Complainant   Protect Source
Complaint received    Personal   Telephonic Date 3/15/98   Time     Complainant's address and telephone number     Complainant's DOB   Not given   Male     Race   Mhite   Mhite   Mhite   Mite   Mite   Male     Age   Female   Weight   Eyes   Complexion   Social Security Number
Personal   Telephonic Date 3/15/98   Time
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Personal   Telephonic Date 3/15/98   Time
Complainant's address and telephone number    Complainant's DOB
Complainant's DOB not given    Race   White   White   Height   Hair   Build   Birth date and birth place   White   Female   Weight   Eyes   Complexion   Social Security Number
Race White Summary by writer, it points with date and birth place which given Social Security Number    Not given   Build   Birth date and birth place   Social Security Number
Race White Season Weight Hair Build Birth date and birth place    Male   Female   Weight   Eyes   Complexion   Social Security Number
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interviewing agent. The written summary provided itself is not detailed enough to make a determination of any sort.

has stated that he is willing to testify in any matter in which his testimony may be needed. The attached information is provided to the appropriate squad for their review and assessment.

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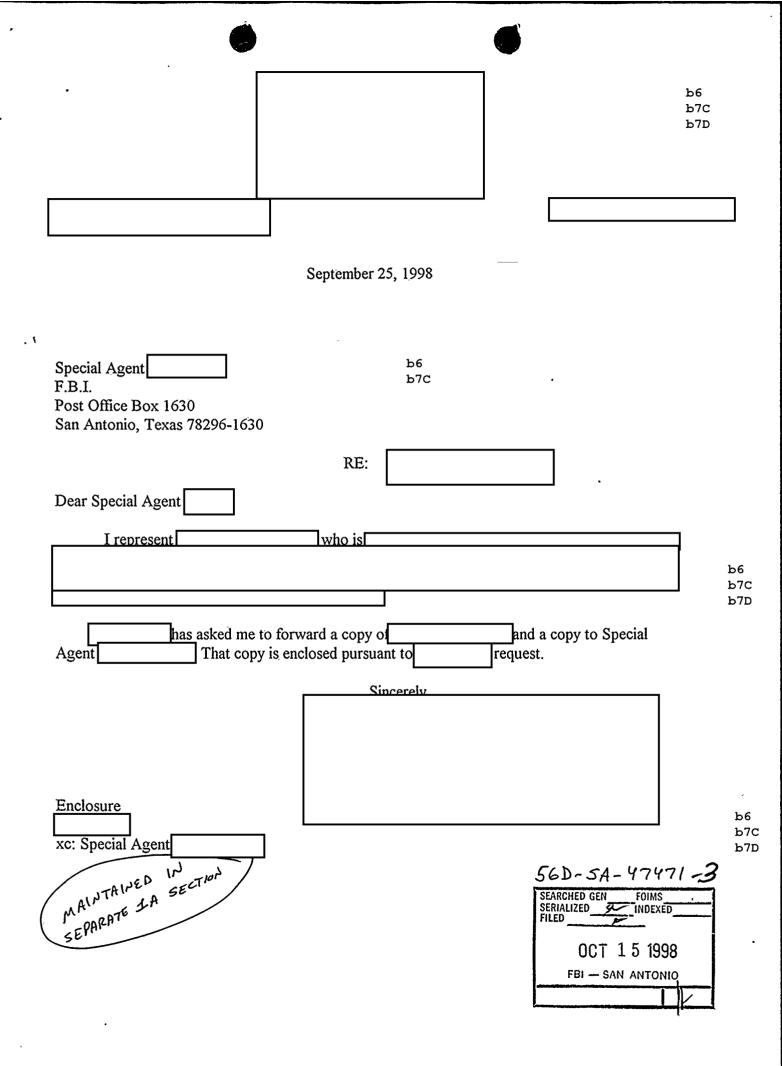
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# REVIEW & OUTLOOM

# **BCCI: The Mystery Lingers**

Forget the old brain teaser about a tree falling in a forest not making any noise unless there's someone around to hear it. We know that the world's largest bank fraud can go almost unnoticed, except to Manhattan District Attorney Robert Morgenthau. We refer, in case you've forgotten, to the Bank of Credit & Commerce International, which was back in the news in two jurisdictions last week.

In Washington, Clark Clifford and Robert Altman agreed to give up \$18.5 million in claims on stock and legal fees connected with First American Bankshares, the BCCI front they once headed in the nation's capital. In Luxembourg, BCCI auditors Price Waterhouse and Ernst & Young agreed to a payment of \$125 million to the defunct bank's customers; the creditors will now recover more than half their money-more than quadruple the best estimates at the time BCCI went under.

These people, many of them Pakistani nationals in Britain, will be mighty glad that Mr. Morgenthau pursued the case when the Bank of England, the Justice Department and varlous others ducked. Yet for all the smoke Mr. Morgenthau uncovered we have only glimmers of the fire that led to it all. There are still unresolved

questions about the political patronage that 'has helped shield BCCI principals from a full reckoning, and in particular about how a crooked Pakistani-Arab bank got control of the largest bank in Washington, D.C.



In this respect, Robert Morgenthau the Altman-Clifford settlement is particularly striking. At issue has always been whether the two knew that BCCI was the real owner of First American, of which they were, respectively, president and chairman. Mr. Altman beat criminal charges of fraud and lying to banking regulators; Mr. Clifford was not charged because of his age and health. When the Federal Reserve Board settled civil fraud charges back in February, the two claimed that the central charges against them were "wholly untrue" and that the "remaining issues would have been resolved in their favor" had they gone to court. Maybe. But their checkbook said otherwise. In the Fed settlement, the two forked over \$5 million in stock to compensate BCCI creditors. And last week they agreed to drop all claims to \$18.5 million in stock and legal fees, in return for an end to remaining legal action against them.

Yet the essential mystery remains. Doubtless that's just the way many. would like to leave it, because the names that pop up read like some kind of Who's Who. There is, to begin with, a large Arkansas connection, since Little Rock investment giant Stephens Inc. assembled the bloc of First American stock for the BCCI front men. Assisting in these transactions was the now-famous Rose Law Firm, then headed by Joseph Giroir, more lately a representative of the Riady family of Indonesia and participant in the notorious September 13, 1995, Oval Office

meeting at which John Huang was dispatched to his fund-raising tasks.

Rose Attorney Hillary Rodham represented a Stephens subsidiary, the Systematics bank-data processing firm, in a related lawsuit. James Riady made his first appearance in Little Rock about the time these transactions took place, with his family ending up with a piece of the Stephensdominated Worthen Bank. Another player was Bert Lance, Jimmy Carter's disgraced head of Office of Management and Budget, who apparently hoped to head First American himself. All of these people deny that they knew anything crooked was taking place, just a group of smart, well-connected Friends of Bill stunningly ignorant about the people they were doing business with.

Yet since the mystery has never been cleared up, you can't blame those of us who followed it from remembering names as they turn up in today's news. Nicholas Katzenbach, for instance; the former Attorney General surfaced last week with two of Mr. Clinton's serial White House counsels, defending the President against impeachment in a New York Times op-ed. We remember that Mr. Katzenbach replaced Mr. Clifford when the latter resigned from First American in 1991.

Ditto for John E. "Jack" Ryan, who ended up as head of the Resolution Trust Company and denied Rep. Jim Leach's request for documents relating to Madison Guaranty Trust, the Whitewater S&L. We remember that it was under Mr. Ryan's watch as head of bank supervision at the Fed that BCCI won approval to buy First American.

For those who worry that a BCCI investigation might be too partisan, we also remember that it was Senator Orrin Hatch who delivered a floor speech praising BCCI for agreeing to a settlement when Tampa prosecutors first found evidence of the bank's involvement in drug running. As head of the Judiciary Committee, of course, Mr. Hatch, would play a key role if an impeachment ever reached the Senate.

Finally, what do we make of the report that the National Commercial Bank of Saudi Arabia has close links with the owner of the suspect pharmaceutical plant bombed in the controversial raid on Sudan. We remember that the bank was run by Khalid bin Mahfouz, one of the BCCI front men in their purchase of First American.

Seven years after BCCI was shut down, the culpability (if any) of all these people remains unclear and unlikely ever to be resolved. What we do know, as Senator Kerry's 1992 report to the Foreign Relations Committee states, is that BCCI was not a good bank that went bad; from the beginning its criminality "was inherent in the bank's philosophy." And that a key component of BCCI's U.S. strategy was the "aggressive use of a series of prominent Americans" to lend "their names and their reputations to BCCI at critical moments." But of course none of these people understood the bank's nature; to believe that defense we must believe that the savviest, most well-connected players in Washington never understood what was going on before their eyes.

(01/26/1998)

## FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 10/07/1998
To: Criminal Investigative Attn: Public Corruption Unit
From: San Antonio Squad 8 Contact: SA tel.
Approved By
Drafted By
Case ID #: 56D-SA-47471
Title: Jackson T. Stephens, Jr., aka Steve Stephens; Election Laws
Synopsis: The purpose of this ec is to provide the Public Corruption Unit with information obtained during the course of investigating the captioned matter.
Enclosures: Enclosed for FBIHQ, Public Corruption Unit, is an FD-302 reflecting the results of an interview with
Details: For information of FBIHQ, Public Corruption Unit, San Antonio Division received information that had evidence of violations of election laws.
As indicated on the attached FD-302 would not provide any detailed, specific information to the interviewing Agents.
agreed to contact his attorney, to receive advice as to how to provide the information he has.
Note that
Chief of the Criminal Division of the United States Attorney's Office in San Antonio, Texas, the matter has been referred to the Department of Justice's Office of Professional Responsibility.

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Criminal Investigative From: San Antonio 56D-SA-47471, 10/07/1998 To:

Re:

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San Antonio lacks venue in this matter and is closing its case at this time.

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SAC, San Antonio and SAC, Houston concur with travel.

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