

## **PART 3      CONTRIBUTION LAUNDERING/THIRD-PARTY TRANSFERS**

### **Chapter 21: Contributions to the Democratic Party**

A major focus of the Committee's investigation was the allegation that the Democratic National Committee ("DNC") received contributions during the 1996 election cycle that were paid for by someone other than the contributor of record and possibly with foreign funds. The Committee examined a number of these alleged contributions, including those from Keshi Zhan, Yue Chu and Xiping Wang; Pauline Kanchanalak; Yogesh Gandhi; Arief and Soroya Wiriadinata; the Lum family; and persons associated with the Hsi Lai Temple branch of the Fokuangshan Buddhist sect. In each case, the Committee attempted to determine whether the contributions made in the names of these individuals were paid for by another, and whether DNC officials knew or should have known of any misconduct.

### **FINDINGS**

**(1) The evidence before the Committee shows that a number of individuals made contributions to the DNC or Democratic organizations in the name of others.** Some of these were hard (restricted) money contributions, in which case they may be improper or illegal; some of these were soft (unrestricted) money contributions, in which case they may be technically legal, but result in inaccurate contribution records at the FEC. Among those whose activities the Committee investigated are:

**(A) Charlie Trie/Ng Lap Seng ("Wu"):** Trie and Wu used Keshi Zahn to arrange to have two legal permanent residents, Yue Chu and Xiping Wang, contribute \$28,000 in hard (restricted) money to Democratic campaign organizations and reimbursed them. There is no evidence before the Committee to suggest that either Chu or Wang understood that their actions potentially violated campaign finance laws. Trie and Wu also used Zahn to make a \$12,500 hard (restricted) money contribution to the DNC.

**(B) Pauline Kanchanalak:** Kanchanalak used her mother-in-law's money to fund \$253,500 in contributions to the DNC, \$26,000 of which was hard (restricted) money. Although both Pauline Kanchanalak and her mother-in-law Praitun Kanchanalak were legal permanent residents of the U.S. and each, therefore, lawfully could make contributions in her own name, the \$26,000 contribution of her mother-in-law's money in Kanchanalak's name appears to violate Section 441f.

(C) **Yogesh Gandhi:** Gandhi, a legal permanent resident, appears to have used an associate's foreign-source money to fund a \$325,000 contribution in soft (unrestricted) money in connection with a DNC fundraiser. Gandhi's bank records reveal that he would not have been able to make that contribution without significant wire transfers from Yoshio Tanaka, a Japanese national who attended a DNC fundraiser with Gandhi. Evidence before the Committee supports the conclusion that Tanaka transferred the money to fund Gandhi's contribution.

(D) **Arief and Soraya Wiriadinata:** The Wiriadinatas, at one time legal permanent residents, made contributions of over \$425,000 to the DNC, \$20,000 of which appears to be hard (restricted) money contributions. The contributions were made in checks drawn on bank accounts funded with overseas transfers from Soraya Wiriadinata's father. In light of representations from Soraya Wiriadinata that her father transferred Soraya's own money, the evidence before the Committee does not establish that the \$20,000 in hard money contributions came from another.

(2) **The evidence before the Committee does not support a finding that any DNC official knowingly solicited or accepted contributions given in the name of another.**

### **Hsi Lai Temple Event**

On April 29, 1996, Vice President Gore attended a DNC-sponsored and John Huang-organized event at the Hsi Lai Temple in Hacienda Heights, California. Vice President Gore's briefing papers for the event described it as an outreach event with members of the Asian-American community, but much controversy has arisen regarding allegations that the DNC improperly used a religious institution to host a fundraising event and that the Temple funneled money through its monastics to the DNC.

Based on the evidence before the Committee, we make the following findings regarding the event at the Hsi Lai Temple:

(3) **From the perspective of Vice President Gore and DNC officials, the Hsi Lai Temple event was not a fundraiser. There is no evidence before the Committee that Vice President Gore knew that contributions were solicited or received in relation to the Temple event.** The information received by the Vice President regarding the event described it as an opportunity for the Vice President to meet with members of the local Asian-American community. John

Huang assured DNC Finance Director Richard Sullivan that the event was not a fundraiser, but instead would involve community outreach. Moreover, the event had none of the features of a fundraiser: no tickets were taken or sold at the door; the speakers did not solicit donations; and many of those who attended did not contribute to the DNC.

**(4) John Huang and Maria Hsia used Vice President Gore's appearance at the Temple to raise money for the DNC.** Although the event itself was not a fundraiser, Huang and Hsia, unbeknownst to DNC officials or the Vice President, used it as an opportunity to raise money for the DNC. Both before and after the event, they suggested to Temple officials that they collect contributions in connection with the Temple event. Their efforts eventually yielded \$65,000 in contributions from persons associated with the Temple.

**(5) There is no evidence before the Committee to suggest that the money donated in connection with the Hsi Lai Temple event was foreign in origin.**

**(6) Many of the donations made in connection with the Hsi Lai Temple event appear to have violated federal campaign laws prohibiting contributions in the name of another.** The Temple reimbursed the monastic donors for their contributions. There is evidence to suggest that most of those writing the checks did not understand that they were potentially violating federal election law. Nevertheless, there appears to be little doubt that most, if not all, wrote the checks to the DNC only because the Temple asked them to do so and with the understanding that they would not fund the contributions themselves.

**(7) There is no evidence before the Committee that any DNC official knew that contributions made by Hsi Lai Temple monastics were of questionable legality.**

#### **KESHI ZHAN, YUE CHU AND XIPING WANG**

The Committee examined several contributions made by three persons, Keshi Zhan, Yue Chu and Xiping Wang, associated with Charlie Trie and Ng Lap Seng (also known as Wu), Trie's Macao-based business associate.<sup>1</sup> All three appear to have been reimbursed by Trie and Wu for contributions made to the DNC in 1996. The DNC has returned all contributions made by Zhan, Chu and Wang.<sup>2</sup>

Keshi Zhan is a legal permanent resident of the United States and eligible to make campaign contributions. She is a local government employee, but apparently has also worked on occasion for Trie and Wu.<sup>3</sup> In February 1996, in connection with a DNC fundraiser at the Hay Adams Hotel in Washington, D.C., co-chaired by Trie, Zhan made a hard money contribution of \$12,500 to the DNC. Bank records produced to the Committee show that Zhan wrote a check to

herself for \$12,500 drawn from a bank account controlled by Trie and Wu, and deposited that check into her personal bank account on the same day that she wrote the \$12,500 check to the DNC. Committee investigator Jerry Campana testified before the Committee that it was his conclusion that the check from Trie and Wu's account was a reimbursement of her contribution.<sup>4</sup>

Yue Chu and Xiping Wang are two women who were born in China and are now legal permanent residents who have lived in the U.S. for several years.<sup>5</sup> They are related by marriage.<sup>6</sup> Chu's husband, Ming Chen, is employed by Wu in a restaurant in Beijing.<sup>7</sup> Chu and Wang testified before the Committee on July 29, 1997, pursuant to a grant of immunity from prosecution.<sup>8</sup> In sum, Chu and Wang testified that they contributed a total of \$27,000 to the Democratic Party at the request of Chu's husband and Zhan and were later reimbursed.

Chu testified that she first met Zhan in 1991, when Zhan was a classmate of Chu's husband at the University of the District of Columbia. Chu and Zhan became friends.<sup>9</sup> On November 14, 1995, Zhan asked Chu to write a check for \$2,000 to the Democratic Senatorial Campaign Committee. She also asked Chu to write a \$1,000 check to Zhan herself. The next day, Zhan repaid Chu with a check for \$3,000. Chu testified that it was her understanding at the time that Zhan wanted Chu to lend her some money, and she did not ask Zhan the reason. She also testified that she did not know what the initials "DSCC" stood for at the time she wrote the \$2,000 check, and that she did not know that this check represented a political contribution.<sup>10</sup>

In February 1996, Chu's husband, Ming Chen, returned to the U.S. from China for the Chinese New Year holidays. According to Chu, her husband said that his boss, Wu, wanted to visit the White House and needed \$25,000 to "buy a ticket."<sup>11</sup> Chu testified that they had sufficient funds to provide only \$20,000, and asked Chen's cousin, Xiping Wang, for the remaining \$5,000. Wang provided a check in that amount.<sup>12</sup>

On February 19, 1996, Chu gave Zhan two checks which were blank except for her signature. Zhan made out both checks to the DNC, in the amounts of \$12,500 and \$7,500. Chu testified that she did not know what the initials "DNC" meant.<sup>13</sup> At the time she gave Zhan the two checks, Chu was given two checks from Zhan in identical amounts. Chu stated that this seemed unusual to her, but that she did not ask any questions at the time. She indicated that her primary consideration at the time was that her husband's boss needed help to buy a ticket and she had been asked to provide that help.<sup>14</sup> Chu testified that she did not know whose money was used to reimburse her.<sup>15</sup> She also testified that although she had once met Trie, she only knew of him as a business associate of Wu.<sup>16</sup>

On January 28, 1998, the Department of Justice indicted Trie for conspiring to defraud the DNC and FEC, in part, by "channel[ing] foreign money to the DNC through the use of straw or conduit contributions"; "conceal[ing] the source of the money contributed by reimbursing conduits in cash and using multiple bank accounts;" and "caus[ing] the DNC to file false campaign finance reports with the FEC."<sup>17</sup> The Zhan contribution appears to be identified in the Trie indictment as an illegal conduit contribution; the Chu and Wang contributions are not included, presumably due to the Committee's decision to grant both women immunity from prosecution.<sup>18</sup>

The evidence before the Committee is convincing that Zhan, Chu and Wang were used as conduits for contributions financed by Trie and Wu, in connection with a fundraiser co-chaired by Trie and attended by Wu as Trie's guest. The evidence suggests that while Chu and Wang may have been unaware of their participation in a contribution conduit scheme, Trie, Wu and Zhan appear to have been aware of the legal prohibition against contributions by foreign nationals. The Committee's investigation found no evidence that, at the time of the contributions, anyone at the DNC knew or had reason to know that the Zahn, Chu and Wang contributions were being financed by Trie and Wu.<sup>19</sup> Zhan, Chu and Wang were legal permanent residents eligible to make campaign contributions, and their checks were drawn on local U.S. banks in amounts that were substantial, but not so large as to trigger special inquiry. Neither the DNC nor the White House had access to or were aware of the bank records demonstrating the reimbursements.<sup>20</sup> The Trie indictment does not cite any facts suggesting that anyone at the DNC or the White House was aware of Trie's misconduct with respect to these or any other conduit contributions.<sup>21</sup>

In addition to the Zhan contribution, the Trie indictment identifies a number of other conduit contributions involving Trie, in particular in connection with an August 1996 Radio City Music Hall fundraiser in New York celebrating President Clinton's 50th birthday.<sup>22</sup> The indictment charges that \$200,000 in funds from abroad were wired transferred into a bank account belonging to Trie who then solicited and reimbursed two conduit contributions to the DNC totaling \$20,000.<sup>23</sup> The indictment charges that \$80,000 was also transferred from the Trie account to a California bank account, which Trie's business associate then used to solicit and reimburse five conduit contributions to the DNC totaling \$40,000.<sup>24</sup> While the Committee did not obtain independent evidence on these conduit contributions, the charges in the indictment provide additional reason to believe that Trie was involved in a number of conduit contributions to the DNC utilizing foreign funds. Trie's activities are discussed more fully in Chapter 5 of this Minority Report.

### **PAULINE KANCHANALAK**

Born in Thailand, Pauline Kanchanalak is a legal permanent resident of the United States.<sup>25</sup> She earned graduate degrees from the University of Pittsburgh and Stanford and, in the 1980s, married Chupong "Jeb" Kanchanalak, the son of a prominent, wealthy Thai family residing in the United States since the 1950s.<sup>26</sup>

Kanchanalak and her husband began a consulting business known as Ban Chang International ("BCI") in the early 1990s. This company sought to develop joint ventures between U.S. and Thai companies and to establish franchises of U.S. companies in Thailand. Jeb Kanchanalak served as managing director of BCI's Thailand operations, while Pauline managed the company's U.S. operations. Pauline Kanchanalak is also the Washington representative of a Thai conglomerate, the Ban Chang Group. In 1992, a group of Thai corporations -- with the support of the Thai government -- established an umbrella group called the U.S.-Thailand Business Council to promote trade with the United States. Jeb Kanchanalak was named executive director of the Thailand branch of the council. In 1994, the U.S. branch of the council was

established.<sup>27</sup> The president of the U.S. branch was Karl D. Jackson, a Republican foreign policy expert.<sup>28</sup> Pauline Kanchanalak also was active in the U.S. branch of the council.

FEC records list Kanchanalak as having contributed \$1,000 to the DNC in 1993, \$62,500 in 1994 and nothing until 1996 when she contributed \$190,000 for a three-year total of \$253,500. All but \$26,000 were soft money donations.<sup>29</sup>

Kanchanalak's contributions brought her status as a DNC managing trustee and wide-ranging access to the White House and the President.<sup>30</sup> A summary document of U.S. Secret Service WAVE records shows that in the nearly four-year period between January 20, 1993, and November 30, 1996, Kanchanalak visited the White House 26 times, including ten visits at which the President was present. These visits included such events as DNC trustees' receptions, lunches, dinners, and coffees; a presidential radio address; and a meeting of the U.S.-Thai Business Council.<sup>31</sup> At one coffee, she was permitted to bring as her guests a group of visiting Thai businessmen.<sup>32</sup>

After press reports raised questions about Kanchanalak's contributions, the head of the DNC's managing trustee program, Ari Swiller, contacted her. In a memorandum dated November 20, 1996, Swiller describes the substance of his conversation with Kanchanalak.<sup>33</sup> According to Swiller's memorandum, "she stated that she had not made any contributions to the DNC and that all contributions came from her mother-in-law, Praitun Kanchanalak."<sup>34</sup> The memorandum states:

Pauline explained that this was an arrangement she made with Vic Raiser during the 1992 campaign. I asked her if she ever discussed that arrangement with anyone other than Mr. Raiser, specifically Richard Sullivan, Lauren Supina, John Huang or me. She clearly stated that she never indicated that contributions from P. Kanchanalak were not from her.<sup>35</sup>

Under this alleged arrangement between Kanchanalak and Raiser, the DNC's 1992 finance chair, she was credited with contributions made by "P. Kanchanalak," even though the contributions were financed with funds belonging to her mother-in-law, Praitun Kanchanalak. Praitun Kanchanalak is a legal permanent resident who is also eligible to contribute.

A Committee review of the contribution checks credited to Kanchanalak confirms that they were each signed "P. Kanchanalak." No evidence before the Committee indicates that DNC personnel during the 1996 election cycle were aware of Kanchanalak's alleged arrangement. Kanchanalak told Swiller that she had never discussed the arrangement with anyone other than Raiser. She also stated to him that she had never indicated that contributions from "P. Kanchanalak" were not from her. Moreover, there was no reason for DNC officials in 1996 to suspect that these contributions were not her own, since, by then, Pauline Kanchanalak was a wealthy international businesswoman and a DNC managing trustee with a history of contributions. In addition, separate contributions had been received from, and credited to, Pauline's mother-in-law, Praitun Kanchanalak. In light of these facts, there would have been no reason to suspect that

Pauline's contributions represented funds from Praitun.

While questions were raised at the hearing regarding whether Kanchanalak or her mother-in-law used foreign funds for the contributions, there is no evidence that foreign nationals directed the contributions. Moreover, their status as legal permanent residents permits them to use their personal funds for campaign contributions, even if earned abroad. Additionally, as \$227,500 of the \$253,500 in contributions were soft money donations, it is unclear that these contributions were made in violation of 2 USC 441f's prohibition against contributions in the name of another. Nonetheless, the DNC has returned all the contributions to Praitun Kanchanalak.

### **YOGESH GANDHI**

In May 1996, Yogesh K. Gandhi made a \$325,000 contribution to the DNC in order to attend an Asian American fundraising event at which President Clinton would be present. The evidence before the Committee suggests that Gandhi paid for the contribution with funds provided by a Japanese national. DNC records identifying Trie as the "solicitor" of the contribution and Huang as the "DNC contact."<sup>36</sup>

Gandhi, born Yogesh Kothari, is a distant relative of Mahatma Gandhi.<sup>37</sup> In 1983, Kothari changed his name to Gandhi, moved to the United States, and became a legal permanent resident. He is eligible to make campaign contributions. He established the Gandhi Memorial International Foundation purportedly to promote the ideas of Mahatma Gandhi. An immediate descendant of Mahatma Gandhi, however, has publicly stated that Yogesh Gandhi is a "scam artist" interested primarily in enriching himself.<sup>38</sup>

The Gandhi Memorial International Foundation periodically presents the Mahatma Gandhi World Peace Award to prominent individuals. Past recipients have included Ronald Reagan, Corazon Aquino, and Mikhail Gorbachev. In 1987, the award was given to Ryochi Sasakawa, a controversial, wealthy Japanese businessman who was jailed for suspected war crimes by the Americans after World War II and has been accused of links to organized crime and extreme rightists. One year after receiving the Gandhi award, Sasakawa donated \$500,000 to the Gandhi Foundation.<sup>39</sup>

In 1995, the foundation gave the Gandhi award to Hogen Fukunaga, a Japanese multimillionaire who runs a controversial religious organization in Japan and faces multiple legal problems in Japan from people claiming to have been defrauded by his organization.<sup>40</sup> Press reports indicate that Fukunaga has taken part in a number of highly publicized events arranged by Yogesh Gandhi, including an audience with Pope John Paul II, a meeting with Mother Teresa and participation in a United Nations conference in Turkey. These events were apparently funded by a Japanese associate of both Gandhi and Fukunaga named Yoshio Tanaka. Tanaka is a businessman who is apparently involved in unknown business ventures with Gandhi and who brought Gandhi together with Fukunaga.<sup>41</sup>

In late September 1995, Gandhi sent letters to President and Mrs. Clinton inviting them to

attend an October 2, 1995 ceremony celebrating the 125th anniversary of Mahatma Gandhi's birth, at which time the Gandhi Foundation's World Peace Award would be presented to Fukunaga.<sup>42</sup> The White House declined the invitation. On November 12, Gandhi wrote again to the President asking for 30 minutes of his time for presentation of the gift of a leather-bound collection of the writings of Mohandas Gandhi.<sup>43</sup> This gift was declined by the White House on January 3, 1996.<sup>44</sup>

On February 5, 1996, Gandhi wrote to the President once again, this time informing him that he had been selected as the recipient of the 1996 Mahatma Gandhi World Peace Award.<sup>45</sup> In a separate letter the same day, Gandhi wrote seeking a date to present the award.<sup>46</sup> In response, the White House scheduling office sent out a routine internal inquiry seeking opinions on whether or not the President should accept the award.<sup>47</sup> Ann Eder of the White House Office of Public Liaison testified in a deposition that she believed preliminary information was obtained on Gandhi and his foundation indicating that the foundation was not reputable.<sup>48</sup> The White House staff also located an article discussing the presentation of the award to the controversial Sasakawa.<sup>49</sup> On April 17, 1996, the scheduling office wrote to inform Gandhi that the President would not be able to accept the foundation's award.<sup>50</sup>

Having been turned down three times in his efforts to gain a meeting with the President, Gandhi took a new approach. According to an interview Gandhi provided to Committee staff,<sup>51</sup> a friend of his from Houston alerted him to an Asian-American fundraising event that would be taking place in Washington, D.C. at which the President would be present. Gandhi told Committee staff that on the day of the event, May 13, 1996, Charlie Trie visited him at his hotel in Washington and suggested a contribution of \$500,000 for Gandhi and 25 other individuals to attend the DNC fundraiser at the Sheraton Carlton Hotel. According to Gandhi, he negotiated with Trie and ultimately gave Trie a check drawn on his personal account for \$325,000 in exchange for 26 tickets to the event.

Gandhi's contribution represented tickets to a fundraising dinner for 13 couples. Among the guests Gandhi brought to the dinner were Fukunaga and Tanaka. Although Gandhi said that his attendance at the dinner was not for the purpose of giving the Gandhi award to the President, Fukunaga told the media that he made the trip to Washington specifically for that purpose.<sup>52</sup> The entire \$325,000 was attributed to a soft money account.<sup>53</sup>

According to Gandhi, during the dinner he approached individuals about presenting the award to the President. Gandhi claims that he contacted Secret Service agents present at the dinner and that they set up the award presentation.<sup>54</sup> According to a deposition provided by the DNC general counsel, the persons responsible for allowing the presentation to be made were then White House Chief of Personnel Craig Livingstone, who was handling advance duties for the event, and John Huang.<sup>55</sup> The presentation was apparently hastily arranged in a room near the dinner area and lasted only a few minutes. The award was presented to President Clinton by Gandhi and Fukunaga. Soon thereafter, photographs of Fukunaga and Gandhi with the President appeared on Fukunaga's Internet website.<sup>56</sup>



DNC general counsel Joseph Sandler testified at a deposition that, five months after the event, when he asked Huang about the Gandhi contribution, Huang told him that Gandhi had been referred to him by an Indian American activist, who indicated that Gandhi was interested in attending a DNC event with the President and presenting the President with an award.<sup>57</sup> Gandhi stated in his interview that he never met or spoke with Huang until the dinner itself.<sup>58</sup>

DNC finance director Richard Sullivan testified at a deposition that after the May 1996 event, he asked Huang about the Gandhi check, and Huang told him he wanted to have DNC general counsel Sandler look into it.<sup>59</sup> Sandler testified that Huang did not bring the check to him for review.<sup>60</sup> According to Sullivan, Huang held the check for as long as six days. It is unclear whether Huang held the check in order to evaluate Gandhi's eligibility to contribute, or because Gandhi had asked him to hold the check until additional funds were transferred into the account to cover the \$325,000 check.<sup>61</sup>

Several months later, in October 1996, newspaper articles began reporting that Gandhi appeared to be insolvent. One article published on October 23, reported an outstanding tax lien, revocation of Gandhi's driving license for failure to pay traffic fines, unpaid bills, and a divorce petition in which Gandhi claimed pauper status to avoid paying a filing fee.<sup>62</sup> The article reported in particular that in August 1996, three months after the DNC fundraiser, Gandhi appeared in small claims court in Contra Costa, California, in connection with a suit filed by former employees of the foundation seeking back wages and testified under oath that he had no American bank accounts or other assets, lived overseas the majority of his time, and obtained "all of his funds from a family trust in India."<sup>63</sup>

Following publication of these articles, DNC General Counsel Sandler made efforts to obtain a copy of the transcript of the court proceedings in which Gandhi allegedly stated that he lacked assets. On October 25, Sandler instructed DNC staff to prepare a return check to Gandhi. Sandler testified at his deposition that he decided to wait, however, until he had received and reviewed the court transcript before returning the funds. According to Sandler, after he received and reviewed the transcript, and after Gandhi failed to produce additional information regarding his contribution, Sandler ordered the return of the contribution. The return was made on November 6, 1996, about two weeks after the press allegations surfaced.<sup>64</sup>

During an interview with Committee staff about these events,<sup>65</sup> Gandhi made contradictory statements and also contradicted information he was identified as having provided to the media. For example, he told the staff that the funds for his contribution had come from a wire transfer from a personal friend after the event. He also stated that he had asked the DNC to hold his check until he had made sure that the funds were available. Upon further questioning, he seemed to retract those statements and indicated that he had received a series of wire transfers for \$500,000 around the time of the event. When asked about statements in press accounts that his funds had come from a joint venture which had become profitable,<sup>66</sup> Gandhi characterized those funds as an "advance" on a business deal which had fallen through due to adverse publicity surrounding his DNC contribution.

The Committee subsequently subpoenaed Gandhi's bank account records. The bank records show that, in May 1996, the same month as the DNC fundraiser, Gandhi received two wire transfers of \$500,000 and \$250,000 through Citibank in New York, from Japanese businessman Yoshio Tanaka. Absent these transfers, Gandhi's account did not have sufficient funds to cover the \$325,000 check to the DNC. Tanaka was one of Gandhi's guests at the fundraiser. Given Tanaka's past history of making regular wire transfers of similar sums to Gandhi, presumably in connection with Gandhi and Fukunaga's appearance with international figures, it is a logical inference that these wire transfers were intended to repay Gandhi for obtaining the tickets to the fundraising event at which President Clinton was present.

No evidence before the Committee indicates that anyone from the DNC, with the possible exception of Huang, had any knowledge that the Gandhi contribution was financed by another person and possibly utilized foreign funds. After press accounts questioned Gandhi's financial viability, the DNC obtained the relevant court transcript and returned his money in full.<sup>67</sup> On the other hand, the evidence indicates that, prior to accepting Gandhi's contribution initially, DNC personnel failed to obtain apparently readily available information raising concerns about Gandhi and his foundation, and never determined that the White House had prior dealings with him. Given the size of this contribution and how little was known about Gandhi, a more careful evaluation of his contribution should have been conducted. For additional discussion of this topic see Chapters 4 and 5 of this Minority Report.

### **HSI LAI TEMPLE MONASTICS**

The Hsi Lai Temple in Hacienda Heights, California, is the largest U.S. branch of the Fokuangshan Buddhist Order, a Taiwan-based Buddhist sect founded and led by the Venerable Master Hsing Yun ("Master" or "Hsing Yun"). According to its literature, the Hsi Lai Temple is the largest Buddhist monastery in the Western Hemisphere. It was built in 1988 to further "humanistic Buddhism" and to serve "as a spiritual and cultural center for those interested in learning more about Buddhism and Chinese culture."<sup>68</sup> During the 1996 election cycle, the Temple abbess was Suh Jen Wu; her assistant was Man-Ho Shih; and the Temple bookkeeper was Yi Chu.

On April 29, 1996, Vice President Gore attended a DNC-sponsored event at the Temple.<sup>69</sup> This event had been organized by Maria Hsia, a long-time Democratic activist and fundraiser, and a devotee of the Hsi Lai Temple.<sup>70</sup> John Huang was the DNC fundraiser in charge of organizing the event. DNC records attributed a total of \$159,000 in contributions to this event,<sup>71</sup> of which \$65,000 was contributed in the form of personal checks by monastics from or devotees associated with the Temple.<sup>72</sup> Each of the monastics who contributed to the DNC in connection with this event received a check from the Temple for the full amount of his or her contribution.<sup>73</sup>

On September 4, 1997, pursuant to a grant of immunity from criminal prosecution, the Committee received testimony concerning the event from three monastics, the Venerable Man-Ho Shih, assistant to the Temple Abbess; Venerable Yi Chu, the Temple bookkeeper; and Venerable

Man Ya Shih, abbess of a Texas temple who attended the event while visiting the Hsi Lai Temple for a seminar with the Master.<sup>74</sup> Man-Ho testified that \$45,000 in contributions was raised prior to the date of the event as a result of calls placed by monastics to devotees of the Temple.<sup>75</sup> She further testified that on the day after the event she received a telephone call from Maria Hsia informing her that John Huang needed to raise additional money in connection with the event to enable him to report total contributions of \$100,000.<sup>76</sup> Because she believed the Temple's abbess was already aware of this need, Man-Ho spoke with the Temple's bookkeeper, Yi Chu, about raising the additional funds.<sup>77</sup>

Yi Chu testified that she approached a number of monastics at the Temple that day and asked those who had their checkbooks if they would be willing to donate \$5,000. She said that no one refused. She said that she ultimately received checks from 11 people totaling \$55,000.<sup>78</sup> These checks were made out to the DNC and were provided to John Huang.<sup>79</sup>

Yi Chu further testified that she wrote checks totaling \$10,000 to three individuals -- two monastics and one devotee -- who had made contributions prior to the event in order to reimburse them for their contributions. In addition, she stated that she wrote reimbursement checks to each of the 11 monastics who contributed after the event.<sup>80</sup> The Temple thus reimbursed a total of \$65,000 in contributions, all of which were hard money contributions. The reimbursements were all made from the Temple's general expense account.<sup>81</sup>

The evidence before the Committee on whether the Temple and its monastics knowingly participated in a conduit contribution scheme is mixed. Some monastics apparently were unaware that the \$5,000 checks they were asked to write were for campaign contributions; Yi Chu testified that the name of the Temple's security system is "DNC" which may have caused some confusion,<sup>82</sup> and Yi Chu herself did not know that the DNC was a political party.<sup>83</sup> Temple officials also contend that "reimbursement" is a misnomer for the transfer of funds. They explain that the Temple's lifestyle is a communal one in which members view themselves as members of one large family. Members often give to the Temple what is theirs and they receive from the Temple as they need it.<sup>84</sup> In such a lifestyle the line between what constitutes the personal property of the monastics and what constitutes the property of the Temple is not as clearly delineated as it is elsewhere in American society. This concept was explained in the joint opening statement of the monastics who testified before the Committee:

For instance, individual monastics often share what assets they personally have accumulated with the temple and consider the temple to be their home and provider. Often, monastics will bring and contribute to the temple funds which they have access to or that belong to them from their lay relationships (i.e., inheritances or cash savings accumulated prior to their joining the monastery). While monastics may contribute their own funds to the temple, at the same time funds for their living expenses or for some worthy cause will be provided by the temple. All this is part of the Buddhist tradition[al] custom of helping one another in time of need. Thus, as a consequence[], what Americans call "reimbursements" is simply the way by which the temple helps its monastics to meet living expenses

or to perform good deeds.<sup>85</sup>

The testimony indicated that the Temple regularly “reimbursed” monastics for a wide variety of expenses, including medical expenses, educational expenses, expenses incurred in visiting family, and charitable donations.<sup>86</sup> Moreover, in an interview with Committee staff, Master Hsing Yun indicated that, in his view, contributions made in connection with a visit to the Temple by the Vice President of the United States were not an effort to promote the reelection of a particular candidate, but rather were a way of expressing gratitude to the United States for all the assistance it has provided to Taiwan over the years.<sup>87</sup>

On the other hand, the evidence indicates that at least some Temple officials were conscious of possible wrongdoing. Yi Chu, the Temple bookkeeper, testified that she knew the Temple could not contribute directly, in its own name, which is why she had to go through the process of finding individuals to write checks.<sup>88</sup> She and Man-Ho testified that once the controversy over the event became public, they destroyed certain documents and altered others. Among the documents Man-Ho destroyed was a list of those individuals who had contributed money prior to the Temple event.<sup>89</sup> The alteration of documents involved Yi Chu’s adding the words “futien account” to the bottom of the reimbursement checks supplied by the Temple, after those checks had already been cashed.<sup>90</sup> This alteration was significant, because the checks were drawn on the Temple’s general expense account,<sup>91</sup> not the special account used by the Temple to manage its monastics’ personal funds or “futien accounts.” If the monastics had been reimbursed from their futien or personal accounts, it would have been clear that the money they were contributing was their own. By adding the words “futien account” to the reimbursement checks after the fact -- suggesting that the reimbursements were made with each monastic's personal funds rather than with the Temple's funds -- Yi Chu seemed to demonstrate an understanding that using the Temple’s funds was improper.

Yi Chu's explanation for her action was that she was concerned about the press reports concerning the Temple event and was worried that negative publicity would hurt the Temple’s reputation.<sup>92</sup> She stated that she did not want to embarrass the Vice President or her friend Maria Hsia.<sup>93</sup> She and Man-Ho each testified that they took their respective actions entirely on their own and were not instructed to do so by Maria Hsia, John Huang, or anyone else.

Yi Chu and Man-Ho have also indicated that the April 1996 event was not the only time that the Temple had asked its monastics to make campaign contributions. Man-Ho stated in her deposition that the practice dated back to at least 1993, when Hsia asked her whether any of the Temple's devotees would like to support a fundraiser at which Vice President Gore would be appearing.<sup>94</sup> She indicated that three Temple devotees contributed a total of \$5,000 in connection with that event, for which the Temple reimbursed them. In 1996, the Temple asked its supporters to make contributions not only at the April event, but also for DNC fundraisers in Washington and Los Angeles,<sup>95</sup> a fundraiser for Representative Patrick Kennedy of Rhode Island,<sup>96</sup> and for an event featuring Hillary Rodham Clinton. She indicated that, in each case, Hsia requested these contributions, and in each case the Temple reimbursed its supporters who made contributions.<sup>97</sup>

On February 18, 1998, the Department of Justice indicted Hsia for conspiring with the Temple, from 1993 to 1996, to reimburse persons associated with the Temple for making requested campaign contributions. Hsia denies the charges. The indictment does not allege any facts indicating that foreign money was involved in the contributions. The indictment also does not allege any facts indicating the DNC, White House or John Huang was aware of the conduit contributions.<sup>98</sup>

Section 441f states that "[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution." The evidence before the Committee suggests that the donations made by the Temple's monastics and devotees appear to have violated this prohibition, although many of the persons writing the checks apparently did not understand that they were making campaign contributions or that they were potentially violating federal election law. Nevertheless, the evidence suggests that there was little doubt that most, if not all of them, wrote checks only because the Temple asked them to do so and did so with an expectation of reimbursement similar to many other expenditures they might make. There is no evidence before the Committee that the Temple used any foreign funds to reimburse the contributions.<sup>99</sup> There is also no evidence before the Committee that Vice President Gore or any DNC official knew that the contributions made by persons associated with the Temple were of questionable legality. The DNC has returned all contributions made by persons associated with the Temple.

### **ARIEF AND SORAYA WIRIADINATA**

Arief and Soraya Wiriadinata were born in Indonesia, became legal permanent residents of the United States, and resided in the United States until December 1995.<sup>100</sup> Arief attended graduate school in the U.S. in architectural engineering and operated a landscape architecture business. He also was a joint owner of a computer business named Geo-Tech in Indonesia, a business which he had hoped to develop in the United States. Arief's wife, Soraya, is the daughter of Hashim Ning, a wealthy Indonesian businessman who was a friend and business partner of Mochtar Riady.<sup>101</sup>

Arief and Soraya Wiriadinata voluntarily consented to be interviewed by Committee staff. Their interview took place on June 24, 1997.

In the interview, Arief stated that he and his wife made all of their campaign contributions through John Huang whom they first met when Huang visited Soraya's father in the hospital during the summer of 1995.<sup>102</sup> Arief indicated that Huang encouraged the Wiriadinatas to support the Democratic Party at that time, although it does not appear that Huang directly solicited a specific contribution. Arief stated in the interview that a few months later, in October of 1995, during a visit to Indonesia, he informed Ning that he intended to contribute money to the Democratic Party. He indicated that he thought these contributions would help him build relationships that would facilitate his business efforts in the United States.<sup>103</sup>

On November 2, 1995, the Wiriadinatas opened two bank accounts -- one in each of their names -- at First Union Bank. Three days later, Soraya's father wired \$250,000 from an account under his control to Soraya's account. Two days after that, he wired another \$250,000 to Arief's account. From November 1995 until December 1996, Soraya made 11 contributions from her account totaling \$226,000. During the same time period, Arief made ten contributions from his account totaling \$201,000. With the exception of \$2,000 contributed to the congressional campaign of Rep. Jesse Jackson, Jr. (D-Ill.), all of the Wiriadinatas's contributions were to the DNC and provided both hard and soft money.<sup>104</sup> Many of these contributions were made after the Wiriadinatas left the United States and returned to Indonesia in December 1995.

Soraya stated in her Committee staff interview that the \$500,000 wired to the two accounts was her own money.<sup>105</sup> She described it as her portion of the family's wealth, which her father, an experienced investor, had been managing for her. She also stated that following her father's death her brother took on the task of managing her money. According to an FBI detailee to the Committee who has worked and lived within Asian communities, such a practice is not unusual within Asian families.<sup>106</sup> No evidence has been presented to the Committee which contradicts Soraya's characterization of the money in the accounts as her personal funds. In addition, the Wiriadinatas voluntarily cooperated with the Committee investigation and have no history of wrongdoing. If the money wired to the accounts did, in fact, belong to Soraya, the Wiriadinatas' contributions would not appear to violate the prohibition against contributions in the name of another.

Moreover, as long as the Wiriadinatas were legal permanent residents, they were eligible to contribute and the prohibition against foreign contributions did not apply to them. Once the Wiriadinatas travelled to Indonesia, the law suggests they endangered their immigration status but it is unclear whether or at what point they may have lost their permanent resident status and eligibility to contribute. During their interview, the Wiriadinatas said that they travelled to Indonesia in December 1995 due to Ning's illness and remained at the request of her family after Ning's death, but had "always planned on returning to the United States after a year or two."<sup>107</sup> Under federal immigration law and its implementing regulations,<sup>108</sup> legal permanent residents who travel abroad may retain their legal permanent resident status so long as they "departed from the United States with the intention of returning" and the visit abroad was "temporary" or, if protracted, the length of time was due to "reasons beyond the alien's control and for which the alien was not responsible."<sup>109</sup> These determinations are to be made by immigration officials on a case-by-case basis when a person claiming permanent resident status seeks to return to the United States.<sup>110</sup> No specific period abroad automatically causes legal permanent residents to lose their immigration status, although after six months, immigration officials typically question individuals claiming to be returning legal permanent residents.<sup>111</sup> Despite the fact that it is unclear if and when the Wiriadinatas may have lost their permanent legal resident status, the DNC chose to return all of the funds they contributed.<sup>112</sup>

## **THE LUM FAMILY**

In May 1997, Nora and Gene Lum, and their daughter, Trisha, pleaded guilty to laundering contributions to Democratic campaigns in 1994 and 1995.<sup>113</sup> Nora and Gene Lum pleaded guilty to making \$50,000 in illegal conduit contributions, primarily through employees and board members of their Oklahoma-based company, Dynamic Energy Resources.<sup>114</sup> Trisha Lum pleaded guilty to making an illegal conduit contribution of \$10,000 to the Democratic Congressional Campaign Committee.<sup>115</sup> These contributions, which were primarily from the 1994 election cycle, demonstrate that contribution laundering is not a new practice in the 1996 election cycle.

Nora and Gene Lum are Asian Americans who, in 1992, moved from Hawaii to Los Angeles and launched the Asian Pacific American Advisory Council (“Council”), a group seeking to increase support for Democratic candidates among Asian Americans in Southern California.<sup>116</sup> In addition, the Lums personally contributed to Democratic candidates, with the bulk of their contributions directed to the 1994 re-election campaign of Senator Edward Kennedy of Massachusetts, and an unsuccessful bid for an Oklahoma congressional seat made by their business partner and co-owner of Dynamic Energy, Stuart Price.

Beginning in 1994 and continuing for about a year, the Lums began to use their personal funds and funds from Dynamic Energy to make conduit contributions.<sup>117</sup> Between May 1994 and April 1995, the Lums funneled approximately \$50,000 in conduit contributions into several Democratic campaigns, primarily through company employees. Their daughter Trisha served as a conduit for a \$10,000 donation to the Democratic Congressional Campaign Committee, a division of the DNC, financed with funds from her mother. In August 1997, Michael Brown, son of the late Secretary of Commerce Ron Brown, a friend of the Lums, and acting president of Dynamic Energy, pleaded guilty to participating in the Lums’ conduit scheme.<sup>118</sup> After initially donating \$1,000 to the 1994 reelection campaign of Senator Kennedy, Brown admitted receiving another \$5,000 from Nora Lum. Brown then used those funds to make another \$1,000 contribution to the Kennedy campaign in his own name (reaching the \$2,000 legal limit on individual contributions), and used the remaining \$4,000 to reimburse others who made contributions under their names.<sup>119</sup>

The Justice Department obtained the convictions of the Lum family and Michael Brown in 1997.<sup>120</sup> To date, the Justice Department has apparently found no evidence that the DNC, Senator Kennedy, Stuart Price, or any other candidate or campaign organization was aware of the Lums’ conduit scheme or knowingly accepted a laundered contribution. The evidence indicates that as soon as the allegations against the Lums became known, Democratic party officials and the Kennedy and Price campaigns returned all relevant contributions.<sup>121</sup>

## **CONCLUSION**

The evidence before the Committee confirms that the DNC received a number of contributions during the 1996 election cycle that were paid for by someone other than the contributor of record, and that at least of some of these contributions may have utilized foreign

funds. The evidence did not establish that the DNC knew or should have known of this misconduct. The example of the Lums shows that conduit contributions were not a new practice in the 1996 election cycle.



## NOTES

1. For more information on Trie and Wu, see Chapter 5: Charlie Trie, *supra*.
2. See Exhibit 62: DNC In-Depth Contribution Review, DNC 0134-145.
3. See Washington Post, 12/18/96.
4. Jerry Campane, 7/29/97 Hrg., pp. 71-72.
5. Hrg., 7/29/97, p. 150.
6. Hrg., 7/29/97, pp. 126-127, 140-141.
7. Hrg., 7/29/97, pp. 127-128.
8. Hrg., 7/29/97, pp. 125-126.
9. Hrg., 7/29/97, p. 128; Yue Chu deposition, 7/9/97, pp. 18-19.
10. Hrg., 7/29/97, pp. 130-133.
11. Hrg., 7/29/97, pp. 134-135; Xiping Wang deposition, 7/9/97, pp. 10-16.
12. Hrg., 7/29/97, pp. 134-135; Xiping Wang deposition, 7/9/97, pp. 10-16.
13. Yue Chu deposition, 7/9/97, pp. 36-37; Hrg., 7/29/97, p. 137.
14. Hrg., 7/29/97, pp. 137-140.
15. Hrg., 7/29/97, pp. 138-140, 143. See Exhibit 211: \$12,500 check from Keshi Zhan to Ming Chen, 2/19/97; Exhibit 212: \$7,500 check from Keshi Zhan to Ming Chen, 2/19/97.
16. Hrg., 7/29/97, pp. 129-130.
17. United States v. Yah Lin “Charlie” Trie and Yuan Pei “Antonio” Pan, Criminal Case No. 98-0029 (U.S. District Court for the District of Columbia), 1/28/98 (hereinafter referred to as the “Trie indictment”), “Manner and Means of the Conspiracy,” paragraph 15 (c), (d), (i).
18. Trie indictment, “Overt Acts,” paragraph 34.
19. Jerry Campane, 7/29/97 Hrg., pp. 64-65, 93.
20. Jerry Campane, 7/29/97 Hrg., p. 93.
21. Trie indictment, “The Conspiracy,” paragraph 14.

22. See Part 1, Chapter 5: Charlie Trie, for more information.
23. Trie indictment, "Overt Acts," paragraphs 43-45, 52.
24. Trie indictment, "Overt Acts," paragraphs 48-51. See also Los Angeles Times, 12/7/97.
25. Washington Post, 7/13/97.
26. Washington Post, 1/27/97; Clark Wallace deposition, 8/27/97, pp. 92-93.
27. Clark Wallace deposition, 8/27/97, pp. 6-14.
28. Jackson served in the Bush Administration as the National Security Council's chief Asian expert. In 1992, he became Vice President Quayle's national security adviser. In August 1993, Jackson and Quayle announced formation of FX Strategic Advisors, Inc., a consultancy service for foreign-exchange traders and U.S. companies looking to invest abroad. See Los Angeles Times, 10/10/94; Financial Times, 9/6/93; Business Times, 6/28/94. Jackson testified before the Committee on 9/16/97.
29. See FEC records and [www.tray.com/cgi-win/allindiv.exe](http://www.tray.com/cgi-win/allindiv.exe).
30. UST 2013.
31. EOP002958; EOP002959.
32. Richard Sullivan deposition, 6/4/97, pp. 125-127.
33. Memorandum dated 11/20/96, by Ari Swiller, head of the DNC's managing trustee program, DNC1143379.
34. Ibid.
35. Ibid.
36. DNC Check Tracking Form, 5/28/96, DNC0829404
37. See Los Angeles Times, 10/23/96.
38. See Los Angeles Times, 10/23/96.
39. Los Angeles Times, 11/2/96 and 10/23/96; EOP 005431.
40. Los Angeles Times, 11/2/96.
41. Los Angeles Times, 11/2/96.
42. EOP 003666 and 003667.

43. EOP 003344.
44. EOP 003345.
45. EOP 005431.
46. EOP 005430.
47. EOP 008846.
48. Eder deposition, 5/28/97, pp. 200-205.
49. EOP 4717, October 14, 1987 UPI article.
50. EOP 003399.
51. Staff interview with of Yogesh Gandhi, 3/24/97. Gandhi had originally agreed to provide a deposition, but at the beginning of the deposition asserted his constitutional rights under the Fifth Amendment and refused to provide sworn testimony. He consented to an unsworn, untranscribed interview.
52. L.A. Times 11/2/96.
53. See FEC filings.
54. Staff interview with Yogesh Gandhi, 3/24/97.
55. Joe Sandler deposition, 5/15/97, p. 110.
56. Los Angeles Times, 11/2/96.
57. Joseph Sandler deposition, 5/15/97, pp. 107-11.
58. Staff interview with Yogesh Gandhi, 3/24/97.
59. Richard Sullivan deposition, 6/5/97, pp. 34-35.
60. Joseph Sandler, 9/10/97 Hrg., p. 13.
61. Staff interview with Yogesh Gandhi, 3/24/97.
62. Los Angeles Times, 10/23/96.
63. Los Angeles Times, 10/23/96.
64. Joe Sandler deposition, 5/15/97, pp. 113-116.

65. Staff interview with Yogesh Gandhi, 3/24/97.
66. See Los Angeles Times, 10/23/96.
67. Because the \$325,000 contribution was attributed entirely to a soft money account, section 441f's prohibition on contributions in the name of another may not apply. See Chapter 20: Overview and Legal Analysis.
68. Hsi Lai Temple Literature, 000860-000865, 861.
69. For a discussion of the event itself and the Vice President's role in it, see Part 1's chapter on John Huang, supra.
70. See Howard Hom deposition, 8/27/97.
71. DNC document # D 0000974-977.
72. Yi Chu, 9/4/97 Hrg., p. 74.
73. Yi Chu, 9/4/97 Hrg., p. 44.
74. Man Ya Shih deposition, 8/20/97, pp. 13-14, 28-29.
75. Man-Ho Shih, 9/4/97 Hrg., p. 31.
76. Man-Ho Shih, 9/4/97 Hrg., p. 41.
77. Man-Ho Shih, 9/4/97 Hrg., pp. 41-42.
78. Buddhist nuns, 9/4/97 Hrg., pp.43-45, 160-163.
79. Yi Chu, 9/4/97 Hrg., pp. 46-48.
80. Yi Chu, 9/4/97 Hrg., p. 44.
81. Yi Chu, 9/4/97 Hrg., p. 47.
82. Yi Chu deposition, 8/7/97, p. 78.
83. Yi Chu deposition, 8/7/97, p. 77.
84. Monastics of the Fokuangshan Order do not take a vow of poverty. Although many monastics do turn their wealth over to the sect, they are not required to do so. Monastics generally receive a monthly allowance from their Temple based upon their seniority and responsibilities. Indeed, monastics are allowed to maintain personal checking accounts at commercial banks. Some also maintain futien accounts with their individual temple. Such futien

accounts are managed by the Temple on behalf of the monastic. The money from these futien accounts is typically held in a common account owned by the Temple. Buddhist nuns, 9/4/97 Hrg., pp. 45, 49-51.

85. Buddhist nuns opening statement, 9/4/97 Hrg., p. 195.

86. Man-Ho Shih, 9/4/97 Hrg., pp. 56-57.

87. Statement of the Venerable Master Hsing Yun presented during his interview with Committee investigators, 6/17/97.

88. Yi Chu deposition, 8/7/97, p. 31.

89. Man-Ho Shih, 9/4/97 Hrg., pp. 34-35.

90. Yi Chu, 9/4/97 Hrg., p. 64.

91. Yi Chu, 9/4/97 Hrg., pp. 47, 74.

92. Yi Chu, 9/4/97 Hrg., p.65; Man-Ho Shih deposition, 8/6/97, pp. 155-58; Exhibit 706.

93. Yi Chu, 9/4/97 Hrg., p. 65.

94. Man-Ho Shih deposition, 8/6/97, pp. 74-84.

95. Man-Ho Shih deposition, 8/6/97, pp. 196, 202.

96. Man-Ho Shih deposition, 8/6/97, p. 206.

97. Man-Ho Shih deposition, 8/6/97, pp. 206-213.

98. U.S. v. Maria Hsia, (Criminal Case No.\_\_\_\_, D.D.C. 12/18/95).

99. Yi Chu, 9/4/97 Hrg., pp. 52 (Glenn), 99, (Lieberman), 107 (Durbin), 163 (Nickles).

100. Staff interview of Wiriadinatas, 6/24/97.

101. Staff interview of Wiriadinatas, 6/24/97.

102. Staff interview of Wiriadinatas, 6/24/97.

103. Staff interview of Wiriadinatas, 6/24/97.

104. Staff interview of Wiriadinatas, 6/24/97.

105. Staff interview of Wiriadinatas, 6/24/97.

106. Staff interview of Wiriadinatas, 6/24/97.
107. Staff interview of Wiriadinatas, 6/24/97.
108. 8 USC 1104; 22 CFR 42.22.
109. 22 CFR 42.22(a).
110. 22 C.F.R. 42.22(a).
111. See 8 USC 1101(a)(13)(C).
112. See FEC filings.
113. United States v. Nora and Gene Lum, Criminal Case No. 97-0207 (D.D.C.), 5/16/97; United States v. Trisha Lum, Criminal Case No. 97-0208 (D.D.C.), 5/9/97.
114. United States v. Nora and Gene Lum, Criminal Case No. 97-0207 (D.D.C.), 5/16/97; United States v. Trisha Lum, Criminal Case No. 97-0208 (D.D.C.), 5/9/97; see also Los Angeles Times, 6/30/97.
115. United States v. Nora and Gene Lum, Criminal Case No. 97-0207 (D.D.C.), 5/16/97; United States v. Trisha Lum, Criminal Case No. 97-0208 (D.D.C.), 5/9/97; see also Los Angeles Times, 6/30/97; Los Angeles Times, 5/22/97.
116. See Los Angeles Times, 6/05/97; and see also Chicago Tribune, 12/16/97.
117. See Los Angeles Times, 5/22/97.
118. United States v. Michael A. Brown, Plea Agreement, (D.D.C.), 8/26/97.
119. United States v. Michael A. Brown, Plea Agreement, (D.D.C.), 8/26/97; see also Washington Post, 8/29/97.
120. United States v. Nora and Gene Lum, Criminal Case No. 97-0207 (D.D.C.), 5/16/97; United States v. Trisha Lum, Criminal Case No. 97-0208 (D.D.C.), 5/9/97; see also Washington Post, 2/7/96.
121. See FEC filings. See also Los Angeles Times, 6/5/97.