

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
Appellee,	:	
	:	No. 94-3021
v.	:	
	:	
DEBORAH GORE DEAN	:	
	:	
Appellant.	:	

AFFIDAVIT OF LANCE WILSON

Lance Wilson, being duly sworn, deposes and says:

1. I served as Special Assistant to Samuel Pierce, Secretary of Housing and Urban Development ("HUD"), from January 21, 1981, until March 8, 1981 and as Executive Assistant from March 8, 1981 until June 1, 1984.

2. My duties and responsibilities as Executive Assistant included advising Secretary Pierce on day-to-day matters and on major issues, reviewing various proposals and staff memos, handling political liaison, and any other matters Secretary Pierce might assign to me. I would characterize myself as the "chief of staff."

3. I first met Deborah Gore Dean in 1982 while she was working at the Department of Energy and interviewed her for a position in the Secretary's office.

Moderate Rehabilitation Program ("Mod Rehab")

4. I became involved in the Mod Rehab Program in late 1983 or early 1984. I would meet with developers or consultants and listen to their proposals. Generally, they sought my assistance in causing units to be sent to the housing authorities where they had projects to be approved and funded.

5. The Mod Rehab program was under the control of the Assistant Secretary for Housing, Maurice Barksdale, with whom I had daily contact. Barksdale, who ran the program in 1984, would authorize approval and funding of projects.

John Mitchell

6. John Mitchell and I both worked at the law firm of Mudge Rose Guthrie & Alexander but at different times. Shortly after I began working at HUD, I visited Mitchell at his office for a social call. At that time, Mitchell was a lobbyist and was interested in dealing with HUD issues.

7. In 1982-1983 I dealt with John Mitchell and Louie B. Nunn on a project which I recall was not a Mod Rehab project. I recall that Nunn came to meet with me about the project in 1982 or 1983. This project did not involve Aristides Martinez.

Arama

8. I had a number of conversations with Mitchell and Nunn about HUD's allocating approximately 300 units in order to

support a project they were working on in Florida which later became known as Arama. My recollection of having had several conversations with Mitchell and Nunn about the approval and funding for this project is reinforced by having reviewed several telephone messages to Mitchell from me. The messages are attached to this affidavit. The first message dated January 12, at 4:07 with notations reflects that I told Mitchell that the 300 units for the projects in Dade County, Florida we had previously discussed would be approved and that I had discussed it with Barksdale. Another telephone message dated January 26 at 2:32 from me to Mitchell also appears likely to have been related to the approval and funding for Arama since there was no other reason for me to have called Mitchell.

9. I met with Maurice Barksdale and recommended that he allocate the units assuming that the PHA applications for the units met HUD requirements. I was led to believe by Barksdale that he would approve the units for funding. In fact, by the time I left HUD I believed that Barksdale had approved the units for funding. Beside talking to Barksdale about this project, I recall talking to others in that office including Stuart Davis, Barksdale's Executive Assistant.

10. At that time there would have been a lag between the decision to fund Arama and the actual funding of the project because of the number of projects in the funding pipeline for the Dade County PHA.

11. I decided to leave HUD in April or May 1984. Before my

announcement I did not discuss my departure with anyone at HUD other than Secretary Pierce. Once my announcement was made it was thought that Alfred Moran, then HUD Regional Administrator in Chicago, would succeed me as Executive Assistant and not Dean.

12. My conversations with Mitchell and Nunn, my recommendation to Barksdale that the Arama project be approved, and Barksdale advising me that the units had been allocated and approved occurred prior to the time I left HUD and Ms. Dean assumed the position of "Acting" Executive Assistant to Secretary Pierce.

13. The activity on Arama occurred while Ms. Dean was in charge of the correspondence unit. That position would not have involved her in Mod Rehab. I recall no conversations with Ms. Dean or any dealings with Ms. Dean on the Arama project. I would have remembered such a conversation had one occurred.

14. I have reviewed the July 5, 1984 letter from Ms. Dean to Nunn. It was not unusual for HUD officials to either call or send a similar letter informing a particular consultant who was interested in a specific project that the units he or she was seeking were approved or denied for funding.

15. At the time of Ms. Dean's trial I had been convicted of one Count concerning my conduct while an executive of PaineWebber, Inc. and I was not willing to testify on the Arama matter or any other matter. Before my conviction was reversed by the Court of Appeals on June 17, 1994, I was granted immunity by Independent Counsel and testified before the Grand Jury. After

my conviction was reversed, I testified again before the Grand Jury. I do not recall having been shown any documents or asked any questions concerning Arama by the Independent Counsel's office before, during, or after my Grand Jury testimony.

Date: December 6, 1996

Lance H. Wilson
LANCE WILSON

NEW YORK, NEW YORK, to wit:

Lance Wilson, Affiant, being duly sworn, deposes and says, that he has read the foregoing Affidavit and knows the contents thereof and that the same are true of his own knowledge except as to the matters therein stated to be alleged on information and belief, and as to those matters he believes them to be true.

Subscribed and sworn to before me this 6th day of DECEMBER, 1996.

Bonnie S. Dublin
Notary Public

My Commission expires: **BONNIE S. DUBLIN**
Notary Public, State of New York
No. 01095027399
Qualified in New York County
Commission Expires May 23, 1996

WHILE YOU WERE AWAY

FOR <u>MR. M.</u> DATE <u>1-12</u> TIME <u>4:07</u> <small>AM</small>	
M <u>LANCE WILSON</u>	
OF _____	TELEPHONED _____
PHONE <u>755-1417</u>	<input checked="" type="checkbox"/> RETURNED YOUR CALL
<small>AREA CODE</small> <small>NUMBER</small> <small>EXTENSION</small>	<input type="checkbox"/> PLEASE CALL
MESSAGE _____	<input type="checkbox"/> WILL CALL AGAIN
<u>300 units</u>	
<u>Forward to Rand C. [unclear]</u>	
<u>T. [unclear]</u>	
SCNED	<small>THE</small> <small>DATE</small> <small>TIME</small> <small>ALSO</small>

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IMPORTANT MESSAGE

FOR Gen. Mitchell

DATE 7-26 TIME 2:32 AM

MR. Lance Wilson

OF _____
PHONE 755-6417

<input type="checkbox"/> I'VE CALLED	<input type="checkbox"/> PLEASE CALL	<input type="checkbox"/>
<input type="checkbox"/> I'VE TOLD YOU	<input type="checkbox"/> WILL CALL AGAIN	<input type="checkbox"/>
<input type="checkbox"/> I'VE ASKED YOU	<input type="checkbox"/> RUSH	<input type="checkbox"/>
<input type="checkbox"/> I'VE TOLD YOUR OFFICE	<input type="checkbox"/> SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE _____

SIGNED [Signature]
LIVING IN U.S.A.

TOPIC FORM 3000P

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