

APPENDIX 4

**TOTAL LOANS, ADVANCES, AND REPAYMENTS MADE BY AND TO THE
CLINTONS, THE McDOUGALS, AND McDOUGAL CONTROLLED ENTITIES
TOWARDS THE WHITEWATER VENTURE; ERRORS FOUND IN THE
LYONS REPORT BY THE INDEPENDENT COUNSEL**

I. TOTAL LOANS, ADVANCES, AND REPAYMENTS MADE BY AND TO THE CLINTONS TOWARDS THE WHITEWATER VENTURE.

The following schedule is a complete reconstruction of loans, advances, and repayments involving the Whitewater venture and the Clintons from 1979 until 1991 based on available records.¹ The list was assembled by professional accountants and investigators detailed to this Office, including agents from the IRS and the FBI. Loans and advances appear in regular type while repayments are listed in parentheses.

FISCAL YEAR	DATE	PAYOR	AMOUNT
1979	12/28/78	Hillary Rodham	\$10,130.58 ²
1980	11/07/79	Not Identified	\$4,599.64 ³
1980	12/7/79	Not Identified	\$2,400.00 ⁴
1980	12/29/79	Hillary Rodham	\$4,752.88 ⁵
1981	8/5/80	Not Identified	\$4,350.00 ⁶
1981	8/23/80	Hillary Rodham	\$9,000.00 ⁷
1982	2/16/82	Not Identified	\$269.00 ⁸
1982	2/22/82	Blenda Howard	\$(5,691.20) ⁹
1983	11/15/82	Madison Guaranty	\$27,600.00 ¹⁰
1983	7/11/83	Chris Wade	\$(25,000.00) ¹¹
1983	8/1/83	James B. McDougal Trustee	\$(2,600.00) ¹²
1987	12/30/86	HR Clinton	\$1,635.51 ¹³
1988	4/11/88	HR Clinton	\$665.03 ¹⁴
1989	10/28/88	HR Clinton	\$1,275.15 ¹⁵
1990	10/9/89	HR Clinton	\$291.35 ¹⁶
1991	6/21/90	Carolyn Huber	\$345.15 ¹⁷
1991	1/12/91	HR Clinton	\$2,839.24 ¹⁸
Total Contributions – Repayments Made by the Clintons (FYs 1979-1991)			\$36,862.33

II. TOTAL LOANS, ADVANCES, AND REPAYMENTS MADE BY AND TO THE McDUGALS, THROUGH THEMSELVES AND ENTITIES THEY CONTROLLED, TOWARDS THE WHITEWATER VENTURE.

The following schedule, which was reconstructed by OIC investigators, reflects the loans, advances, and repayments involving the Whitewater venture, the McDougals, and McDougal-controlled entities from 1978 until 1992 based on available records. The list was assembled by professional accountants and investigators detailed to this Office, including agents from the IRS and the FBI. Loans and advances appear in regular type while repayments are listed in parentheses.

FISCAL YEAR	DATE	PAYOR	AMOUNT
1979	2/5/79	Great Southern	\$225.13 ¹⁹
1979	5/5/79	Great Southern	\$4,452.70 ²⁰
1980	6/28/79	Great Southern	\$999.99 ²¹
1980	8/9/79	Great Southern	\$4,577.78 ²²
1980	9/18/79	Great Southern	\$517.81 ²³
1980	12/11/79	Great Southern	\$(1,100.00) ²⁴
1980	12/20/79	James B. McDougal	\$573.42 ²⁵
1980	2/21/80	Flowerwood Farms	\$1,000.00 ²⁶
1980	5/5/80	James B. McDougal	\$4,000.00 ²⁷
1980	5/31/80	Great Southern	\$25,874.88 ²⁸
1981	6/11/80	Whitewater Development	\$(1,000.00) ²⁹
1981	6/23/80	Great Southern	\$700.00 ³⁰
1981	7/15/80	James B. McDougal	\$1,200.00 ³¹
1981	7/15/80	Great Southern	\$400.00 ³²
1981	8/5/80	James B. McDougal	\$243.13 ³³
1981	8/18/80	Smith-Tucker-McDougal	\$2,000.00 ³⁴
1981	8/25/80	Smith-Tucker-McDougal	\$910.00 ³⁵

FISCAL YEAR	DATE	PAYOR	AMOUNT
1981	8/25/80	Smith-Tucker-McDougal	\$266.53 ³⁶
1981	9/1/80	Great Southern	\$4,000.00 ³⁷
1981	9/1/80	James B. McDougal	\$(5,000.00) ³⁸
1981	9/27/80	Pembroke Manor	\$32,000.00 ³⁹
1981	10/8/80	Smith-Tucker-McDougal	\$(3,176.53) ⁴⁰
1981	10/17/80	McDougal & Associates	\$4,000.00 ⁴¹
1981	11/15/80	James B. McDougal	\$3,800.00 ⁴²
1981	12/16/80	James B. McDougal	\$2,000.00 ⁴³
1981	12/31/80	Pembroke Manor	\$(28,000.00) ⁴⁴
1981	2/12/81	Great Southern	\$1,200.00 ⁴⁵
1981	2/13/81	Great Southern	\$500.00 ⁴⁶
1981	5/6/81	Great Southern	\$170.02 ⁴⁷
1982	9/14/81	Pembroke Manor	\$(7,000.00) ⁴⁸
1982	9/15/81	James B. McDougal	\$(10,000.00) ⁴⁹
1982	11/5/81	James B. McDougal	\$(100.00) ⁵⁰
1982	12/2/81	James B. McDougal	\$(1,000.00) ⁵¹
1982	12/10/81	James B. McDougal	\$(500.00) ⁵²
1982	12/24/81	Tucker-Smith-McDougal	\$675.00 ⁵³
1982	1/8/82	Great Southern	\$1,450.00 ⁵⁴
1982	2/18/82	James B. McDougal	\$(1,000.00) ⁵⁵
1982	2/22/82	Rolling Manor	\$766.85 ⁵⁶
1982	3/24/82	Great Southern	\$334.77 ⁵⁷
1983	6/1/82	Great Southern	\$488.00 ⁵⁸
1983	6/9/82	James B. McDougal	\$(741.62) ⁵⁹
1983	7/7/82	James B. McDougal	\$258.14 ⁶⁰
1983	8/9/82	James B. McDougal	\$258.14 ⁶¹
1983	8/11/82	James B. McDougal	\$258.14 ⁶²

FISCAL YEAR	DATE	PAYOR	AMOUNT
1983	8/25/82	James B. McDougal	\$(1,560.00) ⁶³
1983	9/17/82	James B. McDougal	\$(90.00) ⁶⁴
1983	10/7/82	Whitewater Development	\$(120.00) ⁶⁵
1983	10/13/82	James B. McDougal	\$(2,800.00) ⁶⁶
1983	10/19/82	James B. McDougal	\$(262.00) ⁶⁷
1983	10/21/82	James B. McDougal	\$(335.66) ⁶⁸
1983	10/28/82	James B. McDougal	\$(355.00) ⁶⁹
1983	10/29/82	James B. McDougal	\$(264.19) ⁷⁰
1983	11/4/82	James B. McDougal	\$(1,164.31) ⁷¹
1983	7/11/83	Chris Wade	\$25,000.00 ⁷²
1983	11/29/82	James B. McDougal	\$(491.21) ⁷³
1983	12/21/82	Flowerwood Farms	\$1,500.00 ⁷⁴
1983	12/27/82	James B. McDougal	\$400.00 ⁷⁵
1983	2/14/83	Great Southern	\$99.00 ⁷⁶
1983	3/27/83	Great Southern	\$300.00 ⁷⁷
1984	8/6/83	James B. McDougal	\$(5,000.00) ⁷⁸
1984	10/19/83	James B. McDougal	\$18,584.28 ⁷⁹
1984	2/14/84	James B. McDougal	\$(600.00) ⁸⁰
1984	4/13/84	James B. McDougal	\$(7,000.00) ⁸¹
1985	8/28/84	Tucker-Smith- McDougal	\$(750.00) ⁸²
1985	10/25/84	James B. McDougal	\$200.00 ⁸³
1985	10/26/84	Great Southern	\$650.00 ⁸⁴
1985	10/26/84	Pembroke Manor	\$1,700.00 ⁸⁵
1985	10/26/84	Tucker-Smith- McDougal	\$7,500.00 ⁸⁶
1985	10/26/84	Smith - McDougal	\$500.00 ⁸⁷
1985	11/6/84	Flowerwood Farms	\$12,000.00 ⁸⁸
1985	11/19/84	Madison Marketing	\$5,566.39 ⁸⁹

FISCAL YEAR	DATE	PAYOR	AMOUNT
1985	12/6/84	James B. McDougal	\$280.00 ⁹⁰
1985	12/6/84	Tucker-Smith-McDougal	\$1,600.00 ⁹¹
1985	12/6/84	Rolling Manor	\$330.00 ⁹²
1985	12/6/84	Pembroke Manor	\$7,100.00 ⁹³
1985	1/9/85	Smith - McDougal	\$400.00 ⁹⁴
1985	1/10/85	Flowerwood Farms	\$1,430.00 ⁹⁵
1985	1/10/85	Pembroke Manor	\$730.00 ⁹⁶
1985	1/10/85	Rolling Manor	\$1,500.00 ⁹⁷
1985	1/10/85	Tucker-Smith-McDougal	\$600.00 ⁹⁸
1985	1/28/85	Flowerwood Farms	\$1,000.00 ⁹⁹
1985	3/12/85	Rolling Manor	\$1,900.00 ¹⁰⁰
1985	3/12/85	Pembroke Manor	\$900.00 ¹⁰¹
1985	3/12/85	Tucker-Smith-McDougal	\$2,500.00 ¹⁰²
1985	3/13/85	Tucker-Smith-McDougal	\$500.00 ¹⁰³
1985	3/22/85	Madison Guaranty	\$(25,000.00) ¹⁰⁴
1985	4/9/85	Flowerwood Farms	\$24,455.90 ¹⁰⁵
1985	4/19/85	James B. McDougal	\$(30,000.00) ¹⁰⁶
1985	4/30/85	James B. McDougal	\$30,000.00 ¹⁰⁷
1985	5/14/85	James B. McDougal	\$(25,000.00) ¹⁰⁸
1986	7/2/85	James B. McDougal	\$1,500.00 ¹⁰⁹
1986	9/24/85	James B. McDougal	\$(300.00) ¹¹⁰
1986	10/10/85	Flowerwood Farms	\$(100.00) ¹¹¹
1986	11/8/85	Madison Marketing	\$7,500.00 ¹¹²
1986	11/19/85	Tucker-Smith-McDougal	\$(400.00) ¹¹³
1986	1/17/86	Tucker-Smith-McDougal	\$(300.00) ¹¹⁴
1986	2/11/86	Tucker-Smith-McDougal	\$(300.00) ¹¹⁵

FISCAL YEAR	DATE	PAYOR	AMOUNT
1986	3/18/86	James B. McDougal	\$(200.00) ¹¹⁶
1986	5/31/86	James B. McDougal	\$17,183.58 ¹¹⁷
1986	5/31/86	Flowerwood Farms	\$(11,117.19) ¹¹⁸
1986	5/31/86	Madison Marketing	\$(5,566.39) ¹¹⁹
1986	5/31/86	Smith-McDougal	\$(500.00) ¹²⁰
1987	6/3/86	Flowerwood Farms	\$1,000.00 ¹²¹
1987	6/3/86	Rolling Manor	\$1,424.00 ¹²²
1987	7/7/86	James B. McDougal	\$(600.00) ¹²³
1987	7/25/86	James B. McDougal	\$(325.00) ¹²⁴
1987	8/28/86	Flowerwood Farms	\$(200.00) ¹²⁵
1987	11/6/86	James B. McDougal	\$2,303.78 ¹²⁶
1987	12/2/86	James B. McDougal	\$(1,200.00) ¹²⁷
1987	12/30/86	Rolling Manor	\$397.33 ¹²⁸
1987	12/31/86	Flowerwood Farms	\$1,422.59 ¹²⁹
1987	3/1/87	James B. McDougal	\$(620.80) ¹³⁰
1991	9/15/90	James B. McDougal	\$(3,477.70) ¹³¹
1991	11/21/90	James B. McDougal	\$(1,400.00) ¹³²
1991	1/14/91	James B. McDougal	\$(650.00) ¹³³
1991	4/19/91	My Paradise, Inc.	\$(200.00) ¹³⁴
1991	5/20/91	My Paradise, Inc.	\$(500.00) ¹³⁵
1991	5/21/91	James B. McDougal	\$(5,656.70) ¹³⁶
1991	5/22/91	My Paradise, Inc.	\$(1,300.00) ¹³⁷
1992	6/21/91	My Paradise, Inc.	\$(490.00) ¹³⁸
1992	7/3/91	James B. McDougal	\$(550.00) ¹³⁹
1992	7/16/91	Whitewater Development	\$(296.40) ¹⁴⁰
1992	9/3/91	James B. McDougal	\$(532.00) ¹⁴¹
1992	10/25/91	Whitewater Development	\$(76.85) ¹⁴²

FISCAL YEAR	DATE	PAYOR	AMOUNT
1992	10/28/91	Ozark Air	\$(678.00) ¹⁴³
1992	11/5/91	My Paradise, Inc.	\$(400.00) ¹⁴⁴
1992	11/22/91	My Paradise, Inc.	\$(76.85) ¹⁴⁵
1992	12/2/91	My Paradise, Inc.	\$(432.00) ¹⁴⁶
1992	12/11/91	My Paradise, Inc.	\$(924.00) ¹⁴⁷
1992	12/27/91	Ozark Escrow	\$(247.85) ¹⁴⁸
1992	12/27/91	Ozark Escrow	\$(173.00) ¹⁴⁹
1992	12/31/91	Ozark Air	\$(678.00) ¹⁵⁰
1992	2/14/92	Ozark Air	\$(246.00) ¹⁵¹
1992	4/3/92	Whitewater Development	\$(500.00) ¹⁵²
1992	4/6/92	Ozark Air	\$(678.00) ¹⁵³
1992	5/18/92	Ozark Air	\$(678.00) ¹⁵⁴
Total Contributions – Repayments (FY 1979 – 1992)			\$80,076.03

III. LOANS, ADVANCES, AND REPAYMENTS ERRONEOUSLY INCLUDED IN THE LYONS REPORTS.

Loans and advances appear in plain text, while repayments appear in parentheses.

FISCAL YEAR	DATE	SOURCE OF PAYMENT	AMOUNT
1979	11/5/78	Great Southern	\$4,752.88 ¹⁵⁵
1979	12/19/78	Great Southern	\$1,000.00 ¹⁵⁶
1979	12/28/78	Great Southern	\$(10,130.56) ¹⁵⁷
1979	1/27/79	Great Southern	\$2,076.28 ¹⁵⁸
1979	2/5/79	Great Southern	\$2,526.53 ¹⁵⁹
1979	4/17/79	Great Southern	\$(3,000.00) ¹⁶⁰
1979	5/31/79	Great Southern	\$276.90 ¹⁶¹
1979	6/6/79	Great Southern	\$(2,032.50) ¹⁶²
1979	7/3/79	Great Southern	\$(1,000.00) ¹⁶³

FISCAL YEAR	DATE	SOURCE OF PAYMENT	AMOUNT
1979	9/14/79	Great Southern	\$(5,000.00) ¹⁶⁴
1980	2/21/80	Great Southern	\$500.00 ¹⁶⁵
1981	4/20/81	Great Southern	\$99.00 ¹⁶⁶
1982	11/3/81	Edwina and Ray McCracken	\$939.33 ¹⁶⁷
1982	11/6/81	Great Southern	\$(99.00) ¹⁶⁸
1983	10/21/82	Edwina and Ray McCracken	\$872.50 ¹⁶⁹
1986	5/31/86	Tucker-Smith-McDougal	\$(1,000.00) ¹⁷⁰
1986	10/18/85	Ozark Air	\$1,200.00 ¹⁷¹
1989 - 1991	5/31/89 – 5/31/91	Great Southern	\$10,711.06 ¹⁷²
1991	5/31/91	Unknown	\$(4,144.98) ¹⁷³

¹ As noted in the Final Lyons Report, "in many instances, documentation as to various transactions was incomplete or unavailable due, in part, to the passage of time and record retention policies of financial institutions. In some cases, documents could not be located or simply do not exist." Final Lyons Report at 3 (Mar. 23, 1992).

² See Check No. 697 from the account of Bill Clinton and Hillary Rodham signed by Hillary Rodham payable to Great Southern Land Company Inc. for \$10,130.58 (Dec. 28, 1978) (Doc. No. DEK006616). Great Southern was a McDougal-controlled entity. The check served as a reimbursement for interest payments made by Great Southern on the Whitewater acquisition loans. The Clintons deducted this payment as an interest expense on their 1978 tax return. William J. & Hillary Clinton's Form 1040 (1978) (Doc. No. DEK 200501). This contribution was reported in the Lyons Report. See Final Lyons Report at 4 (Mar. 23, 1992).

³ See Clinton checkbook register entry for Check No. 346 payable to Citizens Bank & Trust Co. for \$4,599.64 (Nov. 7, 1979) (Doc. No. DEK011818). The check was noted "interest." The check served as an interest payment on Citizens Bank Loan No. 5885. This contribution was reported in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

⁴ See Union National Bank deposit ticket for the account of Whitewater Devel. Co. Inc. for \$2,900.00 noting, "Clinton" (Dec. 7, 1979) (Doc. No. DEK000402). This contribution was included in the Lyons Report. See Final Lyons Report at 4 (Mar. 23, 1992). The corporate books reflected that \$500 of this deposit was for the purchase of stock. Lyons treated the \$2,400.00 deposit and the \$500 stock purchase as separate and included both in his final total.

See Letter from Bill Lyons to David Kendall (Mar. 22, 1994) (Doc. Nos. 863-0000006 through 008).

⁵ See Check No. 396 from the account of Bill Clinton and Hillary Rodham signed by Hillary Rodham payable to Citizens Bank & Trust Co. for \$4,752.88 noting, "Interest Payment" (Dec. 29, 1979) (Doc. No. DEK006610). The payment was listed as an interest deduction on the Clintons' 1979 tax return. William J. Clinton and Hillary D. Rodham's Form 1040 (1979) (Doc. No. DEK000343). The contribution was also reported in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

⁶ According to the Lyons Report Workpaper dated Oct. 18, 1993, this payment may have related to an August 1980 interest payment on Whitewater Developments Citizens Bank Loan No. 5885. On Aug. 20, 1980, the McDougals made a payment of \$4,593.13 on Citizens Bank Loan No. 5885. Check No. 2373 from the account of James B. and Susan H. McDougal signed by James B. McDougal payable to Citizens Bank of Flippin for \$4,593.13 (Aug. 20, 1983) (Doc. No. 66-00008048). The Clinton deduction of \$4,350.00 may have been related to the reimbursement of this payment. The deduction is more likely, however, associated with a May 5, 1980, interest payment of \$4,352.63 made by Whitewater Development with that included a \$4,000 loan to Whitewater Development on that same day. No other documents related to this deduction were furnished to this Office, and no other documents were located during the investigation. This amount was reported on the Clintons' 1980 tax return as an interest deduction. William J. Clinton and Hillary Rodham's Form 1040 (1980) (Doc. No. DEK200346). This contribution was included in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

⁷ See Check No. 598 from the account of Bill Clinton and Hillary Rodham signed by Hillary Rodham payee left blank for \$9,000.00 (Aug. 23, 1980) (Doc. No. DEK000691). The payment went towards the principal rather than the interest on Citizens Bank Loan No. 5885. The Clintons deducted this payment as an interest expense on their 1980 tax returns. William J. Clinton and Hillary Rodham's Form 1040 (1980) (Doc. No. DEK200346). This contribution was included in the Lyons Report. See Final Lyons Report at 5 (Mar. 23, 1992).

⁸ See Bank of Kingston Deposit Ticket for the account of Whitewater Development Co., Inc. for \$269.00 noting, "Hillary Rodham \$269.00 Ins. premium" (Feb. 16, 1982) (Doc. No. DEK002661). The deposit reflected a repayment of an insurance premium to Whitewater Development by Mrs. Clinton. The Independent Counsel did not locate the canceled check for this deposit. This contribution was not included in the Lyons Report. See Final Lyons Report (Mar. 23, 1992) (Doc. Nos. 863-00000171-180).

⁹ See Check No. 133 from the account of Whitewater Development Co., Inc. signed by Blenda Howard payable to Citizens Bank for \$5,691.20 noting, "Note 585-270" (Feb. 22, 1982) (Doc. No. DEK500067). The check served as a repayment of Governor Clinton's personal loan at Citizens Bank, Loan No. 585-270, by Whitewater Development. This repayment to the Clintons was not included in the Lyons Report. See Final Lyons Report (Mar. 23, 1992) (Doc. Nos. 863-00000171 through 80).

¹⁰ This entry reflects the nominee loan taken out in Bill Clinton's name by Jim McDougal on November 15, 1982. See Check No. 924 cashier's check from the account of Madison Guaranty signed by John B. Thomas payable to "Bill Clinton" for \$27,600 (Nov. 15, 1982) (Doc. Nos. MD-00000001 through 03); see also Jim McDougal & Curtis Wilkie, Arkansas Mischief 195 (1996).

¹¹ This entry reflects the nominee loan made to Chris Wade by Madison Guaranty. See Cashiers Check No. 3678 from the account of Madison Guaranty signed by Diana Warren payable to Chris Wade for \$25,000.00 (July 11, 1983); see Check No. 298 from the account of Chris Wade or Rosalee Wade payable to Madison Guaranty for \$25,000.00 (July 15, 1985) (Doc. No. 339-00000681).

¹² This entry reflects the final payment on principal made by the McDougals to retire the loan taken out in Bill Clinton's name on November 15, 1982. See Madison Guaranty handwritten ledger (Doc. No. 174-00235453); credit ledger for \$5,081.82 noting, "23337-01 WW" (Doc. No. 54-17853-00000247).

¹³ See Check No. 1623 from the account of Bill and Hillary Rodham Clinton signed by HR Clinton payable to Security Bank for \$1,635.51 (Dec. 30, 1986) (Doc. No. DEK006629). The check reflected an interest payment on Security Bank Loan No. 957585, which was taken out to finance the Lot 13 modular home. This contribution was included in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

¹⁴ See Check No. 2159 from the account of Bill and Hillary Rodham Clinton signed by HR Clinton payable to Security Bank for \$665.03 noted "Interest on note"(Apr. 11, 1988) (Doc. No. SBP 0059). It reflected an interest payment on the loan taken out to finance the modular home on lot 13. This contribution was included in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

¹⁵ See Check No. 2353 from the account of Bill Clinton or Hillary Rodham Clinton signed by HR Clinton payable to Ozarks Realty Co. for \$1,275.15 (Oct. 28, 1988) (Doc. No. DEK000405). The memo section of the check noted "Reimb. for taxes" reflecting a reimbursement to Ozarks Realty by Mrs. Clinton for county taxes. This contribution was included in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

¹⁶ See Check No. 2726 from the account of Bill and Hillary Rodham Clinton signed by HR Clinton payable to Ozarks Realty for \$291.35 (Oct. 9, 1989) (Doc. No. DEK000413). It reflected a reimbursement for county taxes. This contribution was included in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

¹⁷ See Check No. 028402 from the account of the Rose Law Firm signed by Carolyn Huber payable to Secretary of State for \$345.15 noting, "Franchise Tax, Hillary R. Clinton-

Personal Account." (June 21, 1990) (Doc. No. DEK006631). This contribution was included in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

¹⁸ See Statement from Redden & Company to Hillary Clinton re: Whitewater Development Company, Inc. income tax returns showing \$2,839.24 balance due (June 1, 1990) (Doc. No. LP 02409); Check No. 3202 from the account of Bill Clinton or Hillary Rodham Clinton signed by HR Clinton payable to Redden & Company for \$2839.24 (June 12, 1990) (Doc. No. A0008204), reflecting payment to Redden & Company for preparation of Whitewater Development Corporate Federal and State Income Tax Returns for fiscal years 1987, 1988, and 1989. This contribution was included in the Lyons Report. See Lyons Report Clinton Transaction Summary at 1-2 (as of May 31, 1991) (Doc. Nos. DEK000082 through 83).

¹⁹ Great Southern made this payment on Whitewater Development's Loan No. 5885 at Citizens Bank. This payment was not reimbursed by the Clintons. Note Due Notice from Citizens Bank & Trust Co. to James B. McDougal or Bill Clinton showing a payment of \$225.13 (due date Feb. 5, 1979) (Doc. No. DEK003312); Workpaper prepared by Whitewater Development accountant showing Great Southern payment of \$225.13 (Doc. No. DEK000571). Great Southern also made a payment of \$4,377.68 on Loan No. 5885 at Citizens Bank, and was reimbursed by the Clintons for the entire amount via their Check No. 697, dated December 28, 1978, in the amount of \$10,130.58. See Check No. 697 from the account of Bill Clinton or Hillary Rodham payable to Great Southern Land Company Inc. for \$10,130.58 (Dec. 28, 1978) (Doc. No. DEK001152).

²⁰ Payment on Whitewater Development acquisition loan at Citizens Bank by Great Southern. See Note Due Notice from Citizens Bank & Trust Co. to James B. McDougal showing payment of \$4,452.70 noting, "5/5/79, #323" (due date May 5, 1979) (Doc. No. DEK003312) (the Independent Counsel did not locate this check during the course of his investigation); Workpaper prepared by Whitewater Development accountant Charles E. James, listing amount as a payment by Great Southern. This payment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

²¹ Great Southern made this payment on Whitewater Development Acquisition Loan No. 4197 at Union National; Bank Ledger Sheet showing same payment of \$999.99 (June 28, 1979) (Doc. No. GS-00014384); Workpaper prepared by Whitewater Development accountant Charles E. James, listing item as amount paid by Great Southern. This payment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

²² Payment on Whitewater Development Acquisition Loan No. 5885 at Citizens Bank was made by Ms. McDougal who was then reimbursed by Great Southern. Check No. 215 from the account of James B. or Susan H. McDougal signed by Susan H. McDougal payable to Citizens Bank and Trust Co. for \$4,577.78 noting, "Interest Note no. 5885." (Aug. 9, 1979) (Doc. No. 66-00009703). The McDougal's checkbook register for Check No. 215 noting, "Interest GSLC." (Doc. No. 66-00009098); Union National Bank Deposit Ticket for the account of James

B. and Susan H. McDougal for \$4,577.78 noting, "Reimb int. GSLC \$4,577.78" (Aug. 17, 1979) (Doc. No. 66-00007683). This payment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

²³ Great Southern payment on Whitewater Development Acquisition Loan No. 4197 at Union National. Union National ledger sheet showing payment of interest for \$517.81 (Sept. 18, 1979) (Doc. No. GS-00014384); Workpaper prepared by Whitewater Development accountant Charles E. James, showing same amount paid by Great Southern. This payment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

²⁴ Repayment of loan by Whitewater Development to Great Southern. See Check No. 102 from the account of Whitewater Development Company, Inc. signed by Charles E. James payable to Great Southern Land Company, Inc. for \$1,100.00 (Dec. 11, 1979) (Doc. No. DEK501284). The repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

²⁵ Interest payment on Whitewater Development Acquisition Loan No. 4197 at Union National. See Check No. 1516 from the account of James B. and Susan H. McDougal signed by James B. McDougal payable to Union National Bank for \$573.42 noting, "Interest Note no. 0004197" (Dec. 20, 1979) (Doc. No. 66-00000923); see also McDougal's checkbook register for Check No. 1516 (Dec. 20, 1979) (Doc. No. 66-00009149).

²⁶ Loan to Whitewater Development from Flowerwood Farms, Inc. See Union National Bank Deposit Ticket for Whitewater Development Company for \$1,000 noting, "Flowerwood Farms, Inc. (Loan)" (Feb. 21, 1980) (Doc. No. DEK501315); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

²⁷ Loan made to Whitewater Development by Jim McDougal. See Union National Bank Deposit Ticket for the account of Whitewater Development Company for \$4,000 noting, "James B. McDougal (Loan)" (May 5, 1980) (Doc. No. DEK501253). This contribution was reported in Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

²⁸ Expenses paid by Great Southern for Whitewater Development. These expenses were entered on the Whitewater Development books via Whitewater Development accountants year-end Adjusting Entry No. 2. Expenses entered via this adjusting entry totaled \$26,392.69. The difference between the \$26,392.69 and the \$25,874.88 is interest of \$517.81. See Workpapers prepared by Whitewater Development accountant Charles E. James, for items paid by Great Southern for Whitewater Development (Doc. Nos. DEK000571, 2819, 4030, 4037, 4038, 4039, 4042, 4050, 4052). This payment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

²⁹ Repayment of loan by Whitewater Development to Flowerwood Farms. See Check No. 113 from the account of Whitewater Development Company, Inc. signed by Charles E.

James payable to Flowerwood Farms for \$1,000.00 (June 11, 1980) (Doc. No. DEK501369). The check was drawn on Union National and noting, "Repay Loan"; see also Whitewater Development checkbook register entry for Check No. 113 (June 11, 1990) (Doc. No. DEK002826); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

³⁰ Loan to Whitewater Development from Great Southern. See Union National Bank Deposit Ticket Whitewater Development for \$700.00 noting, "GSLC, Inc. (Loan) " (June 23, 1980) (Doc. No. DEK501353). This payment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

³¹ Loan made to Whitewater Development by Jim McDougal. See Check No. 2344 from the account of James B. and Susan H. McDougal signed by James B. McDougal payable to Whitewater Development Corp. for \$1,200.00 (July 14, 1980) (Doc. No. 66-00011018); see also McDougal checkbook register entry for Check No. 2344 (July 14, 1980) (Doc. No. 66-00002558). This contribution was reported in Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

³² Loan to Whitewater Development from Great Southern. See Union National Bank Deposit Ticket for Whitewater Development Co., Inc. for \$400.00 noting, "GSLC, Inc." (July 15, 1980) (Doc. No. DEK501380). This payment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

³³ Interest payment on Whitewater Development acquisition loan at Citizens Bank. The payment was originally made by James B. and Susan H. McDougal in the amount of \$4,593.13. The Lyons Report, Note G, explains that the Clintons made an interest payment of \$4,350.00 on August 5, 1980. Lyons Report Clinton Transaction Summary at 1 (as of May 31, 1991) (Doc. No. DEK000082). This payment was not applied directly to Citizens Bank Loan No. 5885. The payment was apparently given to Jim McDougal personally in the same manner as the \$9,000.00 Clinton payment on August 23, 1980. Thus the McDougal payment of \$4,593.13 would be reduced by the \$4,350.00 reimbursement for a net loan by Jim McDougal of \$243.13. See Check No. 2373 from the account of James B. and Susan H. McDougal payable to Citizens Banks of Flippin for \$4,593.13 (Aug. 20, 1980).

³⁴ Payment made directly to Miguon Frances by Jim McDougal with Smith-Tucker-McDougal funds for deposit on Whitewater Development modular home. See Check No. 140 from the account of Smith-Tucker-McDougal signed by James B. McDougal payable to Miguon Frances for \$2,000.00 noting, "Deposit on modular home to be delivered within 30 days." (Aug. 18, 1980) (Doc. No. 66-00000424); see also Smith-Tucker-McDougal checkbook register entry for Check No. 140 noting, "Loan to WW" (Aug. 18, 1980) (Doc. No. 66-00000427).

³⁵ Payment made directly to Jerod Nichols by Jim McDougal with Smith-Tucker-McDougal funds for Whitewater Development road work. See Check No. 145 from the account of Smith-Tucker-McDougal signed by James B. McDougal payable to Jeral Nichols for \$910.00 (Aug. 25, 1980) (Doc. No. 66-00000453); see also Smith-Tucker-McDougal checkbook register

entry for Check No. 145 noting, "Loan to WW Roadwork" (Aug. 25, 1980) (Doc. No. 66-00000248).

³⁶ Payment made directly to Ozark Realty Co. by Jim McDougal with Smith-Tucker-McDougal funds for Whitewater Development road work. See Check No. 146 from the account of Smith-Tucker-McDougal signed by James B. McDougal payable to Ozark Realty Co. for \$266.53 (Aug. 25, 1980) (Doc. No. 66-00000432); see also Smith-Tucker-McDougal checkbook register entry for Check No. 146 noted "Loan to WW Roadwork" (Aug. 25, 1980) (Doc. No. 66-00000250).

³⁷ Loan to Whitewater Development from Great Southern. See Union National Bank Deposit Ticket for Whitewater Development Co., Inc. for \$4,000.00 noting, "GSLC, Inc. (Loan)" (Sept. 1, 1980) (Doc. No. DEK501394); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

³⁸ Repayment of loan by Whitewater Development to McDougal. See Check No. 116 from the account of Whitewater Development Co., Inc. signed by Charles E. James payable to James B. McDougal for \$5,000.00 noting, "Repay Loan." (Sept. 1, 1980) (Doc. No. DEK501398). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

³⁹ Loan to Whitewater Development from Pembroke Manor. See Pembroke Manor checkbook register entry for Check No. 1101 noting "Whitewater Development Corp. Loan \$32,000.00" (Sept. 27, 1980) (Doc. No. 66-00000635); see also Union National Bank Deposit Ticket for Whitewater Development Co., Inc. for \$32,000.00 noting, "Loan Pembroke" (Sept. 27, 1980) (Doc. No. DEK501390); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

⁴⁰ Repayment by Whitewater Development to Smith-Tucker-McDougal for three payments made by Smith-Tucker-McDougal on behalf of Whitewater Development. See Whitewater Development checkbook register entry for Check No. 125 noting, "Smith-Tucker-McDougal Repay for Bills Paid \$3,176.53" (Oct. 8, 1980) (Doc. No. DEK003355); Whitewater Development ledger reflecting Check No. 125 (Oct. 8, 1980) (Doc. No. DEK00591).

⁴¹ Loan to Whitewater Development from McDougal & Associates. See Union National Bank Deposit Ticket for Whitewater Development Co., Inc. for \$4,000 noting, "Loan-McD & Assoc." (Oct. 17, 1980) (Doc. No. DEK 501304).

⁴² Loan from Jim McDougal to Whitewater Development. See Check No. 17 from the account of James B. McDougal payable to Whitewater Development for \$3,800.00 (Nov. 15, 1980) (Doc. No. 66-00011020); see also Bank of Kingston Deposit Ticket for the account of Whitewater Development Co., Inc. for \$3,800 noting, "James B. McDougal" (Nov. 15, 1980) (Doc. No. DEK500639). This contribution was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

⁴³ Loan from Jim McDougal to Whitewater Development. See Whitewater Development ledger noting receipt of \$2,000.00 posted "Loan-JBM" (Doc. No. LP 00410); Unnumbered Check from the account of Tucker-Smith-McDougal signed by Tucker-Smith McDougal payable to Whitewater for \$2,000.00 (Dec. 16, 1980) (Doc. No. 66-00000802); see also Bank of Kingston Deposit Ticket for Whitewater Dev. Co. for \$2,000 (Dec. 16, 1980) (Doc. No. DEK500567). This contribution was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

⁴⁴ Repayment of loan by Whitewater Development to Pembroke Manor. See Check No. 102 from the account of Whitewater Development Cor., Inc. signed by Susan H. McDougal payable to Pembroke Manor, Inc. for \$28,000.00 noting, "Loan Payment" (Dec. 31, 1980) (Doc. No. DEK 500651); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁴⁵ Loan to Whitewater Development from Great Southern. See Check No. 104 from the account of Great Southern Land Co. Inc. signed by Blenda Howard payable to Whitewater Development Co. for \$1,200.00 noting, "Loan." (Feb. 12, 1981); see also Bank of Kingston Deposit Ticket for Whitewater Development for \$1,200 noting, "GSLC Loan \$1,200.00" (Feb. 12, 1981) (Doc. No. DEK002151); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁴⁶ Loan to Whitewater Development from Great Southern. See Check No. 106 from the account of Great Southern Land Co. Inc. signed by Blenda Howard payable to Whitewater Development for \$500 noting, "loan." (Feb. 13, 1981) (Doc. No. 66-00007499); Bank of Kingston Deposit Ticket for Whitewater Development Co. Inc. for \$500 noting, "GSLC Loan" (Feb. 13, 1981) (Doc. No. DEK002152); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁴⁷ A check for \$170.02 noting "Nunes" was deposited into the Whitewater Development account on May 6, 1981. The payment was income of Great Southern and not income of Whitewater Development. Whitewater Development did not sell a lot to a "Nunes." See Bank of Kingston Deposit Ticket for Whitewater Development for \$170.02 noting, "Nunes" (May 6, 1981) (Doc. No. DEK501143). This payment was included in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁴⁸ Repayment of loan by Whitewater Development to Pembroke Manor. See Check No. 119 from the account of Whitewater Development signed by Blenda Howard payable to Pembroke Manor for \$7,000 (Sept. 14, 1981) (Doc. No. DEK500582); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁴⁹ Repayment of loan to Whitewater Development by Jim McDougal. See Check No. 120 from the account of Whitewater Development signed by James B. McDougal payable to James B. McDougal for \$10,000 noting, "Repay Loan" (Sept. 15, 1981) (Doc. No. DEK500580); Whitewater Development checkbook register (Doc. No. DEK003053). This repayment was

reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵⁰ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 124 from the account of Whitewater Development signed by Blenda Howard payable to James B. McDougal for \$100 noting, "loan" (Nov. 5, 1981) (Doc. No. DEK 500599); Whitewater Development checkbook register entry for Check No. 124 noting, "loan"(Doc. No. DEK 500494). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵¹ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 127 from the account of Whitewater Development signed by S.H. McDougal payable to James B. McDougal for \$1,000 (Dec. 2, 1981) (Doc. No. DEK 500592); Whitewater Development checkbook register (Doc. No. DEK 500501). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵² Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 128 from the account of Whitewater Development signed by Susan H. McDougal. payable to James B. McDougal for \$500.00 noting, "5-309-0" (Dec. 10, 1981) (Doc. No. DEK 500590); Whitewater Development checkbook register entry for Check No. 127 (Doc. No. DEK 500502). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵³ Payment made directly to G.W. Burris, Burris Construction, by Jim McDougal with Tucker-Smith-McDougal funds for work on house on Whitewater Development Lot 13. See Tucker-Smith-McDougal ledger sheet listing payment to G.W. Burris for \$675.00 with the notation, "Loan - WW, McD draw - loan to Whitewater."

⁵⁴ Loan to Whitewater Development from Great Southern. See Bank of Kingston Deposit Ticket for Whitewater Development for \$1,450 noting, "GSLC Loan" (Jan. 8, 1982) (Doc. No. DEK 500712); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵⁵ Repayment of loan by Whitewater Development to Jim McDougal. See Whitewater Development checkbook register entry for Check No. 132 noting, "2/18/82, Counter Check to JBMc written by Susan, \$1,000.00"(Feb. 18, 1982) (Doc. No. DEK 500503); Whitewater Development bank statement reflecting two withdrawals totaling \$6,691.20 and one numbered check in the amount of \$5,691.20 (Feb. 18, 1982) (Doc. No. DEK 500065). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵⁶ Loan to Whitewater Development from Rolling Manor. See Bank of Kingston Deposit Ticket for Whitewater Development for \$766.85 noting, "Rolling Manor, loan" (Feb. 22, 1982) (Doc. No. DEK500768); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵⁷ Loan to Whitewater Development from Great Southern. See Check No. 122 from the account of Great Southern Land Co. Inc. signed by Blenda Howard payable to Whitewater Development for \$334.77 noting, "loan" (Mar. 24, 1982) (Doc. No. 66-00007495); see also Bank of Kingston Deposit Ticket for Whitewater Development for \$334.77 noting, "Loan GSLC" (Mar. 24, 1982) (Doc. No. DEK 500820); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵⁸ Loan to Whitewater Development from Great Southern. See Check No. 125 from the account of Great Southern Land Co. Inc. signed by Blenda Howard payable to Whitewater Dev. Corp. for \$488.00 (June 1, 1982) (Doc. No. 66-00007493); see also Bank of Kingston Deposit Ticket for Whitewater Development for \$488.00 noting, "transfer from GSLC" (June 1, 1982) (Doc. No. DEK002154); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁵⁹ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 141 from the account of Whitewater Development signed by James B. McDougal payable to Jim McDougal for \$741.62 (June 9, 1982) (Doc. No. DEK 500050); Whitewater Development checkbook register entry for Check No. 141 (Doc. No. DEK500471). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

⁶⁰ McDougal payment on Whitewater Development loan at the Bank of Cherry Valley. See Check No. 121 from the account of James B. McDougal Trustee signed by Blenda Howard payable to Bank of Cherry Valley for \$258.14 (July 7, 1982).

⁶¹ McDougal payment on Whitewater Development loan at the Bank of Cherry Valley. See Check No. 123 from the account of James B. McDougal Trustee signed by Blenda Howard payable Bank of Cherry Valley for \$258.14 noting, "for June payment..." (Aug. 9, 1982).

⁶² McDougal payment on Whitewater Development loan at the Bank of Cherry Valley. See Bank of Cherry Valley general ledger credit slip in the amount of \$258.14; Bank of Cherry Valley note showing payment of \$258.14 on July 12, 1982, August 9, 1982, and August 11, 1982 (Doc. No. DEK006491).

⁶³ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 147 from the account of Whitewater Development signed by Blenda Howard payable to Madison Bank and Trust for \$1,560 noting, "JBM OD" (Aug. 25, 1982) (Doc. No. DEK 500005); Whitewater Development checkbook register noting, "8/25/82, Check No. 147, To: MB&T, For: JBM OD checks (American Express)" (Doc. No. DEK500473). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁶⁴ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 148 from the account of Whitewater Development signed by Blenda Howard and made payable to James B. McDougal (Sept. 17, 1982) (Doc. No. DEK500664); Whitewater Development

checkbook register noting, "9/17/82, check number 148, To: JBM, For: ODJc" (Doc. No. DEK 500473). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁶⁵ Repayment of loan to Whitewater Development to Great Southern. See Whitewater Development checkbook register Check No. 149 noting, "To: GSLC" (Oct. 7, 1982) (Doc. No. DEK 500474); Whitewater Development bank statement for period ending Oct. 29, 1982, for checking account at Bank of Kingston listing Check No. 149 in the amount of \$120.00 clearing the bank on Oct. 7, 1982 (Doc. No. 66-00000194); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁶⁶ Repayment of loan by Whitewater Development to Jim McDougal. See Whitewater Development checkbook register entry for Check No. 151 for \$2,800 noting, "10/13/82, check number 151, To: JBM, For: repay loan" (Oct. 10, 1982) (Doc. No. DEK 500474). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁶⁷ Repayment of loan by Whitewater Development to Jim McDougal. See Whitewater Development checkbook register for Check No. 152 for \$262 noting, "To: JBM, For: OD" (Oct. 19, 1982) (Doc. No. DEK 500475). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁶⁸ Repayment of loan by Whitewater Development to Jim McDougal. See Whitewater Development checkbook register, for Check No. 153 for \$335.665 noting, "10/21/82, check number 153, To: JBM, For: OD" (Oct. 21, 1982) (Doc. No. DEK500475). See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁶⁹ Repayment of loan by Whitewater Development to Jim McDougal. See Whitewater Development checkbook register, for Check No. 154 for \$355 noting, "10/28/82, check number 154, JBM, OD" (Oct. 28, 1982) (Doc. No. DEK 500475). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁷⁰ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 155 from the account of Whitewater Development signed by Blenda Howard payable to Tax Collector for \$264.19 noting, "JB McDougal property tax"(Oct. 29, 1982) (Doc. No. DEK501439). Whitewater Development checkbook register entry for Check No. 155 noting, "to tax collector, For JBM"(Doc. No. DEK500476). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁷¹ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 156 for the account of Whitewater Development signed by Blenda Howard and made payable to James B. McDougal for \$1,164.31 (Nov. 4, 1982) (Doc. No. DEK501443). This repayment was

reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁷² Repayment of Whitewater Development loan to Madison Bank. See Whitewater Development Adjusting Journal Entry No. 14 for May 31, 1985, which records payment of note at Madison Bank by "JBM personally." The difference between the amount recorded in the journal entry, \$25,855.02, and the actual principal paid, \$25,555.02, was apparently due to bookkeeping errors. The payoff of the loan by Jim McDougal was made in 1982, but was not recorded on the Whitewater books until 1985 (Doc. No. LP 00454); see also credit slip dated Nov. 18, 1982 noting "IEWC on Loan, 23337-01 WW", in the amount of \$2,044.98, credit slip dated 11/18/82 noting "L&D,23337-01 W.W." in the amount of \$25,555.02. ($\$2,044.98 + \$25,555.02 = \$27,600.00$) (Doc. No. 66-00007589).

⁷³ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 158 from the account of Whitewater Development signed by Blenda Howard payable to James B. McDougal for \$491.21 (Nov. 29, 1982) (Doc. No. DEK 501445). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁷⁴ Loan to Whitewater Development from Flowerwood Farms. See Madison Bank Deposit Ticket for Whitewater Development for \$1,500 noting, "FF loan \$1,500.00" (Dec. 27, 1982) (Doc. No. DEK 501461); Whitewater Development checkbook register entry, dated December 21, 1982 noting, "money borrowed from FF \$1,500.00" (Doc. No. DEK 500477); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁷⁵ Loan to Whitewater Development from Jim McDougal from Account No. 0001-044-7, James B. McDougal, Trustee, Bank of Kingston. See Madison Bank Deposit Ticket for Whitewater Development for \$400 noting, "Trustee loan" (Dec. 27, 1982) (Doc. No. DEK 500477); Checkbook Register entry showing deposit for \$400.00 (Doc. No. DEK 500477). This contribution was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁷⁶ A check noting "Martin" in the amount of \$99.00 was deposited into the Whitewater Development account at Citizens Bank. This check was income of Great Southern; Whitewater Development did not sell a lot to anyone named "Martin." See Citizens Bank and Trust Deposit Ticket for Whitewater Development for \$99.00 noting, "Martin" (Feb. 14, 1983) (Doc. No. DEK010383).

⁷⁷ Loan to Whitewater Development from Great Southern. See Madison Guaranty Deposit Ticket for Whitewater Development for \$300.00 noting, "GSLC Loan" (Mar. 27, 1983) (Doc. No. DEK 501430); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁷⁸ Repayment of loan by Whitewater Development by Jim McDougal. See Check No. 108, from the account of Whitewater Development signed by James B. McDougal payable to

James B. McDougal for \$5,000 (Aug. 6, 1983) (Doc. No. DEK501583). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁷⁹ Loan to Whitewater Development by Jim McDougal. See Madison Guaranty Deposit Ticket for Whitewater Development for \$18,584.28 noting, "# 279 \$17,000.00, # 000108 \$1584.28" (Doc. No. DEK 501563); journal entry showing loan of \$18,584.28 by JBM on Oct. 19, 1983. (Doc. No. LP 00419). This loan was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁸⁰ Repayment of loan by Whitewater Development to Jim McDougal. See Check No. 114 from the account of Whitewater Development signed by S. McDougal payable to James B. McDougal for \$600.00 (Feb. 14, 1984) (Doc. No. 501578). This repayment was reported in the Lyons Report. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁸¹ Repayment of loan to Whitewater Development by Jim McDougal. See Warranty Deed conveying property to Wade by Whitewater Development, filed Apr. 24, 1984; see also ledger page provided by Wade which reflects Apr. 13, 1984, loan in the amount of \$7,000.00 he obtained at First Bank & Trust, Mountain Home, Arkansas to purchase forty acres noting, "McDougal" (Doc. No. 355-00053794); Chris Wade 5/15/95 FBI Int. at 5 (stating Wade purchased forty acres from Whitewater Development or McDougal personally and paid \$6,000.00 to \$8,000.00). This \$7,000.00 was not deposited into the account of Whitewater Development.

⁸² Repayment of loan by Whitewater Development to Tucker-Smith-McDougal. See Check No. 117 from the account of Whitewater Development signed by S. McDougal payable to Tucker-Smith-McDougal for \$750.00 (Aug. 28, 1984) (Doc. No. DEK 501479); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

⁸³ Loan to Whitewater Development by Jim McDougal. See Check No. 113 from the account of James B. McDougal, Trustee signed by S. McDougal payable to Whitewater Development for \$200.00 noting, "Loan" (Oct. 25, 1984); Madison Guaranty Deposit Ticket for Whitewater Development for \$200.00 (Oct. 26, 1984) (Doc. No. DEK 501501). This loan was reported in the Lyons Report. See Lyons Report (Doc. No. DEK000084).

⁸⁴ Loan to Whitewater Development from Great Southern. See Check No. 121 from the account of Great Southern signed by Susan McDougal payable to Whitewater Development for \$650.00 noting "Loan" (Oct. 25, 1984) (Doc. No. 54-17958-00000130); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$650.00 noting, "Loan GS Land Co. \$650.00" (Oct. 26, 1984) (Doc. No. DEK501501); Lyons Report (Doc. No. DEK001155).

⁸⁵ Loan to Whitewater Development from Pembroke Manor. See Check No. 118 from the account of Pembroke Manor, Inc signed by S. McDougal payable to Whitewater Development for \$1,700.00 noting, "Loan" (Oct. 25, 1984) (Doc. No. 54-17958-0000132); see

also Madison Guaranty Deposit Ticket for Whitewater Development for \$1,700.00 noting, "Pembrook \$1,700.00" (Oct. 26, 1984) (Doc. No. DEK501501).

⁸⁶ Loan to Whitewater Development from Tucker-Smith-McDougal. See Check No. 152 from the account Tucker-Smith-McDougal signed by S. McDougal payable to Whitewater Development for \$7,500.00 noting, "Loan" (Dec. 26, 1984) (Doc. No. GS-0007546); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$7,500.00 noting, "TSM \$7,500.00" (Sept. 10, 1984) (Doc. No. GS-00007545).

⁸⁷ Loan to Whitewater Development from Smith-McDougal. See Canceled Check No. 204 from the account of Smith-McDougal signed by James B. McDougal payable to Whitewater Development Corp. for \$500.00 noting, "Loan" (Oct. 26, 1984); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$500.00 noting, "Smith McD. Kingston \$500.00" (Oct. 26, 1984) (Doc. No. DEK501519). The Lyons Report included this payment, but mischaracterized its source as being Susan McDougal. See Lyons Report (Doc. No. DEK001155).

⁸⁸ Loan to Whitewater Development from Flowerwood Farms. See Check No. 166 from the account of Flowerwood Farms signed by S. McDougal payable to Whitewater Development for \$12,000.00 noting "Loan"(Nov. 6, 1984) (Doc. No. 54-1769-000); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$12,000.00 noting, "Loan Flowerwood Farms \$12,000.00" (Nov. 6, 1984) (Doc. No. DEK 501519); Lyons Report (Doc. No. DEK001155).

⁸⁹ Loan to Whitewater Development from Madison Marketing. See Check No. 103 from the account Madison Marketing signed by S. McDougal payable to Whitewater Development for \$5,566.39 noting, "Loan" (Nov. 19, 1984) (Doc. No. GS-0007591); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$5,566.39 noting, "no. 103 Madison Marketing \$5,566.39" (Nov. 19, 1984) (Doc. No. DEK501520); Lyons Report (Doc. No. DEK000084).

⁹⁰ Loan to Whitewater Development by Jim McDougal. See Check No. 114 from the account of James B. McDougal, Trustee signed by James B. McDougal payable to Whitewater Development for \$280.00 noting, "Loan" (Dec. 6, 1984) (Doc. No. GS-00007605); Madison Guaranty Deposit Ticket for Whitewater Development for \$280.00 (Dec. 7, 1984) (Doc. No. GS-00007603). This loan was reported in the Lyons Report. See Lyons Report (Doc. No. DEK000084).

⁹¹ Loan to Whitewater Development from Tucker-Smith-McDougal. See Check No. 159 from the account of Tucker-Smith-McDougal signed by James B. McDougal payable to Whitewater Development for \$1,600.00 noting, "Loan" (Dec. 6, 1984) (Doc. No. GS-00007605); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$1,600.00 noting, "TSM \$1,600.00" (Dec. 7, 1984) (Doc. No. GS-00007603); Lyons Report (Doc. No. DEK001155).

⁹² Loan to Whitewater Development from Rolling Manor. See Check No. 198 from the account of Rolling Manor signed by James B. McDougal payable to Whitewater Development for \$330.00. The notation is illegible (Dec. 6, 1984) (Doc. No. GS-00007605); see also Madison Guaranty Deposit Ticket for Whitewater Development noting, "Rolling Manor, \$330.00" (Dec. 7, 1984) (Doc. No. GS-00007603); Lyons Report (Doc. No. DEK001155).

⁹³ Loan to Whitewater Development from Pembroke Manor. See Check No.120 from the account of Pembroke Manor, Inc signed by James B. McDougal payable to Whitewater Development for \$7,100.00 noting, "Loan" (Dec. 6, 1984) (Doc. No. GS-00007607); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$7,100.00 noting, "Pembroke \$7,100.00" (Dec. 7, 1984) (Doc. No. GS-00007603); Lyons Report (Doc. No. DEK001155).

⁹⁴ Loan to Whitewater Development from Smith-McDougal. See Check No. 207 from the account of Smith-McDougal signed by James B. McDougal payable to White Water Development Corp for \$400.00 noting, "Loan"; see also Madison Guaranty Deposit Ticket for Whitewater Development for \$400.00 noting, "no. 207 S-McD Kingston \$400.00" (Jan. 10, 1985) (Doc. No. DEK 501625). The Lyons Report included this payment, but mischaracterized its source as James B. McDougal (Doc. No. DEK000084).

⁹⁵ Loan to Whitewater Development from Flowerwood Farms. See Check No. 172 from the account of Flowerwood Farms signed by James B. McDougal payable to Whitewater Development for \$1,430.00 noting, "Loan" (Jan. 9, 1985); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$1,430.00 noting, "no. 172 FF \$1,430.00" (Jan. 10, 1985) (Doc. No. DEK 501625); Lyons Report (Doc. No. DEK001155).

⁹⁶ Loan to Whitewater Development from Pembroke Manor. See Check No. 121 from the account of Pembroke Manor, Inc. signed by James B. McDougal payable to Whitewater Development Corp. Inc. for \$730.00 noting, "Loan"; see also Whitewater Development Deposit Ticket for Madison Guaranty for \$730.00 noting, "# 121 Pembroke \$730.00" (Jan. 10, 1985) (Doc. No. DEK501625); Lyons Report (Doc. No. DEK001155).

⁹⁷ Loan to Whitewater Development from Rolling Manor. See Check No. 199 from the account of Rolling Manor signed by James B. McDougal payable to Whitewater Development for \$1,500.00 noting, "Loan" (Jan. 9, 1985); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$1,500.00 noting, "# 199 R.M. \$1500.00" (Doc. No. DEK501625); Lyons Report (Doc. No. DEK001155).

⁹⁸ Loan to Whitewater Development from Tucker-Smith-McDougal. See Check No. 160 from the account of Tucker-Smith-McDougal signed by James B. McDougal payable to Whitewater Development for \$600.00 noting, "loan" (Jan. 1, 1985); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$600.00 noting, "#160 TSM \$600.00" (Jan. 10, 1985) (Doc. No. DEK 501625); Lyons Report (Doc. No. DEK001155).

⁹⁹ Loan to Whitewater Development from Flowerwood Farms. See Check No. 177 from the account of Flowerwood Farms signed by S. McDougal payable to Whitewater Development for \$1,000.00. The notation is illegible (Jan. 28, 1985); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$1,000.00 noting, "Flowerwood Farms loan \$1,000.00" (Jan. 28, 1985) (Doc. No. DEK 501629); Lyons Report (Doc. No. DEK001155).

¹⁰⁰ Loan to Whitewater Development from Rolling Manor. See Check No. 205 from the account of Rolling Manor signed by S. McDougal payable to Whitewater Development for \$1,900.00 (Mar. 12, 1985); see also Madison Guaranty deposit ticket for Whitewater Development for \$1,900.00 noting, "Rolling M Ck # 205, \$1900.00" (Mar. 12, 1985) (Doc. No. DEK 501654); Lyons Report (Doc. No. DEK001155).

¹⁰¹ Loan to Whitewater Development from Pembroke Manor. See Check No. 123 from the account of Pembroke Manor, Inc. signed by S. McDougal payable to Whitewater Development for \$900.00 (Mar. 12, 1985); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$900.00 noting, "Loan Pembroke Ck # 123 \$900.00" (Mar. 12, 1985) (Doc. No. DEK501652); Lyons Report (Doc. No. DEK001155).

¹⁰² Loan to Whitewater Development from Tucker-Smith-McDougal. See Check No. 165 from the account of Tucker-Smith-McDougal signed by S. McDougal payable to Whitewater Development Corp. for \$2,500.00 (Mar. 12, 1985); see also Madison Guaranty deposit ticket for Whitewater Development for \$2,500.00 noting, "T.S.McD Ck # 165 Loan no. 2,500.00" (Mar. 12, 1985) (Doc. No. DEK 501653); Lyons Report (Doc. No. DEK001155) (which reported a loan in the amount of \$3,000.00).

¹⁰³ Loan to Whitewater Development from Smith-Tucker-McDougal. See Check No. 214 from the account of Smith-Tucker-McDougal signed by James B. McDougal payable to Whitewater Development for \$500.00 noting, "Loan" (Mar. 12, 1985).

¹⁰⁴ Repayment of apparent nominee loan secured by Wade for McDougal. Based on statements made by Wade, owner of Ozarks Realty Company, and relevant documents, it appeared that McDougal used \$25,000.00 in Whitewater funds to repay Wade for a \$25,000.00 nominee loan Wade obtained for McDougal from Madison Guaranty on June 16, 1983. See Wade 6/20/95 Int. at 2-3; loan ledger sheet provided by Wade (showing receipt of a \$25,000.00 loan on June 16, 1983 from Madison Guaranty with the notation "Jim" that also shows that the loan was repaid on Mar. 22, 1985); Promissory Note dated June 16, 1983 for \$25,000.00 loan from Madison Guaranty Savings to Chris V. and Rosalee Wade (Doc. No. 56-00117646); Check No. 137 from the account of Whitewater Development signed by James B. McDougal payable to Ozarks Realty Company for \$25,000.00 (Doc. No. DEK002099); Check No. 991 from the account of Chris V. Wade & Associates Ozarks Realty Inc. signed by Rosalee Wade payable to Ozarks Realty Company in the amount of \$25,000.00 (Mar. 22, 1985) (Doc. No. 335-00046152).

¹⁰⁵ Loan to Whitewater Development from Flowerwood Farms. See Check No. 194 from the account of Flowerwood Farms signed by James B. McDougal payable to Whitewater Development for \$24,455.90 noting, "Loan" (Apr. 9, 1985) (GS-00007668); see also Madison

Guaranty Deposit Ticket for Whitewater Development for \$24,455.90 noting, "00194 James B. McDougal \$24,455.90" (Apr. 9, 1985) (Doc. No. DEK002107); Lyons Report (Doc. No. DEK001155).

¹⁰⁶ Repayment of loan by Whitewater Development to Jim McDougal. See Check No.138 from the account of Whitewater Development Corp. signed by S. McDougal payable to James B. McDougal for \$30,000.00 noting, "Loan Repayment" (Doc. No DEK002099). This repayment was reported in the Lyons Report; see also Lyons Report (Doc. No. DEK001155).

¹⁰⁷ Loan to Whitewater Development by Jim McDougal made through the direct payment of McDougal's 1985 bonus from Madison Guaranty to Whitewater Development. See Check No.1940 from the account of Madison Financial signed by Greg Young payable to Whitewater Development for \$30,000.00 (Apr. 30, 1985) (Doc. No. GS-00007678). This loan was reported in the Lyons Report; see also Lyons Report (Doc. No. DEK001155).

¹⁰⁸ Repayment of loan by Whitewater Development to McDougal. This repayment reflected Ozark Air's purchase of twenty four lots from Whitewater Development in May 1985 for \$60,000.00. This was paid by Ozark Air assuming \$35,000.00 of the Whitewater acquisition loan at Citizens Bank and by delivery of a Piper Seminole airplane valued at \$25,000.00. The airplane was transferred to McDougal, personally and entered on Whitewater Development books as a distribution to McDougal. See Whitewater Development Adjusting Journal Entry No. 3 (May 31, 1986) (Doc. No. DEK000609); Offer and Acceptance (May 17, 1985) (Doc. No. 62-00000003) (setting forth particulars of Ozark Air Services, Inc.'s purchase of Whitewater Development lots); Ozark Realty Co. letter to Whitewater Development (May 4, 1985) (Doc. No. DEK006158). This repayment was reported in the Lyons Report; see also Lyons Report (Doc. No. DEK001155).

¹⁰⁹ Loan to Whitewater Development by McDougal. See Whitewater Development ledger page recording a deposit to Citizens Bank noting "JBM"; mail deposit receipt at Citizens Bank in the amount of \$1,500.00 (July 3, 1985) (Doc. No. DEK003964). This loan was reported in the Lyons Report; see also Lyons Report (Doc. No. DEK001155).

¹¹⁰ Check No. 142 from the account of Whitewater Development signed by James B. McDougal payable to James B. McDougal for \$300.00 noting, "loan" (Sept. 24, 1985) (Doc. No. 54-17894-00000178).

¹¹¹ Repayment of loan by Whitewater Development to Flowerwood Farms. See Check No. 143 from the account of Whitewater Development signed by James B. McDougal payable to Flowerwood Farms Inc. for \$100.00 noting, "Loan" (Oct. 10, 1985); see also Lyons Report (Doc. No. DEK001155).

¹¹² Loan to Whitewater Development from the account of Madison Marketing. See Madison Marketing check (unnumbered) signed by Susan McDougal payable to Whitewater Development for \$7,500.00 noting, "professional fee" (Nov. 8, 1985); see also Madison Guaranty Deposit Ticket for Whitewater Development for \$7,500.00 noting, "Madison

Marketing \$7,500.00" (Nov. 8, 1985) (Doc. No. GS-00014523). The Lyons Report erroneously identified James B. McDougal as being the source of \$7,000.00 of these funds on May 31, 1986. See Lyons Report (Doc. No. DEK000084). The OIC determined that the \$7,000.00 represented a portion of a \$7,500.00 loan from Madison Marketing to Whitewater Development. Repayments of \$300.00 (Sept. 24, 1985) and \$200.00 (Mar. 18, 1986) from Whitewater Development to McDougal were not listed on the general ledger, which led the Independent Counsel to assume that the accountant for Whitewater Development netted the loan and repayments from McDougal in arriving at the \$7,000.00; check (unnumbered) from the account of Madison Marketing, signed by Susan McDougal and made payable to Whitewater Development for \$7,500.00 noting, "professional fee"; Madison Guaranty Deposit Ticket for Whitewater Development for \$7,500.00 noting, "Madison Marketing \$7,500.00" (Nov. 8, 1985); Check No. 142 from the account of Whitewater Development signed by James B. McDougal payable to James B. McDougal for \$300.00 noting, "loan"(Sept. 24, 1985); Check No. 151 from the account of Whitewater Development signed by James B. McDougal, payable to James B. McDougal for \$200.00 (Mar. 17, 1986); Lyons Report (Doc. No. DEK001155).

¹¹³ Repayment of loan by Whitewater Development to Tucker-Smith-McDougal. See Check No.146 from the account of Whitewater Development signed by James B. McDougal payable to Tucker-Smith-McDougal for \$400.00 noting, "Loan" (Nov. 19, 1985).

¹¹⁴ Repayment of loan by Whitewater Development to Tucker-Smith-McDougal. See Check No.147 from the account of Whitewater Development signed by James B. McDougal payable to Tucker-Smith-McDougal for \$300.00 noting, "Loan" (Jan. 17, 1986).

¹¹⁵ Repayment of loan by Whitewater Development to Tucker-Smith-McDougal. See Check No. 148 from the account of Whitewater Development signed by James B. McDougal payable to Tucker-Smith-McDougal for \$300.00 noting, "Loan" (Feb. 11, 1986).

¹¹⁶ Check No. 151 from the account of Whitewater Development signed by James B. McDougal payable to James B. McDougal for \$200.00 (Mar. 17, 1986).

¹¹⁷ During 1986, Whitewater Development's accountant reclassified Adjusting Entry No. 3 and reallocated \$17,183.58 of the \$25,000.00 payment to McDougal to Madison Marketing, Tucker-Smith-McDougal and Flowerwood Farms. See Adjusting Entry No. 6 prepared by Whitewater Development's accountant to reallocated note payment (Doc. No. DEK001655). This recalculation was reported in the Lyons Report. See Lyons Report (Doc. No. DEK001155).

¹¹⁸ Repayment of loan by Whitewater Development to Flowerwood Farms. See Whitewater Development Adjusting Entry No. 6 reallocating loan repayment from James B. McDougal to Flowerwood Farms and other McDougal related entities (Doc. No. DEK001655); see also Lyons Report (Doc. No. DEK001155).

¹¹⁹ Repayment of loan to Whitewater Development from Madison Marketing. See Whitewater Development Adjusting Entry No. 6 which reallocated repayment of loan from

James B. McDougal to Madison Marketing and other McDougal related entities (Doc. No. DEK001655); see also Lyons Report (Doc. No. DEK001155).

¹²⁰ Repayment to Smith-McDougal entered on Whitewater Development books via accountant's year end Adjusting Entry No. 6. See Whitewater Development accountant's Adjusting Entry No. 6 reallocating loan repayment from James B. McDougal to Smith-McDougal and other McDougal related entities (Doc. No. DEK001655). The Lyons Report misidentified "Susan" as the recipient of this payment; see also Lyons Report (Doc. No. DEK001155).

¹²¹ Loan to Whitewater Development from Flowerwood Farms. See Check No. 000252 from the account of Flowerwood Farms signed by James B. McDougal payable to Whitewater Development for \$1,000.00 noting, "Loan" (May 29, 1986) (Doc. No. 56-81997-0000224); see also Citizens Bank Deposit Ticket for Whitewater Development for \$1,000.00 noting, "Flowerwood \$1,000.00" (June 3, 1986) (Doc. No. DEK500431).

¹²² Loan to Whitewater Development from Rolling Manor. See Check No. 000258 from the account of Rolling Manor signed by James B. McDougal payable to Whitewater Development for \$1,424.00 noting, "Loan" (May 27, 1986); see also Citizens Bank Deposit Ticket for Whitewater Development for \$1,424.00 (June 3, 1986) (Doc. No. DEK500431).

¹²³ Repayment of loan by Whitewater Development to McDougal. See Check No. 154 from the account of Whitewater Development signed by James B. McDougal made payable to James B. McDougal for \$600.00 noting, "Loan" (July 7, 1986) (Doc. No. DEK501674).

¹²⁴ Repayment of loan by Whitewater Development to McDougal. See Check No. 155 from the account of Whitewater Development signed by James B. McDougal payable to James B. McDougal for \$325.00 noting, "Loan" (July 25, 1986) (Doc. No. 501668).

¹²⁵ Repayment of loan by Whitewater Development to Flowerwood Farms. See Check No. 156 from the account of Whitewater Development signed by James B. McDougal payable to Flowerwood Farms for \$200.00 noting, "Loan" (Aug. 28, 1986) (Doc. No. DEK501692).

¹²⁶ McDougal payment on Whitewater Development's acquisition loan at Citizens Bank. See Check No. 122 from the account of James McDougal signed by S. McDougal payable to First Ozark (formerly Citizens Bank) for \$2,303.78 (Nov. 6, 1986) (Doc. No. 181-0000856).

¹²⁷ Repayment of loan by Whitewater Development to McDougal. See Check No. 159 from the account of Whitewater Development signed by S. McDougal payable to J.B. McDougal for \$1,200.00 noting, "Loan" (Doc. No. DEK501683).

¹²⁸ Payment made by Rolling Manor on Whitewater Development Acquisition Loan No. 5885 at Citizens Bank. See "Notice of Action Taken" slip noting, "We have charged your account number 2301418 with the following: 'Wire to 1st Ozark National, Attn. Ron Proctor -

Loan Payment Number 5885 per Susan McDougal, Name Rolling Manor, Amount \$397.33" (Dec. 30, 1986).

¹²⁹ Loan to Whitewater Development by Flowerwood Farms. On December 30, 1986, Flowerwood Farms wire transferred \$1,418.48 to be applied to Whitewater Development Acquisition Loan No. 5885 at Citizens Bank. The total payment made on this loan at that time was \$1,189.92. Rolling Manor paid an additional \$397.33 on the loan on this same date. The loan was credited with a total payment of \$1,819.92. The difference between the two payments actually made and the credit applied on Loan No. 5885 was \$4.11. This difference was arbitrarily applied to Flowerwood Farms. See "Notice of Action Taken" slip noting, "We have charged your account...in accordance with the following: "wire to 1st Ozark National attn: Ron Proctor - apply to Loan # 5885 per Susan McDougal, Name Flowerwood Farms" (Dec. 30, 1986); Wire transfer documents for \$1,819.92 (Dec. 30, 1986).

¹³⁰ Repayment of loan by Whitewater Development to McDougal. See Check No. 161 from the account of Whitewater Development signed by S. McDougal made payable to Jim B. McDougal for \$620.80 (Mar. 1, 1987) (Doc. No. DEK501620).

¹³¹ Repayment of loan by Whitewater Development to McDougal. See Unnumbered Check from the account of Whitewater Development signed by Susan McDougal payable to Susan McDougal for \$3,477.70 (Sept. 15, 1990) (Doc. No. 70-00116262).

¹³² Repayment of loan by Whitewater Development to McDougal. See Check No. 1008 signed by S. McDougal payable to CASH for \$1,400.00 noting, "Repay Loan" (Nov. 21, 1990) (Doc. No. 70-00049098).

¹³³ Repayment of loan by Whitewater Development to McDougal. See Check No. 1016 from the account of Whitewater Development signed by S. McDougal payable to C. Riley for \$650.00 noting, "Repay Loan to JB Mc" (Doc. No. 70-00116272).

¹³⁴ This check was not deducted as an expense by the Whitewater Development accountant. The notation on the check appears to be erroneous, in view of the treatment of other checks payable to My Paradise, and the nature of the two entities. Accordingly, the OIC treated the payment as a payment on behalf of My Paradise by Whitewater Development. See Canceled Check No. 1021 from the account of Whitewater Development signed by S. McDougal payable to My Paradise for \$200.00 noting, "Prof. Services" (Apr. 19, 1991) (Doc. No. 70-00116276).

¹³⁵ Check from Whitewater Development payable to CFSB which was endorsed "Paradise." See Check No. 1022 from the account of Whitewater Development signed by S. McDougal payable to CFSB for \$500.00 noting, "Deposit" (May 20, 1991) (Doc. No. 70-00116278).

¹³⁶ Whitewater Development check endorsed over to McDougal's mother. Rosalee Wade wrote a check to Whitewater Development out of the Earl J. Stafford, Trustee account for payment on lot number 27. This check was endorsed by Whitewater Development over to

Lorene McDougal, who was James B. McDougal's mother. See Check No. 845 from the account of Earl J. Stafford, Trustee signed by Rosalee Wade payable to Whitewater Development for \$5,656.70 noting, "proceeds-WW no. 27" (May 21, 1991) (Doc. No. 335-0002426).

¹³⁷ Check from Whitewater Development payable to CFSB which was endorsed "Paradise Inc." See Check No. 1023 from the account of Whitewater Development signed by S. McDougal payable to CFSB for \$1,300.00 noting, "Paradise Inc." (May 22, 1991) (Doc. No. 70-00116278).

¹³⁸ Check from Whitewater Development payable to My Paradise; the endorsement is not legible. See Check No. 1024 from the account of Whitewater Development signed by S. McDougal payable to My Paradise for \$490.00 (June 20, 1991).

¹³⁹ Whitewater Development check payable to and endorsed by Lorene McDougal. See Check No. 1025 from the account of Whitewater Development signed by S. McDougal payable to Lorene McDougal for \$550.00 noting, "payment" (Doc. No. 828-0000022).

¹⁴⁰ Payment by Whitewater Development of Great Southern's taxes. See Check No. 1027 from the account of Whitewater Development signed by S. McDougal payable to Secretary of State for \$296.40 noting, "Great Southern - Taxes" (July 16, 1991) (Doc. No. 70-00116248).

¹⁴¹ Whitewater Development check payable to VISA noted "Reimbursement C. Riley." Ms. Riley, a long time friend of McDougal, was not a creditor of Whitewater Development. This check was not deducted as a Whitewater Development expense. See Check No. 1029 from the account of Whitewater Development signed by S. McDougal payable to VISA for \$532.00 noting, "Reimbursement C. Riley 442812_51 7178 1349" (Doc. No. 70-00116254); see also Claudia Riley 3/10/95 Int. (describing her relationship with McDougal).

¹⁴² Rosalee Wade wrote an Ozark Escrow check to Whitewater Development which was endorsed by Whitewater Development over to Lorene McDougal. See Check No. 1976 from the account of Ozark Escrow signed by Rosalee Wade payable to Whitewater Development for \$76.85 noting, "Branson" (Doc. No. 208-0000133).

¹⁴³ Wade wrote an Ozark Air check to Whitewater Development which was endorsed by Whitewater Development to Lorene McDougal. See Check No. 19 from the account of Ozark Air signed by C. Wade payable to Whitewater Development for \$678.00 noting, "Loan no. 5885." (Doc. No. 335-00028086).

¹⁴⁴ Check from the account of Whitewater Development payable to Paradise, Inc. See Check No. 1032 from the account of Whitewater Development signed by S. McDougal payable to Paradise Inc. for \$400.00 noting, "Loan Payment" (Nov. 5, 1991) (Doc. No. 70-00116256).

¹⁴⁵ Check from the account of Ozark Escrow, payable to Whitewater Development and endorsed by Whitewater Development. The check was then endorsed by and deposited into the account of My Paradise (Doc. No. 208-00000136). See Check No. 2172 from the account of

Ozark Escrow signed by Earl J. Stafford payable to Whitewater Development for \$76.85 (Nov. 22, 1991) (Doc. No. 208-00000135).

¹⁴⁶ Check from the account of Ozark Air Services payable to Whitewater Development and endorsed by Whitewater Development. This check was endorsed by and deposited into the account of My Paradise (Doc. No. 335-00028100). See Check No. 21 from the account of Ozark Air Services signed by C. Wade payable to Whitewater Development for \$432.00 noting, "# 5885." (Doc. No. 335-00028099).

¹⁴⁷ Check from the account of Ozark Air Services payable to Whitewater Development. This check was endorsed by and deposited into the account of My Paradise, Inc. See Check No. 23 from the account of Ozark Air Services signed by C. Wade payable to Whitewater Development for \$924.00 noting, "# 5885" (Dec. 11, 1991) (Doc. No. 335-00028101).

¹⁴⁸ Ozark Escrow check to Whitewater Development for Parker and Brennan lot payments was endorsed to James McDougal. See Check No. 2283 from the account of Ozark Escrow signed by Rosalee Wade payable to Whitewater Development for \$247.85 noting, "Parker Brennan" (Doc. No. 208-00000137).

¹⁴⁹ Ozark Escrow check to Whitewater Development for Parker lot payment was endorsed to James B. McDougal. See Check No. 2289 from the account of Ozark Escrow signed by Rosalee Wade payable to Whitewater Development for \$173.00 noting, "Parker" (Doc. No. 208-00000139).

¹⁵⁰ Ozark Air check to Whitewater Development for payment on Loan No. 5885 which was endorsed over to McDougal. See Check No. 26 from the account of Ozark Air Services signed by C. Wade payable to Whitewater Development Co. for \$678.00 noting, "Note # 5885." (Doc. No. 335-00028108).

¹⁵¹ Ozark Air check to Whitewater Development for payment on Citizens Bank note no. 5885 which was endorsed over to McDougal. See Check No. 27. from the account of Ozark Air Service, Inc signed by C. Wade payable to Whitewater Development for \$246.00 noting, "Loan # 5885" (Feb. 14, 1992) (Doc. No. 335-00028117).

¹⁵² See Check No. 1034 from the account of Whitewater Development signed by Ms. McDougal payable to McDougal for \$500.00 noting, "Loan Payment" (Apr. 3, 1992) (Doc. No. 70-00108457).

¹⁵³ See Check No.102 from the account of Ozark Air Service, Inc. signed by C. Wade payable to Whitewater Development for \$678.00 noting, "Loan no. 5885." This check was endorsed over to McDougal from Whitewater Development (Apr. 6, 1992) (Doc. No. 335-00028130).

¹⁵⁴ See Check No. 105 from the account of Ozark Air Service signed by C. Wade payable to Whitewater Development Co. Inc. for \$678.00 noting, "Loan # 5885"(May 18, 1992) (Doc. No. 335-00028142).

¹⁵⁵ The Lyons Report correctly reported Great Southern as the source of this payment, which was applied to the interest on Whitewater Development's Acquisition Loan No. 5885 at Citizens Bank. It did not report that the Clintons reimbursed Great Southern for this advance via their Check No. 697, in the amount of \$10,130.58. See Check No. 697 from the account of Bill Clinton or Hillary Rodham payable to Great Southern Land Co. for \$10,130.58 (Dec. 28, 1978) (Doc. No. DEK006616); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

¹⁵⁶ The Lyons Report correctly reported Great Southern as the source of this payment, which was applied to the interest on Whitewater Development's Loan No. 4197 at Union National. It did not report that the Clintons reimbursed Great Southern for this advance via their Check No. 697 in the amount of \$10,130.58. See Check No. 697 from the account of Bill Clinton or Hillary Rodham payable to Great Southern Land Co. for \$10,130.58 (Dec. 28, 1978) (Doc. No. DEK006616); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

¹⁵⁷ The Lyons Report reduced the total of the Great Southern payments to Whitewater Development by \$10,130.56. The Clinton check was, however, actually for \$10,130.58. See Check No. 697 from the account of Bill Clinton or Hillary Rodham payable to Great Southern Land Company, Inc. for \$10,130.58 (Dec. 28, 1978) (Doc. No. DEK006616); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

¹⁵⁸ The Lyons Report credited Great Southern with this interest payment that, together with an interest payment made on Feb. 5, 1979, totaled \$4,602.81. Great Southern actually made payments on the Whitewater Development Acquisition Loan No. 5885 at Citizens Bank of \$4,377.68 and \$225.13. These payments also total \$4,602.81. The Clintons reimbursed Great Southern for the \$4,377.68 payment via their Check No. 697 in the amount of \$10,130.58. See Check No. 697 from the account of Bill Clinton or Hillary Rodham payable to Great Southern Land Company, Inc. for \$10,130.58 (Dec. 28, 1978) (Doc. No. DEK006616). The \$225.13 payment was not reimbursed by the Clintons and is included in the Independent Counsel totals for Great Southern. See Citizens Bank Note Due Notice showing a payment of \$225.13; Workpaper prepared by Whitewater Development accountant showing that Great Southern made a \$225.13 payment; see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

¹⁵⁹ The Lyons Report credited Great Southern with this interest payment that, together with an interest payment made on January 27, 1979, totaled \$4,602.81. Great Southern actually made payments on the Whitewater Development Acquisition Loan No. 5885 at Citizens Bank of \$4,377.68 and \$225.13. These payments also total \$4,602.81. The Clintons reimbursed Great Southern for the \$4,377.68 payment via their Check No. 697 in the amount of \$10,130.58. See Check No. 697 from the account of Bill Clinton or Hillary Rodham payable to Great Southern

Land Co. for \$10,130.58 (Dec. 28, 1978) (Doc. No. DEK006616). The \$225.13 payment was not reimbursed by the Clintons and is included in the Independent Counsel totals for Great Southern. See Citizens Bank Note Due Notice showing a payment of \$225.13; Workpaper prepared by Whitewater Development accountant showing that Great Southern made a \$225.13 payment; see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

¹⁶⁰ This payment was incorrectly included on the Lyons Report Workpaper (Mar. 18, 1992) (Doc. No. DEK001160) as an interest payment on the Whitewater Development Acquisition Loan No. 5885 at Citizens Bank. This payment was excluded from the Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1, Loans and Advances by McDougals and Clintons, dated March 23, 1992. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152); Lyons Report Workpaper (Mar. 18, 1992) (Doc. No. DEK 001160); Final Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1, Loans and Advances by McDougals and Clintons (Mar. 23, 1992) (Doc. No. 863-000000174).

¹⁶¹ This amount must be added to the Lyons' total for Fiscal Year 1979 to reconcile the Draft and Final Lyons Reports. The Independent Counsel did not find a corresponding expenditure.

¹⁶² This payment was incorrectly included on the Lyons Report Workpaper (Mar. 18, 1992) (Doc. No. DEK001160) as an interest payment on the Whitewater Development Acquisition Loan No. 5885 at Citizens Bank. This payment was excluded from the Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1, Loans and Advances by McDougals and Clintons, dated March 23, 1992; see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152); Lyons Report Workpaper (Mar. 18, 1992) (Doc. No. DEK 001160); Final Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1, Loans and Advances by McDougals and Clintons (Mar. 23, 1992) (Doc. No. 863-000000174).

¹⁶³ This payment was incorrectly included on the Lyons Report Workpaper (Mar. 18, 1992) (Doc. No. DEK001160) as an interest payment on the Whitewater Development Acquisition Loan No. 4197 at Union National. This payment was excluded from the Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1, Loans and Advances by McDougals and Clintons. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152); Lyons Report Workpaper (Mar. 18, 1992) (Doc. No. DEK 001160); Final Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1, Loans and Advances by McDougals and Clintons (Mar. 23, 1992) (Doc. No. 863-000000174).

¹⁶⁴ This payment was incorrectly included on the Lyons Report Workpaper dated March 18, 1992 (Doc. No. DEK001160) as an interest payment on the Whitewater Development Acquisition Loan No. 5885 at Citizens Bank. This payment was excluded from the Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1, Loans and Advances by McDougals and Clintons, dated March 23, 1992. See Lyons Report Analysis of Source and Use

of Cash (Mar. 18, 1992) (Doc. No. DEK001152); Lyons Report Workpaper (Mar. 18, 1992) (Doc. No. DEK 001160); Final Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1, Loans and Advances by McDougals and Clintons (Mar. 23, 1992) (Doc. No. 863-000000174).

¹⁶⁵ Purchase of Whitewater Development stock by Great Southern. See Whitewater Development adjusting entry showing purchase of stock by Great Southern; Union National Deposit Ticket for Whitewater Development for \$500.00 (Feb. 21, 1986) (DEK003029); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152).

¹⁶⁶ Deposit made in error to Whitewater Development account at Bank of Kingston. These funds were income of Great Southern. The error was discovered by the Whitewater Development accountant and Whitewater Development repaid Great Southern. See Bank of Kingston Deposit Ticket for Whitewater Development for \$99.00 noting, "Gross \$99.00" (Apr. 20, 1981); Check No. 125 from the account of Whitewater Development signed by Blenda Howard payable to Great Southern for \$99.00 (Nov. 6, 1981) (Doc. No. DEK 500598); Whitewater Development checkbook register for Check No.125 noting, "Gross check dep. in error 4/20/81" (Nov. 6, 1981); Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

¹⁶⁷ This entry reflected a lot payment by Edwina and Ray McCracken on a note receivable sold to Whitewater Development by Arkansas Ventures. This payment was not related to any investment made by the McDougals. See Ozarks Realty Escrow Account Receipt, no. 004024, dated October 30, 1981, which noted \$941.33 received from Edwina McCracken for (A.V.) Whitewater Dev."; Bank of Kingston Deposit Ticket for Whitewater Development for \$939.33 noting, "A.V. To McCracken, \$939.33" (Nov. 3, 1981); see also Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

¹⁶⁸ The repayment of the deposit was made in error. This error was corrected in the entry dated April 20, 1981. Bank of Kingston Deposit Ticket for Whitewater Development for \$99.00 noting, "Gross \$99.00"(DEK 500598) (Apr. 20, 1981); see Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001153).

¹⁶⁹ This entry reflected a Lot payment by Edwina and Ray McCracken on a note receivable sold to Whitewater Development from Arkansas Ventures. This payment was not related to any investment made by the McDougals. See Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001154).

¹⁷⁰ The Final Lyons Report included this total of three transactions, which the Independent Counsel accounted for separately. The repayments occurred on November 19, 1985 (\$400.00); January 17, 1986 (\$300.00); and February 11, 1986 (\$300.00). See Check No. 146 from the account of Whitewater Development signed by James B. McDougal payable to Tucker-Smith-McDougal for \$400.00 (Nov. 19, 1985), Check No. 147 from the account of Whitewater Development signed by James B. McDougal payable to Tucker-Smith-McDougal for \$300.00 (Jan. 17, 1986), Check No. 148 from the account of Whitewater Development signed by James

McDougal payable to Tucker-Smith-McDougal noting, "Loan"(Feb. 11, 1986); see Lyons Report (Doc. No. DEK001155).

¹⁷¹ The Lyons Report erroneously attributed this payment to James B. McDougal. In actuality, this amount represented a payment by Ozark Air on the \$35,000.00 it assumed as part of the purchase price for twenty-four Lots from Whitewater Development in 1985. See Computerized List of Ozark Air's Escrow Pay Schedule (Doc. No. DEK001929); Whitewater Development Statement of Account No. 3175 at Citizens Bank for the month ending Oct. 30, 1985 showing deposit of \$1,200.00 (Doc. No. 337-00000468); Document on 1st Ozark letterhead listing all payments made by Ozark Air on Loan No. 5885, including this payment (Doc. No. 337-0000397); see also Lyons Report (Doc. No. DEK001155).

¹⁷² The Final Lyons Report showed that Great Southern received repayment(s) of \$10,711.06 at some point between May 31, 1989, and May 31, 1991, because the Great Southern balance decreases by \$10,711.06 (\$46,397.98 - \$35,686.92 = \$10,711.06). No explanation for this reduction was given, nor was any reason for this reduction determined. See Final Lyons Report Analysis of Source and Use of Cash (Mar. 18, 1992) (Doc. No. DEK001152); Final Lyons Report (Mar. 23, 1992) (Doc. No. 863-0000179).

¹⁷³ The Lyons Report "Reconstructed Comparative Balance Sheets; Schedule 1 - Loans and Advances by McDougals and Clintons," noted "See Accompanying Consultants' Report Dated March 23, 1992," indicated that Whitewater Development repaid McDougal \$4,144.98 between May 31, 1989 and May 31, 1991. No explanation for this reduction is given in the report and the amount does not appear on the Lyons Report (Doc. No. DEK001155) (which lists individual amounts included in the totals for the various entities); Final Lyons Report, Reconstructed Comparative Balance Sheets, Schedule 1 (Mar. 23, 1992) (Doc. No. 863-000000179).