBERT FISKE might wish to talk to her.

She stated that DONNA COLLINS is the person responsible for maintenance of the software at ROSE LAW FIRM. She stated that access to computer files at ROSE LAW FIRM was generally not restricted. She advised that an individual could protect their files through use of a password if desirable. She said that she is not aware of the destruction of any computer files, advising that she remembers that all TCBY-related computerized data had been taken off the system and put onto a separate tape. She also explained that she had some backup disks of TCBY-related information.

She advised that the only person she remembers having left the ROSE LAW FIRM during the recent past is a paralegal named CAROLYN REHM, who worked in the litigation department. She stated that Ms. REHM left on January 31, 1994, to go to work for a florist in Conway. REHM apparently lives in Conway and is soon to be married there.

She reiterated that no shredding is done without the authorization of one of the attorneys at the ROSE LAW FIRM, except in such instances as when a secretary has single piece of paper or a single copy of a document which is extra and is not needed. Such pieces of paper or extra copies are then placed by the secretary into the previously described garbage can for shredding purposes. She stated that boxes of files, however, would certainly never be shredded without the authorization of an

29D-LR-35063

Continuation of FD-302 of JOYCE ANNE MC KINNON, On 2/14/94, Page 6

attorney. She did state that it is the policy of the law firm to try to reuse boxes and even file folders where ever possible. She said she recently sent two boxes with empty file folders to the courier station. These boxes had the initials of VINCENT FOSTER written on the outside. She said she had sent the boxes to the courier station for reuse or for shredding.

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription

2/22/94

FOIA(b)(6)

JERRY JONES, a white male, date of birth [redacted] #4 Hillendale Drive, Little Rock, Arkansas, was interviewed at the Little Rock Office of the Federal Bureau of Investigation (FBI). Present during the interview were JULIE O'SULLIVAN, Office of the Independent Counsel; Special Agent [redacted] FBI; MIKE BUXTON; and ALDEN ATKINS of the law firm ROSE LAW FIRM. After being advised of the identities of the interviewers and the nature of the interview, JONES provided the following information:

JONES advised that he is an attorney at the ROSE LAW FIRM, Little Rock, Arkansas, in charge of the litigation section and has been with the firm since May of 1980. He advised that he and VINCENT FOSTER served as Co-Lead Counsel in a litigation involving TCBY that had been brought by an asserted class of shareholders. JONES characterized the case as a "securities suit." He advised that a settlement agreement was reached in June of 1992 in the Eastern District of Arkansas in Judge STEPHEN M. REASONER's court. JONES further advised that a final conference hearing was held in August or September of 1992. JONES identified attorneys JESS ASKEW, JESS FREEMAN, and WEBSTER HUBBELL and paralegals JOYCE MC KINNON and CAROLYN REHM as individuals who primarily worked on the TCBY matter.

JONES stated that, upon completion of the confidential final hearing, FOSTER asked the paralegals to discard sensitive TCBY documents. He stated that the type of documents to be discarded or shredded included internal client documents, data bases, client calendars, analyst reports, and other types of TCBY documents. JONES stated that all pleadings, correspondence, etc., were kept by the firm. He further stated that the plaintiff's attorneys were required by agreement to return all of their sensitive TCBY documents for destruction as well. JONES further stated that the TCBY documents were comprised of 10 to 12 file drawers of material.

*cc: orig. sub A*

*2910 - # 35063 - 111-25*

Investigation on 2/14/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 2/14/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 99

*(Handwritten marks and initials)*

29D-LR-35063

Continuation of FD-302 of JERRY JONES, On 2/14/94, Page 2

JONES advised that his office is located on the third floor and that the TCBY documents were kept in an office known as "The War Room" next to his. He advised that, to his recollection, a memo stating that all of the TCBY documents had been destroyed was generated. He advised that he thought the document destruction was completed approximately two weeks after January 14, 1994, which was his son's birthday. JONES further advised that MC KINNON was primarily responsible for ensuring the destruction of the TCBY documents but that he did remember seeing BOB BOUCHER, the maintenance man, carting some of the documents off on a green dolly.

JONES stated that Tuesdays and Thursdays are shredding days at the firm. He stated that he knows this because LARRY SMITH, the courier supervisor, circulated a memo stating this. He stated that he does not remember ever using the shredder and really never knew how the shredding was accomplished.

JONES advised that the firm had concerns that their trash was being searched during the Presidential campaign of 1992 and has been extra sensitive about destruction of sensitive documents. He advised that the firm's document retention policy is an ad hoc one and that it is left up to the attorney in charge of the file to determine what to do with it. JONES advised that he has no knowledge of a formal policy regarding document retention.

JONES stated that the firm has a local area network (LAN) computer system that he personally uses for some Word Perfect and E-Mail functions. He stated that he thought files could have locked access but that he was not positive. He stated that there is also a summation program that will allow the searching of depositions, will scan documents, and will provide a document summary. JONES further stated that the TCBY document data base was archived and then returned to the system on the morning of February 14, 1994.

JONES advised that he recalled the firm's receipt of a Federal Grand Jury subpoena on January 13, 1994. He advised that this was very unusual and that the Executive Committee, comprised of himself, RONALD CLARK, PHIL CARROLL, HERB RULE, KEVIN BURNS, BRENT BUCK, DAVID SMITH, and possibly WILSON JONES met at lunch to discuss the subpoena. He advised that the committee talked about the subpoena and about the firm retaining counsel. JONES

29D-LR-35063

Continuation of FD-302 of JERRY JONES, On 2/14/94, Page 3

further advised that they decided that each section, including litigation, tax, commercial, and labor would notify the attorneys in their respective sections to discuss the subpoena. He further advised that he notified the litigation attorneys and told them what items had been requested in the subpoena but could not remember if he gave them a copy of the list of the items subpoenaed.

JONES stated that the firm attempted to mobilize very quickly to gather the documents requested as they were very sensitive to the impact the subpoena would have on their business. He stated that, prior to receipt of the subpoena, the firm anticipated that some Government agency would want any files on the WHITEWATER DEVELOPMENT CORPORATION (WWDC) and other entities involved with that corporation. He stated that the firm retained VINSON AND ELKINS, a firm in Washington, D.C., to represent them, as well as TOM RAY, as they wanted to open a dialogue with the Department of Justice attorneys who issued the subpoena. JONES stated that on the afternoon of January 13, 1994, the same day the subpoena was issued, the subpoena was withdrawn, but he did not know why. JONES further stated that he was not sure if the administrative staff of the firm was notified of the subpoena but that a memo was sent to all attorneys asking them to gather any documents related to the subpoenaed entities and to notify CLARK, who was managing the process.

JONES advised that he and CLARK met frequently as they were designated as counsel to the firm. He advised that all pertinent documents had been put in a room to which he, CLARK, and CARROLL have keys. JONES advised, however, that he doubted the room was locked all day.

JONES stated that he is aware of preliminary memorandums being prepared for counsel by GARY SPEED, RICK DONOVAN, CARROLL, CLARK, and possibly RICK MASSEY regarding WWDC, FROST AND COMPANY, etc., that may have been discarded. He stated that they would only have been drafts and that the finished product should be in existence.

JONES advised that MC KINNON told him that she sent a box of empty file folders with FOSTER's name on them to be shredded approximately two to three weeks ago. He advised that these would have gone to the basement where the only shredder he is aware of is located. JONES advised he was not sure if

29D-LR-35063

Continuation of FD-302 of JERRY JONES, On 2/14/94, Page 4

shredded drafts occurred on February 3, 1994. He advised that several years ago a gray and black shredder was near the workout room but is no longer there.

JONES stated that he attended a meeting with CLARK and all the firm couriers on Friday, February 11, 1994. He stated that he told KURT FRIEBERG, a courier, that, if he was questioned about the firm's clients in an interview with the Government on February 12, 1994, to not answer until he could speak with the firm's attorneys. He further stated that CLARK told the couriers that he had no knowledge of any shredding of WWDC documents and that it should not be occurring. JONES further stated that JEREMY HEDGES, a courier, stated that he had shredded a box of FOSTER documents and that HEDGES told him that he assumed they had to do with WWDC. He stated that this information "floored him" and that he asked HEDGES what the documents looked like. JONES further stated that he told HEDGES to be very cautious regarding assumptions and facts when speaking with the Government. He further stated that his interpretation, after talking with HEDGES, was that he had not read the documents he shredded.

JONES advised that he and CLARK talked with HEDGES and CLAYTON LINDSEY, a courier, on Wednesday or Thursday, at which time LINDSEY told them a Washington Times reporter had called but that he told the reporter, "No comment."

JONES stated that, after the report alleging shredding of documents appeared in the Washington Times on Wednesday, February 9, 1994, he and CLARK spent the day in CLARK's office in a state of disbelief. He stated that they did not believe the shredding occurred but that, if it had, it needed to stop. He stated that the firm was mad about the slandering by the Washington Times and called their counsel with instructions for them to contact Mr. FISKE, Independent Counsel, and offer the full cooperation of the firm. JONES further stated that an E-Mail message was sent around the firm regarding the article but that no gag order was placed on employees. JONES characterized the article as a public relations/political issue with the firm being placed in the middle.

29D-LR-35063

Continuation of FD-302 of JERRY JONES, On 2/14/94, Page 5

JONES advised that he speculated that couriers were sources of the information contained in the Washington Times article. He advised that he has a low opinion of the Washington Times and thinks that the article may be totally false. He advised that his firm is seriously considering suing the Washington Times over the article.

JONES stated that several FOSTER boxes had been stacked in the basement by the entrance from the alley. He stated that these boxes contained a "mishmash" of FOSTER files. He stated that he asked HEDGES if the box he shredded came from the stack but does not recall his answer. JONES stated that the firm had gone through a listing of FOSTER's files to determine if records asked for in the first Federal Grand Jury subpoena were located in his files. He further stated that he does not know if anyone has physically gone through FOSTER's files but that CLARK would know.

JONES advised that the FOSTER boxes located in the basement area are not sealed but are now safeguarded in a locked room.

JONES stated that some remote storage is on microfiche.

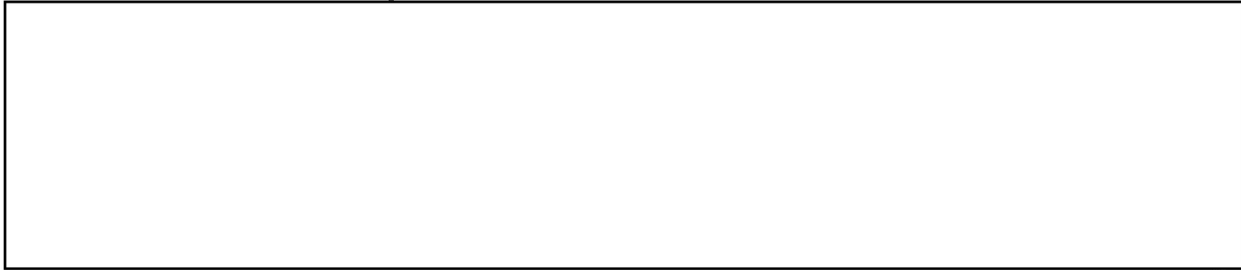
JONES advised that he talked with MC KINNON on the evening of Sunday February 13, 1994, regarding her talking with the FBI on February 14, 1994. He advised that he asked her questions regarding the TCBY records clean out process, when and how it occurred, and what was contained in the discarded documents. He further advised that he did not tell MC KINNON what to say and to only tell the truth.

JONES stated that he knows of no destruction of any documents relating to WWDC, MADISON GUARANTY SAVINGS AND LOAN, JIM MC DOUGAL, HILLARY CLINTON, or FOSTER records relating to those entities.

FEDERAL BUREAU OF INVESTIGATION

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

Date of transcription 5/9/94



*Handwritten mark resembling a circle with a line through it.*

*Orig - sub A  
Copy - sub 11*

Investigation on 5/6/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 11er  
by SA KLAUS WOLFENBERGER/dgf Date dictated 5/6/94

29D-LR-35063-Sub 11-96  
SERIALIZED  FILED   
MAY 10 1994  
FBI - LITTLE ROCK  
*Handwritten initials: pvt pdl*

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 104



FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription

4/5/94

PATRICIA JOAN HERITAGE, born [redacted] Social Security Account Number [redacted] arrived as requested for an interview at the Office of the Independent Counsel, ROBERT B. FISKE JR., Two Financial Centre. She was advised of the identity of the interviewing Agent and the purpose of the interview. HERITAGE advised she is currently employed as associate lawyer at the ROSE LAW FIRM in Little Rock and resides at 602 Parkway Place Drive, Little Rock, Arkansas 72211, telephone (501) 224-9110. HERITAGE was accompanied by JOHN M. BELEW, attorney, who has his law office at 500 East Main, Suite 208, Batesville, Arkansas, 72503, telephone (501) 793-4247. Also present and conducting the interview was JULIE R. O'SULLIVAN, Assistant to Independent Counsel FISKE. BELEW predicated the interview by stating that HERITAGE would be cooperative in providing information and that, with regard to her current employment, it was common knowledge at ROSE LAW FIRM that HERITAGE was being interviewed by representatives of Independent Counsel FISKE. Information provided by HERITAGE, in part and in substance, is as follows:

HERITAGE advised she plans to leave the ROSE LAW FIRM within the next few weeks, partly because she intends to be married in May 1994.

HERITAGE stated that her superiors at the ROSE LAW FIRM were aware that she had been asked for an interview by the Federal Bureau of Investigation. Prior to coming to the interview, she was offered the services of an attorney by the ROSE LAW FIRM which she declined to accept.

She explained that she had worked with HUBBELL as an associate attorney before HUBBELL was appointed to the U.S. Department of Justice. She stated that she became aware of HUBBELL's overbilling of clients through the paralegal clerk who was also assigned to work with HUBBELL. The paralegal clerk pointed out and provided her with copies of checks paid by overbilled clients. She stated that one of the most overbilled clients was the RTC on the FROST litigation matter. She saw bills to clients whereon HUBBELL charged what were apparently his

cc: orig-Sub A

Copy - Sub 11

FOIA(b)(7) - (C)

Investigation on 3/31/94 at Little Rock, Arkansas File # 29D-LR-35063-Sub 11

29D-LR-35063-Sub 11-93

LLS LLS

by SA [redacted] Date dictated 4/4/94  
FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 105

29D-LR-35063 Sub 11

Continuation of FD-302 of PATRICIA JOAN HERITAGE, On 3/31/94, Page 2

personal expenses against the hours worked by HERITAGE for a particular client on a particular date. She is also aware that HUBBELL wrote off charges on draft bills for his personal expenses and inserted fee charges for his time that were false.

She advised that the paralegal clerk is especially worried, and she (HERITAGE) felt that the ROSE LAW FIRM would regard her and the paralegal as scapegoats in any allegations against HUBBELL. HERITAGE said she would maintain copies of the above-described checks in her possession.

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription 3/24/94

MARY RUSSELL, date of birth [redacted] address 809 North Jackson, Little Rock, Arkansas 72205, telephone number 501/666-6279, was advised of the identity of the interviewing Agent and furnished the following information, in part and in substance:

RUSSELL worked at the ROSE LAW FIRM from 1982 through 1993. Her title at the time that her employment expired was "Operations Manager". Her daily duties included ordering supplies, supervising couriers, and supervising the mail room!

RUSSELL advised that shredding of documents was a daily activity. RUSSELL didn't allow the shredders to pick up the material that was to be shredded until noon. Each attorney had 2 garbage cans; 1 for shredding and 1 for regular thrash. Each copy room also had a shred box. The material identified for shredding was shredded downstairs at the law firm.

RUSSELL stated that ROSE has always had documents shredded primarily to protect the privacy of their clients. The reason ROSE started doing the actual shredding themselves was because the company that had been shredding for them no longer did. RUSSELL further advised that there were people going through the thrash bins at the law firm during the time of the presidential campaign but that this within itself did not engender the shredding. Again, she stated that the primary reason for the shredding was to protect their clients.

RUSSELL advised that JEREMY HEDGES was not the type to actually sort through boxes to ascertain what was contained in them. Most of the shredders viewed the shredding as a mundane task and did everything in their power to expedite the process. So it was highly unlikely that HEDGES or any of the other couriers actually knew what was contained in the boxes of information that was shredded. In addition, RUSSELL stated that boxes with names of clients delineated on them were used over and over, and that it is possible for a box delineated VINCE FOSTER to have contained other nebulous and unrelated information.

CC: OIG - Sub A  
Copy - Sub 11

29D-LR-35063-Sub 11-91

SEARCHED INDEXED SERIALIZED FILED  
MAR 24 1994  
FBI - LITTLE ROCK

FOIA(b)(7) - (C)

Investigation on 3/23/94 at LITTLE ROCK, ARKANSAS File # 29D-LR-35063 (SUB 11)

by SA [redacted] Date dictated 3/24/94  
FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 107

Continuation of FD-302 of MARY RUSSELL, On 3/23/94, Page 2

RUSSELL added that she supervised couriers for four to ten years and does not recall any courier ever being concerned with what was in the boxes that were to be shredded. Further, that HEDGES was not conscientious enough to be concerned with what was contained in the boxes, thus it is highly unlikely that he actually delved into the contents of the boxes.

RUSSELL added that the attorneys at ROSE are smart and that if they wanted to cover something up, there were capable of doing just that. Access to the shredder was not limited; thus, RUSSELL feels that it is highly unlikely that attorneys attempting a cover up would allow couriers to shred esoteric information.

RUSSELL reported to CAROLYN HUBER while employed at ROSE. HUBER was the administrative manager at ROSE. HUBER is now employed with the current Presidential administration.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/28/94

PHILIP HANSFORD JOHNSON, 14 Beverly Place, home telephone number 664-1135, was contacted at his residence. After being advised of the personal and official identities of the interviewing Agents and the nature of the interview, JOHNSON provided the following information in part and in substance:

JOHNSON stated he worked as a courier for THE ROSE LAW FIRM (TRLF), 120 Fourth Street, for several years. JOHNSON stated he is unable to recall the exact dates of his employment. However, JOHNSON did recall working for TRLF approximately three and a half years, going to Mexico for a semester, and then returning to TRLF for approximately six months. JOHNSON stated that, during the last six-month period he worked for TRLF, BILL CLINTON was running for President, but had not yet been elected. JOHNSON stated he left TRLF in May 1992.

JOHNSON stated that, as a courier for TRLF, his job responsibilities were shredding papers and delivering documents and packages to other law firms. JOHNSON stated that TRLF had one shredder, which was located in the basement of TRLF known as the courier area. JOHNSON advised the documents to be shredded were brought down to the basement by the couriers and placed by the shredder. JOHNSON stated the couriers obtained the documents to be shredded from the attorneys' desks. The attorneys specified which documents were to be shredded by placing them in a particular location, such as in the corners of their offices, or by giving the documents to their secretaries, who then gave them to the couriers.

JOHNSON stated the documents to be shredded were brought to the basement in boxes. JOHNSON stated the attorneys placed their initials or names on the documents themselves, but not on the boxes used to bring the documents to the shredder. JOHNSON stated he never read any of the documents he shredded.

cc: orig - Sub A

Copy - Sub B

FOIA(b)(7) - (C)

29D-LR-35063-Sub B-90

Investigation on 3/10/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 1a

by SA  Date dictated 3/24/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 109

29D-LR-35063 Sub 11

Continuation of FD-302 of PHILLIP HANSFORD JOHNSON, On 3/10/94, Page 2

While he was employed by TRLF, JOHNSON stated that documents were not always shredded. Approximately two months before JOHNSON stopped working for TRLF, a meeting was held for the entire firm. At that meeting, JOHNSON stated his supervisor, MARY RUSSELL, advised that the firm was going to start doing things differently. It was at that time that TRLF began shredding documents. JOHNSON believed documents were being shredded to prevent the media from obtaining information regarding HILLARY CLINTON.

JOHNSON stated that, to his knowledge, the shredding of documents took place during normal business hours. JOHNSON stated he did not work past 5:00 p.m., he did not work weekends, and he did not work any overtime hours. JOHNSON advised he is not aware of any other courier who worked overtime hours or on weekends.

JOHNSON stated he currently is employed on a temporary basis by RATHERS & JENNINGS, a landscaping company in Little Rock, Arkansas. JOHNSON stated he has not spoken with anyone currently employed by TRLF. JOHNSON stated that MICHAEL D'JARNETTE (phonetic) is the only courier with whom he worked who is still employed by TRLF.

The following was obtained through observation and interview:

|               |  |
|---------------|--|
| Name          | PHILIP HANSFORD JOHNSON                    |
| Race          | White                                      |
| Sex           | Male                                       |
| Date of Birth | [REDACTED] ----- [FOIA(b)(6)]              |
| Address       | 14 Beverly Place,<br>Little Rock, Arkansas |

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription

3/29/94

FOIA(b)(6)

MARGARETE ELIZABETH, (Maggie) CROCKER, (white female born [redacted] was telephonically contacted at her residence in San Antonio, Texas, by Special Agent [redacted] Federal Bureau of Investigation (FBI). Ms. CROCKER was advised that this interview concerned the allegation that "Whitewater" documents were destroyed by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

Ms. CROCKER advised her present residence address is 1700 Jackson Keller Street, Apartment 314, San Antonio, Texas 78213, telephone number (210) 979-0467. She stated she is presently employed as a teacher at the Serna Elementary School, San Antonio, Texas, telephone number (210) 599-0110.

Ms. CROCKER advised she was employed as a courier by the ROSE LAW FIRM from August 1991 until April 1992. She advised that she started there following graduation from Tulane University and stayed with the Firm until she went to graduate school at Trinity University. She advised that, as a courier, her duties included, but were not limited to, transporting files, mail, etc., and shredding files and documents. She advised that she usually worked from 8:00 a.m. to 5:00 p.m., Monday through Friday.

Ms. CROCKER advised that the Firm had only one shredding machine and to the best of her recollection, it was there when she started to work for the Firm. She stated that the shredding machine was located in the basement of the main office. She advised that she was assigned to shred on many occasions.

Ms. CROCKER advised that she made many trips to the Firm's remote storage facility as did all the couriers. She advised the door was always locked and she was admitted by one of the women who worked in the facility. She advised that she never

CC: OIG - Sub A  
Copy - MAIN  
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LS

(telephonically)

Investigation on 3/28/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 3/29/94

29D-LR-35063

Continuation of FD-302 of MARGARETE ELIZABETH CROCKER, On 3/28/94, Page 2

saw any shredding take place at the facility and does not believe that there was a shredding machine located there. She stated that she never saw a uniformed guard at the remote storage facility. She stated she is unaware of any commercial shredding having been done at the remote storage facility while she worked for the ROSE LAW FIRM.

Ms. CROCKER advised that she was involved in the shredding of many items on a routine basis, but advised she cannot recall specifically shredding anything she knew to have been associated with any of the following:

VINCENT FOSTER, JR.  
 BILL CLINTON  
 HILLARY CLINTON  
 WHITEWATER DEVELOPMENT  
 MADISON GUARANTY SAVINGS & LOAN  
 JIM GUY TUCKER  
 DAVID HALE

Ms. CROCKER advised she is aware of the allegations concerning the shredding of a box of Mr. FOSTER's files, which allegations have appeared in the newspaper recently. She stated she has no personal knowledge of any such shredding as alleged by the news media.

Ms. CROCKER advised she has not been contacted by either anyone from the ROSE LAW FIRM or any representative of the news media.

Ms. CROCKER advised that, now that she is fully aware of the Government's interest in this matter, she will report any information which she may receive from any source which she believes might be of interest to the Independent Counsel.

Ms. CROCKER provided the following information:

|      |                             |
|------|-----------------------------|
| Name | MARGARETE ELIZABETH CROCKER |
| Aka  | Maggie Crocker              |
| Race | White                       |
| Sex  | Female                      |
| DOB  |                             |
| POB  |                             |
| SSAN |                             |

FOIA(b)(6)



FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/23/94

FOIA(b)(6)

COURTNEY NEWTON LITTLE, a white male, date of birth [redacted] #3 Colony Road, Little Rock, Arkansas, telephone number (501) 582-2002, was contacted at his residence. After being advised of the identities of the interviewing Agents and the nature of the interview, LITTLE provided the following information:

PI  
Rdu

LITTLE advised that he worked at the ROSE LAW FIRM as a courier from October until Christmas of 1992. He advised that he worked approximately 25 hours a week, primarily in the afternoon after attending class at the University of Arkansas at Little Rock. He advised that his duties included picking up mail from attorneys, personal deliveries to other law firms, shredding documents, and making final runs to the post office. LITTLE further advised that a former fraternity brother got him the job at the firm.

LITTLE stated that anything in the various attorneys' trash would usually be shredded. He stated that newspapers and garbage were thrown with regular trash but very little else. He stated that on some days there would be seven to eight boxes of documents to be shredded. LITTLE further stated that each courier was assigned an area of the firm in which to pick up documents to be shredded. LITTLE stated that the standard procedure entailed picking up file boxes with documents to be shredded and taking them downstairs to the shredder located next to the pool area.

LITTLE advised that he never worked later than post office hours and that neither he nor the other couriers ever worked past 5:30 p.m. He advised that all of the partners were usually gone by 5:30 p.m. as well at the latest and that only associates worked late hours.

LITTLE stated that, when he left the ROSE LAW FIRM, they were putting everything on microfiche and storing file boxes in a warehouse near CAJUN'S WHARF RESTAURANT until they were put on the microfiche.

cc: orig-subA  
Copy - sub11

29D-LR-35063-Sub 11-88

FOIA(b)(7) - (C)

Investigation on 3/11/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 11

by SA [redacted] Date dictated 3/18/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 113

29D-LR-35063 Sub 11

Continuation of FD-302 of COURTNEY NEWTON LITTLE, On 3/11/94, Page 2

LITTLE advised that on one occasion he picked up some personal computers and documents from the Governor's mansion and took them to VINCENT FOSTER and WILLIAM KENNEDY. LITTLE advised that he did not know to what the documents pertained.

LITTLE stated that HILLARY CLINTON was leaving the firm when he first started working there. He stated that he likes what the CLINTONS are trying to do for the country and, therefore, does not follow reports about WHITEWATER. LITTLE further stated that he does not believe that any attorney at the ROSE LAW FIRM would send WHITEWATER or FOSTER documents to be shredded by a courier. He further stated that he only saw good things at the firm, everyone was very open, and that the firm even went as far as telling employees not to buy stock in companies for whom they were working due to potential conflicts.

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription 3/21/94

L. JEAN LEWIS, also known as JEAN LEWIS, Senior Criminal Investigator, RESOLUTION TRUST CORPORATION (RTC), Kansas City Office, Kansas City, Missouri, business telephone number (816) 968-7237, was interviewed in the offices of the Office of the Independent Counsel, Little Rock, Arkansas, wherein, at the outset, LEWIS was informed of the identities of the individuals conducting this interview, who identified themselves as PATRICK SMITH and JULIE O'SULLIVAN, Deputy Independent Counsels, and [redacted] Special Agent (SA), Federal Bureau of Investigation (FBI).

Thereafter, LEWIS provided the following information voluntarily:

She first became employed for the RTC in about July, 1991, at the Tulsa, Oklahoma, Field Office as secretary to the Data Processing Department. She was previously employed at a savings and loan association in Dallas, Texas, and previous to that, in about 1982, she was employed at COMMONWEALTH SAVINGS AND LOAN, Houston, Texas, although her college major was in Political Science.

In February, 1986, she was employed at WESTERN SAVINGS AND LOAN, Dallas, Texas, as Executive Assistant to the Chief Financial Officer, BOB DAWSON; however, within about six weeks of her working for DAWSON, DAWSON was fired by JERRY WOODS. Thereafter, JON BOYLE became Executive Vice President for about five weeks. WESTERN SAVINGS was experiencing extreme financial difficulties during this time and were being watched very closely by regulators, and, upon the departure of BOYLE, LEWIS was assigned as a Loan Administrator and placed in charge of reviewing, servicing, and mending those loan files wherein problems had been identified or had surfaced.

An audit was commenced, which occurred from about May through September 1986, and LEWIS had previously decided that she was going to leave on the 91st day from the date in February that

orig - Sub A Copy - Sub A  
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11 - 11 - 8

Investigation on 3/14/94 at Little Rock, Arkansas File # 29D-LR-35063 Subs 5,7,8,9,10,11 &12  
by SA [redacted] Date dictated 3/18/94

29D-LR-35063

Continuation of FD-302 of L. JEAN LEWIS, On 3/14/94, Page 2

she had first become employed at WESTERN SAVINGS had that agency not found a job for her as Loan Administrator.

The audit lasted from May through September, 1986, and LEWIS intended to terminate her employment at 1:00 p.m. on September 12, 1986; however, on that day, her boss said to her, "Hold on one more day because the regulators are taking us over this afternoon."

The following Monday, the FEDERAL SAVINGS AND LOAN INSURANCE CORPORATION (FSLIC) did, in fact, take over that savings and loan, and the following Monday is when that institution actually became WESTERN FEDERAL SAVINGS AND LOAN. As a result of the failure of this savings and loan, several employees were thereafter indicted by a Federal Grand Jury.

LEWIS explained that, when a savings and loan association is "taken down," the division of the RTC that performs that function is the OFFICE OF THRIFT SUPERVISION (OTS), and the other division of RTC, which is made up of the remaining components of the previous FSLIC and the FEDERAL HOME LOAN BANK BOARD (FHLBB), were combined into an agency known as the SAVINGS ASSOCIATION INSURANCE FUND (SAIF), and SAIF is the separate insuring agency for savings and loan associations.

After LEWIS became employed by the RTC at the Tulsa Field Division Office, she subsequently became an investigator and eventually a senior investigator, but, at that time, as an investigator, was responsible for investigations of savings and loans in Arkansas while CLARK WALTON was responsible for such investigations in Oklahoma.

Normally when a savings and loan association is taken over by RTC, the 20 "top" problem loans are seized for investigation, and all other records pertaining to that savings and loan are seized along with all documentation and forwarded to the RTC Kansas City Regional Office where such documents are examined by the Civil Division, as well as the Criminal Division, which divisions are separate. Also, when a particular savings and loan is "taken down," an inventory of the various documentation is conducted on a "by file" basis.

29D-LR-35063

Continuation of FD-302 of L. JEAN LEWIS, On 3/14/94, Page 3

With reference to MADISON GUARANTY SAVINGS AND LOAN (MGS&L), that institution was placed under FHLBB in about July, 1986, and JEFFERY GERRISH of the firm BORAD & HUGGINS, did his "by file" inventory in about 1986 or 1987, and, thereafter, MGS&L was "taken down" in 1989. There was no criminal investigation on MGS&L previous to LEWIS initiating same, which action was not a monetary decision and which action was initiated following the acquittal of JAMES B. MC DOUGAL in U.S. District Court at Little Rock, Arkansas.

At that time, CHUCK WALTON, as previously noted herein, was the criminal coordinator for Oklahoma and was LEWIS' immediate supervisor.

Additionally, two other RTC employees, identified as RICHARD IORIO, a Field Investigations Officer, and MIKE VAN VALKENBURG, had input with reference to MGS&L being targeted by LEWIS for December, 1992.

Previous thereto, in about March, 1992, an article appeared with reference to the WHITEWATER DEVELOPMENT controversy in the "New York Times" newspaper connecting MGS&L and WHITEWATER (WW).

Actually, the original request for the investigation of MGS&L came from JOHN WALKER, an RTC Deputy Counsel, and ALLAN CORBETT through VIRGINIA LEWIS, who was then Director of the Tulsa RTC Field Office.

CHUCK WALTON's request for such an investigation had gone "two ways." One was back to the Kansas City Regional RTC Office and to the Tulsa Field Office.

At about that time, MARK VAN VALKENBURG was "back in town" and asked for a confidential talk" with LEWIS wherein VAN VALKENBURG stated, "I think we have a problem with MGS&L," and "Go check it out."

At that time and through the present, JEAN LEWIS has had a good relationship with the United States Attorney's Office and the FBI at Little Rock, Arkansas.

29D-LR-35063

Continuation of FD-302 of L. JEAN LEWIS, On 3/14/94, Page 4

What LEWIS remembers VAN VALKENBURG as saying was, "JEAN, we have a problem. PAT HERITAGE of the ROSE LAW FIRM allegedly fabricated two or three years worth of Board of Directors minutes for MADISON FINANCIAL CORPORATION while she was at MGS&L."

This information apparently came from an interview that GERRISH had previously conducted with HERITAGE.

Also, while HERITAGE was working at MGS&L, she obtained a J.D. law degree in about 1990 wherein, upon obtaining such a degree, HERITAGE immediately terminated her employment at MGS&L, and she was immediately employed at the ROSE LAW FIRM.

It appeared to LEWIS that "BORAD & HUGGINS seemed to know this long before MIKE VAN VALKENBURG advised LEWIS of PAT HERITAGE's interview."

In about March, 1992, WYATT ADAMS, an associate of LEWIS, and LEWIS were directed to Little Rock where, in about April, 1992, they met with FBI SA GARY A. AARON and KENNETH STOLL and SANDRA CHERRY, both Assistant United States Attorneys, who had prosecuted JAMES B. MC DOUGAL, which had resulted in the acquittal. It is LEWIS' understanding that prosecution "couldn't prove where the money went," and the jury, during deliberations, deadlocked with six voting for conviction and six voting for acquittal; however, the jury eventually reached a unanimous verdict of not guilty.

While in Little Rock in about April, 1992, ADAMS and LEWIS "spent three hot weeks" in late April or early May in an unventilated warehouse that had no air conditioning and was dimly lit, which warehouse contained certain of the seized records of MGS&L, which had been seized by the RTC in about 1989. While examining such records, WYATT ADAMS discovered a binder containing a stack, perhaps four or five inches thick, of demand deposits, commonly known as "force pays." LEWIS noted that it is her experience such "force pays" from a demand deposit account in a financial institution is normally about 99% fraudulent, and it is her expectation that such is the case with respect to MGS&L. ADAMS also found certain of the demand deposits or "force pays" to be for WW. ADAMS also found five pages of green ledger sheets pertaining to Maple Creek Farms wherein WW was listed as reserve for the Maple Creek Farms development.

29D-LR-35063

Continuation of FD-302 of L. JEAN LEWIS, On 3/14/94, Page 5

LEWIS is actually the person who found the "reserve for development" scheduled for payment in October, 1985, and WYATT ADAMS found the corresponding demand deposit items.

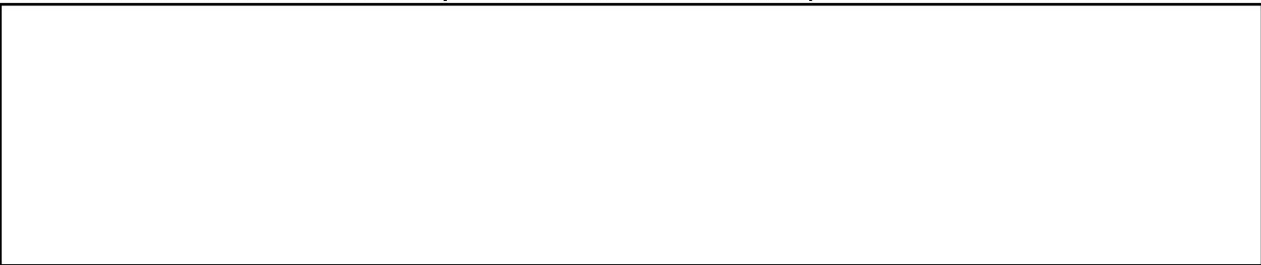
It was obvious to LEWIS, from PAT HERITAGE's admissions to JEFFERY GERRISH, and from examining the minutes and balance sheets found in the MGS&L records, that these minutes and balance sheets were "cooked," interpreted by LEWIS to mean fabricated.

LEWIS also found money going out of these various development fund accounts into personal accounts, and such funds were usually deposited into the personal accounts in a range from approximately \$1,500 to \$3,500 each.

At the time, LEWIS identified 12 separate accounts which had received funds from the direct deposit account as "force pays," and these occurred during 1985 and 1986.

In about May, 1992, when LEWIS returned to Tulsa from examining the records in the warehouse, as previously noted herein, the Tulsa office "was being shut down," and LEWIS was detailed to Kansas City.

With reference to the minutes of the Board of Directors and the balance sheets being fabricated, LEWIS acknowledged that records of proof machines, as maintained in federally insured financial institutions, "cannot be cooked," and she advised that



LEWIS prepared the transfers from various of the 12 accounts previously mentioned herein and others with a massive "check kite" and noted that the reason there was never a "bust out" as the float kept becoming larger and larger is because the float from the various affected accounts was transferred to the demand deposit account through the "force pays."

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

29D-LR-35063

Continuation of FD-302 of L. JEAN LEWIS, On 3/14/94, Page 6

LEWIS noted that this was the case with regard to practically all, if not all, of the nine criminal referrals sent to the FBI via RTC letters dated October 8, 1993, and LEWIS expressed the view that most of these referrals are interrelated.

LEWIS characterized the transfers of funds from among these accounts ranging from \$1,500 to \$3,500 as merely a contrivance designed to deceive examiners and regulators as to the true financial soundness of the institution as was evident when MGS&L became insolvent.



FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription

3/21/94

FOIA(b)(6)

DONALD DUPREE/BLAIR, JR. (white male born [redacted] was interviewed at the Little Rock Headquarters of the Federal Bureau of Investigation (FBI) by Special Agents [redacted] FBI. Mr. BLAIR was advised that this interview concerned the allegation that "Whitewater" documents were destroyed by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

Mr. BLAIR advised his present home address is 140 Valley Club Circle, Little Rock, Arkansas 72212, telephone number (501) 227-8863 or 227-4915. He stated that he is a full-time student (senior) at the University of Tennessee (UT), Knoxville, Tennessee, where he is majoring in political science and business. He advised he will graduate in May 1994. He stated his university address is 509 11th Place, Apartment 4001, Knoxville, Tennessee 37916, telephone number (615) 546-5213. He stated he is presently unemployed.

Mr. BLAIR advised he was employed as a courier by the ROSE LAW FIRM from July 6, 1992, until mid-August 1992. He stated he was at the Firm for no more than five or six weeks. He stated that, as a courier, his duties included, but were not limited to, transporting files, mail, etc., and shredding files and documents. He advised that he usually worked from 8:00 a.m. to 5:00 p.m., Monday through Friday.

Mr. BLAIR advised he got his job with the Firm because he and his family were close friends of VINCENT FOSTER, JR., and his family. He stated that he had expressed an interest in becoming a lawyer, to Mr. FOSTER and Mr. FOSTER had suggested that he (BLAIR) work with him (FOSTER) during the summer of 1992. He advised that since Mr. FOSTER was so heavily involved with the CLINTON's Presidential campaign that summer, he (BLAIR) was not able to work with Mr. FOSTER and spent those five or six weeks working as a courier.

cc, copy - MWA  
copy - Sub H  
copy - SUB A

SEARCHED \_\_\_\_\_ INDEXED \_\_\_\_\_  
SERIALIZED la FILED la  
MAR 21 1994  
FBI - LITTLE ROCK

Investigation on 3/21/94 at Little Rock, Arkansas File # 29D-LR-35063

SA [redacted]  
by SA [redacted]

29D-LR-35063

Continuation of FD-302 of DONALD DUPREE BLAIR, JR., On 3/21/94, Page 2

Mr. BLAIR advised that the Firm had only one shredding machine and that it was the couriers responsibility to shred material picked up from the various offices in the building. He stated that there were days when it seemed like shredding was going on all day long. He stated that no courier was assigned to shred more than two hours at a time. He advised that he cannot recall anything about any of the shredding he did.

Mr. BLAIR advised that on three or four occasions he made trips to the Firm's remote storage facility. He stated that the door was always locked and he was admitted by one of the women who worked there. He stated he believes they were always called in advance when a courier was on the way out there. He stated he never saw any shredding at the remote storage facility nor did he ever see a uniformed guard there. He stated he is unaware of any commercial shredding having been done at the remote storage facility while he worked for the ROSE LAW FIRM.

Mr. BLAIR advised he cannot recall specifically shredding anything he knew to have been associated with any of the following:

VINCENT FOSTER, JR.  
BILL CLINTON  
HILLARY CLINTON  
WHITEWATER DEVELOPMENT  
MADISON GUARANTY SAVINGS & LOAN  
JIM GUY TUCKER  
DAVID HALE

Mr. BLAIR advised he is aware of the allegations concerning the shredding of a box of Mr. FOSTER's files, which allegations have appeared in the newspaper recently. He stated he has no personal knowledge of any such shredding as alleged by the news media.

Mr. BLAIR advised he has not been contacted by either anyone from the ROSE LAW FIRM or any representative of the news media.

Mr. BLAIR advised that, now that he is fully aware of the Government's interest in this matter, he will report any information which he may receive from any source which he believes might be of interest to the Independent Counsel.

29D-LR-35063

Continuation of FD-302 of DONALD DUPREE BLAIR, JR., On 3/21/94, Page 3

Mr. BLAIR provided the following information:

|        |                          |
|--------|--------------------------|
| Name   | DONALD DUPREE BLAIR, JR. |
| Race   | White                    |
| Sex    | Male                     |
| DOB    |                          |
| POB    |                          |
| SSAN   |                          |
| Height | 6'2"                     |
| Weight | 180 pounds               |
| Hair   | Brown                    |
| Eyes   | Brown                    |

FOIA(b)(6)

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription 3/15/94

JASON ERIC FORD, white male, date of birth [redacted] [redacted] Social Security Account Number [redacted] was contacted at his residence located at 801 South Rodney Parham Road, Unit 35C, Little Rock, Arkansas. FORD was advised of the identity of the interviewing Agent and the nature of the interview. He then provided the following information:



FORD was employed as a courier for the ROSE LAW FIRM in Little Rock from February 1, 1992, through September 30, 1992. FORD's father, ROGER FORD, was employed as the City Manager for Texarkana and contacted LES BALDAGE, Attorney for the ROSE LAW FIRM, regarding potential employment for his son. JASON FORD contacted MARY RUSSELL, an administrative manager for the ROSE LAW FIRM, who eventually hired FORD. FORD is currently attending college and is employed on a part-time basis with COMMON CAUSE.

FORD advised that his duties as a courier consisted of running errands and anything else requested by an attorney or secretary of the law firm. Couriers were not usually allowed into an attorney's office at any time until the ROSE LAW FIRM began shredding documents. FORD recalled that the ROSE LAW FIRM did not have a shredder until the "trash bin incident." FORD advised that a "Washington Post" reporter was found rummaging through the ROSE LAW FIRM trash bin, which caused the firm to purchase a shredder to destroy documents and protect client confidentiality. FORD advised that each attorney's office and secretary had two garbage cans, one for confidential trash and another for regular trash. The confidential trash bins were picked up by the couriers on a daily basis, taken down to the basement of the ROSE LAW FIRM, and shredded. FORD advised that the shredding began during the summer of 1992. FORD had shred documents while he was employed with the ROSE LAW FIRM, but he indicated he was not assigned to shred documents for any specific attorney or secretary. All the couriers spent time shredding documents on a daily basis.

cc Copy - Sub B  
Copy - Sub B

FOIA(b)(7) - (C)

29D-LR-35063-Sub B-59

Investigation on 3/14/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 14

by SA [redacted] Date dictated 3/15/94  
FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 124

Handwritten signature/initials.

29D-LR-35063 Sub 11

Continuation of FD-302 of JASON ERIC FORD, On 3/14/94, Page 2

FORD advised that on one occasion he and some other couriers were told by RUSSELL to go to REMOTE STORAGE to pick up several boxes of documents and bring them back to the ROSE LAW FIRM. FORD advised that RICKY (Last Name Unknown) was employed by REMOTE STORAGE and had the boxes waiting for the couriers when they arrived. FORD could not recall what documents were contained in the boxes that were picked up but believed they were all dated in the 1990s.

FORD advised that he was unaware of any boxes maintained in the basement beneath the stairwell at the ROSE LAW FIRM.

In approximately September, 1992, FORD recalled two occasions where RUSSELL had him travel to the Governor's mansion to pick up legal documents from HILLARY CLINTON, who performed most of her legal duties at the mansion instead of at the law firm. On both occasions, Mrs. CLINTON handed FORD a large envelope sealed and stamped "Confidential," which was to be returned to Mrs. CLINTON's secretary, MILLIE AUSTIN. Upon returning to the ROSE LAW FIRM, AUSTIN advised FORD to shred the documents contained in the envelope without unsealing the envelope. FORD recalled that another courier, JEFF MARROW, also performed similar duties of traveling to the Governor's mansion to pick up documents from Mrs. CLINTON.

FORD advised that he never reviewed any legal files or documents that he was instructed to shred because he was not interested in the contents of the documents being destroyed.

FORD advised that in February, 1993, he was contacted by STEVEN ENGLEBERG of the "New York Times" regarding an interview concerning his employment with the ROSE LAW FIRM. FORD advised that he informed ENGLEBERG of the same information as he has discussed during this interview. FORD advised that he has not been contacted by any other reporters nor anyone from the ROSE LAW FIRM since his resignation in September, 1992.

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7)-(C)

FOIA(b)(6)

Date of transcription

3/17/94

BRUCE DOUGLAS ANIBLE, white male, date of birth [redacted] was interviewed at the Little Rock Office of the Federal Bureau of Investigation by Special Agent [redacted]. ANIBLE was advised that this interview concerned the allegation that "Whitewater" documents were destroyed by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

2

ANIBLE stated that he went to work for the ROSE LAW FIRM as a courier in October 1991 and left the employment in February of 1992. He advised that he was attending the University of Arkansas at Little Rock at the time. He stated that, during his time of employment with the firm, he was not aware of there being a paper shredder at ROSE LAW FIRM. He stated that he went into the supply room, in which BOB BOUCHER kept his equipment, and he did not see a shredder in that room. He advised that he knows of no couriers at the time of his employment who were involved in any shredding. He stated that he did take boxes of files to the remote storage facility on Cantrell Road, but there was no uniformed guard, and there was no paper shredder there.

He advised that his duties as a courier involving the mail in the office was to handle the incoming and outgoing mail. He advised that they had a cart with the attorneys' names on different slots and that the mail was put into those slots and delivered to the attorneys, and, whatever mail was to go out of the firm, was placed in those attorneys' slots and taken from their offices. He advised that he did not pick up any trash during his employment at the ROSE LAW FIRM from the offices of the attorneys. He assumed that the janitorial crew, which was a night crew, did the cleaning up and the handling of trash. He advised that MARY RUSSELL, who was his supervisor, would inform the couriers when they were to pick up a box of files to take to the remote storage facility and that they would go to the attorney's office, obtain the box of files from the secretary, and remove it to the storage facility. He advised that he would use his own car in transporting the boxes of files and that, when he got to the remote storage facility, the lady who was in charge

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Copy - Sub B

29D-LR-35063-Sub 11-54

Investigation on 3/15/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 11

by SA [redacted] Date dictated 3/17/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 126

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29D-LR-35063 Sub 11

Continuation of FD-302 of BRUCE DOUGLAS ANIBLE, On 3/15/94, Page 2

of the facility would unlock the door, and they would put the boxes of files in the facility. He advised that he worked on Tuesdays and Thursdays from 8:00 a.m. to 11:30 p.m. and on Fridays from 12:00 noon to 5:00 p.m. He advised there was some variances in the times, for example, during spring break or on holidays, but that usually those were the times that he worked at the firm.

ANIBLE stated that he has no firsthand knowledge of any shredding of the following listed individuals' files: VINCENT FOSTER, JR.; BILL CLINTON; HILLARY CLINTON; WHITEWATER DEVELOPMENT; MADISON GUARANTY SAVINGS AND LOAN; JIM GUY TUCKER; DAVID HALE.

ANIBLE advised that he would report any information that he may receive from any source which he believes might be of interest to the Independent Counsel regarding the Government's interest in this matter.

The following is a physical description of BRUCE DOUGLAS ANIBLE:

|                                       |  |
|---------------------------------------|--|
| <u>Race</u>                           | White  |
| <u>Sex</u>                            | Male   |
| <u>Date of Birth</u>                  | [Redacted]   |
| <u>Place of Birth</u>                 |  |
| <u>Social Security Account Number</u> |  |
| <u>Residence</u>                      |  |
| <u>Telephone</u>                      | 29 South 10th Street,<br>Cabot, Arkansas 72023<br>(501) 843-6412                                       |
| <u>Parents</u>                        | DONALD and HARLU ANIBLE,<br>29 South 10th Street,<br>Cabot, Arkansas 72023<br>Telephone (501) 843-6412 |
| <u>Education</u>                      | Presently a senior at the<br>University of Arkansas at<br>Little Rock                                  |

FOIA(b)(6)

- 1 -

## FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription

3/15/94

WILLIAM ERIC TOWNSEND, white male, date of birth [redacted] place of birth [redacted] Social Security Account Number [redacted] who is presently a senior at the University of Arkansas at Little Rock majoring in Speech Communications and who resides at 3802 Kavanaugh, Apartment Number 518, Little Rock, Arkansas 72205, residence telephone number (501) 280-0639, was advised at the outset of the identities of the interviewing Agents and of the nature of the investigation being conducted at which time he provided the following information voluntarily:

TOWNSEND was employed as a courier at the ROSE LAW FIRM from about September 1990 until January 15, 1992. During that time, TOWNSEND was living with MICHAEL DEJARNETT, a co-worker who was also a courier at the ROSE LAW FIRM.

TOWNSEND and DEJARNETT are both from Pine Bluff, Arkansas, and had been classmates at the Pine Bluff High School. DEJARNETT's mother had a friend who was a secretary for one of the attorneys at the ROSE LAW FIRM, and DEJARNETT got a job at the law firm first and then TOWNSEND obtained employment there.

DEJARNETT had worked for about one month at the ROSE LAW FIRM previous to TOWNSEND obtaining similar employment.

TOWNSEND has never been contacted by the media with reference to his previous employment at the ROSE LAW FIRM concerning the WHITEWATER investigation or any other matter.

TOWNSEND, within the past two or three days, has seen two alleged former couriers at the ROSE LAW FIRM on the national news media, but TOWNSEND did not work at the ROSE LAW FIRM when these two individuals did, but it is TOWNSEND's recollection that he did meet one of them, name not recalled, at TOWNSEND's and DEJARNETT's apartment approximately one and a half years ago. TOWNSEND was a courier throughout his tenure at the ROSE LAW FIRM. There were about 10 couriers employed there when TOWNSEND was there. TOWNSEND's duties, as well as those of the other

cc: OLS - Sub A

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FOIA(b)(7) - (C)

Investigation on 3/10/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 11by SA [redacted]  
SA [redacted]Date dictated 3/11/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 128



29D-LR-35063 Sub 11

Continuation of FD-302 of WILLIAM ERIC TOWNSEND, On 3/10/94, Page 2

couriers, included the delivery and filing of documents at both the Federal and county courthouses, receiving Federal Express mail and dispatching same, attorney deliveries, airport pick-ups, but TOWNSEND has never shredded anything at the ROSE LAW FIRM and does not recall a shredder ever being present.

TOWNSEND advised he was paid \$4.25 per hour plus \$.20 per mile, and practically all of his courier deliveries and pick-ups were within the Little Rock-Pulaski County area, except on rare occasions when he would go out of town to file papers in courts at El Dorado, Arkansas, or other locations within the state.

MARY HELEN RUSSELL was the person who actually hired TOWNSEND and was his immediate supervisor throughout his tenure at the ROSE LAW FIRM.

TOWNSEND originally had not intended to work while attending school but decided he needed the extra money. TOWNSEND left the ROSE LAW FIRM employment of his own volition because his car, a 1985 Dodge Daytona, silver in color, two-door, was becoming worn out. TOWNSEND left on good terms and had provided the necessary two weeks notice, which makes him eligible for rehire. TOWNSEND worked approximately 20 to 25 hours per week and normally would work from four to six hours each weekday, usually from about 1:00 to 6:00 p.m. TOWNSEND noted that RUSSELL was always very accommodating with the couriers who were college students in arranging their hours so as to not conflict with their studies.

TOWNSEND estimates that there were times when he would make as many as 15 trips per day to the remote storage facility located on Cantrell Road near CAJUN'S WHARF to either pick up or drop off attorney files; however, he was never involved in such files' destruction, specifically shredding.

The only time that there was an incident wherein employees may have become disgruntled occurred when an attorney named RICK MASSEY fired a courier who had been employed continuously for approximately three years. The name of this courier is JOHN PHILLIPS, and PHILLIPS was fired by MASSEY when PHILLIPS apparently failed to make a timely delivery after dark even though PHILLIPS had "logged it off" on his courier records. It may have been that JOHN PHILLIPS had already left for the day,

29D-LR-35063 Sub 11

Continuation of FD-302 of WILLIAM ERIC TOWNSEND, On 3/10/94, Page 3

and the following day PHILLIPS may have logged the delivery as having been made the previous day when PHILLIPS did not make the delivery until the succeeding day.

JERRY BELL, a black male, and SHAWN PEEL are recalled by TOWNSEND to have been present when MASSEY fired PHILLIPS.

The only attorneys with whom TOWNSEND had direct contact were those who played on a ROSE LAW FIRM basketball team, and those attorneys are identified as SAMMY STRANGE, MARK PEOPLES, and JEFF GEARHEART, it being noted that GEARHEART was the team coach. Also, TOWNSEND had direct contact with another attorney named WILSON JONES in that TOWNSEND did "house sitting" and yard work for JONES.

TOWNSEND advised that PHILLIPS, after being fired by MASSEY, obtained employment as manager of a U.S. PIZZA COMPANY outlet in the Little Rock area.

Except for those persons previously mentioned herein, TOWNSEND is unaware of the identities of any other persons, i.e. current or former ROSE LAW FIRM employees, who may be providing information to the media.

As noted, TOWNSEND never destroyed or shredded any documents or files while employed at the ROSE LAW FIRM.

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

Date of transcription

3/15/94

RANDALL PAUL COX, also known as RANDY, white male, date of birth [redacted] place of birth [redacted] Social Security Account Number [redacted] Apartment D-2, Ridgeway Apartments, 601 Ridgeway Street, Little Rock, Arkansas 72205, residence telephone number (501) 664-6052, was advised at the outset of the identity of the interviewing Agents and of the nature of the investigation being conducted at which time he provided the following information voluntarily:

*(Handwritten mark: a circle with an X and the initials 'CJF')*

He is single and has two years of college at the University of Arkansas at Little Rock where he last attended in May 1993. He was employed at the ROSE LAW FIRM from April 1990 through December 1993. For the first one and a half years, he was a courier, and thereafter he was in charge of the mail. As such, he would pick up the mail at the post office at about 6:30 a.m. and deliver it to the ROSE LAW FIRM. Upon return to the law firm, he would separate the mail and distribute it to the incoming mailboxes of the secretaries for each of the attorneys employed by the firm.

Thereafter, each hour during the day, he would pick up outgoing mail from the outgoing mailboxes of each secretary for each attorney in the law firm, and, except for the initial delivery of mail each morning to the various secretaries' incoming boxes, Mr. COX did not use a mail cart, rather he would simply go by each secretary's outgoing box and place their mail in a standard bank type box and would then return to his duty station in the basement and sort the mail for delivery. Then various couriers would take the mail to the post office and would normally leave the law firm at about 5:45 p.m. en route to the post office in that the mail had to be at the post office by 6:00 p.m.

It is noted that, after being a courier for the first one and a half years of his employment at the ROSE LAW FIRM, COX then became the mail clerk, but, while performing those duties, he occasionally would make emergency courier deliveries,

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*29D-LR-35063 Sub 11-52*

Investigation on 3/10/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 11

by SA [redacted] Date dictated 3/11/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 131

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29D-LR-35063 Sub 11

Continuation of FD-302 of RANDALL PAUL COX, On 3/10/94, Page 2

particularly during the noon hour or when no one else was available to do it.

MARY HELEN RUSSELL hired COX and was his immediate supervisor throughout his tenure until RUSSELL left about two or three months prior to COX terminating his employment at the law firm. It is COX's best recollection that RUSSELL was last employed about August 1993.

COX noted that it was the individual courier's duty to shred documents as they were picked up from the various trash receptacles designated for shredding at each of the firm's secretaries' desks once they were returned to the shredding room. Each courier had an "assignment pocket" in the courier's room in the basement of the ROSE LAW FIRM, and RUSSELL would place assignment cards in the various couriers' "assignment pockets" wherein a particular courier was given a specific floor assignment where he was to pick up those documents to be shredded from the shredder waste cans by each secretary on each floor. COX never picked up any documents for shredding; however, if certain couriers, upon arrival at the shredding room, did not shred their assigned documents immediately as should have been done, COX, because of boredom from his working crossword puzzles and reading newspapers, would shred documents for certain of the couriers in order to "break the boredom." Also, COX would transport various boxes containing attorney files to the remote storage facility; however, most such transports by COX were in large volume, consisting of perhaps 25 or 30 boxes at a time, which would be done on a Saturday by COX, acting alone, in a borrowed pickup truck. COX recalls that most of the large volume of boxes transported by him to remote storage were those regarding a major case that the law firm had handled involving "PRECISION INDUSTRIES."

COX was paid \$5 per hour throughout most of his tenure for 10-hour workdays except when COX would assist BOB BOUCHER in building shelves or performing similar storage tasks at the remote storage facility, then he would be paid \$8 per hour.

COX estimates that, at one time in perhaps the summer of 1992, there may have been as many as 15 couriers employed at this firm at one time; however, that number was reduced inasmuch as these individuals "were taking up all the parking."

29D-LR-35063 Sub 11

Continuation of FD-302 of RANDALL PAUL COX, On 3/10/94, Page 3

COX noted that the only current or former ROSE LAW FIRM employees of whom he is aware who have been talking to the media are JEREMY HEDGES, CLAYTON LINDSEY, and CHRIS CORDERO.

COX noted that COX does not believe the information that these individuals are providing to the media and specifically pointed out that HEDGES very rarely ever shredded any files in that HEDGES appeared to COX to have an extreme dislike for that portion of his duties.

COX stated that, except for information in the media, COX does not have any knowledge regarding the possible destruction of any files pertaining to those matters pertaining to the ROSE LAW FIRM.

COX noted that he left his employment at the ROSE LAW FIRM of his own volition for a better paying job and was eligible for rehire and noted that he is still permitted to utilize the exercise room in the basement of the law firm.

COX also stated that he did not think that any couriers were provided with any files from the ROSE LAW FIRM to destroy, which might be the focus of the investigation of the Office of the Independent Counsel, and stated, "Do you think people as smart as these guys that are allegedly involved would send such files to couriers to shred for them?"

COX continued to discredit those couriers currently speaking to the news media, as previously mentioned herein, in particular HEDGES, in that COX said, "You could hardly get HEDGES to go in and shred anything."

COX noted that the documents to be shredded each day were carried to the shredder from each floor in bankers' boxes and noted that the specific pocket card assignments would be for "One Old, Two Old, Three Old, One New," or "Two New," which referred to the various floors of the old and new buildings comprising the ROSE LAW FIRM.

COX noted that, since his terminating his employment at the ROSE LAW FIRM on December 15, 1993, he has been in telephonic contact with three different attorneys of that firm but would not identify these attorneys or the reasons for these contacts, noting that "these guys are friends of mine," the only exception

29D-LR-35063 Sub 11

Continuation of FD-302 of RANDALL PAUL COX, On 3/10/94, Page 4

being that, within the past three or four weeks while COX was still living at his previous address of 7405 Marcia, Little Rock, telephone number (501) 562-8840, COX received a telephone message from a female caller asking that COX return her call, and, at that time, COX, prior to returning that call, did telephonically contact an attorney at the ROSE LAW FIRM to seek advice at which time this attorney advised COX that the caller might perhaps be a representative of the news media, and that, although it was up to COX to make such decisions, the attorney noted that, in the event this person was a representative of the news media and COX did not return her call, that COX might be inviting the media to begin following him around and disrupting his activities.

This attorney also told COX that COX could speak to anyone he wished regarding his former employment at the ROSE LAW FIRM and mentioned to COX that COX might be contacted in the near future by someone from the Federal Bureau of Investigation or the Office of the Independent Counsel and suggested that, in the event of such an occurrence, that COX should go ahead and talk to such individuals and "tell them the truth."

Thereafter, COX did not immediately return the call from the female caller, but, since COX became concerned that it might be a notification that he had won something from the Readers Digest Sweepstakes, he then telephonically contacted that female and learned that she was a representative of a collection agency, and this call occurred prior to COX moving from 7405 Marcia to his current residence during the weekend of March 5, 1994.

COX stated he is not aware of any disgruntled or dissatisfied current or former employees at the ROSE LAW FIRM.

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

FOIA(b)(6)

Date of transcription 3/11/94

MARY HELEN RUSSELL, white female, date of birth [redacted] place of birth [redacted] Social Security Account Number (SSAN) [redacted] who resides at 808 North Jackson Street, Little Rock, Arkansas 72205, listed residence telephone number (501) 663-5874, voluntarily appeared with her attorneys, WALTER B. STUART IV and C. MICHAEL BUXTON, VINSON AND ELKINS LLP, The Willard Office Building, 1455 Pennsylvania Avenue Northwest, Washington, D. C. 20004-1008, office telephone number (202) 639-6571, office fax telephone number (202) 639-6604, at the Office of the Independent Counsel, Little Rock, Arkansas, wherein, at the outset, RUSSELL was informed of the identities of the individuals conducting this interview who identified themselves as PATRICK SMITH, a Deputy Independent Counsel, and [redacted] Special Agent (SA), Federal Bureau of Investigation (FBI).

Thereafter, RUSSELL provided the following information voluntarily:

On March 7, 1994, RUSSELL opened a new business which is known as the CARD SHOP located at 2909 Kavanaugh Street, Little Rock, Arkansas.

RUSSELL was previously employed at the ROSE LAW FIRM, Little Rock, Arkansas, from 1982 until September 30, 1993. She was first employed there part time and made courier assignments and performed other duties as assigned to her by her immediate supervisor identified as CAROLYN HUBER who at that time had the title of office supervisor and later had the title of office administrator.

During the early years of RUSSELL's employment at this firm, closed or pending inactive files were stored either in the basement of the law firm building or at a remote location located at 300 Spring Street in the basement of that building.

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290-LR-35063-Sub 11-51

Investigation on 3/8/94 at Little Rock, Arkansas File # 29D-LR-35063 SUB 11

by SA [redacted] Date dictated 3/8/94  
FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 195

29D-LR-35063 SUB 11

Continuation of FD-302 of

MARY HELEN RUSSELL

, On 3/8/94

, Page 4

were placed in a couriers' assignment box, and, as time permitted each day, the various couriers to whom such tasks were assigned would appear on the various floor of the ROSE LAW FIRM, pick up the trash to be shredded, and return with it to the basement where it would be placed in the room to be shredded. The courier assignment boxes would contain various other assignments, and those of a priority nature had to be accomplished immediately while other such tasks, like picking up the trash to be shredded, would be performed as the various couriers' duties permitted.

However, once the trash to be shredded was brought to the shredding room, it was to be shredded immediately, and "some couriers liked shredding because it permitted them to listen to the commercial radios while others did not like the task of shredding because those persons were more interested in accumulating mileage and would rather be performing courier services outside the building utilizing their automobile." Also, BOUCHER did some shredding as time permitted consistent with his other duties.

With reference to files to be shredded from the remote storage facility, upon the installation of the shredding machine in the basement of the ROSE LAW FIRM, such files would be returned from the remote facility to the shredding room by either the couriers or BOUCHER. ANN WALKER was the employee at the remote facility in charge of microfilming such records, and, once they were microfilmed, either WALKER or RICKI STACEY would then contact RUSSELL and provide a list of the files that should be picked up and shredded. As WALKER would microfilm these files, she would place them in old "Perma File" boxes, and, as such, the files to be destroyed had no connection whatsoever with what may have been written on the outside of such boxes.

This shredding would be accomplished as circumstances dictated, or, "if the couriers became rowdy," RUSSELL would assign shredding to keep them occupied or disciplined.

There were five or six couriers employed when RUSSELL terminated her employment on September 30, 1993.

In addition, there was a "shredder box" situated on each floor of the ROSE LAW FIRM which boxes were kept locked and were maintained with a "drop slot" in the top of each such box, and BOUCHER had the keys to these boxes, and the contents of



29D-LR-35063 SUB 11

Continuation of FD-302 of MARY HELEN RUSSELL, On 3/8/94, Page 5

those boxes would normally be picked up once each week or as they became full.

There were no changes in the shredding policy during the 1992 Presidential Campaign; however, in about 1990 or 1991, while the law firm was considering purchasing their own shredder, which eventually was purchased from CROCKETT BUSINESS MACHINES, there was an incident wherein someone, perhaps news reporters, had sifted through the law firm's trash; however, the law firm, as noted, was already considering the purchase of their own shredder before this incident.

Also there was a short lapse in time, perhaps three or four weeks, between the time that the on-site BFI shredder was last used and the installation of the shredder at the law firm building.

Also, for a very brief time, perhaps two months or less, the law firm used a recycling company that would come to the firm's main building and pick up papers to be shredded and recycled. It is RUSSELL's belief the person owning this company was named NANCY GREEN, and the recycling company was known as the GREEN COMPANY; however, this firm was interested only in picking up the white paper, and, since the ROSE LAW FIRM's daily memos were on pink paper, NANCY GREEN decided that she did not want to continue such pickups which she or her employees usually made in an old white pickup truck.

With reference to the shredding of files at the remote facility, a list of those files proposed for destruction would be prepared and circulated among the attorneys and, when such lists were circulated, RUSSELL would receive some of them back within the two-week time period specified on such a list or memo as the one shown to RUSSELL by Attorney PATRICK SMITH, and, with reference to other attorneys in the firm, RUSSELL would never receive such back from those others.

However, with respect to HILLARY RODHAM CLINTON, RUSSELL recalls that Mrs. CLINTON was the exception in that she always responded promptly and noted Mrs. CLINTON would return such lists to RUSSELL within ten days to two weeks, the time limit specified on the memo itself.

29D-LR-35063 SUB 11

Continuation of FD-302 of MARY HELEN RUSSELL, On 3/8/94, Page 6

Also, with reference to the memo shown to RUSSELL by Attorney SMITH, RUSSELL identified the handwriting at the bottom, i.e. the "D" "K" or "M," as that of Mrs. CLINTON. Also, the "C" appearing on this memo is believed by RUSSELL to be the first initial of one of a number of secretaries that Mrs. CLINTON had, which secretary's first name was CHERYL.

The wordprocessing system utilized at the firm in 1988 was the brand Wang. While utilizing that system, if a list of documents to be destroyed had been typed, then the disk containing such information should have been stored. However, RUSSELL doubts this to be the case in that the firm "had a terrible time" with the Wang disk which they refer to as "platters" because of the various difficulties the firm experienced with the Wang equipment. That equipment, date not recalled, was replaced, and, at that time, an employee named JOHN BROWN, who had previously had the responsibility of overseeing the Wang computer system, "went out with the old Wang equipment."

RUSSELL is not certain whether BROWN ever knew anything about computers, and, during his tenure, if the system went down, it would totally shut down the entire office operation in that there was no backup or independent system that would "kick in."

While the Wang system was in existence, each Thursday, the platters would be removed and placed in empty styrofoam-lined suitcases for storage, and, when this occurred, there were times when the work from the previous week would be "completely wiped out."

Since JOHN BROWN was in charge of the "backup," RUSSELL doubts whether information allegedly stored on the Wang platters is presently retrievable but is of the impression that DONNA COLLINS, a present employee at the law firm, would be the individual most knowledgeable with reference to either a temporary or permanent computer back-up system.

In addition to the codes of M for microfilm, D for Destroy, and K for keep, an additional notation of NB would occasionally be placed on the index cards with reference to the files stored at the remote site location, and this designation meant that a particular file was searched and found to not be in the box.

29D-LR-35063 SUB 11

Continuation of FD-302 of MARY HELEN RUSSELL, On 3/8/94, Page 7

One problem experienced in attempts to retrieve files from boxes stored at the remote site was the fact that "some of the law firm's clerks did not even know the alphabet." With reference to the document, i.e. memo, that was viewed by RUSSELL as displayed by Attorney SMITH, RUSSELL advised that this particular item was done correctly, but RUSSELL advised that, in her opinion, the competence level of RICKI STACEY was very low with respect to STACEY's performing the task of marking her lists consistently correct.

Also, at some point, DONNA COLLINS collated the database for the index cards, but RUSSELL does not know when the computer's database began.

An employee named SUSIE, when she did not have much to do, would be tasked by RUSSELL to enter the data from these index cards into the database, and perhaps as many as 20,000 cards at a time, to include the dates, were implemented.

This database is not widely known in the firm, but KATHY HARRIS, another employee at the ROSE LAW FIRM before RUSSELL left, knew how to access this database because RUSSELL had specifically shown HARRIS how to do so before RUSSELL's departure.

The memo and attachments, previously referred to herein, in RUSSELL's opinion, were together originally because of the "A" number which means to RUSSELL that this attachment was cataloged "early in the game" wherein the main file would have been assigned a peculiar number, and, at the outset, such numbers began with "A," and then there is a peculiar subfile number for succeeding documents, and STACEY is the employee who provides such numbers on these documents.

To RUSSELL's knowledge, Mrs. CLINTON never contacted RUSSELL wherein Mrs. CLINTON requested a "pickup" at the Arkansas Governor's Mansion of any files to be shredded either prior to or subsequent to the fall election of 1992, and the same is true with reference to files maintained by the ROSE LAW FIRM at their remote storage facility.

The only records that RUSSELL is aware of that were shredded with reference to Mrs. CLINTON were those contained in a box designated "children's defense fund," and these records had

29D-LR-35063 SUB 11

Continuation of FD-302 of MARY HELEN RUSSELL, On 3/8/94, Page 8

come from Mrs. CLINTON's office in the law firm and were shredded shortly before Mrs. CLINTON moved to Washington, D. C.

Almost everything that came to the couriers at the ROSE LAW FIRM went through RUSSELL.

With reference to the one box of children's defense fund material, the possibility exists that one of Mrs. CLINTON's secretaries, identified as MILLIE, may have called RUSSELL and said, "I've got a box up here to be shredded."

However, as noted, nothing at the Governor's Mansion, to RUSSELL's knowledge, was ever brought to the ROSE LAW FIRM and shredded.

Also, RUSSELL noted that the couriers would never see the CLINTONS. At the time, Mr. CLINTON was Governor, and Mrs. CLINTON worked at the ROSE LAW FIRM. MILLIE, or anyone of a number of Mrs. CLINTON's secretaries, would tell RUSSELL what instructions to give a particular courier with reference to transporting items or documents to or from the Governor's Office or elsewhere. As such, it would have been next to impossible for anything to come from the Governor's Mansion to the ROSE LAW FIRM to be shredded since the couriers were required to place any items they may have picked up in the ROSE LAW FIRM's interoffice mail, and the only exception to such a policy would be if the items brought to the ROSE LAW FIRM by the couriers were in a heavy box or were bulky items that would not fit within the mail slots.

As noted, although RUSSELL cannot recall whether the children's defense fund records were shredded before or after the November Presidential election in 1992, it is her belief that these records were shredded shortly before Mrs. CLINTON moved to Washington in perhaps about February, 1993.

RUSSELL has no knowledge with reference to any documents being shredded that pertained to JIM GUY TUCKER or WHITEWATER.

RUSSELL never heard of WHITEWATER prior to seeing it in the printed media and does not know whether any other MADISON GUARANTY SAVINGS AND LOAN files were designated for destruction other than those appearing on the memo previously mentioned

29D-LR-35063 SUB 11

Continuation of FD-302 of MARY HELEN RUSSELL, On 3/8/94, Page 9

herein which was exhibited to RUSSELL during this interview by Attorney SMITH.

With reference to the files of VINCE FOSTER, RUSSELL observed that LORRAINE had been working on FOSTER's closed files and was preparing a list of numbers pertaining thereto, and, in so doing, she was working with RICKI STACEY wherein STACEY was trying to get FOSTER's files in alphabetical order. As such, LORRAINE was trying to be sure that all of FOSTER's files had the correct numbers on them, so she had apparently called and asked RICKI for those numbers. No material was destroyed as a result of that process. There were only two occasions when FOSTER actually responded to the request listing those files being considered for destruction. On one occasion, FOSTER advised that he was too busy preparing for a trial, and, on the second occasion, FOSTER went to the remote storage facility and looked at the list of files being considered for destruction where upon FOSTER made mentioned that to review the files then listed would be "like writing an entire epistle," and, as such, FOSTER never responded to requests that certain of his files be reviewed before their destruction. The time that FOSTER went to the remote facility is recorded in a spiral notebook maintained by RUSSELL as having occurred on March 16, 1988.

Apparently, it was a staff meeting conducted by BILL KENNEDY, a former boss and managing partner, which gave FOSTER the idea of his appearing at the remote storage facility to check on his files that were being considered for destruction.

With reference to the spiral notebook previously mentioned herein, RUSSELL would maintain one such notebook for each year; however, there were occasions when, due to the number of entries that she had made in such notebooks, more than one notebook would be required per year.

RUSSELL currently has possession of such notebooks at her residence, and she was requested by Attorney SMITH to continue to maintain such possession and to not dispose of these items.

Additionally, RUSSELL noted there is an entry of April 3, 1990, about Mrs. CLINTON's materials being shredded, but RUSSELL does not relate this entry in her spiral notebook to the

29D-LR-35063 SUB 11

Continuation of FD-302 of MARY HELEN RUSSELL, On 3/8/94, Page 10

documents listed on the memo previously mentioned herein as shown to RUSSELL during this interview by Attorney SMITH.

As RUSSELL recalls it, the last time that a truck appeared at the remote storage facility for on-site shredding was in about 1991 and not 1992 or 1993.

Also, there may have been one occasion wherein a mobile shredder was utilized at the main office of the ROSE LAW FIRM; however, RUSSELL is not certain that this did, in fact, occur or the year in which it may have occurred.

To reiterate, RUSSELL advised no action was taken with reference to the VINCE FOSTER files until after he left for Washington, and no one has ever told RUSSELL to destroy anything on VINCE FOSTER's list. This would include the date of March 16, 1988, forward.

The documents contained on the memo previously mentioned herein is the only time RUSSELL ever recalls the possibility of any of Mrs. CLINTON's files being destroyed except for those relating to the children's defense fund, and RUSSELL noted that MILLIE was in charge of Mrs. CLINTON's files before Mrs. CLINTON's leaving the law firm.

With reference to WEBB HUBBELL, to RUSSELL's knowledge, no shredding has occurred concerning HUBBELL's files after he left the law firm; however, RUSSELL noted that DEBBIE, HUBBELL's secretary, remained at the ROSE LAW FIRM and is presently employed there.

RUSSELL concluded by stating that, except for the incidents previously mentioned herein with reference to Mrs. CLINTON, RUSSELL is unaware of any destruction of documents pertaining to Messrs. FOSTER, HUBBELL, and KENNEDY or Mrs. CLINTON.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/15/94

A. D. EDGERSON, SR. (initials only), 205 South Walnut, Dumas, Arkansas, nonpublished residence telephone number (501) 382-6375, was advised at the outset of the identities of the interviewing Agents and of the nature of the investigation being conducted at which time he provided the following information voluntarily:



He is the father of A. D. EDGERSON, JR., who is presently residing at 4600 Stratton Road, Little Rock, Arkansas. He does not know whether his son has yet had a telephone installed at that residence. His son returned to work at the ROSE LAW FIRM on March 7, 1994, in that approximately two weeks ago, someone at the ROSE LAW FIRM telephonically contacted his son at the A. D. EDGERSON, SR., residence and asked his son to come back to work for them.

Mr. EDGERSON explained that his son has a four-year degree in Computer Science from the University of Arkansas at Little Rock (UALR), having graduated from that institution in May, 1993. Thereafter, on about November 24, 1993, his son moved from Little Rock, Arkansas, back to the A. D. EDGERSON, SR., residence at Dumas in that his son "was not getting enough work hours at the ROSE LAW FIRM and was 'homesick.'"

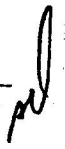
Upon A. D. EDGERSON, JR.'s, return to Dumas, he became employed as a dispatcher for the Dumas Police Department and worked eight-hour days there, but EDGERSON, SR., does not know what hourly compensation his son was paid at the Dumas Police Department or while his son was employed at the ROSE LAW FIRM.

His son drives a 1993 Hyundai, white in color, two-door, which is registered in both EDGERSON, SR.'s, and EDGERSON, JR.'s names. Prior to his son terminating his employment at the ROSE LAW FIRM on about November 24, 1993, his son had worked for the ROSE LAW FIRM as a courier for the preceding two years while his son attended UALR. To EDGERSON, SR.'s, knowledge, his son, prior to receiving the telephone call from the ROSE LAW FIRM representative within approximately two

cc: Orig - Sub 11  
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290-LR-35063-Sub 11-48

Investigation on 3/10/94 at Dumas, Arkansas File # 29D-LR-35063 Sub 11  
by SA [redacted] Date dictated 3/11/94



29D-LR-35063 Sub 11

Continuation of FD-302 of A. D. EDGERSON, SR., On 3/10/94, Page 2

weeks prior to March 7, 1994, had no intentions of returning to that firm as an employee, and EDGERSON, SR., is unaware of the ROSE LAW FIRM's representative's motive in telephonically contacting his son and requesting that his son return to work at that firm.



FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription 3/14/94

FOIA(b)(6)

CHRISTOPHER ANTHONY CORDERO (white male born [redacted] was interviewed at the Little Rock Headquarters of the Federal Bureau of Investigation (FBI) by Special Agents [redacted] FBI. Mr. CORDERO was advised that this interview concerned the allegation that "Whitewater" documents were destroyed by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

Mr. CORDERO advised his present residence address is 9 West Mellwood, Little Rock, Arkansas 72204, telephone number (501) 565-6316. He advised he is presently employed by ZIMMER-HOOTEN, 1300 West Park, Suite 2, Little Rock, Arkansas 72204, telephone number (501) 664-9460.

Mr. CORDERO advised he was employed as a courier by the ROSE LAW FIRM from late October 1990 until mid-July 1993. He stated that, as a courier, his duties included, but were not limited to, transporting files, mail, etc., and shredding files and documents.

Mr. CORDERO advised his recollection is that, prior to about October 1991, the ROSE LAW FIRM put all its trash outside for city garbage collection. He stated the Firm bought a shredding machine about this time (October 1991). He stated that, during a courier's meeting, they (the couriers) were told that a news reporter had been caught going through the Firm's outside trash and, in order to protect the privacy of its clients, the Firm had purchased a shredder.

Mr. CORDERO advised he and other couriers routinely picked up material to be shredded on each floor of the Firm's main office. He stated the couriers would usually pick up trash after lunch each day and either shred it or leave it in the shredder room in the basement.

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| MAR 16 1994         |                |
| FBI - LITTLE ROCK   |                |

Investigation on 3/14/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted]

Date dictated 3/14/94

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29D-LR-35063

Continuation of FD-302 of CHRISTOPHER ANTHONY CORDERO . On 3/14/94 . Page 2

He advised he personally picked up material to be destroyed from the offices of HILLARY CLINTON and VINCENT FOSTER, JR., as well as from the offices of other attorneys at the Firm. Mr. CORDERO advised he does not know what was in any of the boxes he picked up from the attorneys. He advised that frequently he would listen to the radio while he was shredding and did not pay any attention to what he was shredding. He stated that, if a box was still in good shape, it was used again, but, if it was worn out, it was thrown in the trash outside.

Mr. CORDERO advised that, between the 1992 Presidential election and February 1993, he and other couriers made many trips to the offices of the four attorneys going to Washington, D.C. (HILLARY CLINTON, VINCENT FOSTER, JR., WEBB HUBBELL, and WILLIAM KENNEDY). He advised his recollection is that the materials he shredded from Ms. CLINTON and Mr. FOSTER's offices were things that might have come from cleaning out a desk rather than files. He stated that they all seemed to be "personal" things as well as some memos and accounting ledgers. He stated that he has no specific recollection of having shredded anything from Mr. KENNEDY and Mr. HUBBELL.

Mr. CORDERO advised that, when he picked up boxes from the offices of Ms. CLINTON and Mr. FOSTER, the boxes were always from their secretaries or file clerks. He stated that he did not get the material directly from either Ms. CLINTON or Mr. HUBBELL. He stated he assumed these items were probably put into the boxes by their secretaries.

Mr. CORDERO advised he made three or four trips to the Governor's mansion during November 1992. He stated he would deliver small items, such as mail for Ms. CLINTON, to the mansion guard house, and, on two occasions, he would bring boxes of material back to the Firm for destruction. He stated he does not know what was in any of the boxes. He stated he gave these boxes to Ms. CLINTON's secretary, MILLIE AUSTIN.

Mr. CORDERO advised that, one day in November 1992, JEFF MORROW and possibly JASON FORD spent a day at the mansion working for Ms. CLINTON. He stated that all he knows about that is that one of them said they packed boxes, and Ms. CLINTON was in a "bad mood."

29D-LR-35063

Continuation of FD-302 of CHRISTOPHER ANTHONY CORDERO , On 3/14/94 , Page 3

Mr. CORDERO advised he made courier trips to the Firm's remote storage facility. He stated these trips were usually at the direction of a supervisor at the Firm. He stated he never saw a uniformed guard at the remote storage facility, nor did he ever see any shredding taking place at that facility. He stated he is unaware of any commercial shredding having been done at the remote storage facility while he worked for the ROSE LAW FIRM.

Mr. CORDERO advised he cannot recall specifically shredding anything he knew to have been associated with any of the following other than as stated above:

VINCENT FOSTER, JR.  
BILL CLINTON  
HILLARY CLINTON  
WHITEWATER DEVELOPMENT  
MADISON GUARANTY SAVINGS & LOAN  
JIM GUY TUCKER  
DAVID HALE

Mr. CORDERO advised he is aware of the allegations concerning the shredding of a box of Mr. FOSTER's files, which allegations have appeared in the newspaper recently. He stated he has no personal knowledge of any such shredding as alleged by the news media.

Mr. CORDERO advised he has talked to STEPHEN ENGELBERG of the "New York Times" and ALLAN FRANK of "ABC News." He advised his comments to ENGELBERG appeared in a story in the "New York Times" on March 4, 1994.

Mr. CORDERO advised he has not been contacted by anyone in management at the ROSE LAW FIRM.

Mr. CORDERO advised he has talked to a friend, KURT FREEBERG, who is still a courier at the ROSE LAW FIRM. He stated that he was at FREEBERG's residence on or about March 3, 1994. He said that FREEBERG said they were "still shredding -- shouldn't have said that." He stated that FREEBERG would not say any more about it.

29D-LR-35063

Continuation of FD-302 of CHRISTOPHER ANTHONY CORDERO, On 3/14/94, Page 4

Mr. CORDERO advised that, now that he is fully aware of the Government's interest in this matter, he will report any information which he may receive from any source which he believes might be of interest to the Independent Counsel.

Mr. CORDERO provided the following information:

|        |                             |
|--------|-----------------------------|
| Name   | CHRISTOPHER ANTHONY CORDERO |
| Race   | White                       |
| Sex    | Male                        |
| DOB    |                             |
| POB    |                             |
| SSAN   |                             |
| Height | 6'0"                        |
| Weight | 141 pounds                  |
| Build  | Slender                     |
| Hair   | Brown                       |
| Eyes   | Green                       |



FOIA(b)(6)

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription

3/11/94

FOIA(b)(6)

RODERICK ANDERSON BRYAN (white male born [redacted] was interviewed at his residence, 610 South Victory Street, Little Rock, Arkansas 72201, telephone number (501) 372-7200, by Special Agents [redacted] and [redacted] Federal Bureau of Investigation (FBI). He was advised that this interview concerned the alleged shredding of "Whitewater" documents by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

Mr. BRYAN advised that he is currently employed as a waiter at YOUR MAMA'S GOOD FOOD, 2811 Kavanaugh Boulevard, Little Rock, Arkansas 72205, telephone number (501) 663-6333. He advised that at night he plays bass in a band called "Ho Hum."

Mr. BRYAN advised he was employed as a courier for the ROSE LAW FIRM during January and February 1992. He advised his main responsibility as a courier was to make deliveries. He stated he left the ROSE LAW FIRM because he did not like wearing a suit and tie every day.

Mr. BRYAN advised he was never called upon to do any shredding. He stated he does not even recall having ever seen the shredding machine.

Mr. BRYAN advised he recalls making trips to the remote storage facility. He stated these trips were to both deliver and pick up boxes of what he assumed were legal files. He stated that he has no idea what was in any of the boxes he transported. He advised he recalls that MARY RUSSELL would give him a "slip" setting forth instructions as to what he was to do. He stated a woman at the remote storage facility would always see him coming and would open the door for him. He stated he never saw a uniformed guard at the remote storage facility, nor did he ever see a commercial shredding truck there.

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MAR 11 1994

FBI - LITTLE ROCK

Investigation on 3/11/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 3/11/94

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29D-LR-35063

Continuation of FD-302 of RODERICK ANDERSON BRYAN, On 3/11/94, Page 2

Mr. BRYAN advised he made one or two trips to the Governor's mansion and believed he was delivering campaign material. He stated he never brought anything back from the mansion to the ROSE LAW FIRM.

Mr. BRYAN advised he is aware of the allegations concerning the shredding of a box of VINCENT FOSTER's files, which allegations have appeared in the newspaper recently. He stated he has no knowledge of any such shredding. He advised the only courier or former courier with whom he has had any recent contact is JEFF MORROW. He stated that MORROW told him he does not know anything about the alleged shredding, but does not believe the things JEREMY HEDGES has been saying to the news media. He advised that MORROW can be reached at telephone number (501) 663-3161.

Mr. BRYAN advised he has not been contacted by either anyone from the ROSE LAW FIRM or any representative of the news media.

Mr. BRYAN advised that, now that he is fully aware of the Government's interest in this matter, he will report any information which he may receive from any source which he believes might be of interest to the Independent Counsel.

Mr. BRYAN provided the following information:

|        |                         |
|--------|-------------------------|
| Name   | RODERICK ANDERSON BRYAN |
| Race   | White                   |
| Sex    | Male                    |
| DOB    |                         |
| POB    |                         |
| SSAN   |                         |
| Height | 6'2"                    |
| Weight | 208 pounds              |
| Hair   | Brown                   |
| Eyes   | Green                   |

[FOIA(b)(6)]

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription 3/11/94

FOIA(b)(6)

ELMER TIMOTHY STOUT, JR., (black male born [redacted] was interviewed at the Little Rock Municipal Airport, Little Rock, Arkansas, by Special Agents [redacted] Federal Bureau of Investigation (FBI). He was advised that this interview concerned the alleged shredding of "Whitewater" documents by personnel of the ROSE LAW FIRM, Little Rock, Arkansas.

Mr. STOUT advised that his present residence address is 1103 West 23 Street, North Little Rock, Arkansas 72114, no telephone. He stated he is presently employed as a customer service representative with DELTA AIRLINES and works at the DELTA AIRLINES Office, Little Rock Municipal Airport.

Mr. STOUT advised he was employed as a courier for the ROSE LAW FIRM from August 1992 until either December 1992 or January 1993. He stated that, as a courier, his duties included, but were not limited to, transporting files, mail, etc., shredding, and some filing. He stated his usual work hours were from about noon until about 6:30-8:30 p.m. He stated that at that time he was a student at Philander Smith College, but is not currently enrolled.

Mr. STOUT advised the ROSE LAW FIRM had one shredder in the downtown main office. He advised there was no shredder at the remote storage facility. He stated all file destruction was done at the main office during the time he was employed by the ROSE LAW FIRM, and the file destruction was almost always done by couriers.

Mr. STOUT advised all ROSE LAW FIRM offices had trash containers which were picked up at noon each day. One container in each office was for "real trash" which could be put outside for the city garbage truck to pick up, and another container was for trash to be shredded. He stated that this trash was taken down to BOB's (LNU) office for shredding.

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MAR 11 1994

FBI - LITTLE ROCK

Investigation on 3/10/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted]

Date dictated 3/10/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 151

29D-LR-35063

Continuation of FD-302 of ELMER TIMOTHY STOUT, JR. . On 3/10/94 , Page 2

Mr. STOUT advised that BOB's office was usually open during the day, and couriers would do shredding as needed. He stated he does not recall ever having difficulty getting into the room. He stated that MARY RUSSELL had a key to BOB's room in her desk. He stated he thinks BOB locked the room when he left for the day.

Mr. STOUT advised that, when files were to be destroyed, they (the couriers) were instructed to pick them up at the remote storage facility and bring them back to the main office for shredding. He advised that anything picked up for shredding was brought to BOB's room.

Mr. STOUT advised the Firm did a great deal of shredding. He stated that he can recall a couple of times when they got behind, and BOB's room would be full of paper to be shredded.

Mr. STOUT advised he cannot recall specifically shredding anything he knew to have been associated with any of the following:

VINCENT FOSTER, JR.  
BILL CLINTON  
HILLARY CLINTON  
WHITEWATER DEVELOPMENT  
MADISON GUARANTY SAVINGS & LOAN  
JIM GUY TUCKER  
DAVID HALE

Mr. STOUT advised couriers routinely made trips to the Governor's mansion after the 1992 Presidential election. He stated he made trips out there once or twice. He said his deliveries were very small. He stated he did not transport "boxes" to and from the mansion.

Mr. STOUT advised the courier who made most of the mansion trips was BRAD JONES. He stated that JONES is now serving in the U.S. Army in Oklahoma, base unknown.



29D-LR-35063

Continuation of FD-302 of ELMER TIMOTHY STOUT, JR., On 3/10/94, Page 3

Mr. STOUT advised he made many trips to the remote storage facility while he was a courier. He advised the remote storage facility was always locked, and he never saw a guard at the facility. He stated he is unaware of any commercial shredding having been done at the remote storage facility while he worked for the ROSE LAW FIRM.

Mr. STOUT advised he is aware of the allegations concerning the shredding of a box of Mr. FOSTER's files, which allegations have appeared in the newspaper recently. He stated he has no knowledge of any such shredding. He advised that the only courier or former courier with whom he has had any recent contact is BRAD JONES. He stated he has not been contacted by anyone in the ROSE LAW FIRM.

Mr. STOUT advised that, now that he is fully aware of the Government's interest in this matter, he will report any information which he may receive from any source which he believes might be of interest to the Independent Counsel.

Mr. STOUT provided the following information:

|        |                          |
|--------|--------------------------|
| Name   | ELMER TIMOTHY STOUT, JR. |
| Race   | Black                    |
| Sex    | Male                     |
| DOB    |                          |
| POB    |                          |
| SSAN   |                          |
| Height | 5'3"                     |
| Weight | 230 pounds               |
| Hair   | Black                    |
| Eyes   | Brown                    |

----- FOIA(b)(6)

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

Date of transcription 3/14/94

AMY LEE STEWART, Attorney, ROSE LAW FIRM, Little Rock, Arkansas, appeared at the Office of the Independent Counsel, Little Rock, Arkansas, with her attorney, C. MICHAEL BUXTON. Ms. STEWART was advised of the identity of PATRICK J. SMITH, Associate Independent Counsel, and Special Agent [redacted] as well as the nature of the interview.

Ms. STEWART, a member of the ROSE LAW FIRM since 1988 and a partner as of October, 1992, advised that she knew HILLARY RODHAM CLINTON when she was an attorney at the ROSE LAW FIRM and that she had consulted with Mrs. CLINTON in a case dealing with a family matter involving custody. She stated that her field is litigation and that, with the departure of Attorneys FOSTER, HUBBELL, and the others to Washington, she became a partner in the law firm. She advised they have eight attorneys in the litigation section of the firm. She advised that she is not sure of the time frame but that Attorney WEBB HUBBELL asked her if she wanted to be in charge of Mrs. CLINTON's files now that Mrs. CLINTON was going to Washington, D.C. She stated she believes this conversation took place in the hallway between her and Mr. HUBBELL. She stated that Mrs. CLINTON was not in the office at the time this conversation took place and that Mrs. CLINTON's secretary, MILLIE AUSTON, was dealing with Mrs. CLINTON's files. Ms. STEWART stated that, after the furniture had left Mrs. CLINTON's office, there were a lot of files contained in boxes which were in her (CLINTON's) office. She advised that, at some point, she went through the files. On occasion, Ms. AUSTON would bring a file of Mrs. CLINTON's to her (STEWART) and ask what she should be done with it, and Ms. STEWART stated that she would have it sent to an attorney who was dealing with that particular subject matter at that time.

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Ms. STEWART stated that Ms. AUSTON went to Washington, D.C. During the time that she (STEWART) worked with Ms. AUSTON, they did not have an understanding about how to handle Mrs. CLINTON's files. Ms. STEWART stated she assumed that someone was giving Ms. AUSTON instructions on what to do with the files. She stated that she did retrieve from Mrs. CLINTON's

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Investigation on 3/8/94 at Little Rock, Arkansas File # 29D-LR-35063 Sub 11

by SA [redacted] Date dictated 3/10/94  
FOIA RD 56806 (URTS-16302) DocId: 70104948 Page 154

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29D-LR-35063 Sub 11

Continuation of FD-302 of AMY LEE STEWART, On 3/8/94, Page 2

files some files dealing with the Children's Defense Funds and segregated those files in her (STEWART's) file cabinets located outside her office. She also obtained research files and Issue Family files from Mrs. CLINTON's boxes of files. She defined the Issue Family files as being those issues such as the elderly with which Mrs. CLINTON was concerned. Ms. STEWART stated that, although those records were in the file cabinets, she does not remember doing the segregation of the files but must have because they are in her possession. She stated that the Children's Defense Fund files, research files, and Issue Family files are not destroyed, and she still has the files. Further, Ms. STEWART stated that six or more boxes were designated to go to the warehouse facility for storage, but the facility was full, and they were put in a store room at ROSE LAW FIRM on the third floor. She stated she does not have any memory of doing the storing of the six boxes, but she must have been in charge of that activity. She stated that Ms. AUSTON or a file clerk usually moved or reviewed the boxes of Mrs. CLINTON's files.

Ms. STEWART stated that she does not know anything about any destruction of any of Mrs. CLINTON's files, but that Ms. AUSTON would have the authority for the destruction of Mrs. CLINTON's files. She also stated that any record of where Mrs. CLINTON's files went would likely be on a list maintained by Ms. AUSTON. She stated that she saw lists of files of Mrs. CLINTON during the summer of 1993. Ms. STEWART stated that she knows of one list or record of Mrs. CLINTON's files and has been told by Ms. AUSTON that there was another list of Mrs. CLINTON's files. She stated that the second list showed from six to eight boxes containing Mrs. CLINTON's files. She advised that those files were marked as two boxes going to storage, two boxes to be destroyed, and two to three boxes to be forwarded to the White House. She stated that her (STEWART's) secretary, BARB FIELDMAN, has a copy of the second list. She stated that she assumes that the first list that she does not remember had the same designations for Mrs. CLINTON's files as the second list did. Ms. STEWART stated she remembers seeing the second list in November, 1993, after the birth of her twins. She advised that she was in and out of the ROSE LAW FIRM office during the summer of 1993 and did not see the second list until November.

29D-LR-35063 Sub 11

Continuation of FD-302 of AMY LEE STEWART, On 3/8/94, Page 3

Ms. STEWART advised that she talked to Mrs. CLINTON in March of 1993 when Mrs. CLINTON visited Little Rock, and she (STEWART) asked Mrs. CLINTON if she could be of any help to her. Mrs. CLINTON stated that she could take care of her files at ROSE LAW FIRM in response to Ms. STEWART's question. Ms. STEWART stated that was understood but asked her if she could do anything else for Mrs. CLINTON, and the conversation went on to other things. Ms. STEWART stated that she has talked to her attorney about Mrs. CLINTON's files but has not talked to the White House nor Mr. HUBBELL about Mrs. CLINTON's ROSE LAW FIRM files. Ms. STEWART stated that, when the issue of Mrs. CLINTON's files came up, she asked her secretary, Ms. FIELDMAN, if she knew where the CLINTON files were, and Ms. FIELDMAN pointed to the six or eight boxes in Ms. STEWART's office and the file cabinets outside her office and stated that those were Mrs. CLINTON's files. Ms. STEWART stated she has difficulty in putting a definite time period regarding events which occurred when she was involved in handling Mrs. CLINTON's files at the ROSE LAW FIRM.

She further advised she had no knowledge regarding destruction of files of VINCE FOSTER, WHITEWATER, MADISON GUARANTY SAVINGS AND LOAN, DAVID HALE, or JIM GUY TUCKER.

The following is a physical description of AMY LEE STEWART:

|                                       |   |
|---------------------------------------|---|
| <u>Race</u>                           | <u>White</u>  |
| <u>Sex</u>                            | <u>Female</u>   |
| <u>Date of Birth</u>                  | [REDACTED]  |
| <u>Social Security Account Number</u> | [REDACTED] FOIA(b)(6)   |
| <u>Residence</u>                      | 35 Knob View Circle,<br>Little Rock, Arkansas 72205   |
| <u>Occupation</u>                     | Attorney, ROSE LAW FIRM,<br>Little Rock, Arkansas,<br>telephone (501) 375-9131,<br>employed at ROSE LAW FIRM<br>since 1988 and a partner<br>since 1992. |
| <u>Education</u>                      | Graduate of New York<br>University Law School, 1986   |

29D-LR-35063 Sub 11

Continuation of FD-302 of AMY LEE STEWART, On 3/8/94, Page 4

~~Attorney~~

~~C. MICHAEL BUXTON,  
VINSON & ELKINS, L.L.P.,  
The Willard Office Building,  
1455 Pennsylvania Avenue NW,  
Washington, D.C. 20004-1008,  
telephone (202) 639-6571,  
fax number (202) 639-6604~~

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(6)

FOIA(b)(7) - (C)

Date of transcription

3/8/94

LORAIN WOLFE CLINE (white female born [redacted] was interviewed at the Office of Independent Counsel, Little Rock, Arkansas, by Associate Independent Counsel PATRICK J. SMITH and Special Agent [redacted] She was advised that his interview concerned the alleged shredding of "Whitewater" documents and the general office procedures at the ROSE LAW FIRM, Little Rock, Arkansas.

Present during this interview was Ms. CLINE's attorney, C. MICHAEL BUXTON, of the firm of VINSON & ELKINS, L.L.P., the Willard Office Building, 1455 Pennsylvania Avenue, N.W., Washington, D.C., telephone number (202) 639-6613.

Ms. CLINE advised that her present residence address is 5212 Stratford Road, North Little Rock, Arkansas 72116, telephone number (501) 758-2258.

Ms. CLINE advised she is a secretary at the ROSE LAW FIRM and has been so employed since September 2, 1986. She stated the ROSE LAW FIRM is located downtown at 120 East Fourth Street, Little Rock, Arkansas 72201, and her business telephone number is (501) 377-0372.

Ms. CLINE advised that, when she first applied for a position at the ROSE LAW FIRM, VINCENT FOSTER, JR., needed a secretary. She advised he interviewed her, and she was hired. She stated she did not work for any other attorneys until Mr. FOSTER left the Firm on January 15, 1993, to work at the White House for President CLINTON. She stated that, since Mr. FOSTER left, she has worked for JESS ASKEW and SAMMY STRANGE, both attorneys.

Ms. CLINE advised she was responsible for maintaining Mr. FOSTER's files. She stated she was assisted by various file clerks. She stated her present file clerk is SANDRA HATCH. She was unable to recall the names of any other file clerks who worked for her prior to Ms. HATCH. She advised that file clerk assignments are made by JOYCE MCKINNON.

cc. CRIS - Sub 11  
Copy - 104  
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Copy - 50617

Investigation on 3/8/94 at Little Rock, Arkansas File # 29D-LR-35063

by SA [redacted] Date dictated 3/8/94

(X)  
1/2

Handwritten initials and signature

29D-LR-35063

Continuation of FD-302 of LORAIN WOLFE CLINE, On 3/8/94, Page 4

Ms. CLINE provided the following information:

|             |                    |
|-------------|--------------------|
| Name        | LORAIN WOLFE CLINE |
| Race        | White              |
| Sex         | Female             |
| DOB         | [REDACTED]         |
| POB         | [REDACTED]         |
| SSAN        | [REDACTED]         |
| Arkansas DL | 900-07-2656        |

[REDACTED] --- FOIA(b)(6)

FEDERAL BUREAU OF INVESTIGATION

FOIA(b)(7) - (C)

FOIA(b)(6)

Date of transcription 3/11/94

STEVEN D. DURAND, white male, date of birth [redacted]  
 [redacted] Social Security Account Number (SSAN) [redacted]  
 1163 North Taylor Street, Little Rock, Arkansas, telephone number  
 (501) 664-4989, was interviewed at the Office of the Independent  
 Counsel. Present during the interview were PATRICK SMITH, Office  
 of the Independent Counsel; Special Agent (SA) R. LEE WALTERS,  
 Federal Bureau of Investigation (FBI); and MIKE BUXTON, VINSON  
 AND ELKINS LAW FIRM. After being advised of the identity of the  
 interviewers and the nature of the interview, DURAND provided the  
 following information:

*Handwritten initials:*  
 P  
 R  
 W

DURAND advised that he joined the ROSE LAW FIRM in 1989 after graduating from the University of Arkansas at Fayetteville Law School. He advised that he practices in the commercial section of the firm but does very little litigation work. He further advised that he does not have a direct supervisor and, as an associate, is given projects to work on by various partners of the firm.

DURAND stated that GARY GARRETT moved from his old office to ALLEN BYRD's old office at the firm after BYRD moved to Washington, D. C. He stated that this move occurred during the fourth quarter of 1993, possibly in September, but he could not recall the exact date. He further stated that GARRETT's furniture was moved very quickly over one weekend by BOB BOUCHER, but GARRETT's files were not moved as quickly. DURAND further stated that ELISE MC SHAN, a file clerk, was responsible for moving GARRETT's files but, for some reason, took several months.

DURAND advised that, prior to GARRETT's files being moved, STEVE JOYNER moved into GARRETT's old office. He advised that he could not remember when GARRETT's files were moved in total but did remember that some files remained in his work area several weeks prior to Christmas, 1993. He advised that he complained to his secretary several times about a box that was in his work area. DURAND advised that the box was an unsealed, nondescript box that had an 8 1/2 by 11 yellow piece of paper with "to be shredded" attached to it.

*Handwritten notes:*  
 CE: orig - sub  
 copy - sub

*Handwritten file number:* 29D-LR-55063-SUB 11

Investigation on 3/8/94 at Little Rock, Arkansas File # 29D-LR-35063 SUB 44

by SA [redacted] Date dictated 3/9/94

FOIA RD 56806 (URTS 16302) DocId: 70104948 Page 160

*Handwritten signature:* sub



29D-LR-35063 SUB 11

Continuation of FD-302 of STEVEN D. DURAND, On 3/8/94, Page 2

DURAND stated that the box in his work area contained some of GARRETT's files as he looked into the box and saw files with GARRETT's name on them. He stated that he did not look through the entire box and could not explain each document in the box. He further stated that the records he saw were monthly periodic reports by alpha basis of employees who had client receipts during the month. He further stated that the box was removed from his area sometime after January 2, 1994, as he returned from Europe at that time and remembers the box still being there.

DURAND advised that the box was gone prior to February 1, 1994, but he does not recall a specific date in January that it was removed. He advised that he only recalls that the box was "just gone." DURAND advised that he had no conversations with his secretary or anyone else about the box being gone.

DURAND stated that RONALD CLARK had a meeting with all associates of the firm on Friday, February 4, 1994, after an article appeared in the newspaper about couriers at the firm shredding VINCENT FOSTER's documents. He stated that, at the meeting, it became clear to him that the box of shredded documents in question had to have been the box that sat in his work area for several months. DURAND further stated that, if the box had FOSTER's name or initials on it or the documents in the box had FOSTER's name or initials on them, he would remember that and would have immediately brought them to the attention of CLARK at the time.



**Office of the Independent Counsel**

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

*Subpoena to  
Rose Law Firm*



*[Handwritten signature]*

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

your other were drafted  
but not serve on  
service & withdrawn

1135 16<sup>B</sup> 51  
514-8688

SHREDDING

\*\*\*\*\*  
\*\*\* ACTIVITY REPORT \*\*\*  
\*\*\*\*\*

TRANSMISSION OK

|                |                  |
|----------------|------------------|
| TX/RX NO.      | 4246             |
| CONNECTION TEL | 9 1 501 221 8707 |
| CONNECTION ID  | OIC LR           |
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TELECOPY COVER SHEET

OFFICE OF THE INDEPENDENT COUNSEL

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1001 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

telephone (202) 514-8688

facsimile (202) 514-8802

TO:

Bill Duffey

Company Name:

Fax Number:

Message:

Do you have the  
entire index of  
VF Closed Rose files?  
[See the first page attached]

If so, can you send it?  
Thanks

SENDER:

Brett Kavanaugh

Number of Pages:

2 (including this cover sheet)

VINCENT FOSTER, JR.  
CLOSED FILES  
JANUARY 25, 1993

BOX 1

ACI MANAGEMENT, INC./SPECTRUM  
VF'S NOTES  
CORRESPONDENCE  
ORIGINAL DOCUMENTS RECEIVED FROM RICHARD GRAYSON  
EXTRA PLEADINGS  
PRODUCTION TO PLAINTIFF  
PLEADINGS  
ACXIOM/BSA HEWLETT-PACKARD AUDITORS RESPONSE  
ACXIOM CORPORATION/INSIGHT MARKET SYSTEMS, INC.  
CORRESPONDENCE VOL. 1  
PLEADINGS  
EXTRA PLEADINGS  
BACKGROUND MATERIAL  
ACXIOM GENERAL CORRESPONDENCE  
ACXIOM/BSA/THE BEN SILVER CORPORATION  
CORRESPONDENCE  
PLEADINGS  
ARKANSAS LONG RANGE PLANNING  
AETNA INSURANCE CO./MACHEN CONSTRUCTION  
VF'S NOTES  
ARKANSAS LEGAL SERVICES  
ARTHUR MURRAY INTERNATIONAL, INC. AUDITORS RESPONSE

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020193

\* Little Rock

\* subpoena to Rose LF

\*

\* shredded VF documents

\* early 1994 shredding

\* HC shredded Madison files in 1980's

\* look at Bob's report

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



- ④ Shredding maybe did not get all attention it deserved
- ④ couriers lied a lot.