Dear Mr. Greenewald:

This is in response to your Freedom of Information Act (FOIA) request. Please see the selected paragraphs below for relevant information specific to your request as well as the enclosed FBI FOIPA Addendum for standard responses applicable to all requests.

Records responsive to your request have been processed. We made these records available in the FBI’s electronic FOIA Library (The Vault) on the FBI’s public website, http://vault.fbi.gov. On the right-hand side of the home page, under the heading “Vault Links” you can search for your subject alphabetically (click on “A-Z Index”), by category (click on “Categories”), or by entering text into our search engine (click on “Search Vault”). For records responsive to this request, please enter Stanley (Stan Lee) Lieber as the search term.

The available documents represent a final Vault posting of information responsive to your FOIPA request.

Please see the selected paragraphs below for relevant information specific to your request.

☑ Additional records potentially responsive to your subject may exist. Please inform us by emailing foipaqestions@fbi.gov, faxing 540-868-4391, or standard mail if you would like the FBI to conduct a search of the indices to our Central Records System.

☐ Additional records responsive to your request were processed but are not currently available on The Vault. Please inform us if you would like to receive these records.

Please refer to the enclosed FBI FOIPA Addendum for additional standard responses applicable to your request. “Part 1” of the Addendum includes standard responses that apply to all requests. “Part 2” includes additional standard responses that apply to all requests for records about yourself or any third party individuals. “Part 3” includes general information about FBI records that you may find useful. Also enclosed is our Explanation of Exemptions.

For questions regarding our determinations, visit the www.fbi.gov/foia website under “Contact Us.” The FOIPA Request number listed above has been assigned to your request. Please use this number in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation’s determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP’s FOIA STAR portal by creating an account following the instructions on OIP’s website: https://www.justice.gov/oip/submit-and-track-request-or-appeal. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of my response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked “Freedom of Information Act Appeal.” Please cite the FOIPA Request Number assigned to your request so it may be easily identified.
You may seek dispute resolution services by contacting the Office of Government Information Services (OGIS). The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769. Alternatively, you may contact the FBI's FOIA Public Liaison by emailing foipaquestions@fbi.gov. If you submit your dispute resolution correspondence by email, the subject heading should clearly state “Dispute Resolution Services.” Please also cite the FOIPA Request Number assigned to your request so it may be easily identified.

Sincerely,

Michael G. Seidel
Section Chief,
Record/Information
Dissemination Section
Information Management Division

Enclosure(s)
FBI FOIPA Addendum

As referenced in our letter responding to your Freedom of Information/Privacy Acts (FOIPA) request, the FBI FOIPA Addendum provides information applicable to your request. Part 1 of the Addendum includes standard responses that apply to all requests. Part 2 includes standard responses that apply to requests for records about individuals to the extent your request seeks the listed information. Part 3 includes general information about FBI records, searches, and programs.

Part 1: The standard responses below apply to all requests:

(i) 5 U.S.C. § 552(c). Congress excluded three categories of law enforcement and national security records from the requirements of the FOIPA [5 U.S.C. § 552(c)]. FBI responses are limited to those records subject to the requirements of the FOIPA. Additional information about the FBI and the FOIPA can be found on the www.fbi.gov/foia website.

(ii) Intelligence Records. To the extent your request seeks records of intelligence sources, methods, or activities, the FBI can neither confirm nor deny the existence of records pursuant to FOIA exemptions (b)(1), (b)(3), and as applicable to requests for records about individuals, PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(1), (b)(3), and (j)(2)]. The mere acknowledgment of the existence or nonexistence of such records is itself a classified fact protected by FOIA exemption (b)(1) and/or would reveal intelligence sources, methods, or activities protected by exemption (b)(3) [50 USC § 3024(j)(1)]. This is a standard response and should not be read to indicate that any such records do or do not exist.

Part 2: The standard responses below apply to all requests for records on individuals:

(i) Requests for Records about any Individual—Watch Lists. The FBI can neither confirm nor deny the existence of any individual's name on a watch list pursuant to FOIA exemption (b)(7)(E) and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(7)(E), (j)(2)]. This is a standard response and should not be read to indicate that watch list records do or do not exist.

(ii) Requests for Records about any Individual—Witness Security Program Records. The FBI can neither confirm nor deny the existence of records which could identify any participant in the Witness Security Program pursuant to FOIA exemption (b)(3) and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(3), 18 U.S.C. 3521, and (j)(2)]. This is a standard response and should not be read to indicate that such records do or do not exist.

(iii) Requests for Records for Incarcerated Individuals. The FBI can neither confirm nor deny the existence of records which could reasonably be expected to endanger the life or physical safety of any incarcerated individual pursuant to FOIA exemptions (b)(7)(E), (b)(7)(F), and PA exemption (j)(2) [5 U.S.C. §§ 552/552a (b)(7)(E), (b)(7)(F), and (j)(2)]. This is a standard response and should not be read to indicate that such records do or do not exist.

Part 3: General Information:

(i) Record Searches. The Record/Information Dissemination Section (RIDS) searches for reasonably described records by searching systems or locations where responsive records would reasonably be found. A standard search normally consists of a search for main files in the Central Records System (CRS), an extensive system of records consisting of applicant, investigative, intelligence, personnel, administrative, and general files compiled by the FBI per its law enforcement, intelligence, and administrative functions. The CRS spans the entire FBI organization, comprising records of FBI Headquarters, FBI Field Offices, and FBI Legal Attaché Offices (Legats) worldwide; Electronic Surveillance (ELSUR) records are included in the CRS. Unless specifically requested, a standard search does not include references, administrative records of previous FOIPA requests, or civil litigation files. For additional information about our record searches, visit www.fbi.gov/services/information-management/foipa/requesting-fbi-records.

(ii) FBI Records. Founded in 1908, the FBI carries out a dual law enforcement and national security mission. As part of this dual mission, the FBI creates and maintains records on various subjects; however, the FBI does not maintain records on every person, subject, or entity.

(iii) Requests for Criminal History Records or Rap Sheets. The Criminal Justice Information Services (CJIS) Division provides Identity History Summary Checks—often referred to as a criminal history record or rap sheet. These criminal history records are not the same as material in an investigative "FBI file." An Identity History Summary Check is a listing of information taken from fingerprint cards and documents submitted to the FBI in connection with arrests, federal employment, naturalization, or military service. For a fee, individuals can request a copy of their Identity History Summary Check. Forms and directions can be accessed at www.fbi.gov/about-us/cjis/identity-history-summary-checks. Additionally, requests can be submitted electronically at www.edo.cjis.gov. For additional information, please contact CJIS directly at (304) 625-5590.

(iv) National Name Check Program (NNCP). The mission of NNCP is to analyze and report information in response to name check requests received from federal agencies, for the purpose of protecting the United States from foreign and domestic threats to national security. Please be advised that this is a service provided to other federal agencies. Private Citizens cannot request a name check.
EXPLANATION OF EXEMPTIONS

SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552

(b)(1) specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and (B) are in fact properly classified to such Executive order;

(b)(2) related solely to the internal personnel rules and practices of an agency;

(b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;

(b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;

(b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;

(b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;

(b)(7) records or information compiled for law enforcement purposes, but only to the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of confidential source, including a State, local, or foreign agency or authority or any private institution which furnished information on a confidential basis, and, in the case of record or information compiled by a criminal law enforcement authority in the course of a criminal investigation, or by an agency conducting a lawful national security intelligence investigation, information furnished by a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual;

(b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or

(b)(9) geological and geophysical information and data, including maps, concerning oil and gas wells.

SUBSECTIONS OF TITLE 5, UNITED STATES CODE, SECTION 552a

(d)(5) information compiled in reasonable anticipation of a civil action proceeding;

(j)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;

(k)(1) information which is currently and properly classified pursuant to an Executive order in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;

(k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;

(k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;

(k)(4) required by statute to be maintained and used solely as statistical records;

(k)(5) investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his/her identity would be held in confidence;

(k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;

(k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his/her identity would be held in confidence.

FBI/DOJ
This document is made available through the declassification efforts and research of John Greenewald, Jr., creator of:

The Black Vault

The Black Vault is the largest online Freedom of Information Act (FOIA) document clearinghouse in the world. The research efforts here are responsible for the declassification of hundreds of thousands of pages released by the U.S. Government & Military.

Discover the Truth at: http://www.theblackvault.com
NOTE: Hand print names legibly; handwriting satisfactory for remainder.
Indeces: ☐ Negative ☑ See below

Subject's name and aliases

Character of case
BANK FRAUD/EMBEZZLEMENT

Complainant ☑ Protect Source
STAN LEE MEDIA, INC.

Complainant received
☐ Personal ☑ Telephonic Date 5/7/01 Time 10am

Address of Subject
NOT ON FILE - CAN BE LOCATED

Complainant's address and telephone number

Complainant's DOB

Sex
Female

Race ☐ Male ☑ Female

Height

Hair
Build

Age ☑ Female ☐ Male

Weight
Eyes

Subject's Description

Build

Birth date and birth place

Complexion
Social Security Number

Scars, marks and other data

Employer

Address

Telephone

Vehicle Description

Facts of Complaint

COMPLAINANT (C) STATED THAT STAN LEE IS THE CREATOR OF SPIDER MAN, X-MEN AND THE INCREDIBLE HULK. STAN LEE WAS EMPLOYED BY MARVEL COMICS AND AFTER HIS CONTRACT EXPIRED, STAN LEE WENT INTO BUSINESS FOR HIMSELF. C FURNISHED THE FOLLOWING INFORMATION REGARDING STAN LEE MEDIA:

STAN LEE MEDIA IS THEchner of STAN LEE MEDIA. STAN LEE MEDIA HAS

SINCE FOUND THAT COULD NOT HOLD OFFICE FOR THE COMPANY BECAUSE HE

WAS ALSO A

WAS HIRED BY STAN LEE FOR THE

OF THE STAN LEE MEDIA BUSINESS.

IS THE

OF STAN LEE MEDIA AND

ALSO HANDLED

STAN LEE MEDIA

USBMC - Victim

PDF: 10/16/01

6/15/01

37B-1A - 227495

IA

(Complainant received by)

BLOCK STAMP
PRESS RELEASE

CO-FOUNDER OF STAN LEE MEDIA, WALL STREET ANALYST, AND OTHERS CHARGED WITH STOCK MANIPULATION -- LOSS TO INVESTORS EXCEEDS $25 MILLION

ALAN VINEGRAD, United States Attorney for the Eastern District of New York, JAY SKIDMORE, Postal Inspector-in-Charge, United States Postal Inspection Service, New York, and BARRY W. MAWN, Assistant Director-in-Charge of the Federal Bureau of Investigation in New York, today announced the unsealing of an indictment charging PETER PAUL, STEPHEN M. GORDON, JEFFREY PITTSBURG and CHARLES KUSCHE with manipulating the stock price of Stan Lee Media, Inc. ("Stan Lee Media"), a NASDAQ-traded
Internet-based production and marketing company based in Encino, California. PAUL co-founded Stan Lee Media, along with comic book character creator, Stan Lee, who is not charged in the indictment. Prior to the formation of Stan Lee Media, Lee had created characters such as Spiderman, the Incredible Hulk and the X-Men, while working at Marvel Comics. Stan Lee Media was created to produce and promote new comic book characters and stories created by Lee.

Stan Lee Media's fraudulent scheme was orchestrated by PAUL, GORDON, who served as Stan Lee Media's Executive Vice President, PITTSBURG, a Wall Street analyst and owner of the broker-dealer/research firm Pittsburg Institutional, located on Long Island, and KUSCHE, a stock promoter from Darien, Connecticut, who did business as W.S.C.G. Holdings, L.L.C. These defendants are all charged with securities fraud, as well as conspiracy to commit securities fraud. This case is the result of a joint investigation conducted by the United States Attorney's Office, the Postal Inspection Service and the FBI.

The defendants are charged with using various means to inflate artificially and maintain the price of Stan Lee Media stock and to profit from the sale of the stock at its artificially inflated and maintained price, as well as from other transactions involving Stan Lee Media stock. Throughout the scheme, PAUL, GORDON and PITTSBURG manipulated the stock by making transactions through, between and among "nominee" accounts that were set up to hide their control and ownership of the stock, and to manipulate and to disguise their manipulation of the price of the stock.

As part of the scheme, PAUL and GORDON hired analyst PITTSBURG to tout Stan Lee Media to the investing public. To that end, they made false and misleading statements
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA
- against -

PETER PAUL,
STEPHEN M. GORDON,
JEFFREY PITTSBURG and
CHARLES KUSCHE,

Defendants.

THE GRAND JURY CHARGES:

At all times relevant to this Indictment, unless otherwise indicated;

INTRODUCTION

Stan Lee Media

1. Stan Lee Media, Inc. ("Stan Lee Media"), an Internet-based production and marketing company, was founded by the defendant PETER PAUL and Stan Lee. Prior to the formation of Stan Lee Media, Stan Lee had created characters such as Spiderman, the Incredible Hulk and the X-Men while working at Marvel Comics. Stan Lee Media was created to produce and promote new comic book characters and stories created by Stan Lee.

2. In or about August 1999, Stan Lee Media stock began to trade on the OTC Bulletin Board ("OTCBB"). The OTCBB was a quotation service that displayed real-time quotes, last
Total Deleted Page(s) = 3
Page 11 ~ Duplicate;
Page 14 ~ Duplicate;
Page 16 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXXXX
was interviewed pursuant to a proffer agreement at the United States Attorney's Office located in the Eastern District of New York. Present during the interview were Assistant United States Attorney and Special Agent representing provided the following information:

His employment began at

was approached by

was recalled

STAN LEE and met with

advised that was

investigation on 8/8/01 at Brooklyn, New York

File # 196C-NY-278884 Date dictated 8/10/01

by SA

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.
Impression from [ ] that [ ]

STAN LEE was the Chief Creative writer and worked daily at SLM
Continuation of FD-302 of
On 8/8/01
Page 6

stated that

advised

recalled at a SLM

was told by either STAN LEE or

that

STAN LEE was reimbursed
Precedence: ROUTINE

Date: 05/23/2005

To: New York

From: New York
C-28, LIRA
Contact: SA

Case ID #: 318C-NY-278884

Title: STAN LEE MEDIA, INC.; etal;
Securities Fraud;

Synopsis: Agent interview notes maintained in the 1A section of the file.

Details: For information of the file, the following interviews were conducted in Los Angeles, CA from 7/12/04 to 7/15/04. The interviews were conducted in anticipation of a trial that was to begin on 9/7/04. AUSA had not requested FD-302s be made of the interviews due to other investigative priorities during that time. Therefore, the following interview notes will be maintained in the 1A section of the file:

<table>
<thead>
<tr>
<th>Name</th>
<th>Date of Interview</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stan/Lee</td>
<td>7/12/04</td>
</tr>
<tr>
<td></td>
<td>7/13/04</td>
</tr>
<tr>
<td></td>
<td>7/14/04</td>
</tr>
<tr>
<td></td>
<td>7/15/04</td>
</tr>
<tr>
<td></td>
<td>7/16/04</td>
</tr>
<tr>
<td></td>
<td>7/17/04</td>
</tr>
<tr>
<td></td>
<td>7/18/04</td>
</tr>
<tr>
<td></td>
<td>7/19/04</td>
</tr>
<tr>
<td></td>
<td>7/20/04</td>
</tr>
<tr>
<td></td>
<td>7/21/04</td>
</tr>
<tr>
<td></td>
<td>7/22/04</td>
</tr>
<tr>
<td></td>
<td>7/23/04</td>
</tr>
<tr>
<td></td>
<td>7/24/04</td>
</tr>
<tr>
<td></td>
<td>7/25/04</td>
</tr>
<tr>
<td></td>
<td>7/26/04</td>
</tr>
<tr>
<td></td>
<td>7/27/04</td>
</tr>
<tr>
<td></td>
<td>7/28/04</td>
</tr>
<tr>
<td></td>
<td>7/29/04</td>
</tr>
<tr>
<td></td>
<td>7/30/04</td>
</tr>
<tr>
<td></td>
<td>7/31/04</td>
</tr>
</tbody>
</table>
Universal Case File Number: 196C-MT-20084-365
Field Office Acquiring Evidence: KMO
Serial # of Originating Document: 630
Date Received: 8/8/01
From: (Name of Contributor)
(Address of Contributor)
By: SA

To Be Returned: ☐ Yes ☒ No
Receipt Given: ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)
Federal Rules of Criminal Procedure: ☐ Yes ☒ No

Federal Taxpayer Information (FTI): ☐ Yes ☒ No

Title:

Reference: ______________________ (Communication Enclosing Material)

Description: ☐ Original notes re interview of
Interview pursuant to a Preliminary Agreement - EDNY
I met at the office of Stan Lee.

- Stan Lee Media

Stan Lee was selling content.
The Stan Lee Media site initially had little activity, games, letters from Stan Lee. Stan Lee Media was exploring...
Stan Lee - worked daily - Chief Creative writer - writing scripts.

Stan Lee was running that company.
At Stan Lee's office on several occasions

not aware of Stan Lee media
Stan Lee goal was to license True product over,

because Stan Lee should not to create liquidity

Reminded
If John Lee was attached to certain things it would get visibility.

Walter Lee:

... asked at a board meeting...
Suppose to be a personal contribution by Stan Lee. — Stan Lee reimburse the company, and Stan or
I met through stock in 52m.
That they stayed at 52m in hopes of
went to
The company - SCM -

Just The creator...

(Stew Lee wanted to do something for the outset) - Stew Lee confronted

Just before the end of SCM -
Stan Lee via phone

To Stan Lee

Marvel Income

SLM was 1st call Stan Lee Entertainment

Stan Lee never gave

SLM told Lee
Never heard of Eugene Walker

suggested as Lee
Intro. to Stan Lee

Told Stan

- Stan was not aware that
- Stan found out
Currently
of 8 LM... at 8 LM
- 8 LM
The 8 LM Bankruptcy
related to
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1421921-0

Total Deleted Page(s) = 22
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;
Page 17 ~ Duplicate;
Page 18 ~ Duplicate;
Page 21 ~ Duplicate;
Page 22 ~ Duplicate;
Page 59 ~ Duplicate;
Page 65 ~ Duplicate;
Page 66 ~ Duplicate;
Page 67 ~ Duplicate;
Page 68 ~ Duplicate;
Page 69 ~ Duplicate;
Page 70 ~ Duplicate;
Page 71 ~ Duplicate;
Page 72 ~ Duplicate;
Page 73 ~ Duplicate;
Page 74 ~ Duplicate;
Page 104 ~ Duplicate;
Page 109 ~ Duplicate;
Page 110 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX
was contacted at [ ]

was interviewed in the presence of [ ] AND [ ] all of whom [ ] Assistant United States Attorney [ ] also was present during the interview. After being advised of the identity of the interviewers and the purpose of the interview, [ ] provided the following information:

[ ] graduated from [ ] and is currently [ ] to [ ] served as [ ] at STAN LEE MEDIA (SLM). [ ] currently represents [ ] SLM officers and directors in civil lawsuits that have been filed against them as a result of their actions relating to SLM.

[ ] did not have any outside relationship with [ ] or [ ]

[ ] because he had a [ ]

Investigation on [ ] at [ ] California (telephonically)

File # 196C-LA-226637 - 2 by SA [ ]

Date dictated [ ]

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.
At some point after [Redacted] agreed to [Redacted] realized that [Redacted] questioned about [Redacted] and [Redacted] said that [Redacted] statement and [Redacted] SLM later determined that [Redacted] there were [Redacted] may have been present for one or more of these exchanges [Redacted] between [Redacted] and [Redacted] who handled [Redacted] also may have [Redacted] been present. The same is true for [Redacted] through [Redacted] of SLM along with STAN LEE, who was then working for the company as an outside consultant. [Redacted] by a friend of [Redacted] from [Redacted] named [Redacted] SLM did enter into talks about the possibility of [Redacted]
CONTINENTAL, HOLLYWOOD HOLDINGS, UNICORN MEDIA PARTNERS, CYBERIA, MONDO ENGLISH, PARAVERSAL, EXCELSIOR, WORLD NETWORK, and GLOBAL LANGUAGE SOLUTIONS (collectively, the "CONDUIT ACCOUNTS"). The loss to SLM occurred because

has since determined that the

were controlled by and

For example, documentation on one or more of the accounts identifies E.D. WALKER as an officer, director, and/or authorized account holder, when, in reality, WALKER is a former tenant of mother who has been deceased for years.

In addition to the also has determined that STAN LEE's

After began to regarding the engaged in a number of activities

Initially, in contrast to usual habit of discovery occurred in the middle of

After the discovery of
stated that he had because he was said that the

discussed the situation with denied knowledge of then when comments were related to told that was performed at the instruction of. It was at this point that indicated

In addition to the and also contacted regarding the that he should contact SLM's representative told that they had been. It was at this point that told that had been

After finished speaking with contacted then contacted counsel for and informed that did not provided with documentation relating to his

Immediately following
In addition to the
also discovered
about

The problems concerning

When

had with

the

of SLM. Despite the fact that he held
no official position with SLM and that his actual title was that of an
was the person who was

largely a function of the fact that

and SLM's

problems with

input in the company. Even after
continued
to exert his influence over the company. It was not until

that

began to

President WILLIAM
JEFFERSON CLINTON and his wife, HILLARY CLINTON. Sometime in the
middle of 2000,
SLM to fund HILLARY CLINTON's
campaign for the United States Senate.

began

hosting a tribute to PRESIDENT CLINTON and donating the proceeds
from the event to HILLARY CLINTON's Senate campaign. Despite

had that SLM
was going to fund the entire HOLLYWOOD SALUTE TO PRESIDENT WILLIAM
JEFFERSON CLINTON.

telling there was

At this point,
told

by and STAN LEE. said that SLM was not going
to

understanding that
196C-LA-226637

Continuation of FD-302 of

for the but never

At the time that When asked said that the STAN LEE, and that LEE would later confirmed with that LEE did also told

As a result of the actions of and there currently are four (4) lawsuits pending against SLM and its officers and directors.

is aware of information relating to the activities engaged in by and also is aware of
California, telephone number was contacted at his place of business. After being advised of the identity of the interviewing agent and the purpose of the interview, provided the following information:


believed that he was SLM on or shortly before because it was on that date that sent Although he never received any payment from SLM. After a short time -- approximately of SLM was

In his capacity as met and spoke with on several occasions. also was present that had with offices. Despite the fact that never dealt with anyone other than and During said very little. Initially, seemed surprised to learn of the believed that was very angry with gave the impression that he had understanding was that

During the course of of SLM, opened a dialogue with

Investigation on 07/02/2001 at Los Angeles, California (telephonically)

File # 196C-LA-226637 - 3

by SA

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.
California, telephone number believes that he raised the possibility of held by or LEE. also discussed the possibility of from LEE. Neither nor LEE was aware of refused to say whether that such a disclosure might

In total, may have been involved in the SLM matter SLM was caught short by a telephone call from SLM's indicated that he was unaware that

provided interviewing agent with a copy of These documents are being maintained along with this file.
Precedence: DEADLINE 03/21/2002
Date: 02/21/2002

To: San Francisco
From: Los Angeles
WCC-4

Contact: SA

Approved By: kjh

Drafted By: kjh

Case ID #: 196C-LA-226637 (Pending)

Title: STAN LEE MEDIA; Securities Fraud

Synopsis: To request interview of [redacted] and obtain handwriting and signature exemplars.

Enclosure(s): Attached for the San Francisco Division are copies of documents relating to [redacted] including checks purportedly bearing [redacted] signature, account opening documents indicating that [redacted] is [redacted] subjects [redacted] and [redacted] and fax cover sheets signed by [redacted] and containing [redacted]

Details: On October 25, 2001, [redacted] and [redacted] were indicted as a result of their participation in a multi-million dollar check-kiting scheme. [redacted] and [redacted] were executives of STAN LEE MEDIA, an internet company that was co-founded by [redacted] and comic-book legend STAN LEE

[redacted] and EUGENE "E.D." WALKER or WALKER.
Date of transcription: 06/27/2002

FEDERAL BUREAU OF INVESTIGATION

Date of transcription: 06/27/2002

Los Angeles, CA 90025, work
cellular telephone number was interviewed at
the United States Attorney's Office, 312 N. Spring Street, Los
Angeles, CA. Assistant United States Attorney (AUSA) and AUSA were present during the interview. After
being advised of the identity of the interviewing agent and the
nature of the interview, provided the following information:

advised that as an attorney he graduated form
and worked there until

During January 1999, was contacted by a person named because was

and initial meeting was with and

advised that Stan Lee was not involved in the
financial aspects of Stan Lee Media (SLM). and handled all the financial aspects.

SLM was not going to use Lee's old creations such as Spider Man. SLM was a company that was going to be based on new
content. I believed that SLM could not

In addition, and

Investigation on 06/26/2002 at Los Angeles, CA

File #: 196C-LA-226637-A2

by SA

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.
Continuation of FD-302 of ____________________________ On 06/26/2002 Page 6

advised that ______ was ______ of Eat Time Media while the ______ of Mondo English was a Mexican gentleman. _____ could not remember the name of the ______ of Mondo English. _____ advised that around ______ and ______ were going to ______ could not remember the ______ name but stated that the ______
advised that all of the SLM stock that ______ told that he ______

During ______ had discussions with ______ and ______ regarding the ______ advised that ______ and himself.

Around late November or early December 2000, ______ received a telephone call from Merrill Lynch regarding ______ remembered having discussions with Lee on ______ told Lee that ______ there are ______.

______ knew that both ______ and ______ had big houses. ______ had visited ______ never gave ______ an explanation of ______ never asked him how he ______ assumed that he ______ told ______ that he had been ______

told ______ about his ______ ______ told ______ that he had ______ advised that as far as he knew, ______ advised that Macro Media ______ (specifically Macro Media's ______ advised that he never heard of employees at SLM complaining because they couldn't sell their SLM stock. ______ advised that around February/March 2000 the SLM stock price increased to around $25 to $30 per share. Around July 2000, the
196C-LA-226637

advised that at least on two occasions he told and advised that he
FEDERAL BUREAU OF INVESTIGATION

Date of transcription 05/20/2002

account number   date of birth   social security number   of
California, telephone number   employed
at
California, telephone number was interviewed at her place of residence. After being advised of the identity of the interviewing agent and the purpose of the interview, provided the following information:

From   was employed at STAN LEE MEDIA ("SLM") as
had spent

When   started working for he was a

His desk was piled with papers and it was impossible to sit at his desk because of all of the papers that were piled up on the floor. was involved in many different projects and he never threw anything away. In addition to relating to SLM, also created with which including 112 INTERACTIVE, EXCELSIOR PRODUCTIONS, HOLLYWOOD HOLDINGS, CYBERRIA, CONTINENTAL ENTITIES, and possibly several others.

for companies. was for all of these companies. also saw a for EXCELSIOR PRODUCTIONS.

112 INTERACTIVE is a company that was focused on developing English-language audiotapes. MONDO ENGLISH, GLOBAL LANGUAGE SOLUTIONS and THE LANGUAGE SOLUTION are other companies believed that all of these companies were interchangeable and that they were all involved in the same business. was involved with MONDO ENGLISH and occupied an office at SLM. and were also involved in the language

Investigation on 05/18/2002 at Sherman Oaks, California

File #: 196C-LA-226637- Date dictated
by SA

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.
Missing text due to image quality.
Other than the salary to which she was entitled, never received anything of value from or from

but refused

has received telephone call from said that

provided interviewing agents with several items relating to
Universal Case File Number: 196C-LA-226657-A12

Field Office Acquiring Evidence: LA

Serial # of Originating Document: A9

Date Received: 07/10/2002

From: STAN LEE

(Name of Contributor)

(Address of Contributor)

(City and State)

By: SA

(Name of Special Agent)

To Be Returned: ☐ Yes ☑ No

Receipt Given: ☐ Yes ☐ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e)

Federal Rules of Criminal Procedure:

☐ Yes ☑ No

Title:

SLM

Reference:

(Communication Enclosing Material)

Description:

☐ Original notes re interview of

STAN LEE

10-8-02

CR
Background

- To give SL an award
- Attended dinner - sat opposite Ron Reagan
- Impressed
- Sought SL to SL agreed
- SL problems with Ronnie - agreed to let him doiong

So I don't know anything

SLM - Public 4/1/1 year thru dummy Corp / Shell Corp

- Win 1 1/2 yrs - SL steals w/ $90K

A MIRACLE WORKER

Mastery won office in 5 yrs

When SL sent there - mastery working

Handler things

Did what said

Son - greatest/kindest man I ever met

Did everything for except brasses decisions
other GS - provided list
Knows

SL's know on many things
SL knows - Eat Time Media - cases distributor for 7-11 city came
to SLH + entered deal to market cases of comic strips inside
- worked for months

NAME SL wanted to use for SLH

SLH is Co.

Nice guy, SLH investor; lost $5,000

met once or twice @ SLH office
So put sum stock up rather than

One if re advised SL to

SL he asked how to get some of that 70 99

said it

SL silver it by

big, unforgettable conversations – 3-4 times

SL, "I have all this & what if I lose it"

said

SL thinks was doing this – did it to

never said

but the conversations

gave SL impression that to do it.

I hate to borrow, I never borrowed in my life except

SL said. But what if

implied SL

when stock went down

FEB 2002
SL thought this meant they were buying more stock.

SL said:

SL not aware of cash problem @ Co.
Not until [ ] came on that SL & others were alerted to problems.

Hired [ ]

[ ] was running the Co. but [ ] went to run Co. SL he was

[ ] formation of Co.

[ ] did some thing of other Co's

[ ] hurt by [ ]
FROM THE START, SLN was to be a “public” Co.

Go public = we’ll do well, stock will go up + we’ll sell it for a lot
of $$

$200 M

Talked about buying a shell Co - got one for even. on Bulletin Boards + eventually wound up on NASDAQ

SLN worked on - Seventh Portal - Animated Show

Sold to Viacom as Interactive Home Park side

Superhero Comics on Internet

The Drifter + 2 others

Never sure how SLN would do, but Co. seemed to be doing well, always listed as one of Top 10 Internet Cos.

Got to 150 people, everyone busy

ONX how making money, but things looked good

- two blocks what to do
- on make decisions, did
- ONX what he did
SL not involved w/ Finance + bookkeeping

Moea Mums looking for financing

Disappointed in

Many times had poor to make

Not sure if they invested

Macromedia - Invested ~ $5 mm - $10 mm

- To partner w/ him on animation projects

- Head of Macro mm has been on SLT Board

Doesn't know Elliott Associates only by name

DNS Maxi or Santo

Venture Soft - Japanese Co; Big plans

SL?

SL still close of

Venture Soft

VS had problems going public; it all fell apart

Financial problems

SL still in contact w/ Letter ~ 4 yrs ago - most contact
SL: ask how US deal come about.

SL: it was probably generated by, or for:

SL: worked for:

PROBLEMS

SL: slowly, bit by bit, after:

SL: saying that:

SL: not listening to, is trying to act on his own.

SL: talked to, realized that:

Saw that:

SL: on realize that: suspended:

Started talking about:

Later, members feel had been voted out.

This was the 1st time SL knew.

Co. was really in trouble.

Seq: 6/17/79. overhead + no $ coming in.

Had to fire people:

But not staff. had golden parachutes.

So Co. could not offer to keep or fire them.
DAY 7: SL came in with outlines for shows.
met w/ artists
Answered PhoTex letters
Lectures re: SCM
Insurer MTOS & re: SCM
ALL work on creative end

DN ask for final reports - DN understands when

Attend 40 mgz but half asleep

Time to time - only up for: re: "
or whether people who come in were going to invest

Just saw

INSURANCE if projects generated any revenue at all.

PAYMENTS

2x asked for

1x - said
THAT SL had but never used.
So, SL

SDoc - Guaranteed by
Sent to SL by [blank]
maybe when [blank]

DATE
CG - weekly dinner - met SL couple times; hosted receptions, including one of Hillary Clinton

[blank]

[blank]

[blank]

NOT well spoken, not good-looking -
SL ONLY why? got in with famous people

[blank]

[blank]

COMM needed
SL seen

[blank]

[blank]
- Hope to see some out of this Smelling like a Rose

- Never mentioned

- Knows the name. No details impression. Need to raise money/interest there

DNK asks Bluf + SLE re:

- Always looking to get people to promote SLE

In general, no specifics

SC thought this should be pursued

DNK: ED WALKER

[Signature]

[Notes: only/ charming / decay]
DID NOT THINK ANYTHING ABOUT EXCLUSION

JUST related - rushed to bank to deposit check

DID NOT MENTION ANY FINANCIAL PROBLEM

Thought $100,000 was a business matter, not personal

2 Oct/Nov/Dec - looking tense

She thought worried about stock price decline

Last time SC saw was in - they

I still did not think did wrong

Felt awful about being pushed out

Never heard from again

Thought was his close personal friend

Wanted SC to

Months later Lawyer came to office

DN recall the substance

No real conversation
DUB - 12/28/22

9143 ORIOLE WAY 310-
LA 90069

2450 Broadway, Suite 500
SM CA 310-
No personal relationship of

A the house, not

OK if SLM sees had sent up

OK if SLM had policies about reporting on stock

SL one ever doing

SL got 3.5 MM слух

get a bit less or so

Never saw him as calling SLM,

just guessed that he was borrowing on them

OK

Near a time when approached SC and

Asker SC to personally guarantee

any debt of Co.

Not aware of any claims about

US BANK

"shocked"

"shocked"

Aware of equipment purchased by SLM that

were gotten up forgeries of SC's name
Bill Clinton - just a hello.

Earlier - restaurant @ Cost. Del Secretary when Prez was there + SL + greeted by Prez
(SL only if arranged the lunch).

SL only -

SL not means SL at PBO @ 365,000 for cash.

ON PBO? Dinner @
+ tea @ Chase?

енного/Ишон
hns never tried to contact SL.

Pedicure West never tried to contact SL either but SL looks @ website.
Said that he had seen practicing SL’s signature

The equipment leases often had signature below the SL feigning indicating was a witness

Never a $1MM guarantee by US Bank

No contact

Clinton Party

1st Awards of Govt when 1979

Before that, a cocktail party at Gershon’s house

SL not at all political

arranged things + put SL as co-host

SL felt import

SL could say

That’s how SL would find out

6/9/00 Luncher @ SHAC + then afternoon to Gershon
Barley called Gershman about this but she denied all knowledge.

SL wrote it off.

SL sat next to Hillary during concert on New Year's Eve dinner.

Spoke briefly of Bill and Hillary upon their arrival but not later.

Spoke to Hillary & Gershman tea.

intro'd John to Hillary as her "trophy wife".

Next rite @ Gershman's Hillary recalled the trophy wife comment.

& SL stocked.
6/9 - SL contribution + Clinton
 either gave it to ___ or mailed it somewhere

___ may have asked SL to contribute $2,000
SL may have brought check to
 event or may have mailed

___ would use SL’s name as hers + SL loved it

SL not involved at all in planning of 6/9
SL only made introductory speech + nothing else

___ event @ ___ estate
SL assumed getting $ from Gershman
never discussed financing

___ said that it was as greatest thing if

SL could ___ + SL thought it would be great

$6,000 check + NY Senate 2002

SL on recall check
Not SL’s money

___ may have asked SL to sign it

1st I’ve seen of this

___ may have said he wanted to make donation from Co.
+ SL signed it
DO NOT IF CARRIÓN EVER PAID ANY MONEY, but definitely expected to get

or the

- GUARANTOR SIGNED BY

- ON EXPIRATION DATE 8/8/00

- DO NOT EXPECT THIS LETTER, DO CARE ABOUT COST BREAKDOWN

- ONLY WANT ACKNOWLEDGE DEBT

GUARANTOR CAME UNEXPECTEDLY, AFTER L'OR GAVE

COME OF A NOTE THAT SAYS
Not sure if it is SL's signature - looks close, but odd that it is not on line since SL always signs right on the line.

DN remember this check at all.

Assumed check -

"underwriting Clinton strike"

was put on here but SL not sure if that is what it was used for.

Nevar repaid a cent

225,000 written on SL's equity credit line

SL never discussed check of Democratic Party ever

never called by them.

No other payment for Clinton tribute other than check to District M79 1,000 or 2,000

was RG: GEM

After Susan sunk
FAMILIAR

DRY A LOT OF WORK

ADDED TO

GOOD LOOKING GUY - CLEAN CUT

DNR WHAT LINE OF WORK

DNR

RECALL HIM

DNR HE USED SUN OFFICE SPACE

DNR BLOK LNK

NEVER SAT IN ON GOAL PLANNING MEETINGS OR DISCUSSIONS
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1421921-0

Total Deleted Page(s) = 22
Page 27 ~ Duplicate;
Page 30 ~ Duplicate;
Page 37 ~ Duplicate;
Page 38 ~ Duplicate;
Page 40 ~ Duplicate;
Page 39 ~ Duplicate;
Page 46 ~ Duplicate;
Page 49 ~ Duplicate;
Page 57 ~ Duplicate;
Page 60 ~ Duplicate;
Page 70 ~ Duplicate;
Page 71 ~ Duplicate;
Page 81 ~ Duplicate;
Page 82 ~ Duplicate;
Page 91 ~ Duplicate;
Page 94 ~ Duplicate;
Page 113 ~ Duplicate;
Page 122 ~ Duplicate;
Page 124 ~ Duplicate;
Page 130 ~ Duplicate;
Page 131 ~ Duplicate;
Page 137 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXXXXX
FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 06/15/2001

To: Los Angeles Attn: SAC

From: Los Angeles
WCC-6
Contact: SA

Approved By:

Drafted By: dcs

Case ID #: 56C-LA-227506-1 (Pending)

Title: U.S. SENATE CAMPAIGN OF HILLARY CLINTON;
ELECTION LAW VIOLATIONS;
CO: LOS ANGELES

Synopsis: Request to open a preliminary investigation into
allegation of campaign finance violations.

Details: On August 12, 2000, a political fund-raising event was
held in Los Angeles benefitting the U.S. Senate campaign of First
Lady HILLARY CLINTON. The event was called "THE HOLLYWOOD GALA
SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON." It was staged
during the Democratic National Convention which was held in Los
Angeles. This event was hosted by STAN LEE and STAN
LEE is a well-known comic book creator and the founder of STAN
LEE MEDIA. LEE was the host of the event. A total of four
million dollars was raised at the event. 1,400 people paid
$1,000 each to attend the event. Another 150 couples paid
$25,000 to have a lobster dinner with the CLINTONS.

In addition, he was recently

involved with STAN LEE MEDIA.

On May 6, 2001, was interviewed after she made a
complaint to the Los Angeles Division.

job was to

At several planning meetings, was
In Reply Please Refer to File No

Los Angeles, California 90024
June 14, 2001

U.S. SENATE CAMPAIGN OF HILLARY CLINTON;
ELECTION LAW VIOLATIONS;
C/O: LOS ANGELES
56C-LA-227506

On August 12, 2000, a political fund-raising event was held in Los Angeles benefitting the U.S. Senate campaign of First Lady HILLARY CLINTON. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON." It was staged during the Democratic National Convention which was held in Los Angeles. This event was hosted by STAN LEE and STAN LEE is a well-known comic book creator and the founder of STAN LEE MEDIA. STAN LEE was LEE's the of the event. A total of four million dollars was raised at the event. 1,400 people paid $1,000 each to attend the event. Another 150 couples paid $25,000 to have a lobster dinner with the CLINTONS.

In addition, he was recently involved with STAN LEE MEDIA.

On May 6, 2001, was interviewed after she made a complaint to the Los Angeles Division. In was hired by the job was to. At several planning meetings, was introduced to others who were working on the event including:

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.
In Reply, Please Refer to File No.

Los Angeles, California 90024
August 13, 2001

NEW YORK SENATE 2000
CAMPAIGN FINANCE LAW VIOLATIONS
CO: LOS ANGELES
56C-LA-227506

Background

In June 2001, the Los Angeles Division began a preliminary inquiry into allegations that NEW YORK SENATE 2000, a joint fundraising committee affiliated with HILLARY CLINTON's United States Senate Campaign violated, federal campaign finance laws. Specially, these allegations centered around a fundraising event held on August 12, 2000. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (CLINTON TRIBUTE). It was held in Los Angeles just prior to the Democratic National Convention. It has been alleged that an individual named [redacted] of an internet media company called STAN LEE MEDIA, personally paid all the expenses, totaling approximately $1.9 million dollars, for this event. In addition, members of HILLARY CLINTON's campaign staff, specifically [redacted] were aware that [redacted] had paid all the event expenses, and they deliberately failed to disclose the total cost of the event and the real source of the "in-kind" contributions. This allowed NEW YORK SENATE 2000 to retain all the proceeds from the event. These proceeds were later distributed to HILLARY CLINTON's U.S. Senate Campaign, and the Democratic Senatorial Campaign Committee.

The scope of this preliminary inquiry has been a follow-up interview of [redacted], review of documents provided by [redacted] research of the Federal Election Commission (FEC) disclosures filed by NEW YORK SENATE 2000 and its affiliated groups including HILLARY RODHAM CLINTON for United States Senate, Inc., DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE (DSCC), and NEW YORK STATE DEMOCRATIC COMMITTEE. A review of interviews conducting during other FBI investigations and review of media reports.

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.
about the CLINTON TRIBUTE, and an analysis of bank records obtained

is the of STAN LEE MEDIA. STAN LEE MEDIA was incorporated in Colorado in January 1999. The primary purpose of this company was to capitalize on the work of STAN LEE, and the future entertainment promise of the Internet. LEE is a legendary comic book creator of such famous characters as Spiderman, the Incredible Hulk, and the X-Men.

After reaching a high of nearly $30 per share in February 2000, STAN LEE MEDIA stock price crashed, and fell to a low of 13 cents when trading was halted in December 2000.

Complaint of

This case was initiated as a result of a complaint made by is employed as a
She was hired to handle
worked closely with event. For her services in handling was paid a fee of by
This payment was made

On June 21, 2001, a follow up interview was conducted with During this interview, stated that she
et al;
CAMPAIGN FINANCE LAW VIOLATION
56C-LA-227506

<table>
<thead>
<tr>
<th>Vendor</th>
<th>Purpose</th>
<th>Date</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>FRIENDS OF BARBARA</td>
<td>List Rental</td>
<td>9/12/2000</td>
<td>$ 126.80</td>
</tr>
<tr>
<td>BOXER</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>TOTAL</td>
<td>$512,165.03</td>
</tr>
</tbody>
</table>

According to the Quarterly report allocation ratios (Schedule H-2), 40% of the proceeds raised during the CLINTON TRIBUTE were allocated to the Federal Shares and 60% to the Non-Federal Shares. NEW YORK SENATE 2000 did transfer $150,000 from its non-federal account to its federal account.

During her interview on June 21, 2000, [Redacted] was shown a copy of the Schedule H-4 detailing expenses for the CLINTON TRIBUTE. [Redacted] stated that she believed that the contribution identified for STAN LEE MEDIA only covered the expenses for the benefit concert. In addition, [Redacted] believed that BLACK INK PRODUCTIONS was a company. [Redacted] told [Redacted] that he [Redacted] spent over These expenses were for [Redacted] believed that the reported expenses seemed relatively low. In addition, [Redacted] advised that it did not appear that WOLFGANG PUCK's expenses for the TRIBUTE dinner were included in the FEC disclosure statement.

[Redacted] indicated that he was trying to STAN LEE." He sought to [Redacted] claimed that he was approached by his [Redacted] about contributing money to
the Democratic Party in order to advised that he began to attend various Democratic events and donated money to the party. During one particular event, claimed that was approached by Democratic National Committee (DNC) and about making substantial contributions to DNC events in order to gain access to President CLINTON. could then get the President's support for

In addition, had hoped that CLINTON would become involved with STAN LEE MEDIA or after he (CLINTON) left office.

In June 2000, stated that he began to sponsor and attend fund-raising events for the U.S. Senate campaign of HILLARY CLINTON. also began meeting with HILLARY CLINTON's Plans were being made to claimed that he was then introduced to offered to further claimed that and stated that the best way to induce CLINTON to become involved with would be to contribute to HILLARY CLINTON's Senate campaign. According to on July 11, 2000, planning began for a major fund-raising event to be held just prior to the Democratic National Convention. stated that it was his suggestion to

During this meeting, advised that he offered to Shortly thereafter, claimed that he, as an adviser, $10 million in stock, $5 million in cash, and a $1 million contribution to the passed it on to CLINTON. claimed that CLINTON

In addition, according to CLINTON agreed to In addition, CLINTON promised to

promised these in exchange for claimed that
et al;
CAMPAIGN FINANCE LAW VIOLATION
56C-LA-227506

stated that all aspects of the CLINTON TRIBUTE with the White House.
that he indicated that he claimed
In addition, The costs for the event began to mount to nearly $1.25 million dollars about the costs of the event
told
point, stated that he attempted to the CLINTON TRIBUTE because of the mounting costs. However, told him that if he did so, advised that on numerous occasions, HILLARY CLINTON

told that he repeatedly

STAN LEE MEDIA and STAN LEE had no role in financing the event. In addition, even claimed that President CLINTON himself was aware of this fact. CLINTON had been told about

further stated that STAN LEE did agree to However, indicated that he was going to fact, claimed that he did

provided information about a was a towards the cost of the CLINTON TRIBUTE. also

It was arranged for to In addition, claimed that also made was later invited to a
et al.
CAMPAIGN FINANCE LAW VIOLATION
56C-LA-227506

of the CLINTON TRIBUTE, was trying to urge STAN LEE MEDIA to finance the event. stated that he was told by that he and STAN LEE were going to told that STAN LEE MEDIA

In addition, recalled that an individual named and an unidentified staffer for the HILLARY CLINTON U.S. Senate Campaign spent an extended period of time working out of the STAN LEE MEDIA office preparing for the CLINTON TRIBUTE. advised that STAN LEE MEDIA billed for use of the office space, but never paid.

20/20 Television Report

On July 13, 2001, the ABC-TV news program 20/20 aired a report on the CLINTON TRIBUTE and the allegations made by was interviewed for the report. During the report, the ABC news reporter stated that an unidentified HILLARY CLINTON staff claimed that they had simply reported what told them the expenses for the event were. HILLARY CLINTON was approached by the reporter, however, she declined comment.

Analysis of

During a separate FBI investigation into allegations of and associates of STAN LEE MEDIA, records for were subpoenaed. A partial analysis of these revealed that

Arrest of

In early was arrested by law enforcement officials. He is currently awaiting

Concurrence of AUSA

On August 13, 2001, SA was contacted by Assistant United States Attorney AUSA advised that he believed that predication existed to open a full field investigation into the allegations.
FEDERAL BUREAU OF INVESTIGATION

Date of transcription 09/07/2001

residence telephone Social Security Number

was interviewed at the Overland Cafe located at 3601 Overland Boulevard, Los Angeles, California. This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

advised that she is currently employed at the

been in that position for the past stated that

she has worked as an assistant for and off for the past

She was hired by as the

for the HOLLYWOOD GALA SALUTE FOR PRESIDENT WILLIAM JEFFERSON CLINTON ("GALA") advised that her role was to

She worked on the GALA for about until

stated that her working relationship with

has been sporadic. Prior to working on the GALA

In recalled that

However, on each occasion advised that after she

asked her to

The GALA was not specifically mentioned at that time. stated that she was

advised that she was paid approximately

Payment was made through recalled setting accounts in the name of STAN LEE MEDIA (SLM) and PARAPHERNAL. She also would occasionally

Investigation on 8/31/01 at Los Angeles, CA

File # 56C-LA-227506

Date dictated

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.
56C-LA-227506

She would then take to GERSHMAN. GERSHMAN indicated that she would give GERSHMAN's advised that told her that he claimed that told her that he used to. Instead, most recent event that also involved the CLINTONS.

CYNTHIA GERSHMAN was involved with the GALA. She may have given money to support the event. However, did not know what GERSHMAN paid for, or how much she paid. stated that GERSHMAN told her that she (GERSHMAN) was

STAN LEE was not actively involved in the planning of the GALA. advised that she was not aware if LEE was providing financial support. It appeared that was making all the decisions for the event. believed that the proceeds raised during the GALA would be used to support HILLARY CLINTON's United States Senate Campaign.

identified some vendors who were involved in planning the GALA. was working with recolled that was one of the Federal Express donated some shipping expenses, but that was as a result of an error by them. Travel Authority was involved in providing travel services. provided the

was paying for most of these expenses through checks that came from his bank accounts. In June/July 2000, recalled having a phone conversation with During this conversation, told her During another meeting, expressed concerns about the cost of the for the GALA. also recalled having a conversation with during which said he was responsible for of the event. also told that he wanted to of the GALA. This discussion took place at the
residence __________________________ date of birth __________________________
Social Security Number __________________________ was interviewed at the law offices of __________________________ telephone __________________________. Also present at the interview was attorney __________________________ After being advised as to the identity of the interviewing agents and the nature of the interview, __________________________ provided the following information:

stated that she was employed at STAN LEE MEDIA (SLM) from __________________________ She was initially employed as the company’s __________________________ indicated that she was primarily responsible for the __________________________ at SLM. She also had duties within the __________________________ reported directly to __________________________

advised that she was aware of the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (“GALA”). __________________________ indicated that she __________________________ In addition, she did not pay for her ticket.

identified several individuals who were involved in planning the GALA. __________________________ was responsible for __________________________ had an office at SLM. Initially, __________________________ was going to __________________________ stated that she often saw __________________________ at SLM. At one time, __________________________ described as being __________________________ She often heard __________________________ calling different __________________________ Eventually, __________________________

also assisted in planning the GALA.

indicated that __________________________ was the __________________________

Investigation on 8/21/01 at Los Angeles, CA
File # 56C-LA-227506 Date dictated __________________________
by __________________________

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.
Continuation of FD-302 of ____________ On 8/21/01 ____________ Page _______ 2

also used an office within SLM. recalled that once told her that he was responsible for again after the GALA.

and were also involved in planning the GALA. did not know exactly what role was in planning the event. assisted and also wrote letters in support of the event.

advised that SLM did not contribute financially to the GALA. She was aware of the Federal Election Commission (FEC) disclosure statement filed by NEW YORK SENATE 2000 that listed an approximately $366,000 contribution by SLM. stated that the FEC disclosure statement was incorrect. The at SLM had no idea about this supposed contribution. She had specifically told SLM that the company would not have anything to do with the GALA. stated that she was told by an SLM employee named that SLM needed to

Prior to the GALA, told her that he and STAN LEE were personally involved in staging the GALA, and SLM was not involved. also told her that and LEE personally was aware of

was authorized by STAN LEE. stated that LEE told her that he (LEE) wrote the check. In addition, LEE told that he (LEE) later re-paid the money back to SLM. did not know what was the purpose of the check.

indicated that she had wanted to

However, due to time limitations, she never did. She spoke with about recalled that a video editing technician at SLM was asked to assist in preparing something for the GALA. The time for that individual was never billed was unaware of any payments made to SLM to reimburse the company for the support expenses.

indicated that these expenses would have been minimal,
and would not have added up to $366,000 as was identified in the 
PFC disclosure statement.

stated that She would often go through the 
Both and used to

was aware that owned a large home in 
He used to be and he was 
recalled that could also be 
extravagant. spent about

She was first introduced to in

when she 

stated that she first met at some
time (exact date unknown), described himself as a

He considered to be

was aware that had four or five
assistants from an agency to assist with the GALA. She could not 
recall their names. She wanted to make sure that no SLM employees 
were involved with. However, she was aware that a SLM 
would help on his own. went to 
work for

was the

advised that had 
wanted to launch of SLM. 

advised that she helped primarily recalled 

that also attended the GALA. She saw him at the event, and 
they exchanged greetings. However, did not know if financially contributed to the GALA.

was familiar with CYNTHIA GERSHMAN. STAN LEE 
told that he (LEE) was owed LEE claimed that he had taken out a loan and had given the money to 

stated that LEE told her that directed him 

(LEE) to collect the from GERSHMAN. However, LEE has 
ever been re-paid. advised that she had heard that 

GERSHMAN attended a dinner hosted at for PRESIDENT CLINTON. She heard about this dinner from
advised that this group
She was unsure of the charity purpose of the
FOUNDATION. [phonetic], a former[...
worked for another owned company.
believed that the FOUNDATION was [...
for the FOUNDATION advised that STAN LEE had donated his desk to be auctioned off. The money raised was donated to the FOUNDATION.

stated that she had no additional information about the GALA, and the interview concerning the GALA was concluded.
FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/21/2001

We interviewed a at her residence. This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

She and her became involved with STAN LEE MEDIA (SLM) through stated that she was introduced to by approximately ado. is a various parties and charity events. stated that wanted her and to meet with in order to advised that she and did meet appeared to be interested in indicated that also wanted to hire as a to SLM. They set up an office at SLM. recalled that after about a month, said that he did not want to indicated that always believed that SLM She was supposed to be paid However, advised that she was only paid

She was given indicated that she on the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA), and as a result

However, did agree to

During the first week of attended an initial planning meeting for the GALA. The meeting was held at events. advised that she was asked by to

Investigation on 10/19/01 at Beverly Hills, California

File # 56C-LA-227506

by SA

Date dictated

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency, and its contents are not to be distributed outside your agency.
Los Angeles. This dinner may have also been paid for by and CYNTHIA GERSHMAN. The third occasion was at the GALA. advised that she never had any substantive discussions with CLINTON.

met HILLARY CLINTON on one occasion at a This was paid for by However, did not believe it was a campaign event. The was organized by invited various Hollywood celebrities to meet HILLARY CLINTON. No one paid to attend the event. also recalled a time when HILLARY called It was prior to the GALA.

for the event. stated that she did not speak with HILLARY at the GALA. Her conversations with HILLARY were relatively brief, and she never discussed the planning or financing of the GALA with her.

advised that she was paid for her work on the GALA. She believed that she was given a check drawn off it could have come from SLM. employment contract was with

stated that she and left SLM Other employees were stated that another employee named may have more information about SLM. STAN LEE did not have much knowledge about what was going on at the company nor was he involved in planning the GALA. described LEE as being a nice man who was "out of it." In reality, in charge at SLM.

again recalled that and appeared to be very knowledgeable about campaign finance laws. They seemed to be very conscientious about everything concerning the GALA.

advised that she would continue to cooperate in the investigation. At this point, the interview was terminated.
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.
would say that _______ would lie if he was ever confronted about the false disclosure. _______ believed that _______ knew the true cost of the event and he _______ deliberately underreported the amount in the FEC disclosure reports. _______ has not spoken with _______ since this conversation which occurred.

worked on the GALA in _______ while he stayed at _______.

CYNTHIA GERSHMAN did not pay for any of the expenses of the GALA. _______ advised that GERSHMAN _______ during the event because she _______ GERSHMAN may have purchased SLM stock.

were involved with _______ and _______. _______ was an investor in SLM. _______ believes that _______ attended a state dinner at the White House. _______ may have arranged for _______ to get _______ pictures of _______ were taken. _______ was trying to help SLM build a strong relationship _______ and _______ was not aware that _______ had discussed a _______. However, _______ said _______. STAN LEE was not involved with any of the planning for the GALA. LEE may be suffering from the early stages of Alzheimer's disease.

claimed that the AMERICAN SPIRIT FOUNDATION (ASF) was a non-profit group that was not involved in the GALA at all. He denied that any checks were written on the ASF bank account in support of the event. An ASF check written to _______ was for other expenses _______. The ASF check _______ claimed that _______ that he _______ was not responsible. _______ did not work on the GALA. _______ assists _______ with other matters. He _______ has worked on other charity events _______ was another who worked briefly on the GALA. However, _______ did not get along with _______. 
The Los Angeles Field Office of the Federal Bureau of Investigation (FBI). This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

located at

She founded the company approximately ago. specializes in has a background in

HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA). She was retained to help. The GALA was a Hollywood farewell to PRESIDENT CLINTON, and it also was a fundraiser for HILLARY CLINTON's United States Senate campaign. The event would have a concert followed by a sit-down dinner.

Planning for the GALA began in mid to late July 2000. recalled that they only had approximately three weeks to put the event together. The first problem encountered was to find a venue to host the GALA. The initial planning meeting took place at when that meeting took place. was not recall the approximate date was going to was a also present at this meeting were In addition, members of his staff were at this meeting. recalled that this meeting dealt primarily with planning the concert.

KEN ROBERTS estate in Mandeville Canyon was selected by as the venue for the GALA. Prior to the event, there was a meeting at the estate to do a run-through.
Continuation of FD-302 of 

Vendors who worked on the GALA included and from public relations firm: a
and who did the described her own duties as

claimed that she did not have much interaction with during the planning of the GALA. Her primary contact was. However, did appear to be very involved with the event. recalled have a meeting at and were also there. The purpose of this meeting was to discuss the dinner seating and to finalize the tribute journal

was HILLARY CLINTON's Senate Campaign was very involved in all aspects of planning the GALA. He was for the event. In addition, helped to get HILLARY CLINTON supporters to come to the GALA.

speculated that STAN LEE hosted this event to help raise the profile of STAN LEE MEDIA (SLM). However, that was only her speculation. was an SLM employee. recalled that at times she would contact if she needed to get was involved with the

was responsible for who worked on the GALA. When a particular would give it to would then assumed that the money came from SLM.

However admitted that she did not know if it was true. She would sometimes or there were times when

The GALA expenses that provided a spreadsheet that identified those costs incurred (a copy is maintained with this file). However, there were additional costs for the GALA for the concert production. The expenses were incurred by production
Mel's Diner located on the Sunset Strip in West Hollywood, California. This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agent and the nature of the interview, provided the following information:

advised that he is employed in ___________.

For the past _______ he has _______ _______. He has also _______.

_______ were hired by _______ to act as the _______ for the concert portion of the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA). _______ hired _______ at the request of the GALA's _______. and _______ have worked together on many events in the past. _______ stated that he signed a _______ contract with _______ for his _______. services for the GALA. _______ was responsible for _______.

advised that this was the first time that he had ever worked with _______. He _______ was paid _______ for his services on the event.

_______ was responsible for _______. The budget for the _______ portion of the GALA. The budget for the _______. was approximately _______. The budget for the _______. was _______. hired _______ to handle the _______. _______ was the staff _______. _______ was the staff _______. _______ was responsible for setting up the _______. _______ recalled that initial _______. _______ came from a check drawn from an account of _______. A second _______.

Investigation on 11/13/01 at Los Angeles, CA

File # 56C-LA-227506-18 Date dictated _______. by _______.

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency, and its contents are not to be distributed outside your agency.
check for __________ stated that a check for __________ and another check for __________ were drawn from __________. Was also given at the conclusion of the event. __________ estimated that the final cost for the __________ production was on budget at approximately __________. Review a copy of __________.

_________ was the __________ of the GALA. In the past, __________ has __________ the Democratic National Convention and the Inaugural Celebration for PRESIDENT CLINTON. __________ wrote checks to pay expenses for the GALA. __________ did not know if __________ was involved in the day to day planning of the event. __________ was involved in the __________. Among other things, __________ persuaded celebrities to attend and perform at the GALA concert. __________ who was hired by __________ also had a key role in planning of the event. The Mandeville Canyon ranch owned by KEN ROBERTS was selected by __________ to be the venue for the GALA.

_________ for the HILLARY CLINTON United States Senate Campaign, was involved in planning the GALA __________ advised that he did not have much interface with __________. He __________ was not very involved in production of the event until the last __________ days leading up to it. __________ did much of the pre-production work. __________ worked with __________ described __________ as the "super-coordinator" for the GALA. He __________ was a __________ of the HILLARY CLINTON Senate Campaign. __________ also involved in scheduling. __________ never had any discussions with __________ about the expenses for the event. He __________ did not know what was __________ role besides being a "coordinator." __________ was unfamiliar with __________ or __________ sounded familiar, but __________ was unsure. STAN LEE was not involved in any aspect of planning the GALA.
FEDERAL BUREAU OF INVESTIGATION

Date of transcription 12/10/2001

[supplementary information]

In July 2000, [redacted] was told by friends that she should contact [redacted] at STAN LEE MEDIA (SLM) about possible employment. [redacted] called and arranged for an interview. During that interview, [redacted] hired as [redacted] for the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA). [redacted] volunteered to work for the GALA. She worked at an office at SLM.

[redacted] was the HILLARY CLINTON United States Senate Campaign. He [redacted] was the GALA for the CLINTON campaign for the GALA. [redacted] was the GALA who was responsible for.

When an individual would accept an invitation to the GALA, they would send the RSVPs [redacted] was responsible for.

[redacted] recalled that she went with [redacted] to a meeting at [redacted]. The purpose of this meeting was to discuss for the GALA dinner. Also present at this meeting were...
was a donor to the HILLARY CLINTON Senate Campaign. He also worked a little with and had a "professional relationship." They had mutual respect for each other, but they also described as "hyper" about everything.

was involved in the for HILLARY CLINTON that was held at . She did not believe that SLM was involved. However, and were responsible for coordinating this.

advised that she never had any dealings with STAN LEE. LEE was only interested with his comic book creations.

CYNTHIA GERSHMAN was a wealthy GERSHMAN gave The GALA was held at a ranch owned by KEN ROBERTS. did not believe that ROBERTS was paid for the use of the ranch.

The Federal Election Commission (FEC) reports for the HILLARY CLINTON Senate Campaign were prepared by individuals in Washington, D.C. did not know the identity of these individuals.

was the CLINTON campaign official to whom received copies of invoices of expenses from the campaign events. was a campaign is HILLARY CLINTON's just prior to the GALA.

was introduced to at the GALA. assisted in the GALA. She did not have any information about or . Also, had never heard of BLACK INK PRODUCTIONS.

There were several pre-event walkthroughs or rehearsals prior to the GALA. One walkthrough was held a week before the event, a second was held the Monday prior to the event, and the
In Reply, Please Refer to
File No

Los Angeles, California 90024
January 3, 2002

NEW YORK SENATE 2000;
CAMPAIGN FINANCE LAW VIOLATIONS;
OO: LOS ANGELES
56C-LA-227506

The following is an interim report about the progress
of the investigation into allegations that
of NEW YORK SENATE 2000 and others, violated
federal campaign elections laws and made false statements on
Federal Election Commission (FEC) disclosure statements.

Background

In June 2001, the Los Angeles Division began a
preliminary inquiry into allegations that NEW YORK SENATE 2000, a
joint fund-raising committee affiliated with HILLARY CLINTON's
United States Senate Campaign, violated federal campaign finance
laws. Specially, these allegations center around a fund-raising
event held on August 12, 2000 in Los Angeles, California. The
event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM
JEFFERSON CLINTON" (GALA). It was held just prior to the
Democratic National Convention at the home of a wealthy radio
executive named KEN ROBERTS. The GALA featured numerous
entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY
MACLAINE, and DIANA ROSS in a concert followed by a sit down
dinner. This event raised approximately $1.4 million dollars for
NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed
allowable proceeds to the HILLARY CLINTON UNITED STATES SENATE
CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and
called STAN LEE MEDIA (SLM). At the time of the event, SLM was
believed to be a rising star in the emerging Internet media
market. However, several months after the GALA, SLM failed.
Following the failure of SLM, a number of FBI and SEC
investigations were opened.
the company would not have anything to do with the GALA. Prior to the GALA, and STAN LEE were personally involved in staging the GALA, and SLM was not involved. also told her that and LEE personally funded the GALA. was aware of a check for $100,000 made payable to NEW YORK SENATE 2000 that was drawn from an SLM account. This check was authorized by STAN LEE. stated that LEE told her that he (LEE) wrote the check. In addition, LEE told that he (LEE) later re-paid the money back to SLM. did not know what was the purpose of the check.

Analysis of

An analysis of a STAN LEE MEDIA Merrill Lynch-Bank One account revealed that on August 3, 2000 a $100,000 check was made payable to NEW YORK SENATE 2000 (A search of the Common Cause website revealed that STAN LEE MEDIA is credited with making a $100,000 soft money contribution to NEW YORK SENATE 2000 on July 31, 2000.)

Fund-raising Tea on June 9, 2000

On June 9, 2000, two events for HILLARY CLINTON. The first event was a luncheon held at Spago Restaurant in Beverly Hills, California. This event was not a fundraiser. It was a small gathering of 12 to 20 primarily Hollywood celebrities. The event was and STAN LEE. Immediately following the luncheon, a afternoon tea was held at the home of CYNTHIA GERSHMAN. This event was a fundraiser for NEW YORK SENATE 2000. Approximately one hundred people attended this event. Based upon our investigation, it appears that paid for both the luncheon and the tea. However, may have attempted to hide his contribution by using as a middleman.

stated that he helped the luncheon and the tea. He described his role as both the luncheon and the tea. was the for the events. provided the for the luncheon and tea. An analysis of these records revealed that the approximate cost of this tea was $24,000. A vast majority of
FEDERAL BUREA U OF INVESTIGATION

Date of transcription 01/10/2002

I was interviewed in the 16th floor conference room of the Los Angeles Field Division of the Federal Bureau of Investigation (FBI). This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

I have been the AL GORE DINNER held on June 8, 2000 at the Beverly Hills Hotel, the tea for HILLARY CLINTON held at the residence of CYNTHIA GERSHMAN on June 9, 2000 (GERSHMAN TEA), and the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON on August 12, 2000 (GALA).

I assumed that the money had come from STAN LEE MEDIA (SLM) accounts. One of the checks had come from the account of SLM. The address on that check was the same as SLM.

would occasionally give indicated that she wanted to make sure that everyone got paid. She would On occasion, would even account that was had received the indicated that had prepared several. In one announcement, STAN LEE and CYNTHIA GERSHMAN are listed. In another announcement, and LEE are listed. Finally, in a third announcement, and LEE are listed as advised that

For example, would send the announcement STAN LEE stated that it was an

The checks were drawn from an account that was stated that

was

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency, if and its contents are not to be distributed outside your agency.
FEDERAL BUREAU OF INVESTIGATION

residence

interviewed at the law offices of

Attorney was also present. This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agent and the nature of the interview, provided the following information:

is currently

was a member of the

He was an

For approximately

was a member of the

He was an

PRESIDENT WILLIAM J. CLINTON and VICE PRESIDENT ALBERT GORE. For many years he worked looking to leave

He was initially introduced to by (phonetic). In

was hired by to become the and to be a to STAN LEE MEDIA (SLM).

was an that was established to provide and he was trying to attract investors. Other employees at included and used to be a

He was in charge of

was also hired as a to and SLM. He believed that wanted to exploit his contacts personally introduced to expressed concern that his association with may have hurt his reputation. was more a of PRESIDENT CLINTON. However, believed that

Investigation on 2/27/02 at Century City, CA

File # 56C-LA-227506-27

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency and its contents are not to be distributed outside your agency.
Any knowledge how the GALA was funded. Claimed not to have

CLINTON U.S. SENATE CAMPAIGN. to oversee the production of the GALA. He worked closely with and let

Did not have a lot of dealings with. He did ask for assistance to

Claimed that he never had any discussions concerning the funding of the GALA or any other campaign finance issues with and would usually meet. These meetings often took place outside of SLM offices. Maintained an office at SLM from approximately. He was still at SLM when

Believed that in arranging the luncheon at Spago Restaurant, and the tea at the home of CYNTHIA GERSHMAN in June 2000. Was invited to these events, but he did not attend. He did believe that both of those events were fundraisers for HILLARY CLINTON's Senate Campaign. Also did not attend a tea host by CHER or a dinner at the home of both were held in late September 2000. Did attend both the GALA concert and the dinner afterwards.

Was aware that had made pledges of money to the DNC. These pledges occurred at the and at the. However, never fulfilled those pledges.

Had not heard of BLACK INK PRODUCTIONS. He was involved in producing the GALA. She worked closely with and. She was involved in CYNTHIA GERSHMAN is a wealthy philanthropist who is met her at an event for AL GORE.

The idea of a Medal of Freedom for STAN LEE. He believed that LEE was more aware of activities than he (LEE) had led on. Did not know what LEE's involvement in the GALA was. It has been suggested that LEE is "out of it." However, LEE always appeared to be lucid during meetings with

Expressed his was closely involved in production of the GALA. He was also had a
was interviewed at his residence. This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

is currently employed as an ___________. He owns a company called ___________.

recalled that approximately 90 to 100 people attended the tea hosted by the actress CHER at the Casa Del Mar Hotel in Santa Monica, California, on September 29, 2000. advised that he was sure that this tea was a fundraising event. NEW YORK SENATE 2000 was responsible for raising money for the event was not involved with the tea. indicated that at this time, was running out of money. During the tea, spoke and introduced HILLARY CLINTON. CHER also spoke during the event. advised that he may have paid some of the bills for the tea. was the (telephone) was the ___________ for the event.

stated that he spent most of the day with HILLARY CLINTON on ___________. That evening, held a fundraising dinner for NEW YORK SENATE 2000 does not like because he was also not involved in the planning of that dinner. However, believed that was involved in raising money for the event. SPAGO may have catered the dinner. stated that he had nothing to do with this event.

advised that he ___________ tickets for the tea held at CYNTHIA GERSHMAN's residence on June 9, 2000. It was supposed to be a fundraising event. recalled that he
for NEW YORK SENATE 2000 during the GERSHMAN tea. At that event, he donated money to NEW YORK SENATE 2000. In addition, the wife of STAN LEE, his wife JOAN LEE, possibly also raising money. However, he did not have direct knowledge if raised any money.

was at the offices of STAN LEE MEDIA (SLM) during the planning of the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA). During this time, drove a named is the wife of is currently under investigation by the Los Angeles Police Department for A detective named interviewed about paid his bill with his expenses. told never to tell anyone about that were given to the CLINTONS during the GALA from is a who has a She has telephone numbers of and

CYNTHIA GERSHMAN purchased stock and loaned money to SLM. She wrote checks to companies called EXCELSIOR PRODUCTIONS and CELEBRITY ENTERPRISES as investments, but also to help out the company. GERSHMAN never got any of her money back.

advised that the check from to in the amount of was to repay had with wrote the check to for
FEDERAL BUREAU OF INVESTIGATION

Date of transcription: 03/27/2002

was interviewed at his place of business. This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

is the owner of. He has been in business for approximately
specializes in assisting individuals in

involved in throughout the World. also

His clients, including pay a monthly retainer for his services. In addition, will receive a fee for

On occasion, became involved with STAN LEE MEDIA (SLM) when he did not know the time frame for this. However, it was when SLM had possibly in late. has known for about He first met at. asked if he was with his client. After the called to He and then developed a friendship, and had heard negative things about. It was believed that had been was surprised that STAN LEE seemed to be "out of it." LEE appeared to not know what was going on.

Investigation on 3/27/02 at Los Angeles, CA

File # 56C-LA-227506; 196C-LA-226637-32 Date dictated ____________________________
by SA ____________________________

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.
FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY Date: 05/15/2002

To: Washington Field Attn: Public Corruption Squad

From: Los Angeles

WCC-6

Contact: SA

Approved By: 

Drafted By: dcs

Case ID #: 56C-LA-227506 (Pending)

Title:

NEW YORK SENATE 2000;
CAMPAIGN FINANCE LAW VIOLATIONS;
OO: LOS ANGELES

Synopsis: To request assistance from Washington Field Office in regards to the above captioned investigation.

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million dollars for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON UNITED STATES SENATE CAMPAIGN and the DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed. Following the failure of SLM, a number of FBI and SEC investigations were opened. In
Precedence: PRIORITY  Date: 07/09/2002
To: Chicago Attn: Public Corruption Squad
    Washington Field Squad C-20
    Criminal Investigative Public Corruption Unit

From: Los Angeles SSA IL.
    WCC-6 C:cls
    Contact: SA

Approved By: ______________________________
Drafted By: ________________________________

Case ID #: 56C-LA-227506 (Pending)--44

Title: ____________et al;
NEW YORK SENATE 2000;
CAMPAIGN FINANCE LAW VIOLATIONS;
CO: LOS ANGELES

Synopsis: To request assistance from Chicago Field Office and
Washington Field Office in regards to the above captioned
investigation.

Details: In August 2001, the Los Angeles Division began a full
field investigation into allegations that NEW YORK SENATE 2000, a
joint fund-raising committee affiliated with HILLARY CLINTON's
United States Senate Campaign, violated federal campaign finance
laws. Specially, these allegations center around a fund-raising
event held on August 12, 2000 in Los Angeles, California. The
event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM
JEFFERSON CLINTON" (GALA). It was held just prior to the
Democratic National Convention at the home of a wealthy radio
executive named KEN ROBERTS. The GALA featured numerous
entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY
MACLAINE, and DIANA ROSS in a concert followed by a sit down
dinner. This event raised approximately $1 million for NEW YORK
SENATE 2000. NEW YORK SENATE 2000 then distributed allowable
proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE
CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and
of an Internet media company
called STAN LEE MEDIA (SLM). At the time of the event, SLM was
Precedence: PRIORITY

Date: 08/19/2002

To: Chicago

Attn: Squad WC-3
SSA
SA

Criminal Investigative

Attn: Public Corruption Unit
SSA

From: Los Angeles
WCC-6

Contact: SA

Approved By: [Signature]

Drafted By: [Signature]

Case ID #: 56C-LA-227506 (Pending)

Title: NEW YORK SENATE 2000; CAMPAIGN FINANCE VIOLATIONS;
OO: LOS ANGELES

Synopsis: Request assistance from the Chicago Division for the above captioned investigation.

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON'S United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million dollars for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON UNITED STATES SENATE CAMPAIGN and the DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1421921-0

Total Deleted Page(s) = 9
Page 7 ~ Duplicate;
Page 9 ~ Duplicate;
Page 40 ~ Duplicate;
Page 41 ~ Duplicate;
Page 66 ~ Duplicate;
Page 67 ~ Duplicate;
Page 68 ~ Duplicate;
Page 76 ~ Duplicate;
Page 79 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
Individual (hereafter referred to as Source), who has agreed to testify was interviewed. Also participating in the interview were Public Integrity Section, Election Crimes Branch, and the Source's attorney. Source provided the following information:

Source advised that "THE HOLLYWOOD GALA" (hereafter referred to as GALA) The GALA was held at the ROBERTS ESTATE approximately two years ago, as a fundraiser for HILLARY CLINTON's United States Senate Campaign. It raised millions of dollars for HILLARY CLINTON's campaign. Source stated that he (Source) did not believe that HILLARY or WILLIAM CLINTON were aware of what was going on. An individual named CYNTHIA GERSHMAN also paid expenses. GERSHMAN gave lots of money for Democratic causes, and was Source recalled that GERSHMAN told the television news show 20/20 that she was invited to the dinner as a result of her large campaign contributions.

Source indicated that may have spent at least However, the campaign did not report the true amount of "in-kind" contributions received for the GALA in the Federal Election Commission (FEC) campaign finance disclosure report. Source advised that under-reporting "in-kind" contributions are common in Democratic Party fundraising, and was not unique to the GALA. Fundraising goals are established and budgets are created. Source indicated that budgeted cost is usually the amount that is reported in the FEC disclosure reports, even if the actual costs exceeded the budgeted costs. In addition, individuals who have reached the maximum legal amounts that they can donate are often solicited to make in-kind contributions.

Date dictated

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.
Source did not believe that anyone

Source identified another fundraising event where reported in-kind contributions were significantly undervalued.

were involved in that event. Source repeated that undervaluing expenses was very common, but it was done especially during large events. He (Source) also believes that reports about the amount of money raised is sometimes inflated for "press purposes."

HILLARY CLINTON and still have a good relationship.

Source himself still

Source advised that it would be very unusual for

Source advised that STAN LEE is trying to portray himself as a victim. However, LEE used the GALA to try and raise the profile of SLIM. Source believed that LEE had donated to other political candidates and causes in the past. CYNTHIA GERSHMAN is a very wealthy widow who

Source indicated that He (Source) was not involved in the

stayed at
FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE  Date: 09/26/2002
To:  New York  Attn: Squad C-14 - Public Corruption
From: Los Angeles
WCC-6
Contact: SA

Approved By: 

Drafted By: 

Case ID #: 56C-LA-227506* (Pending)

Title:   

New York Senate 2000;
Campaign Finance Violations;
OO: Los Angeles

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

Synopsis: Request to serve enclosed Federal Grand Jury subpoenas.

Enclosure(s): For New York, are the original and one copy of each Federal Grand Jury subpoena.

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was
Precedence: ROUTINE  Date: 09/30/2002

To: San Francisco   Attn: Oakland RA

From: Los Angeles
   WCC-6
   Contact: SA

Approved By: 

Drafted By: 

Case ID #: 56C-LA-2275064 (Pending)

Title: et al;
NEW YORK SENATE 2000;
Campaign Finance Violations;
CO: Los Angeles

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

Synopsis: Request to serve enclosed Federal Grand Jury subpoena.

Enclosure(s): For San Francisco, are the original and one copy of each Federal Grand Jury subpoena.

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed.
To: International Operations
Criminal Investigative

From: Los Angeles
WCC-4

Case ID #: 56C-LA-227506 (Pending)

Title: \[et al; \]
New York Senate 2000;
Campaign Finance Law Violations;
CO: LOS ANGELES;

Synopsis: Request Legat assistance to interview and

Enclosure(s): For Legat copy of list of questions for

Details: In August 2001, the Los Angeles Division began a full
field investigation into allegations that NEW YORK SENATE 2000, a
joint fund-raising committee affiliated with HILLARY CLINTON's
United States Senate Campaign, violated federal campaign finance
laws. Specially, these allegations center around a fund-raising
event held on August 12, 2000 in Los Angeles, California. The
event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM
JEFFERSON CLINTON" (GALA). It was held just prior to the
Democratic National Convention at the home of a wealthy radio
executive named KEN ROBERTS. The GALA featured numerous
entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY
MACLAINE, and DIANA ROSS in a concert followed by a sit down
dinner. This event raised approximately $1 million dollars for
NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed
allowable proceeds to the HILLARY CLINTON UNITED STATES SENATE
CAMPAIGN and the DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE.

The GALA was hosted by comic book legend STAN LEE and
of an Internet media company
called STAN LEE MEDIA (SLM). At the time of the event, SLM was
To: ] From: Los Angeles
Re: 56C-LA-227506, 11/14/2002

that a named was a major investor in SLM. is the In and his
named
to meet with and STAN LEE. On August 12, 2000, and attended the GALA. It has been alleged by
that made a contribution to NEW YORK SENATE 2000 Video taken during the GALA showed that
Investigation has also revealed that established a relationship with E-mails
seized from SLM showed that and In
INS records revealed that
and attended.
It has been alleged that is believed to be At the current time, not much details about background has been
developed.

Legat is requested to locate and interview and about their relationship with SLM, and others. Specifically, to determine whether ever contributed or was solicited to contribute money to the Democratic Party or specific Democratic candidates. A list of questions to aid the interviewer is enclosed. Please call SA at if any questions arise about these interviews.

Descriptive Data:
Main Subject
Name -
Last:
First:
Race:
Sex:
DOB:
POB:
PNO:
Address(es) -
House #:
Street Name:
City:
State:
Postal Code:
Country:
Phone #:
Questions for

Background

1. Name, address, date of birth, place of birth, identification information (i.e. driver license, passport, social security number)

2. Educational background

3. Occupation - What is Nature of business? Position with the company? How did you become involved in the company?

Relationship w/Stan Lee Media

4. How did you first become aware of SLM?

5. Who was your primary contact at SLM? Stan Lee?

6. How did you first meet

7. What did you know about Background?

8. Were you an investor in SLM? If so, how much did you invest? When did you make the investment? What method? To whom did you give the money?

9. Did you pledge to give additional money to SLM? How much? When did you make the pledge? To whom?

10. Did you ever visit the offices of SLM? When? Can you recall the location? Who did you meet with? What was the purpose of the meeting(s)?

11. Did anyone from SLM ever visit you Who? When? What was the purpose of the meeting?

12. When was the last time you met with anyone related to SLM? Who? When? Where? Why?

Hollywood Gala Salute to President Clinton

13. Did you attend an event honoring President Clinton in August 2000? Who invited you to attend the Gala? Did you receive an invitation? Where did the Gala take place? Can you recall the date of the Gala?

14. What was the purpose of the Gala? Was it a political fundraiser? How did you know the purpose? Who told you? (Details about knowledge of the Gala)

15. Did you pay to attend the Gala? If yes, how much did you pay? To whom did you pay? When did you pay? What method
Precedence: ROUTINE

To: Chicago

From: Los Angeles

Attn: Squad WC-3

Date: 12/20/2002

Contact: SA

Approved By: 

Drafted By: 

Case ID #: 56C-LA-227506 (Pending)

Title: New York Senate 2000; Campaign Finance Violations; 

Synopsis: To request assistance from the Chicago and Washington Field Offices in the above captioned investigation, and to provide information on the progress of this case.

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws and made false statements to the Federal Election Commission (FEC). Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY
To: Chicago  From: Los Angeles
Re: 56C-LA-227506, 12/20/2002

MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed. Following the failure of SLM, a number of FBI and SEC investigations were opened.

The Los Angeles Division investigation has revealed that NEW YORK SENATE 2000 deliberately undervalued the in-kind contributions made by and SLM in staging the GALA. In filings to the Federal Election Commission, NEW YORK SENATE 2000 claimed in-kind contributions of expenses for the GALA of approximately $400,000. However, the investigation has uncovered the true value of the in-kind contributions to be more than $1 million dollars. As a result, NEW YORK SENATE 2000 distributed prohibited federal or "hard money" proceeds of more than $200,000 to the HILLARY CLINTON FOR UNITED STATES SENATE campaign.

In addition, investigation has also revealed other irregularities in the committee's FEC filings. This included another event sponsored by and SLM that was held in June 2000, and a Birthday Gala for HILLARY CLINTON held in October 2000 in New York City.

was closely involved in the planning of the GALA. He spent several weeks at the offices of SLM. has allegedly made statements

At the present time, is the

The location of offices is
URGENT REPORT

Date: 01/23/2003

To: The Director

CC: Deputy Director
EAD, Criminal
Director’s Office
AD, Criminal
DAD, Criminal
Section Chief, Integrity in Government/Civil Rights Section
Unit Chief, Public Corruption/Government Fraud
OPCA
SIOC

From: Los Angeles

For Further Information Contact: SSA [off: cell:]

Preparer Of Urgent Report: SSA Squad WCC-4

Subject: New York Senate 2000;
Campaign Finance Law Violations;
OO: Los Angeles
56C-LA-227506

Description Of Matter:

RECENT DEVELOPMENTS

Simultaneous to agents from LAFO and Washington Field Office will issue grand jury subpoenas
The subpoenas will be to
Furthermore, two employees of New York
It should be noted, at this time, Senator Hillary Clinton is not a target of this investigation.

BACKGROUND

In August 2001, LAFO began a full field investigation into allegations that New York Senate 2000, a joint fund-raising committee affiliated with Hillary Clinton's United States Senate Campaign, violated federal campaign finance laws and made false statements to the FEC. Specifically, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California, entitled "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). This event raised approximately $1 million for New York Senate 2000, which in turn, distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN. The GALA was hosted by comic book legend Stan Lee and[__________] of an Internet media company called Stan Lee Media (SLM).

The LAFO investigation has revealed that New York Senate 2000 deliberately undervalued the in-kind contributions made by[__________] and SLM in staging the GALA. In filings to the FEC, New York Senate 2000 claimed in-kind contributions of expenses for the GALA of approximately $400,000. However, the investigation has uncovered the true value of the in-kind contributions to be more than $1 million dollars. As a result, New York Senate 2000 distributed prohibited federal or "hard money" proceeds of more than $200,000 to the HILLARY CLINTON FOR UNITED STATES SENATE campaign.

[__________] was closely involved in the planning of the GALA. He spent several weeks at the offices of SLM. [__________] has allegedly made statements[__________]. In addition[__________].

At the present time[__________]. The location of[__________] Investigation has revealed that[__________].

In[__________] a cooperating witness (CW), who is[__________]. During proffer sessions, the CW provided important evidence of wrongdoing[__________]. The CW also provided information about[__________].
Precedence: PRIORITY
Date: 01/29/2003

To: Los Angeles
Washington Field Office
New York

Criminal Investigative

From: Los Angeles 
WCC-4
Contact: SA

Case ID #: 56C-LA-227506 (Pending)

Title: New York Senate 2000;
Campaign Finance Law Violations;
AO: Los Angeles

Synopsis: Request permission for SA(s) and to travel to the New York Division on February 2-3, 2003, and to Washington DC on February 3-4, 2003 to conduct interviews on the above captioned investigation.

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAKTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.
The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed. Following the failure of SLM, a number of FBI and SEC investigations were opened.

The Los Angeles Division investigation has revealed that NEW YORK SENATE 2000 deliberately undervalued the in-kind contributions made by and SLM in staging the GALA. In filings to the Federal Election Commission, NEW YORK SENATE 2000 claimed in-kind contributions of expenses for the GALA of approximately $400,000. However, the investigation has uncovered the true value of the in-kind contributions to be more than one $1 million. As a result, NEW YORK SENATE 2000 distributed prohibited federal or "hard money" proceeds of more than $200,000 to the HILLARY CLINTON FOR UNITED STATES SENATE campaign. In addition, the investigation has revealed that

In addition, investigation has also revealed other irregularities in the committee's FEC filings. Another event sponsored by and SLM that was held in June 2000 does not appear to have been disclosed or reported at all.

was closely involved in the planning of the GALA. He spent several weeks at the offices of SLM. has allegedly made statements

At the present time,

The location of

In addition, federal grand
Precedence: ROUTINE  Date: 04/01/2003
To: Los Angeles  
New Orleans  
Criminal Investigative  

Attn: SAC  
Attn: SAC  
Attn: SAC  

From: Los Angeles:  
WCC-4  
Contact: SA  

Approved By:  
Drafted By:  

Case ID #: 56C-LA-227506 - (Pending)  

Title: et al;  
NEW YORK SENATE 2000;  
CAMPAIGN FINANCE VIOLATIONS;  
OO: LOS ANGELES  

Synopses: Request permission for SA(s) and to travel to the New Orleans Division on April 16-18, 2003, and to travel to Washington D.C. during the week of April 28 through May 2, 2003.

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.
To: Los Angeles
From: Los Angeles
Re: 56C-LA-227506, 04/01/2003

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed. Following the failure of SLM, a number of FBI and SEC investigations were opened.

The Los Angeles Division investigation has revealed that NEW YORK SENATE 2000 deliberately undervalued the in-kind contributions made by and SLM in staging the GALA. In filings to the Federal Election Commission, NEW YORK SENATE 2000 claimed in-kind contributions of expenses for the GALA of approximately $400,000. However, the investigation has uncovered the true value of the in-kind contributions to be more than one $1 million. As a result, NEW YORK SENATE 2000 distributed prohibited federal or "hard money" proceeds of more than $200,000 to the HILLARY CLINTON FOR UNITED STATES SENATE campaign and the DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE (DSSC). In addition, the investigation has revealed that.

In addition, investigation has also revealed other irregularities in the committee's FEC filings. Another event sponsored by and SLM that was held in June 2000 does not appear to have been disclosed or reported at all.

was closely involved in the planning of the GALA. He spent several weeks at the offices of SLM. has made statements.

also.

In a cooperating witness (CW) was proffered by the reporting agent in Washington D.C. The CW is a.

During these proffer
residence California, telephone was interviewed at the office of telephone was represented by his attorney. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

advised that he was told by (identified as described as a businessman who worked with to talk with however, it did not work out because of current problems.

explained that he did not receive the told him that wanted to talk to him. Finally, the respond also

stated that his last contact with was She wanted to talk to about wanted to indicated that has not talked to

Date of transcription 04/08/2003

Investigation on California

File #56C-LA-227506-1 Date dictated

by SA

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.
stated that has also been

The last time that talked to was at the
indicated that told him

 involving
the HOLLYWOOD GALA SALUTE. It was paid by a STAN LEE account or by
also explained that for
the whole time that
planned to have at the event (HOLLYWOOD
explained that had told him that
knew about it. indicated that he knew knew about the
(Also, knew that this was happening because he was
to STAN LEE MEDIA and then was used
for the GALA. would be a good witness because she
is not sure if he
knows much. was not sure how
but knows it was given to STAN LEE MEDIA. Also, was
trying to
is no longer keeping in touch with has not talked to her

In had dinner with at
was going to. While
at dinner, informed that
" did not say anything more about
it and has never heard anything more from.

 indicated that he has not talked anymore to anyone
else about is not sure what will talk to
him about. use to
explained that STAN LEE MEDIA gave

However, eventually indicated that he has also paid for

has contacted

Recently,

also pointed out that knew about the

explained that worked with explained that knew everything and specifically talked about

also knew that STAN LEE MEDIA paid for paid for their

Also, knew that Also,

The deal was indicated that others were also

Also, the contacted and requested in order to said that

explained that STAN LEE wants a

Also, explained that
FEDERAL BUREAU OF INVESTIGATION

Date of transcription 05/05/2003

Social Security Number was interviewed at the Department of Justice, Office of Public Integrity, 1400 New York Avenue, Washington D.C. Participating in the interview was Trial Attorney. was represented by and of the law firm. This interview had been prearranged telephonically. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

is currently employed as This is a She has been employed with since was employed as a the Democratic Senatorial Campaign Committee (DSCC). was employed from as the is a left because she did not enjoy being a From was employed as a. Her job was She described her position as being a indicated that she helped manage She also handled

is a graduate of Following her graduation, went to work for a However, she had an interest in politics. In went to work for as a member of the After the was promoted to After WILLIAM CLINTON was elected President, went to work at

Investigation on 4/30/03 at Washington D.C.

File # 56C-LA-22756-126 Date dictated

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.
was not involved in the planning of the
HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA). However, In late
she went to a fundraiser in Chicago. Following the event, she went
and others. could not recall much about the Chicago fundraiser. She did not know if had paid for any of the expenses nor did she have any information on who actually hosted that event.

A day or so before the GALA, and others did a
During this she looked at the
when she first saw the
she did not recall that anybody expressed any
corporate about the opulence of the event. and were also
and was
stated that she only vaguely recalled a
meeting.
She did not remember any
discussions about problems with
She was familiar with
however, did not recall
was pretty sure that
also attended
It is possible
that
than he had informed about, and that would
attended
the GALA on August 12, 2000. and
produced the GALA. However, was not sure who actually
paid for the event. was in the
in charge of the GALA, and he was responsible for
Other campaign staffers who worked with
included
and
stated that she first met during the
GALA. However, it was possible that she had met him during the
advised that she did not know how much
Total Deleted Page(s) = 7
Page 18 ~ Duplicate;
Page 19 ~ Duplicate;
Page 20 ~ Duplicate;
Page 23 ~ Duplicate;
Page 26 ~ Duplicate;
Page 32 ~ Duplicate;
Page 34 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X

XXXXXXXXXXXXXXXXXXXXXXXX
Precedence: ROUTINE

To: Criminal Investigative Attn: Public Corruption Unit

From: Los Angeles
WCC-6

Contact: SA

Approved By: 

Drafted By: dcs

Case ID #: 56C-LA-213514 (Pending)

Title: 
U.S. SENATE CAMPAIGN OF HILLARY CLINTON;
ELECTION LAW VIOLATIONS;

Synopsis: To provide information to FBIHQ about allegations regarding possible election law violations as a result of a fund-raising event held to raise money for the U.S. Senate Campaign of Hillary Clinton.

Enclosure(s): One (1) FD-302, dated May 8, 2001, of interview with [ ] and one (1) FD-302, dated May 10, 2001 of telephonic interview with [ ]

Details: On May 6, 2001, an interview was conducted with [ ] was a [ ] for an event held in Los Angeles on August 12, 2000 called the "HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON." This event was held as a fundraiser for the US Senate Campaign of Hillary Clinton. This event was hosted by STAN LEE and [ ]. STAN LEE is a well-known comic book creator, and the founder of STAN LEE MEDIA. [ ] is LEE's [ ] and he was [ ]. The event [ ] was named [ ] responsibility was to handle the [ ]

Following the event, [ ] was paid her fee by [ ] However, she is still owed more than [ ] in expenses. [ ] told [ ] to collect this money. However, repeated attempts to collect from [ ] have been unsuccessful. [ ] has [ ] bad checks.
Precedence: ROUTINE

To: Los Angeles
Seattle
Criminal Investigative

Date: 12/29/2004

Attn: SAC
Attn: SAC
Attn: Public Corruption Supervisor
Attn: GF/PCU

From: Los Angeles
WCC-4

Contact: SA

Approved By: LJC

Drafted By: NCE

Case ID #: 56C-LA-227506 (Pending)

Title: NEW YORK SENATE 2000; CAMPAIGN FINANCE VIOLATIONS; OO: LOS ANGELES

Synopsis: Request authorization to travel to the Seattle Division on January 2 and 3, 2005 to conduct an interview of a witness related to the above captioned investigation.

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON’s United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called “THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON” (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was...
was interviewed at the United States Attorneys Office, Eastern District of New York. This interview was conducted pursuant to a proffer agreement. Also present at the interview was Assistant United States Attorney from the Eastern District of New York and United States Department of Justice, Public Integrity Section (USDOJ-PIS), attorneys and was represented by his attorney. After being advised as to the identity of the interviewing agents and the nature of the interview, provided the following information:

of fundraising events benefitting the United States Senate campaign of HILLARY RODHAM CLINTON. was the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (hereafter referred to as the GALA).

had established a fundraising event. had worked on interested in being more involved with PRESIDENT WILLIAM J CLINTON and First Lady HILLARY RODHAM CLINTON. Hollywood talent to various fundraising events. advised that to assist the Democratic Party.

provided some background about his relationship with was first introduced to

successful in convincing various celebrities to attend these events. advised that
Continuation of FD-302 of

On 12/20/2004, Page 2

His efforts with the Democratic Party: his primary goal was trying to get STAN LEE.

He advised his first foray into Democratic politics during the 2000 election cycle was an event that

It was held in Hollywood. He made a contribution to the Democratic National Committee during that event. He introduced to a number of Democratic party officials, including,

He advised that he briefly met PRESIDENT WILLIAM CLINTON at this dinner.

He appeared to have some kind of pull with the President.

To recruit him as a Democratic fundraiser. This happened just a couple of weeks after the event. He stated that he wanted to establish a relationship with PRESIDENT CLINTON.

Official recognition for STAN LEE.

To discuss planning a fundraising event. To meet and financially support the Presidential campaign of AL GORE.

He recalled that he attended a fundraiser at the home of this event. He met HILLARY CLINTON at
However, at that time, I did not know it was the first time they had ever met. I believed that contribution was made during that event. However, he could not recall the check. It was possible that he gave the check to STAN LEE.

I met PRESIDENT CLINTON and HILLARY CLINTON during an event at that time, advised that he had pictures taken of those pictures. 

He has tried to obtain copies for the purpose of putting on fundraising events for HILLARY CLINTON and the Democratic Party. Based upon what he observed at the event, he had connections with the CLINTONS and with Democratic officials. His goal was to establish a relationship with PRESIDENT CLINTON and getting recognition for STAN LEE.

However, it would not have been that much, and he could not remember specifically if he did it. The purpose of this money was to pay expenses for campaign fundraising events.

I pledged for HILLARY CLINTON campaign. He pledged for each campaign. He committed to HILLARY CLINTON's Senate campaign during a tea held at the home of CYNTHIA GERSHMAN. He recalled that he had a conversation during these fundraisers. Support HILLARY's campaign and
Continuation of FD-302 of 12/20/2004 Page 6

had been previously given some background about the proposed GALA.

friends. appeared to be personal with SLM. As planning for the GALA continued, set up at SLM.

considered a for SLM.

SLM executives had told SLM was not involved in the planning of the GALA, and On numerous occasions, was aware of the expenses for printing and postage. possible witnesses to some of including

However, he was still speaking with almost on a daily basis.

wanted STAN LEE to be identified as a contributor to the GALA. A direct contribution would make it look better for him (STAN LEE), instead of just providing only in-kind contributions. SLM

was unfamiliar with NEW YORK SENATE 2000.

were aware of everything that was going on with the GALA. He
During this fundraiser, I spoke with the President, HILLARY CLINTON, and working with STAN LEE, the President was grateful for the help and the contribution to HILLARY's campaign. I do not recall if I attended the event. During the event, I was introduced by President CLINTON as indicated that he was embarrassed and surprised about the revelations about relationship with the CLINTONS. After the Washington Post articles appeared, I maintained a relationship with advised that the only contact I had with after the GALA was
New York, telephone        date of birth
was interviewed at her place of employment
This interview had been prearranged telephonically.
Participating in the interview was Department of Justice, Public Integrity Section, trial attorney was represented by her attorney After being advised as to the identity of the interviewing agent and the nature of the interview, provided the following information:

is currently employed as
Prior to her employment with she was hired for the HILLARY RODHAM CLINTON FOR UNITED STATES SENATE campaign.

she was hired before was hired in
did not know him nor work with him. In addition, she did not really work with him during the 2000 election. was responsible for all

Overall, and

got along well

advised that appeared to be knowledgeable about the basics of Federal Election Commission (FEC) rules and regulations concerning campaign finance. In 2000, the basic rules were that each campaign could raise $2,000 per person per election, $25,000 for the national party, and soft money contributions were unlimited. the campaign was very careful on how they raised money because of the high profile nature of HILLARY CLINTON. She did have fundraising goals that she needed to meet.

Investigation on 3/31/05 at New York City
File # 56C-LA-227506 - Date dictated
by SA

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.
spent about 4 to 6 weeks in Los Angeles planning the HOLLYWOOD GALA SALUTE ("GALA"). It was held just prior to the Democratic National Convention. The staff included (and ) was the main staff member. was primarily used as fundraising consultants to help him with events. was advised that she did not know much about the planning of the GALA. She did attend the GALA. It was one of the premiere events of the campaign. recalled that the AL GORE campaign was upset because they felt that the GALA was going to upstage the convention. She attended the Democratic National Convention. Her responsibilities included (and ) who were at the convention.

did not have interaction with

However, she heard about (and )

She did not know much about STAN LEE MEDIA. She had heard of STAN LEE because of LEE's background at Marvel Comics. had never heard of (and ) and never met him. She indicated that the GALA was not the typical fundraising event. recalled that there was a cocktail party followed by a concert and then a dinner. She also recalled that guests received a gift bag filled with CDs, a blue suede tribute book, and an Art Schlesinger book about Presidents. Overall, believed that the GALA was an "ridiculously expensive event." In the weeks after the GALA, recalled that there was some "gossip" about the costs of the event. However, she could not provide any specifics about the nature of that gossip. Any and all costs related to the GALA would have needed to be reported to the FEC.

advised that she would never spend $400 per night for any hotel room. Whenever she traveled, indicated that (or would try and stay at a hotel that charged more reasonable rates.

recalled that the campaign had to pay for

Initially, she believed that (and ) would pay for the expense, but eventually the campaign paid the bill. This occurred after the election was over.
Universal Case File Number SG-LA-22750Q0

Field Office Acquiring Evidence

Serial # of Originating Document

Date Received 8/31/01

From

(Name of Contributor)

(Address of Contributor)

(City and State)

By

(Name of Special Agent)

To Be Returned □ Yes □ No

Receipt Given □ Yes □ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure □ Yes □ No

Title:

e f a l

Reference: (Communication Enclosing Material)

Description: Original notes re interview of 8/31/01
Cynthia role - was involved - she hosted events at her home -> may have given $ for the gala. Doesn't know what she was paying for. Cynthia was tired of extending her loan.

At 5pm -> not sure about gala

 деком вордел

Stern felt not actively involved in the event. Don't know about financial support. Making all decisions.

Doesn't know how believed it was to support H Clinton vs Senate campaign.
STAN LEE, date of birth 12/28/1922, social security account number of 9143 Oriole Way, Los Angeles, California 90069, was interviewed at his place of employment, 2450 Broadway, Suite 500, Santa Monica, California. LEE was interviewed in the presence of counsel, (telephonic) and both of the law firm of SKADDEN, ARPS, SLATE, MEAGHER & FLOM. of the Securities and Exchange Commission also was present for the interview. After being advised of the identities of the interviewing persons and the purpose of the interview, LEE provided the following information:

LEE is the creator of numerous comic book characters, including SPIDERMAN, DAREDEVIL, and the INCREDIBLE HULK. For many years, LEE was the Chairman of MARVEL COMICS. In order to reduce his salary, however, MARVEL COMICS released LEE from his lifetime contract and bestowed upon him the honorific of Chairman Emeritus. LEE still receives a salary from MARVEL, but after the change LEE was given permission to pursue other business opportunities.

LEE first met approximately ago, called LEE out of the blue and said that the organization had selected LEE to receive an award. LEE attended an awards dinner at which he was seated next to REAGAN. After LEE received the award, asked LEE to LEE agreed. Over the next several years, at which LEE got to meet celebrities and other famous persons.

Eventually, said that LEE was It was after these types of conversations that and LEE From the very earliest days, the public nature of the company as a way for him and LEE to LEE objected on the grounds that he did not know anything about forming or running a company, but said that also said that he wanted because then and LEE would plan was to go public, do well, the stock price would go up, and then they could get sell their shares for $200 million.

07/10/2002 Los Angeles, California

196C-LA-226637, 56C-LA-227506

SA

SA
These discussions resulted in the formation of STAN LEE MEDIA (SLM). STAN LEE and took the company public within a year of its founding. STAN LEE took the company public by using a shell corporation. Approximately six (6) months after the company went public, and LEE owned shares worth approximately $90 million.

Prior to the formation of the company, explained to LEE that would said that he was involved in and set him up. The scheme had something to do with LEE already viewed as a "miracle worker," and was willing to believe virtually anything that told him. After all, had introduced LEE to and many others.

When LEE and were getting ready to start SLM, LEE rejected the idea and convinced LEE to use pre-existing office space in California, that was already working for at the time that SLM was formed. LEE met at the offices. said that was the greatest and smartest person that had ever met. said that pulled whatever asked him to do. was the did everything except make the decisions. Rather, it was who LEE does not know much about other business ventures. LEE is aware that had a called, but never really got off the ground. was another company that was somehow related to also had companies named although LEE is not sure what these companies were for. was a nice person and a SLM investor. lost a lot of money in SLM. LEE believes that used in order to secure a life insurance policy for LEE. also may have EAT TIME MEDIA was to be a SLM venture that involved the placement of comics into pastries that would then be sold at convenience stores. The project was discussed for several months, but it never got off the ground.
is the and was a LEE met on two (2) occasions. Once, came to the SLM office and was introduced to LEE. The second meeting occurred when came to the SLM offices and LEE's board of directors or its executives about an

Although LEE has an account at MERRILL LYNCH that predated his involvement in SLM, LEE placed all of his SLM stock directly with LEE does not remember whether or encouraged him to

On several occasions, LEE asked what was the use of

That is, said LEE should do

That is, advised LEE to

Laid said that LEE should

Laid said that LEE should

Laid said that LEE should

Laid said that LEE should

That is, never specifically said that he was

but LEE got the definite impression that was doing precisely that implied that LEE

Additionally, LEE assumes that was

was

during this time period, including

There was a very careful focus on the price of the SLM stock, and were always very

At one point, when the stock price began to go down -- possibly in February or March of 2000 -- complained that said he was

There were numerous occasions when LEE asked or about the status of the SLM stock. This was particularly the case when the share price began to decline. and always told LEE that he need not worry. and said that

LEE took this to mean that and were buying more SLM stock. told LEE that he was
LEE was not aware of any cash crunch or financial problems at SLM until well after was hired as SLM's new, who said that he wanted to be...

Despite the fact that it was to hire and and were advocating that, LEE did not yet realize that was and so he was focused on trying to shore up between and Eventually, convinced the board to spent a great deal of time and effort trying to was disappointed in the including There were many instances where asked LEE to

LEE recalls that MACROMEDIA invested $5-$10 million into SLM. MACROMEDIA was introduced to SLM through a VENTURE SOFT was another company that was going to invest in SLM, but the deal fell through when VENTURE SOFT's ran into financial troubles of his own. LEE became relatively close with during trips that LEE made to and still correspond on occasion.

LEE is not familiar with companies named MAXI or SANTO.

LEE became aware little by little of problems that existed at SLM. LEE was late to learn of the problems because he has no knowledge of financial matters and because he made no effort to keep on top of the financial condition of the company. At one point, told LEE that the company was in dire financial straits because the company was burning through $1 million per month in overhead, while simultaneously generating no appreciable revenue. said that the company had to fire people, but that it could not afford to fire the art staff because they all had guaranteed contracts. Basically, SLM could not afford to keep or fire its employees.

All of this information came as a surprise to LEE, although in hindsight LEE realizes that he was foolish in turning a blind eye to the realities of the company. Rather than consider
whether or not the company was making money, LEE chose to focus on the fact that the stock was worth tens of millions of dollars and the company was consistently recognized as one of the Top 10 internet companies in the United States. LEE did not ask for financial reports or updates, and LEE would pay no attention when financial matters were discussed at board meetings.

LEE does not know whether or not SLM generated any revenue. At its height, SLM employed 150 employees, all of whom seemed to be very busy. In addition to the EAT TIME MEDIA project, SLM also produced an animated show called the SEVENTH PORTAL which SLM eventually sold to VIACOM for use in a theme park. SLM also created superhero comics that it made available to the public via the internet.

LEE considered [ ] to be his closest friend. LEE was thinking of making [ ], the executor of LEE's estate at the time that [ ] left the [ ] but LEE never acted on this plan. [ ] seemed to feel the same way insofar as [ ] asked LEE to [ ].

There are two (2) occasions when LEE entered into a [ ] On one occasion, LEE and [ ], interviewing agents showed LEE checks dated 11/06/2000 on which LEE pays $100,000 to STAN LEE MEDIA and LEE is paid $100,000 on a check signed by [ ] and written on the MERRILL LYNCH account of a company called EXCELSIOR PRODUCTIONS. LEE confirmed that these checks reflect the transaction that LEE [ ] did not offer any explanation for why [ ] Rather, [ ] said that he [ ] from LEE. When LEE said that he did not have [ ], assured LEE that [ ].

LEE cannot recall whether [ ] or whether [ ] gave him [ ]. In any case, LEE rushed the check to the bank and was relieved when the check cleared. LEE was not worried that [ ] would cheat him out of the money. LEE just was not comfortable having any uncertainty relating to such a large amount.

LEE does not know why [ ], LEE figured that it had something to do with taxes, but he never asked. LEE was completely trusting of [ ] and did not give any indication that he was having financial problems at the time that [ ] Rather, [ ] seemed to be doing extremely well in his business. LEE assumed that the transaction was a business matter, and not a matter involving [ ] personally.
The concerns that LEE entered into with LEE gave to LEE did not have the one and only time that LEE borrowed money.

Well after the LEE received an unsolicited LEE believes that the letter came after had already gone. The letter, a copy of which was provided to agents and is being maintained with this file, reads as follows:

The document is signed by and contains a signature date of LEE does not know why LEE also has no idea why the rather than was a person who was somehow connected to used to take credit for said that was an unpleasant man who always seemed to be around celebrities and famous people. LEE does not know what did to attract these types of people, considering that he was neither well-spoken nor good-looking.
to CYNTHIA GERSHMAN, the woman referenced in the above document. GERSHMAN was a rich widow. After LEE received the above he contacted GERSHMAN. GERSHMAN said that she did not have anything to do with LEE does not know whether SLM employees had accounts with LEE was not close to either or.

When LEE and formed SLM, LEE received approximately 1% more shares than LEE received 3.6 million shares and LEE received the larger amount because he jokingly said that he wanted to be the big man in the company. LEE never sold any shares for his own benefit. On one occasion, after complaining to LEE said that it would LEE acted on advice and LEE's LEE does not know whether ever sold shares in SLM. LEE assumed that only borrowed on the shares.

LEE has never heard of LEE absolutely never authorized or anyone else to represent that LEE would personally guarantee any loss suffered as a result of financial problems at SLM. Specifically, LEE never said that he would give a personally guarantee to cover losses incurred by US BANK in exchange for a forbearance agreement that would require US BANK to hold off on filing suit against SLM. LEE expressed "absolute shock" to hear that such an offer had been made. LEE was not aware of any claims that US BANK was making against SLM.

LEE is aware of certain equipment purchases and/or leases that were obtained by SLM pursuant to obligations containing the forged signatures of LEE. These equipment obligations were and contain signatures. said that he once saw but LEE does not know whether it was or who was signing LEE's name. Many of these equipment sellers are suing LEE despite the fact that the signatures are plainly forged.

Neither nor ever admitted any wrongdoing to LEE. The last time that LEE spoke to was when LEE walked into office to
Sometime after SLM had closed its offices, LEE attended a meeting with [redacted] and his attorney. [redacted] also attended the meeting. LEE does not recall any substantive comments by [redacted].

[redacted] brought LEE in contact with President WILLIAM CLINTON and his wife, HILLARY CLINTON. LEE attended a concert and a dinner that was conducted as a fundraiser for the CLINTONS. The concert/dinner was billed as the Hollywood Gala Salute to President Clinton. The first time that LEE heard about the Gala was when [redacted] told LEE that he was "going to a big party." Prior to the party, LEE already had met the CLINTONS at a cocktail party that was held at GERSHMAN's house. It was typical that [redacted] would inform LEE when he needed to keep a date open in order to attend a political or other event. LEE was not at all political and would strictly respond to cues from [redacted] would tell LEE that he was to be a co-host of an event or that LEE needed to save a date because LEE was going to be hosting a party for HILLARY CLINTON. LEE felt very important when he was included in this manner.

On 06/09/2000, LEE attended a luncheon at SPAGO and then attended an afternoon tea later that same day at the GERSHMAN residence. It was on this date or soon after that LEE made a $2,000 contribution to CLINTON. LEE does not recall whether he gave the check to [redacted] during one of the events of the day or whether he mailed it in after the fact. LEE assumes that [redacted] asked LEE to make the contribution.

LEE did not have any involvement in the planning of the Hollywood Gala. Rather, LEE's only involvement was that he prepared and gave the introductory speech. In contrast, [redacted] was the [redacted]. The Gala was held at the estate of KEN ROBERTS. LEE assumed that GERSHMAN was underwriting the cost of the event, although LEE never discussed the [redacted] with LEE. The one thing that LEE did focus on was [redacted]. LEE also thought that this would be a great development.

LEE does not have any recollection of having made a $100,000 contribution to New York Senate 2000 and does not recall ever having seen the check purportedly bearing his signature. LEE said that the signature looks very close to his and that he may have signed it at [redacted] request. The only reason that LEE questions whether the signature is his relates to the fact that LEE always signs directly on the signature line and this signature is floating. LEE assumes that [redacted] told him that he [redacted] LEE would not have paid as much attention to the disbursement if it came from the SLM account, rather than
his personal account. It is the personal nature of the $100,000 exchange payments and the $225,000 payments that made them so memorable to LEE.

LEE's memory of the $225,000 check to PARAVERSAL is very clear. LEE recalls that asked him

The notation, "underwriting Clinton tribute" was specifically placed on the check, but LEE does not know whether the money was actually spent on this purpose. LEE has never been repaid any portion of the $225,000. After the GALA, LEE recalls that tried to

This was a typical maneuver by who would always

LEE never discussed any of these transactions with employees of the Democratic Party.

LEE did not make any other payments for the CLINTON Gala. LEE may have made a couple of $1,000 or $2,000 contributions for other matters, such as a local District Attorney's re-election campaign.

LEE was not familiar with any of the names relating to the GALA, other than and LEE does not know

or LEE never sat in on any planning meetings relating to the Gala.

LEE does not know whether GERSHMAN ever paid any money, but

LEE was surprised when he received the from in which warned LEE to finally said that

LEE is familiar with the name but LEE does not know why the name is familiar to him. LEE remembered the name because it is a unique sounding name. LEE does not know what business may have had with SLM. LEE did not have any dealings with or his firm. LEE was not aware that engaged in
or that he issued research reports for companies. LEE does not know any companies that were promoted or covered by [blank] or his firm.

LEE is not familiar with the names E.D. WALKER or [blank]
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1421921-0

Total Deleted Page(s) = 1
Page 32 - b5; b6; b7C;

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
X  Deleted Page(s)  X
X  No Duplication Fee X
X  For this Page  X
XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
FD-340 (7-19-00)

Universal Case File Number 566-LA-227506-1A

Field Office Acquiring Evidence LA

Serial # of Originating Document

Date Received 6/1/01

From ____________ (name of contributor)

(Address of Contributor)

Los Angeles (City and State)

By

To Be Returned □ Yes □ No

Receipt Given □ Yes □ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure □ Yes □ No

Federal Taxpayer Information (FTI) □ Yes □ No

Title: New York Senate 2000

Hollywood Gala

Reference: (Communication Enclosing Material)

Description: Original notes re interview of

20 _____ 6/21/01

10/18/01-AM
American Spirit Fund
This group gave

words to celebs

American Spirit + Language

Solutions — had offices at 54th

Non-profit was defrocked

Hann donated his clock — money went
t to ASF. Unaware of what states is
or where they went.
Told not have anything to do with political event.

Doesn't know what was done.

Was by Stem Lee - why?

Lee said asked him to
No way - still paid $366,000 only asset deposit had no idea about this.

Had a company that had not inaccurate the FEC report.

Specifically told not to pay for tribute event to be careful was stated was involving the company. made this statement said put its event.
was Sun was good

was invited to tribute - he attended

unmentioned financial tribute

Sun at event - said hello

Cynthia Gershman - Stan Lee said

we sold for $50 - paid

would be paid by Gershman. Never

was paid

bad dinner at

Gershman was invited also - may have told him
Flold OfIIce Acqu1riDIEvld ....

SerW II

of

oI&lDatlDS

Docume.a t

JO/{o/

/)01

... ...

To Be Returned □ Yes □ No
Receipt Given □ Yes □ No
Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)
Federal Rules of Criminal Procedure □ Yes □ No
Federal Taxpayer Information (FTI) □ Yes □ No
Title: New YORK Senate 2000

Campaign Finance Violation

Reference: (Communication Enclosing Material)

Description: □ Original notes re interview of
302- □...:..:... 10/19/01

11/10/01-...
5/18

Met through [underline]

w/ [underline]

Set up office at 5 u.m. After a month I did not want to [underline]

thought it was a stock play

was impressed to stock [underline]

Claimed he spent a million on event

was going to [underline]

could not [underline]

Told [underline]

was going worth immediately
Sten See - was not involved. Tried if

wanted to get

of sin

was hand working - legitimate

indicates checking to clay

operation

not sure of his role

not sure also - met him. But

not dealing with him

asked if she could

event - was very involved - was rewarded

Went to

Hillery Clinton campaign
met w/ Pres Clinton

Dinner paid for w/ Cynthia then post June

Gala

No conversation w/ Clinton

Dinner at [redacted] paid for leg

not a fundraiser...

[redacted]

Called in and [redacted] for the

event at all

Received [redacted] for service in

event... came from [redacted] or from

Steve Sie in 2000

[redacted] were very concerned about the everything... conc. w/ Bill Webster
Universal Case File Number: 66-CA-227506/19

Field Office Acquiring Evidence: LA

Serial # of Originating Document: 

Date Received: 10/23/01

From: 

(Name of Contributor)

(Address of Contributor)

Los Angeles (City and State)

By: 

To Be Returned: No

Receipt Given: No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure: 

Federal Taxpayer Information (FTI): No

Title: New York Senate 2000 Campaign Finance Violations

Reference: (Communication Enclosing Material)

Description: Original notes re interview of 302- 

Date: 10/23/01
- Tribute was only event for Democrats  
  - Tea for H.C. hosted by Chen (Sept 2002)  
  - Tea @ Beinhorn (June) (Spent $10k)  
  - Luncheon at Spago June-

- Unsure if introduced everyone to  
  DNC  
  DNC officials 

- met with

about expenses for event - was well aware of actual costs.
Cynthia Benson did not pay half for gala. Was doing other things, SLM would buy stocks to help out.

were involved

gave money for SLM - if she did, was doing for SLM.

not aware of it - never discussed

Tel - had nothing to do. Event was some allergies to American Spirit Foundation nothing to pay for event. It was for other events.
Dined scenario and claimed that Mrs. Green had nothing to do with anything.

Pay through [illegible]

Would get [illegible]

Left some money [illegible] because they need money.
Field Office Acquiring Evidence: LA
Serial # of Originating Document: 10/31/01

Date Received:

From:
(Name of Contributor)

(Address of Contributor)

(City and State)

To Be Returned: Yes
Receipt Given: No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)
Federal Rules of Criminal Procedure

Federal Taxpayer Information (FTI)

Title:
New York Senate 2000
Campaign Finance Law V:01/01/00+25
00: LA

Reference:
(Communication Enclosing Material)

Description: Original notes re interview of
10/31/01
Hollywood Gala was retained by to benefit Mrs. Clinton.

To find venue was 1st problem (June/July 2000) mid to late July 2000 - 1st meetings (3 weeks to plan event)

1st Planning mtg - could not recall exact week
w/ SL. Ms - not lots of interaction was primary contact for seemed to be really involved. Went to along w/ L7 to discuss

L7 was very involved
- All aspects of event
- Was involved w/ NY Senate 2000 rep
- Brought in key supporters
- Acted on

Stan (putting on this event) - bring his company profile up - speculated

knows name left

was involved
Field Office Acquiring Evidence: LA

Serial # of Originating Document: __________

Date Received: 11/13/01

From: __________ (Name of Contributor)

(Address of Contributor): __________

City and State: Los Angeles

By: __________

To Be Returned: □ Yes □ No

Receipt Given: □ Yes □ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e)

Federal Rules of Criminal Procedure: □ Yes □ No

Federal Taxpayer Information (FTI): □ Yes □ No

Title: 8

New York Senate 2000

Reference: __________ (Communication Enclosing Material)

Description: □ Original notes re interview of

Date: 11/13/01

11/14/01

11/14/01
Address:
City:
Phone:
DOB:
SSAN:

Occupation:

Galia worked as ________

was doing ________

Responsible for the concert production.

Hired by ________ at request of ________

contact blnBlack Ink ________

Worked with ________ on a number of occasions.
Never participated in meetings about financial costs – was final cost for
never spent anything without approval. Didn’t know what role.

Stan Lee – Not at all.

Was aware of political needs to hire union personnel.

Gave an initial budget – was in contract was then given money to put on event. Bill approved by sent to and
she
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1421921-0

Total Deleted Page(s) = 3
Page 13 - b5; b6; b7C;
Page 15 - b5; b6; b7C;
Page 18 - b5; b6; b7C;

XXXXXXXXXXXXXXXXXXXXXXXX
X  Deleted Page(s)  X
X  No Duplication Fee  X
X  For this Page  X
XXXXXXXXXXXXXXXXXXXXXXXXXX
Universal Case File Number: 56c-LA-227506-1A19

Field Office Acquiring Evidence: LA

Serial # of Originating Document: 

Date Received: 2/27/02

From: (Name of Contributor)

(Address of Contributor)

By: (Name of Special Agent)

Los Angeles, CA (City and State)

To Be Returned: □ Yes □ No

Receipt Given: □ Yes □ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)

Federal Rules of Criminal Procedure: □ Yes □ No

Title: New York Senate 2,000

Company Finance Violations

601 LA

Reference: (Communication Enclosing Material)

Description: Original notes re interview of

2/27/02
Run company

look leave was intro to through friends around

started at SLM around until

was internet company that

reported to was the CEO
Richman - Philanthropist - met her at a Gore event. Doesn't

Stan Lee helped believe Lee was aware of activities Lee was

involved during meetings with didn't know about Gala details.

- See questionnaire sheet on

- had met Clinton previous

- was discussed convention

- was DNC people on event

- meet her at Sun.
Field Office Acquiring Evidence

Serial # of Originating Document

Date Received 01/10/02

From

(Name of Contributor)

(Address of Contributor)

By

(Name of Special Agent)

To Be Returned □ Yes □ No

Receipt Given □ Yes □ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6(e)

Federal Rules of Criminal Procedure □ Yes □ No

Title: New York Senate 2000 campaign finance violations

Reference: ________________________________________ (Communication Enclosing Material)

Description: Original notes re interview of
- Set mail invitations from New list to attend.

Wait to a early meeting W

Star Lee: media office

Lee: not moved except to add
Universal Case File Number: 560C-LA-227506
Field Office Acquiring Evidence: LA
Serial # of Originating Document: 
Date Received: 
From: CW
(Name of Contributor)
(Address of Contributor)
(City and State)
By: 
To Be Returned: Yes No
Receipt Given: Yes No
Grand Jury Material - Disseminate Only Pursuant to Rule 6 (c)
Federal Rules of Criminal Procedure: Yes No
Federal Taxpayer Information (FTI): Yes No
Title: New York Senate 2000 Campaign Finance Violations
Reference: (Communication Enclosing Material)
Description: Original notes re interview of CW meeting
- the knowledge of fundraising activities

- Composed in...
1. Stan sees claim victims & raises profile of SLN.

2. Cynthia is money behind my wealth.

3.
Universal Case File Number: 561-LA-227506
Field Office Acquiring Evidence: LA
Serial # of Originating Document: 
Date Received: 12/20/04
From: (Name of Contributor)
(Address of Contributor)
(City and State)
By: 

To Be Returned: □ Yes  □ No
Receipt Given: □ Yes  □ No
Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)
Federal Rules of Criminal Procedure: □ Yes  □ No
Federal Taxpayer Information (FTI): 
Title: □ Yes  □ No

Reference: (Communication Enclosing Material)

Description: X Original notes re interview of

[Handwritten note: Please return this file]
Precedence: ROUTINE

To: Los Angeles

From: Los Angeles

WCC-6

Contact: SA

Approved By: 

Drafted By: 

Case ID #: 56C-LA-227506 (Pending)

Title: et al;

NEW YORK SENATE 2000;
CAMPAIGN FINANCE VIOLATIONS;
OO: LOS ANGELES

Synopsis: To request reimbursement of in expenses for the above captioned investigation.

Details:

AMOUNT IN CASE FUND
(FOR CURRENT FISCAL YEAR): $ 

DATE OF LAST ROLLOVER AUTHORITY
IN CURRENT FISCAL YEAR:

AMOUNT OF THIS REQUEST: $ 

BALANCE REMAINING IN CASE FUNDS: $

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable
To: Los Angeles  From: Los Angeles
Re: 56C-LA-227506, 11/12/2002

proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed. Following the failure of SLM, a number of FBI and SEC investigations were opened. In

is currently in In addition, is

The Los Angeles Division investigation has revealed that NEW YORK SENATE 2000 deliberately undervalued the in-kind contributions made by and SLM in staging the GALA. In filings to the Federal Election Commission, NEW YORK SENATE 2000 claimed in-kind contributions of expenses for the GALA of approximately $500,000. However, the investigation has uncovered the true value of the in-kind contributions to be more than one $1 million. As a result, NEW YORK SENATE 2000 distributed prohibited federal or "hard money" proceeds of more than $200,000 to the HILLARY CLINTON FOR UNITED STATES SENATE campaign. In addition, the investigation has revealed that

In addition, investigation has also revealed other irregularities in the committee's FEC filings. Another event sponsored by and SLM that was held in June 2000 does not appear to have been disclosed or reported at all.

was closely involved in the planning of the GALA. He spent several weeks at the offices of SLM, has allegedly made statements In addition, also

On a cooperating witness (CW) was proffered by the reporting agent in Washington D.C.. The CW is During these proffer
Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable
proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed. Following the failure of SLM, a number of FBI and SEC investigations were opened. In the early

The Los Angeles Division investigation has revealed that NEW YORK SENATE 2000 deliberately undervalued the in-kind contributions made by [redacted] and SLM in staging the GALA. In filings to the Federal Election Commission, NEW YORK SENATE 2000 claimed in-kind contributions of expenses for the GALA of approximately $500,000. However, the investigation has uncovered the true value of the in-kind contributions to be more than one $1 million. As a result, NEW YORK SENATE 2000 distributed prohibited federal or "hard money" proceeds of more than $200,000 to the HILLARY CLINTON FOR UNITED STATES SENATE campaign. In addition, the investigation has revealed that

In addition, investigation has also revealed other irregularities in the committee's FEC filings. Another event sponsored by [redacted] and SLM that was held in June 2000 does not appear to have been disclosed or reported at all.

[redacted] was closely involved in the planning of the GALA. He spent several weeks at the offices of SLM. [redacted] has allegedly made statements

In addition, also

On [redacted] a cooperating witness (CW) was proffered by the reporting agent in Washington D.C.. The CW is

During these proffer
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1421921-0

Total Deleted Page(s) = 1
Page 1 ~ b6; b7C; b7D; b7E;

XXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s)   X
X No Duplication Fee X
X For this Page     X
XXXXXXXXXXXXXXXXXXXXXXXX
In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million dollars for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON UNITED STATES SENATE CAMPAIGN and the DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE.

The GALA was hosted by comic book legend STAN LEE and his of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed. Following the failure of SLM, a number of FBI and SEC investigations were opened. In currently in who is

Investigation has revealed that NEW YORK SENATE 2000 deliberately undervalued the in-kind contributions made by and SLM in staging the GALA. In filings to the Federal Election Commission, NEW YORK SENATE 2000 claimed in-kind contributions for the GALA of approximately $400,000. However, the investigation has uncovered the true value of the in-kind contributions to be over one million dollars. As a result, NEW YORK SENATE 2000 distributed prohibited federal or "hard money" proceeds of over $200,000 to the HILLARY CLINTON FOR UNITED STATES SENATE campaign and the DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE.

In addition, investigation has also revealed other irregularities in the committee's FEC filings. Another event sponsored by and SLM, that was held in June 2000, does not appear to have been disclosed or reported at all.
FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1421921-0

Total Deleted Page(s) = 1
Page 4 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXX
X             Deleted Page(s)   X
X              No Duplication Fee X
X           For this Page       X
XXXXXXXXXXXXXXXXXXXXXXXXXXX
Synopsis: Request to serve enclosed Federal Grand Jury subpoena.

Enclosure(s): For San Francisco, are the original and one copy of Federal Grand Jury subpoena for [Redacted].

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was believed to be a rising star in the emerging Internet media market. However, several months after the GALA, SLM failed.
Precedence: ROUTINE

Date: 03/19/2003

To: Chicago

Attn: WC-3

SSA

From: Los Angeles

WCC-4

Contact: SA

Approved By: 

Drafted By: 

Case ID #: 56C-LA-227506-GJ (Pending)

Title: NEW YORK SENATE 2000; Campaign Finance Violations; OO: LOS ANGELES

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

Synopsis: Request to serve enclosed Federal Grand Jury subpoena.

Enclosure(s): For Chicago are the original and one copy of Federal Grand Jury subpoena for 

Details: In August 2001, the Los Angeles Division began a full field investigation into allegations that NEW YORK SENATE 2000, a joint fund-raising committee affiliated with HILLARY CLINTON's United States Senate Campaign, violated federal campaign finance laws. Specially, these allegations center around a fund-raising event held on August 12, 2000 in Los Angeles, California. The event was called "THE HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON" (GALA). It was held just prior to the Democratic National Convention at the home of a wealthy radio executive named KEN ROBERTS. The GALA featured numerous entertainment celebrities such as CHER, TONI BRAXTON, SHIRLEY MACLAINE, and DIANA ROSS in a concert followed by a sit down dinner. This event raised approximately $1 million for NEW YORK SENATE 2000. NEW YORK SENATE 2000 then distributed allowable proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was