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**U.S. Department of Justice** 

Federal Bureau of Investigation Washington, D.C. 20535

October 11, 2019

MR. JOHN GREENEWALD JR. SUITE 1203 27305 WEST LIVE OAK ROAD CASTAIC, CA 91384

> FOIPA Request No.: 1419042-000 Subject: BODMAN, SAMUEL

Dear Mr. Greenewald:

The enclosed documents were reviewed under the Freedom of Information Act (FOIA), Title 5, United States Code, Section 552. Below you will find check boxes under the appropriate statute headings which indicate the types of exemptions asserted to protect information which is exempt from disclosure. The appropriate exemptions are noted on the enclosed pages next to redacted information. In addition, a deleted page information sheet was inserted to indicate where pages were withheld entirely and identify which exemptions were applied. The checked exemption boxes used to withhold information are further explained in the enclosed Explanation of Exemptions.

Section 552	2	Section 552a
(b)(1)	(b)(7)(A)	🔲 (d)(5)
🔲 (b)(2)	(b)(7)(B)	🔲 (j)(2)
🔽 (b)(3)	✓ (b)(7)(C)	🔲 (k)(1)
50 U.S.C. 3024(i)(1)	✔ (b)(7)(D)	🗖 (k)(2)
	✓ (b)(7)(E)	🔲 (k)(3)
	(b)(7)(F)	🔲 (k)(4)
<b>(b)(4)</b>	(b)(8)	🔲 (k)(5)
<b>(b)(5)</b>	🗖 (b)(9)	🔲 (k)(6)
✓ (b)(6)		🔲 (k)(7)

506 pages were reviewed and 340 pages are being released.

Please see the paragraphs below for relevant information specific to your request as well as the enclosed FBI FOIPA Addendum for standard responses applicable to all requests.

- Documents were located which originated with, or contained information concerning, other Government Agencies [OGAs].
  - This information has been referred to the OGA(s) for review and direct response to you.
  - We are consulting with another agency. The FBI will correspond with you regarding this information when the consultation is completed.

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 on 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 <u>www.fbi.gov/foia</u> 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.

You may file an appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, Sixth Floor, 441 G Street, NW, Washington, D.C. 20001, or you may submit an appeal through OIP's FOIA online portal by creating an account on the following website: <u>https://www.foiaonline.gov/foiaonline/action/public/home</u>. Your appeal must be postmarked or electronically transmitted within ninety (90) days from the date of this letter in order to be considered timely. 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 <u>ogis@nara.gov</u>; 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 <u>foipaquestions@fbi.gov</u>. 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.

✓

See additional information which follows.

Sincerely,

David M. Hardy Section Chief Record/Information Dissemination Section Information Management Division

The enclosed documents represent the first interim release of information responsive to your Freedom of Information Act (FOIA) request.

Inquiries regarding your OGA direct referrals may be directed to the following agencies at:

Department of Commerce Attn: Roberta Parsons FOI/PA Officer, Room 61013 1401 Constitution Avenue, NW Washington D.C. 20230

Department of the Army Defense Manpower Data Center (DMDC) 1600 Spearhead Division Avenue Department 548 Fort Knox, KY 40122-5504

Information compiled for law enforcement purposes was withheld per FOIA exemption (b)(7)(E).

Duplicate copies of the same document were not processed.

This material is being provided to you at no charge.

Enclosures

## **FBI FOIPA Addendum**

As referenced in our letter responding to your Freedom of Information/Privacy Acts (FOIPA) request, the FBI FOIPA Addendum includes information 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 on individuals. Part 3 includes general information about FBI records. For questions regarding Parts 1, 2, or 3, visit the <u>www.fbi.gov/foia</u> website under "Contact Us." Previously mentioned appeal and dispute resolution services are also available at the web address.

### 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 FOIA [5 U.S.C. § 552(c) (2006 & Supp. IV (2010)]. FBI responses are limited to those records subject to the requirements of the FOIA. Additional information about the FBI and the FOIPA can be found on the www.fbi.gov/foia website.
- (ii) National Security/Intelligence Records. The FBI can neither confirm nor deny the existence of national security and foreign intelligence records pursuant to FOIA exemptions (b)(1), (b)(3), and PA exemption (j)(2) as applicable to requests for records about individuals [5 U.S.C. §§ 552/552a (b)(1), (b)(3), and (j)(2); 50 U.S.C § 3024(i)(1)]. 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 national security or foreign intelligence records do or do not exist.

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

- 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 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 those systems or locations where responsive records would reasonably be found. A reasonable 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 and maintained by the FBI in the course of fulfilling law enforcement, intelligence, and administrative functions. The CRS spans the entire FBI organization and encompasses the records of FBI Headquarters (FBIHQ), FBI Field Offices, and FBI Legal Attaché Offices (Legats) worldwide and includes Electronic Surveillance (ELSUR) records. 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 sheets. 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 Checks. Additionally, requests can be submitted electronically at www.edo.cjis.gov. For additional information, please contact CJIS directly at (304) 625-5590.
- (iv) The 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 investigations, 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.

FBI/DOJ

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
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FD-263 (Rev: 9-8-97)

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD				
CHICAGO	BUREAU	04/17/2001	04/12/2001-04/16/20	· · · · · · · · · · · · · · · · · · ·	-		
TITLE OF CASE		REPORT MADE BY		TYPED BY			
SAMUEL WRIGHT BODM	AN, III	SA CHARACTER OF C LEVEL II -		jls	b6 . b7C		

<u>REFERENCE:</u> Bureau EC dated 04/09/2001.

- P -

# ADMINISTRATIVE:

Where appropriate, Privacy Act (e)(3) data was furnished to persons interviewed, Express promises of confidentiality, both limited and unlimited, have been noted where granted.

All investigation in Chicago has been completed.

APPROVED		SPECIAL	AGENT ARGE	DO NOT WRITE IN SPACES BELOW							
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# UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of: Date:	SA 04/17/2001	Office: CHICAGO	b6 b7С
Case ID #:	161B-HQ-1337020		
Title:	SAMUEL WRIGHT BODMAN, III		

Character: LEVEL II - PAS

Synopsis: Employment at CABOT MICRO ELECTRONICS CORPORATION verified. Interviews of the Company's CEO and Vice President/General Counsel yielded positive comments. Chicago was unable to review candidate's personnel file, as the company does not maintain such records for its directors.

- P -

DETAILS:

The following investigation was conducted by Special Agent (SA) unless otherwise b6 b7c

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

# 161B-HQ-1337020

### **EMPLOYMENT:**

CABOT MICRO ELECTRONICS CORPORATION 870 Commons Drive Aurora, Illinois May 1999 - Present

On April 16. 2001. for CABOT MICRO ELECTRONICS CORPORATION (CMEC), 870 Commons Drive, Aurora, Illinois, telephone number (630) 375-3361 advised she has known the candidate for approximately ten months. stated she knows the candidate by way of professional association as candidate is a member of CMEC's Board of Directors. **b6** further advised candidate is a member of the Board of Directors, b7C but does not serve in a full-time capacity. Candidate's compensation for duties rendered include an initial grant of stock options and annual stock options thereafter, plus a fee for each meeting attended. additionally advised to the best of her knowledge her and Company CEC are the only individuals who would have personal knowledge of candidate. believes that the candidate is trustworthy and able to maintain sensitive and confidential material appropriately. advised that to her knowledge, the candidate has never abused alcohol or prescription drugs, nor has the candidate ever used, sold, possessed, purchased, received, transferred, shipped, trafficked in, produced or manufactured any illegal substance. does not believe the candidate is biased or prejudiced toward any individual or group based upon their race, b6 sex, age, religion or ethnic origin. is not aware of b7C any activity or conduct in the candidate's background which could be used to influence, pressure, coerce or compromise him in any way or anything which could have an adverse impact on his character, reputation, judgement, discretion, stability, trustworthiness or responsibility. advised that she highly recommends the candidate for a position of trust and confidence with the United States Government.

On April 16, 2001, **b**6 advised he has b7C known the candidate professionally for approximately 14 years. He has interacted with candidate during business hours, but has visited socially with candidate on only one occasion. The candidate's responsibilities as a board member are to help direct and plan the direction of CMEC as an advisor. The candidate is not employed full time. described the candidate as a person of unquestioned integrity, character and honesty.

b6 commented favorably on the candidate's character, associates, reputation, financial ability and loyalty b7C to the United States. believes that the candidate is

trustworthy and able to handle sensitive and confidential material appropriately. Advised that to the best of his b6 knowledge, the candidate has never abused alcohol or prescription b7C drugs, nor has the candidate ever used, sold, possessed, purchased, received, transferred, shipped, trafficked in, produced or manufactured any illegal substance.

d)

does not believe the candidate is biased or prejudiced toward any individual or group based upon their race, sex, age, religion or ethnic origin. \_\_\_\_\_\_ is not aware of any activity or conduct in the candidate's background which could be used to influence, pressure, coerce or compromise him in any way or anything which could have an adverse impact on his character, reputation, judgement, discretion, stability, trustworthiness or responsibility. \_\_\_\_\_\_advised that he highly recommends the candidate for a position of trust and confidence with the United States Government.

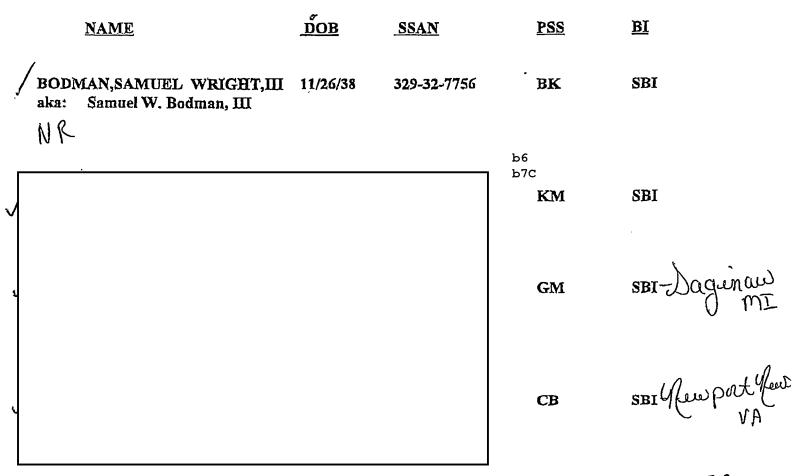
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# INVESTIGATION TO: BACKGROUND BRANCH (IBB) OPM

ATTN: FROM: Special Inquiry and General Background Investigations Unit (SIGBIU) FBI Headquarters

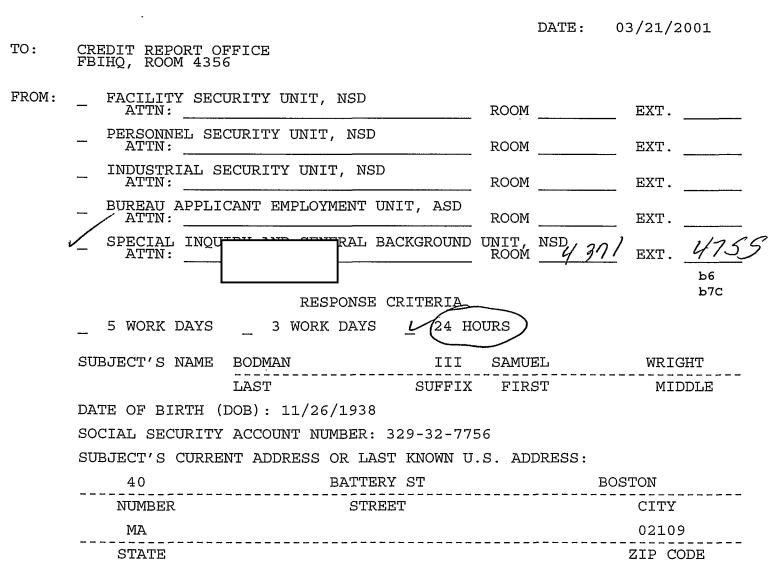
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FEDERAL BUREAU OF INVESTIGATION REQUEST FOR CREDIT CHECK



ENCLOSURE

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FBI/DOJ

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NBGL SK 5A*404CG1068 S/ CHARGE	R1 10/00 06/96		15733	0	02/00 52
BROOKS *404CG1100 I/	R1 06/99 01/88		12552	0	05/99 21 (01-00-00) 2********/********
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ITT/BOWEST*181FM195 I1 0 J/8696100692 0 ACCOUNT TRANSFERRED OR REAL ESTATE MORTGAGE	5/78	62500 522	0	09/95	33
GMAC *906FA34 I1 0 I/010-3160-39100 0 PAID ACCOUNT/ZERO BALAN LEASE		12765 531	0	02/95	22
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* MEMBER # COMP. NAME 906DC656 NEIMAN 1201 ELM ST ATTN: L 2700 RENAISSANCE TOWE	800-8258255 JACKSON	* MEMBER # COMP. NAM 450DC81 MCYE/FDSB 9111 DUKE BLVD	E TELEPHONE 513-5732150		
DALLAS	TX 75270	MASON	OH 45040		
8010N630 MBNA AMER 400 CHRISTIANIA ROAD	MAIL ONLY	404CG1068 NBGL SK 5 12 E 49TH STREET	A 800-3227257		
NEWARK	DE 19713-4217		NY 10017		
404CG1100 BROOKS P.O. BOX 29116 CG54	800-3444355	404DC21 BLMD/FDSE 9111 DUKE BLVD	513-5732163		
SHAWNEE MISSION	KS 66201	MASON	OH 45040		
146FM17 GMAC MTG 3451 HAMMOND AVE	319-2365400	178BB22381 FIRST ESS 296 ESSEX STREET	E 978-6817500		
WATERLOO	IA 50702-5345	LAWRENCE	MA 01840-1516		
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728DC31 BURD/FDSB 13141 34TH ST NORTH	513-5732323				
CLEARWATER	FL 34622				

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END OF REPORT EQUIFAX AND AFFILIATES - 03/21/01

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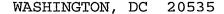
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DATE:03-21-2001 TIME:14:35:55 SUBJEC	T ID:Look
<pre>I BODMAN,SAMUEL,WRIGHT,03,*   40,,BATTERY,ST,BOSTON,MA,02109,* 5 329327756,3811,/8,,,* *TYPLK,EU-DEPTOFJUST,TYPCT</pre>	
TRANS UNION PEER REPORT FOR:	
US DEPT OF JUSTICE	DATE REPORT PRINTED: 03/21/2001
Z BT0004252 BUREAU: 14 BT	CENTRAL STANDARD TIME: 13:37
	IN OUR FILES SINCE: 02/1985
SUBJECT NAME: BODMAN, S W.	
	SOCIAL SECURITY NUMBER: 329-32-7756 PHONE: 367-3940
CURRENT ADDRESS REPORTED 08/1996: 40 BATTERY ST., #612. BOSTON MA. 02109	
FORMER ADDRESSES REPORTED 75 STATE ST., BOSTON MA. 02109 24 CHESTNUT ST., BOSTON MA. 02108	
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	ATION
CREDIT INFORM	
CREDIT INFORM THE FOLLOWING CREDIT SUMMARY REPRESENTS T PUBLIC RECORDS: 0 CURRENT NEGATIVE COLLECTIONS: 0 PREVIOUS NEGATIVE TRADE ACCTS: 12 PREVIOUS TIMES NE	IHE SUBJECT'S TOTAL FILE HISTORYACCTS:0REVOLVING ACCTS:7E ACCTS:0INSTALLMENT ACCTS:0EGATIVE:0MORTGAGE ACCTS:5
CREDIT INFORM THE FOLLOWING CREDIT SUMMARY REPRESENTS T PUBLIC RECORDS: 0 CURRENT NEGATIVE COLLECTIONS: 0 PREVIOUS NEGATIVE TRADE ACCTS: 12 PREVIOUS TIMES NE CREDIT INQUIRIES: 0 EMPLOYMENT INQUIR	THE SUBJECT'S TOTAL FILE HISTORYACCTS:0REVOLVING ACCTS:7E ACCTS:0INSTALLMENT ACCTS:0EGATIVE:0MORTGAGE ACCTS:5RIES:1OPEN ACCTS:0
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CREDIT INFORM THE FOLLOWING CREDIT SUMMARY REPRESENTS T PUBLIC RECORDS: 0 CURRENT NEGATIVE COLLECTIONS: 0 PREVIOUS NEGATIVE TRADE ACCTS: 12 PREVIOUS TIMES NE CREDIT INQUIRIES: 0 EMPLOYMENT INQUIN HIGH CRED CRED LIMIT BAN REVOLVING: \$47.6K \$47.7K \$17 MORTGAGE: \$125K \$ \$52 TOTALS: \$172K \$47.7K \$52 THE FOLLOWING ACCOUNT INFORMATION IS PRINT OF PAYMENT (MOP) AND DATE MOST RECENTLY UN GMAC MORT. F 2672002 VERIF'D 03/2001 BALANCE: \$1102 OPENED 05/1978 MOST OWED: \$6250	THE SUBJECT'S TOTAL FILE HISTORY         ACCTS:       0       REVOLVING ACCTS:       7         E ACCTS:       0       INSTALLMENT ACCTS:       0         EGATIVE:       0       MORTGAGE ACCTS:       5         RIES:       1       OPEN ACCTS:       0         LANCE       PAST DUE       MNTHLY       AVAIL         79       \$0       \$15       100%         2.1k       \$0       \$984         2.3k       \$0       \$999         FED IN ORDER BY MOST NEGATIVE MANNER         PDATED.         MORTGAGE ACCOUNT         CONVENTIONAL REAL ESTATE MTG         26       JOINT ACCOUNT         00       PAY TERMS:       300 MONTHLY \$492
CREDIT INFORM THE FOLLOWING CREDIT SUMMARY REPRESENTS T PUBLIC RECORDS: 0 CURRENT NEGATIVE COLLECTIONS: 0 PREVIOUS NEGATIVE TRADE ACCTS: 12 PREVIOUS TIMES NE CREDIT INQUIRIES: 0 EMPLOYMENT INQUIR HIGH CRED CRED LIMIT BAN REVOLVING: \$47.6K \$47.7K \$12 MORTGAGE: \$125K \$ \$52 TOTALS: \$172K \$47.7K \$52 THE FOLLOWING ACCOUNT INFORMATION IS PRINT OF PAYMENT (MOP) AND DATE MOST RECENTLY UN GMAC MORT. F 2672002 VERIF'D 03/2001 BALANCE: \$1100 OPENED 05/1978 MOST OWED: \$6250 STATUS AS OF 03/2001: PAID OR PAYING AS IN PRIOR 41 MONTHS FROM DATE VERIF'D NO	THE SUBJECT'S TOTAL FILE HISTORY         ACCTS:       0       REVOLVING ACCTS:       7         E ACCTS:       0       INSTALLMENT ACCTS:       0         EGATIVE:       0       MORTGAGE ACCTS:       5         RIES:       1       OPEN ACCTS:       0         LANCE       PAST DUE       MNTHLY       AVAIL         79       \$0       \$15       100%         2.1K       \$0       \$984         2.3K       \$0       \$999         FED IN ORDER BY MOST NEGATIVE MANNER         PDATED.       MORTGAGE ACCOUNT         CONVENTIONAL REAL ESTATE MTG         26       JOINT ACCOUNT         00       PAY TERMS: 300 MONTHLY \$492         FANNIE MAE       # 1659401250         S AGREED       EVER LATE
CREDIT INFORM THE FOLLOWING CREDIT SUMMARY REPRESENTS T PUBLIC RECORDS: 0 CURRENT NEGATIVE COLLECTIONS: 0 PREVIOUS NEGATIVE TRADE ACCTS: 12 PREVIOUS TIMES NE CREDIT INQUIRIES: 0 EMPLOYMENT INQUIR HIGH CRED CRED LIMIT BAN REVOLVING: \$47.6K \$47.7K \$12 MORTGAGE: \$125K \$ \$52 TOTALS: \$172K \$47.7K \$52 THE FOLLOWING ACCOUNT INFORMATION IS PRINT OF PAYMENT (MOP) AND DATE MOST RECENTLY UN GMAC MORT. F 2672002 VERIF'D 03/2001 BALANCE: \$1100 OPENED 05/1978 MOST OWED: \$6250 STATUS AS OF 03/2001: PAID OR PAYING AS IN PRIOR 41 MONTHS FROM DATE VERIF'D NO	THE SUBJECT'S TOTAL FILE HISTORY         ACCTS:       0       REVOLVING ACCTS:       7         E ACCTS:       0       INSTALLMENT ACCTS:       0         EGATIVE:       0       MORTGAGE ACCTS:       5         RIES:       1       OPEN ACCTS:       0         LANCE       PAST DUE       MNTHLY       AVAIL         79       \$0       \$15       100%         2.1K       \$0       \$984         2.3K       \$0       \$999         FED IN ORDER BY MOST NEGATIVE MANNER         PDATED.         MORTGAGE ACCOUNT         CONVENTIONAL REAL ESTATE MTG         26       JOINT ACCOUNT         00       PAY TERMS:       300 MONTHLY \$492         FANNIE MAE       # 1659401250         S AGREED       ************************************

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NÉIMAN MARCU	D 2816001	REVOLVING ACCOUNT CHARGE ACCOUNT					
VERIF'D 03/2001 OPENED 06/1996 PAID OFF 03/1999	BALANCE: \$0 MOST OWED: \$6567	REDIT LIMIT: \$10000					
STATUS AS OF 03/19	99: PAID OR PAYING AS AGR FROM DATE PAID NEVER LAT						
CONTACT SUBSCRIBER:	NEIMAN-MARCUS 1201 ELM ST, 2800 RENAIS	PH#: (800) 753-0407 SSANCE DALLAS, TX 75270					
MACYE/FDSB	D 1958001	REVOLVING ACCOUNT CHARGE ACCOUNT					
VERIF'D 02/2001 OPENED 02/1995 PAID OFF 03/1995	BALANCE: \$0 MOST OWED: \$293	INDIVIDUAL ACCOUNT CREDIT LIMIT: \$700					
	95: PAID OR PAYING AS AGE FROM DATE PAID NEVER LAT						
CONTACT SUBSCRIBER:	MACY'S JM 9111 DUKE BLVD	PH#: MASON, OH 45040					
MBNA AMERICA		REVOLVING ACCOUNT CREDIT CARD					
VERIF'D 02/2001 OPENED 07/1996	BALANCE: \$179 MOST OWED: \$11890	AUTHORIZED ACCOUNT PAY TERMS: MINIMUM \$15 CREDIT LIMIT: \$20000					
	01: PAID OR PAYING AS AGE FROM DATE VERIF'D NEVER	REED					
CONTACT SUBSCRIBER:	MBNA AMERICA POB 15026	PH#: (800) 410-6262 WILMINGTON, DE 19801					
SAKS	C 2163009	REVOLVING ACCOUNT CHARGE ACCOUNT					
VERIF'D 10/2000 OPENED 06/1996 PAID OFF 01/1999	BALANCE: \$0 MOST OWED: \$15733	PARTICIPANT ON ACCOUNT CREDIT LIMIT: \$10000					
STATUS AS OF 01/19	99: PAID OR PAYING AS AGE FROM DATE PAID NEVER LAT						
CONTACT SUBSCRIBER:	SAKS FIFTH AVENUE PO BOX 10327	PH#: JACKSON, MS 39289					
BROOK/MCCBG	Q 235055Q	REVOLVING ACCOUNT CHARGE ACCOUNT					
PAID OFF 06/1999		CHARGE ACCOUNT INDIVIDUAL ACCOUNT CREDIT LIMIT: \$5000					
	99: PAID OR PAYING AS AGE FROM DATE PAID 1 TIME 3						
CONTACT SUBSCRIBER:	BROOKS BROS/MCCBG P O BOX 103014, DEPT 84	PH#: ROSWELL, GA 30076					
FST ESSEX BK		MORTGAGE ACCOUNT REAL ESTATE					
VERIF'D 04/1996 OPENED 05/1988 CLOSED 04/1996	BALANCE: \$0 MOST OWED: \$155400	INDIVIDUAL ACCOUNT PAY TERMS: 360 MONTHLY \$1561					

STATUS AS OF 04/1996: PAID OR PAYING AS AGREED IN PRIOR 23 MONTHS FROM DATE CLOSED NEVER LATE CONTACT SUBSCRIBER: FST ESSEX SAVINGS BANK 296 ESSEX ST PH#: (508) 681-7500 LAWRENCE, MA 01840 LTT RES CAPTQ 459R004MORTGAGE ACCOUNTTRANSFERREAL ESTATEVERIF'D 09/1995BALANCE:\$0JOINT ACCOUNTOPENED 05/1978MOST OWED:\$62500DATE 000/10005 ITT RES CAPT TRANSFER PAID OFF 09/1995 STATUS AS OF 09/1995: PAID OR PAYING AS AGREED IN PRIOR 05 MONTHS FROM DATE PAID NEVER LATE CONTACT SUBSCRIBER: ITT RESIDENTIAL CAPITALPH#: (800) 854-70119275 SKY PARK CT, PO BOX 85101SAN DIEGO, CA 92186 Q 459R003 BOWEST CORP MORTGAGE ACCOUNT CRNSFRD: OTHER LENDERREAL ESTATEVERIF'D 07/1994BALANCE:\$0PARTICIPANT ON ACCOUNTOPENED 06/1978MOST OWED:\$62500PAY TERMS: 300 MONTHLY \$492CLOSED 07/199407/1994 TRNSFRD: OTHER LENDER OPENED 06/1978 CLOSED 07/1994 STATUS AS OF 07/1994: PAID OR PAYING AS AGREED IN PRIOR 02 MONTHS FROM DATE CLOSED NEVER LATE BOWEST CORP 9275 SKYPARK COURT SAN DIEGO, CA 92123 CONTACT SUBSCRIBER: BOWEST CORP BURDIN/FDSBD 635D001REVOLVING ACCOUNTVERIF'D 03/1994BALANCE:\$0JOINT ACCOUNTOPENED 11/1981MOST OWED:\$570CREDIT LIMIT: **\$**0 PAID OFF 06/1993 STATUS AS OF 06/1993: PAID OR PAYING AS AGREED CONTACT SUBSCRIBER: BURDINES PH#: 13141 34TH ST N CLEARWATER, FL 33755 BLOOMD/FDSBD 989D002REVOLVING ACCOUNTVERIF'D 09/1993BALANCE:\$0INDIVIDUAL ACCOUNTOPENED 01/1973MOST OWED:\$0CREDIT LIMIT:\$2000 STATUS AS OF 09/1993: PAID OR PAYING AS AGREED CONTACT SUBSCRIBER: BLOOMINGDALES PH#: MASON, OH 45040 9111 DUKE BLVD B 438S006 MORTGAGE ACCOUNT BEAL ESTATE WORKINGMENS STATUS AS OF 12/1992: UNRATED CONTACT SUBSCRIBER: WORKINGMENS CO-OPERATIVEPH#:C/O FDIC, ONE RESEARCH DRWESTBOROUGH, MA 01581 \_\_\_\_\_ THE FOLLOWING COMPANIES HAVE REQUESTED THE SUBJECT'S FILE FOR EMPLOYMENT USE: DATE SUBCODE SUBSCRIBER NAME 03/21/2001 Z 4252 US DEPT OF JUSTICE 935 PENNSYLVANIA A, ROOM



END OF PEER REPORT - SERVICED BY:

TRANS UNION 2 BALDWIN PLACE, P. O. BOX 1000 CHESTER, PA. 19022 800-888-4213

> COPYRIGHTED TRANS UNION 1994 A SUMMARY OF YOUR RIGHTS UNDER THE FAIR CREDIT REPORTING ACT

THE FEDERAL FAIR CREDIT REPORTING ACT (FCRA) IS DESIGNED TO PROMOTE ACCURACY, FAIRNESS, AND PRIVACY OF INFORMATION IN THE FILES OF EVERY "CONSUMER REPORTING AGENCY" (CRA). MOST CRA'S ARE CREDIT BUREAUS THAT GATHER AND SELL INFORMATION ABOUT YOU -- SUCH AS IF YOU PAY YOUR BILLS ON TIME OR HAVE FILED BANKRUPTCY --TO CREDITORS, EMPLOYERS, LANDLORDS, AND OTHER BUSINESSES. YOU CAN FIND THE COMPLETE TEXT OF THE FCRA, 15 U.S.C \$\$1681-1681U, AT THE FEDERAL TRADE COMMISSION'S WEB SITE (HTTP://WWW.FTC.GOV). THE FCRA GIVES YOU SPECIFIC RIGHTS, AS OUTLINED BELOW. YOU MAY HAVE ADDITIONAL RIGHTS UNDER STATE LAW. YOU MAY CONTACT A STATE OR LOCAL CONSUMER PROTECTION AGENCY OR A STATE ATTORNEY GENERAL TO LEARN THOSE RIGHTS.

- YOU MUST BE TOLD IF INFORMATION IN YOUR FILE HAS BEEN USED AGAINST YOU. ANYONE WHO USES INFORMATION FROM A CRA TO TAKE ACTION AGAINST YOU -- SUCH AS DENYING AN APPLICATION FOR CREDIT, INSURANCE, OR EMPLOYMENT -- MUST TELL YOU, AND GIVE YOU THE NAME, ADDRESS, AND PHONE NUMBER OF THE CRA THAT PROVIDED THE CONSUMER REPORT.
- YOU CAN FIND OUT WHAT IS IN YOUR FILE. AT YOUR REQUEST, A CRA MUST GIVE YOU THE INFORMATION IN YOUR FILE, AND A LIST OF EVERYONE WHO HAS REQUESTED IT RECENTLY. THERE IS NO CHARGE FOR THE REPORT IF A PERSON HAS TAKEN ACTION AGAINST YOU BECAUSE OF INFORMATION SUPPLIED BY THE CRA. IF YOU REQUEST THE REPORT WITHIN 60 DAYS OF RECEIVING NOTICE OF THE ACTION. YOU ALSO ARE ENTITLED TO ONE FREE REPORT EVERY TWELVE MONTHS UPON REQUEST IF YOU CERTIFY THAT (1) YOU ARE UNEMPLOYED AND PLAN TO SEEK EMPLOYMENT WITHIN 60 DAYS, (2) YOU ARE ON WELFARE, OR (3) YOUR REPORT IS INACCURATE DUE TO FRAUD. OTHERWISE, A CRA MAY CHARGE YOU UP TO EIGHT DOLLARS AND FIFTY CENTS.
- YOU CAN DISPUTE INACCURATE INFORMATION WITH THE CRA. IF YOU TELL A CRA THAT YOUR FILE CONTAINS INACCURATE INFORMATION, THE CRA MUST INVESTIGATE THE ITEMS (USUALLY WITHIN 30 DAYS) BY PRESENTING TO ITS INFORMATION SOURCE ALL RELEVANT EVIDENCE YOU SUBMIT, UNLESS YOUR DISPUTE IS FRIVOLOUS. THE SOURCE MUST REVIEW YOUR EVIDENCE AND REPORT ITS FINDINGS TO THE CRA. (THE SOURCE ALSO MUST ADVISE NATIONAL CRA'S -- TO WHICH IT HAS PROVIDED THE DATA -- OF ANY ERROR.) THE CRA MUST GIVE YOU A WRITTEN REPORT OF THE INVESTIGATION, AND A COPY OF YOUR REPORT IF THE INVESTIGATION RESULTS IN ANY CHANGE. IF THE CRA'S INVESTIGATION DOES NOT RESOLVE THE DISPUTE, YOU MAY ADD A BRIEF STATEMENT IN FUTURE REPORTS. IF AN ITEM IS DELETED OR A DISPUTE STATEMENT IS FILED, YOU MAY ASK THAT ANYONE WHO HAS RECENTLY RECEIVED YOUR REPORT BE NOTIFIED OF THE CHANGE.
- INACCURATE INFORMATION MUST BE CORRECTED OR DELETED. A CRA MUST REMOVE OR CORRECT INACCURATE OR UNVERIFIED INFORMATION FROM ITS FILES, USUALLY WITHIN 30 DAYS AFTER YOU DISPUTE IT. HOWEVER, THE CRA IS NOT REQUIRED TO REMOVE ACCURATE DATA FROM YOUR FILE UNLESS IT IS OUTDATED (AS DESCRIBED BELOW) OR CANNOT BE VERIFIED. IF YOUR DISPUTE RESULTS IN ANY CHANGE TO YOUR REPORT, THE CRA CANNOT REINSERT INTO YOUR FILE A DISPUTED ITEM UNLESS THE INFORMATION

SOURCE VERIFIES ITS ACCURACY AND COMPLETENESS. IN ADDITION, THE CRA MUST GIVE YOU A WRITTEN NOTICE TELLING YOU IT HAS REINSERTED THE ITEM. THE NOTICE MUST INCLUDE THE NAME, ADDRESS AND PHONE NUMBER OF THE INFORMATION SOURCE.

- YOU CAN DISPUTE INACCURATE ITEMS WITH THE SOURCE OF THE INFORMATION. IF YOU TELL ANYONE -- SUCH AS A CREDITOR WHO REPORTS TO A CRA -- THAT YOU DISPUTE AN ITEM THEY MAY NOT THEN REPORT THE INFORMATION TO A CRA WITHOUT INCLUDING A NOTICE OF YOUR DISPUTE. IN ADDITION, ONCE YOU'VE NOTIFIED THE SOURCE OF THE ERROR IN WRITING, IT MAY NOT CONTINUE TO REPORT THE INFORMATION IF IT IS, IN FACT, AN ERROR.
- OUTDATED INFORMATION MAY NOT BE REPORTED. IN MOST CASES, A CRA MAY NOT REPORT NEGATIVE INFORMATION THAT IS MORE THAN SEVEN YEARS OLD; TEN YEARS FOR BANKRUPTCIES.
- ACCESS TO YOUR FILE IS LIMITED. A CRA MAY PROVIDE INFORMATION ABOUT YOU ONLY TO PEOPLE WITH A NEED RECOGNIZED BY THE FCRA -- USUALLY TO CONSIDER AN APPLICATION WITH A CREDITOR, INSURER, EMPLOYER, LANDLORD, OR OTHER BUSINESS.
- YOUR CONSENT IS REQUIRED FOR REPORTS THAT ARE PROVIDED TO EMPLOYERS, OR REPORTS THAT CONTAIN MEDICAL INFORMATION. A CRA MAY NOT GIVE OUT INFORMATION ABOUT YOU TO YOUR EMPLOYER, OR PROSPECTIVE EMPLOYER, WITHOUT YOUR WRITTEN CONSENT. A CRA MAY NOT REPORT MEDICAL INFORMATION ABOUT YOU TO CREDITORS, INSURERS, OR EMPLOYERS WITHOUT YOUR PERMISSION.
- YOU MAY CHOOSE TO EXCLUDE YOUR NAME FROM CRA LISTS FOR UNSOLICITED CREDIT AND INSURANCE OFFERS. CREDITORS AND INSURERS MAY USE FILE INFORMATION AS THE BASIS FOR SENDING YOU UNSOLICITED OFFERS OF CREDIT OR INSURANCE. SUCH OFFERS MUST INCLUDE A TOLL-FREE PHONE NUMBER FOR YOU TO CALL IF YOU WANT YOUR NAME AND ADDRESS REMOVED FROM FURTURE LISTS. IF YOU CALL, YOU MUST BE KEPT OFF THE LISTS FOR TWO YEARS. IF YOU REQUEST, COMPLETE, AND RETURN THE CRA FORM PROVIDED FOR THIS PURPOSE, YOU MUST BE TAKEN OFF THE LISTS INDEFINITELY.
- YOU MAY SEEK DAMAGES FROM VIOLATORS. IF A CRA, A USER OR (IN SOME CASES) A PROVIDER OF CRA DATA, VIOLATES THE FCRA, YOU MAY SUE THEM IN STATE OR FEDERAL COURT.

THE FCRA GIVES SEVERAL DIFFERENT FEDERAL AGENCIES AUTHORITY TO ENFORCE THE FCRA:

FOR QUESTIONS OR CONCERNS REGARDING: PLEASE CONTACT:

CRA'S CREDITORS AND OTHERS NOT FEDERAL TRADE COMMISSION LISTED BELOW

. .

CONSUMER RESPONSE CENTER - FCRA WASHINGTON, DC 20580 202-326-3761

AGENCIES OF FOREIGN BANKS (WORD "NATIONAL" OR INITIALS "N.A." APPEAR IN OR AFTER BANK'S NAME)

FEDERAL RESERVE SYSTEM MEMBER BANKS BRANCHES / AGENCIES OF FOREIGN BANKS)

SAVINGS ASSOCIATIONS AND FEDERALLY OFFICE OF THRIFT SUPE CHARTERED SAVINGS BANKS (WORD CONSUMER PROGRAMS "FEDERAL" OR INITIALS "F.S.B." WASHINGTON, DC 20552

NATIONAL BANKS, FEDERAL BRANCHES / OFFICE OF THE COMPTROLLER OF THE CURRENCY AGENCIES OF FOREIGN BANKS (WORD COMPLIANCE MANAGEMENT MAIL STOP 6-6 COMPLIANCE MANAGEMENT, MAIL STOP 6-6 WASHINGTON, DC 20219 800-613-6743

FEDERAL RESERVE BOARD (EXCEPT NATIONAL BANKS, AND FEDERAL DIVISION OF COMSUMER & COMMUNITY AFFAIRS WASHINGTON, DC 20551 202-452-3693

OFFICE OF THRIFT SUPERVISION

APPEAR IN FEDERAL INSTITUTION'S

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FEDERAL CREDIT UNIONS (WORDS "FEDERAL CREDIT UNION" APPEAR IN INSTITUTION'S NAME)

STATE-CHARTERED BANKS THAT ARE NOT MEMBERS OF THE FEDERAL RESERVE SYSTEM

AIR, SURFACE, OR RAIL COMMON CARRIERS REGULATED BY FORMER CIVIL AERONAUTICS BOARD OR INTERSTATE

ACTIVITIES SUBJECT TO THE PACKERS AND STOCKYARDS ACT, 1921

800-842-6929

NATIONAL CREDIT UNION ADMINISTRATION 1775 DUKE STREET ALEXANDRIA, VA 22314 703-518-6360

FEDERAL DEPOSIT INSURANCE CORPORATION DIVISION OF COMPLIANCE & CONSUMER AFFAIRS WASHINGTON, DC 20429 800-934-FDIC

DEPARTMENT OF TRANSPORTATION OFFICE OF FINANCIAL MANAGEMENT WASHINGTON, DC 20590 202-366-1306

DEPARTMENT OF AGRICULTURE OFFICE OF DEPUTY ADMINISTRATOR - GIPSA WASHINGTON, DC 20250 202-720-7051

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\*\*\* END OF REPORT ID: 03-21-2001/14:35:55 (ORN: 1529) [B-0/F-0/P-0/O-0] \*\*\*

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PI	EASE RETURN TO PSS		b6 b7C
SUBJECT:	BODMAN, SAMUEL, WRIGHT	. A	Til Mile.
DOB:	1938/11/26	request	DIS file
SSAN:	329-32-7756	/	
OTHER-NAM	1ES:		

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CHECK CONDUCTED BY: <u>IN</u> ON: <u>3-21-0</u>

P.01/03 202 324 4195 BIU MÁR-21-2001 15:49 Ì. AT. FBI FACSIMILE COVERSHEET Dates 3. 31.01 b6 b7C To: Facsimile Number: (410) 865-2289 From: FBIHQ/SPECIAL INQUIRY AND GENERAL BACKGROUND INVESTIGATIONS UNIT (SIGBIU) HOPE YOU CAN Subject: Requests for microfilm HANDLE copies of DIS files THE (See attached DCII check) SIZE OF THIS ORDER! Special Handling: Please hand carry ' b6 upon receipt to Team b7C Supervisor b6 Originator's Name: \_ b7C Phone Number: UR 1865 Originator's Facsimile Number: 324-2574 Approved: and the second And the state of the ž

MAR-21-2001 1	5:49 GBIU	202 324 4195 P.02/03
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OTHER-NAM	ÆS:	

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CHECK CONDUCTED BY: M. ON: 3-21-0/

(01/26/1998)

# FEDERAL BUREAU OF INVESTIGATION

Precedence: DEADLIN	E 04/17/2001	Date: 03/21/2001
To: Boston Chicago Detroit Miami New York San Antonio Springfield Washington Fiel	d Attn:	Squad A-1 Squad A-2 Scanned 3-22.01
Unit (SIGBIU), Room	quiry and General B	ackground Investigations
Approved By		ь6 b7С
Drafted By:		
Case ID #: 161B-HQ-	1337020 (Pending)	
Title: SAMUEL WRIGH LEVEL II-PAS	F BODMAN, III	
Synopsis: Initiatio	n of full-field bac	kground investigation

(FFI) on captioned candidate.

Administrative: BUDED is 04/17/2001.

RECEIVING OFFICES ARE TO ENSURE THAT A COPY OF THIS EC IS PROVIDED TO EACH INDIVIDUAL CONDUCTING INVESTIGATION IN CAPTIONED MATTER. ADDITIONALLY, WHEN SENDING FOLLOW-UP LEADS TO OTHER FIELD OFFICES NOT KNOWN TO BE INVOLVED IN CAPTIONED MATTER, ENSURE THAT A COPY OF THIS EC IS PROVIDED TO THOSE FIELD OFFICES AND THAT THIS EC SERIAL IS REFERENCED.

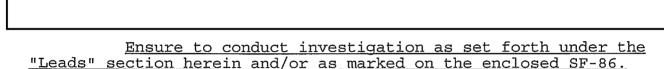
Field offices should also refer to the investigative guidelines set forth in MIOG, Part I, Section 161, and Part II, Section 17, for additional assistance in conducting investigation in captioned matter.

161B-HQ-1337020-2

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Field offices are reminded that neither the investigative status of a background investigation nor any deadlines are to be disclosed to the candidate or any interviewees. Candidates making inquiries of the status of their investigation are to be referred to the client entity

Direct results/questions to PSS Advise SIGBIU (PSS) and appropriate field offices of any derogatory information in accordance with MIOG, Part II, Section 17-5.1(1). If Buded will not be met, telephonically advise PSS and set forth reason(s) in <u>Administrative Section</u> of investigative report. SIGBIU facsimile numbers are (202) 324-2574 and (202) 324-6617.

**Enclosures:** Being forwarded to each field office, (either scanned or) with a hard copy of this EC via Bureau mail, is one copy each of the following: candidate's SF-86 dated 03/15/2001, Authorization for Release of Information dated 03/15/2001, and Authorization for Release of Medical Information dated 03/15/2001.

**Details:** Bureau has been requested by the WH to conduct a Level II FFI of candidate.

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b6 b7С

To: Boston From: Administrative Services Re: 161B-HQ-1337020, 03/21/2001

LEAD (s):

Set Lead 1:

BOSTON

AT BOSTON, MA

Review EC and enclosures, and conduct appropriate investigation.

Conduct candidate interview per guidelines. During interview, discuss candidate's foreign activities and response to Question 1S on the Supplement to SF-86. Also, discuss Question #21 of the SF-86. (REFER TO COUNSELING/COUNSELOR INTERVIEW POLICY SET FORTH IN ATTACHED GUIDELINES.)

During candidate interview, please see attached SF-86 and Supplement to SF-86, for issues to be discuss during candidate interview.

Verify residence and conduct appropriate interviews.

Verify employments and conduct appropriate interviews. Review OPF.

Verify education, review financial aid office records and check disciplinary records.

Verify divorce through court records.

Interview ex-spouse as a close personal associate.

Interview any <u>2</u> listed reference and independently developed <u>2</u> references and interview. Ensure at least <u>25</u> individuals knowledgeable concerning the candidate are interviewed.

Interview a sampling of at least one or two persons on the board. See Question 1S of Supplement to SF-86 regarding candidate.

Conduct USA, DMV, and law enforcement agency checks where appropriate.

Conduct indices on candidate, candidate's spouse and listed relatives.

4

To: Boston From: Administrative Services Re: 161B-HQ-1337020, 03/21/2001

Set Lead 2:

### <u>CHICAGO</u>

# AT CHICAGO, IL

Review EC and enclosures, and conduct appropriate investigation. candidate interview.

Conduct indices on candidate and listed relative.

Set Lead 3:

DETROIT

### AT DETROIT, MI

Review EC and enclosures, and conduct appropriate investigation.

Conduct indices on candidate and listed relative.

Set Lead 4:

<u>MIAMI</u>

AT MIAMI, FL

Review EC and enclosures, and conduct appropriate investigation.

Conduct USA and arrest check on candidate.

Set Lead 5:

NEW YORK

## AT NEW YORK, NY

Review EC and enclosures, and conduct appropriate investigation.

Conduct indices on candidate and listed relative.

5

To: Boston From: Administrative Services Re: 161B-HQ-1337020, 03/21/2001

Set Lead 6:

# SAN ANTONIO

# AT SAN ANTONIO, TX

Review EC and enclosures, and conduct appropriate investigation.

Conduct indices on candidate and listed relative.

Set Lead 7:

### SPRINGFIELD

# AT SPRINGFIELD, IL .

Review EC and enclosures, and conduct appropriate investigation.

Verify date/place of birth through BVS..

Set Lead 8:

# WASHINGTON FIELD

## AT WASHINGTON, DC

Review EC and enclosures, and conduct appropriate investigation.

Check White House and USSS.

Check Public Integrity Section at Department of Justice.

CC: PSS

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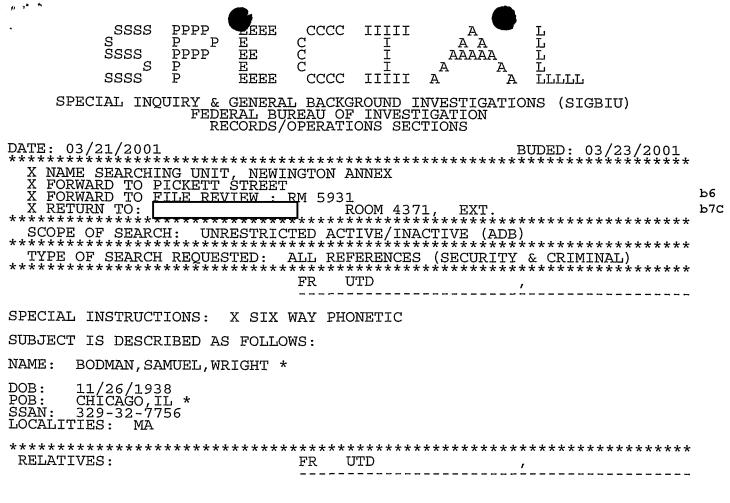
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MAR-21-2001 05:11 ** 03721/01 ** 16:11:54 ** Subject: ** Search: BODMAN, SAMUEL, WRIGHT ** Agency: WHITE HOUSE/SPECIAL INQUIRY ** Cidn : **	Run 1 Page 1 User # 0480	9.02/09 ** ** ** ** ** ** ** ** ** ** **
** Supervisor **	Room Ext	**
** File Review: R# PROD	UTD	**
<pre>** Search DOB : 11-26-1938 Search S ** Rules: SP,N,A,N,Y,N,A,N,N *******************************</pre>	50C: 329-32-7756	** **
BODMAN, SAMUEL, WRIGHT		
Entry date: 03/21/2001 (I) 161B-HQ-1337020		
BODMAN, SAMUEL, W		
True Name: BODMAN, SAMUEL, WRIGHT Entry date: 03/21/2001 <del>(I)-161B-HQ-1337020</del> - <i>CfBO</i>		

.

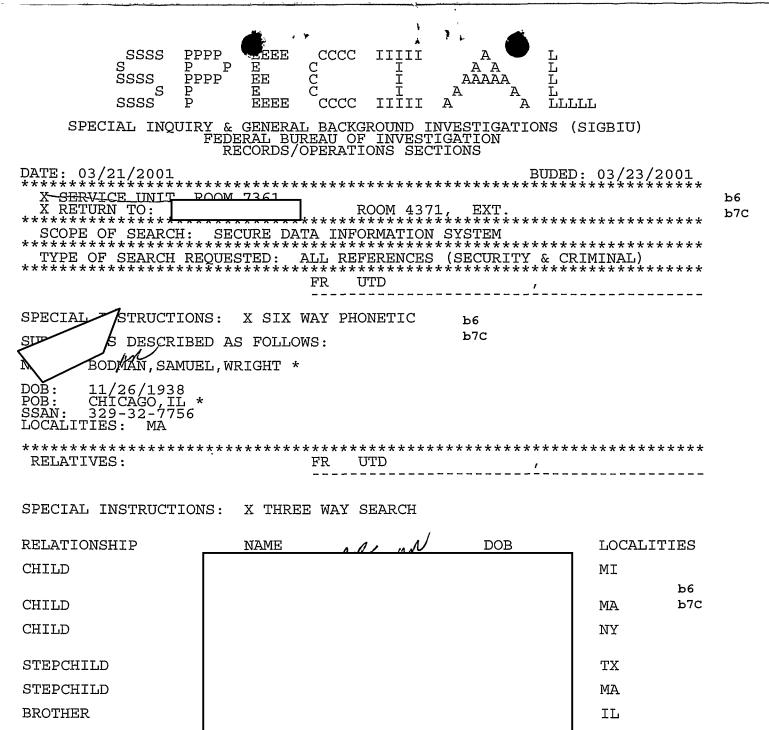
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SPECIAL INSTRUCTIONS: X THREE WAY SEARCH

RELATIONSHIP	NAME	DOB	LOCALIT	IES
CHILD			MI	Ь6 Ь7С
CHILD			MA	Dic
CHILD			NY	
STEPCHILD			TX	
STEPCHILD			MA	
BROTHER			IL	
CURRENT SPOUSE			MA	



MA

CURRENT SPOUSE

2. EDENT CHECK REMOON S FROM: SPECIAL INQUIRY & GENERAL BACKGROUND INVESTIGATIONS CONT, DIV 3, RM ATTN: EXT: PSS b6 SUBJECT: SAMUEL WRIGHT BODMAN BUDED: 03/23/2001 b7C BUREAU FILE NUMBER: 161B-\* THE BUREAU HAS BEEN REQUESTED TO CONDUCT AN EXPEDITE BACKGROUND INVESTIGATION OF THE ABOVE-CAPTIONED SUBJECT, WHO IS BEING CONSIDERED FOR PRESIDENTIAL APPOINTMENT. YOU ARE REQUESTED TO CHECK APPROPRIATE INDICES BASED UPON AVAILABLE INFORMATION CONCERNING SUBJECT, EMPLOYMENT, AND ALL CLOSE RELATIVES. IT IS REQUESTED THAT THE RESULTS OF YOUR CHECK, WHETHER POSITIVE OR NEGATIVE, BE INDICATED IN THE SPACES PROVIDED BELOW, AND RELAYED TO THE SPECIAL INQUIRY & GENERAL BACKGROUND INVESTIGATIONS UNIT, RM 4371 VIA ROUTING SLIP MARKED 'URGENT'. SUBJECT IS DESCRIBED AS FOLLOWS: IT NAME: SAMUEL WRIGHT BODMAN DOB: 11/26/1938 POB: CHICAGO, IL SSAN: 329-32-7756 CURRENT ADDRESS: 40 BATTERY S (2) & printe attached, sent to WV 7-21-01 RESULT NAME: SS: 40 BATTERY ST BOSTON, MA 02109 CABOT CORPORATION **EMPLOYMENT:** 2 SEAPORT LN BOSTON, MA 02210 CLOSE RELATIVES RESULT NAME DOB RESIDENCE **b6** b7C , ON <u>3.21-01</u> CHECK CONDUCTED BY: <u>JN</u> Presidential

MAR-23-2001, 07:58	IIS MELLINGEL MUL	3046256021 P.05		
ICN ISIS00030000059731 BODMAN,SAMUEL WRIGHT MNU SC FPC	.80 CIDN OCA U 600 1938/11/26 OC 329 32 7756 SEX M			
HENRY CLASS	API			
USCIC000Z OFF/COUNSEL/PRSDNT WASHINGTON DC 2001/03/14 A SEARCH OF THE FINGERPRINTS ON THE ABOVE INDIVIDUAL HAS FAILED TO DISCLOSE PRIOR ARREST DATA. CJIS DIVISION				

2001/03/22 FEDERAL BUREAU OF INVESTIGATION

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b6 b7С

USCICO00Z OFF COUNSEL TO PRESIDENT THE WHITE HOUSE OLD EXEC BLDG-RM 136 1600 PENNSYLVANIA AVE NW WASHINGTON, DC 20500-0001

ť 1 % residentes · IDENT CHECK ROOM 11262B TUBE J1, ATTN: FROM: SPECIAL INQUIRY & GENERAL BACKGROUND INVESTIGATIONS UNIT, DIV 3, RM b6 EXT: ATTN: PSS b7C SUBJECT: SAMUEL WRIGHT BODMAN BUDED: 03/23/2001 BUREAU FILE NUMBER: 161B-\* THE BUREAU HAS BEEN REQUESTED TO CONDUCT AN EXPEDITE BACKGROUND INVESTIGATION OF THE ABOVE-CAPTIONED SUBJECT, WHO IS BEING CONSIDERED FOR PRESIDENTIAL APPOINTMENT. YOU ARE REQUESTED TO CHECK APPROPRIATE INDICES BASED UPON AVAILABLE INFORMATION CONCERNING SUBJECT, EMPLOYMENT, AND ALL CLOSE RELATIVES. IT IS REQUESTED THAT THE RESULTS OF YOUR CHECK, WHETHER POSITIVE OR NEGATIVE, BE INDICATED IN THE SPACES PROVIDED BELOW, AND RELAYED TO THE SPECIAL INQUIRY & GENERAL BACKGROUND INVESTIGATIONS UNIT, RM 4371 VIA ROUTING SLIP MARKED 'URGENT'. (2) & prints attached SUBJECT IS DESCRIBED AS FOLLOWS: NAME: SAMUEL WRIGHT BODMAN DOB: 11/26/1938 POB: CHICAGO, IL SSAN: 329-32-7756 CURRENT ADDRESS: 40 BATTER RESULT NAME: DOB: SS: 40 BATTERY ST BOSTON, MA 02109 CABOT\_CORPORATION\_\_\_ EMPLOYMENT: 2 SEAPORT LN BOSTON, MA 02210 CLOSE RELATIVES RESULT DOB NAME RESIDENCE **b6** b7C

CHECK CONDUCTED BY: ON Allose Joy ofter herdbirg to Presidential b6 b7C

CIV APPLICANT RESPONSE

 ICN ISIS000300005973180
 CIDN
 OCA

 BODMAN, SAMUEL WRIGHT
 U 600 1938/11/26

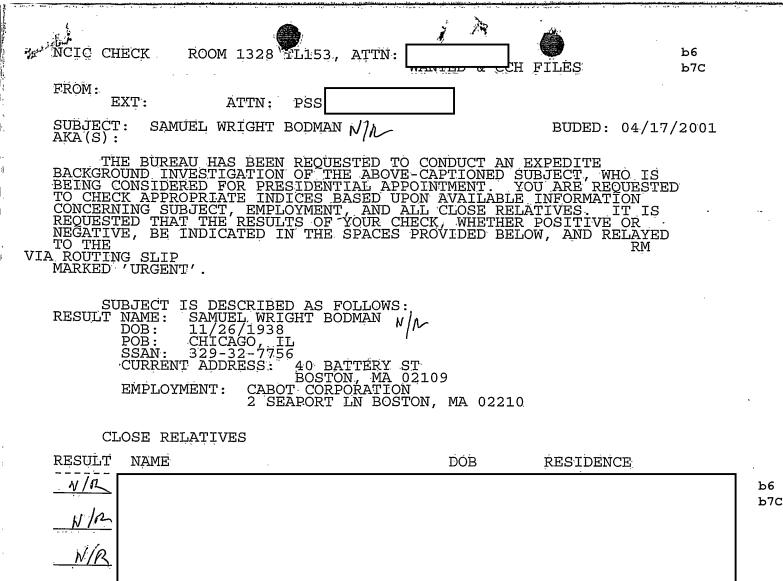
 MNU
 SOC 329 32 7756
 SEX M

 FPC
 HENRY CLASS
 API

17.

USCIC000Z OFF/COUNSEL/PRSDNT WASHINGTON DC 2001/03/14 A SEARCH OF THE FINGERPRINTS ON THE ABOVE INDIVIDUAL HAS FAILED TO DISCLOSE PRIOR ARREST DATA. CJIS DIVISION 2001/03/22 FEDERAL BUREAU OF INVESTIGATION

> USCICO00Z OFF COUNSEL TO PRESIDENT THE WHITE HOUSE OLD EXEC BLDG-RM 136 1600 PENNSYLVANIA AVE NW WASHINGTON, DC 20500-0001



N/n

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ي ) NCIC CHECK (CONT.)

CHECK CONDUCTED BY: 31/10, on 3.21.0

(Rev. 08-28-2000)

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## FEDERAL BUREAU OF INVESTIGATION

Preceder	nce: DEADLIN	NE 04/17/200	1	Date:	03/23/2001
To: Adn	ninistrative	Services	Attn:	SIGBIU Room 4371	
From: I	Detroit Squad 6 <b>Contact:</b>	IA			
Approved	l By:		.0 /		b6
Drafted	By:				ь7с
Case ID	<b>#:</b> 161B-HQ	-1337020-3 (Pe	ending)		
Title:	SAMUEL WRIGH LEVEL II-PAS	HT BODMAN, II 5	I		

Synopsis: Background investigation.

Administrative: Reference Administrative Services communication to Detroit, dated 03/21/2001.

**Details:** A review of FBI Detroit general and automated indices was conducted regarding appointee and appointee's relative. This review failed to reflect any identifiable references.

All investigation in the Detroit Division is completed.

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(01/26/1998)

## FEDERAL BUREAU OF INVESTIGATION

Precedence: DEADLINE 04/17/2001 Date: 03	3/28/2001					
To: Administrative Services Attn: PSS SIGBIU, Room 4371	ь6 L b7C					
From: Chicago Squad A-3 Contact: SSA Ext. 3027						
Approved By: b6 b7C						
Drafted By:						
Case ID #: 161B-HQ-1337020 (Pending) - 4						
Title: SAMUEL WRIGHT BODMAN, III LEVEL II - PAS						
Synopsis: See details below.						
Reference: 161B-HQ-1337020 Serial 2						
Administrative: Chicago's general indices are negative retained the candidate and relative.	egarding					
All investigation has been conducted in the Chicago Division.						
Details: On March 23, 2001, a review was made of Chicago automated and manual indices, and Chicago was unable to I any record regarding the candidate Samuel Wright Bodman, b6 b7c	locate					

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(12/31/1995)

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## FEDERAL BUREAU OF INVESTIGATION

	Precedence: DEADLINE 04/17/2001	Date: 04/09/2001	
	To: Albuquerque, Boston Columbia, Chicago Houston, Jacksonville, New Haven, New York,	Vall Halor PM	
	From: Administrative Services Special Inquiry and General Back Unit (SIGBIU), Room 4371 Contact: PSS	ground Investigations Extension 4755	
_	Approved By:	b6 b7C	
	<b>Case ID #:</b> 161B-HQ-1337020 (Pending)		
	Title: SAMUEL WRIGHT BODMAN, III LEVEL II-PAS Synopsis: Additional background investigat candidate. Administrative: BUDED is 04/17/2001.	ion (BI) on captioned	
	Direct results/questions to PSS FBIHQ, Room 4371, Ext. 4755.	SIGBIU, b6 b7c	
	<b>Details:</b> Directorships of public companies either paid or candidate was given stock of	—	
	LEAD(s):		
ł	Set Lead 1:		
	ALBUQUERQUE		
	AT ALBUQUERQUE, NM		
	Contactat home Interview as colleague/reference for cand: contemporary of candidate at Cabot Oil and Candidate held a directorship from 12/89 t retired. (Note lead to Houston) Also quer candidate responsibilities and compensation	d Gas in Houston TX. to 2000 thereis tryregarding on.	6 7C
099 bg/k0	161B-HQ-13370	120 - 5	

Contact Security Capital Group, Inc., 125 Lincoln Ave., Santa Fe, NM 87501, telephone #505-992-9292 to verify candidate directorship role from 12/90 to present. Knowledgeable work #505individuals (at Security Canital) is b6 422-5000. Interview as a colleague/reference, if b7C possible. Candidate holds a policy making role. Determine nature and responsibilities of role as well as any compensation (stock option etc) received. Review any personnel file, determine any complaints or derogatory information, or conflict of interest issues. Interview two other co-worker, if possible. Note lead to Jacksonville and Columbia Division herein. Note position is advisory and not full time.

Set Lead 2:

BOSTON

AT BOSTON, MA

Read and clear.

Set Lead 3:

COLUMBIA

AT COLUMBIA, SC

Contact who is at for the Ъ6 month of April. Interview as a colleague/reference for b7C candidate. Fuller was a contemporary of candidate at Security Capital Group. Candidate held a directorship from 12/90 to present. Also query regarding candidate responsibilities and compensation. Note lead to Albuquerque herein Note the directorship is an occasional advisory position.

Set Lead 4:

CHICAGO

#### AT CHICAGO, IL

Contact Cabot Microelectronics, Corp., 870 Commons Drive, Aurora, IL 60504, to verify candidate's directorship role from 5/99 to present. Knowledgeable individuals (at Cabot) are: and

work #630-375-6631, home

work #630-375-5529, home

b6 b7C

Interview as a colleagues and references if possible. Candidate holds a policy making role. Generate one other coworker if possible. Review any personnel file, determine any complaints or derogatory information, or conflict of interest Determine type of compensation received and nature of issues. the directorship's responsibilities. Note position is advisory and not full time.

Set Lead 5:

HOUSTON

#### AT HOUSTON, TX

Contact Cabot Oil and Gas Corp., 15375 memorial Drive, Houston, TX 77079, telephone #281-589-4600, to verify candidate directorship role from 12/89-2000. Knowledgeable individual (at work #281-589-4696, home Cabot) is Interview as colleague and reference if possible. **b6** b7C Candidate held a policy making role, generate two other co-worker if possible. Review any personnel file, determine any complaints or derogatory information (Note information regarding in Albuquerque's lead herein.) Determine any compensation received (stock option, fees etc) and nature and responsibilities of the directorship, as well as any conflict of interest issues. Note position is advisory and not full time.

Set Lead 6:

JACKSONVILLE

AT JACKSONVILLE, FL

Contact work #850-820-5226, home b6 Interview as colleague/reference for candidate. b6 was a contemporary of candidate at Security Capital Group, Sante Fe, NM. Candidate held a directorship from 12/90 to present. Also query regarding candidate responsibilities and compensation. Note lead to Albuquerque herein. Note the directorship is an occasional advisory position.

Set Lead 7:

NEW HAVEN

#### AT NEW HAVEN, CT

Contact Westvaco, Inc	., 1 High Ridge Pk.,	Stamford CT	
06905, to verify candidate direc	torship role from 12	<u>/87</u> to	
present. Knowledgeable individu	als are	work	b6
#203-461-7550, <u>home</u>	and	work #203-	b7C
461-7505, home			

Interview as a colleague and reference if possible. Candidate holds a policy making role. Review personnel file, determine any complaints or derogatory information, or conflict of interest issues. Determine type of compensation received and nature of the directorship's responsibilities. Note position is advisory and not full time. Note lead to New York herein. Set Lead 8:

NEW YORK

AT NEW YORK, NY

Contact Westvaco, Inc., 299 Park Ave., New York, NY, telephone #212-688-5000, to verify candidate directorship role from 4/87 to present. Knowledgeable individual is b6 work #212-318-5210 (at Westvaco), home # b7c

**5** -

Interview as a colleague and reference if possible. Candidate holds a policy making role. Review personnel file, determine any complaints or derogatory information, or conflict of interest issues. Determine type of compensation received and nature of the directorship's responsibilities. Note position is advisory and not full time. Note lead to New Haven herein.

CC: ♦♦	1	-	PSS		
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b6 b7С (Rev. 10-01-1999)

## FEDERAL BUREAU OF INVESTIGATION

<b>Precedence:</b> DEADLINE 04/17/2001 <b>Date:</b> 04/09/2001					
To: Administrative Services Attn: PSS Ext. 4755 b6	С				
From: Miami Miami Liaison Office Contact: Ext. 7467					
Approved By: b6					
Drafted By:					
Case ID #: 161B-HQ-1337020 (Pending)					
Title: SAMUEL WRIGHT BODMAN, III LEVEL II-PAS					
Synopsis: Lead covered Nassau, Bahamas.					
Administrative: 161B-HQ-1337020 Serial 2					
Details: The purpose of this communication is to provide FBIHQ with the results of requested investigation concerning above- captioned Presidential Appointee. On 4/9/01, b6					
, advised SSA b70 that an arrest check was conducted for samuel Wright Bodman, Date b71					
- CHAC AN ATTESC CHECK WAS CONDUCCED FOT SAMUET WITGHT BOUMAN, DALE					

of Birth 11/26/38, and results were negative.

161B-HQ 133070--Ce

To: Administrative Services From: Re: 161B-HQ-1337020, 04/09/2001

LEAD (s):

\* 2° \* \*

Set Lead 1:

## ADMINISTRATIVE SERVICES

AT SPECIAL INQUIRY

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Read and clear.

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## FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD	ï	
SPRINGFIELD	FBIHQ	04/09/2001	04/05/2001		
TITLE OF CASE		REPORT MADE BY		TYPED rd	<sup>ВҮ</sup> ь6 ь7с
SAMUEL WRIGHT BODMAN, III		CHARACTER OF C LEVEL II-			

**<u>REFERENCE</u>**: Administrative Services EC to Boston, et al., dated 03/21/2001.

#### ADMINISTRATIVE DATA:

#### - ALL SPRINGFIELD LEADS COVERED -

All persons interviewed were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted.

Springfield indices were negative for the candidate and the names listed on the application covered by the Springfield Division.

APPROVED $\mathcal{B} \mathcal{B} \mathcal{A} \mathcal{M}$ IN CHARGE	DO NOT WRITE IN SPACES BELOW
COPIES MADE: (2) - FBIHQ (161B-HQ-1337020) Attn: SIGBIU, Rm.4371 PSS 1 - SI (161B-HQ-1337020) CC DESTROYED	b6 b7C
DISSEMINATION RECORD OF ATTACHED REPORT       Agency       Request Recd.       Date Fwd.       How Fwd.       By	Notations A*

4

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### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

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Copy to:

Report of: Date:	IA 04/09/2001	Office: Springfield	Ь6 Ь7С
Case ID #:	161B-HQ-1337020		
Title:	SAMUEL WRIGHT BODMAN, III		

Character: LEVEL II-PAS

Synopsis: Birth verified.

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

161B-HQ-1337020 RD/rd <u>1</u>

BIRTH

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The following investigation was conducted 04/05/2001, by Investigative Analystat Springfield, Illinois.	Ь6 Ь7С
Bureau of Vital Records, Illinois Department of Public Health, advised birth certificate number 6046388 filed 1.2/05/1938, reveals Samuel Wright Bodman, III was born 11/26/1938, at Chicago, Illinois.	Ь6 Ь7С

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(01/26/1998)

## FEDERAL BUREAU OF INVESTIGATION

Preceder	nce: DEADLIN	JE 04/17/2001			Date:	04/11/2001
To: Adn	ninistrative	Services	Attn:	SIGBIU, PSS	Room 43	371
From: S	San Antonio Contact:				1	56
Approved	l By:		$\mathbf{r}$		1	o7C
Drafted	By:					
Case ID	#: 161B-HQ-	-1337020 (Per	- nding) -	-8		
Title:	SAMUEL WRIGH LEVEL II - H	HT BODMAN, II PAS	i			

Synopsis: San Antonio indices reviewed regarding the appointee's relative are all negative.

Reference: 161B-HQ-1337020 Serial 2

Administrative: All persons interviewed were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted.

Details: San Antonio indices were reviewed regarding the appointee's relative, and all b6 b7c were negative.

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(12/31/1995)

## FEDERAL BUREAU OF INVESTIGATION

**Precedence:** DEADLINE 04/17/2001 Date: 04/12/2001 To: Baltimore Boston Miami-. ... From: Administrative Services Special Inquiry and General Background Investigations Unit (SIGBIU), Room 4371 Contact: PSS Extension 4755 Approved By: **b**6 b7C Drafted By: Case ID #: 161B-HQ-1337020 (Pending) Title: SAMUEL WRIGHT BODMAN, III LEVEL II-PAS Synopsis: Additional background investigation (BI) on captioned candidate. Administrative: BUDED is 04/17/2001. b6 b7C SIGBIU, Direct results/questions to PSS FBIHQ, Room 4371, Ext. 4755. Details: Trusteeships of non profit organizations. LEAD(s):Set Lead 1: BALTIMORE AT CALVERTON, MD regarding candidate's role and Interview compensation (if any) as a Trustee at MITRE in Virginia. Ъ6 Determine if candidate set policy or made decisions for MITRE. b7C Determine MITRE's function. MITRE is a non-profit organization. Interview her as a reference as well. home telephone number is

161B-HQ-1337020-9

102 Kghol. wpd

Set Lead 2:

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BOSTON

AT BOSTON, MA

Read and clear.

Set Lead 3:

MIAMI

AT PALM BEACH, FL

Interview regarding candidate's role and compensation (if any) as a Trustee at the French Library and Cultural Center. Determine if candidate set policy or made decisions for the French Library and Cultural Center. Determine function of Library. Interview her as a reference as well. home number until 4/25 is

CC: 1 - PSS

b6 b7С

## FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD	
ALBUQUERQUE	BUREAU	04/10/2001	04/10/2001 - 04/11/	1
TITLE OF CASE SAMUEL WRIGHT BODM	AN, III	REPORT MADE BY SA CHARACTER OF C. LEVEL II -		Jds

## <u>DEADLINE:</u> 04/17/2001

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#### **REFERENCE:**

Bureau facsimile with attached Electronic Communication (EC) dated 04/09/2001.

### ADMINISTRATIVE:

All persons interviewed were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted.

Albuquerque Confidential and Elsur indices negative regarding the appointee.

APPROVED	SPECIAL AGENT IN CHARGE		DO NOT WRITE IN SPACES BELOW		
ATTN: PSS ROOM 1-ALBUQUERQUE	$\frac{4371 \text{ SIGIU}}{(161B-HQ-1337020)} - 10$				b6  
DISSEMINATION RE	CORD OF ATTACHED REPORT	Notations			
Agency					
Request Recd.		-			
Date Fwd.		1			
How Fwd.		-			
By		1			
	CO	A /ER PAGE			

### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of: Date:	April 11, 2001	b6 b7С	Office: ALE	UQUERQUE
Case ID #:	161B-HQ-1337020			
Title:	SAMUEL WRIGHT BODM	AN, III		
Character:	SPIN			

Synopsis: Two (2) of candidate's references interviewed all information provided was positive. One co-worker of candidate interviewed, information provided was positive.

DETAILS:

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

\* ~ \*

161B-HQ-1337020 JDS:jds

### REFERENCE

1

The following investigation was conducted by Federal b6 Bureau of Investigation (FBI) Special Agent (SA) on b7c April 10, 2001:

AT SANTA FE, NEW MEXICO

	date of birth	<b>]</b> social
security account number		
Santa Fe, New Mexico, home	e telephone number	
was contacted in reference to the	his background investigati	
was advised the identity of as the nature of the interview. expecting to be contacted by the in reference to the candidate. provisions of the Privacy Act. information:	stated that he had Federal Bureau of Invest	l been b7c igation he
first met the ca early 1970. At the time, the ca professor at a college in the no an individual to work with needed an individual that technical know-how as well as bu recommended to for the jok made the recommendation. Since candidate have been friends.	ortheast. was looki at a venture capitol gro possessed a high degree c usiness savoy. The candid b. did not remember	ь6 ng for ь7с oup. of late was
The candidate was the when the candidate asked of Directors for Cabot Oil and ( spino <u>ff of</u> Cabot Corporation. time, got to know the cand	accepted the position	he Board b6 us a b7c
described the caresponsible for thousands of emp shareholders. stated that corporation, that corporation be	t the candidate ran the er	lS b7C
low as compared to others in the expressed on numerous occasions should be in direct correlation	that the candidate's comp	lidate b6 pensation b7c was

#### 161B-AQ-1337020

150,000 shares of stock in the company when first arriving at the company. The money for these shares came from the candidate's own money.

advised that the candidate has an excellent character. The candidate is very honest and straight-forward. <sup>b6</sup> The candidate is always upbeat. The candidate is one of the most <sup>b7C</sup> reliable individuals that has ever meet. The candidate has demonstrated the ability to use discretion when appropriate.

knows of no disreputable or disloyal individuals, organizations, or groups which the candidate associates. \_\_\_\_\_\_ b6 went on further to state that the candidate's reputation on a personal level is incredible. On a professional level, the candidate's reputation is just as stellar. People, according to view the candidate as a hard worker who follows rules.

When asked to talk about the candidate's loyalty to the b6 United States of America, responded by saying that the b7C candidate is extremely loyal and has always followed the laws of the land. The candidate has never expressed any sympathies toward any foreign governments to

believes that the candidate is brilliant and is believes that the candidate is brighter than all of them. has witnessed the candidate interact with people from all over the world and from all different backgrounds. According to the candidate deals fairly and honestly with all people.

went on further to advise that the candidate has never expressed a prejudice toward any ethnic group or person. stated that the candidate was not that type of person. further elaborated by detailing how the candidate has promoted individuals based only on performance without regard to skin color.

> b6 b7С

knows that the candidate is financially responsible and lives well within the candidates means.

drug or alcohol abuse at any time by the candidate. He is also unaware of any illegal drug use or selling of illegal drugs at any time by the candidate.

would show the candidate to be unreliable or dishonest.

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161B-AQ-1337020

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knows of no illness which would force the candidate to become unreliable or interfere with the candidate's decision making ability. The candidate is highly ethical and could not be pressured or influenced to act in a way contrary to the best b6 interest of the United States of America. Stated that the b7C candidate has such a great reputation that believes nobody would attempt to gain a favor from the candidate.

would recommend the candidate for any sensitive b6 position with the United States of America. Stated that b7C the candidate is one of the most honorable individuals has ever known in his life. 161B-HQ-1337020 JDS:jds

#### REFERENCE

1

The following investigation was conducted by Federal <sup>b6</sup> Bureau of Investigation (FBI) Special Agent (SA) pn <sup>b7C</sup> April 11, 2001:

AT SANTA FE, NEW MEXICO

security account number	
phone numberwas contacted inreference to this background investigation.was advised	Ъ6 Ъ7С
attended Cornell University. The candidate also attended Cornell	Ь6 Ь7С

As a member of the Board of Directors, the candidate meets at least four times a year with other board members. Additionally, the candidate conducts numerous conference calls and telephone calls as a member of the Board of Directors. was uncertain of the candidate's salary, but did advise that the candidate was worth much more than what the candidate was being paid. expressed that he and the business would greatly miss the candidate and the candidate's expertise.

Ъ6

b7C

#### 161B-HO-1337020

2

b6 described the candidate's character as **Ъ7С** outstanding. The candidate is always one hundred percent, truthful with everyone. The candidate is always honest. described the candidate as brilliant.

has never known the candidate to spend any time **h**6 with individuals or groups of individuals that display negative b7C traits.

The candidate's reputation at work and socially is People know the candidate to be upstanding and a hard positive. worker.

stated without a doubt that the candidate is b6 loyal to the United States of America. b7C The candidate has expressed no sympathies toward any foreign governments that is aware of.

With respect to the candidate's abilities and stated that the candidate is one of the qualifications, **b6** most intelligent individuals that has ever known. b7C stated that the candidate has very good interpersonal skills as well. The candidate pushes people to do their best. The candidate is qualified to do any job.

**b**6 The candidate has expressed no bias or prejudice in front of loes not believe that the candidate cares whether or not a person is black or white. The candidate treats all equal.

The candidate lives within the candidate's means. knows first hand that the candidate is financially responsible.

stated that he is unaware of any prescription **b6** drug or alcohol abuse at any time by the candidate. He is also b7C unaware of any illegal drug use or selling of illegal drugs at any time by the candidate.

is unaware of any actions displayed by the b6 candidate that show the candidate to be unreliable or not b7C trustworthy. The candidate has no illness that would impair the candidate's ability to make decisions. stated that the candidate could not be influenced to behave in a manner inconsistent with the candidate's value system.

b7C

b6 b7C

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161B-HQ-1337020

3

Without hesitation, stated that he would b6 recommend the candidate for any position of trust with the United b7c States of America.

166B-HQ-1337020 JDS:jds

a.

### COWORKER

The following investigation was conducted by Federal Bureau of Investigation (FBI) Special Agent (SA) on b6 April 11, 2001: b7c

AT SANTA FE, NEW MEXICO

date of birth social security	_
account number	
phone number was contacted in reference to this background investigation. serves as senior vice president of Security Capital Group. was advised of the identity of the interviewing agent and the nature of the interview. was also provided with the provisions of the Privacy Act. furnished the following information:	ь6 ь7с
joined the above business in 1999. Before that time served as an attorney in California. met the candidate in 1995 at a board meeting. The candidate was already serving as a director for Security Capital Group. knows the candidate well on a professional level.	Ъ6 Ъ7С
described the candidates character as being outstanding. He is known as being honest and hard working. Additionally, the candidate is known as being direct with people and a good listener.	b6 b7С
does not know what kind of individuals or groups of people that the candidate spends time with. does not know the candidate well enough to have learned that kind of information.	b6 b7С
knows that the candidate has an excellent professional reputation. The candidate is thought highly of by those that have had a chance to interact with the candidate.	b6 b7С
The candidate has never expressed any sympathies toward foreign governments around believes the candidate to be very loyal to the United States of America.	Ъ6 Ъ7С
also believes that the candidate is qualified for most any job. The candidate is a hard worker who is always well prepared.	Ь6 Ь7С

1

2

The candidate has never expressed any negative feelings b6 toward any racial or ethnic groups. stated that the b7c candidate does not even tell "off color' jokes.

hid not know whether the candidate lived within b6 the candidates means. He did believe the candidate to be b7c financially responsible.

stated that he is unaware of any prescription b6 drug or alcohol abuse at any time by the candidate. \_\_\_\_\_\_ is b7c also unaware of any illegal drug use or selling of illegal drugs at any time by the candidate.

stated that he has seen no behavior displayed by the candidate that would cause someone to believe that the candidate is unreliable. believes the candidate to be very b6 honest. does not know of any illness which could interfere b7c with the candidate's ability to make decisions. The candidate has very high values and would never compromise those values, according to b6

b7C

would highly recommend the candidate for a position of trust with the United states of America.

furnished copies of numerous documents reflecting b6 compensation provided to the candidate while employed by Security b7c Capital Group. These items are attached to this report. SECURITY CAPITAL GROUP INCORPORATED Class A Shares Received as Director's Fees by Samuel W. Bodman

DATE	Description	Class A Shares	Price / Share	Certificate #	Certif. Sh. Amt.	Book entry shares
9/30/95	Director fees 3Q'95	2.000	\$920.06	#128	2	-
12/31/95	Director fees 4Q '95	Deferred	\$1,016			
3/31/96	Director fees 1Q '96	Deferred	\$1,045			
6/30/96	Director fees 2Q '96	Deferred	\$1,068		1 1	
9/30/96	Director fees 3Q '96	Deferred	\$1,067			
12/31/96	Director fees 4Q'96	5.000	\$1,247	#1172	5	
3/31/97	Director fees 1Q '97	7.000	\$1,236	#1410	7	
6/30/97	Director fees 2Q '97	6.000	\$1,274	#1434	6	
9/30/97	Director fees 3Q'97	5.072	\$1,725	#1385	5	0.072
12/31/97	Director Fees 4Q'97	5.538	\$1,580	#1552	5	0.538
12/31/97	fractional shares issued 3Q/95, 4Q'96, 1Q'97 and 2Q '97	4.337	¢1,000			4.337
3/31/98	Director fees 1Q'98	5.682	\$1,540	#1571	5	0.682
6/30/98	Director fees 2Q'98	6.579	\$1,330	#1595	6	0.579
9/30/98	Director fees 3Q'98	9.615 j	\$910	#1669	9	0.615
12/31/98	Director fees 4Q'98	17.803	\$660	#1688	17	0.803
	Disc. (and free 4.0100	10.450		<i></i>		
3/31/99	Director fees 1Q'99	13.158	\$665	#1721	13	0.158
6/30/99	Director fees 2Q'99	12.500	\$700	#1749	12	0.500
9/30/99	Director fees 3Q'99	12.069	\$725	#1785	12	0.069
12/31/99	Director fees 4Q'99	18.952	\$620	#1803	18	0.952
3/31/00	Director Fees 1Q 2000	12.590	\$695	#1816	12	0.590 -
6/30/00	Director Fees 2Q 2000	10.587	\$826.50	#1830	10	0.587
9/30/00	Director Fees 3Q 2000:			#1852	15	0.665
8/16/00	Bd. Meeting attend.fee	1.579	\$950			
8/22/00	Nom. Comtee attend.fee	1.667	\$900			
9/19/00	Bd. Meeting attend.fee	1.604	\$935			
9/25/00	Bd. Meeting attend.fee	1.604	\$935			
9/30/00	Retainer	9.211	\$950			
12/31/00	Director Fees 4Q 2000:			#1861	21	0.673
11/7/00	Bd. Mtg. attend. fee	1.579	\$950			
11/17/00	MDCC mtg. attend.fee	1.543	\$972			
12/12/00	MDCC mtg. attend.fee	1.554	\$965			
12/12/00	Nom. Comttee attend.fee	1.554	\$965			
12/13/00	Bd. Meeting attend.fee	1.554	\$965			
12/31/00	Retainer + MDCC chair	13.889	\$990			
	TOTALS	191.820			180.000	11.820

3/6/01 Bodman.\$.xls users\gk\group

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# SECURITY CAPITAL GROUP INCORPORATED COMPENSATION PAID TO DIRECTORS

# SAMUEL W. BODMAN

# <u>2000</u>

Cash Received	000
Stock Received	\$53,500.00
Deferred Fee	000
Total	\$53,500.00

## <u>1999</u>

Cash Received	000
Stock Received	\$38,000.00
Deferred Fee	000
Total	\$38,000.00

## <u>1998</u>

Cash Received	000
Stock Received	\$38,000.00
Deferred Fee	000
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# Personnel Option Status

SECURITY CAPITAL GROUP Incorporated ID: 36-3692698 125 Lincoln Avenue Santa Fe, NM 87501

Page: 1 File: Optstmt Date: 1/15/01 Time: 1:14:33 PM

AS OF 12/31/00

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### SAMUEL W. BODMAN C/O CABOT CORPORATION 75 STATE STREET BOSTON, MA 02109-1806

ID: 329-32-7756

Number	Option Date	Plan	Туре	Granted	Price	Exercised	Vested	Cancelled	Invested	Outstanding	Exercisable
00000011	8/27/1992	91AS	NQ	230.066	\$123.010000	0.000	230.066	0.000	0.000	230.066	230 066
00000012	8/27/1992	91AS	NQ .	142.141	1,046.000000	0.000	142.141	0.000	0.000	142.141	142 141
00000015	8/27/1992	R1AS	NQ	254.000	\$242.500000	0.000	254.000	0.000	0.000	254.000	254 000
00000016	8/27/1992	R1AS	NQ	256.362	1,046.000000	0.000	256.362	0.000	0.000	256.362	256 362
00000864	8/27/1992	R1AS	ISO	100.000	\$242.500000	0.000	100.000	0.000	0.000	100.000	100 000
00000013	1/1/1993	92AS	NQ	778.144	\$227.210000	0.000	778.144	0.000	0.000	778.144	778,144
00000014	1/1/1993	92AS	NQ	338.601	1,046.000000	0.000	338.601	0.000	0.000	338.601	338.601
00001185	9/17/1996	Bd96	NQ	150.000	1,066.000000	0.000	150.000	0.000	0.000	150.000	150.000
00001216	1/1/1997	Bd96	NQ	150.000	1,237.000000	0.000	150.000	0.000	0.000	150.000	150.000
00001545	1/1/1998	Bd96	NQ	150.000	1,580.000000	0.000	150.000	. 0.000	0.000	150.000	150.000
				2,549.314		0.000	2,549.314	0.000	0.000	2,549.314	2,549 314

Information Currently on File										
Тах	Rate %	Broker	Registration		Alternate Address					
Federal Social Security Meticare	28.000 6.200 1.450			an an <u>an an an</u>						

## Personnel Option Status

Security Capital Group Class B Shares ID: 36-3692698 125 Lincoln Avenue Sante Fe, NM 87501

Page: 1 File: Optstmt Date: 1/15/01 Time: 12:51:51 PM

AS OF 12/31/00

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4

## SAMUEL W. BODMAN C/O CABOT CORPORATION 75 STATE STREET BOSTON, MA 02109-1806

ID: 329-32-7756

Number	Option Date	Plan	Туре	Granted	Price	Exercised	Vested	Cancelled	'nvested	Outstanding	Exercisable
00000215 00000515	1/1/1999 1/1/2000		NQ NQ	7,500.000 7,500.000	\$13.562500 \$12.500000	0.000 0.000	7,500.000 7,500.000	0.000 0.000	0.000 0.000	7,500.000 7,500.000	7,500 000 7,500.000
				15,000.000		0.000	15,000.000	0.000	0.000	15,000.000	15,000 000
							:				
Information	n Currently on	File				· · · · · · · · · · · · · · · · · · ·			·····		
Tax	R	ate %		Brok	er		Registration		AI	ternate Address	



## **INTEROFFICE MEMORANDUM**

то:		ь6 ь7с
FROM:		
DATE:	April 10, 2001	
SUBJECT:	Samuel W. Bodman	

During the period of 2000, Mr. Bodman received a total of <u>\$53,500 in director fees</u> and <u>meeting attendance fees</u> for serving as a director of Security Capital Group Incorporated ("Security Capital"). Mr. Bodman received a total of <u>60.517 Class A Shares</u> of Common Stock of Security Capital, as he elected to receive his director fees in the form of shares based on the current fair market value of the Class A Shares.

## First Quarter 2000

Director fee - \$8,750

12.590 Class A Shares issued to Mr. Bodman based on the March 31, 2000, market value of \$695 per Class A Share of Security Capital.

#### Second Quarter 2000

#### Director fee - \$8,750

10.587 Class A Shares issued to Mr. Bodman based on the June 30, 2000, market value of \$826.50 per Class A Share of Security Capital.

#### Third Quarter 2000

## Director Fee - \$8,750

9.211 Class A Shares issued to Mr. Bodman based on the September 30, 2000, market value of \$950 per Class A Share of Security Capital.

I:\LEGAL\memos\MEMO.Bodman.DOC

September 25, 2000, Board of Director Meeting Attendance Fee - \$1,500

1.604 Class A Shares issued to Mr. Bodman based on the September 25, 2000, market value of \$935 per Class A Share of Security Capital.

September 19, 2000, Board of Director Meeting Attendance Fee - \$1,500

1.604 Class A Shares issued to Mr. Bodman based on the September 19, 2000, market value of \$935 per Class A Share of Security Capital.

August 22, 2000, Nominating and Corporate Governance Committee Meeting Attendance Fee - \$1,500

1.667 Class A Shares issued to Mr. Bodman based on the August 22, 2000, market value of \$900 per Class A Share of Security Capital.

August 16, 2000, Board of Director Meeting Attendance Fee - \$1,500

1.579 Class A Shares issued to Mr. Bodman based on the August 16, 2000, market value of \$950 per Class A Share of Security Capital.

### Fourth Quarter 2000

Director Fee - \$8,750

Annual Fee for serving as Chairman of the Management Development and Compensation Committee - \$5,000

13.889 Class A Shares issued to Mr. Bodman based on the December 31, 2000, market value of \$990 per Class A Share of Security Capital.

December 13, 2000, Board of Director Meeting Attendance Fee - \$1,500

1.554 Class A Shares issued to Mr. Bodman based on the December 13, 2000, market value of \$965 per Class A Share of Security Capital.

December 12, 2000, Nominating and Corporate Governance Committee Meeting Attendance Fee - \$1,500

1.554 Class A Shares issued to Mr. Bodman based on the December 12, 2000, market value of \$965 per Class A Share of Security Capital.

December 12, 2000, Management Development and Compensation Committee Meeting Attendance Fee - \$1,500

1.554 Class A Shares issued to Mr. Bodman based on the December 12, 2000, market value of \$965 per Class A Share of Security Capital

November 17, 2000, Management Development and Compensation Committee Meeting Attendance Fee - \$1,500

1.543 Class A Shares issued to Mr. Bodman based on the November 17, 2000, market value of \$972 per Class A Share of Security Capital.

November 7, 2000, Board of Director Meeting Attendance Fee - \$1,500

1.579 Class A Shares issued to Mr. Bodman based on the November 7, 2000, market value of \$950 per Class A Share of Security Capital.

On January 1, 2000, Mr. Bodman was granted an option to buy <u>7,500 Class B Shares of</u> Common Stock of Security Capital at a price of <u>\$12.50 per share</u>. On January 1, 2001, Mr. Bodman was granted an option to buy <u>6,500 Class B Shares of Security Cap</u>ital at a price of <u>\$20.0625 per share</u>. The options were issued to directors of Security Capital under the Security Capital Group Incorporated 1996 Outside Directors Plan.

FD-340 (7-19-00)			ć	3	
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\* Alulor b7C Inturey Act Joined SCG In JAN OF 1996. WAS AT law form In Las Argles Color Konvin, Jehu Course here. Meet S.B. In Nec of 95 AT A SCG board MEETING S. B WAS Allerely A diverson of SCG IN ARound 1990. 2000 - SB Rocerved 60.517 Class A Shan of Sch for direction fees (\$3,500) JAM 1- Gers OPTION TO PURCHAS 7500 Shaves of Chors & STOCK

Never - No off Color Jokes CAN'T express op Ju Jon Alco/P.D Socral. Neven seen drunk- propen Nothing About Pres. Madrantion USE/SELL\_ Never seen. SECURITY - SPETS his own Council - Someone CAN'T FET Jo hom. He volker his Reputrition No Ellness Hecominal Very arsener. high values. . Yes

Think the world of him Veny decent pensor. Would be Sonny to See him go.

He locetued to Spectal Deals Compensation package IS conparestable to OTHERS The The Industring Bodman IS ChAJERIAN OF the Conpensation Connister, Been A very good Chatreman, Nosponstble, preparect, Int. of Coupany/ shareholder ( Annaever honest, prepared, hand thetaken, good / 7502en Envenupos when some does Not Mare Star Ass. UNKNOW - NOT SOCIAL w/ him REPUTATION excellent prof/bus. leg. Loynly Nover AQ

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Reference: <u>INSERT ON</u> <u>Y/10/01</u> (Communication Enclosing Material)	
Description: Criginal notes re interview of b6 b7C	

SAMIS Job - pres + COO AT CABOT CORP. , CEO - han the Corporation - Resp TO employees & shareholden ALL over would OMPRASATION - SALARY LOW US. INDUSTRY PARI # of Times told Compensation Committee that bonus should be low. Noed to equal how business is pontanting - NOT ON COMPONSATION BOARD bo He basht plot of stock Right when he becau the C.O.O. Maybe 150,000 shores (30 per shore) thou has our to - SAUJUTS

4/10/01 161B-HQ-1337020 X7:15 no TRIVACY ACT OK CHARACTER (houest - STRAIGHT forward) ATTITUde (very upherat - Confident) Trustwarthy ( highly) Reliable ( Absolutely) DISCRETION ( YES) ASSOCIATES What kind of Ind/groups KEPUTATION POSTTOL ( Comm Rep -Professional Rep - (Excellent-honest) Vers. Pep - (highly pospacied - STRATGHT foreward) LoyAlty to U.S.? Absolutely - NEOLAXE LAW/POLICY Sympathy to forestan

- AbILITY/OUNDIFICATIONS YESS 0 BIAS/PREJUCITIO Oh NO, went out of MAY TO be PROACTOR = FINANCER STADE LETY TEVES NOT MEANS & IT'S & ROSPONSTELY. Alcohol/ Ine. drugs (Son IS Alcohelie) Never - Social dranker only - Unuq usel sell NEVER - NOT FUER Security (a) No (b) NO ILLASSES NO (c) Never- higly pricipled Deconwend. Yes - Job dutizes + Compensation

KelAttorship staried In early 70 In HOLESVOR. SAM WAS A professon AT MIT & wonked An A Venture CAPITOL Conoup. I was looking how someone of Jechnocal know how & buseness SAVY. Som was leconnerded to Me. Been dose Intends SINCE THAT JUY. HORO OJI CORP. - Ne longen In EXISTENCE. (Abot OJL & GAS \$5 SPIR OF of CADOT CORP. - SAM WAS CHAJRMAN CADOT OT + GAS WAS A SMALL PART OF that Corporation. SAM Asked he to con ON the board of Cabot Corp. As A every expert / chemocal expert. Spin our 100% of Cabor Oil + GAS. I was CHASEMEN. 3 Of CABOUT desuscion CHILL ON MY bOAND. I STAYED ON ( ALOT CORP borand.

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4/11/01 b7C \* KNEWACY ACT both news to Cornell. Dig not know each other. AT young life he beensui preside T of Fideletri. I STARIE SECURITY IN 1991 MUT TOGETHU A group of DINECTORS. I ment to Bodman, I knew him by then. Asked him to be A diversion He expressed Firewest he unnoed ma Information, The Accepted. He become a Corponase dry 4 aleevers panully More Phan neering , Best dinector In FIRM. We the public Coupany on NYSE

Alcohol/ Pues Drings UNK. Pres. drugs - Soctof dutulien Drug use/Sell Never - Ext supresed. Unigs Not THE WEOMABLE AT CONcel IN THE 60" DeunITY FILMESS ? NONE COERCEON? NO WAY IN WORLD-Ronnend No one this I would laonend Mon highly, I ome have Northere & ware be Coupleleby honest up you shows home I do not WANT TO lose how,

hausener honest basiliont 100% TRUST WONTHY Acurrys disserver Demonditury Hss. UPSTALLINJ REPUTATION Covers Nepuration (londer) apty W/O A JoubT. A/Q Conent BTAS/Pre Shown None - expressed NO bINS FED STAL Were after meaning

Precedence: DEADLINE 04/17/2001

Date: 04/12/2001

To: MAdministrative Services

(Rev. 08-28-2000)

Attn: SIGBIU PSS b6 Room 4371; 4755 b7c

~y		a ad 7, Greenville Resident Agency act: SA	
	Approved By:		ь6 b70
	Drafted By:		<i>Б</i> /С

Case ID #: 161B-HQ-1337020-1 (Pending)

Title: SAMUEL WRIGHT BODMAN, III; LEVEL II-PAS

Synopsis: To report information about captioned matter.

Administrative: All persons interviewed were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted.

Columbia indices negative regarding appointee, all relatives, and references residing in South Carolina.

Details: Original lead for Columbia	<u>a to co</u> ntact
reference of candidate, at	had an incorrect area b6
code. Information was received that	
	tempted to call telephone
number and found the	number is disconnected;
therefore, reporting Agent was unab. interview.	le to contact and

To: Administrative Services From: Columbia Re: 161B-HQ-1337020, 04/12/2001

LEAD(s):

Set Lead 1: (Adm)

### ADMINISTRATIVE SERVICES

## AT WASHINGTON, D.C.

Read and clear.

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# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD		
NEW HAVEN	BUREAU	04/16/2001	4/11/01 - 4/16/01		
TITLE OF CASE		REPORT MADE BY		TYPED BY	
SAMUEL WRIGHT BODM	AN, III	SA		amd	b6
		CHARACTER OF C			b7C
		LEVEL II -	PAS		

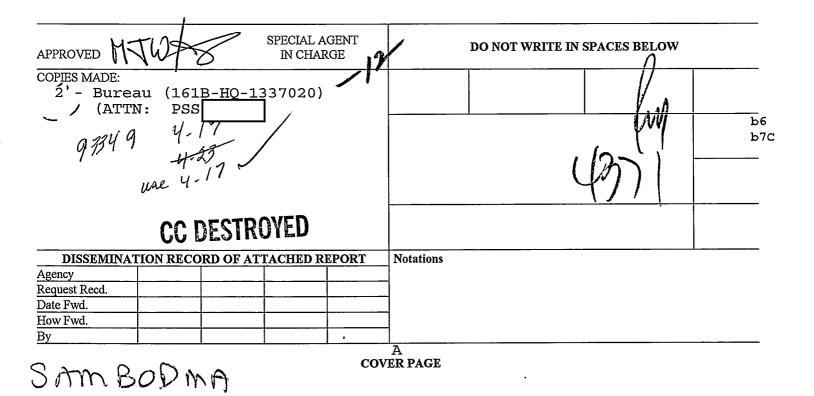
REFERENCE: Bureau EC to Albuquerque, ETAL, 04/09/2001.

#### ADMINISTRATIVE:

All persons interviewed have been provided the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted.



New Haven indices are negative for candidate.



FD-204 (Rev. 12-1-95)

#### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of: Date:	SA 04/16/2001	Office:	New	Haven	b6 b7С

Case ID #: 161B-HQ-1337020

Title: SAMUEL WRIGHT BODMAN, III

Character: LEVEL II - PAS

Synopsis: Board membership verified.

#### **DETAILS**:

Member/Director of Board WESTVACO Inc. 1 High Ridge Park Stamford, Connecticut 06905 December, 1987 to Present

WESTVACO Inc., 1 High Ridge Park, Stamford, Connecticut, advised he met the candidate about b6 six years ago. stated the candidate is a member of b7C the Board of Directors and as such offers guidance and direction for the company. stated the board meets approximately eight times per year and the candidate receives approximately \$40,000 to \$50,000 per year compensation. He stated the candidate is well prepared and attends all meetings.

He considers the candidate to be a person of unimpeachable character. Those who associate with the candidate are well regarded also, according to \_\_\_\_\_. The candidate enjoys an unblemished reputation and the candidate's lovalty to the United States of America is above question \_\_\_\_\_\_ advised. \_\_\_\_\_\_ stated he has never

b6 b7С

#### 161B-HQ-1337020

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known the candidate to use, buy, sell, distribute or manufacture any illegal narcotic substances or to abuse prescription drugs. He said he consider the candidate to be financially responsible and one who lives within his means. He said he has never known the candidate to harbor any prejudices or biases against people based on race, sex, religion, age, or handicap. He stated he is aware of no activity or conduct in the candidate's background which could be used in any way to subject the candidate to influence, pressure, coercion or compromise. He knew of nothing about the candidate's background which would impact negatively on his character, reputation, judgment or discretion. stated he knew of absolutely nothing unfavorable regarding the candidate and recommended the candidate without reservation for a position of trust and responsibility with the U.S. Government.

WESTVACO Inc., 1 High Ridge Park, Stamford, Connecticut, advised he met the candidate about fifteen years ago. stated the candidate has been instrumental in offering guidance and direction to the company, particularly in the areas of environment, health, and safety. He has known the candidate both professionally and socially and considers the candidate to be a friend.

He considers the candidate to be a person of unimpeachable character. Those who associate with the candidate are well regarded also, according to The candidate enjoys an unblemished reputation and the candidate's loyalty to the United States of America is above question, advised. stated he has never known the candidate to use, buy, sell, distribute or manufacture any illegal narcotic substances or to abuse prescription drugs. He said he consider the candidate to be financially responsible and one who lives within his means. He said he has never known the candidate to harbor any prejudices or biases against people based on race, sex, religion, age, or handicap. He stated he is aware of no activity or conduct in the candidate's background which could be used in any way to subject the candidate to influence, pressure, coercion or compromise. He knew of nothing about the candidate's background which would unfavorable regarding the candidate and recommended the candidate without reservation for a position of trust and responsibility with the U.S. Government.

b6 b7C FD-263 (Rev. 9-8-97)

# FEDERAL BUREAU OF INVESTIGATION

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REPORTING OFFICE	OFFICE OF	ORIGIN	DATE	INVESTIGATIV	E PERIOD	
MIAMI	ADMIN.	SERVICES	04/17/2001	03/23/01	- 04/17/01	<u>i</u>
TITLE OF CASE			REPORT MADE BY			TYPED BY
SAMUEL WRIGHT BODM	AN III				b6	
			IA		ь7с	jr
			CHARACTER OF C	ASE		· · · · · · · · · · · · · · · · · · ·
			LEVEL II-PA	S.		
·				<u> </u>		

# <u>Reference:</u>

Administrative Services EC to Miami dated 03/21/2001.

# Administrative:

Miami indices were negative regarding candidate.

Miami investigation continuing at the Miami Liaison Office.

APPROVED	SPECIAL AGENT IN CHARGE		DO NOT WRIT	E IN SPACES BELO	<b>W</b>
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'FD-204 (Rev. 12-1-95)

### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

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Copy to:

Report of: Date:	b6         b7C         Office:         MIAMI           04/17/2001         04/17/2001         04/17/2001         04/17/2001         04/17/2001	
Case ID #:	161B-HQ-1337020	
Title:	SAMUEL WRIGHT BODMAN III	
Character:	LEVEL II-PAS	
Synopsis:	Criminal inquiries, and United States Attorney's Office checks conducted.	
	Details:	
	The following criminal inquiries were conducted regarding candidate. All met with negative results.	
		56 57C
	On 04/12/2001, United States Attorney's Office, Southern District of Florida, advised there is no federal prosecutive action (civil or criminal) in closed or current files involving the candidate.	

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

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# FEDERAL BUREAU OF INVESTIGATION

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REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGAT	TIVE PERIOD	
HOUSTON	FBIHQ	04/17/200	1 04/16/2	2001	
TITLE OF CASE		REPORT MADE I		.00 <u>T</u>	TYPED BY
SAMUEL WRIGHT BODI	MAN, III			_	1
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		CHARACTER O		ъс ъ7с	
		LEVEL II	-PAS		
<u>- ,</u>					
BUDED:	4/17/2001				
<u>REFERENCES</u> :	FBIHQ EC to Houst	ton, dated	4/9/2001.		
	Pending - (All Hou	uston inves	tigation o	completed) -	
ENCLOSURES:	Enclosed for SIG	BIU are the	following	J :	
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	concerning t	the candida	te's backs	Jround	b6 b7C
investigatio	on.				270
appropriate	<u>IVE</u> : All persons in provisions of the lity have not been	Privacy Ac			of b6
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(Attn: PSS SIGBIU, Room	0.4371)				b/c
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1 - HOUSTON (161	LB-HQ-1337020)				
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FD-204 (Rev. 12-1-95)

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#### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Title:

Report of: Date:	SA 04/17/2001	Office:	HOUSTON	b6 b7С
Case ID #:	161B-HQ-1337020			

Character: LEVEL II - PRESIDENTIAL APPOINTMENT REQUIRING SENATE CONFIRMATION

SAMUEL WRIGHT BODMAN, III

Synopsis: Candidate's directorship of Cabot Oil & Gas was verified and \_\_\_\_\_\_ interviewed with favorable results regarding candidate. Candidate was given stock options which were never exercised over the ten year period.

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DETAILS: All Houston investigation is complete.

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

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161B-HQ-1337020 /MAS

#### **REFERENCE/ASSOCIATE**

The following investigation was conducted by Special Agent on April 16, 2001 at Houston, Texas:

telephone number ; residence unit telephone number advised he has known candidate since the early 1990's. advised that candidate was a director of Cabot Oil & Gas from approximately 12/89 to 12/99. \_\_\_\_\_\_indicated that candidate resigned the position as a director of Cabot Oil & Gas indicated that due to the distance involved between Boston and Houston, other commitments to other businesses, and the time required to attend the director's meetings. stated that he was extremely sorry to see candidate resign. advised that candidate actually started Cabot Oil & Gas as a spin-off of Cabot Corporation in 1989. Candidate was CEO of Cabot Corporation and it would have been automatic for candidate to become a director at Cabot Oil & Gas.

stated that as a director candidate's role was head of the Compensation Committee. Candidate's duties and responsibilities were setting controls and guidelines for management compensation, approving of options and grants, deciding on bonus programs, increasing funds for 401 thrift plans, pension plans, medical insurance as it pertains to compensation, all matters associated to compensation at Cabot Oil & Gas. \_\_\_\_\_\_ advised that Hewitt & Associates provided data on the local industry trends in salary and benefit packages to the committee for help in making decisions on a yearly basis. \_\_\_\_\_\_ advised that no files are kept on directors or board members.

Although occasionally a special board of directors meetings a year. Although occasionally a special board of directors meeting was called, this was infrequent. \_\_\_\_\_\_ advised that candidate was paid in stock options over the ten-year period, but never exercised any of the options. All options have since expired. All of candidate's expenses relating to the Board meetings were also paid by Cabot Oil & Gas.

Indicated candidate was very smart, a graduate of MIT, and had an excellent grasp of what was going on in the industry. \_\_\_\_\_\_\_\_\_\_\_stated candidate could review and analyze the facts and come to a quick conclusion. Candidate would not hesitate to tell the board when something wasn't right, and had a strong involvement with the board. Candidate never let the meetings wander and did so in a diplomatic manner. b6 b7С

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could think of nothing that could be a conflict of interest for candidate in his position.

advised candidate's associates were generally heads of other corporations and all would be considered respectful community leaders. advised that candidate had a good relationship with the other board members, and that all respected his experience in money matters. Another board member that knew candidate well is Candidate did not work with anyone else in Houston.

indicated that there would be no question as to candidate's loyalty to the United States government and indicated he doesn't think the government could find a better person for b6 has no knowledge of any abuse of alcohol or the job. b7C prescription drugs, and indicated candidate would be the last person in the world to use, possess, purchase, sell, manufacture, traffic, produce, transfer, ship, receive, or distribute illegal advised that he has never seen candidate show drugs. any bias or prejudice toward any religion, race, gender or ethnic group and candidate never hesitated to send the best qualified person to do a job and would frequently transfer individuals from one country to another.

advised that candidate definitely lives well within his means and he has never seen candidate be overly indicated he knew of nothing in extravagant. candidate's background that could be used to coerce, influence, pressure or compromise the candidate in any way, or that could have an adverse impact on the candidate's character, judgement, stability, discretion, trustworthiness or responsibility. advised that when candidate became CEO of Cabot Corporation that candidate made many changes and there could be some hard feelings among some of the Cabot family members, but he was certain candidate did nothing wrong. [ did indicate candidate had a very nasty divorce, but believed this was all settled and in the past.

absolutely recommended candidate for a position of trust and responsibility with the United States government. b7C indicated that the United States government is very **TORTUNATE** to have candidate in any position, as candidate is a strong advocate for the United States and an excellent leader.

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Universal File Case Number	42-1337020
Field Office Acquiring Evidence	
Serial # of Originating Document	
Date Received	
From(Name of Contributor)	
Address of Contributor	)
By SA	b6 b7C
To Be Returned Ves Ko Receipt Given Ves Ko Grand Jury Material - Disseminate Only Pursuant Federal Rules of Criminal Procedure Ves Ko Title: Samuel Wright Bod Leve To - PAS	
Reference:(Communication Enclosing Ma	iterial)
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4/16/0r Cast year last December • · · · · · · · ۰ بر Cabot Cil & Sas e se andre de la companya de la comp Sam became CEO Cabot Corp. 1990 - 91 open took co. public 1959 - Went off bard at request. Too much to do, resigned from Doord Alock aptions, fees, Lole - Head of compensation Commiller controls, set quedlines for Mgt. solaries theils lesse approves desapproves raises approven of appeors I ghants Father stock, bours por from inclusing 401 that glow: Change to Wrift, junion preducal all matters relating to selaces Only inside derector; CEO, an gee un mentations Compensation Course: 6 Bd meeting agen, any special Ed. mederings play to Ag prom. Boston,

Layatty - No; couldn & find a better person.

Oud - alistichies

Apuse Achol/drug - no pocial drender NO last person in world to to B/P - NO ' never hesitated to fransfor some one from one country to another. Anus w/ means definitely, at alingent-No lime for Course - Hatteing in background Caballage. some may have some hard feeling, but no unorry daing. Leconment- Absolutely Wish had more Jike hem. A very respected.

us goet very strong advice for a. S. 5 position Good Leader

FD-204 (Rev. 12-1-95)

### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to: Report of: PSS \_\_\_\_\_\_ b6 b7C Office: WFO Date: April 17, 2001 Case ID #: 161B-HQ-1337020 -- 16 Title: SAMUEL WRIGHT BODMAN III

Character: LEVEL II - PAS

Synopsis: White House Office was checked, no record was found. White House Office, Office of the Executive Clerk, was checked and record was reviewed. Department of Justice, Public Integrity Section was checked, no record was located. United States Secret Service was checked, no record was found.

- P (C) -

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WFO 161B-HQ-1337020 PSD:psd <u>1</u>

#### WHITE HOUSE OFFICIAL PERSONNEL FOLDER

Office of Human Resources Management Office of Administration Executive Office of the President Room 4013 New Executive Office Building 725 17th Street, N.W. Washington, D.C.

The following investigation was conducted by b6 Investigative Analyst (IA on March 28, 2001, b7c regarding the appointee, SAMUEL WRIGHT BODMAN, III.

There was no Official Personnel Folder for SAMUEL WRIGHT BODMAN, III at the Office of Human Resources Management.

WFO 161B-HQ-1337020 PSD:psd 1

#### RECORD CHECK

Office of the Executive Clerk Office of Administration Executive Office of the President Room 4 Old Executive Office Building, Washington, D.C.

The following investigation was conducted by b7c Investigative Analyst (IA) on March 28, 2001, regarding the appointee, SAMUEL WRIGHT BODMAN, III.

A search of the index cards and the computer data base records of the Executive Clerk's Office of the White House indicated that SAMUEL W. BODMAN was announced on March 16, 2001 to be Deputy Secretary of Commerce.

No additional information was furnished.

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#### RECORD CHECK

DEPARTMENT OF JUSTICE Public Integrity Section 1400 New York Avenue, Northwest <u>Washington, D.C.</u>

On April 13, 2001, Investigative Analyst (IA) equested the U.S. Department of Justice (DOJ), Criminal Division, Public Integrity Section, Washington, D.C., search its records for all available information concerning SAMUEL WRIGHT BODMAN, III.

On April 6, 2001 Case Management Technician, Public Integrity Section, DOJ, advised IA hat there was no record found regarding SAMUEL WRIGHT BODMAN, III.

WFO 161B-HQ-1337020 CH:ch 1

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## RECORD CHECK

UNITED STATES SECRET SERVICE Investigative Support Division 950 H Street, Northwest Washington, D.C.

On March 27, 2001, Investigative Analyst (IA) requested a search be made of the files at the above agency concerning, SAMUEL WRIGHT BODMAN, III.

On April 3, 2001, Office Manager, advised that no criminal record could be located regarding BODMAN.

b7C

WFO 161B-HQ-1337020 MLP:mlp 1

#### RECORD CHECK

SECURITIES AND EXCHANGE COMMISSION 450 5th Street, Northwest, Washington, D.C.

On April 27, 2001, Investigative Analyst (IA) b6 contacted the Securities and Exchange Commission (SEC), b7c Washington, D.C., in an effort to obtain information regarding any complaints and allegations concerning SAMUEL WRIGHT BODMAN, III, or his affiliated company, Fidelity Investments Corporation, located in Boston, Massachusetts.

On April 30, 2001, \_\_\_\_\_, SEC, b6 advised IA \_\_\_\_\_ that a review of the files disclosed that no b7c identifiable record could be located regarding the candidate or his affiliated company.

No additional information was obtained.

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD	
WFO	BUREAU	4/17/2001	3/27/2001 - 4/13/20	001
TITLE OF CASE		REPORT MADE BY		TYPED BY
SAMUEL WRIGHT BODM	AN III	PSS CHARACTER OF C. LEVEL II -	•	pbr

<u>REFERENCE</u>: BUREAU EC dated 3/21/2001.

- PENDING (COMPLETED) -

ADMINISTRATIVE: BUDED 4/17/2001. b7c It should be noted that this report and all attached investigation was faxed to HQ on 4/17/01, and an e-mail was sent to PSS advising of this fact.

All individuals were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality, both limited and unlimited, have not been granted.

APPROVED TC	co	SPECIAL AGENT IN CHARGE	DO NOT WR	ITE IN SPACES BELOW
COPIES MADE: 2 BUREAU PSS 1 - WFO Q33 <sup>49</sup>	4.17 4.75 4.17	-1337020) -16 EXT 4755		b6 b7C
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FD-263 (Rev. 4-30-85)

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD	
New York TITLE OF CASE	Bureau	04/17/01 REPORT MADE BY	04/9/2001-04/17/2	001 TYPED BY:
SAMUEL WRIGHT BODMAN, III		SA CHARACTER OF CA LEVEL II-PA		

#### **<u>REFERENCE</u>**:

161B-HQ-1337020, Serial 5

-P-

#### ADMINISTRATIVE:

All persons interviewed were furnished the appropriate provisions of the Privacy Act of 1974. No promises of confidentiality were granted.

New York will submit a closed report upon receipt of indices.

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APPROVED SPECIAL AGENT IN CHARGE		DO NOT WRITE IN SPACES BELOW		
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## UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of: Date:	SA April 17, 2001	Office:	New	York	Ь6 Ь7С
Case ID #:	161B-HQ-1337020				
Title:	SAMUEL WRIGHT BODMAN, III				
Character:	LEVEL II - PAS				
Synopsis:	Board Membership verified,	results	set	forth.	
		- P -			

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161B-HQ-1337020 STS:aar

BOARD MEMBERSHIP

#### BOARD OF DIRECTORS Westvaco, Inc. 299 Park Avenue N.Y., N.Y. <u>1987 TO Present</u>

b6 The following investigation was conducted by Special Agent b7C (SA) <u>On April 17, 2001,</u> , Date of Birth Retired Chairman of the Board, Westvaco, Inc., 299 Park **b6** Avenue, N.Y., N.Y., telephone number (212) 688-5000, advised that he has known the appointee (SAMUEL W. BODMAN, III) for b7C approximately forty years having met through business colleagues. They are currently in contact. He described the appointee's character as trustworthy, loyal, sincere and honest with a high level of morals and integrity. He stated that the appointee has a strong mental disposition and is emotionally stable. He maintains confidences, secrets and exercises the appropriate discretion. He gets along well with others and associates with reputable, law abiding people. He is loyal to the United States and has a extremely successful professional reputation and a highly thought of personal reputation. He described his work ability as competent. He presents a professional appearance and has not been known to have any absence or tardiness problems. He has no knowledge of the appointee having ever used any illegal controlled substance; or been involved in the illegal purchase, manufacture, trafficking, production, transfer, shipping, receiving, or sale of any controlled substance or illegal drug. He also had no knowledge of the appointee having ever abused alcohol or prescription medicine. The appointee's lifestyle is consistent with his financial means. The appointee has a stable personality and does not display any form of violent, irrational or deviant behavior. He stated that he has never known the appointee to display any bias or prejudice towards any group or organization. He is unaware of any concealed activity or conduct which could be used in any way to subject the appointee to influence, pressure, coercion or compromise and/or would impact negatively on his character, reputation, judgement or discretion.

stated that the appointee is currently an active voting member on the Board of Trustee's and would therefore be considered in a policy making position. The Board initiates and guides the policy and financial direction of the company. He attends one meeting a month and is compensated both yearly and for monthly meeting attendance. There is no personnel file kept on Board members and there have been no complaints nor derogatory information while the appointee has been on the Board. He stated b6 b7С 161B-HQ-1337020 STS:aar

that he was unaware of any conflict of interest issues involving <sup>b6</sup> the appointee and if one would arise, stated that he believe <sup>b7C</sup> the appointee would recuse himself from that situation.

concluded that he would recommend the appointee for a  $^{b6}_{b7C}$  position of trust and confidence with the United States Government.

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD		
JACKSONVILLE BUREAU		04/18/2001	04/12/2001		
TITLE OF CASE		REPORT MADE BY		TYPED BY	
SAMUEL WRIGHT BODMAN, III		SA		lev	Ъ6 Ъ7С
	•	CHARACTER OF C LEVEL II-PA			

BUDED:

04/17/2001

#### **REFERENCE:**

Bureau EC to Jacksonville and others dated 04/09/2001.

- PENDING (All JK investigation completed) -

#### ADMINISTRATIVE:

All persons interviewed were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted.

Investigation conducted at Tallahassee, Florida, by b6 Special Agent (SA) b7c

Jacksonville General indices negative concerning candidate.

APPROVED TKKK DC SPECIAL AGENT IN CHARGE	DO NOT WRITE IN SPACES BELOW
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For the information of ASD, Jacksonville missed deadline of 04/17/2001 due to other applicant deadlines.

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#### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

 Report of:
 SA

 Date:
 04/18/2001

Office: Jacksonville

b6 b7С

Case ID #: 161B-HQ-1337020

Title: SAMUEL WRIGHT BODMAN, III

Character: LEVEL II - PRESIDENTIAL APPOINTMENT WITH SENATE (PAS)

synopsis: Reference interviewed, candidate's Directorship verified, highly recommended for a position of trust with the U.S. Government.

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**DETAILS**:

Jacksonville investigation is complete.

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161B-HQ-1337020 PS/ps

Jacksonville Division At Tallahassee, Florida

#### **REFERENCE/ASSOCIATES**

T<u>he following invest</u>igation was conducted by Special b6 Agent (SA) b7C On April 12, 2001, Quinque Farm, 9512 Bull Headly Road, Tallahassee, Florida, telephone number (850) 893-5525, advised that he met the candidate approximately twelve years ago through a friend and became involved in real estate b6 ventures with him. advised that he and the candidate b7C became involved in the Security Capital Group, Sante Fe, New Mexico, and the candidate was appointed as the director. confirmed that the candidate held a directorship from December 1990 to the present. advised that as the director, the candidate is responsible for preparation of the staff and organization. The candidate is also chairman of the compensation and nomination committee. believes that the candidate's role as director has been detrimental to the success and stability of the Security Capital Group. Throughout the past twelve years, has become good friends with the candidate and has traveled on vacations with him and his family.

believes the candidate has a high level of professionalism and ethics. He feels that the candidate is a person of the highest character. believes the candidate holds a reputation of a brilliant man with tremendous morals. has no reason to question the candidate's loyalty to the United States. He believes the candidate associates himself with other very bright and successful people. The candidate does not have any biases or prejudices that knows of. believes that the candidate lives within his financial means. He has never seen the candidate abuse alcohol or prescription drugs. does not believe the candidate has ever used, purchased, possessed, manufactured, or sold illegal drugs. is not aware of any conduct that could be used to influence, pressure, coerce, or compromise him in any way. He is also not aware of any conduct that could have an adverse impact on his character, reputation, judgment, stability, discretion, trustworthiness, responsibility, loyalty to the United States, or have a bearing on his access to classified information. highly recommends the candidate for a position of trust and responsibility with the U.S. Government.

b6 b7С 161B-HQ-1337020 MJH:mme

**REFERENCE INTERVIEW:** 

who resides at was interviewed regarding presidential appointee Samuel Wright Bodman, III. , who was born advised that she has known the appointee for over forty years having worked with him through her first husband. Throughout the past forty years, **b**6 b7C has maintained a close social contact with the appointee and advised that he has always been a friend. described the appointee's character as "outstanding, outgoing and friendly." She stated that he tends to associate with successful business people, both male and female, and that he has many close friends in both Texas, and the Boston, Massachusetts area. He has the reputation of being "well liked by everybody" and has friends all over the world. He relies heavily on his friends and trusts his friends to provide him with accurate information when he needs it. further stated that the appointee is "extremely loyal and trustworthy" and there is no reason known by to indicate that there is anything in the appointee's background which would subject him to being compromised should he obtain a position in the United States government. Appointee is advised she has never seen him a social drinker, and overindulge. She has never known the appointee to abuse prescription drugs, or use any illegal drugs. The appointee lives well within his financial means, owning a condominium in Boston, a house in the Vineyard area of Massachusetts, and a house in Palm Beach, Florida. He is an individual who has made believes that appointee his successes in private business. will be a positive influence within the Department of Commerce.

Appointee possesses no biases toward anyone based upon race, sex, religion, sexual preference, or any other area of concern.

Regarding the appointee serving as a trustee on the French Library and Cultural Center, advised that she, along with Samuel Bodman, served as trustees for the library from approximately 1983 until 1990. The French Library and Cultural Center is a non-profit organization located at 53 Marlboro Street, Boston, Massachusetts which promotes French language and culture in the United States. The library teaches French classes and puts on shows depicting French heritage.

Appointee Bodman was named as a trustee based upon his relationship with the founder of the French Library and Cultural Center, General George Doriot (deceased). Appointee met Doriot

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when he was employed at the American Research and Development Corporation. At that time, Doriot was an executive within that corporation. As one of twelve trustees for the French Library and Cultural Center, appointee's role was to, with other trustees, make recommendations regarding program curriculum and budget issues to the executive director and chairman of the board. As trustees, they did not make any decisions for the French Library and Cultural Center, to include policy matters, for the center. They merely made recommendations to the Executive Director and Chairman of the Board for consideration. Appointee's role did include providing advice on budget issues and investments made by the library. This was in part because of his previous association with Fidelity Investments. Trustees received no compensation from the library for their time, and in fact, trustees often donated money to the non-profit organization. They had no policy making role in library activities.

advised that the candidate is a wellrespected individual who will be a great asset to the United b7c States government. She highly recommended him for a position of trust and confidence within the United States government. (Rev. 10-01-1999)

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## FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY	Date: 04/18/2001
To: Administrative Services At	tn: Special Inquiry & General Background Investigations Unit (SIGBIU), Rm. 4371; PSS b6 b7c
From: Miami PB-2/PBCRA Contact: SA	
Approved By:	Ъ6 Ъ7С
Drafted By:	
Case ID #: 161B-HQ-1337020 (Pendi	.ng)
Title: SAMUEL WRIGHT BODMAN, III LEVEL II-PAS	
Synopsis: intervie as a trustee of the French Library Massachusetts.	ewed regarding candidate's role b6 and Cultural Center, Boston, b7c
Reference: 161-B-HQ-1337020 Serial	. 7.
Administrative: Buded is 04/17/200	1.
Details: Enclosed for SIGBIU is an reflecting interview of West Palm Beach Resident Agency. candidate Bodman for position with	by the Miami Division, ь7с highly recommends
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(12/31/1995)

# FEDERAL BUREAU OF INVESTIGATION

<b>Precedence:</b> DEADLINE 04/17/2001 (PAST) Date: 04/26/2001							
To: Cincinnati							
From: Administrative Services Special Inquiry and General Background Investigations Unit (SIGBIU), Room 4371 Contact: PSS, Extension 4755							
Approved By: b6 b7C							
Drafted By: bgk							
<b>Case ID #:</b> 161B-HQ-1337020 (Pending)							
Title: SAMUEL WRIGHT BODMAN, III. LEVEL II-PAS							
Synopsis: Agency Checks							
Administrative: BUDED was 04/17/01 (PAST).							
<b>Details:</b> Results of a search through DCII records revealed that Mr. Bodman was granted a clearance on 7/27/2000 by the Defense Industrial Security Clearance Office (DISCO).							
Set Lead 1:							
CINCINNATI							
AT CINCINNATI, OH							
Review records at DISCO.							
CC: 1 - PSS							
161B-HQ-1337020-21							

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# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PE	RIOD	
CINCINNATI	FBIHQ	04/26/2001	04/26/2001		
TITLE OF CASE		REPORT MADE BY	REPORT MADE BY		
SAMUEL WRIGHT BODMAN, III		IA		b6 b7С	pag
		CHARACTER OF C	ASE		
		LEVEL II-PA	S		

BUDED:

04/17/2001 (PAST)

#### **<u>REFERENCE</u>**:

ASD EC to CI dated 04/26/2001.

- PENDING (All CI investigation completed) -

#### ADMINISTRATIVE:

All persons interviewed were provided with the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted.

A check of Cincinnati electronic and manual indices was negative regarding the candidate.

APPROVED	SPECIAL AGENT IN CHARGE	DO NOT WRITE IN SPACES BELOW					
(Attn: PSS SIGBIU, RC 1-CINCINNATI 93349 4-			ь6 ь7с ДДД				
	CORD OF ATTACHED REPORT	Notations	Tis EC:				
Agency Request Recd.		-					
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#### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

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Copy to:		
Report of: Date:	IA Office: CINCINNATI b6 04/26/2001 b7	3
Case ID #:	161B-HQ-1337020	
Title:	SAMUEL WRIGHT BODMAN, III	
Character:	LEVEL II-PRESIDENTIAL APPOINTMENT WITH SENATE CONFIRMATION	

Synopsis: Results of DISCO check set forth.

- P -

#### **DETAILS**:

Cincinnati investigation is complete.

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

161B-HQ-1337020 PAG:pag

#### OTHER AGENCY CHECKS

Defense Industrial Security Clearance Office 2780 Airport Drive Columbus, Ohio

The following investigation was conducted by Investigative Analyst \_\_\_\_\_ b6 b7c

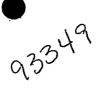
On April 26, 2001, Defense Industrial Security Clearance Office (DISCO), 2780 Airport Drive, Columbus, Ohio, advised that SAMUEL WRIGHT BODMAN, III, had the following security clearances:

Top Secret clearance based on a Background Investigation conducted by the Defense Investigative Service (DIS) dated October 22, 1993. This clearance was terminated on December 18, 1996, and the employing agency was Mitre Corporation, 202 Burlington Road, Bedford, Massachusetts.

Top Secret clearance based on a Background Investigation conducted by DIS dated October 22, 1993. This clearance was terminated on July 27, 2000, and the employing agency was the Massachusetts Institute of Technology (MIT), 77 Massachusetts Avenue, Building E19-750, Office of Sponsored Programs, Cambridge, Massachusetts.

advised that she could not determine through her computer database when either clearance was issued. She advised that if additional information is needed or if the Background Investigation file is needed that contact should be made with the Personnel Investigations Center at the Defense Security Services Operations Center in Baltimore, Maryland.

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U.S. Department of Justice

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Federal Bureau of Investigation

Washington, D. C. 20535-0001

MAY 2 2 2001

BY COURIER

Honorable Alberto R. Gonzales Counsel to the President The White House Washington, D.C.

Dear Mr. Gonzales:

Based on a request received from your office dated March 14, 2001, a Level II background investigation was initiated concerning Mr. Samuel Wright Bodman III. Enclosed is a summary memorandum containing the partial results of this investigation, along with copies of two interviews providing details of information contained in this summary memorandum.

Two background investigations have been conducted concerning Mr. Bodman by the Defense Security Service, the most recent having been completed in 1993. Pertinent portions of those investigations are incorporated in this summary memorandum.

The names and identifying data have been excised from enclosed interviews in order to protect their identities in the event there is a need to interview them in the future and they request confidentiality. No change is made to the substance of the interviews.

Your office will be advised when additional investigation has been completed. Should you have any questions, they may be directed to Supervisory Personnel Security Specialist **b6** at telephone (SPSS) or SPSS b7C number 16 B-H0-1331020-23 OK MINTER MAR Sincerely yours, ′ь6 Dep. Dir Chief of Staff Off. of Gen. Counsel Asst. Di Admin.Ser Chief Crim. Inv Special Inquiry and General CJIS Financ Background Investigations whit Info, Res Enclosures (4) Dissem. on: National Sec. BGK ìk Reg. Rec'd: Off. of Public PARTIAL 1×C to USSS Arms Reach Program 10/22/01 Nr 10/9/2001 4/201-10-& Cong. Äffs. Return to Ms. Off. of EEO/ MAIL ROOM Director's Office 4/Eads/Ma

# Honorable Alberto R. Gonzales

NOTE: This case was opened on 3/21/01. Mr. Bodman is currently employed by the Cabot Corporation, Boston, Massachusetts, as the Chairman and Chief Executive Officer. He is being investigated for a Presidential appointment as the deputy secretary of the Department of Commerce, which requires Senate confirmation.

Investigation revealed that, in the divorce records Mr. Bodman's former spouse alleged that Mr. Bodman was verbally abusive toward her, involved in a romantic affair, and physically abusive to her on one occasion. Mr. Bodman advised that he attended marital counseling. Mr. Bodman advised that his contact with foreign government officials was ceremonial or for negotiation or oversight of interests of Cabot Corporation.

	a colleague, stated that Mr. Bod	lman was
consumed by his wealt	ch. T-1 alleged	

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Podmon word	T-2 stated that Mr.	
Bodman was		<b>,</b>

Investigation is complete, except additional reference interviews regarding allegation (KS,RH and NY), review sexual harassment suit and recontact Mr. Bodman (BS).

Sent to the White House: interview of Samuel Wright Bodman, from BS dated 4/12/01.

BS T-1- N.		b6
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		עום
BS T-2- Massachusetts, from BS dated 4/24/01	Boston,	

Names excised in BS T-2 intervi	.ew dated 4/24/01:
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**U.S. Department of Justice** 



Federal Bureau of Investigation

Washington, D. C. 20535-0001

# MAY 2 2 2001

#### SAMUEL WRIGHT BODMAN III

This summary memorandum contains the partial results of a Level II background investigation concerning Mr. Bodman, which addressed the past fifteen years of his life. Inquiries were conducted in the United States as to Mr. Bodman's character, loyalty, and general standing, but no inquiries were made as to the sources of his income.

Additional investigation is being conducted.

#### Birth

Mr. Bodman was born on November 26, 1938, in Chicago, Illinois.

#### Education

Mr. Bodman received a Doctorate of Science degree from the Massachusetts Institute of Technology (MIT), Cambridge, Massachusetts, in June, 1965.

#### Military Service

Mr. Bodman has indicated no prior military service.

#### Employment

From March, 1986, to December, 1986, Mr. Bodman continued to be employed by Fidelity Investments, Boston, Massachusetts, as the President and Chief Operating Officer.

Since January, 1987, Mr. Bodman has been employed at the Cabot Corporation, a global special chemical and material company, Boston, Massachusetts, as the Chairman and Chief Executive Officer (CEO).

Chief of Staff Off. of Gen. In addition to the above employment, Mr. Bodman also Counsel - serves on the Board of Directors for Westvaco Incorporated, Asst. Dir. Admin.Ser. Stamford, Connecticut; Cabot Micro Electronics Corporation, Crim. Inv.\_\_\_\_ Aurora, Illinois; Cabot Oil and Gas Corporation, Houston, Texas; CJIS Info Res\_ and Security Capital Group, Incorporated, Santa Fe, New Mexico; Insp\_\_\_\_ -and is a trustee of the French Library and Cultural Center, National Sec\_ Boston, Massachusetts.

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Dep. Dir

OPR\_\_\_\_\_\_ Off. of Public & Cong. Affs.\_\_\_ Training

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Family Status

	Mr. H	Bodma	n is	mar	ri	led to					has	
indicated	that	his	wife	is	а	United	States	cit	izen '	<u> Phev</u>	and	hig
stepchild,	,						<b>reside</b>	e at				
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Mr. Bodman's parents, Lina Lindsey Bodman and Samuel Wright Bodman, Jr., and his first wife, Elizabeth L. Bodman, are deceased. In addition to his wife and stepchild, Mr. Bodman has listed the following living close relatives:

Child	
Child	Ь6 Ь7С
Child	
Stepchild	
Brother	

Records of the Suffolk County Probate and Family Court, Boston, Massachusetts, disclosed that on April 29, 1997, Mr. Bodman, plaintiff, and Lynda A. Schubert Bodman, defendant, were granted a divorce nisi for the cause of irretrievable breakdown of marital bond.

Further review of those court records indicated that alleged that Mr. Bodman was verbally abusive toward her and that he was involved in a romantic affair with another woman. The records also contained information provided by \_\_\_\_\_\_ concerning one incident of alleged physical abuse on the part of Mr. Bodman. In the records, Mr. Bodman alleged that \_\_\_\_\_\_ was set in her ways and her manner and commitment to ner WORK. The relationship between Mr. Bodman's three children from his first marriage and \_\_\_\_\_\_ was that of tolerance that evolved into conflict during which \_\_\_\_\_\_ allegedly struck one of his children during the first year of marriage. Additional investigation concerning this matter is pending.

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#### Interviews

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Executive Secretary, Cabot Corporation, Boston, Massachusetts, advised that she was an executive secretary for four years and then for two years she was Mr. Bodman's executive secretary at Cabot Corporation, Boston, She advised that in October, 2000, she stopped Massachusetts. working for him to work with the person who is scheduled to be the next CEO. stated that she and Mr. Bodman were like oil and water in terms of personal style and individual sense of humor, but she had the highest regard for him. She stated that he treated her with respect and their relationship became much warmer as Mr. Bodman continued to be more sensitive to others. advised that they are different politically. She advised that she was buying a house and Mr. Bodman asked her if she was paying cash or going through a bank. When she stated that she was going through a bank, Mr. Bodman responded that the only problem with going through a bank was that she would have to pay interest. stated she was unaware as to how he could believe that middle class people could buy a house with cash and assumed his wealth left him somewhat out of touch. escribed Mr. Bodman as a highly scrupulous individual and with great integrity and recommended him for a position of trust with the United States government.

AN INDIVIDUAL, WHO REQUESTED THAT HIS/HER IDENTITY BE PROTECTED FROM ANYONE OUTSIDE THE FBI,

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He/She stated that Mr. Bodman has

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Three other individuals, all of whom work with Mr. Bodman, advised they were also aware of the situation in India. They advised that Mr. Bodman chooses personnel based on the perception of how a country works and that his selection of the individual in India was based on the politics of the region. One individual stated that when Mr. Bodman later disassociated himself from the individual it showed he was able to accept criticism for his choices. Another said Mr. Bodman made every effort to be fair in the India situation but that he does not put up with or tolerate discrimination. Another said Mr. Bodman pushes the envelope in asking their foreign interests to maintain a policy of non-discrimination despite the customs of the local culture.

Four individuals advised that during the course of Mr. Bodman's divorce from made many public allegations against Mr. Bodman that concerned his behavior in both his professional and personal lives. One individual stated that alleged he misused Cabot funds and Cabot business arrangements to his own advantage and was aware that the Cabot board hired a retired judge to independently investigate her allegations as they related to Cabot and believed the investigator found nothing improper. of the Cabot Board of Directors Audit Committee, stated that the suggestion to hire an independent investigator came from Mr. Bodman himself and, further, that Mr. Bodman requested the Board to interview his wife. tated that refused to be interviewed. also on the Board of Directors, also stated that Mr. Bodman urged the Board to hire allegations the investigator. He said that all of disappeared under scrutiny. All four of these individuals recommended Mr. Bodman for the position of trust and responsibility.

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IDENTITY	BE	PROTECTED	FROM	ANYONE	OUTSIDE	THE	FBI,	state	d that	al
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Twenty-six additional persons, consisting of current and former supervisors and colleagues, present and former neighbors, references, professional associates, and social acquaintances, were interviewed. They provided favorable comments concerning Mr. Bodman's character, associates, reputation, and loyalty.

All persons interviewed during the course of this background investigation, with the exception of one individual as indicated above, stated they are unaware of alcohol abuse. Each person stated they are unaware of any illegal drug use or prescription drug abuse by Mr. Bodman, nor have they ever known his to exhibit any type of bias or prejudice against any class of citizen or any type of religious, racial or ethnic group. They also commented that they believe Mr. Bodman lives within his financial means. None of the individuals contacted was aware of any information concerning Mr. Bodman that could be used to compromise or coerce him. All persons interviewed with the exception of an individual recommended him for a position of trust and responsibility.

Among those interviewed are the following:

Additional investigation remains outstanding concerning some of the information provided above.

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Financial Responsibility

A search of computerized credit records, which was conducted at FBI Headquarters in March, 2001, disclosed no pertinent information concerning Mr. Bodman.

#### Law Enforcement Agency Checks

Information has been received from appropriate law enforcement agencies indicating their files contain no pertinent information concerning Mr. Bodman.

#### <u>Miscellaneous</u>

A search of NEXIS, a computerized news retrieval service, disclosed no pertinent information concerning Mr. Bodman.

A search of LEXIS, a computerized public records retrieval service, concerning criminal and civil litigation, disclosed no pertinent information concerning Mr. Bodman.

A check of the records of Choicepoint, a public source legal archives and news database, conducted at FBI Headquarters, revealed no pertinent information concerning Mr. Bodman.

During a routine interview with the FBI on April 12, 2001, Mr. Bodman advised that his contact with foreign government officials was ceremonial or for negotiation or oversight of interest for Cabot. Mr. Bodman stated he could not recall any names accept for the mayor of Shanghai, who is now the Premier of the People Republic of China. Mr. Bodman stated all other travel was related to Cabot's business or pleasure. Mr. Bodman stated he could not recall the foreign nationals and he did not travel alone with foreign nationals and at no time was he ever approached by a foreign national. Mr. Bodman advised he has never asked to meet with any foreign national or official in which there was not relevant business issue to discussed or meeting related to his agenda. Mr. Bodman advised has a company for which he traveled aboard in Asia.

Mr. Bodman stated he has never received any type of counseling, psychological or psychiatric treatment except for marital counseling. (Due to the nature of the counseling, no additional investigation was conducted concerning it.)

Mr. Bodman stated he has never abused controlled substances, prescription drugs or alcohol, nor been in rehabilitation for alcohol or prescription drugs. b6 b7С

#### Agency Checks

Mr. Bodman was the subject of two background investigations conducted by the Defense Security Service (DSS), the most recent having been in 1993. Pertinent portions of those investigations are incorporated in this summary memorandum. During the course of those investigations, fourteen individuals were interviewed and provided favorable information concerning Mr. Bodman.

In the 1993 DSS background investigation, Mr. Bodman stated that all his foreign travel was in his official capacity as a Representative of a Foreign Interest (RFI) while employed as the CEO and Chairman of the board at Cabot Corporation and executive committee member at MIT. Mr. Bodman stated that his duties as a RFI included evaluating business performance, encouraging growth and investment and recommending/making management changes. His compensation for RFI duties was included in his salary from Cabot Corporation. Mr. Bodman stated that he does not have any personal financial investment/ownership in foreign entities.

A check of the records of the Defense Industrial Security Clearance Office, Cincinnati, Ohio, disclosed that Mr. Bodman was granted a top security clearance on October 22, 1993 based on his DSS 1993 background investigation. His clearance was terminated on July 27, 2000.

During the course of this background investigation, the records of the following entities were checked and found to contain either no record or no pertinent information concerning Mr. Bodman, unless otherwise noted in this summary memorandum:

> Defense Clearance and Investigations Index; Central Intelligence Agency; Office of Personnel Management; Public Integrity Section and appropriate United States Attorneys, Department of Justice; United States Secret Service; and the White House Office.

Searches of the various indices of the FBI, including but not limited to the central index maintained at FBI Headquarters, the index of the Criminal Justice Information Services Division (Mr. Bodman by fingerprints and other known identifying data; Mr. Bodman's close relatives by name and other known identifying data only), the indices of appropriate field

offices and other appropriate computer data bases, did not identify any documents that contain pertinent information identifiable with Mr. Bodman or his close relatives.

It should be noted that results of the above indices searches reveal only data entered into those indices as of the date each was searched. However, it should also be noted that some delays may occur as to the entry of such data. FD-302 (Rev. 10-6-95)

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#### FEDERAL BUREAU OF INVESTIGATION

- 1 -

Date of transcription

4/17/01

SAMUEL WRIGHT BODMAN III, date of birth: 11/26/38 place of birth: Chicago Il, residence: 40 Battery St., 612, Boston MA 02109 telephone: (617)367-3940, was advised of the official identity of the interviewing Agent and the purpose of the interview that being to ensure that complete, accurate, and current information is available and obtained concerning suitability and security issues pertaining to the Special Agent position with the FEDERAL BUREAU OF INVESTIGATION (FBI), for which the applicant is being considered. BODMAN was advised that candor and forthrightness during the application process are significant factors in consideration for FBI employment. BODMAN thereafter provided the following information:

BODMAN was shown a copy of the Application for Employment, SF-86 (and supplemental pages) dated, which he had completed and signed. Each of APPLICANT's answers to the questions on the SF-86 was reviewed with him to ensure accuracy and completeness. BODMAN advised that the written responses to each of the questions on the SF-86 were accurate and complete to the best of his knowledge and recollection with the following exceptions:

BODMAN and his immediate family (spouse, parents, brothers, sisters, children, and current cohabitants) are United States citizens by birth.

BODMAN has never been the subject of any professional complaints or non-judicial disciplinary action taken against him by any individual, group or organization, i.e., Bar Association grievances, Better Business Bureau complaints, student, military disciplinary proceedings, Equal Employment Opportunity complaints, Office of Professional Responsibility inquiries, or a sexual harassment type complaint.

BODMAN has never been self-employed, never provided any services to a foreign country, any foreign national, or a representative of any foreign interest.

BODMAN has never engaged in analysis, discussion, or

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by <u>SA</u>			aes				b7C

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publication of material on intelligence, defense, foreign affairs, or protected technology.

BODMAN has never been denied employment for unfavorable reasons, dismissed from any employment, left any employment under unfavorable circumstances, or been denied a security clearance by any agency of the Federal Government.

BODMAN has traveled outside the United States as listed on the SF-86. BODMAN advised that his contact with foreign government officials was either ceremonial, such as the opening of new plant for Cabot or related directly to Cabot's negotiations or oversight of its interests. BODMAN does not remember any of the names of those he met accept for ZHU Rongji, who was then the mayor of Shanghai and is now the Premier of the Peoples Republic of China. BODMAN first met him because the mayor of the city under the communist system functioned like the CEO for any business venture. One of the industrial ministers there functioned as the partner.

In India (1994) the meetings were with various members of their Commerce Department whose names BODMAN does not recall to discuss discontinuity on tariffs because it was cheaper to import than to manufacture domestically which made no sense in terms of India's own interest and in terms of Cabot's interest to manufacture there.

In Hong Kong (1991 and 2000) Cabot has a long term lease and the lessor is a Public Agency. As the landlord (lessor) Hong Kong could name positions necessitation discussions with Cabot.

In Indonesia (1995) there were start up negotiations with the Minister of Industry and Trade in Suharto's government who was Ariwoboa (sp?). BODMAN was not sure of the spelling but advised that in Indonesia people have only one name, here are no first names or last names. The plant was in the western tip of Java where there was no other place to buy fuel but one company that had the monopoly. In additions, there was dumping ( as in selling for artificially low prices) of products from Asia and Cabot wished for a reasonable anti dumping policy. FD-302# (Rev. 10-6-95)

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Prior to BODMAN's arrival at Cabot there was a problem in Algeria with the Sonatracht Oil and Gas Company. Cabot had defaulted and the company was in bankruptcy. The case was being heard in Boston. Cabot was negotiating a settlement and trying to rebuild is commercial relationship with Algeria.

The ceremonial functions were included contacts with the Minister of Trade in Victoria Australia, a member of Parliament and the Prime Minister. Nigerian Officials came for the purchase of a Liquid Natural Gas company because the company was nationalized.

Other ceremonial functions included meetings in the Czech Republic, Wales in the United Kingdom, Trinidad and Tobago and France. The specific government officials were not recalled, nor were any details beyond what was listed in the SF 86.

All other travel was directly related to Cabot's business of for pleasure. BODMAN did not recall by name the foreign nationals with whom he has met over the years. BODMAN advised that he did not travel alone with foreign nationals. There were other Americans present and at no time was e ever approached by a foreign national in a way that seemed out of context. BODMAN could remember no instances of being asked to provide information outside the direct scope of his business to include public source information. No foreign national ever tried to pressure him, instruct him or contact him inappropriately abroad or domestically. BODMAN did not see any indication that he was being assessed by an intelligence interest. BODMAN has never acted as an agent for a foreign government. BODMAN was never asked to meet with any foreign official or national in which there was not a relevant business issue to be discussed or where the meeting seemed to have no immediately apparent purpose related to BODMAN's own agenda.

BODMAN advised that has a company for which he has traveled abroad on business in Asia. BODMAN does not know any details.

BODMAN has no family or close personal friends residing in foreign countries.

BODMAN has not been directed by any foreign country

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representative to obtain a position with U.S. Government.

BODMAN does not exercise dual citizenship, possess and/or use a foreign passport. BODMAN does not have a residence in a foreign country, have a substantial financial interest in another country or in any foreign owned or operated business that could make him vulnerable to foreign influence. This would exclide that fact that he owned Cabot stock and Cabot has interests abroad. BODMAN advsed that all his stocks are being converted so that he will have no such interests. BODMAN owns a vacation home the Bahamas.

BODMAN does not share living quarters with a person of foreign citizenship.

BODMAN has not held political office in a foreign country or voted in foreign elections.

BODMAN has not been involved in any organization which advocates the use of force to overthrow the United States Government or any involvement in the commission of sabotage, espionage or in the assistance of others in terrorism acts.

BODMAN does not have any membership in organizations whose policies restrict membership on the basis of sex, race, color, religion, or national origin, or any other class.

BODMAN has never been a plaintiff or defendant in any civil suits excluding his divorce.

BODMAN has never been involved in any criminal matter as a suspect or subject, nor has he ever been arrested for, charged with, or convicted of any criminal offense. BODMAN has not been directed by any criminal element to obtain a position with the FBI or U. S. Government.

BODMAN has never associated with persons involved in criminal activity.

BODMAN has never had any financial problems which resulted in, but not limited to, property being repossessed, debts placed for collection, been the subject of a tax lien, had a legal judgement rendered concerning a debt, filed for :. 161B-HQ-1337020

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bankruptcy, had any student loans in default.

BODMAN has never had any financial problems that are linked to gambling, drug abuse, alcoholism, embezzlement, employee theft, check fraud, income tax evasion, or expense account fraud.

BODMAN is current on all federal, state, and local tax obligations, nor has he ever made a back payment of any such tax. This includes, but is not limited to, income taxes, Medicare taxes, Social Security taxes and unemployment taxes, i.e., paid for any domestic help.

BODMAN has never had any unexplained affluence or had a history of not meeting his financial obligations.

BODMAN has never had any delinquent credit accounts or has he ever had any credit accounts that were 120 days delinquent.

BODMAN has never been involved in any business or investment circumstances that could involve or has involved conflict of interest allegations.

BODMAN has never been licensed to practice law, accountancy, teaching, real estate, or health care in any state.

BODMAN has never had a relative or an associate that has recently or in the past been involved in misconduct.

BODMAN has never used illegal drugs or been in any rehabilitation programs for illegal drug use. BODMAN has never abused controlled substances, prescription drugs or alcohol, nor been in rehabilitation for alcohol or prescription drugs. BODMAN has never been involved in any part of the illegal drug trade.

BODMAN has never had any prescription drug or alcohol related incidents such as driving under the influence, fighting, child or spousal abuse.

BODMAN has never received any type of counseling, psychological or psychiatric treatment except for marital counseling. FD-302a (Rev. 10-6-95)

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BODMAN does not harbor any biases or prejudices regarding the sex, race, religion, or national origin of any person or organization.

BODMAN is not concealing any activity or conduct that could be used to influence, pressure, coerce, or compromise him in any way, or that could have an adverse impact on his character, judgement, stability, discretion, trustworthiness or responsibility.

BODMAN is not aware of any current or past circumstances that could have a bearing on his suitability for federal employment and/or access to classified information.

BODMAN advised his oral responses to the above questions are true and correct to the best of his knowledge and recollection. BODMAN is unaware of anything that could, would, or should prevent him from receiving a position with the U.S. Government. FEDERAL BUREAU OF INVESTIGATION

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Date of transcription  $\frac{4}{1}$ 

4/16/01

BS T-1, who requested that BS T-1's identity be protected from anyone outside the FBL. This information is one of several employee interviews. Since the candidate knows which employees were interviewed, and since none of the others requested confidentiality, release of those interviews would allow the candidate to identify that this interview was being withheld and to know who had given negative information. The person requesting confidentiality would thus be identified by process of elimination and would be damaged professionally. BS T-1 advised as follows:

BS T-1 is aware that	b6
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BS T-1 was	- b7D
informed of the identity of the interviewing Agent and of the	
purpose of the interview, that being to obtain complete	

purpose of the interview, that being to obtain complete information on BODMAN who is being considered for a Presidential Appointment.

BS T-1 would describe BODMAN as a very bright, personable individual, who is very easy to talk to. BODMAN listens to a variety of ideas and is open to other approaches. He reacts well to stress but will start to close down a little more and be less receptive to knew ideas.

BS T-1 stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.

BS T-1 stated that BODMAN's reputation in the community is very good.

BS T-1 stated that BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any

Investigation on 4/14/01	AC BOSTON, MAS	SACHUSETTS	
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by <u>SA</u>	aa		b6 b70
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As far as BS T-1 knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

BS T-1 strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. BS T-1 advised that the answers to the above questions were true and complete to the best of his/her knowledge. APR-27-2001 13:57

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FD-302 (Rev. 10-6-95)

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#### FEDERAL BUREAU OF INVESTIGATION

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SOURCE, HEREAFTER BS T-2, ADVISED THAT HE/SHE WISHED HIS/HER IDENTITY CONCEALED FROM EVERYONE OUTSIDE OF THE FBI.

BS T-2 was interviewed in the presence of his/her

Investigation on 4/24/01 at Boston, MA File # 161B-HQ-1337020 Date dictated 2/25/01

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Special Agent

by

(12/31/1995)

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# FEDERAL BUREAU OF INVESTIGATION

<b>Precedence:</b> DEADLINE 04/17/2001 (PAST) <b>Date:</b> 05/23/2001
To: Boston Kansas City New York Richmond
From: Administrative Services Special Inquiry and General Background Investigations Unit (SIGBIU), Room 4371 Contact: PSS Extension 4755
Approved By: b6 b7C
Drafted By:
Case ID #: 161B-HQ-1337020 (Pending)
Title: SAMUEL WRIGHT BODMAN, III LEVEL II-PAS
Synopsis: Additional background investigation (BI) on captioned candidate.
Administrative: BUDED is PAST. Submit results by COB 5/29/2001.
Direct results/questions to PSS SIGBIU, b6 FBIHQ, Room 4371, Ext. 4755.
<b>Enclosure:</b> Copy of BT-2 FD-302 dated 4/24/01 (Offices are requested to use caution in the handling/storing of this FD 302).
Details: Captioned candidate Samuel Wright Bodman III is being considered for a Presidential Appointment which requires Senate confirmation, was born 11/26/1938 in Chicago. Illinois, SS# 329- 32-7756, currently employed at Cabot Corporation, Boston, Massachusetts, as Chairman and Chief Executive Officer. During the course of this investigation several individuals stated that during Mr. Bodman's divorce from alleged that Mr. Bodman misused Cabot funds and made business arrangements through Cabot Corporation for his own advantage. The chairman of Cabot Board of Directors hired an independent investigator to investigate Mr. Bodman's former spouse's allegations related to Cabot. An individual stated that a sexual harassment suit was filed against Mr. Bodman with the Massachusetts Commission Against Discrimination.
LEAD(s):

161B-HQ-1337020-24

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Set Lead 1:

BOSTON

AT BOSTON, MA

Interview General Counsel at Cabot regarding the discrimination suit and determine if Mr. Bodman has been named in any other complaints with Cabot. Obtain details and review records.

Set Lead 2:

KANSAS CITY

AT KANSAS CITY, KS

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Set Lead 3:

NEW YORK

AT NEW YORK, NY

Conduct regular applicant-type interview of Harold R. Tyler, Jr. in addition to discussing his findings at Cabot. (He was the independent investigator who investigated the allegation regarding Mr. Bodman misused Cabot funds, Mr. Bodman invested with another individual who formed the Bank of Credit and Commerce International.)

Set Lead 4:

RICHMOND

#### AT RICHMOND, VA

Conduct regular applicant-type interview of Howard Blauvelt, 1410 Piper Way, Keswick, Virginia, telephone #804-979-1997 in addition to addressing improprieties. Mr. Blauvelt's name was provided as a person who could speak on the allegations of improprieties by Mr. Bodman misused Cabot funds, Mr. Bodman invested with another individual who formed the Bank of Credit and Commerce International and Cabot paying 71 million dollars to a company but only the company received 50 million dollars.



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FD-302 (Rev. 10-6-95)

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#### FEDERAL BUREAU OF INVESTIGATION

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#### SOURCE, HEREAFTER BS T-2, ADVISED THAT HE/SHE WISHED HIS/HER IDENTITY CONCEALED FROM EVERYONE OUTSIDE OF THE FBI.

BS T-2 was interviewed in the presence of his/her

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FD-263 (Rev. 4-30-85)

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD	
Kansas City	Bureau	05/31/01	05/31/01	
TITLE OF CASE		REPORT MADE BY		TYPED BY:
SAMUEL WRIGHT B	ODMAN, III	Staffing A	sst	tmg b6
		CHARACTER OF	CASE	
		LEVEL II -	PAS	

### Reference:

Bureau EC to Boston, et al, dated 05/23/01.

- P -

### Administrative:

"All persons interviewed were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted."

Kansas City ACS and general indices negative regarding candidate. All leads covered at Kansas City.

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FD-204 (Rev. 12-1-95)

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#### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of: Date:	Staffing Asst Office: Kansas City May 31, 2001	b6 b7С
Case ID #:	161B-HQ-1337020	
Title:	SAMUEL WRIGHT BODMAN, III	
Character:	LEVEL II - PRESIDENTIAL APPOINTMENT WITH SENATE CONFIRMATION	

Synopsis: Reference interviewed and recommended.

- P -

**DETAILS**:

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161B-HQ-1337020 RAR:tmg

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The following investigation was conducted by Special Agent (SA) at Topeka, Kansas on May 31, 2001:	b6 b7С
REFERENCE:	
Payless Shoesource Corporation, 3231 Southeast 6th Street, Topeka, Kansas, telephone (785) 233-5171, was advised of the official and personal identity of the interviewing agent and the purpose of the interview. The "Privacy Act" statement was provided to confidentiality were also furnished to and none were requested.	Ъ6 Ъ7С
stated he was the for the Cabot Corporation in Boston, Massachusetts from 1991 to mid 1993. The candidate, Samuel Bodman, was the CEO/Chairman of Cabot Corporation during that time. was a General Counsel for a bank in Phoenix, Arizona prior to being employed by Cabot Corporation. After leaving, went to Bank IV and then with Payless, where he has been employed for the past five years. stated the candidate was one of many people that interviewed him for Cabot Corporation.	Ъ6 Ъ7С
stated that the candidate was a no-nonsense business person and who was very driven. He came with an MIT business background with a "technical" bent to his style. He met people well, was very driven, got things accomplished on time, and was some what cold. did not build a personal relationship with the candidate while he worked for him because their styles and personalities were so different.	Ъ6 Ъ7С
Prior to becoming that job belonged to the current CEO for Cabot Corporation. Therefore and the candidate had a long standing relationship and the candidate used for advice. also had a major role as pn the business side.	Ъ6 Ъ7С
Cabot Corporation was not a friendly workplace. However, that could have been based upon the time period (early 1990's) and the location (Boston). Everything was cut-throat and bottom line oriented. However, that never included doing anything illegal. The candidate insisted to no mercy on the lawsuits and to get every nickel they could.	
Regarding the candidate's character, stated he was well regarded in the community and respected in the business world. was only aware of business associates and they were all Well respected.	b6 b7С

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The candidate was extremely loyal to the corporation, b6 the Board, and the shareholders. His reputation was that of a hard-nosed, driven executive, and his ability was very high. b7C dvised he never observed, or heard of, any instance where the candidate expressed or manifested any bias or prejudice against any individual or group based on age, sex, race, color, religion, or national origin.

The candidate handled corporation finances very well b6 did not know him well enough to comment on his and b7C personal finances. The candidate was very well paid by Cabot Corporation.

b6 was aware of nothing in the candidate's b7C background that could be used to influence, pressure, coerce, or compromise him in any way or adversely impact on his character, judgement, stability, responsibility, discretion, or trustworthiness.

knowledge, he never heard of To the best of the use, possession, purchase, sale, manufacture, or any type of b6 distribution of illegal drugs by the candidate. knew of b7C no alcohol or prescription drug abuse. The candidate was energetic and devoted to his goals and he could handle stress very well.

When asked if would recommend the candidate for a position of trust and responsibility with the United States b6 finally stated he Government, there was a long pause. b7C would recommend the candidate, but there are other capable people he would recommend much more readily. stated that he and the candidate were different in their personalities and never got close. At the end, they both decided it would be better for both of them for to go elsewhere.

was asked if At this point in the interview, Ъ7С there was ever any event in which someone tried to run him down with a car and was this connected with the candidate.

b6 smiled, laughed and then stated someone had b7C distorted the facts. He was the victim of a hit and run, but neither the candidate nor Cabot Corporation had anything to do with it.

stated a year before he left Boston, he and his **b6** wife went for a jog in the spring, returned to their Condo, got b7C their two dogs and went for a walk. They were crossing a four lane street at a cross walk in front of the Cheers bar. Both he

b6

#### 161B-HQ-1337020

and his wife heard two motorcycles gunning their engines 100 feet It was 11:00 a.m., sunny and no traffic. They crossed the away. street with their dogs when he heard one of the motorcycles. ooked up and saw it coming dead at him. He could not react quick enough and the motorcycle hit him, went on it's side, ended with his legs under the bike. and drug him. His got to the curb and sat down. wife was hysterical. He kept insisting he was alright. The police and fire responded. They placed on a back board and took him to the hospital. In his right leg, he had two broken bones and a damaged tendon. underwent surgery and rehabilitation, and ended up with a plate and six screws in his leq.

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b7C

who hit him. \_\_\_\_\_ attorney negotiated a settlement with the b6 b7c other insurance company and settled for \$100,000 (max coverage) with 25% going to \_\_\_\_\_ attorney.

Neither the candidate nor Cabot Corporation had anything to do with the accident. They gave him time off and later good referrals.

At one point, (current Cabot Corporation CEO) <u>suggested</u> the accident was a result of carelessness. b6 did not understand that comment. xplained Cabot b7C <u>Corporation</u> is a dog-eat-dog company with tremendous turn-over in senior management. There is probably a lot of ill-will toward the candidate and Cabot Corporation.

He knew of nothing he would consider illegal.

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FD-263 (Rev. 4-30-85)

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD		
New York TITLE OF CASE	BUREAU	05/31/01 REPORT MADE BY	05/24/2001-05/	30/2001 TYPED	BY:
SAMUEL WRIGHT BODM	AN, III	SA		J	L
		CHARACTER OF CA	ASE b	6	
		LEVEL II -	PAS b	57C	
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### **REFERENCE**:

# 161B-HQ-1337020, serial 24

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# ADMINISTRATIVE:

All persons interviewed were furnished the appropriate provisions of the Privacy Act of 1974 and no promises of confidentiality were granted.

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FD-204 (Rev. 12-1-95)		
	UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation	
Copy to:		ı
Report of: Date:	SA Office: New York May 30, 2001	Ь6 Ь7С
Case ID #:	161B-HQ-1337020	
Title:	SAMUEL WRIGHT BODMAN, III	
Character:	LEVEL II - PAS	
Synopsis:	Investigator interviewed investigation not verified.	

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161B-HQ-1337020 JL:

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#### **INVESTIGATOR:**

The following investigation was conducted by Special Agent b6 (SA)

On May 30, 2001, JUDGE HAROLD R. TYLER, Jr., born May 14, 1921, social security account number: 076-18-9948 is employed as a Partner at PATTERSON, BELKNAP, WEBB & TYLER LLP, (PBW&T) 1133 Avenue of the Americas, New York, New York, telephone number (212) 336-2600, advised that he has no independent memory relating to an investigation he is reported to have conducted regarding allegations that SAMUEL WRIGHT BODMAN, III misused CABOT funds. TYLER consulted employess of (PBW&T) who reviewed past records indicating that BODMAN was listed on an outline as reportedly giving a deposition as a witness in a case. TYLER informed that this file is no longer available.

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FD-263 (Rev. 9-8-97)

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD	
Richmond	BUREAU	06/04/2001	5/30/2001	
TITLE OF CASE		REPORT MADE BY		TYPED BY
SAMUEL WRIGHT BOD	MAN TIT		b6	
		SA	b7C	jzg
		CHARACTER OF CA	SE	
		LEVEL II - F	PAS	

<u>Reference:</u> Bureau EC to Boston dated 5/23/2001.

-RUC-

Administrative:

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All persons interviewed were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality have not been granted.

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FD-204 (Rev. 12-1-95)

#### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of:	SA	Office: Richmond	b6
Date:	06/04/2001		b7С
Case ID #:	161B-HQ-1337020		

Title: SAMUEL WRIGHT BODMAN III

Character: LEVEL II - PRESIDENTIAL APPOINTMENT WITH SENATE CONFIRMATION

Synopsis: Interview set forth.

#### - RUC -

DETAILS:

#### INTERVIEW

On May 30, 2001, Howard Blauvelt, date of birth February 11, 1917, Social Security Account Number 075-12-6743, 1410 Piper Way, Keswick, Virginia, 804/979-1997, telephonically contacted the Charlottesville Resident Agency, Charlottesville, Virginia, in response to a message left at his home. Blauvelt was advised he could provide any information he may have on the candidate on a confidential basis; however, Blauvelt advised confidentiality was not needed.

Blauvelt advised he met the candidate while they both served as directors for a company, which was a subsidiary of Cabot Corporation, known as Cabot Oil and Gas (COG). Blauvelt advised he met the candidate at approximately 12 board meetings for COG over a span of approximately two to three years. Blauvelt advised these board meetings took place some seven or eight years ago. He advised he has not had any social contact with the candidate, or any contact with the candidate since the aforementioned board meetings.

#### 161B-HQ-1337020

Blauvelt described the candidate as a very intelligent man who is a very capable individual. Blauvelt advised he knows of no one who can question the candidate's character, reputation, or loyalty to the United States Government. He advised he does not know whether or not the candidate drinks, but has no information to indicate the candidate has ever abused alcohol, used or experimented with any illegal drugs, including marijuana, or abused prescription drugs. Blauvelt advised he has no knowledge of the candidate ever selling, purchasing, possessing, manufacturing, producing, shipping, or receiving any illegal substances. Blauvelt has no knowledge regarding the candidate living within his financial means; however, he is aware that the candidate has received significant compensation as a result of the positions he has held. The candidate has never expressed any biases or prejudices toward any group or individual based on race, sex, age, religion, national origin, color, or handicap.

Blauvelt advised he does not have any knowledge of any circumstances that would have any negative impact on the candidate's suitability for access to classified information. He advised he is not aware of anything that could be used to influence, coerce, pressure, or compromise the candidate in any way, or that could have an adverse impact on the candidate's judgment, stability, discretion, trustworthiness, or responsibility.

Blauvelt stated he has no information whatsoever regarding allegations of improprieties by the candidate's misuse of Cabot funds. Blauvelt stated the candidate's character is impeccable. He advised his experience with the candidate as a director leads him to believe that the candidate is qualified to undertake a position of importance within the United States Government.

Blauvelt advised he highly recommends the candidate for a position of trust and confidence with the United States Government.

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FD-263 (Rev. 4-30-85)

# FEDERAL BUREAU OF INVESTIGATION

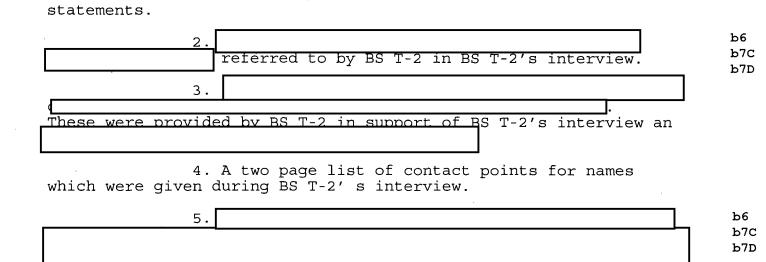
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Boston	Bureau	6/5/01	3/22/01-5/5/01			
TITLE OF CASE		REPORT MADE BY	1 _b6	TYPED BY:		
SAMUEL WRIGHT BODMAN III		SA	<u>М</u> ръ7с	aes		
		CHARACTER OF CASE				
		LEVEL II	PAS			

**BUDED:** (Past) All inserts, 302's and enclosures which had been completed or received were faxed to PSS \_\_\_\_\_\_ on the deadline. After that all \_\_\_\_\_\_ b6 items which were being generated as a result of the background \_\_\_\_\_\_ investigation's revelations were faxed upon completion or receipt. The review of transcripts, over 3000 pages is continuing and the interview of the General Counsel's Office at Cabot as requested by FBIHQ on 5/30/01 was scheduled for 5/6/01, the soonest date that office was available.

**<u>REFERENCE</u>**: Bureau EC to Boston dated 3/21/01. Regular telcals (over b6 30) throughout the investigation to PSS and her supervisor b7C Regina Thornton due to the multiple axis of pursuit generated in many separate areas in this investigation.

#### ENCLOSURES:

by BS T-2 and his/her lawyer becaus	b6 b7c some items sent directly to SIGBIU e of their voluminous nature (several its were provided to support BS T-1's
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Note: items 1-6 provided by BS-T1.

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8. A letter responding to writer's request for the divorce transcripts of candidate's divorce action from candidate's ex-wife's lawyer. This letter requested a subpena before the transcripts would be produced. (note: under separate cover the filings of each party were sent directly to SIGBIU and not summarized by Boston, per SIGBIU's instruction.)

9. A review by the Boston Office of the elements of the FCPA.

10. The findings of fact and <u>conclusions of law</u> of the MCAD regarding the matter brought by against Cabot Corporation. These included damage of approximately .3 million dollars.

11. Three 1-A envelopes containing the notes of the interviews of candidate, BS T-1 and BS T-2.

12. Copies of certain pages of the transcripts and affidavits which are referred to in an investigative insert.

**ADMINISTRATIVE:** A review of Boston's general and computer indices

Cover Page

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b6 b7С regarding the appointee and all listed relatives located in the Boston area was negative.

All persons interviewed were advised of the Privacy Act of 1974. Two persons requested anonymity from all individuals outside the Bureau.

1. BS T	-1 is			b
				b' b'
2. BS T	-2 is	[		

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#### FEDERAL BUREAU OF INVESTIGATION

Date of transcription 4/16/01

BS T-1, who requested that BS T-1's identity be protected from anyone outside the FBI. This information is one of several employee interviews. Since the candidate knows which employees were interviewed, and since none of the others requested confidentiality, release of those interviews would allow the candidate to identify that this interview was being withheld and to know who had given negative information. The person requesting confidentiality would thus be identified by process of elimination and would be damaged professionally. BS T-1 advised as follows:

BS T-1 has knowledge that the candidate, SAMUEL WRIGHT BODMAN III, is an employee of the Cabot Corporation, Two Seaport Lane, Suite 1300, Boston, Massachusetts. BS T-1 was informed of the identity of the interviewing Agent and of the purpose of the interview, that being to obtain complete information on BODMAN who is being considered for a Presidential Appointment.

BS T-1 would describe BODMAN as a very bright, personable individual, who is very easy to talk to. BODMAN listens to a variety of ideas and is open to other approaches. He reacts well to stress but will start to close down a little more and be less receptive to new ideas.

BS T-1 stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.

BS T-1 stated that BODMAN's reputation in the community is very good.

BS T-1 stated that BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition, BODMAN has never exhibited any signs or expressed any opinions which would indicate that he

Investig	ation on _	4/14/01	at BOSTON,	MASSACHUSET	TS		
File #	161B-H	<u>Q-1337020</u>		D	ate dictated	4/14/01	
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° FD-302a (Rev. 10-6-95)

161B-HQ-1337020

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	any personal intioned class	against	any	group	of	citizens	or	、 b6 b7C b7D

161B-HQ-1337020

Continuation	of FD-302 of	, On <u>4/14/01</u> , Page	3
[	BODMAN	BS T-1 also stated that he still strongly recommended for this appointment and advised that BODMAN is	Ь6 Ь7С Ь7D
]	this si	BS T-1 provided the names of those who were aware of ituation. They were BS T-1 also advised that	ь6 ь7с ь7р

To the best of BS T-1's knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States Government or who are involved in the use of terrorism, espionage or sabotage. BODMAN supports the constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United Stated. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to BS T-1.

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of BS T-1's knowledge, BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as BS T-1 knows, BODMAN has never been involved

161B-HQ-1337020

Continuation of FD-302 of

, On 4/14/01, Page

4

in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

BS T-1 strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. BS T-1 advised that the answers to the above questions were true and complete to the best of his knowledge.

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	FD-340 (Rev. 8-7-97)
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#### A QUICK GUIDE TO BACKGROUND INVESTIGATIONS

#### PRINCIPAL AREAS TO BE ADDRESSED WITH THE APPOINTEE

#### III. EDUCATION

\_\_\_\_\_

If you attended a college or university in the past three (3) years, identify two to three professors who have knowledge of you?



Details of professional complaints or any non-judicial disciplinary action, i.e., Bar Association grievances, Better Business Bureau complaints, student or military disciplinary proceedings, Equal Employment Opportunity complaints, Office of Professional Responsibility Inquiries, or sexual harassment type complaints etc.

Nousc

IV. EMPLOYMENT HISTORY

\_\_\_\_\_

The names, addresses, and telephone numbers of at least two (2) co-workers at each employment who have knowledge of you? What are the dates of employment and provide pertinent data containing any reason for terminations, any denials for employment, and/or dismissals?

Have you been self-employed, if so names of employees and business associates?

\* Note: Determine from appointee, employees and business associates the appointee's business reputation, any complaints or grievances filed against the appointee's company, i.e., Better Business Bureau and EEO.

Does the business provide service to a foreign country, any foreign national, or a representative of any foreign interest?

Does the business engage in analysis, discussion, or publication of material on intelligence, defense, foreign affairs, or protected technology?

Will need the names and addresses of associates currently residing in the US, in addition to two (2) co-workers? Will need to verify periods of unemployment through the names and addresses of individuals, i.e., references, associates, and neighbors? Dates or time frames involved? What were your activities while unemployed? How were you supported?

V. MILITARY RECORD

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What were your dates of military service (active and reserve), awards received, rank attained, performance evaluations, disciplinary actions, clearances granted, and the type of discharge received? Places of assignment, i.e., duty stations?

If you have been discharged in the last five (5) years from the military service, identify your rating and/or supervising officers, and coworkers at your duty station during this period.

#### VII. FOREIGN TRAVEL

	Have you, your immediate family, or in-laws, ever had any contact with or been visited by individuals known to be foreign nationals?
	Have you had contact with foreign establishments or foreign trade representatives; have you been employed by or acted as an agent for a foreign government or entity?
	Do you have family or friends residing in foreign countries?
	Do you have a substantial financial interest in another country or in any foreign owned or operated business that could make you vulnerable to foreign influence?
<u> </u>	Do you share living quarters with a person of foreign citizenship?
	Have you ever had any contact, outside of the scope of your professional responsibilities, with any foreign nationals?
	Do you exercise dual citizenship?
	Do you possess and/or use a foreign passport?
	Do you have a residence in a foreign country to meet citizenship requirements?
	Do you use foreign citizenship to protect financial or business interest in another country?
	Have you held political office in a foreign country or voted in foreign elections?
<u> </u>	Have you traveled outside of the United States, i.e., country visited, dates, reason for travel?
VIII. ORGA	ANIZATION MEMBERSHIP
	Have you any membership in organizations whose policies restrict membership on the basis of sex, race, color, religion, or national origin?

\* Note: If so, ascertain your personal viewpoint toward such policy and if you have taken any steps to alter official or covert restrictive admission policies.

. 4. Have you any involvement in any organization which advocate the use of force to overthrow the U.S. Government, or any involvement in the commission of sabotage, espionage, or the assistance of others in terrorism?

#### IX. COURT RECORD

Have you ever been a plaintiff or defendant in any civil suit, including divorces? Identify date civil lawsuit filed, issues litigated, court of jurisdiction, case name, docket number, court case file number and disposition. Also obtain copy of petition/complaint filed and ascertain any court ordered obligations imposed and if complying as ordered by the court. Obtain names of attorneys for possible interview.

Have you associated with persons involved in criminal activity?

Have you been involved in any criminal matter as a suspect or subject, or been criminally charged, arrested and/or convicted?

\* NOTE: Provide date, charge, disposition, and court/police department of jurisdiction.

#### X. FINANCIAL STATUS

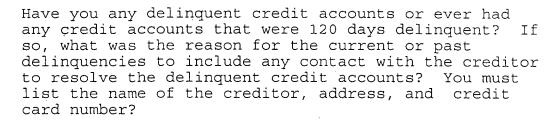


Have you any business/investment circumstances that could or have involved conflict of interest allegations such as deceptive or illegal financial practices, filing deceptive loan statements and other intentional financial breaches of a trust?

Have you any personal or business credit issues, including but not limited to, property being

5

repossessed, debts placed for collection, any tax liens, garnishments, other financial obligations imposed by law, i.e., child support payments, had a legal judgment rendered concerning a debt, file for Bankruptcy, or had any student loans in default.



As an individual or an employer are you current on all federal, state, and local tax obligations? Have you ever made back payment of any such tax to include, but not limited to, Income taxes, Medicare taxes, Social Security taxes, and Unemployment taxes, for a nanny, housekeeper, i.e., domestic help? When one manual problems that are linked to

Do you have any financial problems that are linked to gambling, drug abuse, alcoholism, embezzlement, employee, theft, check fraud, income tax evasion, or expense account fraud etc.?

Is your lifestyle or spending habits consistent with your financial means?

Do you have any unexplained affluence?

Do you have a history of not meeting financial obligations?

#### XI. SPECIAL QUALIFICATIONS AND SKILLS

Are you licensed to practice law, accountancy, teaching, real estate, or medical? If so, in what states licensed, current status, license identification number and any details of complaints or grievances filed against you?

#### XII. RELATIVES

Do you have a relative or associate recently or in the past been involved in misconduct? Among factors to be addressed is the nature and seriousness of the conduct, whether of a recurring nature, attempts at rehabilitation, and the time frame. What degree of actual or potential influence such people may exercise on you? How frequent are the contacts you have with that individual?

#### XVI. PERSONAL DECLARATIONS

Have you ever sold any illegal drugs?

- Have you used any illegal drugs within the last three years?
- Have you used marijuana more than fifteen (15) times during your life?
  - Have you used any illegal drugs, other than marijuana, more than five (5) times total? If use is five (5) or less times, it cannot have been within the last ten (10) years?
    - Have you used illegal drugs while employed in a sworn law enforcement, prosecutorial position, or any position of high public trust?
      - Have you participated in any drug/alcohol counseling rehabilitation programs?
- \* Note: Identify all drugs used, when used, duration of usage, amount of drugs used, place where drugs were used (public or private setting), how the drug was obtained, and the identities and current whereabouts of individuals having knowledge of your drug use.
  - Have you abused either prescription drugs or alcohol? If so, have you participated in any drug/alcohol counseling/rehabilition program? Identify individuals having knowledge of prescription drug or alcohol abuse.
  - Have you had any prescription drug or alcohol related incidents such as driving under the influence, fighting, child or spousal abuse?

Have you had any psychological counseling with psychiatrists, psychologist, other qualified counselors or others (including marital counseling for occasions of physical abuse)? \* Note: Dates, duration, medication prescribed, purpose of treatment, names and locations of doctors or counselors? Did a credentialed mental health professional ever treat you for a pattern of high-risk, irresponsible, aggressive, antisocial or emotionally unstable behavior?

Are you concealing any activity or conduct that could be used to influence, pressure, coerce, or compromise you in any way, or that could have an adverse impact on your character, judgement, stability, discretion, trustworthiness, or responsibility?

- Have you been directed by any foreign country representative to obtain a position with the FBI or U.S. Government?
  - Do you harbor any biases or prejudice regarding the sex, race, religion, or national origin of any person or organization?
- Are there any other current or past circumstances known to you that could have a bearing on your suitability for federal employment and/or access to classified information?
  - Have you been directed by any criminal element to obtain a position with the FBI?
    - Have you been denied a security clearance by any agency of the Federal government? If so, was it for unauthorized disclosure of classified information and was it deliberate or due to negligence?

Are your oral responses to the above questions true and correct to the best of your knowledge and recollection?

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plant in fava an for western T.p. Tariffs dumping g products from other Asian Countries reasonable anti demping finding SONA TRACH Alogeria oil+ gro co. Cabot had defaulted on Co subsidiar in bank rupty in Boston Negohateng settlemene + rebuilding commercial relations others were commoncal minister Trade Victoria Australia Brember 1 Parliment England But plans PM came Trindad Tobage Plent ? 900 Be Directors TU En Wales Creeh Rep En Wales mem Parlimente Wales (1992 + area arnind Bermy Li open lebor/ cmarrature De labor/ cmarrature government officials Nigere to neg centract + purchase LNG- (Lequitreel National Gas) gen Manage og she Nigerian Natimin 61/Co. not personally negotrate

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(01/26/1998)	CONFIDE	NTIAL	
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Preced	ence: ROUTINE	<b>Date:</b> 04/19/	2001
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DECLASSIFIED BY: NSICC

RE:

CC:

SSA

ON 09-19-2019

Attached is a current copy of the Foreign Corrupt Practices Act (FCPA), comprised of 15 U.S.C.A. § 78dd-1; 78dd-2; 78dd-3. Also attached are excerpts from two recent law review articles which succinctly summarize the FCPA and its significant amendments.

Foreign Corrupt Practices Act Research Assignment

### The purpose and scope of the FCPA are as follows:

The FCPA was passed in 1977 in response to information uncovered in the Watergate proceedings and subsequent investigations which revealed the large amount of corruption and bribery ongoing between American political organizations and corporations and foreign officials and corporations.

The Act makes it unlawful for any U.S. corporation, individuals, or the agents of corporations and individuals to engage in foreign corrupt practices both in and outside of the United States. The Act also applies to foreign corporations, individuals, and their agents engaging in corrupt practices while in the United States.

A corrupt practices is defined as any offer, authorization or promise of payment, or actual payment of anything of value to a foreign official, including government officials, political party officials, political candidates, or officials of international organizations to influence their decisions or actions in their official capacity. The Act also covers payments made to friends, family, and associates of officials if the payment is made with the understanding that a significant amount will go to the official as a bribe.



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b6 b7C The act is broken into three parts, sections 78dd-1, covering prohibited foreign trade practices by issues; 78dd-2, covering prohibited foreign trade practices by domestic concerns; and 78dd-3, covering prohibited foreign trade practices by persons other than issuers or domestic concerns. These sections apply to the different aforementioned classifications of people and corporations who are subject to the FCPA.

The only exceptions and affirmative defenses to charges under the FCPA are as follows: payments made to foreign governments for routine government actions (called the "greasing exception", usually small payments to low-level government officials to ensure prompt delivery of goods already contracted for, etc.); payments that are lawful in the foreign jurisdiction in question (although bribery is technically outlawed almost everywhere); and reasonable and legitimate expenditures for promotional activities or in the furtherance of a contract (i.e. reimbursement for a plane ticket to a meeting or trade show).

Penalties can range from up to five years in prison, as well as fines of up to \$2,000,000 for corporations and \$100,000 for individuals.

There are also accounting requirements under the FCPA which lay out guidelines for bookkeeping in an effort to prevent corporations from hiding bribe payments as other expenditures in their books.

CONERDENTIAL

FD-204 (Rev. 12-1-95)

# UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of:SAD6Date:June 5, 2001b7C

Case ID #: 161B-HQ-1337020

Title:

SAMUEL WRIGHT BODMAN III

Character: LEVEL II - PAS

Synopsis:

Education verified with no derogatory information or outstanding debts. All Law enforcement checks negative. Divorce verified. Candidate interviewed. No information regarding any complaints of sexual harassment or discrimination, any metal health consultations (other than marriage counseling), or substance abuse issues reported.

The Massachusetts Commission Against Discrimination shows that an action was brought by and though sexual harassment was not found she was awarded damages for emotional distress and unequal pay based on gender totaling over .3 million dollars.

One woman's affidavit and another's testimony revealed unwelcome touching by candidate. The affidavit also described that another senior male employee had kissed her without warning and that she found this offensive. She advised that based on candidate's reaction, she concluded that her only choice was to leave the company. testimony described an executive committee on which candidate sat. This committee decided that she needed to

b6 b7С

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

There are several thousand pages of testimony and the review of this testimony is ongoing.

Employment was verified and two Board of Trustee members were interviewed. Two neighbors and candidate's driver also provided positive references. Ten co-workers at Cabot were interviewed as well as three from Fidelity. All recommended candidate for appointment.

<u>Two ind</u>ividuals requested anonymity. BS T-1 advised of but still recommended candidate. BS T-1 advised

Candidate's memberships in clubs, his trusteeships and his work advising non-profits was verified with favorable results.

Note:

associate

Fidelity.

and a listed reference.

is both a co-worker at Cabot and listed as a reference during college and graduate school.

both verified employment and acted as a coworker reference at Cabot.

is a professional associate in that he is

\_\_\_\_\_provided neighbor verifications but is also a professional associate.

are both references and professional

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b6 b7С b7D b6 b7С 161B-HQ-1337020 MBD/mbd

# DIVORCE

On 4/13/2001, divorce records were searched at the Suffolk County Probate and Family Court, Boston, Massachusetts, and the following information was obtained from review of Docket Number 95D 0099 DV1:

Samuel W. Bodman (Plaintiff) and Lynda A. Schubert Bodman (Defendant) were granted a divorce nisi on 4/29/1997 for the cause of Irretrievable Breakdown of Marital Bond. On 7/29/1997, the divorce became final.

### ORGANIZATION MEMBERSHIPS INCLUDING

## <u>CLUB MEMBERSHIPS</u> <u>NON-PROFIT TRUSTEESHIPS AND</u> PAID DIRECTORSHIPS OF PUBLIC COMPANIES.

Agent The following investigation was conducted by Special

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SAMUEL BODMAN III, is the member of several Country Clubs as revealed in his candidate interview in Boston on 4/12/01.

The Country Club, 191 Clyde St., Chestnut Hill, Brookline MA, 02467, (617)566-0240 was contacted on 4/16 and 17/01. The club was founded in 1882. On 4/17/01, advised that Mr. BODMAN has no policy making role and holds no office at the Club. In 1989 the club began to admit women. There is a no discrimination policy within the Club as reflected in its bylaws. advised that the club does not discriminate against any class of citizen to include race, religion, ethnic or national origin, sexual orientation, gender, age or disability whether mental or physical.

The Somerset Club, 42 Beacon St., Boston MA, 02108, (617)227-1731 was contacted on 4/16 and 17/01. On 4/17/01, advised that the bylaws of the club reflect the fact that they had a no discrimination policy. The club was founded in 1851 and women were admitted in 1985. This is a social club providing dining and accommodations. BODMAN is a member and does not hold an office or have any policy making role. discriminate against any class of citizen to include race, religion, ethnic or national origin, sexual orientation, gender, age or disability.

Lost Tree Club, 11520 Lost Tree Way, N. Palm Beach FL, (561)626-7342 was contacted on 4/16/01. advised that the club does not discriminate against any class of citizen to include race, religion, ethnic or national origin, sexual orientation, gender age or disability. BODMAN does not have a policy making role or hold an office.

The West Chop Club in Tisbury on the Island of Martha's Vineyard, off of Cape Cod MA (508)696-7596 was called on 4/16 and 4/17/01 the phone rang with no answer of any kind so no messages could be left. It is possible that this club is seasonal, only

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opening after Memorial Day.

Club, 1 Potomac Dr. Houston TX, 77057, (713)465-8381 responded on 4/17 to messages previously left and advised that BODMAN is a member who has no policy making role nor does he hold any office. advised that the club does not discriminate on the basis of race, religion, national or ethnic origin, sexual orientation, gender, age or disability. advised that he is knowledgeable of the bylaws and that there is no discriminatory language. advised he is not involved in the membership committee and cannot comment on the selection process.

In his written history, SAMUEL BODMAN revealed seven Non-Profits at which he had a trusteeship or other role. None of these were compensated. All were contacted by Special Agent on the dates indicated. (It should be noted that the information regarding the Trusteeship at MIT is contained in the interview of \_\_\_\_\_) The following information was provided regarding the trusteeships:

of the Isabella Stewart Gardener Museum, 2 Palace Rd, 80 renway, Boston MA 02115, (617)278-5132 advised, on 4/13/01, that BODMAN was a Trustee there. His role was to handle financial decisions by setting broad policy regarding the budget. He was not compensated. There were never any complaints against him and he was well respected. Neither BODMAN nor the Museum engages in any form of discrimination against any class of citizen to include race, religion, national or ethnic origin, sexual orientation, disability age or gender.

b7c New England Aquarium, Central Warf, Boston MA 02210, (617)973-5220 advised, on 4/17/01, that BODMAN attends two meetings per year as a Trustee of the Aquarium. There are 115 trustees, 27 are on the Governing body and 8 of those are in a smaller group of the Board. BODMAN has risen to be among those eight. He receives no compensation. BODMAN is no the Executive Committee and the Board of Governors. This group oversees the management of the Aquarium. It has power to change by-laws and authorize signatories and oversee finances. The Function of the Aquarium is to educate/entertain the public, and to promote conservation and research. The Aquarium does not discriminate in any way against any class of US citizen. There have been no complaints against BODMAN and his term goes until May of 2002. b6 b7С

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The French Library and Cultural Center was contacted on 4/16 and 4/17 by SA \_\_\_\_\_\_ and requested a written b6 This query was provided to query. Executive b7C Director. This center is possibly staffed by French Nationals. of Clearance Personnel Administrative and Security Operations, MITRE Corporation, 202 Burlington MA 01730, (781)271)2000 advised on 4/13/01 that MITRE is a non-profit company which came out of MIT and is a Think Tank b6 for the United States Air Force. BODMAN would have had a T.S. b7C clearance to be on the Board of Trustees. does believe that BODMAN was compensated in any way. BODMAN's role was to help ensure the successful implementation of ethics, values and with compliance issues. The values include impartiality and the service of the public interest. BODMAN was there from 1987-1996. The Board itself meets 2-4 times per year. to the Corporation and the Board of Trustees, Northeastern University, 360 Huntington Ave, 400 Churchill Hall, Boston MA 02115, (617)373-2106, advised on 4/16/01 that BODMAN has no policy making role or fiduciary responsibility. BODMAN meets one time per year to help b6 select the external auditor, review the bylaws and to elect the b7C members of the <u>qoverning</u> boards such as trustees. He is not a trustee per SE. did not know him well enough to comment on him in any way. advised that Northeastern University does not discriminate in any way against any class of US citizen. Babson College, Babson Park MA 02471, (781)239-4263 was contacted on b6 4/17 and 4/18/01. (Babson Park contains only Babson College and b7C is in Wellesley. However, it has its own zip code separate from the town of Wellesley). She advised that BODMAN attended 3-4 meetings per year and served as a trustee from 1983-1990. He is now an honorary trustee. BODMAN received no compensation. The trustees set policy and procedure for the faculty and give final approval for the budget. There were no complaints against BODMAN. Babson college does not discriminate against any class of citizen. In his written history BODMAN revealed Directorships of b6 Public Companies, including the Cabot Corporation. b7C were interviewed separately in the References/Associates section regarding his performance at Cabot.

Several other Directorships were also listed. Those located outside the division are being handled in their

respective Divisions. The contacts in those Companies were provided by BODMAN's secretary at writers request and given to her by BODMAN. There were two Directorships in the Boston Division. They were both contacted.

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, John Hancock Place 200 Clarendon St. Boston MA 02117, (617)572-9182 advised that he is also and

Community Relations, Government Relations and the Compliance Law Office, which has a staff of 55 lawyers. advised that BODMAN has receives compensation for his role as a Director.' BODMAN's compensation includes a \$40,000.00 yearly retainer, and five or ten thousand dollars more for his role as Chairman of the Compensation Committee. For each meeting he attends, BODMAN receives \$1,500. In addition, BODMAN receives stock dividends. BODMAN is on the Corporation Nominating and Governance Committee as well as the Executive Committee. BODMAN is Chair of the Compensation Committee. also serves as a Director, but as an inside director, that is since he is also employed by John Hancock, receives no compensation. There are about 8 meetings per year and then 12-14 more committee meetings.

advised that here have been no formal or informal complaints against BODMAN for any reason to include conflict of interest, sexual harassment, breaches of trust fiduciary or otherwise and that BODMAN is a highly honorable man who enjoys a good reputation. BODMAN does not engage in any form of discrimination and John Hancock does not either. \_\_\_\_\_\_ called attention to the fact that as an African American man, he would be aware of aspects of this kind of thing, if it were to occur. \_\_\_\_\_\_ recommends BODMAN for a security position with the US Government. \_\_\_\_\_\_ as known BODMAN for several years. BODMAN has served on the Board for about 20 years and \_\_\_\_\_\_ began serving in February of 1998. Though he could no comment specifically he has never heard of any instances of substance abuse on the part of BODMAN.

Two individuals were contacted at Thermo Electric Corporation, 81 Wyman St. Waltham MA 02454. They were to the Vice President (781)622-1174 and (781)622-1200.

on 4/17/01, \_\_\_\_\_\_ advised that BODMAN receives a retainer's fee of \$28,000.00 per year and \$1,000.00 for each meeting he attends. He also receives stock options. BODMAN became a member in 5/99. BODMAN is now Chairman of the

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Compensation Committee (which makes salary decisions). BODMAN makes decisions regarding corporate organization, the performance of Senior Members, the Nominating Credentials for new members. There have never been any types of complaints against BODMAN. Thermo Electron does not practice any form or discrimination against any class of citizen.

On 4/16/01, \_\_\_\_\_\_advised that the Board of Directors meets six times per year. \_\_\_\_\_\_advised that the company is a Publicly Traded Company and that it produces esoteric instrumentation for the pharmaceutical and telecommunications b6 areas. The Mass Spectrometer is one of the major pieces of b7c equipment produced. \_\_\_\_\_advised that BODMAN has never had any problems with illegal drug, alcohol or prescription drug abuse. \_\_\_\_\_\_knows of no involvement of BODMAN is any aspects of the drug trade. BODMAN supports our constituted form of government and has never expressed any sympathies with other governments. \_\_\_\_\_\_ recommends BODMAN strongly for a position of trust with the US Government.

#### EDUCATION

Massachusetts Institute of Technology MIT Campus Police Department 120 Massachusetts Avenue Cambridge, Massachusetts 02139

Aqent On April 12, 2001, MIT Campus Police, telephone number (617) 253-9751, was advised of the identity of the interviewing agent and the purpose of the interview to determine if the Massachusetts Institute of Technology Police Department records contain any derogatory information concerning the candidate, SAMUEL WRIGHT BODMAN III, date of 11/26/38, and Social Security Account number 329-32-7756. was also furnished a copy of the Authorization for Release of Information, dated March 15, 2001 and signed by the candidate. was advised that the candidate is being considered for a Presidential Appointment which requires a background investigation for possible access to National Security information. thereafter furnished the following information:

The following investigation was conducted by Special

derogatory information on candidate.

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# EDUCATION

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Massachusetts Institute of Technology Registrar's Office 77 Massachusetts Avenue Cambridge, Massachusetts 02139-4307

The following investigation was conducted by Special Agent	b6 b7С
On April 12, 2001, Registrars Office, telephone (617) 258-6414, was advised of the identity of the interviewing agent and the purpose of the interview concerning the candidate SAMUEL WRIGHT BODMAN III, who is being considered for a Presidential Appointment which requires a background investigation for possible access to National Security information. Was furnished a copy of Authorization for Release of Information prepared by the candidate on March 15, 2001. thereafter furnished the following information from available official records of the candidate:	Ъ6 Ъ7С
advised the candidate was enrolled at the Massachusetts Institute of Technology (MIT) for the following dates: September 1961 to Feb 2, 1965. He recieved a Doctor of Science Feb 2, 1965.	b6 b7С
advised the candidate's cumulative grade point average (GPA) was not maintained. Stated that graduate level students at MIT are not given any class ranking nor are students given any sort of honors such as the Dean's List, Magna Cum Laude, etc.	b6 b7С
stated at the time of the candidate's most recent enrollment his address was listed as 770 Timberline Drive, Akron OH.	Ъ6 Ъ7С
advised the candidate was never on academic probation or the subject of any disciplinary problems. further advised the registrar's office has no derogatory information concerning the candidate.	b6 b7С

EDUCATION

Massachusetts Institute of Technology Student Financial Services 77 Massachusetts Avenue Cambridge, Massachusetts 02139

The following investigation was conducted by Special	ъ7С
Agent	
On April 5,Studen Loans, telephone number (617) 253-4007, was advised of the identity of the interviewing agent and the purpose of the interview concerning the status of any student loan record for the candidate SAMUEL WRIGHT BODMAN III, whose date of birth is 11/26/38 and Social Security Account number is 329-32-7756. was further advised the appointee is being considered for a presidential appointment which may require access to National Security informationwas furnished a copy of the Authorization for Release of Information form dated March 16, 2001.	Ь6 Ь7С

advised a search of the student loan files revealed the appointee has no record of a student loan or debts.

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#### LAW ENFORCEMENT AGENCY CHECK

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The following investigation was conducted by Special

On March 22, 2001, a check of the Massachusetts Criminal History System Board revealed there have been no adult court appearances for the candidate SAMUEL WRIGHT BODMAN III. his

filed in the Massachusetts Probation Central rife automated data base. This agency is the central repository for all arrests and convictions occurring in the state of Massachusetts.

On March 22, 2001, a check of the Massachusetts Division of Motor Vehicle License file revealed BODMAN has an active Massachusetts Driver's License number S79015127 othan a few citations for missing inspection stickers (1996, 1993, and 1985) he has no driver history. Ь6 Ь7С

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161B-HQ-1337020 LJS/ljs

# UNITED STATES ATTORNEY'S OFFICE:

On April 10, 2001, Docketing Section, United States Attorney's Office, District of b6 Massachusetts, Boston, Massachusetts, advised there was no prosecutive action, either civil or criminal on the candidate, SAMUEL WRIGHT BODMAN, III

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### EMPLOYMENT VERIFICATION/PROFESSIONAL ASSOCIATE

The following investigation was conducted by Special Agent on 4/11/01:	b7C
hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information:	Ь6 Ь7С
of Organizational	b6
Effectiveness. This includes Human Resources Functions and, at this level, employment verification responded both as the verifier of employment and a reference/colleague.	. b7С
is at	
BODMAN came to Cabot in January of 1987 as President for the purpose of replacing the former CEO (now of Ampersand Ventures (617)239-0700). They overlapped by three months. then went to the Board of Directors. There have never been any complaints against BODMAN, either formal or	Ь6 Ь7С
informal or conflict of interest issues. A review of the personnel file by writer found no derogatory information.	

\$650,00.00, \$23,500 of shares, and LTI shares of \$165,00.00 (which vest in three years). He was offered a four milliondollar bonus which he refused because he thought it was excessive. BODMAN's job is to create shareholder value.

BODMAN has been very successful at this. BODMAN defined the direction of Research and Development in a way which enabled it to produce new chemical processes which created a new direction for Cabot to include the development of Carbon Black, a substance which allows rubber to last and the creation of a slurry for the polishing of micro chips. Dow Corning became one of their biggest purchasers. BODMAN's ability to do this came from his background as a Chemical Engineer and his understanding of the possibilities of products on a molecular level. Also, Cabot now produces a silicon product used in cake mixes. Cabot's production of Tantelum and Niobium has allowed for their entrance

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into the capacitor market and given them a significant place in the market share.

Due to these advances and to Cabot's subsequent international diversification, Cabot is now debt free and worth 680 million dollars. The old Cabot Chemical Company has been replaced by a multinational company. Certain parts of Cabot have been sold off such as the Gas Company.

BODMAN made safety for its workers world wide the number one concern for the company. BODMAN introduced ethics standards which required Cabot's U.S. standards of safety, pollution, and anti-discrimination among others to be applied equally throughout the world.

BODMAN has taken an active stance on equality in the BODMAN asked for a review of the salaries because he workplace. saw something he didn't like in how employees doing secretarial work were paid. He asked for an analysis and saw to it that all secretaries were paid the same regardless of the status of the manager for whom they worked of when they had come in. BODMAN wanted to avoid even the appearance of discrimination in salary. In this instance, that served to equalize pay among those employees regardless of race even if race played no role in the salary difference.

BODMAN has actively developed young talent and sought to bring women into the upper echelons of the company.

advised that BODMAN is a person of integrity b6 b7C and even when he has deeply disagreed with and been angry with him, knows he can express contrary opinions without risking his position, status or BODMAN's respect.

came into his current position two years ago and called BODMAN the most ethical person he has ever dealt with. BODMAN does not micro manage but delegates. BODMAN can work well with people of different styles and has the skill to give constructive criticism. BODMAN's critiques leave a person better for having received it. BODMAN is good at developing talent.

During his divorce BODMAN suggested that the Board hire a private investigator so that as his now ex-wife made allegations they could be investigated.

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stated that BODMAN exercises good judgement **h**6 in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.

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**b**6 stated that BODMAN's reputation in the b7C community is very good.

To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of s knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

b6 As far as knows, BODMAN has never been b7C involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of b7C trust with the US Government which would include access to

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classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge.

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# PROFESSIONAL ASSOCIATE

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The following investigation was conducted by Special b7 Agent on 4/13/01:	7C
hereafter , was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. Was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality thereafter provided the following information:	
of Cabot Corporation, Two Seaport Lane, Suite 1300, Boston MA 02210, ph (617)342-6200, replacing BODMAN. Previously he was the and at Cabot.	Ъ6 Ъ7С
has known BODMAN for 30 years, they first met socially playing tennis at Country Club of Brookline, the first country club in the United States. They got together with each other and their wives 15-20 times per year for the first 15 years after they met. At Cabot they see each other constantly.	Ь6 Ь7С
would describe BODMAN as having great integrity and superior intelligence.	b6 b7С
blated that bobrian exercises youd judgement in	96 97C
la verv acod . Wiring hig divorge evervone wag pleagant w	56 57C
io ene bebe oriniowreage, bobinn nab never	o6 o7C

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of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

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BODMAN's professional character is high. He is a good leader and he does not micro manage. He is scrupulous and has never had any complaint related issues against him. His stamina is excellent.

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used b6 illegal drugs or been involved in anyway with their sale, b7c purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of<br/>trust with the US Government which would include access to<br/>classified material and access to national security information.b6<br/>b7Cadvised that the answers to the above questions were true<br/>and complete to the best of his knowledge.b6<br/>b7C

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## PROFESSIONAL ASSOCIATE

1

The following investigation was conducted by Special b6 Agent on 4/13/01: b7C hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and b6 b7C current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and waived confidentiality. thereafter provided the following information: of Cabot Corporation, where BODMAN is Chief Executive is also <u>on the Boa</u>rd of Trustees of Northeastern Officer. vork address and phone are: University as is BODMAN. Cabot Corporation, Two Seaport Lane Suite 1300, Boston MA 02210, (617) 342-6220. **b6** b7C has known BODMAN for about four and a half years. They see each other on a daily basis at Cabot Corporation. would describe BODMAN's character as serious, b6 open, curious and as interested in what you have to say as in b7C expressing what he has to say. also described as an astute teacher who has an uncanny ability to recognize and give opportunity and challenges to talent. BODMAN was described as accomplished executive leader who established communication and promotes ideas and vision throughout the organization. He is more a leader than a manager and delegates effectively. He has "taught an old world chemical company what its options are." **b6** described as an person of great integrity who, b7C once when the years profits where not what he had hoped for let the Board of Trustees at Cabot know that if they though some one else could do it better, he would step down. The Board had total confidence in him and no desire to replace him.

advised that he considers BODMAN a good friend and a stellar individual.

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Though, BODMAN is fundamentally an academic, he developed a of corporate values which were clearly taught to the company. They were enumerated and involved the concept that Cabot should function with integrity throughout the world. This vision is one of openness.

stated that BODMAN exercises good judgement in b6 choosing those people he surrounds himself with and that these b7c individuals have good standing in the professional community.

stated that BODMAN's reputation in the community is very high.

stated that, to the best of his knowledge, b6 BODMAN has never associated himself with any organizations whose b7C policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age. or any other class. Nor has BODMAN ever exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

BODMAN has actively pursued the introduction of women into the executive ranks of the workplace and is sensitive to issues related to the lack of people of color in the corporate world. There has been less success in that area and but BODMAN is interested in seeing that change.

In one of the plants in India there was a chairman of a company which was a subsidiary of Cabot. He tended to be very influenced by a person's caste. He was a very influential and high ranking individual. BODMAN tried to befriend him and introduce new talent. BODMAN was not quick to say he was right and that another person's culturally influenced behavior was wrong. He made every effort to be fair within a given culture. In practice, as individuals from different countries come to the U.S. for the cultural sensitivity training courses run by Cabot, they are affected to whatever degree and that gradually as they take this back with them, the culture in management changes. However, at the plant level, there is less change going on.

In the end BODMAN does not put up with discrimination and would ultimately not tolerate it.

BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved in the use of terrorism,

espionage or sabotage. BODMAN supports the constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United Stated. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known td

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse. has seen him drink wine with dinner and sometimes scotch. uses alcohol responsibly at all times.

As far as knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge. ь6 ь7с

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#### PROFESSIONAL ASSOCIATE

b6 The following investigation was conducted by Special b7C Agent on 4/11/01: hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and b6 current information is available and obtained concerning the b7C suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information: of Treasury Products at Cabot b6 b7C Corporation, Two Seaport Lane, Suite 1300, Boston MA 02210, (617)342-6343. is Canadian and holds a TN Visa under the Free Trade Agreement Act. b6 has known BODMAN for five years. b7C does not report directly to BODMAN, but to one level below him. sees BODMAN one on one a few times per year. b6 would describe BODMAN as one of high b7C integrity and high intelligence. He described BODMAN as not showing when he is under stress. advised that all his answers are only to the b6 best of his knowledge. b7C stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community. **b6** b7C stated that BODMAN's reputation in the community is very good. has never heard of any complaints against BODMAN. He advised that BODMAN appears to have very good stamina. b6 To the best of knowledge, BODMAN has never b7C associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never

exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of \_\_\_\_\_\_\_ knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been b6 involved in any type of activity or situation which could be used b7C to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

> . .

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge. Ъ6

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# PROFESSIONAL ASSOCIATE

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b6 The following investigation was conducted by Special b7C on 4/11/01: Agent hereafter was advised of the official identity of the interviewing Agent and **b**6 the purpose of the interview, that being to ensure complete, b7C accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment. in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information: Ъ6 work address and phone are Cabot b7C Corporation, Two Seaport Lane, Suite 1300, Boston MA 02210, (617)342-6222.was BODMAN's an at Cabot for four years and two years ago began working only for BODMAN. She stopped working for him in October. She now works for the **b6** person who will be the next CEO. stated that she and Ъ7C BODMAN were like oil and water in terms of personal style and individual sense of humor, but that she had only the highest reqard for him. She stated he always treated her with respect and that their relationship has become much warmer lately as BODMAN continues to become even more sensitive to others. She advised that they are different politically. Years ago she was buying a house and he asked her if she was paying cash or going through a bank. When she stated that she was going through a bank he responded that the only problem with that is that one has to pay interest. She wondered how he could think that middle class people could buy houses with cash and assumed his wealth left him somewhat out of touch. **b6** would describe BODMAN as a highly scrupulous b7c and person with great integrity. **b**6 stated that BODMAN exercises good judgement b7C in choosing those people he surrounds himself with and that these individuals have good standing in the professional community. b6 stated that BODMAN's reputation in the b7C community is very good. Others often seek out his advise. He 77.5°

used to be thought of by others as a bit intimidating but he has become much loser and has a superior reputation.

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To the best of \_\_\_\_\_\_ knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of \_\_\_\_\_\_ knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

As a professional, BODMAN is a tremendous leader with excellent speaking skills. He manages by not managing and delegates well. He has a good sense of the people around him. She knows of no professional complaints against BODMAN. His behavior in the workplace has always been respectful and appropriate. BODMAN strives on stress and when necessary communicates with a bullet style where one must get on the first go around. He is very aware of the lack of diversity on the highest levels of the corporate world. It has been difficult to find candidates of color but he has been more successful bringing women in. He is concerned about both issues.

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means. Part of her job was to pay his bills and he always paid them on time. She believes he has a housekeeper/valet, trainer who comes to the house and a driver. BODMAN is scrupulous about his expense accounts and money spent for which he asks for company reimbursement. He is highly honest regarding his finances in every regard.

To the best of

knowledge BODMAN has never

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used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved in any type of activity or situation which could be used b6 to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

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strongly recommended BODMAN for a position of trust with the US Government which would include access to <u>classified</u> material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge.

PROFESSIONAL ASSOCIATE

b6 The following investigation was conducted by Special on 4/11/01: b7C Aqent hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the b6 suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter b7C BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provision<u>s of the</u> Privacy Act of 1974 and did not request confidentiality thereafter provided the following information: b6 of Tax Administration at position is b7C the Cabot Corporation, Two Seaport Lane, Suite 1300, Boston MA, 02210, direct (617)342-6335. has known BODMAN since January of 1997, when BODMAN came to CABOT came to as President and knows him both b6 through business and social engagements. He sees BODMAN for the b7C past 3-4 years more than once per month. He reports to the CFO (Chief Financial Officer) who reports to BODMAN. states that he would rank 40th in the company. b6 would describe BODMAN as the kind of person who b7C promotes creativity. BODMAN can relate to very different classes of people. b6 stated that BODMAN exercises good judgement in b7C choosing those people he surrounds himself with and that these individuals have good standing in the professional community. b6 stated that BODMAN's reputation in the community b7C is very g<del>bou</del> To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would b6 deny any person their rights under the constitution on the basis b7c of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

BODMAN encourages diversity and deals swiftly with any b6 issues of bias. Sexual harassment is an area in which has b7c seen BODMAN take initiative.

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To the best of \_\_\_\_\_\_ knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN's professional character is very high. BODMAN emphasizes safety for workers and has pioneered a set of values that demand integrity and honesty on the part of the corporate behavior. The scientists in Cabot's Research and Development Offices were wasted before BODMAN came. As a chemical engineer BODMAN was able to give direction as what areas of research to pursue. BODMAN did not come in with his own staff but assessed the people in place and only replaced those who were not performing.

BODMAN is competent and fair. He watched when he came to Cabot and then made changes.

The IRS has its own offices at Cabot. BODMAN insists that what is done is honest and complete. Likes being in a position where if there is a question on a tax issue that BODMAN would rather let if be explored with the IRS fighting hard to put Cabot's position forward. There is never any allowance at Cabot for Cabot to put something in their return that is questionable or unclear because the IRS has not ruled on the issue and hope the IRS misses it.

When BODMAN is stressed he has the "count to ten" approach so that he never speaks in anger. Even when was called into BODMAN's office because something needed to be rectified he left feeling that the criticism had been constructive and BODMAN took the time to say that he hoped that the next meeting would be around better circumstances. Once a person was critisised by BODMAN and because he came up with a solution. BODMAN gave him a commendation. This kind of thing ь7С

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really raises moral and makes people trust the critisism and give their best.

BODMAN develops personnel and makes them better but he is able to terminate people he has hired but misjudged. There was a CFO who was disrespectful to others and who was asked to leave.

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge. b6 b7С

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# PROFESSIONAL ASSOCIATE

The following investigation was conducted by Special b Agent on 4/11/01:	6 7C
Advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants	
of Management and Acquisitions at the CABOT Corporation, Two Seaport Lane, Suite 1300, Boston MA 02210, (617)342-6281.	b6 b7C
has known BODMAN for ten years. Currently, interacts with BODMAN on a daily basis and previously on a daily basis. s role has included representing the company to Wall Street and illustrating its capable management.	b6 b7С
would describe BODMAN as a very traditional person of very high integrity. As CEO, he is first and foremost concerned with the safety and the health of those he works with, the customers and the other employees. Some of their business is inherently dangerous. When under stress, BODMAN is calm and cool. He is both intuitive and analytical when things break down and can identify the critical paths even in the last hours of a crisis. He seems to thrive on pressure and has very good stamina. BODMAN is good at soliciting opinions.	Ъ6 Ъ7С
stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.	
I Istated that BODMAN's reputation in the	b6 b7С
To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis	Ъ6 Ъ7С

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of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

BODMAN makes his judgments based on a person's experience. In India, BODMAN's own experience is dated. The method of choosing personnel for various is positions in foreign counties is determined by the perception of how a country works. An individual was chosen to lead this company because he was well connected and experienced in the politics of the region. India has problems with corruption and that is not in keeping with Cabot's standards as set by BODMAN. BODMAN was able to accept criticism of his choice of this person based on the fact that this person was checking other peoples ethnic background. The person had made comments that in certain villages people didn't know who their father's where. Ultimately, BODMAN disassociated himself from this person. This showed that BODMAN can listen and be self critical. Cabot only owned sixty percent of this company.

To the best of knowledge, BODMAN has never associated with any organizations or movements which b6 advocate the use of force to overthrow the United States b7C government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to BODMAN's contacts were always in the scope of his work and he was never out of touch with the company.

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. has never seen BODMAN drunk. BODMAN has never been involved in any fighting, spousal or child abuse. b6 b7С

As far as knows, BODMAN has never been b6 involved in any type of activity or situation which could be used b7c to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a positionb6of trust with the US Government which would include access tob7cclassified material and access to national security information.b7cadvised that the answers to the above questions weretrue and complete to the best of his knowledge.

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# PROFESSIONAL ASSOCIATE

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The following investigation was conducted by Special Agent on 4/13/01:	Ь6 Ь7С
hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information:	Ъ6 Ъ7С
of Corporate Affairs, Cabot Corporation, Two Seaport Lane, Suite 1300, Boston MA 02210. (617)342-6221. She manages Public Relations, Media Relations and internal/external communications. Previously she worked as Safety and Health manager. She advised that her decision making in this area was easy because she knew BODMAN would always support doing the right thing.	Ъ6 Ъ7С
has known BODMAN for about 20 years.	
would describe BODMAN as having the highest integrity. She stated he has a gentle mentoring style and sets a good public example his public leadership. He coaches his managers and teaches them in a way where they did not lose face. BODMAN has worked very hard to get women into management. Advised she was the first one and that there are now three others in the higher ranks. The company's culture is now built on human relations and the whole person. People are expected to have integrity in their personal lives. The company's culture is consistent. BODMAN is responsible for this.	Ъ6 Ъ7С
During BODMAN's divorce, the allegations were such that the Board felt that an independent investigator should be used by them to determine if there had been any improprieties.	
stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.	Ь6 Ь7С
stated that BODMAN's reputation in the	

b6

company is very high. She has never heard of any complaints against him, either professional or otherwise to include both informal and formal complaints.

2

During his divorce, BODMAN's now ex-wife began to make public statements against him that were heard by Cabot employees. His ex-wife alleged that he misused Cabot funds, that he used a debt situation between Cabot and Algeria as it related to Cabot's in Liquid Natural Gas. The Board felt it was compelled to investigate this and hired an independent investigator. thinks the investigator was a local retired judge. In

the end nothing improper was found.

To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

has never exhibited any type of financial irresponsibility or appeared to live above his means. Some countries function on bribes and kickbacks. Even if this is the common practice Cabot, under BODMAN's leadership, has a clear policy of not tolerating this.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse. b6 b7С

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As far as knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to b6 classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of her knowledge.

#### PROFESSIONAL ASSOCIATE

1

**b6** The following investigation was conducted by Special b7C on 4/11/01: Agent hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and b6 current information is available and obtained concerning the b7C suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants.  $\neg$  was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. \_\_\_\_\_ thereafter provided the following information: is the General h6 Manager for Carbon Black, Cabot Corporation, Two Seaport Lane b7C Suite 1300, Boston Ma 02210. CARBON black is a substance which is added to many things such as ink and rubber to make them better or make them last longer. This is an area which exists because of BODMAN's direction of the Research and development staff. It is a very important product of Cabot's. has known BODMAN for ten years. b6 interacts with BODMAN several times per day. BODMAN has b7C generated financial results for the company because of his staffing and leadership ability. stated that BODMAN is one of the finest and smartest individuals he has ever met and stated that BODMAN is unwavering in his principles. stated that he has a deep admiration for him and would do anything for him. They do not socialize as BODMAN is on a different social level and they have little in common. stated that BODMAN has wonderful leadership **b**6 qualities and fantastic judgement about people. People follow him as a leader rather than as a manager. BODMAN gives others a b7C lot of respect. was there before BODMAN got there and noted that at first he was very intimidating and an unknown It became clear, however that BODMAN moves well in commodity. different levels of society and has the experience to move in several crowds. He empathizes with others. With regards to stress and pressure BODMAN is very level. He does not tolerate unoriginal mistakes or put another way if you make the same mistake twice he will not be patient.

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Overall he has a calming influence in stressful situations, having the 'this too will pass' attitude.

choosing those people he surrounds himself with and that these individuals have good standing in the professional community.

community is very good.

To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class. BODMAN is proactive in that regard and that he does not tolerate inappropriate comments.

BODMAN is an advocate of diversity and tries to choose advisors and board members who are beyond prejudice. The international higher level staff is often western educated, international world citizens. His reaction is instant to discrimination oversees and believes that BODMAN pushes the envelope in asking their business interests in other countries to maintain a policy of non-discrimination regardless of the local culture. Once when there was a problem in India and pelieves that a President of a company was fired for discriminating.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to described BODMAN as a patriot.

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

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knowledge BODMAN has never To the best of used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

b6 As far as knows, BODMAN has never been involved Ъ7С in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge.

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PROFESSIONAL ASSOCIATE

The following investigation was conducted by Special b6 on 4/11/01: Agent b7C hereafter was advised of the official identity of the interviewing Agent and the purpose of **b**6 the interview, that being to ensure complete, accurate and b7C current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information: b6 s the to BODMAN at Cabot b7C Corporation Two Seaport Lane, Boston MA 02210. (617)342-6066. **h**6 has known BODMAN has been his assistant for b7C several months. She came to Cabot in 1990 and has known him somewhat since then. would describe BODMAN very hard working and as arriving 7 AM each day. advised that BODMAN is very bright b6 and that he has done many good things for the company and that he b7C has demonstrated excellent leadership. When he announced his retirement he received many heartfelt letters which were more. than the standard letters usually received by retiring CEO's. BODMAN has a high degree of thoroughness and attention to detail. advised that she can tell when he is aqitated and under pressure but that no one else can. He juggles activities and personalities and successfully mediates situations and conflicts. knows of no complaints or negative information of any kind. She advised he treats people with respect. b6 stated that BODMAN exercises good judgement in b7C choosing those people he surrounds himself with and that these individuals have good standing in the professional community. b6 stated that BODMAN's reputation in the community b7C is very good. b6 To the best of knowledge, BODMAN has never b7C associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis

of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, b6 purchase, transportation or distribution. BODMAN has never b7 abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge.

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PROFESSIONAL ASSOCIATE

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b6The following investigation was conducted by Specialb7cAgenton 4/16/01:

hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information:

			b6
works at the Research			b7C
Billerica Ma 01821. (	(978)670-6112. His h	home address is	

has known BODMAN since 1956 when they went to the Chemical Engineering program as Cornell in 1956. Their class started off at 150 students. Only 50 students were able to complete it. They both went on to MIT together. There were three of them that went through Cornell and MIT together. It was a nine-year process. BODMAN was first in his class at Cornell. He was competitive and believed in being the best. He enjoyed playing tennis and baseball. His future first wife was a nationally ranked tennis player. BODMAN was never "hyper social," always just a nice guy. They were in each other's weddings. BODMAN has an ironic sense of humor and a bit of a temper. Because he is so pale, he gets redder when frustrated and this was always a good barometer for anyone who knows him.

would describe BODMAN as very focused and intelligent. \_\_\_\_\_\_ called him "trustworthy to the nth degree." BODMAN has an extraordinary ability to talk about information and to repackage it in a way that a wide variety of people are reached. BODMAN cares about and believes in doing the right thing. There is a moral context to his thinking.

BODMAN has, single-handedly, changed Cabot from an energy commodities company into a multi national business corporation.

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\_\_\_\_\_\_ stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community. \_\_\_\_\_\_ advised that BODMAN handles stress and pressure well relying on close friends.

The divorce which occurred between BODMAN and his second wife was very stressful for him. His ex-wife had a "four hour session" with \_\_\_\_\_\_ and his wife at the Ritz-Carlton in which she accused BODMAN of having provided favors to his third wife. The second wife alleged that the third wife had engineered the breakup through her access to BODMAN's son, and some difficulties he was having. The second wife alleged that BODMAN had provided material favors to the third wife. \_\_\_\_\_\_ advised that the second wife could not accept that sometimes two people weren't meant to b together.

stated that BODMAN's reputation in the community b6 b7C

To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class. It is important to BODMAN to be on guard against any stereotyping of individuals.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN's professional character is outstanding. In Cabot's operations in CHINA, he had a good relationship with the former mayor of Shanghai and was able to build an understanding in Shanghai of the importance of capital and profit. As a result

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he was able to attract "untypical" Chinese. They were untypical in that they did not value the collective support of the state company but instead were more free enterprise minded, looking toward the future.

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used b6 illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge. b6 b7С

The following investigation was conducted by Special b6 Aqent b7C On April 5, 2001, at Fidelity Employer Services, Inc., Fidelity Investments, 1 Spartan Way, Merrimac New Hampshire 03054 was contacted regarding the personnel records of Samuel BODMAN. He was provided with a consent to release information form signed by b6 BODMAN and advised that BODMAN was being considered of a b7C presidential appointment necessitating the verifications of his employment and the review of his personnel <u>file.</u> BODMAN's dates of employment and position were provided to advised that an employment ending so long ago b6 would require records to be obtained from archives and ordered a b7C search to locate the correct box numbers so that those boxes could be shipped to NH for search by On 4/25/01, advised that some of the relevant boxes had been located and had been received at NH on 4/25/01. Other, possibly relevant, boxes had not been found. searched the boxes delivered and provided his **b6** results on 4/27/01: No personnel records of any kind could be b7C found. The storage company could not find any records prior to 1/87. No records for 1/87 or later contained any information at all.

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# PROFESSIONAL ASSOCIATE

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the interview, that being to ensure complete, accurate and	56 57C
pf Fidelity Corp., 82 Devonshire St. Boston MA (617)563-6971 and was a contemporary of BODMAN's when BODMAN was at Fidelity. was interviewed from his home in Florida at	b6 b7С
has known BODMAN for since 1982 when was the of Human Resources and Administration. In that position he saw BODMAN several times per day.	_ b6 _ b7C
would describe BODMAN as outstanding and easy going with a serious attitude and good stamina. BODMAN was a fair person, according to , and bent over backwards to reach out to all types of people and got them to perform. When someone didn't work out, he was able to make the decision to dismiss them.	Ь6 Ь7С
stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.	Ъ6 Ъ7С
stated that BODMAN's reputation in the community is very good. knows of no complaints against BODMAN of any kind, either formal or informal. This would include professional ethics, harassment, conflict of interest or expense account related matters.	Ъ6 Ъ7С
To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis	b6 b7С

of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved b6 in any type of activity or situation which could be used to b7C coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge. b6 b7С

PROFESSIONAL ASSOCIATE

1

The following investigation was conducted by Special b6 on 4/21/01: Agent b7C hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the b6 suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter b7C BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information: b6 of Fidelity b7C Investments, 82 Devonshire St., Boston MA (617) 563-8450. has known BODMAN for 20 years. BODMAN began at Fidelity in the Venture Capital area of Fidelity. BODMAN began in the Venture Capitol Area which is run as a separate division of the company, and was there from about 1979 until 1980. During that time interacted with BODMAN .b6 a couple of times per week. For the last 4-6 years of BODMAN's b7C

time at Fidelity, BODMAN was COO of the Fidelity Management Corp. while was CEO. During that time they saw each other several times per day and traveled together on some domestic business trips. Other than a very bad divorce, which does not know much about, does not know of any personal or professional complaints of any type against BODMAN to include sexual harassment, professional ethics or breaches o fiduciary trust.

While working in the Venture Capitol Area, BODMAN did very well. The compensation for these individuals is partially determined by the percentage of profit they create, i.e., it is formula driven. BODMAN was described as being among the top 15 people in that field.

stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community. described BODMAN's ability as average to above average in choosing personnel. When BODMAN became of COO it was a major

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transition for him and a learning experience as well as an enormous step up

BODMAN had to develop a new set of skills related to decision making and interpersonal skills. Sometimes BODMAN would choose personnel well and sometimes he would not have judged skill level correctly, but he continued to learn and improve **b6** until he left for Cabot where he has had an outstanding **b7C** performance from everything has heard.

community is very good.

To the best of knowledge, BODMAN has never b6 associated himself with any organizations whose policies would b7C deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of \_\_\_\_\_\_ knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means and is tight (not careless) with his finances.

> As far as knows, BODMAN has never been involved **b6 b7C**

b6 b7С

in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to <u>classified material and access to national security information</u>. advised that the answers to the above questions were true and complete to the best of his knowledge.

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#### REFERENCE

1

b6 The following investigation was conducted by Special b7C on 4/16/01: Agent hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and b6 current information is available and obtained concerning the b7C suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information: **b**6 work address is Allmerica Financial, 440 b7C Lincoln St. Worcester MA 01653, (508)855-4000. His home address is has known BODMAN since 1970. They met at Fidelity where they worked together until 1989. BODMAN was President of the Holding Company Fidelity. was President of Fidelity Management and Research. b6 reported to BODMAN. b7C At fidelity they saw each other three or four times per week. After Fidelity, they saw each other every two to three months socially. was appointed to the Board of Cabot as the Chairman of the Audit Committee. The Board meets six times per year and there is a dinner before the Board meeting. Their families and wives know eachother. BODMAN and also traveled to Argentina each year for the last six years to fish. stated that BODMAN's character is straight forward, honest and blunt. BODMAN handles pressure and stress b6 Cabot is a difficult business to manage from a profit well. b7C standpoint. Cabot had significant problems when BODMAN came.

BODMAN had a very good effect on Cabot. Cabot, at its inception, was a company of 60 people. It has grown to a company of 30,000. BODMAN is responsible for a good amount of this growth. During the divorce BODMAN's wife made allegations which

caused BODMAN to suggest that the Board look into them fully. BODMAN advised them to request an interview with his former wife and they did. She did not want to pursue the allegations with the company. A retired Judge named Tyler investigated for Cabot and found no support.

choosing those people he surrounds himself with and that these b7c individuals have good standing in the professional community.

is very good. stated that BODMAN's reputation in the community b6 b7c

To the best of \_\_\_\_\_\_ knowledge, BODMAN has never associated himself with any organizations whose policies would bf deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

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To the best of knowledge, BODMAN has never bassociated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to be

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means. knows of no complaints of any kind against BODMAN

To the best of knowledge BODMAN has never used b6 illegal drugs or been involved in anyway with their sale, b7c purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved b6 in any type of activity or situation which could be used to b7c coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to b6 classified material and access to national security information. b7C advised that the answers to the above questions were true and complete to the best of his knowledge.

### REFERENCE

<u> </u>	b6 b7С
of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality.	Ъ6 Ъ7С
provided the following information: Managing Corporation, a private equity and investment firm located at One Federal Street, Boston MA 02109. home	Ь6 Ь70
address is and his home ph ishas been on the board of the the Cabot Corporation since 1992. (Board meets six times per year.)	
has known BODMAN for eighteen years. They were on the same Board together at Dymo Business Systems, (DBS) in Randolph MA. They met monthly. They were at DBS to represent Fidelity's interests.	b6 b7С
would describe BODMAN as a sophistcated	b6

manager who is straight forward and not ostentatious. BODMAN b70 makes great efforts to promote diversity and give opportunity to women.

BODMAN has a very high level of energy and recently hired a trainor to help him lose weight. BODMAN handles stress well because when things start getting difficult BODMAN does not get exited. also described BODMAN as discreet.

BODMAN has shown great vision in taking Cabot down a path that most companies would not go down because of financial issues. BODMAN's decision to invest in research and development developed new products. Cabot is now a diversified company instead of a commodities based company. BODMAN sold off companies that were not profitable. The stock holders have been very happy with his performance and within the company, others

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### speak very highly of him.

in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to advised that BODMAN owns a home in the Bahamas.

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been b6 involved in any type of activity or situation which could be used b7C to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

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strongly recommended BODMAN for a position of trust with the US Government which would include access to b classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge.

PROFESSIONAL ASSOCIATE

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The following investigation was conducted by Special b6 on 4/12/01: Agent b7C hereafter Cabot, was advised of the official identity of the interviewing Agent and the purpose of b6 the interview, that being to ensure complete, accurate and b7C current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. Cabot thereafter provided the following information: is on the Board of Directors for the Cabot **b**6 Corporation and a member of the founding family. His point of b7C contact is was asked to comment on the report provided by Judge Tyler, (retired) which was provided to the board during b6 BODMAN's divorce on the allegations being made by BODMAN's exb7C advised that all the charges disappeared under wife. scrutiny. BODMAN encouraged the board to have an independent investigator such as was chosen look into the allegations. b6 would describe BODMAN as having excellent b7C abilities and energy and good integrity. To the best of knowledge BODMAN has never used b6 illegal drugs or been involved in anyway with their sale, Ъ7C purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. b6 As far as knows, BODMAN has never been involved b7C in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility. strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true

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and complete to the best of his knowledge.

# REFERENCE

The following investigation was conducted by Special Agentn 4/23/01:	b6 b7С
hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information:	Ь6 Ь7С
Soldiers Field Rd., Fowler House, Boston MA 02163, (617)358-4631. His home address is	b6 b7С
has known BODMAN for about 25 years. They first met because was coming to Fidelity from Harvard to either search out jobs for the Harvard graduates or raise funds for programs. Five years later they were seeing each other at various parties around Boston. BODMAN became part of the Visiting Committee at Harvard. This group meets several times per year and is not compensated. The group would evaluate the Dean and what was going on at the school. This was reported to the trustees.	Ъ6 Ъ7С
would describe BODMAN as a person of integrity. stated that he respected the fact that BODMAN never spoke negatively of his soon to be ex-wife. was advised that he was deposed for several days in the divorce proceeding and asked why Harvard did not grant tenure to BODMAN's soon to be ex-wife.	b6 b7С
stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.	b6 b7C
b6 b6 community is very good.	C .
To the best ofknowledge, BODMAN has never	Ъ6 Ъ7С

associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports b6 our constituted form of government of the United States and does b7C not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

described BODMAN as a star, with an excellent professional character. He creates a congenial atmosphere and keeps his own stress inside while he thinks about the situation. The only way one can tell is that, since BODMAN is so pale, he gets very red.

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Because of BODMAN's leadership, Cabot now has the highest return of any chemical company. BODMAN changed it from a commodities company to a high tech company. He saved the company, which was on its way out. BODMAN is very tough minded and sets high standards for himself and others. BODMAN is respected by others for this.

BODMAN understood the science of Cabot's research and development. Cabot produces Carbo black by burning sludge. However, the crystals produced in this process, varied greatly in value. BODMAN learned that in the "art" of producing Carbon black crystals no one understood the chemistry behind why different qualities of crystals were produced. BODMAN started research to develop this understanding and greatly increased the profit of this production, since high quality crystal production is now an understood process.

BODMAN has been outspoken about things that aren't right and handled well the fact that three former CEO's were on Cabot's Board of Trustees. There have never been any formal or informal

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professional complaints against BODMAN as far as	knows.	b6
		b7C
BODMAN has never exhibited any type of financia	1	
irresponsibility or appeared to live above his means.		

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, b6 purchase, transportation or distribution. BODMAN has never b7C abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been b6 involved in any type of activity or situation which could be used b7c to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge.

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## PROFESSIONAL ASSOCIATE

The following investigation was conducted by special	b6 b7С
hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information:	
of MIT where BODMAN is a Trustee on the Executive Committee and the Investment Committee.	b6 b7С
has known BODMAN for ten and a half years. They meet one time per month.	b6 b7С
would describe BODMAN as a real "Eagle Scout", a wonderful person and as hard working. He has been a consistent, methodical and as possessing a core set of values. A has been on the other side of an issue than BODMAN and has interacted with him under that type of stress. A has never seen him unhappy with a firm jaw but has never seen him explode. BODMAN proposed major reorganization striking a balance between the fiduciary responsibility and rebuilding the career track to create a better situation for the Professors.	1
stated that BODMAN exercises good judgement in choosing those people he surrounds himself with and that these individuals have good standing in the professional community.	Ъ6 Ъ7С
stated that BODMAN's reputation in the community is very good.	b6 b7С
To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition, BODMAN has never exhibited any signs or expressed any opinions which would	Ь6 Ь7С

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indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of knowledge, BODMAN has never associated with any orga<del>nizatio</del>ns or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

**b**6 knows, BODMAN has never been involved in As far as b7C any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge.

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#### PROFESSIONAL ASSOCIATE

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b6 The following investigation was conducted by Special b7C on 4/10/01: Agent , hereafter was advised of the official identity of the interviewing Agent and the purpose of b6 the interview, that being to ensure complete, accurate and b7C current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and waived confidentiality. thereafter provided the following information: resides at b6 his work address is 238 Main St., Cambridge MA b7C 02143, (617)253-3333. is the at MIT and serves as an ex officio member on the Board of Trustees. has been an ex officio member of the Board for more than zo years. s known BODMAN for more than 10 years, through b6 BODMAN, like all ex officio members, receives activities at MIT. b7C no compensation. There are 75 people on the Board and they meet four times per year. They operate through standing sub committees and the boards actions are limited by the articles and by laws of MIT. BODMAN was a Chairman while was BODMAN was the Trustee with whom BODMAN had the greatest amount of contact.

The governing board of MIT has permanent committees such as the Executive committee. The Executive Committee meets monthly. It is concerned with policy and procedure rather than being operational. BODMAN was appointed to the Executive Committee in 1990. Was on the Executive Committee with BODMAN for the last two years, the same time that BODMAN was the Chairman of Investments. Throughout his trusteeship at MIT BODMAN had a decision and policy making role. The executive has seven regular members (employees) and three ex officio members, the Chairman, President and the Treasurer. The responsibilities of this committee include recommending those people who will serve as officers in the corporation and be appointed to senior positions within the University, approves faculty, and deals with tuition and budget.

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BODMAN was a member of the Corporation since 1985. He was then reappointed for life (until age 75). This is not a usual pattern and is indicative of how much BODMAN's investment and financial expertise is valued. From 1994 to the present he was in the Investment Committee.

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stated that he was unhappy to be losing BODMAN but feels that he is an outstanding individual. He described BODMAN as honest and direct and that one always knew where he stood. He did not tolerate anything but a straight answer. BODMAN was described as having an excellent memory and is someone who always does his homework. BODMAN manages his time well and manages stress well. BODMAN is polite and has never heard him raise his voice. stated he had occasion to be in situations where he was in severe disagreement with BODMAN and that things remained professional. BODMAN's character as outstanding and advised he was well regarded by charitable institutions.

choosing those people he surrounds himself with and that these b7c individuals have good standing in the professional community.

community is very high.

stated that, as far as he knows, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class. MIT does not discriminate against any class of citizen to include: race, religion, national origin, disability, ethnic origin, age, sexual orientation or gender.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved in the use of terrorism, espionage or sabotage. BODMAN supports the constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United Stated, BODMAN has never indicated that he is being directed by any foreign or criminal b6 b7С

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element to seek employment with the United States Government. As far as knows, BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

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BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of \_\_\_\_\_\_ knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. \_\_\_\_\_\_ stated that he really had no idea as to whether BODMAN had any experiences with drugs. \_\_\_\_\_\_ stated that he had never seen any evidence that BODMAN had problems with prescription drugs or alcohol. \_\_\_\_\_\_ has never seen BODMAN drunk.

As knows, BODMAN has never been involved in any b6 type of activity or situation which could be used to coerce, b7c influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

As far as knows, there have never been any kind b6 of professional or personal complaints against BODMAN.

strongly recommended BODMAN for a position of trust with the US Government which would include access to <u>classified material and access to national security information</u>. Advised that the answers to the above questions were true and complete to the best of his knowledge.

PROFESSIONAL ASSOCIATE

1

The following investigation was conducted by Special on 4/12/01: Aqent

hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and b6 current information is available and obtained concerning the b7C suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information:

of Century Realty Company Inc., (no b6 relation to Century 21) 1430 Mass Ave. Boston MA 02135. (617)576-3200. (home number

has known BODMAN for 30 years because they were neighbors years ago. \_\_\_\_\_is from Texas. Their contact was **b6** b7C frequent and they grew to be close. eventually formed his own real estate company and provided real estate consulting to Fidelity over a 25 year period.

would describe BODMAN as a big picture kind of b6 BODMAN possesses integrity, loyalty and person. would b7C choose him to be at his side in any problem situation. BODMAN is not an emotional or provocative person. They have see<u>n each</u> other once per week over the next four to five years. has done real estate for Cabot as an independent contractor for the last 10-12 years.

stated that BODMAN exercises good judgement in b6 choosing those people he surrounds himself with and that these b7C individuals have good standing in the professional community.

stated that BODMAN's reputation in the community advised that BODMAN is not slick but very is very good. **b6** meditative and considers things before giving an answer. BODMAN 'b7c has only a few close friends that are not based on business. One of those friends is

was not happy about his divorce and the divorce was very generous to his ex wife.

b6 b7C To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.

To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used b6 illegal drugs or been involved in anyway with their sale, b7C purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility. BODMAN is healthy and the only medical situation he could remember was some shoulder surgery. \_\_\_\_\_ knows of no complaints of any kind, professional or otherwise, formal or informal.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge. b6 b7С

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## NEIGHBOR

The following investigation was conducted by Special Agent on 4/13/01:	b6 b7С
hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and current information is available and obtained concerning the suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality thereafter provided the following information:	b6 b7С
s a retired Judge and has been BODMAN's neighbor since the fall of 1995 or winter of 1996. They do not socialize but are very friendly. There are no other units on that floor besides and BODMAN's double unit which is either This is a <b>b6</b>	Ъ6 Ъ7С
would describe BODMAN as very friendly. b7C To the best of knowledge, BODMAN has never associated himself with any organizations whose policies would deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class.	
To the best of knowledge, BODMAN has never associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties with individuals residing in foreign countries or with foreign nationals as far as is known to	

BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of \_\_\_\_\_\_ knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

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As far as knows, BODMAN has never been involved b6 in any type of activity or situation which could be used to b7c coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BODMAN for a position of trust with the US Government which would include access to classified material and access to national security information. b7c advised that the answers to the above questions were true and complete to the best of his knowledge.

#### PROFESSIONAL ASSOCIATE

b6 The following investigation was conducted by Special b7C Agent on 4/11/01: hereafter was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to ensure complete, accurate and **b6** current information is available and obtained concerning the b7C suitability of the appointee, SAMUEL WRIGHT BODMAN III, hereafter BODMAN, who is being considered for a Presidential Appointment, in light of the security concerns that this position warrants. was advised of the provisions of the Privacy Act of 1974 and did not request confidentiality. thereafter provided the following information: is BODMAN's He also does extra things for is paid by CABOT but received a cash Christmas BODMAN. **b**6 present each year. His home address b7C His home phone number is does not travel abroad with BODMAN. b6 has known BODMAN for 15 years. b7C would describe BODMAN as having the highest b6 character and as being an honest and ethical man. stated b7C that BODMAN works 16 hour days and that he seems very healthy. stated that BODMAN exercises good judgement in **b6** choosing those people he surrounds himself with and that these b7C individuals have good standing in the professional community. stated that BODMAN's reputation in the community **b**6 b7C is very good. knowledge, BODMAN has never To the best of associated himself with any organizations whose policies would b6 b7C deny any person their rights under the constitution on the basis of gender, race, religion, national origin, sexual orientation, disability, age or any other class. In addition BODMAN has never exhibited any signs or expressed any opinions which would indicate that he harbors any personal biases against any group of citizens or aforementioned class. He stated that BODMAN has an open mind and does not make off color ethnic jokes, **b6** To the best of knowledge, BODMAN has never b7C

associated with any organizations or movements which advocate the use of force to overthrow the United States government or who are involved with terrorism, espionage or sabotage. BODMAN supports our constituted form of government of the United States and does not support other forms of government whose interests may be inimical to the United States. BODMAN has never indicated that he is being directed by any foreign or criminal element to seek employment with the United States Government. BODMAN has no financial or property interests abroad or close personal ties b6 with individuals residing in foreign countries or with foreign b7C nationals as far as is known to All BODMAN's foreign contacts appear to be business related.

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BODMAN has never exhibited any type of financial irresponsibility or appeared to live above his means.

To the best of knowledge BODMAN has never used illegal drugs or been involved in anyway with their sale, purchase, transportation or distribution. BODMAN has never abused prescription drugs or alcohol and has never undergone any type of substance abuse rehabilitation. BODMAN has never been involved in any fighting, spousal or child abuse.

As far as knows, BODMAN has never been involved in any type of activity or situation which could be used to coerce, influence or pressure or have an adverse impact on BODMAN's judgement, stability, discretion, trustworthiness or responsibility.

strongly recommended BOLMAN for a position of trust with the US Government which would include access to classified material and access to national security information. advised that the answers to the above questions were true and complete to the best of his knowledge. .

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The following investigation was conducted by Special Agent \_\_\_\_\_\_ over several weeks concluding on 6/5/01. This document is being prepared on 6/8/01.

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The Massachusetts Committee Against Discrimination (MCAD) provided access to its records concerning the case v. Cabot Corporation. The records contained affidavits, testimony, filings and final disposition of several thousand pages. Cabot has sought review. The decision as to whether review will take place has not been made per Cabot Corp.

Testimony and affidavits were reviewed to the extent possible in the time available. The goal of the review was to locate information which:

(1) Indicated the complainants belief that candidate, CEO of Cabot Corp., or his policies or practices were discriminatory against women or whether he condoned or participated in sexual harassment. (The merits of the case are not of relevance to this goal.)

(2) Determined the candidate's level of awareness of the allegations relating to him or his policies or practices in light of the fact that candidate did not reveal any awareness of the case or its complaints during his interview with writer, or on his SF 86 or its supplements.

Two additional pieces of information should be noted:

(1) Two of the witnesses who gave testimony were interviewed as fellow employees in the employment check. \_\_\_\_\_\_. Both were queried as to their knowledge of any official or unofficial complaints against candidate regarding any aspect of sexual harassment and discrimination, neither mentioned this case.

(2) Candidate revealed that he was a witness in the case to the <u>White House</u>. Documentation to this effect was provided by to writer on 6/7/01 after speaking with the candidate about his interview by the writer on 6/6/01. This was reported to FBIHQ on 6/7/01. Candidate did not refer to the affidavits against him for inappropriate touching.

Previously provided were one on point affidavit by and the disposition of the case. Enclosed here are one on point affidavit by and the portions of testimony found to date which provide

information as to the complainant's allegations. The disposition and affidavits stand on their own, the testimony is summarized below. It should be noted that all the testimony has not been reviewed by writer and that some of the affidavits have not been read. The rebuttals to the testimony are not presented since the goal is not to determine the merits of the case, just what was alleged in an attempt to determine what allegations the candidate was aware of at the time of his interview by writer.

The affidavits refer to unwelcome touching by candidate. The disposition shows damages awarded for emotional distress and for unequal pay based on gender. There was no finding of sexual harassment or discrimination.

The attached transcripts are copies of certain pages with sections of those pages marked as relevant. Some of those marked sections are briefly summarized below:

Volume 1 pg 189

who was hired by Cabot to help with her presentation and describes that consultant's instructions to her which concerned	be
	b7
pg 192	
The consultant advisedthat Cabot is both sexist and racist.	
Volume 2 pg 9,10,11	·
asked to attend, which was preceded by a questionnaire which asked if	b6 b7С
pg 21	
was asked to	l

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Candidate advised that he viewed as somewhat ineffective as a lawyer and that he was attempting to bring up women talent. He was not questioned specifically about her allegations. Candidate (Vol 11 pg 145) testifies that he was advised of the complaints of and told he needed to be careful about touching people.

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
FOI/PA# 1419042-0
Total Deleted Page(s) = 45
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(12/31/1995).

## FEDERAL BUREAU OF INVESTIGATION

Precedence: DEADLINE 04/17/2001 (PAST) Date	e: 06/12/2001
To: Boston	
From: Administrative Services Special Inquiry and General Background Inve Unit (SIGBIU), Room 4371 Contact: PSS Extension 47	-
Approved By: Drafted By:	b6 b7C
<b>Case ID #:</b> 161B-HQ-1337020 (Pending)	
Title: SAMUEL WRIGHT BODMAN, III LEVEL II-PAS	
<b>Synopsis:</b> Additional background investigation (BI) or candidate.	1 captioned
Administrative: BUDED is PAST. Submit results by noc	on 6/13/2001.
Direct results/questions to PSS FBIHQ, Room 4371, Ext. 4755.	SIGBIU, b6 b7C
Details: A review of the Suffolk County Probate and B Boston, Massachusetts, indicated that Mr. Bodman's for alleged that Mr. Bodman was verbally abusive toward b he was involved in a romantic affair with another wom records also contained information that Mr. Bodman's spouse alleged one incident of physical abuse.	ormer spouse her and that han. The
During this investigation several individual that during Mr. Bodman's divorce from she alleged that Mr. Bodman misused Cabot funds and m arrangements through Cabot Corporation for his own ad Whereas the chairman of Cabot Board of Directors hire	b6 hade business b7C lvantage.

Whereas the chairman of Cabot Board of Directors hired an independent investigator to investigate Mr. Bodman's former spouse's allegations related to Cabot. An individual stated that a sexual harassment suit was filed against Mr. Bodman with the Massachusetts Commission Against Discrimination.

Also, during this investigation an individual alleged that Mr. Bodman invested with another individual who formed the Bank of Credit and Commerce International (BCCI). (BCCI was the subject of one of the largest bank fraud investigations ever prosecuted).

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Also, that Mr. Bodman took Prozac, an antidepressant, and attended Alcoholic Anonymous meetings on the direction of a psychiatrist that was treating his son. This individual alleged that

Mr. Bodman was a daily drinker of hard liquor and wine.

LEAD(s):

Set Lead 1:

BOSTON

#### AT BOSTON, MA

Recontact Mr. Bodman and discuss with him the alleged verbally and physical abuse and his involvement in a romantic affair with another woman which was revealed during the review of the Suffolk County Probate and Family Court records.

Obtain Mr. Bodman comments on the public allegations of improprieties by his former spouse that he misused Cabot funds. Also, his comments on his investment with another individual who formed the Bank of Credit and Commerce International.

Discuss and obtain Mr. Bodman comments regarding the sexual harassment suit which was filed with the Massachusetts Commission Against Discrimination against Cabot Corporation while he was Chief Executive Officer. Determine why he did not indicate it on his Supplement to his SF-86.

During the reinterview, if he ever received counseling. If so, determine the dates, type of counseling, etc occurred during the scope of this investigation. If counseling was received, determine why he did not list this on his SF-86 and obtain his comments.

Discuss and obtain his comments regarding his alleged alcohol abuse and use of Prozac.

Discuss any additional residences (vacation or otherwise) not indicated on his Supplement or SF-86.

CC: 1 - PSS

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**U.S. Department of Justice** 

Federal Bureau of Investigation

Washington, D. C. 20535-0001

# JUN 1 3 2001

BY COURIER

Honorable Alberto R. Gonzales Counsel to the President The White House Washington, D.C.

Dear Mr. Gonzales:

Reference is made to my letter to your office dated May 22, 2001, which furnished the partial results of a Level II background investigation concerning Mr. Samuel Wright Bodman III. Enclosed is a summary memorandum containing the partial results of additional investigation concerning this matter, along with a copy of an interview providing details of information contained in this summary memorandum.

The names and identifying data have been excised from enclosed interview in order to protect their identities in the event there is a need to interview them in the future and they request confidentiality. No change is made to the substance of the interview.

Your office will be advised when additional **b6** investigation has been completed. Should you have any questions, b7C they may be directed to Supervisory Personnel Security Specialist (SPSS) or SPSS at telephone number 00 to 81610' Sincerely yours, **b6** b7C - Josef 8 2/01 Chief Dep. Dir Special Inquiry and General Chief of Staf Background Investigations Unit Off. of Gen Counsel (2)Asst. Dir Admin.Ser BGK Dissem. to: D.O. Crim. Inv. CJIS PÀRTIAL Dissem. on: 1 Finance Info. Res 1Э Reg. Rec'd. Insp. Lab Dissem. by:\_KA National Sec. OPR Off. of Public Return to Room 4371 b7C 1xc to USSS / arms Reach Program 10/22/01 Nr 10/9/2001 FBUDOJ 4/rads/ma & Cong. Affs.\_ Training Off. of EEOA MAIL ROOM Director's Office



#### Honorable Alberto R. Gonzales

NOTE: Judge Harold R. Tyler the independent investigator who investigated the allegation of harassment against Mr. Bodman has no memory or records relating to the investigation. A complainant filed to the Commonwealth of Massachusetts Commission Against Discrimination, Boston, Massachusetts, against Cabot Corporation, was reviewed. \_\_\_\_\_\_\_ of Cabot Corporation stated that Mr. Bodman was not a witness, named officially, or referred except in his official capacity. \_\_\_\_\_\_\_ Topeka, Kansas, and Howard Blauvelt, Keswick, Virginia, advised they knew of no improprieties by Mr. Bodman.

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Investigation is complete, except for a reinterview of Mr. Bodman (BS).

_		Se	ent	to	the	White	House	е:	interview	dated	6/5	/01	of		b6
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	present	and	pro	vid	led :	signif	icant	ir	nformation	from	BS.	_			270

**U.S. Department of Justice** 

Federal Bureau of Investigation

Washington, D. C. 20535-0001

# JUN 1 3 2001!

SAMUEL WRIGHT BODMAN III

The information in this summary memorandum supplements the information contained in the summary memorandum dated May 22, 2001.

Additional investigation is being conducted.

#### <u>Interviews</u>

In the previous summary memorandum, information was reported that Mr. Bodman's former spouse made public allegations about Mr. Bodman that concerned his behavior in both his professional and personal lives. She alleged that Mr. Bodman misused Cabot Corporation funds and Cabot business arrangements to his own advantage. (Mr. Bodman is employed by Cabot Corporation, Boston, Massachusetts, as the President and Chief Executive Officer.) Information was provided by several Cabot employees that the former spouse's allegations were investigated by Judge Harold R. Tyler and two other persons, and Howard Blauvelt, were identified as persons who could comment concerning these allegations. Additionally, another individual provided the identities of three persons who could provide possibly unfavorable information concerning Mr. Bodman at Cabot Corporation and information concerning a sexual harassment complaint. (Refer to the FBI summary memorandum dated May 22, 2001, for details concerning the above.)

Topeka, Kansas, advised that he was the for the Cabot Corporation from 1991 to mid 1993 and that Mr. Bodman was the Chief Executive Officer/Chairman of Cabot Corporation during that time. stated that Mr. Bodman was one of many people that interviewed him for employment at the Cabot Corporation. stated that Mr. Bodman was a no-nonsense business person who was very driven. stated that Mr. Bodman came with a Massachusetts Institute of Technology business background, he had a "technical" Dep. Dir Chief of Staff bent to his style and that he met people well. stated Off. of Gen. Counsel that Mr. Bodman accomplished tasks on time and was somewhat cold. Asst. Dir. Admin.Ser. stated he did not build a personal relationship with Crim. Inv. Mr. Bodman while he worked for him because their styles and СЛЗ Financ personalities were so different. stated that Info. Res. Insp. -Mr. Bodman was extremely loyal to the Cabot Corporation, the National Sec. Board, and the shareholders and that his reputation was that of a OFR \_\_\_\_\_ bound and the billicher and the billic hard-nosed, driven executive, and his ability was very high. & Cong. Affs.\_\_\_\_\_ Training\_\_\_\_\_\_ Pff. Pf\_EEQA\_\_\_\_

PH:PEEDA cument contains neither recommendations nor conclusions of the FBI It is the property of the FBI and Is loaned to your agency; it and its contents are not to be distributed outside your agency.



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b6 b7С Samuel Wright Bodman III

Whenwas asked if he would recommend Mr. Bodman,b6stated he would recommend Mr. Bodman, but felt thereb7Cwas other capable people he would recommend much more readily.b7C

different in their personalities and never got to be close, however, they both decided it would be better he \_\_\_\_\_\_ b6 were to go elsewhere. \_\_\_\_\_\_ was asked if there was ever an event in which someone tried to run him down with a car (see the previous summary memorandum). \_\_\_\_\_\_\_ stated that someone has distorted the facts. \_\_\_\_\_\_\_ stated he was the victim of a hit and run, but neither Mr. Bodman nor Cabot Corporation had anything to do with it. \_\_\_\_\_\_\_ stated he was always treated fairly and he knew of nothing at Cabot that he would consider illegal.

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stated he was unaware of alcohol abuse or illegal drug use or prescription drug abuse by Mr. Bodman, nor has he ever known Mr. Bodman to exhibit any type of bias or prejudice against any class of citizen or any type of religious, racial or ethnic group. stated that he believed Mr. Bodman lives within his financial means and he was unaware of any information concerning Mr. Bodman that could be used to compromise or coerce him.

Howard Blauvelt, Keswick, Virginia, advised that he met Mr. Bodman while they both served as directors for a company, which was a subsidiary of Cabot Corporation known as Cabot Oil and Gas (COG). Mr. Blauvelt advised that he and Mr. Bodman would meet at approximately twelve board meetings for COG over a span of two to three years. Mr. Blauvelt advised that these board meetings took place seven or eight years ago. He advised that he has not had any social contact since the aforementioned board meetings with Mr. Bodman. Mr. Blauvelt described Mr. Bodman as a very intelligent man who is a very capable individual. Mr. Blauvelt stated he has no information whatsoever regarding allegations of improprieties by Mr. Bodman's misuse of Cabot funds. Mr. Blauvelt stated that Mr. Bodman's character is impeccable. He advised his experience with Mr. Bodman as a director leads him to believe that Mr. Bodman is qualified to undertake a position of importance within the United States Government.

Mr. Blauvelt stated he was unaware of alcohol abuse or illegal drug use or prescription drug abuse by Mr. Bodman, nor has he ever known him to exhibit any type of bias or prejudice against any class of citizen or any type of religious, racial or ethnic group. He stated that he believed Mr. Bodman lives within his financial means and was unaware of any information concerning Mr. Bodman that could be used to compromise or coerce him.

Samuel Wright Bodman III

Mr. Blauvelt recommended him for a position of trust and responsibility.

Judge Harold R. Tyler, New York, New York, was interviewed as he had been identified as the person who investigated allegations of improprieties by Mr. Bodman's former spouse. He advised that he has no independent memory relating to an investigation that he is reported to have conducted regarding allegations regarding Mr. Bodman misusing Cabot funds. Judge Tyler stated that he consulted with his employer of the law firm of Patterson, Belknap, Webb, and Tyler LLP, who reviewed past records. Judge Tyler stated the records indicated that Mr. Bodman was listed as a witness giving a deposition in a case but that file is no longer available. He could provide no additional information.

In the previous summary memorandum an individual advised that a sexual harassment suit was filed against Mr. Bodman with the Commonwealth of Massachusetts Commission Against Discrimination (MCAD), Boston, Massachusetts.

A revi<u>ew of the MCAD rec</u>ords indicated that on complainant, filed a complaint August 10, 1994, with the Commonwealth of Massachusetts Commission charging Cabot Corporation with unlawful discrimination on the basis of sex in violation of Massachusetts General laws. 🗖 alleged that she was discriminated against generally in terms and conditions of her employment due to her sex, compensated at a lower rate than males working in the same or similar positions, and constructively discharged from her job as a direct result of the discrimination. Concerning the complaint of general discrimination in terms and conditions of her employment, the Hearing Commissioner found that four incidents cited of alleged discrimination had occurred well before six months of the filing date and were time-barred. A last incident was discussed in his findings concerning the complaint of constructive discharge. complaint of discrimination based on Concerning had unequal compensation, the commissioner found that established that she was a victim of and entitled to judgement. On the third complaint of constructive discharge, he found that the working environment was not intolerable and that had failed to make a case of constructive discharge. Damages of \$227,748, plus interest, in back pay and \$150,000, plus interest, for emotional distress were awarded to

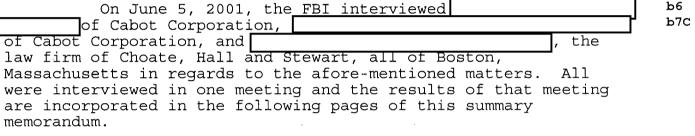
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#### Samuel Wright Bodman III

that she was required to work with an image consultant; that she was required to attend a leadership course (although she ultimately did not); and the restructuring of work assignments. In addition, transcripts revealed that two female Cabot employees . One employee alleged she was testified on behalf of subject to "sexually offensive" conduct by Mr. Bodman and another Cabot manager, specifically that Mr. Bodman, during two separate conversations, placed his hand on her thigh and placed his arm around her. On both occasions others were present. The other did not testify to any actions by Mr. Bodman but offered confirmation of several incidents cited by in her testimony.



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#### FEDERAL BUREAU OF INVESTIGATION

Date of transcription 6/6/01

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	g persons w <u>er</u>	<u>e present</u> at	the interv	view and	
provided significant i			ereafter		
General Counsel of Cab	<u>ot Corporatio</u>				
(hereafter		<u>Litigation</u>			b6
and	(hereafte	r,	of Choate	Hall &	Ъ7С
Stewart (hereafter Cho	ate).				

advised that Choate Hall and Stewart is the law firm which represented Cabot Corporation in the hearings at the Massachusetts Commission Against Discrimination, (hereafter the MCAD), in the case <u>Corporation</u>, (hereafter the <u>Case</u>), <u>advised that</u> <u>Corporation</u>, (hereafter the <u>case</u>), <u>advised that</u> she was the attorney who conducted the defense and whose name appears in the transcripts. The interview took place at Choate, Exchange Place, Boston MA 02109. Cabot is located at Two Seaport Lane, Suite 1300, Boston MA 02210.

The three interviewees, (hereafter the three), were advised of the identity of the interviewing agent and provided with a copy of the consent to release information signed by Samuel Wright Bodman III, (hereafter candidate). The three were advised that the interview was voluntary and that they were free not to answer questions especially if any attorney client privilege issues arose. The three were advised of that the interview was part of the background investigation which was being conducted in furtherance of candidate's possible selection for a White House appointment.

The three were advised that two questions were being posed. The first was "How many complaints or actions have been brought against Cabot which contained allegations of any type of discrimination or harassment and to what extent did they involve candidate?" The second was "As of this year, was candidate aware, that his name had come up in both testimonial and affidavit evidence presented in the \_\_\_\_\_\_ case and what specifically was he aware of (regardless of his view of the merit of the accusations)?"

advised that there were approximately 20 cases to include cases which were settled, and cases that were outside of the Boston area. All the cases that were not settled by Cabot

Investigation on	6/5/01	¥t	Boston,	Massachusetts	۰	
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by <u>SA</u>						b6 b7С

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,<sub>On</sub> 6/5/01

advised that candidate would be far removed or unaware of these matters since they did not require his involvement unless the showed the need for alternate action such as terminating someone or changing or clarifying the policies or practices. No such circumstance was known to \_\_\_\_\_ Out of state matters would be handled locally.

In regards to the second question, \_\_\_\_\_\_advised that candidate would not have read the testimony and was. most likely not aware of all the allegations made by \_\_\_\_\_\_ also advised that, the only reason she put candidate on the stand was that candidate's touching had been complained about in two affidavits. Candidate was aware of the complaints in this regard.

In this regard both advised advised that candidate touches both men and women a lot when he talks to them and confirmed that he had been advised of that fact that individual female's were expressing offense in regards to this behavior. Candidate was advised, that since women might take this in a negative way, touching during conversation was better avoided. \_\_\_\_\_\_ pointed out that in \_\_\_\_\_\_\_ affidavit where she had complained of unwelcome kissing by another individual in management, \_\_\_\_\_\_\_ had not revealed this occurrence to candidate at the time.

also advised that she did not review a lot of the testimony with candidate because she wanted him to take the stand with the same degree of knowledge as before the hearings began. She also advised that it was difficult to remember, regarding any given piece of testimony, whether she had discussed b6 b7С

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it with him, in preparing for her defense and cross examination strategy, since this took place in 1997.

Neither believed that candidate b6 came away from the hearings with a sense that someone perceived b7C him as having created a hostile atmosphere to women, or that he was perceived as having negative opinions regarding the work women could or could not do, or that someone thought his senior management intimated that he had such opinions.

, the circumstances where seen as non discriminatory on the part of Cabot and by candidate to the extent he was knowledgeable of them. The extent to which candidate attributed the dissatisfaction of these individuals to their belief that they were being discriminated against by Cabot or candidate's policies is not known.

about what others said to her about the functioning of women in the work place was either incorrect, or incorrectly attributed to candidate because the phrase senior management didn't always include candidate, or related to her presentation and communication style's ineffectiveness rather than her gender. Therefore, he would not think that candidate would have known she viewed him as participating in what she considered to be an atmosphere hostile to women.

With <u>regards to</u> confirmed that had been · with her presentation style and that this hired to help b6 included some fashion advice. advised b7C that even though candidate was on the Executive Committee (who believed had chosen this fashion consultant), candidate ÷, would not have known her name or that she had been hired and certainly not what she advised [ advised that the same was true for the leadership course (recommended by senior management) whose preliminary questionnaire Eound (It asked questions about belief in religion, the offensive. sexual freedom of women and bodily functions, per testimony). That is candidate would not have been aware of the course choice or its offensiveness to

The three stated that candidate's policy was one of no  $^{\prime\prime}$ 

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Continuation of FD-302 of

on 6/5/01 b7C

harassment or discrimination and that this was conveyed to senior management. They stated that candidate would have wanted to be made aware of discrimination problems that were significant. Therefore, they were asked if candidate could have been remained unaware and uninformed by his senior management as to feelings and complaints at the time (as revealed in testimony and descriptions of the atmosphere created and b6 statements made senior management.) The answer to this is b7C contained in the statement by in the second full advised that the testimony paragraph on page 3 herein. was not reviewed with candidate after the hearing because Cabot viewed her claims as without merit and therefore not warranting any change in practice, policy or management behavior at Cabot.

pointed out that the decision in the case found no discrimination or harassment only that was paid b6 less than her male counterparts and that since she was the only female in this position, the basis for unequal pay was attributed to gender.

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FD-263 (Rev. 4-30-85)

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DẠTE		INVESTIGATIVE PERIOD			
Boston	Bureau	7/9/01 06/05/01 -			06/13/0	1	
TITLE OF CASE		REPOR	T MADE BY			TYPED BY:	
SAMUEL WRIGHT BODMAN, III		SA		N	∆ Т́ъб	aa	
		CHAR	ACTER OF CA	SE	b7С	·	
		LEV	EL II -	PAS			

**BUDED:** PAST (4/17/2001)

NOTE: All inserts and 302's faxed to SIGBIU upon completion 6/6/01 and 6/13/01. Results requested by 6/13/01.

**<u>REFERENCE</u>**: Bureau EC to Boston dated 6/12/01.

(Closed)

**ENCLOSURES:** (1) A 1A envelope containing interview notes of subject.

A 1A envelope containing interview notes of (2)**b**6 b7C

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APPROVED R	SPECIAL AGENT IN CHARGE	DO NOT WRITE IN SPACES BELOW	
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FD-302 (Rev. 10-6-95)

#### FEDERAL BUREAU OF INVESTIGATION

- 1 -

Date of transcription 6/13/01

This interview was conducted at the Boston FBI Office by SA hereafter writer, of Samuel Wright Bodman III, hereafter candidate. Candidate was asked questions regarding several separate topics.

The first topic covered involved the fact that Cabot Corporation had an action filed against them at Massachusetts Commission Against Discrimination (MCAD) and that two of the supporting affidavits involved complaints directly against candidate. Candidate advised that he had not revealed the b6 existence of the hearing v. Cabot Corp.) or the b7C accompanying allegations (which can be found in the below mentioned affidavits) in his SF 86 or during his interview because he had not remembered them at the time of his filing out his form or at the time of the interview. He further advised that he did recall the hearing, but not the allegations in the affidavits, at the time he responded to White House Counsel interrogatories. This inconsistency represents the fact that he saw the matter as inconsequential. He saw the case as one of a person who left the company claiming she was underpaid, stealing files and then taking a job for substantially less money elsewhere.

Candidate also advised that he did not know the specifics of the case, had never read the testimony or affidavits and had no personal recollection of the two instances of inappropriate touching that the two affidavits \_\_\_\_\_\_ and alleged. Candidate stated that he did remember being spoken to about the familiar touching he does with both men and women and that it was being badly received by these women and \_\_\_\_\_\_ He had no intention of inadvertently offending anyone further. However, he considered the matter inconsequential and didn't think about it during the time he filled out his form, the White House interrogatories or responded in his interview. He advised that as of the ongoing instant interview (6/13), he did not remember being asked about the touching during his testimony.

He noted that when he filled out the White interrogatories he did not mention his testimony as a witness in his divorce trial, though he remembered to put it down on the

Investigation on	6/13/01	at Boston, Mas	sachusetts		
File # <u>161B-HQ</u>	2-1337020		Date dictated	6/13/01	
by <u>SA</u>		P			ь6 ————————————————————————————————————

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Continuation of FD-302 of	Samuel	Wright	Bodman	III	

FBI's SF 81. He advised that the divorce records had been sealed.

Candidate stated that when he came to Cabot he found almost no ethnic, gender or religious diversity and that out of 24 Officers only one remained after three years. Candidate feels he changed the culture in that regard, promoting diversity and equal treatment, as well as making it clear to senior management that any problems in this area where to be reported to him.

Candidate formed an executive committee so he could make major changes with the input of those who knew the particulars of the business. Candidate also wanted to make change in a way which did not discredit people. Having decisions come from the executive committee rather than from him personally allowed everyone to take credit and to be respected through massive change. Candidate stated that this committee would have not been involved in such matters as picking a presentation consultant for a given attorney, but that captains had the latitude to run their own departments. Candidate does not, believe that would ever involve themselves in the kinds of actions that the complainant describes. If that had happened candidate would have expected to have been informed and would have taken action. Candidate advised that it is possible that a presentation consultant was hired but that candidate would have not felt it was appropriate for this to include input on dress.

Candidate advised that his concerns with presentation and appearance are not gender related but related to how effective the companies personnel are in negotiations. Candidate confirmed the situation with an female plant manager who was sent to a small town in the hills of Italy and was unable to function because of the attitudes towards women. Candidate stated that Cabot should have provided a greater support system and that this would be a valid criticism. Candidate advised that there was discussion of the effectiveness of women in certain countries and that Cabot struggled with how to proceed. Cabot ultimately decided that Cabot should live by its own values overseas just as in the US and that these values were more important than profits. Cabot does not avoid placing women in overseas positions but tries to encourage the host countries come to the realization that individuals are being chosen for their competence. b6 b7С

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Candidate did remember some aspects of the matter involving and advised she was working part-time b6 because of the ages of her children and that she recognized that b7c she either needed to work full time or give up certain kinds of assignments. Candidate advised that the independence of Human Resources and their procedures of of due process where respected by him. The only time he would have considered stepping in is if they where not aggressive enough in providing recourse for those who where being discriminated against or otherwise harassed.

Candidate advised that American Oil and Gas (AOG) purchased CARCON (a company in which candidate invested). All CARCON's management went over to AOG. Candidates stock in CARCON was then converted into AOG by the merger.

Then, as CEO of Cabot, candidate made the decision to sell West Star, a Gas Transmission Company owned by Cabot, to AOG. West Star had been bought by Cabot for over 200 million and was valued at 30 million by the time candidate became CEO. Candidate had stock in AOG by virtue of AOG's purchase of CARCON. However, it was determined by Cabot that candidate owned so little stock in AOG as compared to Cabot that no concerns (conflict of interest) were raised. (Cabot was paid in AOG stock and this prevented Cabot from losing money on West Star.)

Candidate advised that he had never heard of Candidate advised he has never moved assets off shore Candidate advised he has never moved assets off shore conceal their existence for tax reasons. Candidate could not comment on if, between 1986 and 1987, CARCON could have changed from saying Harkon had been and investor/shareholder in CARCON to saying it was not an investor/shareholder. (writers note: Harkon was a company of \_\_\_\_\_\_ whose assets had a seizure order entered against them in the BCCI case). (The removal of Harkon as a shareholder put \_\_\_\_\_\_ assets in CARCON out of reach of the seizure order.)

Candidate advised that for about nine months in 1993 1994 (or 1994-1995) he was see by a Psychiatrist

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Continuation of FD-302 of	Samuel Wright	Bodman III	, On 6/13/01 , Pag	<sub>je</sub> 4

M.D.) at Massachusetts General Hospital to talk about some issues relating to his marriage. \_\_\_\_\_\_ prescribed Prozac (10 mg ) for him for that time. This coincided with the period of time one month before, and 8 months after, he moved out of his home with his second wife.

Candidate advised that he drinks 1-2 scotch drinks and 1-2 glasses of wine each night. He advised he was never told to attend AA meetings but to become familiar with the program since his son should be attending. <u>Candidate</u> went to one meeting because he misunderstood what meant by suggesting b6 <u>b7c</u> never intended to candidate to go.

Candidate advised that he never physically or verbally abused his wife. Candidate advised that his ex-wife

Candidate also advised that his ex-wife would scream at Cabot's Directors in public (the Boston Commons). Her public allegations, at parties etc, were that he had stolen from Cabot and bribed the Algerians. Candidate is not overly familiar with all her allegations but advised that Judge Tyler advised him they had no merit. Candidate advised that he did not discuss this in the interview because he did not think questions about his conduct, conflict of issues, and the behavior of those around him pertained to untrue allegations made by his ex-wife and because the personal details of his divorce where not requested. Candidate suggested that the questions should have been asked differently. Candidate advised that he did not discuss the abuse b6 b7С

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Continuation of FD-302 of	Samuel Wright Bodman III	, On 6/13/01 , Page 5
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allegations, when asked about abuse, because they were allegations and not the truth. He advised that he did not consider the question regarding whether there had been any complaints by anyone, either informal or formal, against him to include his ex-wife's allegations. Candidate likewise advised that the other questions asked (i.e. theft, breaches of trust) would have not have been considered by him to pertain to allegations of his ex-wife unless he had been asked if his exwife had made any such allegations. FD-204 (Rev. 12-1-95)

#### UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Office: Boston

Copy to:

Report of: SA Date: July 9, 2001

Case ID #: 161B-HQ-1337020

Title: SAMUEL WRIGHT BODMAN III

Character: LEVEL II - PAS

Synopsis:

Second interview of candidate completed. Candidate was not able to fully explain why his ex-wife did not classify as "anyone" when he was asked if any complaints where ever made against him by anyone. Candidate advised he drinks both wine and hard liquor each night. Candidate advised that he viewed his Psychiatrist visits as marital counseling even though his wife did not attend and therefore did not report them separately. Psychiatrist who treated candidate interviewed. General Counsel of Cabot Corporation interviewed. Litigation Counsel of Cabot Corporation and the Lawyer (of an outside firm) which represented Cabot Corporation in response to the suit brought by interviewed. b6

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

b6 b7С

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The following investigation was conducted by Special	b6 b7С
On 6/13/01 ., a psychiatrist at The Massachusetts General Hospital Wang Ambulatory Care Center. #815 Department of Psychiatry, Boston Ma 02114 and also at Harvard Medical School was contacted regarding Samuel Wright Bodman, III. was advised of the identity of the interviewing agent and the purpose of the interview that is to further the background investigation of Bodman's candidacy for a presidential appointment. was provided with the Authorization for release of Medical Information, signed by Bodman.	] ь6 ь7с
advised that Bodman was under his care or about nine months over five years ago, but that his file was inactive. advised the there was no diagnosis and that Bodman was being see in relation to a life circumstance which was producing some stress. Advised that Bodman suffered from no mental disorders and that his is psychologically healthy and stable. There is no prognosis because he suffered from no illness.	b6 b7С
was advised that Bodman reported prozac use and advised that he hadn't remembered at first but that this was true but that he stopped prescribing it since it didn't do much for Bodman advised that the personal issues were concluded and that he recommended Bodman for a position of trust with the U.S. government including the context of national security information and nuclear information or material advised that there was no need for further treatment and that he highly recommended Bodman personally and professionally.	Ь6 Ь7С

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**U.S. Department of Justice** 

Federal Bureau of Investigation

Washington, D. C. 20535-0001

# JUN 1 4 2001

BY COURIER

Honorable Alberto R. Gonzales Counsel to the President The White House Washington, D.C.

Dear Mr. Gonzales:

Reference is made to my letters to your office dated May 22, 2001 and June 13, 2001, which furnished the partial results of a Level II background investigation concerning Mr. Samuel Wright Bodman III. Enclosed is a summary memorandum containing the results of additional inquiries concerning this matter.

Also enclosed is a copy of your March 14, 2001 request, which has been initialed and date by a representative of the FBI's Office of General Counsel.

The names and identifying data have been excised from the enclosed summary in order to protect their identities in the event there is a need to interview them in the future and they request confidentiality. No change is made to the substance of the summary.

questions Specialis telephone	s, they m <u>ay be direc</u> st (SPSS)	5	Should you have any ry Personnel Securit at 10 = 1337020-	
Dep. Dir	00 to 310 90 10 000000	Sincerely yours	ь6 b7c	
Chief of Staff_ Off. of Gen. Counsel Asst. Dir.: Admin. Ser CIIS Finance Info. ResBGKAbgl	es (2) pu un sido	Special Inquiry	estigations Unit Dissem. to: <u>DIE/</u> Dissem. on: 1217 //	08/
Insp Lab CLOCTO OPR Off. of Public & Cong. Affs Training Off. of EEOA	Return to Ms.	I SSS Jaims Reach Nr 10/9/2001	Reg. Rec'd: 12/13/ Soom by UH Room 4371 Program	b6 b7C
Director's Office	MAIL ROOM □ 10/22/2001 4/4ads/N	Nr 10/9/2001		



Honorable Alberto R. Gonzales

NOTE: Mr. Bodman was reinterviewed and Mr. Bodman advised that he drink one to two scotch drinks and one to two glasses of wine each night. He advised he only attended an Alcoholic Anonymous meeting for his son. Mr. Bodman advised in 1993-1993 he saw a psychiatrist relating to his marriage and he was prescribed Prozac. The psychiatrist was interviewed. Mr. Bodman advised he never physically or verbally abused his former spouse. Mr. Bodman was reinterviewed and advised he did not discuss his former spouse's allegation because the question was asked differently and he felt that the allegation was untrue due to an investigation by Cabot.

Investigation is complete.

Non-FBI (5) late leads.

**U.S. Department of Justice** 

Federal Bureau of Investigation

Washington, D. C. 20535-0001

# JUN 1 4 2001'

#### SAMUEL WRIGHT BODMAN III

The information in this summary memorandum supplements the information contained in the summary memorandum dated May 22, 2001 and June 13, 2001, and completes this background investigation.

### Miscellaneous

Dep. Dir

Asst. Dir.

CJIS Finance

OPR Off. of Public & Cong. Affs.

Info. Res. Insp.

Off. of Gen. Counsel

In the previous summary memorandum dated May 22, 2001, information was reported that an individual stated that a sexual harassment suit was filed against Mr. Bodman with the Massachusetts Commission Against Discrimination, Boston, (Refer also to the summary memorandum date Massachusetts. June 13, 2001, for additional details in this matter). During Mr. Bodman's divorce from she publicly alleged that Mr. Bodman misused Cabot funds and made business arrangements through Cabot Corporation for his own advantage. (Mr. Bodman is employed by Cabot Corporation, Boston, Massachusetts, as the President and Chief Executive Officer.) Also, an individual alleged that Mr. Bodman invested with another individual who formed the Bank of Credit and Commerce International (BCCI). (BCCI was the subject of one of the largest bank fraud investigations ever prosecuted).

Also, in the summary memorandum dated May 22, 2001, a review of the Suffolk County Probate and Family Court, Boston, Massachusetts, indicated that Mr. Bodman's former spouse alleged that Mr. Bodman was verbally abusive toward her and that he was involved in a romantic affair with another woman. The records also contained information that Mr. Bodman's former spouse alleged one incident of physical abuse.

Additionally, an individual stated that Mr. Bodman took Prozac, an antidepressant, and attended Alcoholic Anonymous (AA) meetings on the direction of a psychiatrist that was treating his Chief of Staff son. This individual also alleged that Mr. Bodman was a daily drinker of hard liquor and wine. Admin.Ser.

Crim. Inv. On June 13, 2001, the FBI reinterviewed Mr. Bodman in regards to the afore-mentioned matters. The results of that - interview are incorporated on pages 3-7 of this summary National Sec\_ memorandum.

h6b7C Samuel Wright Bodman III

On June 16, 2001, Psychiatrist, Massachusetts General Hospital, Boston, Massachusetts, advised that Mr. Bodman was under his care for nine months about five years ago and since that time his file has been inactive. advised that there was no diagnosis and that Mr. Bodman was being seen in related to a life circumstance which was producing some stress. \_\_\_\_\_\_ advised that Mr. Bodman suffered from no mental disorder and that he is psychologically health and stable. initially indicated that Mr. Bodman had not received any medication but when he was advised Mr. Bodman reported a prescription for Prozac, remembered he prescribed it to Mr. Bodman but subsequently stopped the prescription since the antidepressants did not do much for him. stated that Mr. Bodman has no prognosis because he suffered from no illness. He advised there was no need for further treatment and he recommended Mr. Bodman for a position of trust with the United States government.

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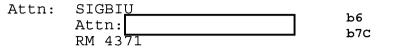
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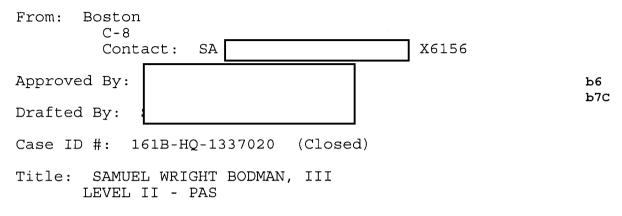
2

# Precedence: DEADLINE 04/12/2001

Date: 07/09/2001

To: Administrative Services





Synopsis: Phone call to writer by ex-wife of candidate requesting non-anonymous status.

Details: On or about June 28, 2001 \_\_\_\_\_, the ex-wife of subject called writer and advised that she had contacted Senator Kerry's office and learned that none of the materials that she had provided to writer had been received by that office. \_\_\_\_\_\_ wanted an explanation of this and names of people she could contact at FBIHQ to further her inquiry. \_\_\_\_\_\_\_ also stated that she wished to change her status from anonymous to true name. \_\_\_\_\_\_ was advised that the nature of her call would be relayed to FBIHQ and that she would be re-contacted if FBIHQ so directed. \_\_\_\_\_\_ was advised that writer had no information of the handling of the information once it left Boston.

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07/10/2001 Precedence: DEADLINE 04/12/2001 Date: b6 To: Administrative Services Attn: SIGBIU b7C Attn: RM 4371 From: Boston C-8 X6156 Contact: SA b6 Approved By: b7C Drafted By:

Case ID #: 161B-HQ-1337020 (Closed)

Title: SAMUEL WRIGHT BODMAN, III LEVEL II - PAS

Synopsis: Phone call to writer by ex-wife of candidate advising of her intent to provide documents directly to the US Senate which were previously provided to the FBI.

Details: On or about July 2, 2001 , the ex-wife of subject called writer and advised that she was going to forward the documents that she had provided to the FBI in the above captioned matter directly to Senator Kerry's office. She was taking this action because his office had never received the materials.

b6 b7С (Rev. 08-28-2000)

# FEDERAL BUREAU OF INVESTIGATION

Precedence: DEADLINE	04/12/2001	Date:	07/10/2001	
To: Administrative S	ervices Attn:	SIGBIU Attn: RM 4371	bi bi	
Grom: Boston C-8 Contact: S	A	X6156		
Approved By:		Ь6 Ь7С	X	
Drafted By:				
<b>Case ID #:</b> 161B-HQ-1	337020 (Closed)			
<b>Title:</b> SAMUEL WRIGHT LEVEL II - PA	BODMAN, III S			

Synopsis: Phone call to writer by ex-wife of candidate advising of her intent to provide documents directly to the US Senate which were previously provided to the FBI.

Details: On or about July 2, 2001 the ex-wife of b6 subject called writer and advised that she was going to forward the documents that she had provided to the FBI in the above captioned matter directly to Senator Kerry's office. She was taking this action because his office had never received the materials.

(EC) war 7-12 Matter

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# FEDERAL BUREAU OF INVESTIGATION

Precedence: DEADLINE 04/12/2001	<b>Date:</b> 07/09/2001
To: Administrative Services V Attn: From: Boston C-8 Contact: SA	SIGBIU Attn: RM 4371 b6 b7c
Approved By: Drafted By:	ь6 ь7С
Case ID #: 161B-HQ-1337020 (Closed)	
Title: SAMUEL WRIGHT BODMAN, III LEVEL II - PAS	

**Synopsis:** Phone call to writer by ex-wife of candidate requesting non-anonymous status.

Details: On or about June 28, 2001 the ex-wife of subject called writer and advised that she had contacted Senator Kerry's office and learned that none of the materials that she had provided to writer had been received by that office. wanted an explanation of this and names of people she could contact at FBIHQ to further her inquiry. also stated that she wished to change her status from anonymous to true name. Was advised that the nature of her call would be relayed to FBIHO and that she would be re-contacted if FBIHQ so directed. Was advised that writer had no information of the handling of the information once it left Boston.

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93349 H-17 Jobu (EC) 7-12

(Rev. 08-28-2000)

# FEDERAL BUREAU OF INVESTIGATION

<b>Precedence:</b> DEADLINE 12/05/2003 <b>Date:</b> 11/10/2003
To: Boston Detroits Chicagon Wiami New Haven Kichmond Washington Field To: Boston BS& WF 1+2 faced Julio Ja3 BK Attn: Squad A-1 Squad A-1
Squad A-2
From: Administrative Services
Special Inquiry and General Background Investigations Unit (SIGBIU), Room 8360
Contact: PSS Ext 4755
Approved By:
b6 b7C
Drafted By:
<b>Case ID #:</b> 161L-HQ-1337020 (Pending)
Title: SAMUEL WRIGHT BODMAN, III LEVEL II-PAS

**Synopsis:** Initiation of a full-field background investigation (FFI) on captioned candidate.

Administrative: BUDED is 12/05/2003.

RECEIVING OFFICES ARE TO ENSURE THAT A COPY OF THIS EC IS PROVIDED TO EACH INDIVIDUAL CONDUCING INVESTIGATION IN CAPTIONED MATTER. ADDITIONALLY, WHEN SENDING FOLLOW-UP LEADS TO OTHER FIELD OFFICES NOT KNOWN TO BE INVOLVED IN CAPTIONED MATTER, ENSURE THAT A COPY OF THIS EC IS PROVIDED TO THOSE FIELD OFFICES AND THAT THIS EC SERIAL IS REFERENCED.

Field offices should also refer to the investigative guidelines set forth in MIOG, Part I, Section 161, and Part II, Section 17, for additional assistance in conducting investigation in captioned matter.

# CANDIDATE INTERVIEWS

Regardless of the scope, i.e., the time frame, to be addressed in candidate's FFI, the initial candidate interview is to

1612-HQ-1337020-39 MAIL DIRECT from SPECIAL INQUIRY UNIT, ASD BY

address each of those areas set forth in MIOG, Part II, Section 17-5.6(2)(a)-(o), for the candidate's entire adult life, i.e., since his/her 18th birthday, except for counseling. When addressing each of the areas with the candidate, he/she is to be advised that responses to all questions asked are to address candidate's entire adult life (i.e., since his/her 18th birthday), except for counseling which must be addressed as set forth below in "Counseling/Counselor Interviews". The fact that questions addressing each of the areas were asked, as well as candidate's responses thereto and knowledge of their scope, must be clearly set forth in the FD-302 reflecting the results of the candidate's interview.

If the candidate refuses to answer any question, that is to be clearly set forth in the FD-302 reflecting the results of the candidate's interview. An effort should be made to obtain from the candidate an explanation for refusing to answer and, if provided, the explanation is also to be reported in the FD-302. If the candidate refuses to provide an explanation, that also is to be reported. Thereafter, no further efforts to obtain a response to the question candidate refused to answer should be made, unless instructed by SIGBIU, FBIHQ.

#### COUNSELING/COUNSELOR INTERVIEWS

Counseling information to be solicited from the candidate is to be limited only to that information set forth in questions 21 and 25 of candidate's SF-86, except that the information is to cover only the scope of candidate's FFI (but not prior to his/her 18th birthday). Therefore, the scope for the counseling question in this investigation is **15 years**. Counseling which occurred outside the scope of the candidate's FFI is not to be solicited or addressed, unless otherwise instructed by SIGBIU, FBIHQ. NOTE: Policy also prohibits marriage, family, or grief counseling from being solicited and addressed, except where violence by the candidate is involved.

For interviews of counselors, a copy of an executed "Authorization for Release of Medical Information" form must be used. The questions which can be asked of counselors are limited. In addition to verifying the dates of the counseling, the questions asked are to be limited only to the three questions set forth on the aforementioned release. The counselor is to be instructed to provide only that information he/she believes is responsive to each of the three questions. Each question is to be specifically asked and answered, and responses to each clearly reported in the FD-302/insert reflecting the interview results.

Because information concerning counseling is limited to the scope of the FFI, if the candidate voluntarily provides counseling information which occurred outside the scope of the BI, that information is to be fully explored with the candidate only during his/her interview, recorded and reported. However, no additional investigation is to be conducted concerning the information, unless instructed to do so by SIGBIU, FBIHQ. The fact that the information beyond the scope of the FFI was volunteered by the candidate, and not solicited by the FBI, must also be clearly set forth in the FD-302 reflecting the results of the candidate's interview.

Ensure to conduct investigation as set forth under the "Leads" section herein and/or as marked on the enclosed SF-86.

Field offices are reminded that neither the investigative status of a background investigation nor any deadlines are to be disclosed to the candidate or any interviewees. Candidates making inquiries of the status of their investigation are to be referred to the client entity

Direct results/questions to PSS Advise SIGBIU (PSS and appropriate field offices of any derogatory information in accordance with MIOG, Part II, Section 17-5.1(1). If Buded will not be met, telephonically advise PSS and set forth reason(s) in <u>Administrative Section</u> of investigative report. SIGBIU facsimile numbers are (202) 324-6618 and (202) 324-1865.

**Enclosure(s):** Being forwarded to each field office, (either scanned or) with a hard copy of this EC via Bureau mail, is one copy each of the following: candidate's SF-86, dated 11/04/2003, Authorization for Release of Information, dated 11/04/2003, and Authorization for Release of Medical Information, dated 11/04/2003.

**Details:** Bureau has been requested by the WH to conduct a Level II FFI of candidate. Candidate's last FBI background investigation was closed in 6/01. Update from 6/91 unless otherwise noted. Candidate's computerized credit report has not been made available for review, additional leads maybe forth coming.

3

LEAD(s):

Set Lead 1: (Action)

BOSTON

AT BOSTON, MA

Review EC and enclosures, and conduct appropriate investigation.

Verify residence and conduct appropriate interviews.

 $3^{\prime\prime}$  Interview any <u>2</u> listed reference and independently developed <u>2</u> references and interview.

 $\mathcal{N}$  Interview a sampling of at least one or two persons on the boards affiliated with the candidate. See Question 1S of Supplement to SF-86 regarding the candidate.

Conduct USA, DMV, and arrest checks on candidate.

Conduct indices on candidate, candidate's spouse and listed relatives.

### Set Lead 2: (Action)

DETROIT

AT DETROIT, MI

Review EC and enclosures, and conduct appropriate investigation.

Conduct indices on candidate and listed relative.

Set Lead 3: (Action)

<u>CHICAGO</u>

### AT CHICAGO, IL

Review EC and enclosures, and conduct appropriate investigation.

Conduct indices on candidate and listed relative.

# Set Lead 4: (Action)

HOUSTON

AT HOUSTON, TX

Review EC and enclosures, and conduct appropriate investigation.

Conduct USA and arrest check on candidate.

### Set Lead 5: (Action)

MIAMI

# AT MIAMI, FL

Review EC and enclosures, and conduct appropriate investigation.

Conduct USA and arrest check on candidate.

### Set Lead 6: (Action)

NEW HAVEN

#### AT NEW HAVEN, CT

Review EC and enclosures, and conduct appropriate investigation.

Conduct indices on candidate and listed relative.

# Set Lead 7: (Action)

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#### RICHMOND

### AT RICHMOND, VA

Review EC and enclosures, and conduct appropriate investigation.

Conduct indices on candidate and listed relative.

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To: Boston From Administrative Services Re: 161L-HQ-1337020, 11/10/2003

Set Lead 5: (Action)

## WASHINGTON FIELD

AT WASHINGTON, DC

#### LEADS FOR SQUAD A-1

Review EC and enclosures, and conduct appropriate investigation.

Conduct "initial" candidate interview as noted in the Administrative Section, above. During interview, discuss candidate's foreign activities. Also, have the candidate provide his activities for 3/2001 to 7/2001. During candidate interview, please see attached SF-86 and Supplement to SF-86, for issues to be discuss during candidate interview.

Verify residence and conduct appropriate interviews.

Verify employment and conduct appropriate interviews.

Set Lead 8: (Action)

#### WASHINGTON FIELD

AT WASHINGTON, DC

#### LEADS FOR SQUAD A-2

Review EC and enclosures, and conduct appropriate investigation.

Conduct USA, DMV, and arrest checks on candidate.

Check IG\SY\OPR\OPF at Commerce.

Check White House and USSS.

Check Public Integrity Section at Department of Justice.

Conduct indices on candidate, candidate's spouse and listed relatives.

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		DCII CHECK REQUEST FORM	
* * *	********	**************************************	
	PL	EASE RETURN TO PSS ROOM 4371.	b6 b7С
	SUBJECT:	BODMAN, SAMUEL, WRIGHT See Attached	
	DOB:	1938/11/26	
	SSAN:	329-32-7756	
	OTHER-NAM	ES:	

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FUNCTION: *********	*****	SUBJECT: BODMAN		* * * * * * * * * * * *	SSN: 329-32	
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NO OPM FILES

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REQUEST DATE: 11/11/2003 RUN DATE : 11/11/2003

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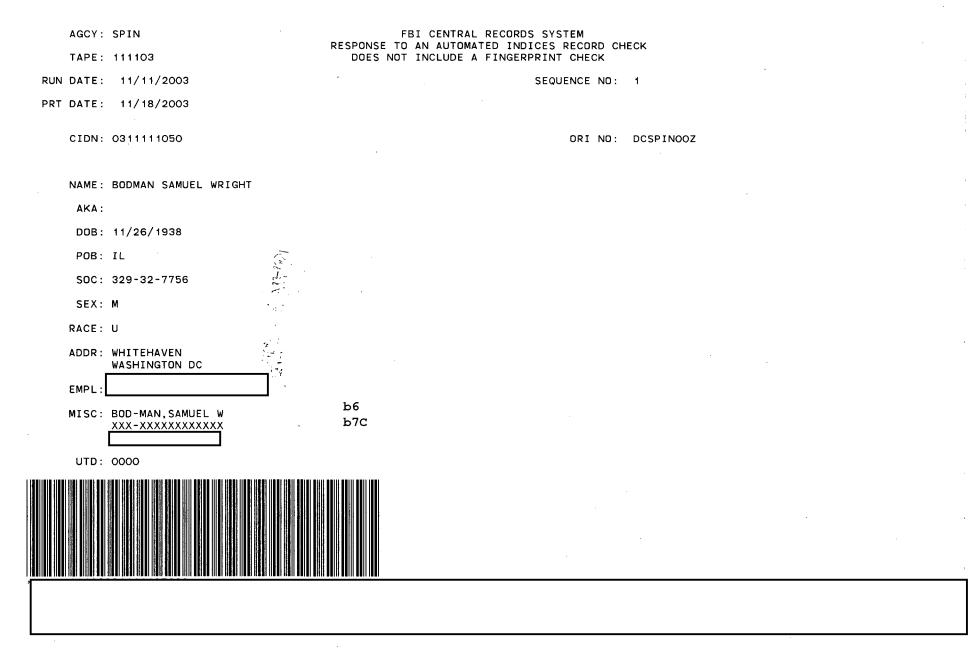
AGENCY: SPIN - TAPE: 111103 SUMMARTY LIST SPIN PAGE 7 BII400PG

# FBI CENTRAL RECORDS SYSTEM RESPONSE TO AN INDICES RECORD CHECK (DOES NOT INCLUDE A FINGERPRINT CHECK)

ANALYST/NUMBER	MAIN SUBJECT	NAME	CIDN & EXT.	RESULT
113705	BODMAN, SAMUEL WRIGHT	BODMAN, SAMUEL WRIGHT	0311111050 00	<u>т</u> ь6 b7C

DECLASSIFIED BY: NSICG ON 09-20-2019 b6 b7C \*\*\*\*\*\*\*\*\*\* \*\*\*\*\* \*\* 11/18/03-NAME CHECK Run 1 - Page-1 \* \* \*\* 02:08:22 /01 User # \*\* Subject: ( \* \* \*\* Search: BODMAN, SAMUEL WRIGHT \*\* Agency: WHITE HOUSE/SPECIAL INQUIRY CIDN : 0311111050 \* \* b6 \* \* \* \* \*\* Return to.: b7C Room Superviso Ext \* \* \* \* \* \* \*\* File Review R# PROD UTD \* \* : \* \* DEC 0 2 2003\*\* Search SOC: 329-32-7756 \*\* Search DOB: 11-26-1938 \*\* Rules....: ATP,R,A,N,Y,N,A,N,N \* \* \*\*\*\*\*\* \*b6 \*\*\*\* BODMAN, WIEL, W 2360 11-13-03 Subj. Bidine ... b7C Tue Name: BODMAN, SAMUEL, WRIGHT we Entry Date: 03/21/2001 (I) 161L-HQ-1337020 \* MORE THAN 1 SECTION/SERIAL FOUND FOR CASE \*\*FACS\*\* b6 \* SECTION 1 OF FILE CHARGED OUT TO ON 20031114 \*\*FACS\*\* b7C \* PHONE: 202-324-4755 ROOM: 8360 BLDG: JEH \*\*FACS\*\* BODMAN, SAMUEL, WRIGHT Entry Date: 03/21/2001 (I) 161L-HQ-1337020 \* MORE THAN 1 SECTION/SERIAL FOUND FOR CASE. \*\*FACS\*\* \* SECTION 1 OF FILE CHARGED OUT TO ON 20031114 \*\*FACS\*\* b6 \* PHONE: 202-324-4755 ROOM: 8360 BLDG: JEH \*\*FACS\*\* b7C \*\*\*\*\* SEGRET \* \* \* \* \*\*\*\*\* \*

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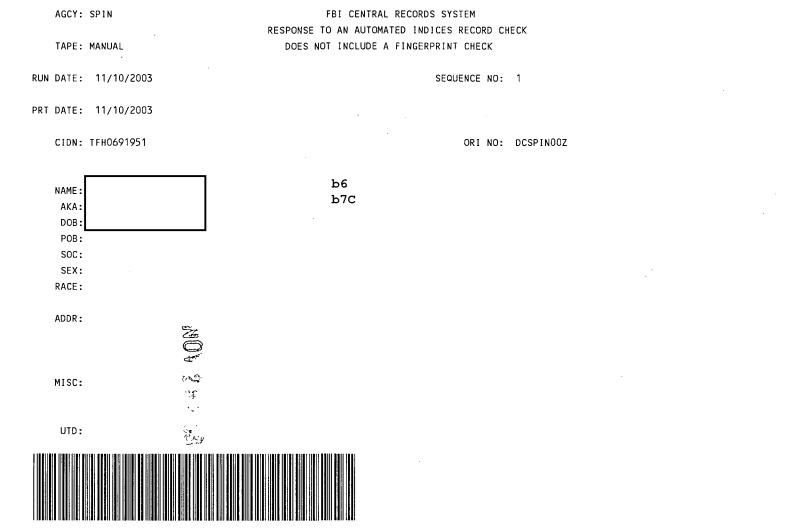
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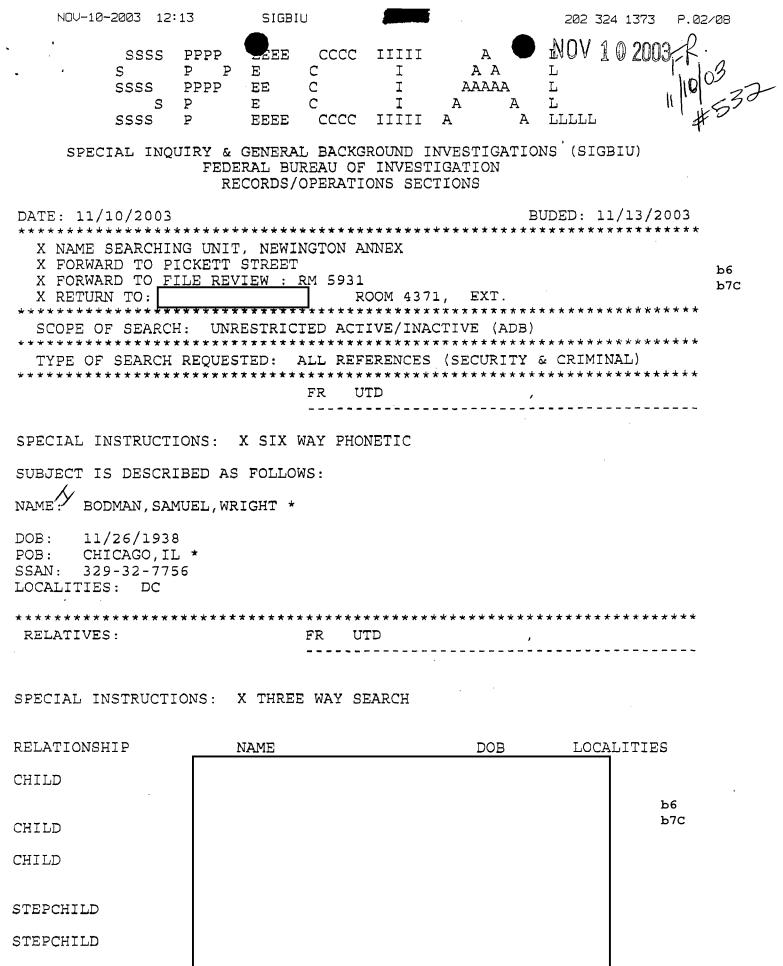
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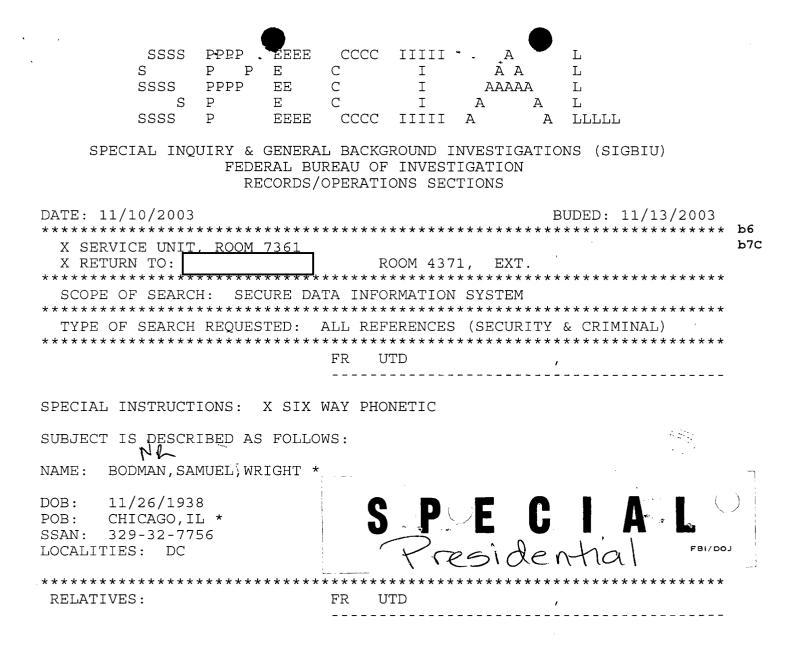
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BROTHER

CURRENT SPOUSE

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SPECIAL INSTRUCTIONS: X THREE WAY SEARCH

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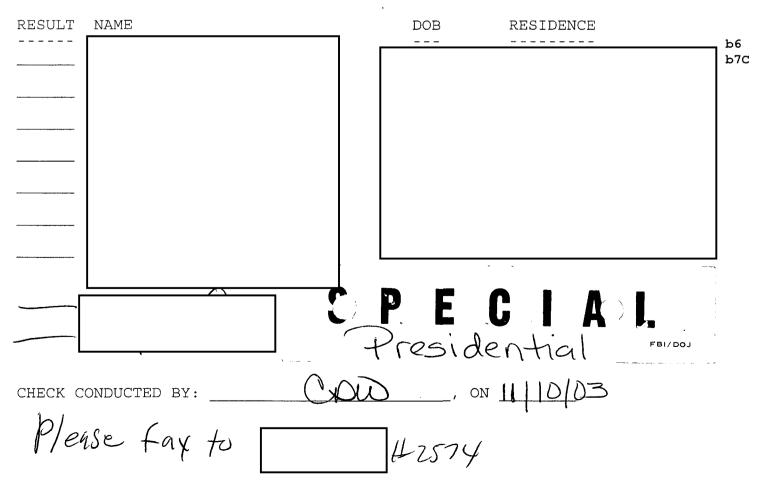
IDÊNT	CHECK	ROOM 1126	52B TUBE	J1, ATTN:	b6 b7C		
FROM:	SPECIAL EXT:	INQUIRY & ATTN:		BACKGROUND	INVESTIGATIONS		RМ b6 b7C
SUBJEC	CT: SAMU	JEL WRIGHT	BODMAN		BUDED:	: 11/13/2003	

BUREAU FILE NUMBER: 161B-\*

THE BUREAU HAS BEEN REQUESTED TO CONDUCT AN EXPEDITE BACKGROUND INVESTIGATION OF THE ABOVE\_CAPTIONED SUBJECT, )WHO IS BEING CONSIDERED FOR PRESIDENTIAL APPOINTMENT. YOU ARE REQUESTED TO CHECK APPROPRIATE INDICES BASED UPON AVAILABLE INFORMATION CONCERNING SUBJECT, EMPLOYMENT, AND ALL CLOSE RELATIVES. IT IS REQUESTED THAT THE RESULTS OF YOUR CHECK, WHETHER POSITIVE OR NEGATIVE, BE INDICATED IN THE SPACES/PROVIDED BELOW, AND RELAYED TO THE SPECIAL INQUIRY & GENERAL BACKGROUND INVESTIGATIONS UNIT, RM 4371 VIA ROUTING SLIP MARKED 'URGENT'.

SUBJECT IS DESCRIBED AS FOLLOWS: RESULT NAME: SAMUEL WRIGHT BODMAN DOB: 11/26/1938 POB: CHICAGO, IL SSAN: 329-32-7756 CURRENT ADDRESS: 3025 WHITEHAVEN ST WASHINGTON, DC 20008 EMPLOYMENT: U.S. DEPARTMENT OF COMMERCE 14TH STREET&CONSTITUTION AVE WASHINGTON,

CLOSE RELATIVES



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 ICN ISIS0003000015625657
 CIDN
 OCA

 BODMAN,SAMUEL WRIGHT
 W 600 1938/11/26
 MNU
 SOC 329 32 7756
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 FPC
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USCIC000Z OFF/COUNSEL/PRSDNT WASHINGTON DC 2003/06/03 A SEARCH OF THE FINGERPRINTS ON THE ABOVE INDIVIDUAL HAS FAILED TO DISCLOSE PRIOR ARREST DATA. CJIS DIVISION 2003/11/14 FEDERAL BUREAU OF INVESTIGATION

> USCIC000Z OFF COUNSEL TO PRESIDENT THE WHITE HOUSE OLD EXEC BLDG-RM 136 1600 PENNSYLVANIA AVE NW WASHINGTON, DC 20500-0001

NCIC CHECK ROOM 1328 TL153, ATTN: WANTED & CCH FILES	b6 b7С
FROM: EXT: ATTN: PSS	b6 b7С
SUBJECT: SAMUEL WRIGHT BODMAN $MR$ BUDED: 12/05 AKA(S):	5/2003
THE BUREAU HAS BEEN REQUESTED TO CONDUCT AN EXPEDITE BACKGROUND INVESTIGATION OF THE ABOVE-CAPTIONED SUBJECT, WHO IS BEING CONSIDERED FOR PRESIDENTIAL APPOINTMENT. YOU ARE REQUESTE TO CHECK APPROPRIATE INDICES BASED UPON AVAILABLE INFORMATION CONCERNING SUBJECT, EMPLOYMENT, AND ALL CLOSE RELATIVES. IT IS REQUESTED THAT THE RESULTS OF YOUR CHECK, WHETHER POSITIVE OR NEGATIVE, BE INDICATED IN THE SPACES PROVIDED BELOW, AND RELAYED TO THE VIA ROUTING SLIP MARKED 'URGENT'.	
SUBJECT IS DESCRIBED AS FOLLOWS RESULT NAME: SAMUEL WRIGHT BODMAN DOB: 11/26/1938 POB: CHICAGO, IL SSAN: 329-32-7756 CURRENT ADDRESS: 3025 WHITEHAVEN ST WASHINGTON, DC 20008 EMPLOYMENT: U.S. DEPARTMENT OF COMMERCE 14TH STREET&CONSTITUTION AVE WASHINGTON,	
CLOSE RELATIVES	
RESULT NAME DOB RESIDENCE	

b6 b7С

APRIL A PRICE

NCIC CHECK (CONT.)

YOU, ON 11/10/03 CHECK CONDUCTED BY: \_\_\_\_

# FEDERAL BUREAU OF INVESTIGATION

Precedence: DEADLINE 12/05/2003	Date: 11/12/2003
To: Boston - fund 11/12/03 ph Detroit Chicago Houston Miami New Haven Richmond	
Washington Field-franked 11/12/03 Bl	Attn: Squad A-1 Squad A-2
From: Administrative Services Special Inquiry and General Bac Unit (SIGBIU), Room 8360 Contact: PSS	ckground Investigations Extension 4755
Approved By:	У b6 b7C
Drafted By:	
<b>Case ID #:</b> 161L-HQ-1337020 (Pending)	
Title: SAMUEL WRIGHT BODMAN, III LEVEL II-PAS	
<b>Synopsis:</b> Change in captioned classificat of leads.	ion changed and discontinue
Administrative: BUDED is 12/05/2003.	
Reference: 161B-HQ-1337020 serial 35	
<b>Details:</b> Receiving offices are to note cl should be <b>*161L-HQ-1337020</b> , please make n results/questions to PSS	
11-13-02 1612-HQ-133	7020-38

317bgk02.wpd

# LEAD(s):

Set Lead 1: (Action)

# BOSTON

### BOSTON, MA

White House has requested captioned candidate be a limited update. An update from 6/2001 is needed. Therefore, lead to interview listed references and independently developed reference and interview a sampling of persons on boards can be discontinued. All other leads must be conducted and forward to FBIHQ by buded. **\*Note** classification has changed.

Set Lead 2: (Action)

## WASHINGTON FIELD

#### WASHINGTON, DC

#### SQUAD A-1

White House has requested that captioned candidate be a limited update. An update from 6/2001 is needed. Therefore, WF is to ensure that 8 to 10 professional associates are interviewed. All other leads must be conducted and forward to FBIHQ by buded. \*Note classification has changed.

Set Lead 3: (Action)

### WASHINGTON FIELD

#### WASHINGTON, DC

#### SQUAD A-2

White House has requested that captioned candidate be a limited update. An update from 6/2001 is needed. \*Note classification has changed. Set Lead 4: (Action)

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# All RECEIVING FIELD OFFICES

# \*Note classification has changed.

CC: 1 - PSS	6 7C
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# ELECTRONIC CASE FILE

Case Reclassification

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11/13/2003 RUN BY:

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	Case Reclassification of Documents 161L-HQ-1337020		
Case ID (with new class)	Documents	Old Class : 161B	
161L-HQ-1337020	38		
Total Documents Reclassified :	38		
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# ACS BATCH LIBRARY

Case Reclassification

11/13/2003

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Case Reclassification

\*\*\*\*\* Statistical Information from Universal Index \*\*\*\*\*

Old Case ID: 161B-HQ-1337020New Case ID: 161L-HQ-1337020Mains: 2References: 0Total records processed:2

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD	
NEW HAVEN	BUREAU	11/19/2003	11/17-19/2003	
TITLE OF CASE		REPORT MADE BY	TYPED BY	
SAMUEL WRIGHT BODMAN, III		IA CHARACTER OF C LEVEL II-PA	mas	

<u>REFERENCE:</u> Bureau EC to Boston, et al, 11/10/2003.

# ADMINISTRATIVE:

A check of New Haven Office indices proved negative for the candidate and listed relative.

All investigation requested of New Haven has been completed.

APPROVED MAN	1/Rh	SPECIAL AGENT IN CHARGE	DO NOT WRITE IN SPACES BELOW			
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# UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of: Date:	IA 11/19/2003	Office:	NEW	HAVEN	b6 b7С
Case ID #:	161L-HQ-1337020				

Title: SAMUEL WRIGHT BODMAN, III

Character: LEVEL II-PAS

Synopsis: Criminal conducted and negative.

# DETAILS:

## LAW ENFORCEMENT AGENCIES

On November 17, 2003, Records Clerk Records Division, Greenwich, Connecticut, Pol	
Department advised she could locate no record ident	
	date of
birth	

-1\*-

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# FEDERAL BUREAU OF INVESTIGATION

Preceder	nce: DEADLINE 1	.2/05/2003	Date:	11/20/2003	
WTW TO: Adn	ninistrative Ser	vices Attn:	SIGBIU. Ro	b	56 57C
From: I	Detroit Squad 6/OCRA <b>Contact:</b> IA			م 	<i>,,</i> ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
Approved	l By:			b6 b7С	
Drafted	By:	: Water	/		
Case ID	<b>#:</b> 161L-HQ-1337	020 (Pending)	40		
Title:	SAMUEL WRIGHT B LEVEL II-PAS	ODMAN, III			

Synopsis: Background investigation.

Administrative: Reference Administrative Services communication to Detroit, dated 11/10/2003.

**Details:** A review of FBI Detroit general and automated indices was conducted regarding appointee. This review failed to reflect any identifiable references.

All investigation in the Detroit Division is completed.

**\*** 

CC DESTROYED

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# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD	
WFO/SQUAD A-2	FBIHQ	11/25/2003	11/20/2003-11/24/20	203 _
TITLE OF CASE		REPORT MADE BY		TYPED BY
		PSS		dbg
		CHARACTER OF C	ASE	b6
SAMUEL WRIGHT BC	DMAN		LEVEL II PAS	b7C
				ØJBG

REFERENCE: Bureau EC to WFO, et al, dated 11/12/2003.

# -PENDING-

# ADMINISTRATIVE: BUDED: 12/05/2003

Where appropriate, Privacy Act (e) (3) data was furnished to persons interviewed. Express promises of confidentiality, both limited and unlimited have been noted where granted.

<u>WFO E</u>lectronic Indices checks were conducted by on b6 11/18/2003, concerning SAMUEL WRIGHT BODMAN

b7C

b6

b7C

The searches were negative.

WFO General Indices checks were conducted by on 11/21/2003, concerning SAMUEL WRIGHT BODMAN,

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3/Bh

This report is submitted pending due to an outstanding lead at the National Park Service Police Department and the Department of Commerce.

# UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

Report of: Date:	PSS 11/25/2003	Office: WFO	b6 b7С
Case ID #:	161L-HQ-1337020		
Title:	SAMUEL WRIGHT BODMAN, III		

Character: LEVEL II PAS

Synopsis:

DMV/DC and MPD/DC records were checked regarding BODMAN, III. United States Secret Service, Department of Justice/Public Integrity Section, United States Attorney's Offices DC/VA and the White House records were also checked regarding BODMAN, III.

- PENDING -

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WFO 161L-HQ-1337020 ADD:add

#### RECORD CHECK

GOVERNMENT OF THE DISTRICT OF COLUMBIA Department of Motor Vehicles 65 K Street, Northeast Washington, D.C.

On November 24, 2003, Investigative Analyst (IA) conducted a computerized search of the files at the Government of the District of Columbia, Department of Motor Vehicles, Washington, D.C., in an effort to obtain a driving record concerning SAMUEL WRIGHT BODMAN, SSN: 329327756

A review of the five year records disclosed that SAMUEL WRIGHT BODMAN was issued a District of Columbia Drivers Permit on November 28, 2001, #329327756. The Permit expires on November 26, 2006. Ъ6 Ъ7С WFO 161L-HQ-1337020 DBG 1

# RECORD CHECK

METROPOLITAN POLICE DEPARTMENT Washington, D. C.

On November 20, 2003, \_\_\_\_\_\_ initiated a b6 computerized search, Washington Area Law Enforcement System (WALES) located within WFO Communication Center, to check the records at the Metropolitan Police Department, Washington, D. C., concerning SAMUEL WRIGHT BODMAN born January 26, 1938. No record was located concerning BODMAN. WFO 161L-HQ-1337020 CH:ch

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#### RECORD CHECK

#### DEPARTMENT OF JUSTICE

Public Integrity Section 1400 New York Avenue, Northwest Washington, D.C.

On November 20, 2003, Investigative Analyst (IA) initiated a search of the records at the Public Integrity Section in an effort to locate any information regarding, SAMUEL WRIGHT BODMAN.

On the same date, advised a review of the integrity files revealed no identifiable record concerning BODMAN or any affiliations. b6 b7c

<u>1</u>

161L-HQ-1337020 JRW:jrw <u>1</u>

#### RECORD CHECK

UNITED STATES SECRET SERVICE (USSS) Investigative Support Division (ISD) 950 G Street, Northwest Washington, D.C.

On November 20, 2003, Investigative Analyst (IA) requested a search be made of the files at the above agency concerning, SAMUEL WRIGHT BODMAN, SSAN: 392-32-7756.

On November 24, 2003, b6 advised a query of the Master Central Index System disclosed, b7c BODMAN is a White House Pass Holder, and that no criminal record was located regarding the appointee.

No additional information was available.

161L-HQ-1337020 EMD:emd 1

## ARREST CHECK

UNITED STATES DEPARTMENT OF JUSTICE Office of the United States Attorney District of Columbia Judiciary Center 555 Fourth Street, N.W., Washington, D.C.

On November 20, 2003, Investigative Analyst (IA) contacted the above agency concerning SAMUEL WRIGHT BODMAN.

U.S. Attorney's Office, b6 Narcotics, Public Corruption, Economic Crime, Transnational and b7C Major Crimes Unit, advised IA that no identifiable record could be located regarding BODMAN.

U.S. Attorney's b6 Office, Civil Division, advised IA that no identifiable b7c record could be located regarding BODMAN.

It should be noted that the index system of the Civil Division, U.S. Attorney's Office (USAO) contains only names of plaintiffs, except in civil actions brought by the United States against a particular defendant. Suits against government employees who are represented by the United States Attorney would be filed by plaintiff's name and docket number. 161L-HQ-1337020 DMR:dmr

### RECORD CHECK

UNITED STATES ATTORNEY'S OFFICE Eastern District of Virginia 2100 Jamieson Avenue <u>Alexandria, Virginia</u>

On November 20,2003, Investigative Analyst	(IA)	
contacted	, United	Ъ6
States Attorney's Office (USAO), Eastern District of	Virginia,	b7C
concerning SAMUEL WRIGHT BODMAN; SSAN: 329-32-7756.	,	

On November 21, 2003, conducted a search of all b6 pending/closed civil and criminal indexes. The search disclosed b7C the following:

A search of the database, which covers the period from 1985 to the present and encompasses the Alexandria, Newport News, Norfolk and Richmond regional area in addition to the United States Magistrate Courts, disclosed no record concerning BODMAN.

further advised that an additional search of their Index card System which covers the period prior to 1985 revealed no record concerning BODMAN. 161L-HQ-1337020 JRW:jrw <u>1</u>

WHITE HOUSE OFFICIAL PERSONNEL FOLDER Office of Human Resources Management Office of Administration Executive Office of the President 1800 G Street, Northwest Washington, D.C.

The following investigation was conducted by b6 Investigative Analyst (IA) , on November 21, b7c 2003, concerning SAMUEL WRIGHT BODMAN.

A review of files at New Executive Office Building, Office of Human Resource Management revealed no record of an OPF for BODMAN. 161L-HQ-1337020 JRW:jrw 1

#### WHITE HOUSE OFFICE CHECK

Office of the Executive Clerk Office of Administration Executive Office of the President Room 4 Old Executive Office Building Washington, D.C.

The following investigation was conducted by Investigative Analyst (IA) on November 21, b6 2003, concerning SAMUEL WRIGHT BODMAN.

A search of the index cards and the computer data base of the Executive Clerk's Office of the White House revealed the following information:

#### NOMINATED/APPOINTED TITLE

Nominated: 06/18/01 Deputy Secretary of Commerce Appointed: 07/25/01 Deputy Secretary of the Treasury

Note, all information located in the index cards has been provided. The index cards and the computer data base are searched by name only.

No additional information was furnished.

# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD		
RICHMOND	BUREAU	11/24/2003 REPORT MADE BY	11/18/2003	TYPED BY	
SAMUEL WRIGHT BODM	AN, III	IA CHARACTER OF C LEVEL II-PA		lac for be	Ъ6 Ъ7С

Reference: Bureau EC to Boston dated 11/10/2003.

-RUC-

<u>Administrative</u>: Richmond indices negative regarding candidate and relatives of candidate.

APPROVED	Joh	SPECIAL AGENT IN CHARGE		DO NOT WRITE IN SPACES BELOW	v
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# FEDERAL BUREAU OF INVESTIGATION

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REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE F	PERIOD	
MIAMI	ADMIN SERVICES	12/05/2003	12/3/2003	- 12/5/2003	
TITLE OF CASE		REPORT MADE BY		TYPED BY	
SAMUEL WRIGHT BODM LEVEL II-PAS	AN, III	IA CHARACTER OF C LEVEL II-PA BUDED: 12/	.S		b6 b7С

### Reference

Administrative Services EC to Miami dated 11/10/2003.

# <u>Administrative</u>

On December 3, 2003, a check of the Miami's manual and electronic indices did not reflect any information of a derogatory nature regarding the candidate, SAMUEL WRIGHT BODMAN, III.

Miami's lead is complete.

APPROVED	RUN	SPECIAL AGENT IN CHARGE	E	OO NOT WRITE IN S	SPACES BELOW		
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FD-204 (Rev. 12-1-95)

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# UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:		
Report of: Date:	IA Office: MIAMI b6 12/05/2003 b70	
Case ID #:	161L-HQ-1337020	
Title:	SAMUEL WRIGHT BODMAN, III	
Character:	LEVEL II-PAS	
Synopsis:	United States Attorney's Office (USAO) and local arrest checks were conducted regarding the candidate with negative results.	
	On December 3, 2003, United States Attorney's Office (USAO), Southern Distric of Florida, advised there is no federal prosecutive acti (civil or criminal) in closed or current files involving the candidate, SAMUEL WRIGHT BODMAN, III.	lon
I	On December 4, 2003, conducted arrest checks wi National Crime Information Center (NCIC) and Florida Cri Information Center (FCIC) with negative results regardin SAMUEL WRIGHT BODMAN, III, date of birth: 11/26/1938.	lme
	On December 4, 2003, IA conduct arrest checks through the Palm Beach County Automated La Enforcement Management System (PALMS) with the Palm Beac Sheriff's Office, with negative results reading, SAMUEL WRIGHT BODMAN, III, date of birth: 11/26/1938.	aw b7C

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# FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD
WFO/A-1	BUREAU	12/05/03	11/12/03 - 12/1/03
TITLE OF CASE SAMUEL WRIGHT	BODMAN, III	REPORT MADE BY PSS CHARACTER OF C. LEVEL II-	Bic

REFERENCE: Bureau EC dated 11/10/03

(RUC)

# ADMINISTRATIVE: BUDED 12/05/03

All individuals were furnished the appropriate provisions of the Privacy Act. Express promises of confidentiality, both limited, and unlimited, have not been granted.

APPROVED MAM	SPECIAL AGENT IN CHARGE	DO NOT WRITE IN SPACES BELOW			,	
COPIES MADE: 2 BUREAU (161L-HQ-13 PSO 1-WFO	37020),44					b6 b7С
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FD-204 (Rev. 12-1-95)

# UNITED STATES DEPARTMENT OF JUSTICE Federal Bureau of Investigation

Copy to:

b6 PSS Office: WFO Report of: b7C December 05, 2003 Date: 161L-HQ-1337020 Case ID #: SAMUEL WRIGHT BODMAN, III

Title:

Character: LEVEL II - PAS

Synopsis:

Appointee was interviewed. Employment at United Department of Commerce verified favorably. Residence favorably verified.

· (RUC)

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#### FEDERAL BUREAU OF INVESTIGATION

Date of transcription 12/01/2003

SAMUEL WRIGHT BODMAN, III, the appointee, Secretary of Commerce, 14 Constitution Avenue, N.W., Room 5838, Washington, D.C., telephone (202) 482-8376, was advised of the official identity of the interviewing Agent and the purpose of the interview, that being to insure that complete and accurate current information is available and obtained concerning the appointee to assist the Federal Bureau of Investigation (FBI) in conducting a thorough background investigation of the appointee for the position with the Federal Government for which the appointee is being considered. The appointee was advised of the scope of the questions asked during this interview would go back to the appointee's last investigation which was completed in June, 2001. The appointee provided the following information:

The appointee was shown a copy of the Standard Form-86 (SF-86) and supplement both dated November 4, 2003, in which the appointee has completed and signed. Each of the appointee's answers to the questions on the SF-86 were reviewed with the appointee to insure its accuracy and completeness. The appointee advised his written responses to each of the questions on the SF-86 and supplement which he had completed were accurate and correct to the best of his knowledge and recollection.

The appointee stated that regarding his current residence at 3025 Whitehaven Street, N.W., Washington, D.C., the exact move in date he could not supply. The appointee stated that he actually purchased the property in March, 2001 but due to minor renovation work such as painting, etc, he did not move into the Whitehaven Street address on a full-time basis until July, 2001. The appointee stated that between March and July, 2001 he would stay at the Whitehaven Street address a couple of days a week and he would stay also at his residence in Boston, Massachusetts, the rest of the time. The appointee stated that he listed July, 2001 as the move in date because that is when he moved in on a full-time basis.

The appointee stated that he indicated on his SF-86 that he left the CABOT CORPORATION in March, 2001, and began with the United States Department of Commerce in July, 2001. The appointee stated that between March and July he was waiting for final confirmation to his current position and that he was traveling to the different CABOT locations to say good-bye to the employees at

Investigation on	11/13/2003	at WASHING	GTON, D.C.			
File # 161L-	HQ-1337020			Date dictated	11/26/2003	
by SA		glg				Ь6 Ъ7С

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161L-HQ-1337020

Continuation of FD-302 of SAMUEL WRIGHT BODMAN III , On <u>11/13/2003</u>, Page 2

the different locations. The appointee stated that also during that time he was preparing for his new job at the Department of Commerce.

The appointee advised that he has not used, sold, purchased, manufactured, trafficked in, produced, transferred, shipped, received, or sold any illegal drug substance including marijuana. The appointee stated that he has not abused prescription drugs or alcohol.

The appointee advised that he has not had any financial problems which resulted in, but were not limited to, property being repossessed, debts placed for collection, filing for bankruptcy, nor has he been the subject of a tax lien or legal judgment rendered concerning debt or have any delinquent student loans.

The appointee advised that he has not been involved in any civil matter as a plaintiff or defendant.

The appointee advised that he has not been in any criminal matters as suspect or subject, nor has he ever been arrested for, charged with, or convicted of any criminal offense.

The appointee advised that he is not involved in any organization which advocates the use of force to overthrow the United States Government, or any involvement in the commission of sabotage, espionage, or the assistance of others in terrorism.

The appointee advised that he has not denied employment, dismissed from any employment or left any employment under unfavorable circumstances or been denied any security clearance by any agency within the Federal Government.

The appointee advised that he has not had any personal or continuing contacts with representatives of any foreign nation outside the scope of his duties.

The appointee advised he has not received any type of psychological or psychiatric treatment or counseling.

The appointee advised he has not been the subject of any professional complaints or non-judicial disciplinary action to the best of his knowledge.

161L-HQ-1337020

Continuation of FD-302 of SAMUEL WRIGHT BODMAN III , On <u>11/13/2003</u>, Page <u>3</u>

The appointee advised he has not been involved with any business or investment circumstances that could involve, or have involved conflict of interest allegations.

The appointee advised that he is not the member of any organization which restricts membership based upon sex, race, religion or national origin.

The appointee advised that he is current on all Federal, state and local tax obligations. The appointee advised he has not paid back taxes or nor has he paid delinquent taxes.

The appointee advised that he is not concealing any activity or conduct that could be used to influence, pressure, coerce or compromise him in anyway, or that could have an adverse impact on his character, judgment, stability, discretion, trustworthiness or responsibility.

The appointee advised that his oral responses to the above questions are true and correct to the best of knowledge and recollection. The appointee advised he is not aware of anything that could, would, or should prevent him from receiving a position with the United States Government or could be used to coerce or compromise him if he were to receive such a position.



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161L-HQ-1337020 JLM:sas

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#### EMPLOYMENT

U.S. Department of Commerce 14 Constitution Avenue, NW Washington, D.C. July, 2001 - Present

The following investigation was conducted by Special Agent (SA) between November 13, and b6 November 20, 2003 regarding the appointee, SAMUEL WRIGHT BODMAN, b7c III.

Secretary, Department of Commerce b6 advised that he has known the appointee for about 13 years. b7c stated that his association with the appointee is mainly on a professional, but he does know the appointee, semi-socially. described the appointee as being a "top notch" individual who is extremely hardworking, dependable, trustworthy and confident.

Secretary of commerce, advised that she has known the appointee since 2001. Stated that her association with the appointee is on a professional and a semi-social basis. described the appointee as being a very personable individual who is likeable, hardworking, dependable and very easy to get along with.

of Commerce advised that she has known the appointee since b7c December of 2000. stated that her association with the appointee is strictry processional. described the appointee as being "the best," very honest, competent, trustworthy, and personable.

	<u>_lof Comm</u> erce advised that he	
has known the appointee since 2001.	stated that his	b6
association with the appointee is b	oth professional and semi-	b7C

161L-HQ-1337020 JLM:sas

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b6 social. described the appointee as being a very b7C competent, hardworking, dedicated and likeable individual. **b**6 Department of Commerce b7C advised that she has known the appointee for two years. stated that he<u>r associa</u>tion with the appointee is strictly described the appointee as, "top notch" professional. individual who is very likeable, easy to get along with, and a very well respected individual. for b6 Economic Affairs advised that she has known the appointee since b7C stated that her association with the appointee 2001. is strictly proressional. stated the appointee is very competent, energetic, honest, trustworthy and dependable. advised that she has known the appointee for a year and a half. **b**tated that her association with the appointee is strictly professional. b6 \_added that the only social contact that she has had b7C with the appointee is that she and the appointee have traveled together on business and that they have had dinner together while traveling. described the appointee as the type of individual who is extremely hardworking, trustworthy, competent, and a very well regarded individual. Department of Commerce, advised that he has known the appointee for three years. b6 stated his association with the appointee is both b7C proressional and social. described the appointee as being a person of high integrity who is a great intellect, honest, hardworking, energetic, trustworthy and dependable. for Oceans and of the National Oceanic and Atmospheric the Administration advised that he has known the appointee for about **b6** forty years. stated that he and the appointee were b7C classmates together at the Massachusetts Institute of Technology, that they have participated in many intermural sports together and that the appointee formerly was on the Board of Trustees for founded called ERT Incorporated. a company that Dr. tated that the vast majority of his association with the appointee has been on a professional basis but he does know the appointee semi-socially. \_\_\_\_\_ stated that the appointee has an outstanding reputation, is a very intelligent, trustworthy,

161L-HQ-1337020 JLM:sas

well respected and "a top rate individual."

While being interviewed all of the above listed individuals stated they knew of nothing derogatory about the appointee. None of the individuals contacted had any knowledge of the appointee ever using, selling, purchasing, manufacturing, trafficking in, producing, transferring, shipping, or receiving any illegal drug substance, including marijuana. All the above listed individuals stated they had no knowledge of the appointee ever abusing prescription drugs or alcohol.

According to all the above listed individuals there was no reason to question the appointee's character, associates, reputation or loyalty to the U.S. Government. All the above listed individuals added they feel the appointee is good physical condition, is emotionally and financially stable and is an unbiased person. None of the individuals listed above had any reason whatsoever with the appointee being around or handling classified or sensitive material.

All the above listed individuals added they know of nothing that could be used to blackmail or coerce the appointee. In closing all the above listed individuals stated they would recommend the appointee for a position of trust with the U.S. Government.



161L-HQ-1337020 JLM:glg

RESIDENCE

1

3025 Whitehaven Street, N.W. Washington, D.C. July, 2001 - Present

Agent \_\_\_\_\_\_ between November 21 and December 1, b6 2003, regarding the appointee SAMUEL WRIGHT BODMAN, III:

D.C., advised that he could verify the above listed residence. stated that he is the property and house manager at 3041 Whitehaven Street, N.W., Washington, D.C., which is the BRADY residence. stated that he also does some work at the appointee's residence at 3025 Whitehaven Street, N.W.

stated that the appointee has lived at the stated that Whitehaven Street address since July, 2001. the appointee is a very friendly individual who is responsible, **b6** honest and likeable. stated that his association with the b7C appointee is on a professional and a semi-social basis. stated he knows of nothing derogatory about the appointee. stated that he had no knowledge of the appointee ever using, selling, purchasing, manufacturing, trafficking in, producing, transferring, shipping, receiving, or selling any illegal drug substance, including marijuana. stated he had no knowledge of the appointee ever abusing alconor or prescription drugs.

According to \_\_\_\_\_\_ there is no reason to question the appointee's character, associates, reputation or loyalty to the United States Government. \_\_\_\_\_\_ stated he would have no concerns whatsoever with the appointee being around or handling classified or sensitive documents.

stated in his opinion the appointee appears to be in good physical condition, is emotionally and financially stable and is an unbiased person. Was unaware of anything that could be used to blackmail or coerce the appointee. stated that he would recommend the appointee for a position of trust with the United States Government.

It shou	ld be noted that attempts to contact listed			
resident verifier				
	has had negative results. <u>On November 21, 2003</u>			
	attempted to contact vas advised			
that was traveling with t <u>he Vice-Pre</u> sident. On				
	Special Agent once again attempted to			
contact , ho	wever there wa <del>s no respon</del> se either			

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telephonically or atresidence.On December 1, 2003b6attempts to contacdetermined thatwas outb7cof the country on vacation and not available for comment.