

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA )

v. )

DEBORAH GORE DEAN )

Criminal No. 92-181 (TJH)

AFFIDAVIT OF DEBORAH GORE DEAN  
IN SUPPORT OF DEBORAH GORE DEAN'S MOTION FOR JUDGMENT  
OF ACQUITTAL PURSUANT TO F.R.CRIM.P. 29(a) and (d)  
AND MOTION FOR NEW TRIAL PURSUANT TO F.R.CRIM.P. 33

Deborah Gore Dean states the following:

1. On October 22, 1987, I attended a dinner of the St. Thomas More Society at the Mayflower Hotel. I and my cousin James Gore, Jr. shared a table with William Canfield, Judge and Mrs. Robert Bork, and Attorney General and Mrs. Edwin Meese. My records indicate that I paid my and Mr. Gore's share by a bank check for \$170.00. I remember the evening well partly because it was the night before the Senate vote on Judge Bork's nomination to the Supreme Court.

2. Attachment 1 hereto is the document that I believe was shown to me when I was cross-examined regarding whether Lynda Murphy had bought drinks for me at a place called "The Saloon Across the Street" during the trial of this case.

3. When I was Executive Assistant at HUD there were no car phones in the cars in which I would be driven by HUD drivers such as Ronald Reynolds. I believe that there were phones in the Secretary's car and the Undersecretary's car, in which I would ride on rare occasion. Those cars had specific assigned drivers.

Mr. Reynolds did not hold either of those positions while I was at HUD.

4. I am married to Richard A. Pawlik. Mr. Pawlik is a therapist at a clinic called "The Green Door," where he has been employed since 1990. Prior to taking his position at the Green Door, Mr. Pawlik had been working at The Guards restaurant in Georgetown since 1987. He continued to work at The Guards on a part time basis until early 1993. The Guards is located on the North side of M Street just as one enters Georgetown from downtown. I am familiar with M Street in Georgetown. To my knowledge there is no fine dining establishment named "The Green Door" or having a green door on either side of M Street in Georgetown.

5. I went to work at HUD in November of 1982. Lynda Murphy was no longer employed at HUD at that time.

6. I have known Lynda Murphy since 1980. I knew her well enough that I would have known if she had a horse farm in Virginia. To my knowledge she has never had a horse farm in Virginia.

7. During the time that I was at HUD, I never had lunch with John Mitchell at the Hay Adams or the Ritz Carlton (formerly the Fairfax Hotel). The only lunches I had with Mr. Mitchell would have been at the Grand Hotel or The Guards. To my knowledge, Mr. Mitchell rarely went out to lunch at other places.

8. As I testified in my trial, shortly after I read the HUD Inspector General's Report when it was released in April of 1989,

I called Special Agent Alvin R. Cain, Jr. to raise a number of matters with him about the information in the Report indicating that John N. Mitchell had earned a consulting fee from Governor Louis Nunn for the Arama project. Among the matters I raised with Mr. Cain was whether there existed a check to demonstrate that Mr. Mitchell had received a consulting fee from Governor Nunn. Mr. Cain told me that he could not show it to me, but that he knew a check existed. He told me that it was being maintained in the Regional Inspector General's Office. I asked him specifically if he had seen it himself, and he said that he had not but assured me that a check did exist.

9. At the time of my conversation with Mr. Cain, I was dating James P. Scanlan. Shortly after my discussion, I told Mr. Scanlan what Mr. Cain had said to me, including the statement that the check was maintained in the field.

10. As I testified in my trial, after I had spoken to Mr. Cain, I called Colonel Jack Brennan concerning the information I had learned indicating that Mr. Mitchell had received HUD consulting fees. Colonel Brennan informed me that Mr. Mitchell had received money from Mr. Nunn for services related to HUD. He also told me that he believed that Mr. Mitchell had received money from Richard Shelby for services related to HUD.

11. Shortly after that conversation, I informed Mr. Scanlan of what Colonel Brennan had told me, including what Colonel Brennan had told me about Richard Shelby.

12. During a trip to Los Angeles, California in May of

1986, Secretary Pierce stayed at the Beverly Wilshire Hotel. During that stay, Agent Alvin Cain's partner Agent Clarence Day was presented an awards upon his completion of 20 years of government service. This event also marked Mr. Day's retirement. In celebration, Secretary Pierce opened a very expensive bottle of champagne which was shared in his suite among the Secretary, Mr. Cain, Mr. Day, and myself. Afterwards, Mr. Cain, Mr. Day, and I, and several other HUD employees (including Eric Amig and Bob Davidson from HUD Headquarters and several local HUD employees) went to a night club in that hotel for a planned party in Mr. Day's honor. The night club was a famous place called Hernando's Hideaway. I left before others did, but before leaving paid the outstanding bill, which came to \$428.78. A copy of the receipt is attached as Attachment 2 hereto. Shortly after that evening, I received a thank-you note signed "Joe," which I understood to be a reference to the line in the song "Hernando's Hideaway: "Knock three times and whisper low--that you and I were sent by Joe." It had been a recurring joke during the party.

13. After I left HUD, it came to my attention from Mr. Arthur Winn, the developer-owner of the Castle Square project in Boston, Massachusetts, that an irregular funding had been granted him, and that the funding had been approved by Assistant Secretary for Housing Thomas T. Demery. I was also aware that Mr. Demery was to have recused himself from dealings with the project. I reported this information to Agent Alvin Cain and

spoke about it with the Deputy Assistant Secretary for Multi-Family Housing and the Undersecretary in an effort to cancel the funding. I spoke to Mr. Cain in his office. He did not take notes at the time. He said that he had heard of the project and based on what I had told him he would start an investigation.

14. At approximately 9:00 a.m. on October 19, 1993, I was dropped off by a taxi in front of the United States Courthouse. I noticed Ronald Reynolds and Pamela Patenaude greet each other. They then hugged and walked into the Courthouse together.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 11/30/93

Deborah Gore Dean  
Deborah Gore Dean



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ATTACHMENT 2