



U.S. Department of Justice

Federal Bureau of Investigation
Washington, D.C. 20535

September 3, 2021

JOHN R. GREENEWALD, JR.
SUITE 1203
27305 WEST LIVE OAK ROAD
CASTAIC, CA 91384-4520

Request No.: 1423456-000
Subject: LIEBER, STANLEY MARTIN

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 foipaquestions@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,

A handwritten signature in dark ink, appearing to read "M. G. Seidel", with a stylized flourish at the end.

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(i)(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) (A) 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 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.

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>**

Indices: ☐ Negative ☐ See below

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b7C

**U.S. Department of Justice**

*United States Attorney
Eastern District of New York*

*One Pierrepont Plaza
Brooklyn, New York 11201*

*Mailing Address: 147 Pierrepont Street
Brooklyn, New York 11201*

FOR IMMEDIATE RELEASE

Contact:

June 12, 2001

United States Attorney's Office

U.S. Postal Inspection Service

Federal Bureau of Investigation

b6
b7c**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

EOC:KMB
F.#2001R01036

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

WEXLER, J.

BOYLE, M.J.

INDICTMENT
CR 01 636

Cr. No.

(T. 15, U.S.C.,

§§ 78j(b) and 78ff;

T. 18, U.S.C., §§ 371,

2 and 3551 et seq.)

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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FOI/PA# 1421921-0

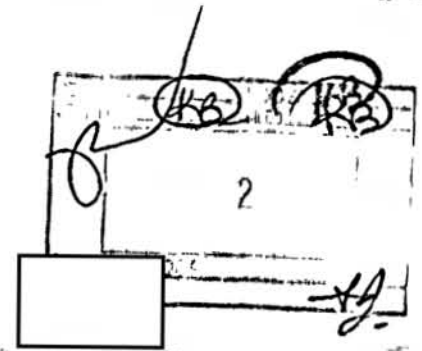
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Page 14 ~ Duplicate;
Page 16 ~ Duplicate;

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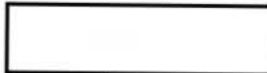
196c-MY-278814-~~3~~
-63

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BY _____
DATE _____



see 1A6

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- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/10/01

[redacted]
[redacted] 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 [redacted] United States Postal Inspector [redacted] and Special Agent [redacted] Representing [redacted] were [redacted] and [redacted]

[redacted] provided the following information:

[redacted] graduated from [redacted]
His employment began at [redacted]

[redacted] was approached by [redacted]

[redacted] recalled [redacted]

[redacted] STAN LEE and

[redacted] met with [redacted]

[redacted] advised that [redacted]

[redacted] was [redacted]

[redacted] office [redacted]

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

File # 196C-NY-278884

Date dictated 8/10/01

by SA [redacted]

196C-NY-278884

Continuation of FD-302 of

[Redacted]

On 8/8/01

Page

4

[Redacted]

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[Redacted]

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impression from [Redacted] that [Redacted]

[Redacted]
STAN LEE was the Chief Creative writer and worked daily at SLM

[Redacted]

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[Redacted]

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196C-NY-278884

Continuation of FD-302 of [redacted]

. On 8/8/01

. Page 6

[redacted]

[redacted]

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[redacted] stated that [redacted]

[redacted]

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[redacted] advised [redacted]

[redacted]

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[redacted] recalled at a SLM [redacted]

[redacted]

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[redacted] was told by either STAN LEE or [redacted]
[redacted] that [redacted]
[redacted] STAN LEE was reimbursed [redacted]

318e-ny-2788p4 main 124

SEARCHED	INDEXED
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MAY 24 2005	
NEW YORK	

UPLOADED

WITH/TEXT ☒
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BY VB
DATE 6/2/05

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10

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 05/23/2005

To: New York

From: New York

C-28, LIRA

Contact: SA [REDACTED]

Approved By [REDACTED]

Drafted By: [REDACTED]

Case ID #: 318C-NY-278884 ✓

Title: [REDACTED]

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 [REDACTED] 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:

Name

Date of Interview

7/15/04

7/12/04

7/12/04

7/12/04

7/13/04

Stan/Lee

7/14/04

7/15/04

7/13/04.

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1A6

Universal Case File Number

196C-NY-227884-301

Field Office Acquiring Evidence

NYO

Serial # of Originating Document

636

Date Received

8/8/01

From

(Name of Contributor)

(Address of Contributor)

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(City and State)

By

SA

To Be Returned ☐ Yes☒ NoReceipt 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

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Please do not remove
this slip from exhibit.
NY 100-78854-1A6

*Interview pursuant to a Proffer
Agreement - EDNY.*

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met at The office of Stan Lee. ! J

- Stan Lee Media

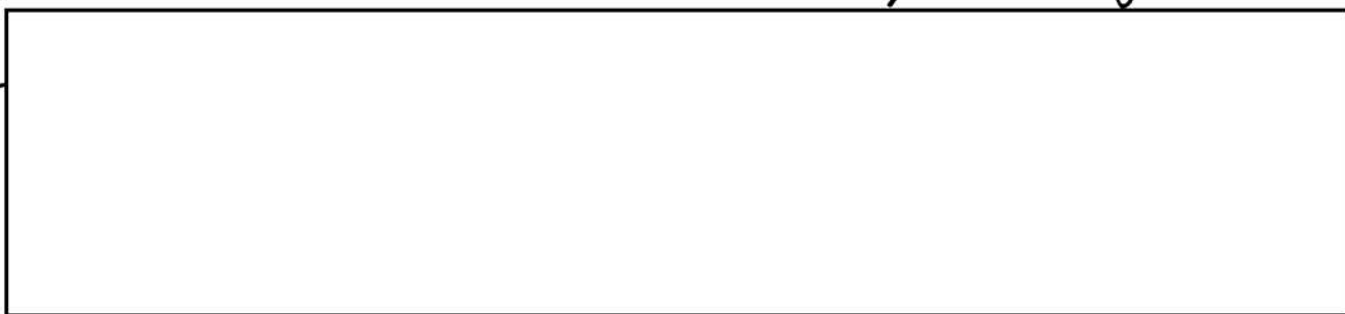
Stan Lee was selling content -

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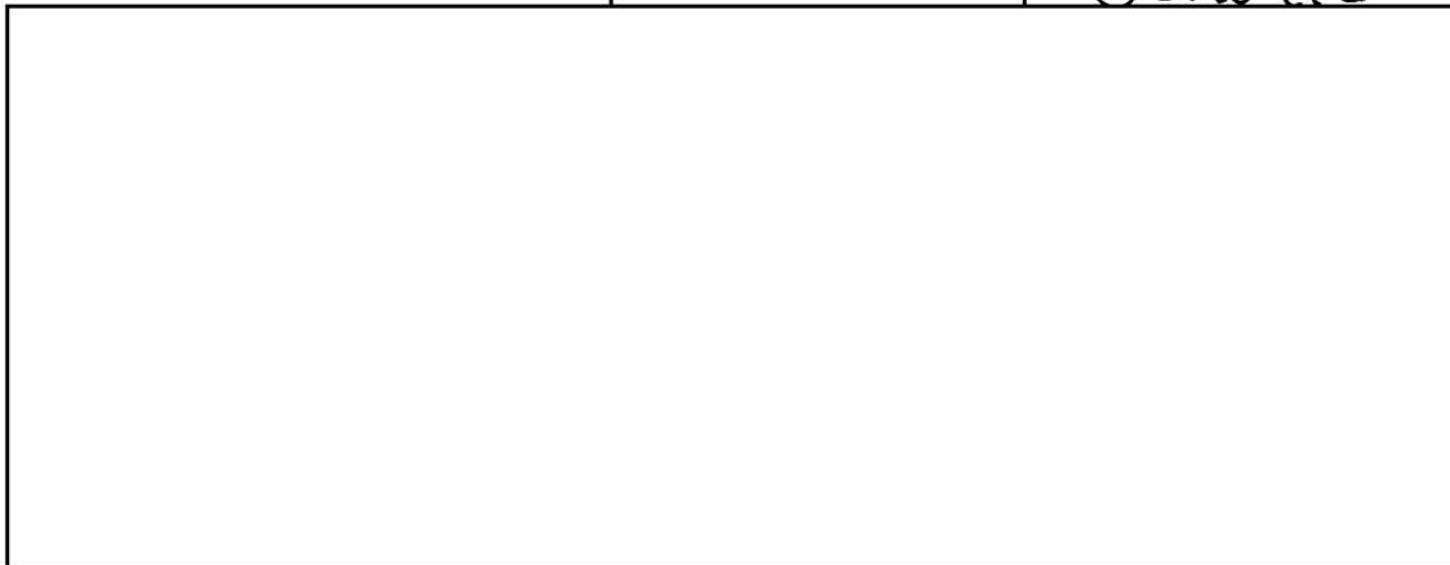
The Stan Lee Media site - initially had little
activity games, letters from Stan Lee - [redacted]

- Stan Lee Media was exploring [redacted]

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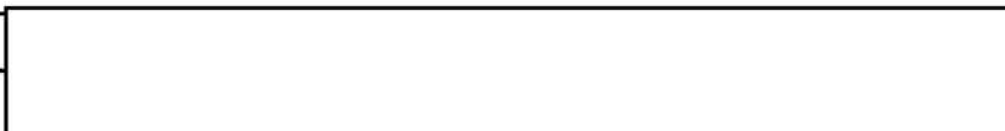
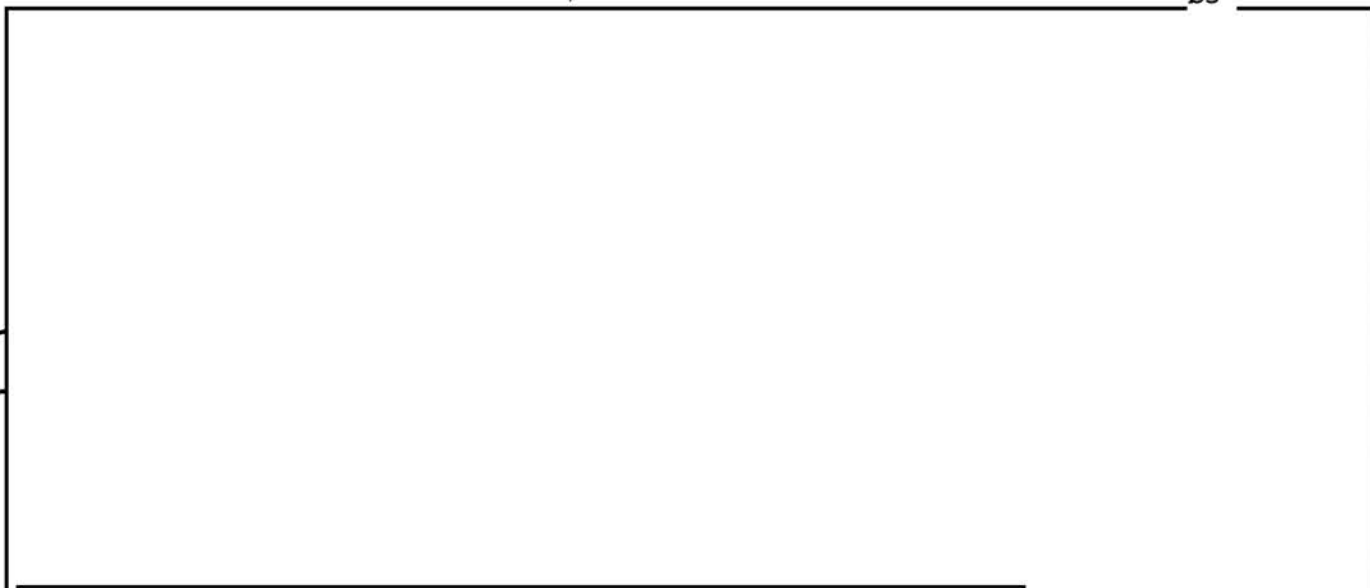
- (S) Staw Cre



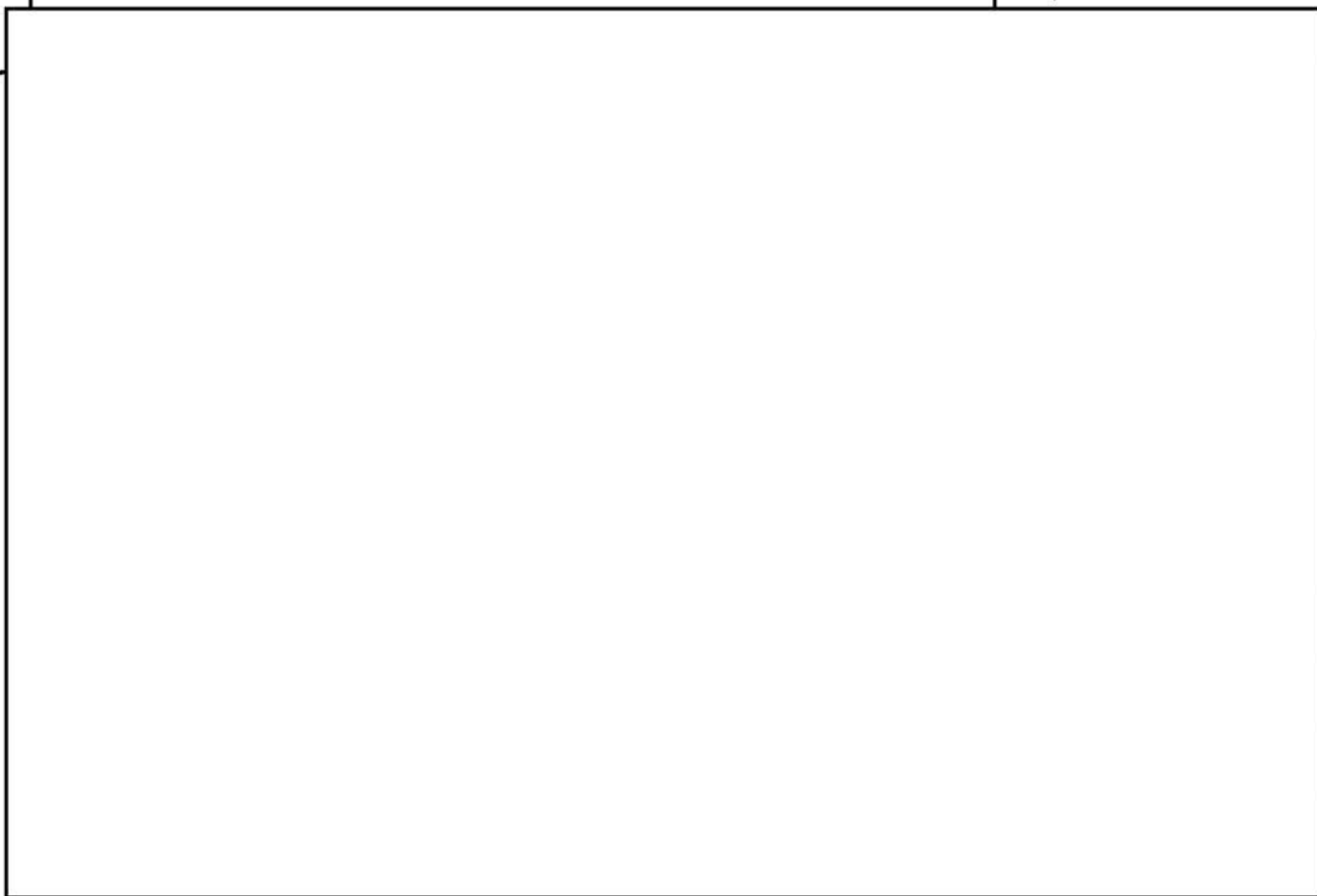
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Stan Lee

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by Stanley



[REDACTED]

Stan Lee - worked daily - Chief Creative writer - writing scripts.

[REDACTED]

[REDACTED]

[REDACTED] Stan Lee was running that company

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

at Stan Lee's offices

on several occasions

[REDACTED]

[REDACTED]

- not aware of Stan Lee Media's

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] was
reminded [REDACTED]

[REDACTED]

[REDACTED]

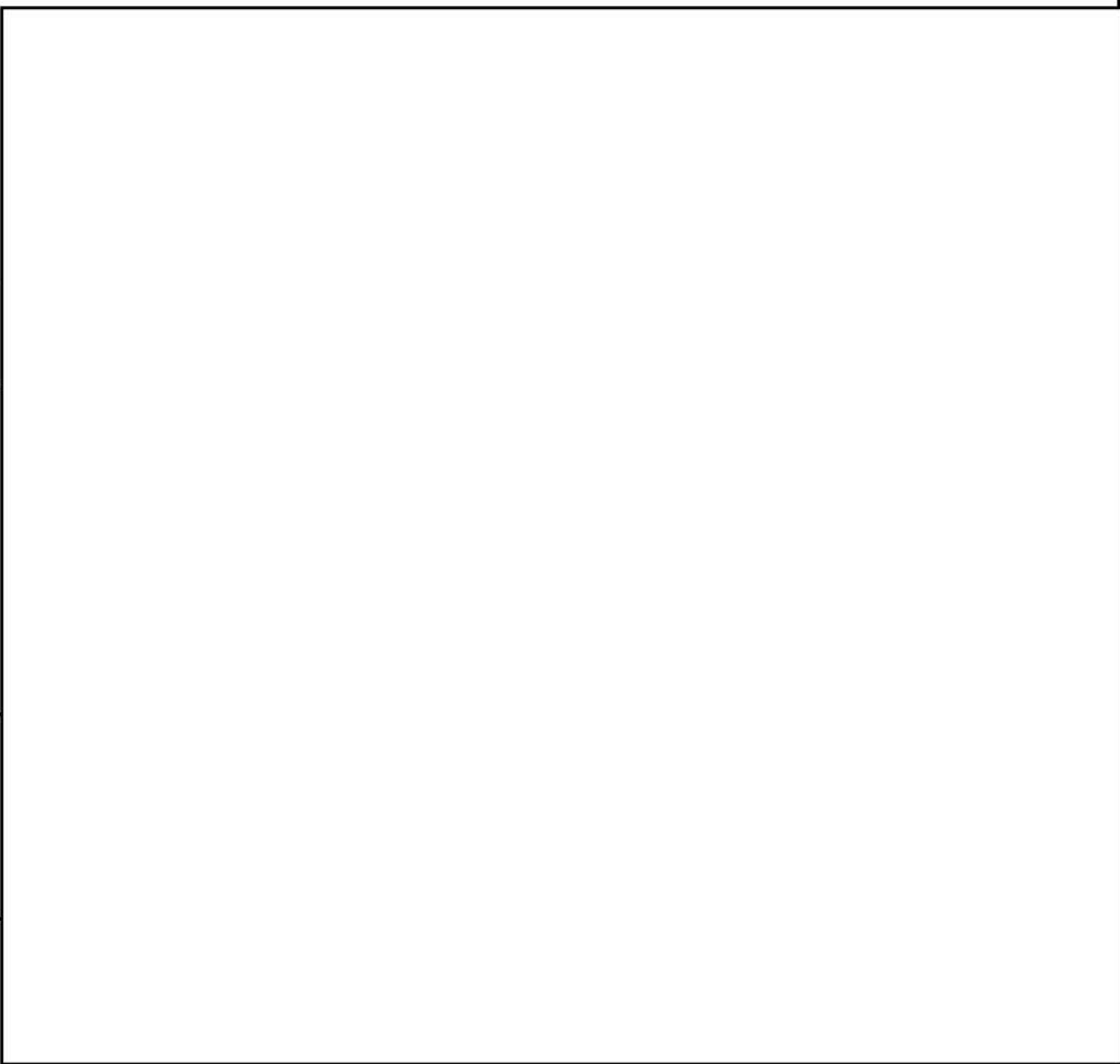
[REDACTED] because Stan Lee should not
to create liquidity [REDACTED]

[REDACTED]

Stan Lee goal was to License There product over
sees - [REDACTED]

[REDACTED]

1
2
1
1
1
1



1 [redacted]

[redacted] If Stan Lee was attached to certain things it would get visibility.

[redacted]

w/ Stan Lee.

[redacted]

- asked at a board meeting ~~per~~.

[REDACTED]

[REDACTED]

Stan Lee

[REDACTED]

[REDACTED]

[REDACTED] suppose to be a personal contribution
by Stan Lee. - Stan Lee reimburse the
company - And Stan or [REDACTED]

[REDACTED]

[REDACTED]

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By
Stan Lee

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Like Stan Lee

[Redacted]

In Stan Lee

[Redacted]

[Redacted]

[Redacted]

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[REDACTED]

[REDACTED]

[REDACTED] Stan & [REDACTED]

[REDACTED]

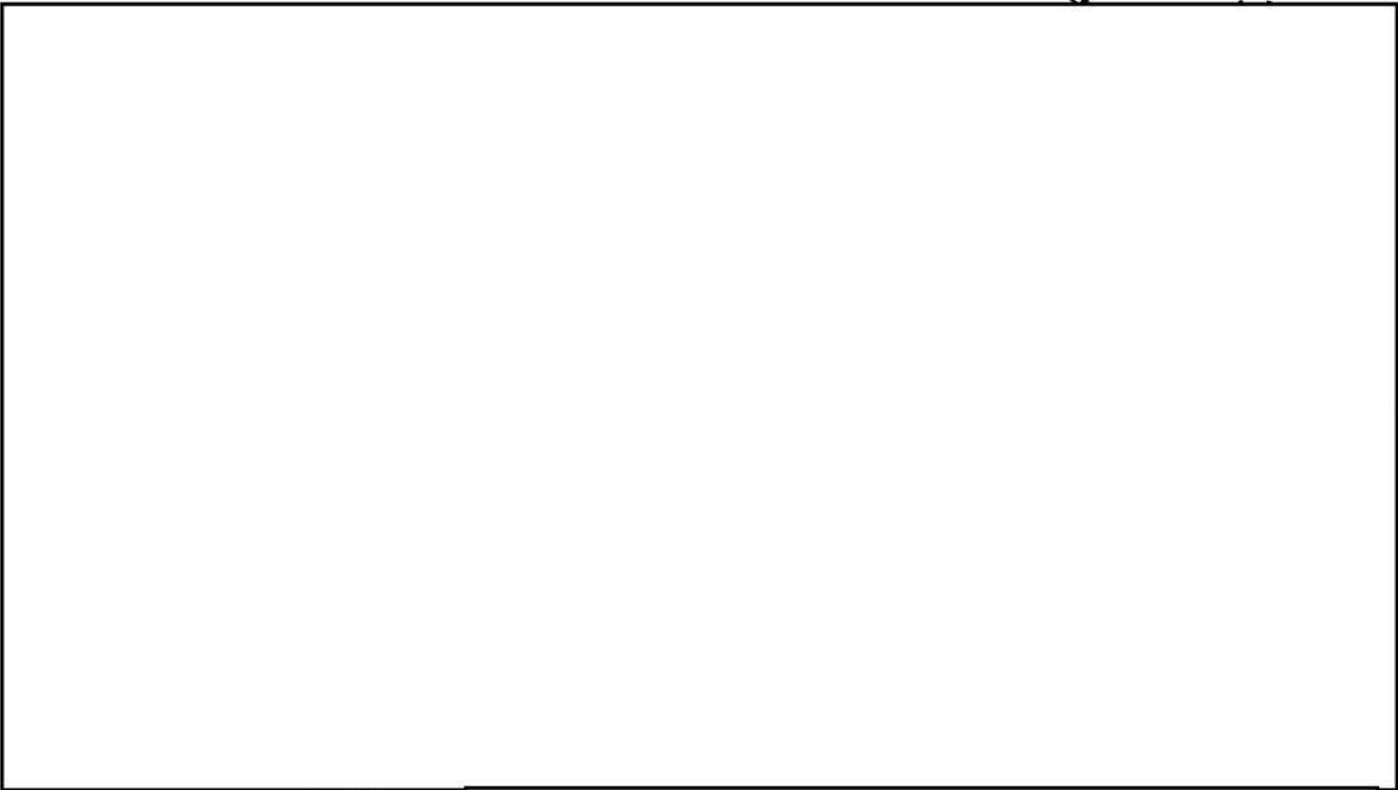
[REDACTED]

[REDACTED]

[REDACTED] because Stan Lee would have had to file for
Bankruptcy.

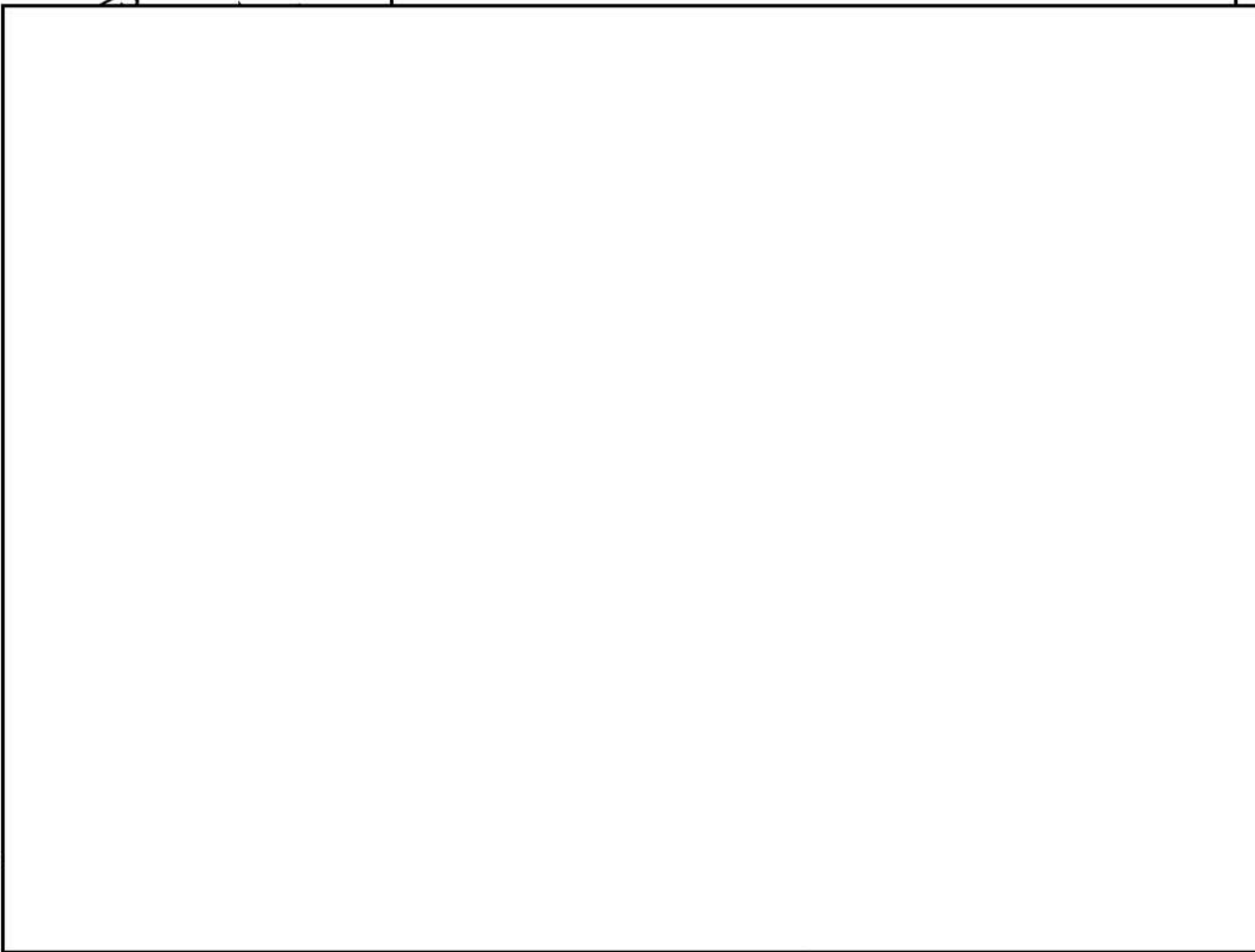
[REDACTED]

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(4)

- Stan had ^{had} wanted



4/18/74

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- Stan told

[REDACTED]

[REDACTED]

[REDACTED]

300

FD-340 (Rev. 4-11-03)

File Number

318C-NY-278884

Field Office Acquiring Evidence

NYO

1A26

Serial # of Originating Document

Date Received

7/15/04

From

see below

(Name of Contributor/Interviewee)

(Address)

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:

[Redacted]

etc

Reference:

(Communication Tracking Material)

Description: ☒ Original notes re interview of

Name

Date of Interview

[Redacted]

7/15/04

7/12/04

7/12/04

7/12/04

7/13/04

Stan Lee

[Redacted]

7/14/04

7/15/04

7/15/04

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Please do not remove
this slip from exhibit

NY# 278884 1726

LA
J. E. J.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted] was asked if they

[Redacted]

1st

[Redacted]

Sum - did not want to

[Redacted]

[Redacted]

[Redacted]

[Redacted]

11/2/04

Fax

proe-

met

Through

stock FN SLM -

That They

Stayed at SLM in hopes of

-went to

2

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~~Believes~~ [redacted] SLM with
[redacted] - Stan Lee was Trusting.
[redacted] would

say

[redacted]

[redacted] was [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

LA

[Redacted]

[Redacted]

[Redacted]

- went

TO Stan Lee -

[Redacted]

to SLM

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- when SLM was

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Stan Lee Media

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

②
[redacted] of SLM - [redacted]
[redacted] The company - SLM -
[redacted] - Stan Lee was
just the creator

[redacted]

[redacted] (Stan Lee wanted to do
something for the artist) - Stan Lee confronted
[redacted]

[redacted]

- Just before the end of SLM - [redacted]

[redacted]

[redacted]

[redacted]

[redacted]



9440 Santa Monica Blvd.
Suite 620
Beverly Hills, CA 90210

(310) 275-9933
Fax (310) 285-9955

Stan Lee
via phone

b6
b7C

to Stan Lee

- Marvel - Income

- SLM - was 1st call Stan Lee Entertainment.

- Stan Lee never gave

- SLM-

- told Lee

21

b6
b7C

[Redacted]

[Redacted]

- Never heard of Eugene Walker

[Redacted]

[Redacted]

[Redacted]

[Redacted]

suggested to Lee

[Redacted]

[Redacted]

[Redacted]

[Redacted]

(2)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Intro. to Stan Lee

[REDACTED]

[REDACTED]

[REDACTED]

told stan

[REDACTED]

[REDACTED]

- Stan was not aware that

[REDACTED]

[REDACTED]

- Stan found out

[REDACTED]

(4)

b6
b7C

- Lee believed

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Lee did not focus on the

[redacted]

CA ⑥

b6
b7C

7/18/04

of 32m.

at SLM

- SLM

related to

The SLM Bankruptcy

Currently



~~X~~

[Redacted]

[Redacted]

w/SLM-

[Redacted]

[Redacted]

SLM-

[Redacted]

for SLM

[Redacted]

[Redacted]

complained to Stan Lee

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Stan Lee told her to

[Redacted]

- [Redacted]

[Redacted]

[Redacted]

LSA

b6
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11/15/04

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

SLM offices

[Redacted]

[Redacted]

[Redacted]

w/ Steele

[Redacted]

[Redacted]

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 07/02/2001

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

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

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

[redacted]
[redacted]
[redacted] because he had a [redacted]

Investigation on [redacted] at [redacted] California (telephonically)

File # 196C-LA-226637 - 2 Date dictated _____

by SA [redacted] *RJA*

196C-LA-226637

Continuation of FD-302 of [REDACTED]

, On [REDACTED]

Page 2

b6
b7C
b7D

[REDACTED]

[REDACTED] provided interviewing agent with [REDACTED]

[REDACTED]

b6
b7C
b7D

At some point after [REDACTED]

[REDACTED] and [REDACTED] realized that [REDACTED]

[REDACTED] questioned [REDACTED] about [REDACTED]

and [REDACTED] said that [REDACTED]

[REDACTED] statement and [REDACTED]

agreed to [REDACTED]

SLM later determined that

there were [REDACTED]

[REDACTED] may have been present for one or more of these exchanges between [REDACTED] and [REDACTED] who handled

[REDACTED] also may have been present. The same is true for [REDACTED]

b6
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[REDACTED] through [REDACTED] of SLM along with STAN LEE, who was then working for the company as an outside consultant. [REDACTED]

[REDACTED] by a friend of [REDACTED] from

[REDACTED] named [REDACTED]

b6
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b7D

[REDACTED] SLM did enter into talks about the possibility of [REDACTED]

[REDACTED]

196C-LA-226637

Continuation of FD-302 of [REDACTED]

, On [REDACTED]

, Page 5

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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 [REDACTED]

[REDACTED]

[REDACTED] has since determined that the [REDACTED] were controlled by [REDACTED] and [REDACTED]

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[REDACTED] 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 [REDACTED] mother who has been deceased for years.

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

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[REDACTED]

After [REDACTED] began to [REDACTED] regarding the [REDACTED] engaged in a number of activities [REDACTED] Initially, in contrast to [REDACTED] usual habit of [REDACTED]

b6
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b7D

[REDACTED] discovery occurred in the middle of [REDACTED]

After the discovery of [REDACTED]

b6
b7C
b7D

[REDACTED]

196C-LA-226637

Continuation of FD-302 of [REDACTED]

, On [REDACTED]

, Page 6

[REDACTED]
[REDACTED] stated that he had [REDACTED] because he was [REDACTED]
[REDACTED]
[REDACTED] said that the [REDACTED]
[REDACTED]

b6
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[REDACTED]
[REDACTED] discussed the situation with [REDACTED] denied knowledge of [REDACTED]
[REDACTED] then [REDACTED]
[REDACTED] When [REDACTED] comments were
related to [REDACTED] told [REDACTED] that [REDACTED] was
[REDACTED] were performed at the
instruction of [REDACTED] It was at this point that [REDACTED] indicated
[REDACTED]

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

b6
b7C
b7D

[REDACTED]
[REDACTED] told [REDACTED] that [REDACTED] had been [REDACTED]
[REDACTED]

After [REDACTED] finished speaking with [REDACTED]
contacted [REDACTED] then contacted counsel for
[REDACTED] and informed [REDACTED] that [REDACTED] did not
[REDACTED]
[REDACTED] After this conversation,
[REDACTED] provided [REDACTED] with documentation relating to his
[REDACTED]

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b7D

[REDACTED] On the
[REDACTED] immediately following [REDACTED]
[REDACTED]

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b7D

196C-LA-226637

Continuation of FD-302 of [REDACTED]

, On [REDACTED]

, Page

8

b6
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In addition to the [REDACTED]
[REDACTED] also discovered [REDACTED] in which [REDACTED]
[REDACTED] confronted [REDACTED]
about [REDACTED]

The problems concerning [REDACTED]
[REDACTED] had with
[REDACTED] When [REDACTED] was effectively
the [REDACTED] of SLM. Despite the fact that he held
no official position with SLM and that his actual title was that of
an [REDACTED] was the person who was [REDACTED]
[REDACTED] for the company. This was
largely a function of the fact that [REDACTED] was [REDACTED] of SLM
and SLM's [REDACTED] of the SLM stock.
[REDACTED] problems with [REDACTED] because
[REDACTED]
[REDACTED] input in the company. Even after [REDACTED]
[REDACTED] continued
to exert his influence over the company. It was not until [REDACTED]
[REDACTED] was [REDACTED]
[REDACTED] that [REDACTED] began to [REDACTED]

b6
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b7D

[REDACTED]
[REDACTED] President WILLIAM
JEFFERSON CLINTON and his wife, HILLARY CLINTON. Sometime in the
middle of 2000, [REDACTED] SLM to fund HILLARY CLINTON's
campaign for the United States Senate. [REDACTED] began [REDACTED]
hosting a tribute to PRESIDENT CLINTON and donating the proceeds
from the event to HILLARY CLINTON's Senate campaign. Despite
[REDACTED]

b6
b7C
b7D

[REDACTED] had [REDACTED] that SLM
was going to fund the entire HOLLYWOOD SALUTE TO PRESIDENT WILLIAM
JEFFERSON CLINTON. [REDACTED]
[REDACTED] telling [REDACTED] there was [REDACTED]
[REDACTED] At this point, [REDACTED] told [REDACTED]
[REDACTED]
[REDACTED] by [REDACTED] and STAN LEE. [REDACTED] said that SLM was not going
to [REDACTED]
[REDACTED] understanding that [REDACTED]
[REDACTED]

196C-LA-226637

Continuation of FD-302 of [REDACTED]

, On [REDACTED]

, Page

9b6
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[REDACTED] for the [REDACTED] but [REDACTED] never [REDACTED]

At the time that [REDACTED]

When [REDACTED] asked

[REDACTED] said that the [REDACTED] STAN LEE,
and that LEE would [REDACTED] later
confirmed with [REDACTED] that LEE did [REDACTED]
[REDACTED] also told [REDACTED]

b6
b7C
b7D

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

b6
b7C
b7D

[REDACTED] is aware of [REDACTED]
information relating to the activities engaged in by [REDACTED] and
[REDACTED] had an [REDACTED]
[REDACTED] also is aware of [REDACTED]

b6
b7C
b7D

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 07/02/2001

[redacted]
[redacted] California, telephone number [redacted]
[redacted] was contacted at his place of business. After being advised of the identity of the interviewing agent and the purpose of the interview, [redacted] provided the following information:

b6
b7C

[redacted] is a [redacted] In late [redacted]
[redacted] was referred by an associate named [redacted]
[redacted] to a client named [redacted] also works at [redacted]
[redacted] was an [redacted] at STAN LEE MEDIA (SLM)
and wanted to [redacted] to [redacted]
[redacted] believes that he was [redacted] SLM on or shortly before [redacted]
[redacted] because it was on that date that [redacted] sent [redacted]
[redacted] Although [redacted] was [redacted]
[redacted] he never received any payment from SLM. After a short time -- approximately [redacted]
[redacted] of SLM was [redacted]
[redacted]

b6
b7C

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

b6
b7C

During the course of [redacted] of SLM, [redacted]
[redacted] opened a dialogue with [redacted]
[redacted]

b6
b7CInvestigation on 07/02/2001 at Los Angeles, California (telephonically)File # 196C-LA-226637 -3 Date dictated _____by SA [redacted] *KMA*b6
b7C

196C-LA-226637

Continuation of FD-302 of [REDACTED]

, On [REDACTED]

, Page

2

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

b6
b7C

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

b6
b7C

[REDACTED] provided interviewing agent with a copy of [REDACTED]
[REDACTED] These documents are being maintained along with this file.

FEDERAL BUREAU OF INVESTIGATION

Precedence: DEADLINE 03/21/2002

Date: 02/21/2002

To: San Francisco

SPECIAL

From: Los Angeles

WCC-4

Contact: SA [REDACTED]

Approved By: [REDACTED]

Drafted By: [REDACTED]

kjh

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

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b7C
b7E

Title: STAN LEE MEDIA;

[REDACTED]
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]

b6
b7C

[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]

b6
b7C

[REDACTED] and EUGENE "E.D." WALKER

b6
b7C

[REDACTED] or WALKER.

OS2KJH01.02

196C-LA-226637-29

2bE01V

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 06/27/2002

[redacted] date of birth [redacted] social security account number [redacted] work address [redacted] Los Angeles, CA 90025, work telephone number [redacted] cellular telephone number [redacted] California State Bar number [redacted] was interviewed at the United States Attorney's Office, 312 N. Spring Street, Los Angeles, CA. Assistant United States Attorney (AUSA) [redacted] and AUSA [redacted] were present during the interview. After being advised of the identity of the interviewing agent and the nature of the interview, [redacted] provided the following information:

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b7C

[redacted] advised that as an attorney he [redacted] graduated from [redacted] and worked there until [redacted] has practiced law [redacted].

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b7C

During January 1999, [redacted] was contacted by a [redacted] person named [redacted] suggested that [redacted] contact [redacted] because [redacted] was [redacted].

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b7C

[redacted] initial meeting was with [redacted] and [redacted] and [redacted] were [redacted].

b6
b7C

[redacted] advised that Stan Lee was not involved in the financial aspects of Stan Lee Media (SLM). [redacted] and [redacted] 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. [redacted] believed that SLM could not [redacted]. In addition, [redacted] and [redacted].

b6
b7CInvestigation on 06/26/2002 at Los Angeles, CAFile # 196C-LA-226637-42

Date dictated _____

by SA [redacted] *PP*b6
b7C

196C-LA-226637

Continuation of FD-302 of [REDACTED]

, On 06/26/2002 , Page 6

b6
b7C

[REDACTED] advised that [REDACTED] was [REDACTED] of Eat Time Media while the [REDACTED] of Mondo English was a Mexican gentlemen. [REDACTED] could not remember the name of the [REDACTED] of Mondo English. [REDACTED] advised that around [REDACTED] and [REDACTED] were going to [REDACTED] [REDACTED] could not remember the [REDACTED] name but stated that the [REDACTED]

[REDACTED] advised that all of the SLM stock that [REDACTED] told [REDACTED] that he [REDACTED]

b6
b7C

During [REDACTED] had discussions with [REDACTED] and [REDACTED] regarding the [REDACTED] advised that [REDACTED] and himself.

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

b6
b7C

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

b6
b7C

[REDACTED] told [REDACTED] about his [REDACTED] [REDACTED] told [REDACTED] that he had [REDACTED] [REDACTED] advised that as far as he knew, [REDACTED] [REDACTED] advised that Macro Media (specifically Macro Media's [REDACTED])

b6
b7C

[REDACTED] advised that he never heard of employees at SLM complaining because they couldn't sell their SLM stock. [REDACTED] advised that around February/March 2000 the SLM stock price increased to around \$25 to \$30 per share. Around July 2000, the

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Continuation of FD-302 of

[REDACTED]

, On 06/26/2002 , Page 8

b6
b7C

[REDACTED] advised that at least on two occasions he told [REDACTED]
and [REDACTED]
advised that he [REDACTED]
[REDACTED]

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 05/20/2002

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

From [redacted] was employed at STAN LEE MEDIA ("SLM") as [redacted] [redacted] was working for the [redacted] [redacted] Prior to joining SLM, [redacted] had spent [redacted]

When [redacted] started working for [redacted] he was a [redacted] 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. [redacted] was involved in many different projects and he never threw anything away. [redacted] In addition to [redacted] relating to SLM, [redacted] also created [redacted] with which [redacted] including 112 INTERACTIVE, EXCELSIOR PRODUCTIONS, HOLLYWOOD HOLDINGS, CYBERIA, CONTINENTAL ENTITIES, and possibly several others. [redacted]

[redacted] for [redacted] companies. [redacted] was [redacted] all of these companies. [redacted] also saw a [redacted] 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 [redacted] believed that all of these companies were interchangeable and that they were all involved in the same business. [redacted] was involved with MONDO ENGLISH. [redacted] occupied an office at SLM. [redacted] and [redacted] were also involved in the language

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

File # 196C-LA-226637-50

Date dictated _____

by SA [redacted] *KJA*

196C-LA-226637

Continuation of FD-302 of [REDACTED]

, On 05/18/2002 , Page 6

b6
b7C

[REDACTED]
[REDACTED] is not planning to do [REDACTED]
[REDACTED]

[REDACTED] does not want to believe that [REDACTED] and [REDACTED] set out with the idea of robbing SLM. Rather, [REDACTED] believes that they wanted the company to succeed, but they got into some bad situations and made it worse with bad choices. [REDACTED] is not aware of other fraudulent allegations that have been made against [REDACTED] and/or [REDACTED] in relation to business dealings that they had prior to SLM.

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[REDACTED] thinks that [REDACTED] had a great [REDACTED] and that he hired the best of the best. The problem is that nobody did their jobs properly. The other problem is that [REDACTED] and the company were focused on so many different projects, that they were never able to succeed at any one of them.

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b7C

[REDACTED] spoke to both [REDACTED] and [REDACTED]. [REDACTED] said that the company failed because [REDACTED] understood that [REDACTED] was talking about [REDACTED]. [REDACTED] did not mention [REDACTED] on [REDACTED]. [REDACTED] also did not mention the [REDACTED] made to SLM or the [REDACTED] and on SLM's behalf. [REDACTED] also said that [REDACTED]. [REDACTED] said that the things that went wrong were the fault of [REDACTED].

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b7C

[REDACTED]
[REDACTED] is aware that the [REDACTED] was an employee of [REDACTED] who also worked on [REDACTED] thought that either [REDACTED] or SLM was contributing to CLINTON's Senate campaign. Later, [REDACTED] heard that [REDACTED] STAN LEE in order to make the contribution.

b6
b7C

[REDACTED] and [REDACTED] did not get along. [REDACTED] tried to [REDACTED] but [REDACTED] does not think that she ever succeeded.

196C-LA-226637

Continuation of FD-302 of [redacted], On 05/18/2002, Page 7

[redacted] Other than the salary to which she was entitled, [redacted] never received anything of value from [redacted] or [redacted]

b6
b7C

[redacted] from [redacted]
[redacted]
but [redacted] refused [redacted]

[redacted] has received [redacted] telephone call from [redacted]
[redacted] said that [redacted]
[redacted]

b6
b7C

[redacted] provided interviewing agents with several items relating to [redacted]

b6
b7C

Universal Case File Number 196C-LA-226657-1A12Field Office Acquiring Evidence LASerial # of Originating Document 49Date Received 07/10/2002From STAN LEE
(Name of Contributor)

(Address of Contributor)

(City and State)

By SA
(Name of Special Agent)To Be Returned ☐ Yes ☒ NoReceipt Given ☐ Yes ☒ No

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

Federal Rules of Criminal Procedure

☐ Yes ☒ No

Title:

SLMReference: _____
(Communication Enclosing Material)Description: ☒ Original notes re interview ofSTAN LEE10-8-02
CS
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b7c

196C-LA-

310-586-8186

226637

1A 12

7/10/02

b6
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STAN LEE

BACKGROUND

Met

- TO GIVE SL AN AWARD

- ATTENDED DINNER - SAT OPPOSITE Ron Reagan

- IMPRESSED w/

- Sought SL to SL Agreed

- SL problems w/ MARVEL - Agreed to let him do other things

said

SL, I don't know anything -

SLM - Public w/in 1 year thru dummy Corp/Shell Corp
w/in 1 1/2 yrs - SL shares worth \$90MM

A MIRACLE WORKER

ALREADY HAD OFFICE IN SAID SAUS &

when SL went there, ALREADY WORKING
HANDLED THINGS.

DID WHAT SAID

SAID greeted/smoothes man I ever met

DID everything for, except business decisions

IF

[REDACTED]

→ HARD WORKER

b6
b7C

OTHER COS - PROVIDED LIST

KNOWS

[REDACTED]

FOR

[REDACTED]

- BASED IN

[REDACTED]

OUT SL'S NAME ON MANY THINGS

SL KNOWS - EAT TIME MEDIA - CARDS DISTRIBUTOR FOR 7-11 etc, CAME

TO SLM + ENTERED DEAL [REDACTED] TO MARKET

CARDS w/ COMIC STRIPS INSIDE

- WORKED FOR MONTHS

[REDACTED] NAME SL WANTED TO USE FOR SLM

[REDACTED] - MUST BE

[REDACTED]

W/

[REDACTED]

ONCE ASKED SL +

[REDACTED]

- SLM IS CO..

[REDACTED] NICE GUY, SLM INVESTOR; LOST BIG \$

met once or twice @ SLM office

SL put SLM stock w/ [redacted] rather than [redacted]

b6
b7c

DNB if [redacted] advised SL to [redacted]

SL it asked [redacted] how to get some of that \$90MM

[redacted] said it [redacted]

[redacted] so [redacted] solved it by [redacted]

[redacted] big, unforgettable conversations - 3-4 times

SL, "I have all this \$, what if I lose it"

[redacted] said [redacted]

SL thinks [redacted] was doing this - ^{thinks} did it to [redacted]

[redacted] never said [redacted]

but the conversations gave SL impression that he did.

SL said, I hate to borrow, I never borrowed in my life except ^{when [redacted] asked it} but what if [redacted]

[redacted] implied SL [redacted]

[redacted] when stock went down, ^{Maybe Feb 2000} [redacted]

[redacted] - SAID NOT TO WORK

b6
b7C

[redacted]

SL thought this meant they were buying more stock

SL SAID

[redacted]

[redacted]

SL NOT AWARE OF CASH PROBLEM @ Co.

NOT UNTIL [redacted] came on that SL + others
were alerted to problems

[redacted] hired

[redacted]

[redacted]

[redacted] was running the Co., but [redacted] went to run Co. b/c he was

[redacted]

@ formation of Co. [redacted] said

[redacted]

[redacted]

DNK if [redacted] did same thing w/ other Cos

[redacted]

- hunt by [redacted] too

FROM THE START, SLM 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 MM

TALKED ABOUT Buying a shell Co - GOT one ~~ACT~~ even
on Bulletin Boards + eventually wound up on NASDAQ

SLM worked on - Seventh Portal - ANIMATED SHOW
SOLD TO VIACOM AS
Interactive Home park ride
Superhero COMICS ON INTERNET
The Drifter + 2 others

Never sure how SLM MAXIMIZING, but Co seemed to be doing
well, ALWAYS LISTED AS one of TOP 10
Internet Cos.

GOT to 150 pees - everyone busy

DNK how MAKING money, - but things looked good

[REDACTED] - told [REDACTED] what to do
[REDACTED] DN MAKES DECISIONS; [REDACTED] did

[REDACTED] - [REDACTED]
DNK what he did

SL NOT INVOLVED w/ Finance + bookkeeping

[] ALSO ALWAYS looking for FINANCIAL

b6
b7C

DISAPPOINTED IN []

MANY TIMES [] had [] come to mty []

[]

NOT SURE IF THEY INVESTED

MACROMEDIA - INVESTED ~ \$5 MM - \$10 MM

- TO PARTNER w/ them on ANIMATION PROJECTS

- HEAD of MACRO may have been on SLM BOARD

~~DE~~ KNOWS ELLIOTT ASSOCIATES ONLY BY NAME

DNK MAXI or SANTO

Venture Soft - JAPANESE Co; Big plans

SL + []

b6
b7C

SL still close w/ []

Venture
Soft

VS had problems going public + it all fell apart
FINANCIAL PROBLEMS

SL still in contact w/ []

Letter ~ 4 mos Ago = LAST Contact

[] TOOK SL TO []

b6
b7c

SL DNX HOW VS deal came about

PROBABLY Generated by [] or []

[] WORKED FOR []

PROBLEMS

AWARE LITTLE BY LITTLE AFTER []

[] SAYING THAT []

- NOT LISTENING TO [] i.e. trying to act on his own

SL talked to [] realized that []

[] SAW THAT []

SL ON REALIZE THAT [] SUSPECTED []

[] started talking about []

LATER, [] MEMBERS FOR [] HAD BEEN VOTED OUT
+ THIS WAS THE 1ST TIME SL KNEW
Co. WAS REALLY IN TROUBLE

[] SAID \$/MM/MO. OVERHEAD + NO \$ COMING IN
- HAD TO FIRE PEOPLE
- BUT, ART STAFF HAD GOLDEN PARACHUTES
+ SO, Co. COULD NOT AFFORD TO KEEP OR FIRE THEM

DAY-TO-DAY- SL come in + write outlines for shows,
met w/ artists
Answered phones + letters
lectures re: SLM
INDUSTRY MTGS re: SLM
ALL WORK ON CREATIVE END

DN Ask for Fin'l Reports - DN understand them

ATTENDED BD mtgs, but half asleep

Time & time - mtg w/ [redacted] re: [redacted]
or whether people who come in
were going to invest

b6
b7C

[redacted] JUST SAID [redacted]

unsure if
projects
generated
any revenue
at all

PAYMENTS

2x [redacted] asked for [redacted]

1x - [redacted]

SAID [redacted]

THAT SL had but never used,

So, SL [REDACTED]

Doc - ^{re: Cynthia Gershman} GUARANTEED By [REDACTED]
Sent to SL by [REDACTED] much later.
maybe when [REDACTED]

~~DATED~~

CG - wealthy woman - met SL couple times; hosted
receptions, including one of Hillary Clinton

[REDACTED] - connxn of [REDACTED] DNK what [REDACTED] did.

[REDACTED] SAID [REDACTED]

[REDACTED] not well spoken, not good-looking -

SL DNK why [REDACTED] got in w/ famous people

[REDACTED] SAID needed [REDACTED]

SL SAID [REDACTED]

[REDACTED] SAID [REDACTED]

+

DNK why [REDACTED] needed [REDACTED] to do this?

totally trusting + unsuspecting of [REDACTED]

Thought to MAKE [REDACTED]

- HATE to see [] come out of THIS
Smelling Like A Rose

[]

[]

never mentioned

[]

- Knows the name. No Details
impression that [] wanted to
raise money / mentors thru []

DNK asmts blw [] + SLM re: []

[]

always looking to get people to promote SLEE
in general; no specifics

SL thought this should be pursued

DNK ED WALKER

[]

[]

1 only / charms / class

DID NOT THINK ANYTHING ABOUT EXCELSIOR

Just relaxed + rushed to bank to deposit check

[REDACTED] DID NOT MENTION ANY FINANCIAL PROBLEM

b6
b7C

RATHER [REDACTED]

Thought \$100,000 WAS A BUSINESS MATTER, NOT PERSONAL

@ Oct/Nov/Dec - [REDACTED] looking tense

SL thought [REDACTED] worried about stock price decline

LAST time SL saw [REDACTED] was in [REDACTED] office
+ still did not think [REDACTED] did wrong
felt awful about [REDACTED] being pushed out

Never heard from [REDACTED] again

Thought [REDACTED] was his closest personal friend
[REDACTED] wanted SL to [REDACTED]

Months later [REDACTED] lawyer came to office

DN recall the substance

No real conversations

SSAN -

DOB - 12/28/22

9143 ORIOLE WAY

310 -

LA 90069

2450 Broadway, Suite 500

SM, CA

310 -

No personal relationship w/ [redacted]

b6
b7C

[redacted] to the house, not [redacted]

DNK if SCM sees had acct w/ [redacted]

DNK if SCM had policies about reporting on stock
SL DNK ever doing

SL got 3.6 MM shares

[redacted] got a bit less [redacted] or so [redacted]

[redacted] never said he was selling SCM,

just guessed that he was borrowing on them

DNK
[redacted]

Near a time when [redacted] approached SC and
ASKED SC to personally guarantee
any debts of Co.

NOT AWARE OF ANY CLAIMS ABOUT
US BANK

"shocked"

shocked"

Aware of equipment purchases by SCM that
were gotten w/ forgeries of SC's name

Bill Clinton - just a Hello

earlier - restaurant @ Carr's Des Moines when
Pres was there + SL + [] greeted by Pres
(SL DMK if [] arranged this luncheon)

b6
b7C

SL DMK - [] etc

SL not aware ^{whether} ~~that~~ SLA PMO 365,000 for GALT

ON 1st Dinner @ []
+ tea @ Cher's

[] ATTORNEY
Some other event,
maybe @
BARBARA
Stewart's

Democrats/Hillary

has never tried to contact SL

Federal Watch never tried to contact SL either
but SL looks @ website

[] SAID THAT HE HAD SEEN []
PRACTICING SL'S SIGNATURE

b6
b7C

The equipment leases often had
[] signature below the SL forgery
indicating [] was a witness

Never ^{heard of} a \$/MM guarantee by US Bank

No contact

CLINTON PARTY

1st Arms of Gma when [] SAID []

b6
b7C

Before that, a cocktail party @ Gershman's house

SL not @ all political

[] arranged things + put SL AS co-host
SL felt impt

SL [] would say, []

+ that's how SL would find out

6/9/00

Luncheon @ SPAGU + then Afternoon tea @ Gershman

DP try to call [redacted] about to b/c
understood that [redacted]
[redacted]

Jean Lee called Gershman about this
but she denied all knowledge

SL wrote it off.

SL sat ~~at~~ next to Hilary during concert
On Remember Spago Dinner

Spoke briefly w/ Bill & Hilary upon their arrival
but not later

Spoke w/ Hilary @ Gershman tea
intro'd Joan to Hilary co. his "trophy wife"

Next mto @ Gershman's Hilary recalled the
trophy wife comment
+ SL shocked

6/9- SL contribution to 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 host + SL loved it

SL not involved @ all in planning of. GALA

SL only made introductory speech + nothing else

~~the~~ Event @ [] estate

SL assumed [] getting \$ from Gershwin

[] never discussed financing

Said ~~that~~ it would be greatest thing if

SLM could []

[] + SL thought it would be great

\$100,000 Check to NY Senate 2000

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 -

DNK if Gershman ever paid any money,
but [] definitely expected to get

b6
b7C

[]
or b6 []

- PARAVASAC check dated 8/8/00

- GUARANTEE signed by []

DNK why it was signed by []

~~DN~~

DN expect this letter + dn care about
cost breakdown

SL only wanted acknowledge []

debt

GUARANTEE came unexpectedly, after [] was gone
came w/ a note that said

[]

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 @ all

ANNUAL check -

b6
b7C

"underwriting Clinton tribute"

was put on there

but SL not sure if that is what it was used for

Never repaid a cent

225,000 written on SL's
Equity ~~line~~ credit line

SL NEVER discussed check of Democratic PARTY ees
Never called by them

No other payment for Clinton tribute

other than check to District PARTY

x
1,000 or 2,000

was

RS: GALA

b6
b7C

AFISA SUSAN SUSANT

[REDACTED] - FAMILIAR

[REDACTED]

Did a lot of work for [REDACTED]

[REDACTED]

ACCORD TO [REDACTED]

[REDACTED]

Good looking guy - clean cut

DNK what line of work [REDACTED] was in

on

DN Recall him

DNK he used
SLM office
space

DNK Black INK

[REDACTED]

[REDACTED]

Never SAT IN ON GUAC PLANNING MTGS OR DISCUSSIONS

FEDERAL BUREAU OF INVESTIGATION
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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 06/15/2001

To: Los Angeles

Attn: SAC

From: Los Angeles

WCC-6

Contact: SA [redacted]

Approved By: [redacted]

3W (acting SAC)

Drafted By: [redacted]

DCS

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

Title: [redacted]

U.S. SENATE CAMPAIGN OF HILLARY CLINTON;
ELECTION LAW VIOLATIONS;
OO: 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 [redacted] STAN LEE is a well-known comic book creator and the founder of STAN LEE MEDIA. [redacted] was LEE's [redacted] [redacted] was the [redacted] 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.

[redacted] In addition, he was recently [redacted] involvement with STAN LEE MEDIA.

On May 6, 2001, [redacted] was interviewed after she made a complaint to the Los Angeles Division. [redacted] as [redacted] In [redacted] was hired by [redacted] of the CLINTON tribute event. [redacted] job was to [redacted]

[redacted] At several planning meetings, [redacted] was [redacted]

See [redacted]

6/18/01 - KUN

UPLOADED BY *PM*
DATE *7/11/01 - R. K. Raul*

56C-LA-227506-1

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U.S. Department of Justice

Federal Bureau of Investigation

In Reply Please Refer to
File No

Los Angeles, California 90024

June 14, 2001

[REDACTED]
U.S. SENATE CAMPAIGN OF HILLARY CLINTON;
ELECTION LAW VIOLATIONS;
OO: LOS ANGELES,
56C-LA-227506

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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 [REDACTED] STAN LEE is a well-known comic book creator and the founder of STAN LEE MEDIA.

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b7C

[REDACTED] was LEE's [REDACTED] [REDACTED] was the [REDACTED] 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.

[REDACTED] In addition, he was recently [REDACTED] involvement with STAN LEE MEDIA.

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On May 6, 2001, [REDACTED] was interviewed after she made a complaint to the Los Angeles Division [REDACTED] In [REDACTED] was hired by [REDACTED] of the CLINTON tribute event. [REDACTED] job was to [REDACTED]

[REDACTED] At several planning meetings, [REDACTED] was introduced to others who were working on the event including; [REDACTED]

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[REDACTED] had offices at the headquarters of STAN LEE MEDIA. [REDACTED] worked closely with [REDACTED] had final approval for everything related to the event. [REDACTED] was responsible for [REDACTED] a tribute book honoring PRESIDENT CLINTON. Each attendee received a copy of the book. Following the event, [REDACTED] was paid [REDACTED] However,

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56C-LA-227506-2
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U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No

Los Angeles, California 90024
August 13, 2001

[REDACTED]
NEW YORK SENATE 2000
CAMPAIGN FINANCE LAW VIOLATIONS
OO: 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 fund-raising 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 [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. [REDACTED]

[REDACTED] review of interviews conducting during other FBI investigations [REDACTED] review of media reports

[redacted] et al;
CAMPAIGN FINANCE LAW VIOLATION
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about the CLINTON TRIBUTE, and an analysis of bank records
obtained [redacted]

[redacted] is the [redacted] 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. [redacted]

[redacted]
[redacted]
[redacted] 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. [redacted]

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Complaint of [redacted]

This case was initialed as a result of a complaint made
by [redacted] is employed as a [redacted].
She was hired to handle [redacted]
[redacted] worked closely with [redacted]
event. For her services in handling [redacted] for the
CLINTON TRIBUTE, [redacted] was paid a fee of [redacted] by [redacted]
This payment was made [redacted]

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On June 21, 2001, a follow up interview was conducted
with [redacted] During this interview, [redacted] stated that she

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[redacted] et al;
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<u>Vendor</u>	<u>Purpose</u>	<u>Date</u>	<u>Amount</u>
FRIENDS OF BARBARA BOXER	List Rental	9/12/2000	\$ 126.80
[redacted]			
TOTAL			\$512,165.03

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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 it's non-federal account to it's 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 [redacted] company. [redacted] told [redacted] that he [redacted] spent over [redacted]. These expenses were for [redacted]. [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.

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[redacted]

[redacted]

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[redacted] indicated that he [redacted] was trying to [redacted] STAN LEE." He sought to [redacted] [redacted] claimed that he was approached by his [redacted] about contributing money to

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[redacted] et al;
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the Democratic Party in order to [redacted]
[redacted] advised that he began to attend various Democratic events and donated money to the party. During one particular event [redacted] claimed that [redacted] was approached by Democratic National Committee (DNC) [redacted] DNC [redacted] and [redacted] about making substantial contributions to DNC events in order to gain access to President CLINTON. [redacted] could then get the President's support for [redacted]
[redacted] In addition, [redacted] had hoped that CLINTON would become involved with STAN LEE MEDIA or [redacted] after he (CLINTON) left office.

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

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

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[redacted] In addition, according to [redacted] CLINTON agreed to [redacted]
[redacted] In addition, CLINTON promised to [redacted]

[redacted] claimed that [redacted] promised these [redacted] in exchange for [redacted]

[redacted] et al;
CAMPAIGN FINANCE LAW VIOLATION
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[redacted] stated that [redacted]
[redacted] all aspects of the CLINTON TRIBUTE
with the White House. [redacted]
[redacted] claimed
that he [redacted] In addition, [redacted]
indicated that he [redacted]
[redacted] The costs for the event began to mount to nearly
\$1.25 million dollars. [redacted] about the
costs of the event [redacted]
[redacted] told [redacted]
[redacted]
[redacted] At some
point, [redacted] stated that he attempted to [redacted] the
CLINTON TRIBUTE because of the mounting costs. However, [redacted]
[redacted] told him that if he [redacted] did so, [redacted]
[redacted]
[redacted] advised that on numerous
occasions, HILLARY CLINTON [redacted]
[redacted]

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[redacted] he repeatedly
told [redacted] that he [redacted]
[redacted] STAN LEE MEDIA and STAN LEE had no role in financing the
event. In addition, [redacted] claimed that members of HILLARY
CLINTON's staff, including [redacted]
[redacted] even claimed
that President CLINTON himself was aware of this fact. CLINTON
had been told about [redacted]

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b7C

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

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[redacted] provided information about a
[redacted] was a [redacted]
[redacted]
towards the cost of the CLINTON TRIBUTE. [redacted] also [redacted]
[redacted]
It was arranged for [redacted] to [redacted]
[redacted] In
addition, [redacted] claimed that [redacted] also made [redacted]
[redacted] was later invited to a
[redacted]

b6
b7C

[redacted] et al;
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56C-LA-227506

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b7C

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

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In addition, [redacted] recalled that an individual named [redacted] 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. [redacted] advised that STAN LEE MEDIA billed [redacted] for use of the office space, but [redacted] never paid.

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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 [redacted] [redacted] was interviewed [redacted] for the report. During the report, the ABC news reporter stated that an unidentified HILLARY CLINTON staff claimed that they had simply reported what [redacted] told them the expenses for the event were. HILLARY CLINTON was approached by the reporter, however, she declined comment.

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Analysis of [redacted]

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

Arrest of [redacted]

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b7C

In early [redacted] [redacted] was arrested by law enforcement officials [redacted] He is currently awaiting [redacted]

Concurrence of AUSA [redacted]

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

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File: 268 d605.01

56C-LA-227506

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DATE 10/9/01 - Rota Road

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 09/07/2001

[redacted] residence [redacted]
 [redacted] telephone [redacted] date of birth [redacted]
 [redacted] Social Security Number [redacted] 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, [redacted] provided the following
 information:

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[redacted] advised that she is currently employed at the
 [redacted] as an [redacted]
 [redacted] She has
 been in that position for the past [redacted] stated that
 she has worked as an assistant for [redacted] on and off for the
 past [redacted] She was hired by [redacted] as the [redacted] for
 the HOLLYWOOD GALA SALUTE FOR PRESIDENT WILLIAM JEFFERSON CLINTON
 ("GALA"). [redacted] advised that her role was to [redacted]
 [redacted] She
 worked on the GALA for about [redacted] until
 [redacted]

1,2,3,4,5
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[redacted] stated that her working relationship with [redacted]
 has been sporadic. Prior to working on the GALA, [redacted]
 [redacted]
 [redacted] In [redacted] recalled that [redacted]
 [redacted] However, on each occasion [redacted]
 [redacted] advised that after she
 [redacted] asked her to [redacted]
 [redacted]
 [redacted] The GALA was not specifically mentioned
 at that time. [redacted] stated that she was [redacted]
 [redacted]

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[redacted] advised that she was paid approximately [redacted]
 [redacted] Payment was made through [redacted]
 [redacted] recalled getting [redacted] accounts in
 the name of STAN LEE MEDIA (SLM), [redacted] and PARAVERSAL. She
 also would occasionally [redacted]

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

File # 56C-LA-227506-9

Date dictated

by SA [redacted]
SA [redacted]b6
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56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 8/31/01, Page 4

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

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

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

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[REDACTED] identified some vendors who were involved in planning the GALA. [REDACTED] was working with [REDACTED] recalled that [REDACTED] 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. [REDACTED] and [REDACTED] provided the [REDACTED]

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[REDACTED] was paying for most of these expenses through checks that came from his bank accounts. In June/July 2000, [REDACTED] recalled having a phone conversation with [REDACTED] During this conversation, [REDACTED] told her [REDACTED] During another meeting, [REDACTED] expressed concerns about the cost of the [REDACTED] for the GALA. [REDACTED] also recalled having a conversation with [REDACTED] during which [REDACTED] said he was responsible for [REDACTED] of the event. [REDACTED] also told [REDACTED] that he [REDACTED] wanted to [REDACTED] of the GALA. This discussion took place at the [REDACTED]

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File: 285d1508.0

58C-LA-227506-10

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DATE 10/17/01-Rotated le

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/27/2001

[redacted] date of birth [redacted]
residence [redacted]
Social Security Number [redacted] was interviewed at the law
offices of [redacted]
[redacted] telephone [redacted]. Also
present at the interview was attorney [redacted]. After being
advised as to the identity of the interviewing agents and the
nature of the interview, [redacted] provided the following
(information):

[redacted] stated that she was employed at STAN LEE MEDIA
(SLM) from [redacted]
[redacted] She was initially employed as the company's [redacted]
From [redacted] was [redacted]

[redacted] indicated that she was primarily responsible for the
[redacted] at SLM. She also had duties within the
[redacted] reported directly to [redacted]

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

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

[redacted] also assisted in planning the GALA.
[redacted] indicated that [redacted] was the [redacted]

Investigation on 8/21/01 at Los Angeles, CAFile # 56C-LA-227506

Date dictated _____

by SA [redacted] dcs [initials]

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 8/21/01

, Page 2

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[REDACTED] also used an office within SLM. [REDACTED] recalled that [REDACTED] once told her that he [REDACTED] was responsible for [REDACTED]. She was first introduced to [REDACTED] [REDACTED] did not see [REDACTED] again after the GALA.

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

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[REDACTED] 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. [REDACTED] stated that the FEC disclosure statement was incorrect. The [REDACTED] at SLM had no idea about this supposed contribution. She had specifically told [REDACTED] SLM that the company would not have anything to do with the GALA. [REDACTED] stated that she was told by an SLM employee named [REDACTED]

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

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

[REDACTED] indicated that she had wanted to [REDACTED]. However, due to time limitations, she never did. She spoke with [REDACTED] about [REDACTED]

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[REDACTED] 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 [REDACTED] was unaware of any payments made to SLM to reimburse the company for the support expenses. [REDACTED] indicated that these expenses would have been minimal,

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Continuation of FD-302 of [REDACTED]

, On 8/21/01

, Page

3

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and would not have added up to \$366,000 as was identified in the FEC disclosure statement.

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

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[REDACTED] was aware that [REDACTED] owned a large home in [REDACTED]
[REDACTED] He [REDACTED] used to be [REDACTED] and he was
[REDACTED] recalled that [REDACTED] could also be
extravagant. [REDACTED] spent about [REDACTED]
[REDACTED] She was first introduced to [REDACTED] in [REDACTED]
when she [REDACTED]

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[REDACTED] stated that she first met [REDACTED] at some
time (exact date unknown) [REDACTED] described himself as a
[REDACTED] He [REDACTED] considered [REDACTED] to be [REDACTED]
[REDACTED] was aware that [REDACTED] had [REDACTED] 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 [REDACTED] However, she was aware that a SLM
[REDACTED] would help [REDACTED] on his own. [REDACTED] went to
work for [REDACTED]

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[REDACTED] was the [REDACTED]
advised that [REDACTED] had
wanted to launch [REDACTED] of SLM. [REDACTED] advised
that she helped [REDACTED]
[REDACTED] primarily [REDACTED] recalled
that [REDACTED] also attended the GALA. She saw him at the event, and
they exchanged greetings. However, [REDACTED] did not know if [REDACTED]
financially contributed to the GALA.

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[REDACTED] was familiar with CYNTHIA GERSHMAN. STAN LEE
told [REDACTED] that he (LEE) was owed [REDACTED] LEE
claimed that he had taken out a loan and had given the money to
[REDACTED] stated that LEE told her that [REDACTED] directed him
(LEE) to collect the [REDACTED] from GERSHMAN. However, LEE has
never been re-paid. [REDACTED] advised that she had heard that
GERSHMAN attended a dinner hosted at [REDACTED] for PRESIDENT
CLINTON. She heard about this dinner from [REDACTED]

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56C-LA-227506

Continuation of FD-302 of [REDACTED], On 8/21/01, Page 4

[REDACTED] advised that this group [REDACTED]

[REDACTED] She was unsure of the charity purpose of the FOUNDATION. [REDACTED] (phonetic), a former [REDACTED]

[REDACTED] worked for [REDACTED] another [REDACTED] owned company. [REDACTED]

[REDACTED] believed that the FOUNDATION was [REDACTED]

[REDACTED] for the FOUNDATION [REDACTED]

[REDACTED] advised that STAN LEE had donated his desk to be auctioned off. The money raised was donated to the FOUNDATION.

[REDACTED] stated that she had no additional information about the GALA, and the interview concerning the GALA was concluded.

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File: 298ds01.01

56C-LA-227586-1

UPLOADED BY DM
DATE 10/29/01 - Rota Kaul

[Handwritten signature]

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/21/2001

[redacted] residence [redacted]
[redacted] telephone [redacted] date of birth [redacted]
(year not provided), was interviewed 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, [redacted] provided the following information:

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

[redacted] indicated that [redacted] always believed that SLM [redacted]. She was supposed to be paid [redacted]. However, [redacted] advised that she was only paid [redacted]. [redacted] She was given [redacted]. [redacted] indicated that she [redacted] on the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA), and as a result [redacted]. However, [redacted] did agree to [redacted].

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

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

File # 56C-LA-227506

Date dictated

by SA [redacted]
SA [redacted]

dcs

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 10/19/01

, Page 4

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Los Angeles. This dinner may have also been paid for by [REDACTED] and CYNTHIA GERSHMAN. The third occasion was at the GALA. [REDACTED] advised that she never had any substantive discussions with CLINTON.

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

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[REDACTED] for the event. [REDACTED] 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.

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

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[REDACTED] stated that she and [REDACTED] left SLM [REDACTED]. Other employees were [REDACTED] stated that another employee named [REDACTED] 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. [REDACTED] described LEE as being a nice man who was "out of it." In reality, [REDACTED] in charge at SLM.

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

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[REDACTED] advised that she would continue to cooperate in the investigation. At this point, the interview was terminated.

UPLOADED BY: RM
DATE: 1/21/01 - Lota Reed

RM

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/24/2001

[redacted] residence [redacted]
 [redacted] telephone [redacted] date of birth [redacted]
 [redacted] 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, [redacted] provided the following information:

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[redacted] advised that he is employed as [redacted]
 [redacted] For the past [redacted] has operated a company called [redacted] was [redacted] of the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA) which was held on August 12, 2000. The GALA was the only event that [redacted] as a fundraiser for the Democratic party. [redacted] indicated that [redacted] several other Democratic events including a June 2000 luncheon at SPAGO for HILLARY CLINTON, a tea for MRS. CLINTON held immediately following the luncheon at the home of CYNTHIA GERSHMAN, and another tea for MRS. CLINTON that was hosted by CHER in September 2000. The SPAGO luncheon was not a fundraiser, just a social gathering of Hollywood celebrities to meet HILLARY CLINTON. The two teas were fundraisers for CLINTON's U.S. Senate campaign. [redacted] described [redacted]

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[redacted] stated that he was responsible for the initial introduction of [redacted] to various officials of the DEMOCRATIC NATIONAL COMMITTEE (DNC) including [redacted] and [redacted]. The first DNC official [redacted] ever met was [redacted]. She was the DNC's [redacted]

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[redacted] claimed that [redacted] HILLARY CLINTON's U.S. Senate Campaign, was well aware of the actual cost of the GALA. [redacted] about the rising costs of the event. [redacted] when [redacted] and [redacted] would discuss the high cost of the GALA. [redacted] may have also witnessed these conversations. [redacted] did not know how much was actually spent for the event. He estimated the cost to be approximately \$1 to \$1.5 million dollars.

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b7CInvestigation on 10/23/01 at Los Angeles, CAFile # 56C-LA-227506-13 Date dictated _____by SA [redacted]
SA [redacted]b6
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Continuation of FD-302 of [REDACTED]

, On 10/23/01, Page 4

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would say that [REDACTED] Essentially, [REDACTED] would lie if he was ever confronted about the false disclosure. [REDACTED] believed that [REDACTED] knew the true cost of the event and he [REDACTED] deliberately underreported the amount in the FEC disclosure reports. [REDACTED] has not spoken with [REDACTED] since this conversation which occurred [REDACTED]

[REDACTED] stayed at [REDACTED] while he worked on the GALA in [REDACTED] were paid for by [REDACTED]

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

[REDACTED] and [REDACTED] were involved with [REDACTED] [REDACTED] was an investor in SLM. [REDACTED] believes that [REDACTED] attended a state dinner at the White House. [REDACTED] may have arranged for [REDACTED] to get [REDACTED] Pictures of [REDACTED] were taken. [REDACTED] was trying to help SLM build a strong relationship [REDACTED] He [REDACTED] was doing this as a favor to [REDACTED]

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[REDACTED] was not aware that [REDACTED] had discussed a [REDACTED] However, [REDACTED] said, [REDACTED]

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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.

[REDACTED] 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 [REDACTED] was for other expenses [REDACTED] The ASF check [REDACTED] claimed that [REDACTED] that he [REDACTED] was not responsible.

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[REDACTED] did not work on the GALA. [REDACTED] assists [REDACTED] with other matters. He [REDACTED] has worked on other charity events [REDACTED] was another [REDACTED] who worked briefly on the GALA. However, [REDACTED] did not get along with [REDACTED].

File: 310ds01.01

56C-LA-227506-12



UPLOADED BY RM
DATE 11/10/01 - Rita Reid

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 11/01/2001

[redacted] residence [redacted]
 [redacted] home telephone [redacted] date of
 birth [redacted] Social Security Number [redacted] was
 interviewed at 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, [redacted] provided
 the following information:

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[redacted] advised that she is the owner of [redacted]
 located at [redacted]
 telephone [redacted] She founded the company approximately
 [redacted] ago. [redacted] specializes in [redacted]
 [redacted] has a background in [redacted]
 [redacted]

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[redacted] hired [redacted] to work on the HOLLYWOOD GALA
SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA). She was
 retained to help [redacted] 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.

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Planning for the GALA began in mid to late July 2000.
 [redacted] 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
 [redacted] could not recall the approximate date
 when that meeting took place. [redacted] was going to [redacted]
 [redacted] Also present at this meeting were [redacted]
 [redacted] was a [redacted] In addition,
 [redacted] and members of his staff were at this meeting. [redacted]
 recalled that this meeting dealt primarily with planning the
 concert.

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[redacted] KEN ROBERTS estate in Mandeville Canyon was selected by
 [redacted] as the venue for the GALA. Prior to the event, there was a
 meeting at the estate to do a run-through.

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b7CInvestigation on 10/31/01 at Los Angeles, CAFile # 56C-LA-227506-15

Date dictated _____

by SA [redacted]
SA [redacted]

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56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 10/31/01, Page 2

Vendors who worked on the GALA included [REDACTED] and [REDACTED] from [REDACTED] and [REDACTED] from [REDACTED] ROGERS AND COWAN, a public relations firm; [REDACTED] who did the [REDACTED] [REDACTED] and [REDACTED] worked in [REDACTED] described her own duties as [REDACTED]

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

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

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

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[REDACTED] was responsible for [REDACTED] who worked on the GALA. When a particular [REDACTED] would give it to [REDACTED] would then [REDACTED] [REDACTED] assumed that the money came from SLM. However, [REDACTED] admitted that she did not know if it was true. She would sometimes [REDACTED] or there were times when [REDACTED]

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The GALA expenses that [REDACTED] [REDACTED] 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 [REDACTED] production

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File: 333ds06.01

562-LA-227506-18

UNCLASSIFIED BY DM
DATE 12/5/01 - John Kuo

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- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 11/16/2001

[redacted] residence [redacted]
 [redacted] telephone [redacted] date of birth [redacted]
 [redacted] Social Security Number [redacted] was interviewed at
 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, [redacted] provided the following
 information:

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[redacted] advised that he is employed in [redacted]
 [redacted] For the past [redacted] he has [redacted]
 [redacted] has also [redacted]
 [redacted]

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

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

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

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b7CInvestigation on 11/13/01 at Los Angeles, CAFile # 56C-LA-227506 -18 Date dictated _____by SA [redacted] dcsb6
b7C

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 11/13/01 , Page 2

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check for [REDACTED] stated that a check for [REDACTED] and another check for [REDACTED] were drawn from [REDACTED] [REDACTED] was also given at the conclusion of the event. [REDACTED] estimated that the final cost for the [REDACTED] production was on budget at approximately [REDACTED].

[REDACTED] reviewed a copy of [REDACTED]

[REDACTED]

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

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

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File: 344ds01.01

56C-LA-227506-20

INDEXED BY RM
DATE 12/13/01 - Rota

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- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 12/10/2001

[redacted] telephone [redacted] date of birth [redacted]
[redacted] Social Security Number [redacted] was interviewed at
the law offices of [redacted]

[redacted] Also present at this interview was her attorney [redacted]. After being advised as to the identity of the interviewing agent and the nature of the interview, [redacted] provided the following information: 1,2,3,4,5

[redacted] is currently employed at [redacted]. Her duties consist of helping around the office. [redacted] has a background in [redacted]. She is trying to get back into that business.

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

[redacted] was the [redacted] HILLARY CLINTON United States Senate Campaign. He [redacted] was the [redacted] for the CLINTON campaign for the GALA. [redacted] was the GALA [redacted] who was responsible for [redacted]. When an individual would accept an invitation to the GALA, they would send the RSVPs [redacted] was responsible for [redacted].

[redacted] recalled that she went with [redacted] to a meeting at [redacted]. The purpose of this meeting was to discuss the [redacted] for the GALA dinner. Also present at this meeting were [redacted] and [redacted].

Investigation on 12/7/01 at Beverly Hills, CA

File # 56C-LA-227506-20

Date dictated _____

by SA [redacted] /dcs

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 12/7/01

, Page

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[REDACTED] was a donor to the HILLARY CLINTON Senate Campaign. He also was a [REDACTED] stated that [REDACTED] was with [REDACTED] and [REDACTED] at an event in [REDACTED] when plans for the GALA were initially discussed. [REDACTED] worked a little with [REDACTED] who was [REDACTED] of the event. [REDACTED] and [REDACTED] had a "professional relationship." They had mutual respect for each other, but they also [REDACTED] [REDACTED] described [REDACTED] as "hyper" about everything.

[REDACTED] was involved in the [REDACTED] for HILLARY CLINTON that was held at [REDACTED] [REDACTED] stated that she did not know who paid the expenses for the event. She [REDACTED] did not believe that SLM was involved. However, [REDACTED] and [REDACTED] were responsible for coordinating this [REDACTED]

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[REDACTED] advised that she never had any dealings with STAN LEE. LEE was only interested with his comic book creations. CYNTHIA GERSHMAN was a wealthy [REDACTED] GERSHMAN gave [REDACTED] The GALA was held at a ranch owned by KEN ROBERTS. [REDACTED] did not believe that ROBERTS was paid for the use of the ranch.

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

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[REDACTED] was the CLINTON campaign official to whom [REDACTED] was not sure if [REDACTED] received copies of invoices of expenses from the campaign events. [REDACTED] was a campaign [REDACTED] is HILLARY CLINTON's [REDACTED] participated in a [REDACTED] just prior to the GALA.

[REDACTED] was introduced to [REDACTED] at the GALA. [REDACTED] assisted in [REDACTED] the GALA [REDACTED] She did know the relationship between [REDACTED] and [REDACTED] did not have any information about [REDACTED] or [REDACTED] Also, [REDACTED] had never heard of BLACK INK PRODUCTIONS.

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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



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No

Los Angeles, California 90024
January 3, 2002

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

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The following is an interim report about the progress of the investigation into allegations that [REDACTED] 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 [REDACTED] 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. [REDACTED]
[REDACTED]

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RECEIVED BY *km*
DATE *1/4/02* *Roth Rowl*

Judicial Watch
56C-LA-227506-22

the company would not have anything to do with the GALA. Prior to the GALA, [redacted] and STAN LEE were personally involved in staging the GALA, and SLM was not involved. [redacted] also told her [redacted] that [redacted] and LEE personally funded the GALA. [redacted] 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.

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

Analysis of [redacted]

An analysis of [redacted]

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, [redacted] 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 [redacted] 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 [redacted] paid for both the luncheon and the tea. However, [redacted] may have attempted to hide his contribution by using [redacted] as a middleman.

[redacted] stated that he helped [redacted] the luncheon and the tea. He described his [redacted] role as

[redacted]
[redacted]
both the luncheon and the tea. [redacted] was the [redacted] for the events. [redacted] provided the [redacted] 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

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56C-LA-227500-24

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DATE 7/16/02 Lotusland 

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 01/10/2002

[redacted] residence [redacted]
 [redacted] home telephone [redacted] date of
 birth [redacted] Social Security Number [redacted] 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, [redacted] provided the following information:

[redacted] has been [redacted] for
 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). [redacted]

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

[redacted] would occasionally give [redacted]
 [redacted] indicated that she wanted to make sure that
 everyone got paid. She would [redacted]

[redacted] On occasion, [redacted] would even [redacted]
 [redacted] The checks were drawn from an
 account that was [redacted] stated that [redacted]
 had received the [redacted]

[redacted] indicated that [redacted] had prepared several
 [redacted] In
 one announcement, [redacted] STAN LEE, [redacted] and CYNTHIA
 GERSHMAN are listed [redacted] In another
 announcement, [redacted] and LEE are [redacted] Finally, in a third
 announcement, [redacted] and LEE are listed as [redacted]

[redacted] advised that [redacted]
 [redacted]
 For example [redacted] would send the announcement [redacted]
 STAN LEE [redacted] stated that it was
 an [redacted]

Investigation on 01/09/02 at Los Angeles, CA

File # 56C-LA-227506-24 Date dictated _____

SA [redacted]
 by SA [redacted]

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56C-LA-227506-21

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DATE 3/6/02 - Rotor Level

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- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/27/2002

[redacted] residence [redacted]
[redacted] telephone [redacted] date of
birth [redacted] Social Security Number [redacted] was
interviewed at the law offices of [redacted]

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[redacted] Attorney [redacted]
[redacted] of [redacted] 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,
[redacted] provided the following information:

1,2,3,4
DS

[redacted] is currently [redacted]
[redacted] For approximately [redacted]
[redacted] was a member of the [redacted]
[redacted] He was an [redacted] PRESIDENT WILLIAM J.
CLINTON and VICE PRESIDENT ALBERT GORE. For many years he worked
[redacted] In late [redacted] was
looking to leave [redacted] He was initially introduced
to [redacted] by [redacted] (phonetic). [redacted] is the [redacted]
[redacted] In [redacted]
was hired by [redacted] to become the [redacted]
[redacted] and to be a [redacted] to STAN LEE MEDIA (SLM).

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[redacted] was an [redacted] that was
established to provide [redacted]
[redacted] and he was trying
to attract investors. Other employees at [redacted] included
[redacted] and [redacted] used to be a [redacted]
[redacted] He [redacted] was in charge of [redacted]

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

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

File # 56C-LA-227506-27

Date dictated

by SA [redacted] dcs

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56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 2/27/02

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[REDACTED] claimed not to have any knowledge how the GALA was funded.

[REDACTED] was a [REDACTED] from the HILLARY CLINTON U.S. SENATE CAMPAIGN. [REDACTED] to oversee the production of the GALA. He [REDACTED] worked closely with [REDACTED] and [REDACTED] let [REDACTED] [REDACTED] did not have a lot of dealings with [REDACTED]. He [REDACTED] did ask [REDACTED] for assistance to [REDACTED]

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[REDACTED] claimed that he never had any discussions concerning the funding of the GALA or any other campaign finance issues with [REDACTED] and [REDACTED] would usually meet [REDACTED]. These meetings often took place outside of SLM offices. [REDACTED] maintained an office at SLM from approximately [REDACTED]. He [REDACTED] was still at SLM when [REDACTED] believed that [REDACTED] in arranging the luncheon at Spago Restaurant, and the tea at the home of CYNTHIA GERSHMAN in June 2000. [REDACTED] was invited to these events, but he did not attend. He [REDACTED] did believe that both of those events were fundraisers for HILLARY CLINTON's Senate Campaign. [REDACTED] also did not attend a tea host by CHER or a dinner at the home of [REDACTED]. [REDACTED] both were held in late September 2000. [REDACTED] did attend both the GALA concert and the dinner afterwards.

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

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

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[REDACTED] the idea of a Medal of Freedom for STAN LEE. He [REDACTED] believed that LEE was more aware of [REDACTED] activities than he (LEE) had led on. [REDACTED] 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 [REDACTED]

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[REDACTED] expressed his [REDACTED] was closely involved in production of the GALA. He was also had a

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DATE 3/26/02-Retr Rail

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- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 03/21/2002

[redacted] date of birth [redacted] home address [redacted] telephone number [redacted] Social Security Number [redacted] [redacted] 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, [redacted] provided the following information:

[redacted] is currently employed as an [redacted] primarily of [redacted]. He owns a company called [redacted].

[redacted] 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. [redacted] advised that he was sure that this tea was a fundraising event.

[redacted] NEW YORK SENATE 2000, was responsible for raising money for the event. [redacted] was not involved with the tea. [redacted] indicated that [redacted] at this time, was running out of money. During the tea, [redacted] spoke and [redacted] introduced HILLARY CLINTON. CHER also spoke during the event. [redacted] advised that he may have paid some of the bills for the tea. [redacted] was the [redacted] (telephone [redacted] was the [redacted] for the event.

[redacted] stated that he spent most of the day with HILLARY CLINTON on [redacted]. That evening, [redacted] held a fundraising dinner for NEW YORK SENATE 2000. [redacted] does not like [redacted] because he [redacted].

[redacted] was also not involved in the planning of that dinner. However, [redacted] believed that [redacted] was involved in raising money for the event. SPAGO may have catered the dinner. [redacted] stated that he had nothing to do with this event.

[redacted] advised that he [redacted] tickets for the tea held at CYNTHIA GERSHMAN's residence on June 9, 2000. It was supposed to be a fundraising event. [redacted] recalled that he

Investigation on 3/20/02 at Los Angeles, CA

File # 56C-LA-227506-30

Date dictated

by SA [redacted]
SA [redacted]

56C-LA-227506

Continuation of FD-302 of [REDACTED]

On 3/20/02, Page 2

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[REDACTED] for NEW YORK SENATE 2000 during the GERSHMAN tea. At that event, he [REDACTED] to NEW YORK SENATE 2000. In addition, [REDACTED] his wife [REDACTED] STAN LEE, his wife JOAN LEE, possibly [REDACTED] and [REDACTED] donated money. [REDACTED] believed that [REDACTED] was also raising money through this event. However, he [REDACTED] did not have direct knowledge if [REDACTED] raised any money.

[REDACTED] was at the offices of STAN LEE MEDIA (SLM) [REDACTED] during the planning of the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA). During this time,

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[REDACTED] drove a [REDACTED] named [REDACTED] is the wife of [REDACTED] is currently under investigation by the Los Angeles Police Department for [REDACTED]. A detective named [REDACTED] telephone number [REDACTED] interviewed [REDACTED] about [REDACTED]

[REDACTED] paid his [REDACTED] bill with his [REDACTED]. However, [REDACTED] then reimbursed [REDACTED] for the [REDACTED] expenses. [REDACTED] could not recall how he reimbursed [REDACTED] told [REDACTED] never to tell anyone about [REDACTED]

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[REDACTED] that were given to the CLINTONS during the GALA from [REDACTED] is a [REDACTED] who has a [REDACTED]. She has telephone numbers of [REDACTED] and [REDACTED]

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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.

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[REDACTED] advised that the check from [REDACTED] to [REDACTED] in the amount of [REDACTED] was to repay [REDACTED] [REDACTED] had with [REDACTED] wrote the check to [REDACTED] for [REDACTED]

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 03/27/2002

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

[redacted] is the owner of [redacted]
 [redacted] he has been in business for
 approximately [redacted] specializes in assisting
 individuals in [redacted]
 [redacted] He is also
 involved in [redacted] including the various [redacted]
 [redacted] throughout the World. [redacted] also [redacted]

[redacted] His clients, including [redacted]
 [redacted] pay a monthly retainer for his services. In addition,
 [redacted] will receive a fee for [redacted]
 On occasion, [redacted]

[redacted] became involved with STAN LEE MEDIA (SLM) when he
 was [redacted] He [redacted] did not
 know the time frame for this [redacted] However, it was
 when SLM had [redacted] possibly in late [redacted]
 [redacted] has known [redacted] for about [redacted] He first
 met [redacted] at [redacted] was with his client [redacted]
 [redacted] asked [redacted] if he [redacted] After the
 [redacted] called [redacted] to [redacted] He
 and [redacted] then developed a friendship, and [redacted]
 [redacted] had heard negative things about [redacted] It was
 believed that [redacted] had [redacted]
 [redacted] had been [redacted] 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 [redacted] Tds

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY

Date: 05/15/2002

To: Washington Field

Attn: Public Corruption Squad

From: Los Angeles

WCC-6

Contact: SA [REDACTED]

Approved By: [REDACTED] *g*

Drafted By: [REDACTED] *DCS*

Case ID #: 56C-LA-227506 (Pending)-38

Title: [REDACTED]

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 [REDACTED] 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 [REDACTED]

[REDACTED]. In [REDACTED]

56C-LA-227506-38

file: 135dsol.02

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FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY

Date: 07/09/2002

To: Chicago

Attn: Public Corruption Squad

Washington Field

Squad C-20

Criminal Investigative

Public Corruption Unit
SSA [redacted]

From: Los Angeles

WCC-6

Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

C: dcs

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

Title: [redacted] et al;
NEW YORK SENATE 2000;
CAMPAIGN FINANCE LAW VIOLATIONS;
OO: 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 [redacted] of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was

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56C-LA-227506

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY

Date: 08/19/2002

To: Chicago

Attn: Squad WC-3

SSA [REDACTED]

SA [REDACTED]

Criminal Investigative

Attn: Public Corruption Unit

SSA [REDACTED]

From: Los Angeles

WCC-6

Contact: SA [REDACTED]

Approved By: [REDACTED] *LLP*

Drafted By: [REDACTED] *DS*

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

Title: [REDACTED] et al;
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 [REDACTED] 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

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

Total Deleted Page(s) = 9

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Page 9 ~ Duplicate;
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- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/05/2002

Individual (hereafter referred to as Source), who has agreed to testify was interviewed. Also participating in the interview were [redacted] Public Integrity Section, [redacted] Election Crimes Branch, and the Source's attorney. Source provided the following information:

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Source advised that [redacted] "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 [redacted] the GALA along with a STAN LEE MEDIA (hereafter referred to as "SLM")

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[redacted] SLM paid expenses related to the GALA. Source also recalled that [redacted] named CYNTHIA GERSHMAN also paid expenses. GERSHMAN gave lots of money for Democratic causes, and was [redacted] 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 [redacted] may have spent at least [redacted] Source estimated that the entire GALA [redacted] 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.

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b7DInvestigation on 7/31/02 at Washington D.C.File # [redacted] 56C-LA-227506 172 Date dictated _____

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by SA [redacted] dcsb6
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[REDACTED] 56C-LA-227506

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Continuation of FD-302 of Source, On 7/31/02, Page 3

[REDACTED]

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Source did not believe that anyone [REDACTED]

[REDACTED]

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

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[REDACTED] 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 [REDACTED] still have a good
relationship. [REDACTED]

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Source himself still

He has been [REDACTED]

[REDACTED]
[REDACTED] Source advised that it would be very
unusual for [REDACTED]

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 SLM. Source believed that LEE had donated to other
political candidates and causes in the past. CYNTHIA GERSHMAN is a
very wealthy widow who [REDACTED]

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[REDACTED]. GERSHMAN's [REDACTED]

Source indicated that [REDACTED]

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[REDACTED] He (Source) was not involved in the [REDACTED]

[REDACTED] stayed at [REDACTED]

[REDACTED]

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 09/26/2002

To: New York

Attn: Squad C-14 - Public Corruption
A/SSA [REDACTED]

From: Los Angeles
WCC-6

Contact: SA [REDACTED]

Approved By: [REDACTED] *LP*

Drafted By: [REDACTED] *DS*

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

Title: [REDACTED] et al;
New York Senate 2000;
Campaign Finance Violations;
OO: Los Angeles

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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 [REDACTED] of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was

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file: 273d501.02

56C-LA-227506

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 09/30/2002

To: San Francisco

Attn: Oakland RA

From: Los Angeles

WCC-6

Contact: SA [REDACTED]

Approved By: [REDACTED] *APK*

Drafted By: [REDACTED] *TOG*
DCS

Case ID #: 56C-LA-227506 *45* (Pending)

Title: [REDACTED] et al;
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 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 [REDACTED] 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.

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file: 273ds02.02

56C-LA-227506

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY

Date: 11/14/2002

To: [redacted]
International Operations
Criminal Investigative

Attn: Legat
Public Corruption Unit
SSA [redacted]

From: Los Angeles
WCC-4

Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted] JCS

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

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

Synopsis: Request Legat [redacted] assistance to interview [redacted]
and [redacted]

Enclosure(s): For Legat [redacted] copy of list of questions for
[redacted] and [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 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 [redacted] of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was

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File: 319d501.02

file copy
56C-LA-227506

To: [redacted] From: Los Angeles
Re: 56C-LA-227506, 11/14/2002

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that a [redacted] named [redacted] was a major investor in SLM. [redacted] is the [redacted] In [redacted] and his [redacted] named [redacted] to meet with [redacted] and STAN LEE. On August 12, 2000, [redacted] and [redacted] attended the GALA. It has been alleged by [redacted] that [redacted] made a [redacted] contribution to NEW YORK SENATE 2000 [redacted] Video taken during the GALA showed that [redacted]

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Investigation has also revealed that [redacted] established a relationship with [redacted] E-mails seized from SLM showed that [redacted] and [redacted] In [redacted] INS records revealed that [redacted] and [redacted] attended [redacted] It has been alleged that [redacted] is believed to be [redacted] At the current time, not much details about [redacted] background has been developed.

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Legat [redacted] is requested to locate and interview [redacted] and [redacted] about their relationship with [redacted] SLM, [redacted] and others. Specifically, to determine whether [redacted] 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 [redacted] at [redacted] if any questions arise about these interviews.

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Descriptive Data:

Main Subject

Name -

Last:

First:

Race:

Sex:

DOB:

POB:

PNO:

Address(es) -

House #:

Street Name:

City:

State:

Postal Code:

Country:

Phone #:

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Questions for [redacted]

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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 [redacted] Nature of business? Position with the company? How did you become involved in the company?

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Relationship w/Stan Lee Media

4. How did you first become aware of SLM?
5. Who was your primary contact at SLM? [redacted] Stan Lee?
6. How did you first meet [redacted]
7. What did you know about [redacted] 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 [redacted] 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?

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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

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 12/20/2002

To: Chicago

Attn: Squad WC-3

SSA [REDACTED]

Squad WC-2

SA [REDACTED]

Washington Field

Squad CR-15

SSA [REDACTED]

SA [REDACTED]

New Orleans

Squad 4

SSA [REDACTED]

SA [REDACTED]

Criminal Investigative

Public Corruption Unit

SSA [REDACTED]

SAC

Los Angeles

From: Los Angeles

WCC-4

Contact: SA [REDACTED]

Approved By: [REDACTED] *des*

Drafted By: [REDACTED] *des*

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

Title: [REDACTED]

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

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

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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 [redacted] 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. [redacted]

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[redacted] is currently in [redacted]. In addition, [redacted] is [redacted]. In the early [redacted]

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 \$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.

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

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

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[redacted] In addition, [redacted] also [redacted]

At the present time, [redacted] is the [redacted]

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[redacted] The location of [redacted] offices is [redacted]

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 [redacted] off: [redacted]
cell: [redacted]

Preparer Of Urgent Report: SSA [redacted] Squad WCC-4

Subject: [redacted]
New York Senate 2000;
Campaign Finance Law Violations;
OO: Los Angeles
56C-LA-227506-111

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Description Of Matter:

RECENT DEVELOPMENTS

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OTHER Sealed Court Order

[redacted]

[redacted]

Simultaneous to [redacted] agents from LAFO and Washington Field Office
will issue grand jury subpoenas [redacted]

[redacted] The subpoenas will be to
[redacted] Furthermore, two employees of New York

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SPB

012401.03

Senate 2000 Urgent Report 2

Senate 2000, identified as [REDACTED]

[REDACTED] will be interviewed.

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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 [REDACTED] of an Internet media company called Stan Lee Media (SLM).

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The LAFO 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 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.

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

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[REDACTED] In addition [REDACTED]
[REDACTED]

At the present time [REDACTED]

[REDACTED] The location of [REDACTED] Investigation has revealed that [REDACTED]
[REDACTED]

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In [REDACTED] a cooperating witness (CW), who is [REDACTED]
[REDACTED]

[REDACTED] During proffer sessions, the CW provided important evidence of wrongdoing [REDACTED]

[REDACTED] The CW also provided information about [REDACTED]

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FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY

Date: 01/29/2003

To: Los Angeles
Washington Field Office

Attn: SAC
SAC
NVRA

New York

SSA [redacted]
SAC

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Criminal Investigative

Long Island RA
SSA [redacted]
Public Corruption Unit
SSA [redacted]

From: Los Angeles *WCC-4*
WCC-4

Contact: SA [redacted]

Approved By: [redacted] *WCC-4*
Drafted By: [redacted] dcs

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

Title: [redacted] et al;
New York Senate 2000;
Campaign Finance Law Violations;
OO: Los Angeles

Synopsis: Request permission for SA(s) [redacted] and [redacted] 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.

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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, 01/29/2003

The GALA was hosted by comic book legend STAN LEE and [redacted] 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. [redacted]

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[redacted] is currently in [redacted] In addition, [redacted] is [redacted] In the early [redacted]

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 \$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 [redacted]

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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 [redacted]

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[redacted] In addition, [redacted] also [redacted]

At the present time, [redacted]

The location of [redacted]

[redacted] In addition, federal grand [redacted]

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 04/01/2003

To: Los Angeles

Attn: SAC

ASAC

New Orleans

Attn: SAC

SSA

SA

Criminal Investigative

Public Corruption Unit

SSA

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From: Los Angeles

WCC-4

Contact: SA

Approved By:

Drafted By:

Case ID #: 56C-LA-227506-133 (Pending)

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

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Synopsis: Request permission for SA(s) [redacted] and [redacted] 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.

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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.

File: 091 d501.02

56C-LA-227506

To: Los Angeles From: Los Angeles
Re: 56C-LA-227506, 04/01/2003

The GALA was hosted by comic book legend STAN LEE and [redacted] 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. [redacted]

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[redacted] is currently in [redacted]. In addition, [redacted] is [redacted]. In the early [redacted] [redacted]

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 \$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 (DSCC). In addition, the investigation has revealed that [redacted]

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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.

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

[redacted] In addition, [redacted] also [redacted]

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

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[redacted] During these proffer

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 04/08/2003

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

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

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[redacted]
[redacted] explained that he did not [redacted]
received the [redacted]
[redacted] told him that [redacted]
wanted to talk to him. [redacted]
[redacted] Finally, the [redacted]
[redacted] Again, [redacted] did not
respond [redacted] also

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

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Investigation on [redacted] California

b6
b7C
b7DFile # 56C-LA-227506-134

Date dictated _____

by SA [redacted]
SA [redacted]

rjdj

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On [REDACTED]

, Page 2

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[REDACTED] stated that [REDACTED] has also been [REDACTED]

The last time that [REDACTED] talked to [REDACTED] was at the [REDACTED] that he has discussed in the past. [REDACTED] indicated that [REDACTED] told him [REDACTED]

[REDACTED] involving the HOLLYWOOD GALA SALUTE. It was paid by a STAN LEE account or by [REDACTED] [REDACTED] also explained that for the whole time that [REDACTED]

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[REDACTED] planned to have [REDACTED] at the event (HOLLYWOOD GALA SALUTE). [REDACTED] explained that [REDACTED] had told him that [REDACTED] and [REDACTED] knew about it. [REDACTED] indicated that he knew [REDACTED] knew about the [REDACTED] (Also, [REDACTED] knew that this was happening because he was [REDACTED]

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[REDACTED] to STAN LEE MEDIA and then was used for the GALA. [REDACTED] would be a good witness because she [REDACTED]

[REDACTED] is not sure if he knows much. [REDACTED] was not sure how [REDACTED] but knows it was given to STAN LEE MEDIA. Also, [REDACTED] was trying to [REDACTED]

[REDACTED] is no longer keeping in touch with [REDACTED] [REDACTED] has not talked to her [REDACTED]

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

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[REDACTED] indicated that he has not talked anymore to anyone else about [REDACTED] is not sure what [REDACTED] will talk to him about. [REDACTED] use to [REDACTED]

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On [REDACTED]

, Page 3

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[REDACTED] explained that STAN LEE MEDIA [REDACTED]
[REDACTED] STAN LEE MEDIA gave [REDACTED]
[REDACTED]

[REDACTED] However, eventually
[REDACTED] indicated that he has [REDACTED]
[REDACTED]

[REDACTED] also paid for [REDACTED]
[REDACTED]

[REDACTED] Recently, [REDACTED]
has contacted [REDACTED]
[REDACTED].

[REDACTED] also pointed out that [REDACTED] knew about the
[REDACTED]
[REDACTED] explained that [REDACTED]
[REDACTED]

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[REDACTED] worked with [REDACTED]
[REDACTED] explained that [REDACTED] knew everything
and specifically talked about [REDACTED]

[REDACTED] also knew that STAN LEE MEDIA paid for [REDACTED]
[REDACTED]
[REDACTED] paid for their [REDACTED]
[REDACTED]

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[REDACTED] Also, [REDACTED] knew that [REDACTED] paid [REDACTED]
[REDACTED] Also, [REDACTED]
[REDACTED]

[REDACTED] The deal was [REDACTED]
[REDACTED]
[REDACTED] indicated that others were also [REDACTED]
[REDACTED]

Also, the [REDACTED]
[REDACTED] contacted [REDACTED] and requested [REDACTED]
in order to [REDACTED] said that [REDACTED]
[REDACTED]

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[REDACTED] explained that STAN LEE wants [REDACTED] a
[REDACTED]
[REDACTED]

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[REDACTED] Also, [REDACTED] explained that [REDACTED]
[REDACTED]

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 05/05/2003b6
b7C

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

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

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

Investigation on 4/30/03 at Washington D.C.File # 56C-IA-227506-13A

Date dictated _____

by SA [redacted]
SA [redacted]b6
b7C56C-IA-227506-13A Substantive
Serial -139

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 4/30/03

, Page 3

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[REDACTED] was not involved in the planning of the HOLLYWOOD GALA SALUTE TO PRESIDENT WILLIAM JEFFERSON CLINTON (GALA). However, [REDACTED]

[REDACTED] In late [REDACTED] to a fundraiser in Chicago. Following the event, she went [REDACTED] and others. [REDACTED]

[REDACTED] could not recall much about the Chicago fundraiser. She did not know if [REDACTED] had paid for any of the expenses nor did she have any information on who actually hosted that event.

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A day or so before the GALA, [REDACTED] and others did a [REDACTED] During this [REDACTED] She looked at the [REDACTED] when she first saw the [REDACTED] she did not recall that anybody expressed any concerns about the opulence of the event. [REDACTED] and [REDACTED] were also [REDACTED] was the [REDACTED] and [REDACTED] was [REDACTED] [REDACTED] stated that she only vaguely recalled a meeting [REDACTED] She did not remember any discussions about problems with [REDACTED] did not know [REDACTED] She was familiar with [REDACTED] however, [REDACTED] did not recall [REDACTED] was pretty sure that [REDACTED] also attended [REDACTED] It is possible that [REDACTED]

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[REDACTED] than he had informed [REDACTED] about, and that would [REDACTED] attended the GALA on August 12, 2000. [REDACTED] STAN LEE, and [REDACTED] produced the GALA. However, [REDACTED] was not sure who actually paid for the event. [REDACTED] was in the [REDACTED] in charge of the GALA, and he was responsible for [REDACTED] Other campaign staffers who worked with [REDACTED] included [REDACTED] and [REDACTED]

[REDACTED] stated that she first met [REDACTED] during the GALA. However, it was possible that she had met him during the [REDACTED] advised that she did not know how much

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FEDERAL BUREAU OF INVESTIGATION
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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 05/31/2001

To: Criminal Investigative

Attn: Public Corruption Unit
SSA [redacted]

From: Los Angeles

WCC-6

Contact: SA [redacted]

Approved By: [redacted] *RLC*

Drafted By: [redacted] *DCS*

Case ID #: 56C-LA-213514 *154* (Pending)

Title: [redacted]

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 [redacted] and one (1) FD-302, dated May 10, 2001 of telephonic interview with [redacted]

Details: On May 6, 2001, an interview was conducted with [redacted] [redacted] was a [redacted] 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 [redacted] STAN LEE is a well-known comic book creator, and the founder of STAN LEE MEDIA. [redacted] is LEE's [redacted] and he was [redacted] [redacted] is also [redacted] The event [redacted] was named [redacted] responsibility was to handle the [redacted]

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

UPLOADED BY *lm*

DATE *6/8/01 - Robin Reed*

36-LA-22386-159

Judicial Watch 56C-LA-213514-5

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 12/29/2004

To: Los Angeles
Seattle

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

Criminal Investigative

From: Los Angeles
WCC-4

Contact: SA [REDACTED]

Approved By: [REDACTED] LJC/KUP

Drafted By: [REDACTED] JCS

Case ID #: 56C-LA-227506 (Pending) -170

Title: [REDACTED]

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 [REDACTED] of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was

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56C-LA-227506-170

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 12/23/2004

[redacted] 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 [redacted] from the Eastern District of New York and United States Department of Justice, Public Integrity Section (USDOJ-PIS), attorneys [redacted] and [redacted] was represented by his attorney [redacted]. After being advised as to the identity of the interviewing agents and the nature of the interview, [redacted] provided the following information:

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

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

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[redacted] provided some background about his relationship with [redacted] was first introduced to [redacted] in [redacted]

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[redacted] successful in convincing various celebrities to attend these events. [redacted] advised that [redacted]

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b7DInvestigation on 12/20/2004 at [redacted]File # 56C-LA-227506-197Date dictated —by SA [redacted]
SA [redacted]

56C-LA-227506-197

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 12/20/2004 , Page 2

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[REDACTED]

[REDACTED] his efforts with the Democratic Party. [REDACTED] primary goal was trying to get STAN LEE [REDACTED]

[REDACTED] advised that his first foray into Democratic politics during the 2000 election cycle was an event that [REDACTED] It was held on [REDACTED] in Hollywood. [REDACTED] he made a [REDACTED] contribution to the Democratic National Committee during that event. He [REDACTED] It was at this dinner that [REDACTED] introduced to a number of Democratic party officials including [REDACTED] [REDACTED] advised that he briefly met PRESIDENT WILLIAM CLINTON at this dinner. [REDACTED]

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[REDACTED]

[REDACTED] appeared to have some kind of pull with the President.

[REDACTED]

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

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[REDACTED] official recognition for STAN LEE. [REDACTED]

[REDACTED] to discuss planning a fundraising event. [REDACTED] to meet and financially support the Presidential campaign of AL GORE.

[REDACTED] recalled that he attended a fundraiser at the home of [REDACTED] He met HILLARY CLINTON at this event. [REDACTED]

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56C-LA-227506

Continuation of FD-302 of [REDACTED], On 12/20/2004, Page 3

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[REDACTED] However, at that time, [REDACTED] did not know [REDACTED]. It was the first time they [REDACTED] had ever met. [REDACTED] believed that [REDACTED] contribution was made during that event. However, he could not recall the check. It was possible that he [REDACTED] gave the check to STAN LEE.

[REDACTED] met PRESIDENT CLINTON and HILLARY CLINTON during an event [REDACTED]. At that time, [REDACTED] advised that he had pictures taken [REDACTED] has tried to obtain copies of those photographs. [REDACTED]

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

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[REDACTED] 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 [REDACTED] campaign fundraising events. [REDACTED]

[REDACTED] for [REDACTED] HILLARY CLINTON campaign. He [REDACTED] pledged [REDACTED] for each campaign. [REDACTED]

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[REDACTED] commitment to HILLARY CLINTON's Senate campaign during [REDACTED] a tea held at the home of CYNTHIA GERSHMAN [REDACTED] recalled that he had a conversation [REDACTED] during these fundraisers. [REDACTED] support HILLARY's campaign and [REDACTED]

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56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 12/20/2004 , Page 6

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[REDACTED]
[REDACTED] had been previously given some background about the proposed GALA.
[REDACTED]

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

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[REDACTED] considered a [REDACTED]
[REDACTED] for SLM.

[REDACTED] SLM executives had told [REDACTED]
[REDACTED] SLM was not involved in the planning of the GALA, and [REDACTED]
[REDACTED] On numerous occasions, [REDACTED]

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[REDACTED] was aware of the expenses for printing and postage. [REDACTED]
possible witnesses to some of [REDACTED] including [REDACTED]
[REDACTED]

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

[REDACTED] 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 [REDACTED]
[REDACTED]

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[REDACTED] was unfamiliar with NEW YORK SENATE 2000.
[REDACTED]
[REDACTED]

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[REDACTED] were aware of everything that was going on with the GALA. He [REDACTED]

56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 12/20/2004 , Page 9

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[REDACTED]

[REDACTED] During this fundraiser, [REDACTED] he spoke with the President, HILLARY CLINTON, and [REDACTED]

[REDACTED]

[REDACTED] working with STAN LEE [REDACTED] the PRESIDENT was grateful for the help and the contribution to HILLARY's campaign. [REDACTED] not recall if [REDACTED] attended [REDACTED] event. During the event, [REDACTED] was introduced by PRESIDENT CLINTON as [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED] indicated that he was embarrassed and surprised about the revelations about [REDACTED] relationship with the CLINTONS. After the Washington Post articles appeared, [REDACTED] maintained a relationship with [REDACTED]

[REDACTED]

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[REDACTED] advised that the only contact [REDACTED] had with [REDACTED] after the GALA was [REDACTED]

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 04/11/2005

[redacted] address [redacted] New York City,
New York, telephone [redacted] date of birth [redacted]
[redacted] was interviewed at her place of employment [redacted]
[redacted] This interview had been prearranged telephonically.
Participating in the interview was Department of Justice, Public
Integrity Section, trial attorney [redacted] was
represented by her attorney [redacted] After being advised as to
the identity of the interviewing agent and the nature of the
interview, [redacted] provided the following information:

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[redacted] is currently employed as [redacted]
[redacted]
[redacted] Prior to her employment
with [redacted] a New York
fundraiser. She has previously worked as a fundraiser for [redacted]
[redacted]
she was hired [redacted] for the HILLARY RODHAM
CLINTON FOR UNITED STATES SENATE campaign. [redacted]
she was hired before [redacted] was hired in [redacted]
[redacted]
[redacted] did not know him
nor work with him. In addition, she did not really work with him
during the 2000 election. [redacted]
[redacted] was responsible for all [redacted]
[redacted] Overall, [redacted] and
[redacted] got along well [redacted]

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[redacted] advised that [redacted] 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. [redacted] 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.

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Investigation on 3/31/05 at New York City

File # 56C-LA-227506-198 Date dictated

by SA [redacted] dcs

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56C-LA-227506

Continuation of FD-302 of [REDACTED]

, On 3/31/05

, Page 3

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[REDACTED] 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. [REDACTED] staff included [REDACTED] and [REDACTED] was [REDACTED] main staff member. [REDACTED] primarily used fundraising consultants [REDACTED] to help him with events. [REDACTED] 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. [REDACTED] 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 [REDACTED] who were at the convention. [REDACTED]

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[REDACTED] did not have interaction with [REDACTED]. However, she heard about [REDACTED] from [REDACTED] and [REDACTED]. [REDACTED] did not know much about STAN LEE MEDIA. She had heard of STAN LEE because of LEE's background at Marvel Comics. [REDACTED] had never heard of [REDACTED] and never met him. She indicated that the GALA was not the typical fundraising event. [REDACTED] 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 a Arthur Schlesinger book about Presidents. Overall, [REDACTED] believed that the GALA was an "ridiculously expensive event." In the weeks after the GALA, [REDACTED] 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.

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

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[REDACTED] recalled that the campaign had to pay for [REDACTED]. Initially, she believed that [REDACTED] would pay for the expense. [REDACTED] but eventually the campaign paid the bill. This occurred after the election was over.

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Universal Case File Number 566-LA-227506-1A6

Field Office Acquiring Evidence LA

Serial # of Originating Document _____

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Description: ☒ Original notes re interview of
302 - 8/31/01

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b7C

10/18/01-emj

Gershman 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 extend. her loans.

[redacted] at SLM → not sure about GALA
- knows worked [redacted]

Stan Lee - not actively involved in the event
Don't know about financial support [redacted]
making all decisions

Doesn't know how
believed it was to support H Clinton vs
Senate Campaign

FEDERAL BUREAU OF INVESTIGATION

Date of transcription

Investigation on

at

File #

Date dictated

by

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STAN LEE, date of birth 12/28/1922, social security account number [REDACTED] 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, [REDACTED] (telephonic) and [REDACTED] both of the law firm of SKADDEN, ARPS, SLATE, MEAGHER & FLOM. [REDACTED] 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:

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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 [REDACTED] approximately [REDACTED] ago. [REDACTED] called LEE out of the blue [REDACTED] [REDACTED] said that [REDACTED] [REDACTED] 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, [REDACTED] asked LEE to [REDACTED] LEE agreed. Over the next several years, [REDACTED] at which LEE got to meet celebrities and other famous persons.

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

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07/10/2002 Los Angeles, California

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

SA [REDACTED] kjh

SA [REDACTED]

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

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

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When LEE and [REDACTED] were getting ready to start SLM, LEE suggested that the company lease office space near to LEE's home. [REDACTED] rejected the idea and convinced LEE to use pre-existing office space in [REDACTED] California, that [REDACTED]

[redacted] was already working for [redacted] at the time that SLM was formed. LEE met [redacted] at the [redacted] offices. [redacted] said that [redacted] was the greatest and smartest person that [redacted] had ever met. [redacted] said that [redacted] pulled [redacted] [redacted] was devoted to [redacted] and did whatever [redacted] asked him to do. [redacted] was the [redacted] [redacted] did everything except make the decisions. Rather, it was [redacted] who [redacted]

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LEE does not know much about [redacted] other business ventures. LEE is aware that [redacted] had a [redacted] called [redacted] but [redacted] never really got off the ground. [redacted] was another [redacted] company that was somehow related to [redacted] [redacted] also had companies named [redacted] although LEE is not sure what these companies were for. [redacted]

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_____ was a nice person and a SLM investor. _____ lost a lot of money in SLM. _____ owned an _____. _____ 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.

[redacted] is the [redacted] and was a [redacted] LEE met [redacted] on two (2) occasions. Once, [redacted] came to the SLM office and was introduced to LEE. The second meeting occurred when [redacted] came to the SLM offices and [redacted] SLM's board of directors or its executives about an [redacted]

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

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On several occasions, LEE asked [redacted] what was the use of having \$90 million worth of stock if LEE could not get any of the money. [redacted] said that LEE could not [redacted] [redacted] said it would [redacted]

[redacted] said that LEE should do what [redacted] That is, [redacted] advised LEE to [redacted] [redacted] said that LEE should [redacted] LEE had never borrowed anything in his life, and he said that he was not comfortable borrowing on the stock. LEE said that he was worried about owing the money if anything ever went wrong. [redacted] responded that LEE [redacted]

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[redacted] never specifically said that he was [redacted] [redacted] but LEE got the definite impression that [redacted] was doing precisely that. [redacted] implied that LEE [redacted] Additionally, LEE assumes that [redacted] was borrowing on the stock because [redacted] was [redacted] during this time period, including [redacted]

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There was a very careful focus on the price of the SLM stock, and [redacted] and [redacted] were always very [redacted] [redacted] At one point, when the stock price began to go down -- possibly in February or March of 2000 -- [redacted] complained that [redacted] said he was [redacted]

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

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[REDACTED]

LEE was not aware of any cash crunch or financial problems at SLM until well after [REDACTED] was hired as SLM's new [REDACTED] was hired at the urging of [REDACTED] who said that he [REDACTED] wanted to be [REDACTED]

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Despite the fact that it was [REDACTED] to hire [REDACTED] and [REDACTED]. At one point, both [REDACTED] and [REDACTED] were advocating that [REDACTED] LEE did not yet realize that [REDACTED] was [REDACTED] and so he was focused on trying to shore up [REDACTED] between [REDACTED] and [REDACTED]. Eventually, [REDACTED] convinced the board to [REDACTED]

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[REDACTED] spent a great deal of time and effort trying to [REDACTED] was disappointed in the [REDACTED] including [REDACTED] and SLM's [REDACTED]. There were many instances where [REDACTED] asked LEE to [REDACTED]

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LEE recalls that MACROMEDIA invested \$5-\$10 million into SLM. MACROMEDIA was introduced to SLM through [REDACTED] a [REDACTED] VENTURE SOFT was another company that was going to invest in SLM, but the deal fell through when VENTURE SOFT's [REDACTED] ran into financial troubles of his own. LEE became relatively close with [REDACTED] during trips that LEE made to [REDACTED]. LEE and [REDACTED] still correspond on occasion. LEE is not familiar with companies named MAXI or SANTO.

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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, [REDACTED] 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. [REDACTED] 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.

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

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There are two (2) occasions when LEE entered into [redacted] On one occasion, LEE and [redacted] [redacted] 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 [redacted] and written on the MERRILL LYNCH account of a company called EXCELSIOR PRODUCTIONS. LEE confirmed that these checks reflect the transaction that LEE [redacted]

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[redacted] did not offer any explanation for why [redacted] [redacted] Rather, [redacted] said that he [redacted] from LEE. When LEE said that he did not have [redacted] [redacted] assured LEE that [redacted] LEE cannot recall whether [redacted] or whether [redacted] gave him [redacted] In any case, LEE rushed the check to the bank and was relieved when the check cleared. LEE was not worried that [redacted] 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 [redacted] [redacted] LEE figured that it had something to do with taxes, but he never asked. LEE was completely trusting of [redacted] did not give any indication that he was having financial problems at the time that [redacted] Rather, [redacted] seemed to be doing extremely well in his [redacted] LEE assumed that the transaction was a business matter, and not a matter involving [redacted] personally.

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The [redacted] that LEE entered into with [redacted] concerns a [redacted] LEE gave to [redacted] LEE [redacted] company named [redacted] said that he needed [redacted] said that LEE would [redacted] LEE did not have [redacted] This is the one and only time that LEE borrowed money.

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

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The document is signed by [redacted] and contains a signature date of [redacted]

LEE does not know why [redacted] LEE also has no idea why the [redacted] rather than [redacted] was a person who was somehow connected to [redacted] used to take credit for [redacted] [redacted] said that [redacted] was [redacted] was an unpleasant man who always seemed to be around celebrities and famous people. LEE does not know what [redacted] did to attract these types of people, considering that he was neither well-spoken nor good-looking.

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[redacted] to CYNTHIA GERSHMAN, the woman referenced in the above document. GERSHMAN was a rich widow. [redacted] and [redacted] both sought to [redacted]

After LEE received the above [redacted] he contacted GERSHMAN. GERSHMAN said that she did not have anything to do with [redacted]

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LEE does not know whether SLM employees had accounts with [redacted]. LEE was not close to either [redacted] or [redacted]

When LEE and [redacted] formed SLM, LEE received approximately 1% more shares than [redacted]. LEE received 3.6 million shares and [redacted] received [redacted]. 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 [redacted] that the shares were not worth anything to him, [redacted] advised LEE to [redacted]. [redacted] said that it would [redacted]. LEE acted on [redacted] advice and [redacted]. LEE's [redacted]. LEE does not know whether [redacted] ever sold shares in SLM. LEE assumed that [redacted] only borrowed on the shares.

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LEE has never heard of [redacted]. LEE absolutely never authorized [redacted] 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.

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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 [redacted] and contain [redacted] signatures. [redacted] said that he once saw [redacted] but LEE does not know whether it was [redacted] or [redacted] who was signing LEE's name. Many of these equipment sellers are suing LEE despite the fact that the signatures are plainly forged.

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Neither [redacted] nor [redacted] ever admitted any wrongdoing to LEE. The last time that LEE spoke to [redacted] was when LEE walked into [redacted] office to [redacted]

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Sometime after SLM had closed its offices, LEE attended a meeting with [] and his attorney. [] also attended the meeting. LEE does not recall any substantive comments by []

[] 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 [] 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 [] 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 [] 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.

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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 [] during one of the events of the day or whether he mailed it in after the fact. LEE assumes that [] asked LEE to make the contribution.

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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, [] was the []

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[] The Gala was held at the estate of KEN ROBERTS. LEE assumed that GERSHMAN was underwriting the cost of the event, although [] never discussed the [] with LEE. The one thing that [] did focus on was [] 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 [] 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 [] told him that he [] LEE would not have paid as much attention to the disbursement if it came from the SLM account, rather than

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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 [redacted] asked him [redacted] [redacted] 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 [redacted] After the GALA, LEE recalls that [redacted] tried to [redacted] [redacted] This was a typical maneuver by [redacted] who would always [redacted] [redacted]

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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 [redacted] and [redacted] LEE does not know [redacted] BLACK INK PRODUCTIONS [redacted] or [redacted] LEE never sat in on any planning meetings relating to the Gala.

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

LEE was surprised when he received the [redacted] [redacted] from [redacted] [redacted] in which [redacted] warned LEE to [redacted] [redacted] also warned LEE [redacted] [redacted] finally said that [redacted] [redacted]

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LEE is familiar with the name [redacted] 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 [redacted] may have had with SLM. LEE did not have any dealings with [redacted] or his firm. LEE was not aware that [redacted] engaged in [redacted]

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or that he issued research reports for companies. LEE does not know any companies that were promoted or covered by [REDACTED] or his firm.

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[REDACTED] LEE is not familiar with the names E.D. WALKER or [REDACTED]

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Field Office Acquiring Evidence LA

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☐ Yes ☒ No

Title: New York Senate 2000

Hollywood Gala

Reference: _____
(Communication Enclosing Material)

Description: ☒ Original notes re interview of

302 8/21/01

10/18/01-RM

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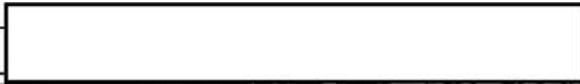
56C-LA-227506-1A4

5/24/91

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Reprinted to



Did not know about Mari-Santos

Repaired.



worked at SLM

[redacted] American Spirit Found.

[redacted] this group - gave

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wards to celebs. [redacted]

[redacted] American Spirit + Language

Solutions - had offices at SLM

Non-profit was defunded,

[redacted] kept [redacted]

Stan donated his desk - money went
to ASF. Unaware of what status is
or where they gave \$.

[redacted]
New York Senate 2000 - [redacted]

Told not have anything to do
w/ political events

[redacted]
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- Doesn't know what [redacted] was for
Was for Star Lee - who [redacted]
[redacted]

Lee said [redacted] asked him to
[redacted]

- Norway - SLM paid \$366,000
 only [redacted] acct depart. ^{b6}
^{b7c}
 had no idea about this

[redacted] [redacted]
 Had a company [redacted]
 company [redacted]
 had [redacted]

Not accurate the FEC report.

Specifically told not to pay for
 tribute event. [redacted]

[redacted] to be careful [redacted]

talked w [redacted]

[redacted] stated
 Stan Lee & [redacted] were involved
 not the company. [redacted] made this
 statement [redacted] was not
 a SLM. [redacted] said paid to event

[redacted] was [redacted]
[redacted] SUM [redacted] was good.

[redacted] was invited to trilunte - he attended
unknown about francis trilunte

[redacted]

Saw at event - said hello

[redacted] he took out 109W.
Cynthia Gershman - Stan Lee said
[redacted] owed [redacted] by [redacted] - said
would be paid by Gershman. Never
was paid

[redacted] had dinner at [redacted]

Gershman was invited also [redacted]
may have told him

Universal Case File Number

PL-LA-227506-1A8

Field Office Acquiring Evidence

LA

Serial # of Originating Document

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10/19/01

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Federal Taxpayer Information (FTI)

☐ Yes ☐ No

Title:

New York Senate 2000

Campaign Finance Violation

OO: LA

Reference:

(Communication Enclosing Material)

Description:



Original notes re interview of

302-

10/19/01

11/10/01-RM

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b7C

(5/18)

1/7 b6
b7c

56C-LA-227506-1A8

- met [redacted] through [redacted]
[redacted] wanted [redacted] to meet
w/ [redacted] to [redacted]

- [redacted] wanted [redacted] to be a [redacted]
Set up office at SLM. After a month, did not
want to [redacted] wanted to do

[redacted]

[redacted] - thought it was a stock play
[redacted] was supposed to stock [redacted]

[redacted]

Claimed he spent a million on event
was going to [redacted]

[redacted] could not [redacted]

Told to [redacted]

[redacted] was going cash immediately

8/7
Stan Lee - was not involved / kind of

[redacted] - wanted to get [redacted]
[redacted]

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[redacted] of sum
[redacted] was hand working - legitimate
individual [redacted]
[redacted] the day to day
operations

[redacted] - not sure of his role
not sure also - met him, but
no dealings w/ them

[redacted] asked if she could [redacted] for
event. [redacted] was very involved / [redacted] was very involved
- Went to [redacted] [redacted] -
at [redacted]
[redacted] from
Hillary Clinton campaign [redacted]

[redacted]

met [redacted] w/ Pres Clinton

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b7c</sup>

- W.H. [redacted]

- Dinner in [redacted]

[redacted] paid for w/ Cynthia Bushman for June

2000

- Gala

- no conversation w/ Clinton

- Hillary at [redacted] paid for by [redacted]

[redacted]

- not a fundraiser

[redacted] (noted above)

- [redacted] called in and [redacted] for the

event - [redacted] at ab, [redacted]

[redacted]

- Received [redacted] for services in
event - come from [redacted] / or from
Star Lee in [redacted] 2000

- [redacted]

[redacted]

were very concerned
about everything correctly
and by the book

Universal Case File Number 366-LA-227506, 1A9Field Office Acquiring Evidence LA

Serial # of Originating Document _____

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Federal Rules of Criminal Procedure☐ Yes ☐ No

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☐ Yes ☐ NoTitle: New York Senate 2000[Redacted]Campaign Finance Violations
OO: LA

Reference: _____

(Communication Enclosing Material)

Description: ☒ Original notes re interview of302- [Redacted] 10/23/0111/10/01b6
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10/23/01

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CA

56C-LA-227506-1A9

- Tribute was only event [redacted] for Democrats
 - Tea for H.C. hosted by Cher (Sept 2002)
 - Tea @ Gerhard (June) (Same day as Spago luncheon)
 - Luncheon at Spago [redacted]
 - [redacted] June -

- Unsure if introduced [redacted] to [redacted]
[redacted] introduced everyone to [redacted]
[redacted]
DNC [redacted]
[redacted] DNC official [redacted] met with

[redacted] about expenses for event - was well aware of actual costs.

[redacted] d/ b6
[redacted] - discussed b7C
w/ [redacted] would [redacted]
[redacted]

- [redacted] is where [redacted] staged
first by [redacted]

- [redacted] - [redacted] last spoke w/ him

Cynthia Gershan - did not pay half
for Gala. Was doing other things w/ SLM
would buy stock to help out.

[redacted] were involved w/ [redacted]
[redacted] gave [redacted] money for SLM - if
he did, [redacted] was doing for SLM.

[redacted]
not aware of it -- never discuss [redacted]

Jel - had nothing to do w/ event - may
have Alzheimer's

American Spirit Foundation - nothing to pay
for event. It was ~~for~~ for other events
- [redacted] check -

- Denied [redacted] scenario
and claimed that Mrs. Gershman had
nothing to do with anything.

[redacted] Pay through

↳ [redacted]
↳ [redacted]
↳ [redacted]

[redacted]
[redacted]
[redacted]

Would get [redacted]

[redacted]

Left SCM around [redacted]

[redacted] said [redacted]

[redacted] because Strom lent
money [redacted]

Universal Case File Number SGC-LA-227506-1A10Field Office Acquiring Evidence LASerial # of Originating Document 10/31/01

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

Federal Rules of Criminal Procedure

☐ Yes ☐ No

Federal Taxpayer Information (FTI)

☐ Yes ☐ No

Title:

[redacted]
New York Senate 2000
Campaign Finance Law Violations
OO: LAReference: _____
(Communication Enclosing Material)Description: ☒ Original notes re interview of[redacted] 10/31/0111/10/01-ernb6
b7Cb6
b7Cb6
b7C

1/10

b6
b7C

56C-LA-227506-1A10

- Do [redacted]
- Background in [redacted]
- Specialize in [redacted]
- [redacted]

→ Hollywood Gala was retained by [redacted]
to [redacted] farewell to Pres Clinton
to benefit Mrs Clinton
- To find venture 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 was
mtg w [redacted] was
[redacted]

3/10

b6
b7C

[redacted] w/ SLM - not lots of
interaction [redacted] was primary contact for [redacted]
Seemed to be really involved. Went to

[redacted] along w/
[redacted] to discuss [redacted]

[redacted]

[redacted]

↳ Was very involved

- All aspects of events
- Was involved w/ NY Senate 2000 rep
- Brought in her ^(HC) supporters
- Acted on [redacted]

- ^{Stan} Lee (Putting on this event) - bring his
company profile up - speculated

- [redacted] knows name ~~left~~ [redacted]
[redacted] was involved [redacted]

Universal Case File Number 561-LA-227506-1415Field Office Acquiring Evidence LA

Serial # of Originating Document _____

Date Received 11/13/01From [Redacted]

(Name of Contributor)

[Redacted]

(Address of Contributor)

Los Angeles

(City and State)

By [Redacted]To Be Returned ☐ Yes ☐ NoReceipt Given ☐ No

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

Federal Rules of Criminal Procedure

☐ Yes ☐ No

Federal Taxpayer Information (FTI)

☐ Yes ☐ NoTitle: BS [Redacted]
New York Senate 2000
GOILAReference: _____
(Communication Enclosing Material)Description: Original notes re interview of[Redacted] - 11/13/0111/29/01-EMb6
b7Cb6
b7Cb6
b7C

005
11/13/01
1/

b6
b7C

Address:

City:

Phone:

DOB:

SSAN:

58C-LA-227506-1A15

Occupation:

- Gala worked as

was doing

- ^{Black Ink Prod.} Responsible for the concert production,
- Hired by [redacted] at request of [redacted]
contact btwn Black Ink [redacted]
- Worked w/ [redacted] on a number of occasion

[redacted] worked w/ [redacted]

b6
b7c

[redacted] was super-coordinator - [redacted]

[redacted] was involved w/ [redacted]

~~A~~ Never participated in meetings
about financial costs - [redacted] was
final cost for [redacted]

Never spent anything without [redacted]
approval.

Didn't know what [redacted] role.

[redacted] NO

[redacted] - NO

[redacted] NO

Stan Lee - Not at all.

Was aware of political - needed to hire Union
personnel.

- Gave an initial budget - was in contract
was then given money to put on event.

Bill approved by [redacted] sent to [redacted] and

She [redacted]

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;

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Universal Case File Number 56C-LA-227506-1A19Field Office Acquiring Evidence LA

Serial # of Originating Document _____

Date Received 2/27/02

From _____

(Name of Contributor)

(Address of Contributor)

Los Angeles CA

(City and State)

By _____

(Name of Special Agent)

To Be Returned ☐ Yes ☐ NoReceipt 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
60 LA

Reference: _____

(Communication Enclosing Material)

Description: ☒ Original notes re interview of_____ 2/27/02b6
b7Cb6
b7Cb6
b7C7/2
3/5/02

56C-LA-227506-1A19

2/27/02
1/00Db6
b7C

[REDACTED]

- Rvn company [REDACTED]
- [REDACTED]
- Look leave [REDACTED]
was intro to [REDACTED] through
friends around [REDACTED]
- Started @ ~~SLM~~ around [REDACTED]
[REDACTED] until [REDACTED]
- Was [REDACTED] @ SLM -
- [REDACTED] internet company
that [REDACTED]
- Reported to [REDACTED] was
the CEO.

8/17

Gershman - Philanthropist - met
her at a Gore event. Doesn't

Stan Lee - [] helped [] b6
b7C

[] believe Lee was
aware of [] activities. Lee was

lucid during meetings w []
- Don't know about Gala details.

- See question sheet on []

- [] had met Clinton previous

- [] was [] convention
discussed []

- []

- [] was DNC people
on event.

- [] meet her at SLH

Universal Case File Number 561-LA-227506 -1A 29Field Office Acquiring Evidence LA

Serial # of Originating Document _____

Date Received 4/7/02From
(Name of Contributor)

(Address of Contributor)

(City and State)

By
(Name of Special Agent)To Be Returned ☐ Yes ☐ NoReceipt Given ☐ Yes ☐ No

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

Federal Rules of Criminal Procedure

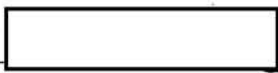
☐ Yes ☐ NoTitle:
New York Senate 2000
Campaign Finance Violations
OO: LAReference: _____
(Communication Enclosing Material)Description: ☒ Original notes re interview of 4/7/020-6-02
CS

- Set main invitations from New
list → got people to attend →

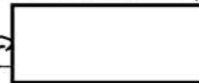
Went to a early meeting w



~~to~~ w/ ^{b6}
^{b7c}



Stan Lee media office →



~~Stan~~ Lee - not involved except to attend

1A-42

Universal Case File Number 56C-LA-227506Field 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 ☐ NoReceipt 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 Violations
OO: LAReference _____
(Communication Enclosing Material)Description: ☒ Original notes re interview ofCW meeting b6
b7C
b7D
b5b5
b7D

[Redacted]

ss.

[Redacted]

b6
b7C
b7D
b5

[Redacted]

[Redacted]

- the knowledge of purchasing activities

[Redacted]

[Redacted]

[Redacted]

- Bon + raised in

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Hollywood Gala @ Roberts estate

[Redacted]

b6
b7C
b7D
b5

Don't think HCLBC know what is going on.

Raised millions -> paid millions

[Redacted]

- Star See media was involved

[Redacted] associate

- Cynthia Gushwa - big \$ fundraiser ->
gives lots of \$ [Redacted]

- [Redacted] - brought [Redacted] in

- [Redacted] [Redacted]

- [Redacted] [Redacted]

- [Redacted] on [Redacted]

- 2 million in cost for Gala (total)

[Redacted]

b6
b7C
b7D
b5

[Redacted]

Hillary Clinton and [Redacted]

[Redacted] →

[Redacted]

Gala Participants

① Stan Lee - claims victim → raise profile of SLM. [Redacted]

[Redacted]

② Cynthia ^{Gershon} is money behind [Redacted]

very wealthy → [Redacted]

[Redacted] Gershon [Redacted]

③

Universal Case File Number 566-LA-277506 1A-76Field Office Acquiring Evidence LA

Serial # of Originating Document _____

Date Received 12/20/04From
(Name of Contributor)

(Address of Contributor)

(City and State)

By To Be Returned ☐ Yes ☐ NoReceipt Given ☐ Yes ☐ NoGrand Jury Material - Disseminate Only Pursuant to Rule 6 (e)
Federal Rules of Criminal Procedure☐ Yes ☐ No

Federal Taxpayer Information (FTI)

☐ Yes ☐ NoTitle:

*Please
place in
close 1A
file*

Reference: _____
(Communication Enclosing Material)Description: ☒ Original notes re interview of

*1/11/07
CH*

b6
b7C
b7D
b5b6
b7Cb6
b7C
b7D
b5

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 11/12/2002

To: Los Angeles

Attn: SAC

From: Los Angeles

WCC-6

Contact: SA [REDACTED]

Approved By: [REDACTED] *BAB*

Drafted By: [REDACTED] *DCS*

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

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

Synopsis: To request reimbursement of [REDACTED] 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

b6
b7C

b7E

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 [redacted] 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 [redacted] was [redacted]

b6
b7C

[redacted] is currently in [redacted] In addition, [redacted] is [redacted] In the early [redacted]

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 [redacted]

b6
b7C

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.

b6
b7C

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

b6
b7C

[redacted] In addition, [redacted] also [redacted]

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

b5
b6
b7C
b7D

[redacted] During these proffer [redacted]

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 09/10/2002

To: Los Angeles

Attn: SAC

From: Los Angeles

WCC-6

Contact: SA [REDACTED]

Approved By: [REDACTED] *M/SG*

Drafted By: [REDACTED] *dcS*

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

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

Synopsis: To request reimbursement of [REDACTED] 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, 09/10/2002

proceeds to the HILLARY CLINTON FOR UNITED STATES SENATE CAMPAIGN.

The GALA was hosted by comic book legend STAN LEE and [redacted] 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 [redacted]

b6
b7C

[redacted] is currently in [redacted] In addition, [redacted] is [redacted] In the early [redacted]

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 [redacted]

b6
b7C

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.

b6
b7C

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

b6
b7C

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

b5
b6
b7C
b7D

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;

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X No Duplication Fee X
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Attachment

[redacted] et al;
NEW YORK SENATE 2000;
CAMPAIGN FINANCE VIOLATIONS;
OO:LOS ANGELES
56C-LA-227506

b6
b7C

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 [redacted] 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 [redacted]

b6
b7C

[redacted] who is currently in [redacted]

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 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.

b6
b7C

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.

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

Total Deleted Page(s) = 2
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Page 3 ~ Duplicate;

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X No Duplication Fee X
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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1421921-0

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

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

Precedence: ROUTINE

Date: 03/05/2003

To: San Francisco

Attn: Public Corruption Squad

From: Los Angeles

WCC-4

Contact: SA [REDACTED]

Approved By: [REDACTED]

Drafted By: [REDACTED] dcs

Case ID #: 56C-LA-227506-GJ-77 (Pending)

Title: [REDACTED] et al;
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 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 [REDACTED] 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.

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b3
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b7C

b6
b7C

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 03/19/2003

To: Chicago

Attn: WC-3

SSA [REDACTED]

From: Los Angeles

WCC-4

Contact: SA [REDACTED]

Approved By: [REDACTED] *LPK*

Drafted By: [REDACTED] *DCS*

b6
b7C
b7E

Case ID #: 56C-LA-227506-GJ *81* (Pending)

Title: [REDACTED]

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 [REDACTED]

b3

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 [REDACTED] of an Internet media company called STAN LEE MEDIA (SLM). At the time of the event, SLM was

b6
b7C

file: 078cls 01.03

56-C-LA-227506-6J