

**Testimony of Deborah Gore Dean (Oct 12, 1993) Regarding Learning of
John N. Mitchell's HUD Consulting**

[The material below is from a scanned copy of the transcript converted to text. There may be minor inaccuracies due to the conversion process, though I am not aware of any.]

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13 Q. You have testified concerning your relationship with John
14 Mitchell.

15 A. Yes.

16 Q. When was the very first time that you learned that
17 Mr. Mitchell was being paid for consulting work he was doing in
18 relationship to HUD?

19 A. The -- I learned about it the day that the HUD Inspector
20 General report came out on the Mod Rehab Program after - well,
21 it was in 1989, I believe. And it was a, a big report, a long
22 report. Everybody had been waiting for it to come out.
23 And it was basically an investigation of developers'
24 ties to a charity that Mr. Demery had been sponsoring and whether
25 or not that had any influence on decisions that were made, and it
2616

1 was of great interest. And I remember calling the Inspector
2 General's office, to the man who was running the report -- who
3 wrote the report, the head of the investigations unit, his name
4 was Al Cain, and I called him, and I said, "How do I get a copy
5 of the report?"

6 And I remember it was, sixty-some dollars was the fee
7 to get it, and I remember sending Marti Mitchell at that time
8 down with it, a check to pick up the report, and the report came
9 back, and I opened it up, and about the second or third page, it
10 said --

11 MR. O'NEILL: Objection, Your Honor.

12 THE COURT: I'll sustain it.

13 I think the question was what did she learn of any
14 payments to Mr. Mitchell.

15 THE WITNESS: I learned about it when I opened up the
16 report.

17 THE COURT: All right.

18 BY MR. WEHNER:

19 Q. Did you read the report?

20 A. I, around the second or third page of the report, as I
21 remember, there was a listing of consultants who had earned fees
22 in the Mod Rehab Program and had said John Mitchell --

23 MR. O'NEILL: Objection, Your Honor.

24 THE COURT: I'll sustain the objection to the report
25 unless you have some other grounds to offer it. She can testify

2617

1 that's how she learned of it.

2 THE WITNESS: That's how I learned about it, and it had

3 an amount of money.

4 BY MR. WEHNER:

5 Q. Okay. After you learned -- was that the first time you knew

6 that John Mitchell was receiving dollars based on consulting with

7 HUD?

8 A. Yes.

9 Q. This was in May -- or, I'm sorry, April of 1989?

10 A. Yes, the day the report came out.

11 Q. Was John Mitchell alive, or had he passed away by then?

12 A. He had died the previous November.

13 Q. Did you place any telephone calls after you heard that in

14 the report -- after you discovered that information?

15 A. Yes.

16 Q. Who did you call?

17 A. I called Al Cain.

18 Q. What did you say to Mr. Cain?

19 A. I told him that I considered him to have been a friend and I

20 couldn't believe that he wouldn't have told me about this before

21 now and that I knew it wasn't true, that John would never have

22 done that, and that he better be prepared, because I was really

23 mad, and I wanted to see that check, and if there had been a

24 check written to John Mitchell, Al better have a copy of it, and

25 I was coming down there, and if I found out that he was, in any

2618

1 way had misinterpreted or had misrepresented John's actions, I

2 was going to have a press conference and I was going to scream

3 and yell and carry on.

4 And Al said, Al told me that he -

5 THE COURT: I'll sustain the objection. Don't get into

6 what he said.

7 BY MR. WEHNER:

8 Q. Did you have any further conversation with anyone else other

9 than Mr. Cain shortly after you discovered that information?

10 A. Yes. I called Jack Brennan and told Jack Brennan that I

11 wanted him to come to my office with all of John's papers so that

12 I could prove that John hadn't done any business with HUD and

13 hadn't gotten any money.

14 Q. Did you learn during that conversation that Mitchell had

15 received money?

16 A. Yes. He told me that -

17 MR. O'NEILL: Objection once again, Your Honor.

18 THE COURT: All right.

19 BY MR. WEHNER:

20 Q. Based on your conversation with Mr. Brennan, did you reach
21 an understanding then as to what Mr. Mitchell's role was in the
22 mod rehabilitation process?

23 MR. O'NEILL: It's hearsay, Your Honor.

24 THE COURT: Yes, it is still hearsay. I think she can
25 say what actions she took and what she learned of things.

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1 BY MR. WEHNER:

2 Q. Did you speak to Mr. Shelby at that point?

3 A. No. I understood from Mr. Brennan that Mr. Shelby might be
4 involved, and I have never spoken to Mr. Shelby since that day,
5 and I didn't call him. I didn't understand how it could have
6 happened.

7 Q. When did you find out that Mr. Mitchell, the amount of money
8 that Mr. Mitchell made?

9 MR. O'NEILL: Objection. Asked and answered, Your
10 Honor.

11 MR. WEHNER: It hasn't been asked and answered, Judge.

12 THE COURT: The amount of money, you're talking about
13 apart from whatever she said she learned earlier?

14 MR. WEHNER: No, the initial question was when she
15 initially learned that John Mitchell had made money.

16 THE COURT: This is how much money?

17 MR. WEHNER: This is how much.

18 THE COURT: All right, go ahead.

19 Go ahead. The question was when did you find out how
20 much money Mr. Mitchell had made?

21 THE WITNESS: The -- the day or two before the, before
22 the Independent Counsel issued an indictment, they had me come
23 down to the office, and they read to me what was going to be in
24 the indictment, and that was the first time I understood the
25 extent to which Mr. Mitchell had been involved.