Brian Foucart

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FOR DISTRICT OF COLUMBIA CIRCUIT

UNITED STATES COURT OF APPEALS ER, CASSIDY, LARROCA & LEWIN, L.L.P.

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September 27, 2000

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> Final Report re In re: Madison Guaranty Savings & Loan Association Re: (In re: William David Watkins and In re: Hillary Rodham Clinton)

Dear Mr. Ray:

I write on behalf of my client, Brian Foucart, in response to your report summarizing the Independent Counsel's investigation of the White House Travel Office matter.

At pages 130-131 of your report, there is discussion of a meeting attended by Vince Foster that purportedly occurred prior to May 14, 1993. The report states that Matt Moore testified that Peter Segal, Paul Toback and himself were present at the meeting, as well as possibly others. Among the "others" Mr. Moore reportedly testified might possibly have been in attendance was Mr. Foucart. As Mr. Foucart has previously testified, however, he never attended any meetings at which Mr. Foster was present.

At page 134 of the report there is a description of events surrounding a Peat Marwick review of a specific petty cash disbursement by the Travel Office. A footnote to this section (footnote 585) states that Mr. Herman occasionally reported findings regarding cash transactions to Ms. Thomasson, Ms. O'Connor and/or Mr. Foucart. While Mr. Foucart was aware that there were issues regarding the handling of the petty cash fund, and while Mr. Herman did occasionally report his activities to Mr. Foucart, this specific petty cash disbursement was never brought to Mr. Foucart's attention.

Robert Ray, Esq. September 27, 2000 Page 2

At page 171 of the report there is discussion of a meeting that Mr. Foucart purportedly may have attended. Mr. Foucart has no recollection of having attended this meeting.

At page 178 of the report there is discussion of Ms. Cerda's recollection of events surrounding Mr. Dale's possession of Ms. Cornelius' memo of February 15, 1993 regarding the Travel Office. A footnote to this section (footnote 774) contains a lengthy description by Ms. Cerda of a conversation between Mr. Dale and Mr. Foucart, to which Ms. Cerda was not a party, in which Mr. Dale supposedly threatened Mr. Foucart and/or the White House. Mr. Foucart has repeatedly testified that although Mr. Dale showed him the memo, they did not discuss it in any detail and Mr. Dale did not threaten anyone.

At page 182 of the report (and again in footnote 802), there is discussion of testimony that Mr. Foucart supposedly urged Ms. Cornelius to resign. He did not. While Mr. Foucart called Ms. Cornelius at Mr. Watkins' request, he merely pointed out that she could avoid continuing to be in the public spotlight by taking an available job at the DNC for which she was well qualified.

At page 184 of the report, there is additional discussion of conversations between various persons, including Ms. Cerda and Mr. Sloan, regarding Ms. Cornelius' continued employment at the White House. Mr. Foucart had no knowledge of any of those conversations at the time, nor does he have any knowledge of them now.

Randall J. Turk

Sincerely yours

RJT/dlg