AFFIDAVIT OF

LORI HANSEN RIEGLE

Lori Hansen Riegle, being first duly sworn, deposes and states as follows.

I am Senator Riegle's wife, and I had direct involvement in several matters under review by the Committee. I wish to provide my first hand knowledge in those areas.

1. On or about January 28, 1987, Kevin Goulieb called me at home to say that in a meeting with Don and Kevin, Mr. Keating had offered to host a fundraiser for Senator Riegle in Michigan at the Pontchartrain Hotel, which was owned by Mr. Keating. Kevin was calling to ask me to give them possible dates for the fundraiser which could be suggested to Keating.

2. As was our customary practice, Kevin had asked Mr. Keating how much lead time would be needed to set up the event and what day of the week was preferred. Kevin's notes from the meeting with Mr. Keating

1

States and the

Riegle Exhibit 3

(R000049) reflect this information. Kevin asked me to let Jo Vincent know what dates I selected.

3. As the person responsible for coordinating all of my husband's out-of-DC commitments, I was the only person who had the authority to release dates for scheduling fundraising and other kinds of trips. After assessing Don's other travel commitments and Senate responsibilities, and taking into account the lead time and day of week requested by the host of the fundraiser, I determined two possible dates. - March 2 & 23. Both were Mondays when we were assured of no Senate votes.

4. I then phoned Jo Vincent either on Jan 28 or 29th to release March 2 & 23rd as the dates she could offer to Keating's office. These are the dates written on Jo's note (see R00014). Jo apparently called Keating's office with the dates, and Carol from Keating's office called back on January 30 to say they had selected March 23rd as the date (see R00014). Jo then called me to advise me of this so I would lock in the event for the 23rd and no longer hold the 2nd. There was no "FUNDRAISER REQUEST" form filled out for the Keating fundraiser because we were not yet using that form.

5. In selecting the two dates offered to the Keating people for this event, I made my decision solely on the basis of what worked best for Don's schedule. This was all I ever considered for any fundraising date and this one was no different. No one made any suggestion to me about when the fundraiser should occur or that there was any reason to do it on any particular date. The selection of the date was solely mine. I had kept as many Mondays free of commitments as possible to use for fundraising, because the Majority Leader had indicated there would be no votes on Mondays - for at least the first three months of 1987.

6. On or shortly after 11/17/86, Don and I received in a scheduling packet a scheduling request for Don to speak to the New England Leadership Forum on March 8 & 9, 1987 in Phoenix. Don agreed and I noted the decision on the form on 11/22/86. This event was the reason Don was scheduled to go to Phoenix. Since we knew we wanted to try to raise campaign money in Arizona, we decided we would attempt to do fundraising on this trip as well.

7. I set aside 4 days for the Arizona trip -- March 6, 7, 8 & 9, which

anticipated two stops, one in Tucson and the other in Phoenix. The 6th & 7th were for travel and fundraising, the 8th for rest, and the 9th for the New England activity and return travel. When it became clear that the Tucson fundraising leg was not going to come together, I reduced the Arizona trip to March 7, 8 & 9th.

8. With the exception of the New England Life events, Earl Katz was the Arizona person who helped with the Phoenix events. We had no knowledge of his business connections to Keating, but knew him as Senator DeConcini's chief fundraiser, a person with a University of Michigan background who had helped us with our 1982 campaign and the person who could help raise campaign contributions for 1988. Mr. Katz proposed a stop at ACC to Kevin. I did not find it an unusual request given that the purpose for the visit was to view the ACC properties that related to ACC's development plans in Detroit.

9. The draft schedule dated March 6,7,8 & 9th (see R000029) was never seen by Don. Draft schedules are prepared for me. I review them and have authority to make changes I believe necessary. I doubt whether this draft was ever circulated, as my decision for Don to depart on the 7th

rather than the 6th was not a last minute decision. I believe this was a very preliminary draft. The only schedule Don worked from was the final schedule, and he would have first looked at it on March 7, 1987 when he was on the plane to Phoenix.

10. From Kevin's first phone call to me requesting a date for the fundraiser, Don and I clearly viewed this as a Michigan fundraising event. I knew from Jo that we were giving Keating our \$500+ contributors list to be invited to the event, and we understood that Keating would try to bring in new Michigan contributors.

11. It was not until February 28, 1988, that Don and I first learned that the Pontchartrain event had actually raised some \$78,000 from Keating and his associates. I was with Don at a hotel in Detroit on Sunday, 2/28/88, when he was reading the <u>Detroit News</u> and found an article about the Keating contributions. We did not believe the story could be accurate in stating that Keating and his associates had contributed some \$66,000 to the Riegle campaign. We initially thought the reporter had simply taken any contributor that might at anytime have done business with Keating's company and counted those as Keating related contributions. We just

didn't believe the story was right. Don called Kevin to have the campaign records checked to see what the facts were.

12. When Kevin later indicated that after checking, many contributions did appear to have Keating business connections, I remember Don being very angry that it had never been brought to his attention. Although the contributions were legal and had been fully reported, he felt very uncomfortable about this heavy concentration of contributions, because the event was designed to principally solicit our Michigan contributor base.Don said he didn't want there to be any possibility of an appearance problem related to the Keating contributions, and he decided that all such contributions were to be returned.

13. Each evening I receive a copy of Don's daily office schedule for the next day. I remember very clearly that the April 9, 1987, meeting did not appear on his schedule card. As is our custom, Don called me in the late afternoon of the 9th to make our evening plans. I remember him telling me that the Senate was going to remain in session that evening and Senator DeConcini had asked him to attend a meeting in his office. I remember this because we had been at an event the night before, and he

had two successive early morning commitments. This meant that he had not seen our 2 year old daughter awake in over 2 days.

14. The Keating New York fundraiser request came home to us in our normal process for scheduling. We always tried to do a quick turnaround on all fundraiser event requests. The form is dated 2/22/88 and I'm certain we dealt with it prior to our departure for Michigan on 2/27/88. I remember very clearly that Don looked at the form during our scheduling session and said "No", he didn't want Keating sponsoring another fundraiser for us. The form is not marked, I believe, because Don took it to tell Kevin or Jo he was saying no to the fundraiser and they would have to handle the response. It is not unusual that this form would not have the response checked. Sometimes Don takes scheduling forms with him to discuss with staff some aspect or to explain his decision and how the response is to be handled. This happens most often when we are rushed and have lots of other scheduling items to discuss. In 1988, our election year, every aspect of our lives was rushed.

15. I believe Jo Vincent may have called me to inquire about the status of the request after Don and I had considered it. I have a recollection of

7

÷.

telling her Don had said no, but that he had taken the form to tell Kevin or Jo to handle the response. I believe she was surprised Don would say no to a fundraiser with a monetary goal that high. I told her that the decision was firm, and there was no more discussion about it. Don's decision was made just a few days prior to our learning through the <u>Detroit News</u> that Keating and his associates had made contributions of \$78,000 to the Riegle campaign.

16. I am attaching two documents to my affidavit. The first is a memo dated December 15, 1986, addressed to me and to Don. The memo is entitled, "Fundraising Events to be Scheduled". I helped to collect the information which is contained in this memo. Our purpose was to identify all potential sponsors of fundraising events for Don's campaign. As of the date this memo was put together, I had never heard of Mr. Keating as a potential contributor or sponsor, and his name was not included in the memo.

17. On December 22, 1986, I hand wrote a memo to Don, Kevin Gottlieb and Jim Arbury. The memo is entitled "Strategy Mtg - Scheduling Commitments" and states at the beginning: "Following is a listing of

scheduling commitments in 1987 that have been made for DWR as of this date." The memo identifies every fundraiser which was then scheduled for the first five months of 1987. When I wrote the memo I obviously had not heard anything about a Keating fundraiser in the month of March 1987, or in any other month.

Ani Hansen Bugle

4

LORI HANSEN RIEGLE

. 23

1

Subscribed and Sworn to this <u>i24</u> day of November, 1990.

Ronaldo analord

Notary Public By Continent Fredret M / 0, 1052

MEMO 12-22-86 D: DWR, JA, KG FROM: LAR RE: Strategy Mtg - - Scheduling Commitments Following is a listing of the scheduling commitments into that name been made for DwR as of this date. There are 5 Michigan days, 6 fundrassing days, 5 out-of state the honorarium days, and 9 personal days scheduled during the reft 5 months. Purpose Event Tannary Bra Rator, F2. / Harry Tocats 16 California / Hollywood Women's Carona FR 17 Legura Rige, CA / Honorarium HO 19 DC / J.D. Williams FR * 22 February FR+* NY/J. Robinson Я Detroit / Mich. Dens. Conv. M 14+15 HI Grand Rapits / Econ. Club 16 μĽ Bay Co. / Dems dinner 27 NS Bay/Saginaw / Work day 28 i sel FR * Detroit / Butteday party 3 FR * Procence / 6

Phoenix / 7 FR+ Phanix / day off Phanix 8 9 HÒ Brever Crack, Conato / Auhenst 12-15 Ю April 11-19 Do Not Scheduce PS Detroit INAACP ??? 19. May 2 Derroit / Jeff. Jack ME In addition, Kivin has been given the following dates for functioning purposes. These are all shell pending as for as Iknow: Junuary 25 - E. Windling Jebruary 3, 4, 5 - wening only " 940 # - all day / overnight " 23 - all day " 24 - wening

43

¥;

÷