

THE HSI LAI TEMPLE FUNDRAISER AND MARIA HSIA

The fundraiser attended by Vice President Gore on April 29, 1996 at the Hsi Lai Temple in Hacienda Heights, California, has been the focus of considerable attention and controversy ever since reports first surfaced in the national press revealing that some of the donations given to the DNC in connection with this event were unlawfully reimbursed.¹ Over the course of its investigation, the Committee has examined the various allegations of illegality and impropriety that have surfaced in connection with this event. Furthermore, the Committee has conducted a broader inquiry into the unlawful involvement of the Hsi Lai Temple in the 1995-96 election cycle and the complex chain of events that produced this involvement.

As a result of these inquiries, it has become apparent that the DNC's Hsi Lai Temple fundraiser on April 29, 1996 was merely one instance — albeit the most significant one — in an ongoing campaign of illegal Temple donation-laundering arranged by a woman named Maria L. Hsia in support of Democratic candidates. Nor was this campaign merely an aberration confined to the 1995-96 election cycle. Rather, it had roots stretching back to 1988, with the decision of James Riady, John Huang, Maria Hsia, and others to organize themselves into a political fundraising and lobbying organization in order to advance their interests through U.S. politics.

¹ See, e.g., Phil Kuntz, "Instant Karma: Cash Gets to Democrats Via Buddhist Temple," *Wall Street Journal*, Oct. 17, 1996 (recounting allegations by Buddhist nun that DNC donation for Gore event was reimbursed). This early coverage prompted the Christian Coalition to file a complaint against the DNC with the Federal Election Commission in connection with the Hsi Lai Temple fundraiser. See generally Colleen Sealander, letter to Master Shing Yun, Oct. 29, 1996 (Ex. 1) (forwarding complaint to Temple, with attachments).

The Temple-related issue that has hitherto received the most attention in the press — Vice President Gore’s knowledge (or alleged lack thereof) with regard to the status of his April 29 luncheon as a DNC fundraiser — is addressed in this section. It will be obvious from the evidence recounted herein that despite his various denials, the Vice President was well aware that the event was one designed to raise money for his party. Preoccupied by a narrow debate over the inconsequential terminology of “community outreach,” “finance-related events,” “donor maintenance,” and “fundraisers,” many observers have missed the forest for the trees. The real significance of the Temple incident lies not in the Vice President’s lack of candor, but in the ongoing relationship this affair illustrates between him — and the Democratic Party — and a small but influential political clique headed by Riady, Huang, and Hsia.

As will become clear, despite the participation of Temple monastics in criminal wrongdoing in connection with the April 1996 event and in Hsia’s broader campaign of Democratic Party donation-laundering, the Temple itself seems to have been only a secondary actor in this drama. Indeed, Temple officials seem to have known little — if anything — about the political campaigns they illegally supported at Hsia’s direction.² The real significance of the Temple incident may therefore be found in what it reveals about the activities and agenda of its key decision-makers — Maria Hsia and John Huang.

² Since the Hsi Lai Temple received electronic alarm services from a corporation called “DNC,” many of the monastics solicited to give money to the Democratic National Committee may have mistaken the party for the company. *Cf., e.g.*, IBPS check #1278, Jan. 5, 1996 (Ex. 2) (\$50 payment to “DNC,” apparently for alarm services).

Hsia and Huang have both asserted their Fifth Amendment privilege against self-incrimination and have refused to cooperate with the Committee. Nevertheless, from documentary evidence produced pursuant to subpoena and from interviews and depositions of persons involved, the Committee has been able to develop a detailed understanding both of the events at issue and of the role of Hsia and Huang therein.

I. MARIA HSIA

Hsia Ling — better known by the Anglicized version of her name, Maria Lynn Hsia — was born in 1951 and first came to the United States on a student visa in 1973. After returning briefly to her native Taiwan in 1974, she returned to this country to become a permanent resident in 1975. Not long after her arrival, she began working as a case worker at Popkin & Shamir, a personal injury and immigration law firm.³ She became a U.S. citizen in 1986.⁴

Though not a lawyer, Hsia took up several successive positions with various immigration law firms, leaving Popkin for a firm headed by Patrick Fleming, working as a consultant for Damrell, Damrell & Nelson, then joining Howard Hom & Associates, and working with Arnold Malter, before going into business under her own name as Hsia & Associates in 1991.⁵ Throughout this period, the

³ Maria Hsia, hearing transcript from *Hsia v. Hom*, Ca. Super. Ct., No. BC 059523, Aug. 16, 1995, pp. 16-17 (Ex. 3).

⁴ James Sterngold, “Political Tangle of Taiwan Immigrant,” *New York Times*, June 9, 1997.

⁵ Hsia’s involvement with former INS lawyer Howard Hom began in the summer of 1979, when they were both enrolled in Cantonese language classes at the University of California in Los Angeles. Deposition of Howard Hom, Aug. 27, 1997, pp. 8- 9. They began living together in 1980, and when the Fleming firm split up in 1986, Hom went into business with Hsia as they took over most of Fleming’s immigration clients. See Memorandum of Interview of Howard Hom, Aug. 10, 1997, p. 1. This personal-cum-business relationship with Howard Hom lasted until late 1990. Howard Hom deposition, p. 9.

immigration services business generally treated Maria Hsia well. In the late 1970s and early 1980s, providing immigration services to Taiwanese citizens was an “extremely lucrative” field.⁶ Hsia, it appears, profited accordingly. Her reported income in 1982, for example, was \$637,000.⁷

Hsia’s first contact with political fundraising came in early 1982 at a cocktail party she attended with Howard Hom. At that reception, they met briefly with March Fong-Eu, an Asian-American woman who was then California’s Secretary of State, and Fong-Eu’s son, Matthew Fong, who was then his mother’s campaign manager and subsequently became California’s state treasurer. At a subsequent meeting, Fong enlisted Hom and Hsia to help with fundraising for his mother’s reelection. As Hom later recalled it, “Maria offered to take over the fund-raising activity and, in fact, she explained to Mr. Fong that she felt that she and her friends could probably do a better fund-raiser than Howard and his lawyer friends That was the genesis of how fund-raising got started with Maria.”⁸

It was her immigration work that helped propel Hsia into the political arena. Her interest in political activity was heavily mercenary: it provided her with contacts and friends in government circles in ways that she believed helped her immigration services business in at least two ways.

⁶ See Trial Brief of Defendant and Cross-Complainant Howard Hom in *Hsia v. Hom*, Ca. Super. Ct., No. BC 059523, p. 6 (Ex. 4) (describing immigration law as profitable “largely due to tremendous uncertainty in Taiwan over the future of the island nation” caused by the U.S. government’s abrogation of formal diplomatic relations with Taiwan).

⁷ Ex. 3, p. 69. Her income in 1983 was \$449,000. By 1986 it had slipped to \$362,000. *Id.* According to press reports, this stream of revenue enabled her to purchase a Rolls Royce automobile and a home in Beverly Hills. Sterngold, *supra* note 4.

⁸ Hom deposition, pp. 10-12.

First, such contacts might be useful in helping her clients with specific immigration matters. When she and Hom ran into some difficulty with Immigration and Naturalization Services (INS) officials in 1983 over a series of visas they had obtained for clients through the U.S. consulate in American Samoa, for example, Hsia decided that “a political approach might be useful” to complement more conventional litigation strategies.⁹ Through her political contacts, she persuaded U.S. Senator Alan Cranston and U.S. Representatives Mel Levine, Howard Berman, and Harry Reid to write letters to the INS on her behalf. Cranston was already a recipient of political contributions Hsia had raised through her contacts in California’s Asian community,¹⁰ and after their help with this immigration issue Hsia began raising money for Levine, Berman, and Reid as well.¹¹ Their queries forced the INS to undertake the unusual additional step of publishing a report in December 1983 on its handling of these particular cases.¹² The message was not lost on Hsia that political contacts and political fundraising could indeed pay her concrete dividends.¹³

⁹ *Id.*, p. 18.

¹⁰ Maria Hsia’s fundraising efforts on Senator Cranston’s behalf continued, in fact, at least through May 1989. *See* Handwritten note by Hsia’s assistant Jeffrey Su listing attendees at Cranston fundraiser on May 23, 1989, including Maria Hsia and John Huang (Ex. 5). As a result of Hsia’s longstanding contacts with Cranston, he invited her to address a field hearing of the Senate Foreign Relations Committee’s Subcommittee on Asia and Pacific Affairs (which he chaired) at UCLA in February 1989. *See* Alan Cranston, letter to Maria Hsia, Jan. 23, 1989 (Ex. 6); *see generally* Hom deposition, pp. 180-82.

¹¹ Hom deposition, p. 20.

¹² Sterngold, *supra* note 4.

¹³ *See generally* Hom deposition, p. 15 (“[E]specially on the Federal level, when Maria started to meet Congressmen and Senators, she realized that this was helpful to my immigration clients who, because of the[ir] contact with the Federal Government, might have some need of a letter from a Senator or a Congressman to get a case moving through the red tape of the bureaucracy.”).

Apart from concrete help with specific immigration cases, however, Hsia's political activity was useful to her business in a second, more general sense: it helped her cultivate an image of a "connected" political "player" who could "make things happen" for her clients. As Hom put it,

[I]t was also good in the sense of a public relations image where the Chinese newspapers would say, Here's Howard Hom and Maria Hsia having a reception with the particular Senator or Congressman, the implication obviously being that we were well-connected and that clients should view that, if anything happened to their case, we had this kind of extra protection, so to speak.¹⁴

Her political fundraising in California politics, for example — which had begun with her involvement with Hom in March Fong-Eu's campaign in 1982 — quickly proved useful in this regard. With help from fundraising beneficiaries March Fong-Eu and California Lieutenant Governor Leo McCarthy, for example, Hsia was appointed to several honorary state positions, the prestige of which benefitted her immigration work.¹⁵

As luck would have it, however, the synergy between Hsia's political activity and her immigration business did not flow in only one direction. Her immigration work may, in fact, have

¹⁴ *Id.*

¹⁵ *See, e.g.*, Ex. 3, p. 58 ("I was sitting on the California Economic [Development] Commission, which gave me a lot of exposure and [helped] to draw more [immigrant] investors [under the Immigration Act of 1990] to come into this country.") These state positions included seats on the Commission for Economic Development and the California-Taiwan Sister State Legislative Task Force, and received weighty titles as March Fong-Eu's "Honorary Deputy Secretary of State" and "Special Assistant for Asian Affairs." *See* Maria Hsia biography, p. 2 (Ex. 7) (listing positions); Hom deposition, pp. 12-13; Leo McCarthy, letter to Maria Hsia, April 8, 1991 (Ex. 8) (discussing upcoming seminar for Commission for Economic Development).

Hsia's early political activity also had national results. DNC Chairman Ronald Brown, who would later supervise Hsia's friend John Huang in his Department of Commerce, appointed Hsia to the DNC's "National Convention Site Selection Committee." *Cf.* Ronald H. Brown, letter to Maria Hsia, June 14, 1990 (Ex. 9).

introduced her to Indonesia's Lippo Group conglomerate. Having been put in contact with the Indonesian section of Lippo Bank by one of her clients, she acquired some further clients through them.¹⁶

By the late 1980s, Hsia had begun to attempt on the national stage what she had by then accomplished in California: building close fundraising and political ties to prominent politicians who were in a position to help her and her friends. At least initially, however, this project — which was to culminate with her efforts to involve the Hsi Lai Temple on behalf of national Democratic candidates in the 1996 elections — could not be accomplished alone. To move more into national politics, Hsia required some new friends.

The involvement of Hsia and the Hsi Lai Temple in donation-laundering in support of the Clinton/Gore ticket in 1996 was the culmination of a relationship between Hsia and Vice President Gore that stretches back to 1988 — the year that James Riady, John Huang, Maria Hsia, Eddy Yang, Howard Hom, Fred Hong, and others established the Pacific Leadership Council (PLC) as a fundraising and lobbying organization to promote their interests in U.S. politics.¹⁷

From the beginning, it should be noted, the PLC was in large part a vehicle for the advancement of Lippo interests. James Riady, the son of Mochtar Riady and scion of the family dynasty that ran the Lippo Group, was instrumental in the PLC's founding and served alongside Hsia

¹⁶ Maria L. Hsia, deposition in *Hsia v. Hom*, California Superior Court, No. BC 059523, May 18, 1994, pp. 29-31 (Ex. 10).

¹⁷ As Hom recalled it, the purpose was to build the group into a powerful political organization; it was designed to give its charter members “the same kind of clout as, say, other organized groups . . . like the Teamsters or the National Rifle Association” Hom deposition, p. 24.

and Fred Hong as one of the organization's first co-chairs.¹⁸ Indeed, James Riady was perhaps the single most important figure in the PLC's early political activity, hosting its first political fundraiser on April 22, 1988,¹⁹ using his business contacts to facilitate the group's fundraising,²⁰ and employing his own money and that of Lippo employees to make up for unanticipated shortfalls in PLC fundraising efforts.²¹

¹⁸ *Id.*

¹⁹ *Id.* p. 26; *see also* Maria Hsia, facsimile transmission to John Huang, March 30, 1988 (Ex. 11) (referring to upcoming event at "James's house on 4/22/88").

²⁰ One document recounting contributions made to the Democratic Senatorial Campaign Committee (apparently in 1988), for example, lists 13 persons or couples who had contributed between \$5,000 and \$10,000 to that organization. Beside each name is listed the name of the person who solicited that contribution. James Riady's name appears next to 11 of the 13 donations, suggesting that he was responsible for every contribution but two (the ones that were made by Hsia and Hom themselves). David Lang, memorandum to Mary Leslie, May 4, 1988 (Ex. 12); *see also* Hom deposition, p. 28 (explaining that handwritten notations next to each name indicate solicitor). Another document produced to the Committee, recounting solicitations for new membership in the "Leadership Circle/Business Round Table Circle," lists Maria Hsia and James Riady as having each solicited \$55,000. List of Leadership Circle Solicitations, undated (Ex. 13).

²¹ John Huang, Riady's employee, was particularly active in this regard. *See* Hom deposition, pp. 30-32 (recounting that John Huang commonly "stepped in to fill the slot" if Hsia or others "would fall short of [their] goal and would have to look for other people to bail her out ...[by] making an extra contribution"); John Huang, note to Maria Hsia, Dec. 16, 1989 (Ex. 14) (forwarding blank check drawn on account at Lippo bank with handwritten instructions to use it for either \$500 or \$1,000 donation to Fund for a Democratic Majority, depending upon whether another contributor met anticipated commitment); Jeff Su, letter to "Pamela," April 15, 1991 (Ex. 15) (enclosing Huang check to "Mikulski for Senate" in order to "serve as a replacement for Phillip So's check"); Maria Hsia, letter to Rick Weiland, April 28, 1988 (Ex. 16) (forwarding check from Huang which "represents David Yeh and Ossy Tirta's contributions"); Ex. 13 (listing solicitations by Riady for "New Members Leadership Circle/Business Round Table Circle" with handwritten alterations replacing names of Ossy Tirta and David Yeh with that of John Huang).

A “wish list”²² James Riady submitted to Hsia in April 1988 summarizing “issues need[ing] to be followed up,”²³ for example, suggests Riady’s role in steering the PLC and interest in enlisting it, and through it the Democratic Senatorial Campaign Committee (DSCC), as a vehicle for the promotion of Lippo interests. This list, prefaced by a handwritten memorandum on Bank of Trade/Lippo Group²⁴ stationery, outlined Riady’s plans for the group’s political activity in U.S. politics on a Senator-by-Senator basis, outlining a specific “agenda” for six U.S. Senators: Daniel Inouye, Tim Wirth, Kent Conrad, James Exon, John Melcher, and Tom Daschle. More broadly, Riady suggested a number of “[o]ther issues” that the PLC should pursue, among them:

- “(I) The need for the Senators to impress upon Taiwan to allow Asian-American banks (or at least Bank of Trade) to be allowed to open a branch office in Taiwan in the very near future.
- (ii) Appointments of Asian-Americans to policy making positions in the Federal Government.
- (iii) Visit of US Senators on an ongoing and regular basis to Indonesia, Hong Kong and Taiwan at our invitation or with us as host.
- (iv) Participation of Senators at specific Asian-American community activities in California such as the NACAB, The Asia Society, the Indonesian Business Society and other similar bodies.
- (v) Funds of various Federal Government Agencies or government bodies as well as that of DSCC to be deposited at the Asian-American banks in the U.S. Perhaps the DSCC could start by making a deposit at Bank of Trade.

²² The term is Howard Hom’s. *See* Hom deposition, p. 36.

²³ James Riady, memorandum to Maria Hsia, April 26, 1988, p. 1 (Ex. 17).

²⁴ The Bank of Trade was a Lippo-owned bank that is now known simply as Lippo Bank.

(vi) Assistance for special, exceptional immigration cases when and if it arises.”²⁵

Riady’s role in personally directing such activity, however, declined over time as it became difficult for him to reconcile the broader responsibilities of helping run his family’s international business empire with day-to-day involvement in U.S. politics. As a consequence, he found it necessary to step down as co-chair of the PLC. To ensure that Lippo’s interests were still advanced by the organization, however, Riady delegated his role to Huang, who was at that time a top executive with the Lippo-owned Bank of Trade and thus Riady’s employee. Huang thereafter served as Riady’s agent — both on the PLC, taking over Riady’s position as the organization’s co-chair, and more generally with regard to U.S. political activity.²⁶ As Maria Hsia herself²⁷ put it in a facsimile transmission to her PLC co-chair Fred Hong, “John Huang . . . is putting D.S.C.C. together for James.”²⁸

The PLC swung its weight in behind Democratic Party candidates in several of the major national races of 1988, most prominently Michael Dukakis’ campaign for President and Leo McCarthy’s campaign for the U.S. Senate.²⁹ Both of these campaigns, however, were conspicuously

²⁵ Ex. 17, p. 3.

²⁶ See Hom deposition, pp. 24-25.

²⁷ As suggested by Riady’s April 1988 “wish list,” Hsia was apparently also expected to play a role in implementing James Riady’s agenda. See Ex. 17, p. 1 (noting that with regard to political agenda, “it may be best to coordinate through a person — *i.e.*, you.”).

²⁸ Maria Hsia, facsimile transmission to Fred Hong, March 30, 1988 (Ex. 18).

²⁹ See generally Hom deposition, pp. 22-25; “89 for 90,” *Los Angeles Times Magazine*, Jan. 1, 1989, p. 34 (identifying Hsia as “at the center of a predominantly Asian group of fund-raisers rapidly emerging as a major force in the hotly competitive Los Angeles political money scene. Last fall, the group raised substantial sums for, among others, the Dukakis and McCarthy campaigns. Throughout 1989, its’ leading delegations of Senators and Congressmen on tours of

unsuccessful — leading the PLC to cast around for a way to rekindle its political fortunes. Ultimately, the PLC decided to try to revive the organization’s political activity by organizing a high-profile trip to Asia for a group of U.S. Senators.³⁰ Significantly, it was this search for new political opportunities in 1988-89 that helped bring Hsia and the Riady/Huang group together, simultaneously, both with Venerable Master Hsing Yun’s Fo Kuang Shan Buddhist order and with then-U.S. Senator Al Gore.

The connection between Hsia and her fellow PLC members and the Fo Kuang Shan Buddhist order³¹ — the Taiwanese parent organization of the International Buddhist Progress Society (IBPS) and its Hsi Lai Temple in Hacienda Heights, California — came about through Eddy Yang. Yang, also a founding member of the PLC, headed the Sunlight Corporation a furniture company and had

the far east”). Hsia was also a “regional chair” for the 1988 Democratic Senate Dinner in Los Angeles and — along with Huang, Hom, and Fred Hong, among others — co-chaired at least one Dukakis campaign fundraising dinner in Los Angeles sponsored by the “Asian-American Friends of Dukakis.” (The “general chairman” for the latter event was the now-convicted campaign-finance violator Albert Lum.) *See* 1988 Democratic Senate Dinner brochure, p. 1 (Ex. 19); Dukakis dinner program (Ex. 20).

³⁰ As it turned out, this trip would be among the PLC members’ most important steps toward implementing the U.S. political agenda James Riady had spelled out in April 1988, *see supra* text accompanying note 25 (listing agenda item of having Asian-Americans appointed to high office), until the success in 1994 of the group’s efforts to have Huang appointed to a high government position. *See* Hom deposition, p. 39; *see also* Ex. 21 (letters on behalf of John Huang: Howard Hom, letter to Doris Matsui, Dec. 14, 1992; Sen. Paul Simon, letter to Susan Brophy, Jan. 6, 1993; Sen. Thomas Daschle, letter to Richard Riley, Jan. 8, 1993; Mike Wantanabe, letter to Melinda Yee, Jan. 19, 1993; Sen. Kent Conrad, letter to Bruce Lindsey, Jan. 21, 1993; Nancy H. Au, letter to Melinda Yee, Jan. 26, 1993; Kathleen Brown, letter to Jody Franklin, Jan. 28, 1993; Maeley Tom, letter to John Emerson, Feb. 17, 1993; Leo McCarthy, letter to Bruce Lindsey, Feb. 22, 1993; Leo McCarthy, letter to John Emerson, Feb. 22, 1993).

³¹ This Taiwanese-based sect was founded in 1969 by Li Kuo-Shen, who subsequently took the name Hsing Yun (“Stars and Clouds”) as his “Dharma name” upon becoming a monk. By the mid-1990s, the Order had developed into a worldwide network having some 130 temples, as many as 1.5 million adherents, and over \$400 million in assets. *See* Kevin Sullivan, “Monk at Issue is an Icon in Taiwan,” *Washington Post*, Oct. 25, 1996, p. A22.; Geoff Spencer, “Buddhism Blossoms in Australia’s Industrial Heartland,” *AP Worldstream*, Oct. 8, 1995.

been for many years an “advisor” to the Fo Kuang Shan order in Taiwan.³² As Howard Hom recalled, Yang stepped in and “volunteered the temple’s auspices” after Hsia had “problems lining up a corporate sponsor that she knew,” making the temple available to help underwrite the cost of the PLC’s trip to Asia for Senator Gore in early 1989.³³

Involving the Fo Kuang Shan Order in the PLC’s agenda was in many ways an inspired choice, as it had acquired a reputation for political activity in Taiwan.³⁴ Master Hsing Yun saw himself as destined to play an important role on the world stage as an unofficial advisor to political leaders both in Taiwan and elsewhere.³⁵ Not for nothing, therefore, was Master Hsing Yun known as “the political monk.”³⁶

³² See Hom deposition, pp. 49-50.

³³ *Id.*

³⁴ Master Hsing Yun, for example, has served since 1988 on the Central Advisory Committee to Taiwan’s ruling Kuomintang Party (KMT), supported an independent Buddhist candidate (Chen Lu-an) in Taiwan’s 1995-96 presidential election campaigns, and in 1997 accepted an appointment to the Taipei government’s cabinet-level Overseas Chinese Affairs Commission. Debbie Kuo, “Master Hsing Yun Appointed Commissioner of O’Seas Chinese Affairs,” *Central News Agency* [Taiwan], Feb. 16, 1997; Sullivan, *supra* note 31, p. A22; Tsong Ching, “Master Hsing Yun and Preceptor of State Yu Lin,” *Pacific Journal*, May 3, 1996 (Ex. 22) (translated by Michael Yan for the Governmental Affairs Committee). According to press reports, Hsing Yun’s “pattern of influence building” has given him ties to “a number of world leaders.” Sullivan, *supra* note 31; see also generally Stuart Chandler, *Establishing Friendly Relations: The Fokuangshan Perspective on the Hsi Lai Temple Political Donations Controversy* (unpublished monograph, June 14, 1997) (Ex. 23, p. 13).

³⁵ Hsing Yun once wrote a novel about a Buddhist monk named Yu Lin, who was appointed to political office as “Preceptor of State” by an emperor of the Ch’ing dynasty. This story, which was made into a movie and a television series in Taiwan, outlines Hsing Yun’s “critique and expectations of a religious-leader-turned-Preceptor-of-State” and suggests that he entertains similar ambitions for himself. Ching, *supra* note 34; cf. Fu Chi-ying, *Handing Down the Light: The Biography of Venerable Master Hsing Yun* (Hsi Lai University Press 1996) (translated by Amy Lui-Ma) (Ex. 24, p. 106).

³⁶ John Mintz, “Fund-Raisers Pressured Temple After Gore Visit; 12 Donors Were Reimbursed,” *Washington Post*, June 13, 1997, p. A20 (recounting that Hsing Yun has called himself “political

To this end, in expanding his order to the United States,³⁷ Hsing Yun apparently hoped to continue “spreading the Dharma,” *i.e.*, increasing popular receptivity to Buddhist ideas and culture, through political fundraising in U.S. politics.³⁸ As he made clear to the Committee when he was interviewed in Taiwan in June 1997,

Speaking of political donations, I feel that, my entire life, I have been a person who enjoys doing good deeds and giving to others. . . . I give people assistance. I am grateful for the economic aid that the United States government gave to the Republic of China thirty or forty years in the past. Having established two-way communication with the United States, I feel that I ought to express my gratitude and repay the country.³⁹

monk”); *see also* Ching *supra* note 34.

³⁷ The name of the elaborate temple complex constructed by the IBPS to be the headquarters of the Fo Kuang Shan order’s North American operations illustrates its intended mission of spearheading the order’s expansion into the United States: Hsi Lai means “Coming to the West.” Hsing Yun’s biographer describes the founding of the temple in Hacienda Heights as “a milestone that mark[ed] the Dharma coming to the Western world.” (Ex. 24, p. 342).

³⁸ *See* Ex. 23, p. 4 (“As another means to establish Hsi Lai Temple as a legitimate, fully accepted member of the [U.S.] community, Master Hsing Yün and the temple’s various abbots have consistently sought to secure ‘friendly relations’ with local and national political leaders.”); *id.*, p. 16 (describing order’s political involvement in Taiwan and noting that “[i]n light of Master Hsing Yün’s willingness, even eagerness, to create ‘friendly relations’ with government officials, both in Taiwan and abroad, the fact that he invited Gore to Fokuangshan in 1989, and subsequently honored him with a banquet at Hsi Lai Temple, no longer seems so bizarre.”).

³⁹ Hsing Yun, “Statement to Governmental Affairs Committee Fact-finding Team” June 17, 1997 (Ex. 25, p. 2). (This document was prepared by Hsing Yun for the Committee in advance of his interview on June 17, 1997; it does not represent an account of this interview.)

This penchant for political involvement helped make Hsing Yun's Fo Kuang Shan order an eager collaborator in Maria Hsia's political activity.⁴⁰ Over the next few years, Hsing Yun's organization helped Hsia and her PLC co-founders in three principal ways:

- (1) The Fo Kuang Shan order helped pay for the PLC's trip to Asia in early 1989 and hosted the PLC delegation at its temple headquarters in Kiaoshung, Taiwan;
- (2) The order provided Maria Hsia with a lucrative sideline in procuring "religious worker" visas and green cards for Temple monastics and devotees coming to the United States under provisions of the 1990 immigration act for the passage of which she had successfully lobbied; *and*
- (3) The order gave Hsia access to a deep reservoir of money for illegally laundered political donations, upon which she would draw heavily in the years to come.

In return, the Fo Kuang Shan order perceived itself as becoming increasingly influential within the Democratic Party. By late 1996, brochures prepared by the Hsi Lai Temple had come to describe Hsing Yun as an "informal liaison to the White House on Asian affairs."⁴¹

The PLC's trip to Asia in 1989 was organized by John Huang, James Riady, and Maria Hsia, with Huang playing the lead role. Here again, James Riady's enormous role in the PLC was visible: according to a report on the preparations Huang gave to a PLC meeting in November 1988, Riady and his employee Huang provided \$10,000 in seed money to help cover the trip's costs. This money

⁴⁰ Ironically, however, according to Howard Hom, Maria Hsia was generally contemptuous of persons who became involved in political activity through political conviction; she believed that real political power flowed from campaign contributions rather than passion and policy activism. Hom interview, p. 3.

⁴¹ Lena H. Sun, "Gore 'Community Outreach' Touched Wallets at Temple: April L.A. Event Raised Funds and Questions," *Washington Post*, Oct. 25, 1996, p. A1.

was deposited in an account controlled by Huang, Hsia, and Fred Hong at Riady's own Bank of Trade.⁴² Overall sponsorship of the trip was ostensibly to be provided by a "non profit organization in Indonesia"; this was being arranged by James Riady.⁴³

Originally, the plan had been to invite as many as five U.S. Senators, accompanied by 15 PLC members, on a trip to Taiwan, Indonesia, and Hong Kong.⁴⁴ All but one of the Senators invited to participate, however, turned down the Council's invitation.⁴⁵ But Senator Gore faced re-election in 1990, and had depleted his campaign funds in his failed 1988 presidential bid.⁴⁶ Having been told by Senator Gore that he "would like to know the Asian community better and would like to be closer to them,"⁴⁷ Maria Hsia explicitly promised Senator Gore her political support, as well as that of PLC

⁴² Minutes of PLC Meeting, Nov. 10, 1988, p. 1 (Ex. 26).

⁴³ Riady's role as perhaps the single most important figure behind the 1989 trip is also suggested by a letter sent in July 1988 by Huang's assistant to a member of Senator Kent Conrad's staff as part of the PLC's efforts to organize the Asia trip. According to this letter, Riady had picked the "dignitaries, public officials and business leaders in Taiwan, Hong Kong, Singapore and Indonesia" who were to be visited by the PLC delegation. Interestingly, this list included a number of "PRC Related Officials," including the head of the Xinhua News Agency in Hong Kong, described as "equivalent to PRC Ambassador," and the head of China Resources, which was called "PRC's key foreign trading company." Virginia H. White, letter to Karen Frederickson, July 28, 1988 (Ex. 27). (For more about China Resources, see the sections of this report dealing with Lippo and with intelligence matters.)

The Fo Kuang Shan order also contributed an additional \$4,000 toward the PLC's expenses through its U.S. subsidiary, the International Buddhist Progress Society. *See* Check #1938 from International Buddhist Progress Society for \$4,000 to "Pacific Leadership," Dec. 28, 1988 (Ex. 28).

⁴⁴ Ex. 26, p. 2.

⁴⁵ Hom deposition, p. 56.

⁴⁶ *See* Al Gore, letter to Maria Hsia, May 23, 1989 (Ex. 29).

⁴⁷ Maria Hsia, letter to Albert Gore, Nov. 22, 1988 (Ex. 30) (recounting conversation with Gore during event at home of Pamela Harriman). This Harriman event was probably not the same event referenced in a document in the handwriting of Jeff Su — Maria Hsia's political assistant

co-founders such as James Riady and John Huang, if he would come join them in Asia. Indeed, Hsia advised him bluntly that “[i]f you decide to join this trip, I will persuade [sic] all my colleagues in the future to play a leader role in your future presidential race.”⁴⁸ Gore thereupon accepted, becoming the only national-level U.S. politician to join the PLC in Taiwan.

Thanks to the partial financial sponsorship provided by Hsing Yun, part of the Taiwan leg of the PLC’s Asia trip consisted of a visit to the Fo Kuang Shan temple in Kiaoshung. Attending with a delegation that included James Riady and his wife Aileen, John Huang and his wife Jane, Eddy Yang and his wife Jenny, Fred Hong, Howard Hom, and Maria Hsia, as well as Gore staff members Peter Knight and Leon Fuerth,⁴⁹ Senator Gore toured the Kiaoshung Monastery on January 11, 1989 and met with Hsing Yun.⁵⁰

— representing a fax transmission from Hsia to John Huang at Bank of Trade. This document describes a dinner party for 25-30 guests at Harriman’s house costing \$3,000 to \$5,000 per person with proceeds going to Friends of Al Gore. *See* Maria Hsia, memorandum to John Huang (undated) (Ex. 31). According to Howard Hom, Jeff Su only began working for Hsia in 1989, suggesting that the Harriman event referenced in Hsia’s November 22, 1988 letter was a prior fundraiser. *See* Hom deposition, pp. 77-78.

⁴⁸ Ex. 30. This letter is in the Committee’s possession only in “draft” form, but Howard Hom recalls that it was ultimately sent as written. *See* Hom deposition, p. 59.

⁴⁹ Pacific Leadership Council, attendance list for January 1989 trip (Ex. 32). Knight was then Gore’s chief of staff, while Fuerth was his foreign policy advisor. (This document was not a final list of participants, but Howard Hom recalls it being accurate apart from exceptions that are irrelevant for present purposes. *See* Hom deposition, pp. 61-62.)

⁵⁰ Indeed, during their meeting, Senator Gore and the Venerable Master discussed the Senator’s hopes to win the U.S. presidency. According to Hsing Yun, when

Senator Gore visited Fo Kuang Shan . . . I said to him, “You can become the president of the U.S.” He was excited upon hearing that and said, “I will visit you when I become the president.”

Hsing Yun, article in *Universal Gates Monthly* (May 1996) (Ex. 33, pp. 183-84) [translated from the Chinese by SA Becky Chan for the Governmental Affairs Committee].

This was the start of an extremely close relationship between Hsia and Senator Gore. After the January 1989 trip to Taiwan, Hsia became an active fundraiser for the Senator's reelection campaign.⁵¹ Over the next 22 months, until his reelection to the Senate in November 1990, for example, Hsia was involved with — with the help of her “political assistant” Jeffrey Su⁵² — numerous fundraising events for the Gore campaign, working in conjunction with campaign officials to refer her own friends and fundraising colleagues to Gore events in Southern California.⁵³ Hsia also helped organize Asian-Americans and Indo-Americans in Tennessee in support of Senator Gore's re-election, forwarding lists of affluent Chinese-Americans in Tennessee to the Senator's fundraising staff and helping publicize Indo-American events among her PLC fundraising colleagues.⁵⁴

⁵¹ She and her colleagues also did fundraising for other Senators. *See, e.g.*, DSCC Tally Sheet (1989-1990) (Ex. 34) (listing DSCC recipients including Senators Paul Simon, Tom Harkin, John Kerry, and Carl Levin); List of contributors to Sen. Howell Heflin dinner, Nov. 27, 1989 (Ex. 35). Gore, however, was the particular object of Maria Hsia's attentions.

⁵² Jeffrey Su was hired by Hsia in early 1989 — after her return from the trip to Taiwan — to help her run her various political activities and particularly to assist her in working for Senator Gore. Hom deposition, pp. 75 & 78.

⁵³ *See, e.g.*, Maria Hsia, memorandum to DSCC members, March 20, 1989 (Ex. 36) (list of upcoming Gore events); Debra Fried, memorandum to “Finance leadership and contacts / Friends of Al Gore,” July 27, 1990 (Ex. 37) (forwarding list of upcoming Gore fundraisers on West Coast in August 1990); Hari Lal, letter to Debra Fried, Aug. 14, 1990 (Ex. 38) (discussing Gore visit to Los Angeles); Handwritten memorandum on “Gore Reception 3/21” chaired by Eddy Yang at home of PLC founding member Tina Bow (otherwise undated) (Ex. 39); Jeff Su, fax transmission to John Huang, Aug. 6, 1990 (Ex. 40) (discussing “the Gore reception on Thursday”); Jeff Su, fax transmission to Hari Lal, Aug. 15, 1990 (Ex. 41) (discussing upcoming Gore events).

⁵⁴ *See* Ju Hong Taur, letter to Maria Hsia, Feb. 9, 1989 (translated by SA Becky Chan for the Governmental Affairs Committee) (Ex. 42) (forwarding list of Chinese persons for fundraising solicitation and political organization); Ex. 43 (Maria Hsia, fax transmission to John Huang, March 9, 1990 [RE: Reception for Senator Gore by Indo-American community]); Hari Lal, fax transmission to Maria Hsia, Oct. 1, 1990 [advising Hsia of Indo-American plans for Gore fundraisers in Tennessee]; *see generally* Hom deposition, pp. 78-81 (recounting Hsia's role in organizing Asian-Americans and Indian-Americans).

The PLC organized a fundraiser of its own for Senator Gore’s campaign on May 21, 1989 — a \$250-per-person event held at the California home of PLC founding member Tina Bow and consisting of a “private reception” with the Senator for PLC members and event sponsors followed by a “general reception.”⁵⁵ The event was chaired by Fo Kuangshan advisor Eddy Yang, but Hsia was one of its principal organizers, designing and mailing the invitations for the affair, helping arrange musical entertainment⁵⁶ and inviting “DSCC Members and Friends” to participate, advising them that Senator Gore was “a likely candidate for president in 1992.”⁵⁷

Nor were Hsia and her colleagues above using Fo Kuang Shan monastics in their fundraising for Senator Gore. Underlining the PLC’s reciprocal commitments with the Senator, for example, Eddy Yang helped arrange for several monks and nuns from the Temple to attend the May 21, 1989 Gore fundraiser.⁵⁸ This event reportedly raised nearly \$20,000 for Senator Gore; he accordingly wrote a thank-you letter afterwards to one of the monastics saying that he “deeply appreciates your

⁵⁵ Maria Hsia, letter to “DSCC Members and Friends,” May 5, 1989 (Ex. 44) (discussing May 21 fundraiser); R.S.V.P. return and from Maria Hsia’s computer file, May 3, 1989 (Ex.45) (indicating \$250 solicitation for event “sponsors”).

⁵⁶ *See* Ex. 45 (draft invitations from Maria Hsia’s computer file, with handwritten edits, and handwritten draft of invitation); Maria Hsia, letter to Johan Sendjaja, May 3, 1989 (Ex. 46) (discussing arrangements for band and public address system at May 21 Gore reception); Handwritten notes from Maria Hsia’s file detailing preparations for May 21 reception (Ex. 47).

⁵⁷ Ex. 44.

⁵⁸ Hom deposition, p. 67 (“[T]he temple sent a team of monks and nuns to the event, and as I recall, someone spoke as the representative of that [organization], and because of that connection or linkage, Eddy Yang was an event chair because of his connection initially with the Buddhist temple that helped subsidize the trip to Taiwan.”).

support and the support of your congregation.”⁵⁹ Senator Gore thereafter thanked Hsia for her support, assuring her that this assistance was vital because

my involvement in the Presidential race over the past two years has delayed my efforts to raise money for the 1990 campaign and left our coffers empty for the upcoming race. Your contribution at the early stage of this effort has helped to replenish our account and will allow me to build a strong organization...⁶⁰

In addition to Gore-specific fundraising events, the DSCC’s political-contribution “tally” system proved to be a valuable tool for Hsia as she swung her newfound fundraising clout behind Senator Gore, representing as it did a convenient way around limits on “hard” campaign finance contributions.⁶¹ Rather than limit their overall support of a particular candidate to the \$2,000 level specified for total individual “hard” donations, contributors to the DSCC arranged to earmark much larger “soft” money contributions for particular candidates. As Howard Hom remembered it,

The contributor donated under the name of DSCC, and DSCC could do with it as they wished, but as the group found out during the Leo McCarthy campaign for the U.S. Senate in 1988, . . . we could request that all or a portion of any donation be tallied or allocated to use in a particular race. So we could say we want 90 percent to go to Al Gore and 10 percent to go to, say, Leo McCarthy.⁶²

⁵⁹ William Rempel, Alan Miller & Henry Weinstein, “Buddhist Temple repaid some DNC Donations,” *Los Angeles Times*, May 23, 1997, p. A1.

⁶⁰ Ex. 29.

⁶¹ By federal law, contributions to individual candidates for Congress are limited to \$1,000 per contributor for the primary and general election campaigns, for a total of \$2,000 per contributor.

⁶² Hom deposition, p. 71; *see also id.*, p. 88 (noting that “the DSCC soft money tally would be separately allocated” from “the individual contribution to the 2,000-per-year max[imum]”).

In other words, donors would give money to the DSCC itself in large, unregulated “soft” money contributions, so that the DSCC could funnel designated amounts of each personal total to designated candidates with exactly the same result as if the \$1,000 limitations had never existed. This system was ultimately found to be illegal — with the result that the DSCC paid \$75,000 in fines to the FEC⁶³ — but for several years this “tally” system proved an invaluable means of skirting federal election laws.

After returning from the PLC’s Taiwan trip, Hsia also worked for Senator Gore’s re-election campaign through this DSCC tally system.⁶⁴ As documented in files of her fundraising activity kept by Hsia and Howard Hom, for example, a donor named Michael Reyes became the frequent target of her efforts to earmark his DSCC contributions for Gore’s re-election campaign.⁶⁵ In the period before the 1990 elections, the DSCC “tallied” at least \$29,500 to Senator Gore’s campaign.⁶⁶ Senator Gore was well aware of this work she undertook on his behalf. As he put it in a letter he wrote to Hsia in January 1989, for example,

⁶³ See Federal Elections Commission, Matter Under Review 3620, conciliation agreement, Aug. 11, 1995.

⁶⁴ Ex. 34 (“RE: DSCC tally to Senator Gore / Please check to see if the DSCC did in fact tally money to Sen. Gore per our request”); Jeff Su, fax transmission to Debra Fried, Aug. 22, 1990 (Ex. 48) (“John Huang will be attending the DSCC 1990 Fall Dinner. Maria will contact John and tell him [to] tally his \$1,500 to Sen. Gore.”).

⁶⁵ See, e.g., Maria Hsia, fax transmission to Michael Reyes, Dec. 2, 1988 (Ex. 49) (“I would like to tally your contribution to Senator Al Gore if you have no objections since his reelection is coming.”).

⁶⁶ Senator Paul Simon received even more DSCC money, being the recipient of \$36,500 in DSCC “tallies.” Other recipients included Senators Howell Heflin (\$7,500), Carl Levin (\$2,500), Max Baucus (\$1,000), John Kerry (\$1,000), and Tom Harkin (\$4,000). See Ex. 34.

I wanted to thank you for your generosity in crediting by DSCC tally with the checks from Michael Reyes and Tony Hsu. I have sent letters to both thanking them and crediting you as the contact. Thanks so much; it will help a great deal as we move into the 1990 Senate campaign. You are a wonderful friend.⁶⁷

Another letter in December 1990 similarly thanked Hsia for “your generous contribution to the Democratic Senatorial Campaign Committee, which you had tallied to me.”⁶⁸ Throughout the 1989-90 re-election campaign, Hsia remained in close contact about fundraising matters with Senator Gore and campaign officials such as Debra Fried of Friends for Al Gore.

All of this fundraising support was, of course, part of the rather explicit bargain Hsia had struck with Senator Gore in inviting him to visit Taiwan in November 1988. Hsia approached her political fundraising with clear objectives in mind,⁶⁹ and Senator Gore’s presidential ambition appears to have been her most favored long-term prospect. As Hsia put it in a note to one DSCC contributor, whom she was at that point trying to persuade to “tally” an additional \$5,000 to Friends of Al Gore, help for Senator Gore was important because he had been “willing to take the Lead role to travel [to] Asia and [was] willing to work with us on a long term relationship for his future presidency.”⁷⁰

⁶⁷ Al Gore, letter to Maria Hsia, Jan. 31, 1989 (Ex. 50); *see also* Ex. 48 (“Senator Gore should call Michael [Reyes] and ask him to tally the remaining \$5,000 to his campaign once it is paid.”).

⁶⁸ Albert Gore, letter to Maria Hsia, Dec. 5, 1990 (Ex. 51).

⁶⁹ Hsia advised Michael Reyes in January 1989, for instance, that \$5,000 should be allocated to Senator Paul Simon, “since he sits on the immigration sub-committee [and] he will be a very helpful source on any immigration related issues.” A final \$5,000 should be reserved, she said, for “any [other] Senator who is responsive to our group’s needs.” Maria Hsia, fax transmission to Michael Reyes, Jan. 18, 1989 (Ex. 52).

⁷⁰ *Id.*

In fact, never a woman to say with circumspection what might be put bluntly, Hsia made no secret of her expectations even when writing to the Senator himself. Four days after the PLC's first fundraiser for Al Gore on May 21, 1989, she wrote to tell him that

We were so happy that you were able to spend some time with members of the Asian Pacific American community here in Los Angeles. . . . I appreciate your willingness to provide an opportunity for people to get to know you better. I would also like to see you become one of the senators closest to the Asian Pacific community. But for that to occur, we need time and a special commitment from each other. If you share the same sentiments, please allow my colleagues and I a role in developing this relationship.⁷¹

Because of her work in the immigration services business, U.S. immigration law was another area of great personal interest to Hsia. By February 1989, a major immigration reform bill was being prepared in Congress,⁷² ultimately to become the Immigration Act of 1990. As this bill moved through the legislature during 1989, it became the subject of much lobbying by immigration services providers such as Hsia and Howard Hom. As finally adopted, the Act included a number of provisions of great value to such persons. First, the Act restricted deportation and provided work authorization for the spouse or unmarried children of legalized aliens.⁷³ Second, the Act contained new provisions for what would become known as "investor immigrants" (persons who received

⁷¹ Maria Hsia, letter to Albert Gore, May 25, 1989 (Ex. 53).

⁷² Tom Griffith & Steve Huefner, letter to Christopher A. Ford, Aug. 18, 1997 (Ex. 54) (detailing legislative history of Immigration Act of 1990).

⁷³ P.L. 101-649, § 301 [104 Stat. 4978, 5029]. As a result, an immigration services provider could use one alien's legal residence in the United States as a lever with which to secure visas (and ultimately legal residency) for other members of his or her family. This often enabled immigration services companies to develop an expanding "tree" of paying customers out of a single initial client contact. Hom and Hsia did a lucrative business by such expedients; according to Hom, losing the family reunification preferences "would have wiped out a certain percentage of the client base." *See* Hom deposition, p. 120.

special visa preferences by virtue of their willingness to invest and/or create jobs in the United States)⁷⁴ and “multinational executive” immigrants (persons employed by a foreign corporation seeking to work for it in the United States).⁷⁵ Third, the Act created an entirely new visa category for “religious workers” who belong to “religious denomination[s] having a bona fide nonprofit, religious organization in the United States” and who seek entry in order to work here for their denomination.⁷⁶

All three of these visa categories were to become lucrative parts of Hsia’s business, especially after her association with the Fo Kuang Shan order gave her and Howard Hom the job of handling immigration work for foreign members of the Order affiliating with its U.S. branches such as the Hsi Lai Temple in Hacienda Heights, California.⁷⁷ Hsia had long believed that her political activity

⁷⁴ P.L. 101-649, § 121(b)(5) [104 Stat. 4978, 4989-90].

⁷⁵ *Id.*, § 121(b)(1)(C) [104 Stat. at 4988]. By the nature of these two categories, it was difficult to be both poor and eligible for their visa preferences. Moreover, demand for such visas far exceeded their supply — necessitating the development of a lottery system and leading clients eagerly to seek any chance for a perceived special advantage. *See* Hom deposition, pp. 128-129.

⁷⁶ P.L. 101-649, § 151 [104 Stat. at 5004-05]. Similar provisions applied for temporary work visas, and these religious worker nonimmigrants were exempted from the overall visa caps established elsewhere in the legislation. *Id.* at §§ 201(b)(1)(B) & 209 [104 Stat. at 4981 & 5027]. For a discussion of the new religious worker rules, *see* Hom deposition, pp. 132-33.

⁷⁷ When Hom and Hsia stopped living together, Hsia took the Temple’s immigration business with her, making it a major part of her work with Hsia & Associates. Hom deposition, pp. 160-61; Deposition of Man Ho, Aug. 6, 1997, pp. 51-54; Deposition of Yi Chu, Aug. 7, 1997, p. 24; *see also* Deposition of Matthew Gorman, Sept. 23, 1997, pp. 140-43; (Ex. 5)5 (collection of illustrative immigration documents and invoices for services rendered sent from Hsia & Associates to Temple in 1996); Deposition of Man Ya Shih, Aug. 20, 1997, p. 16 (recounting that she obtained green card through Hsia at Temple’s expense); Deposition of Siuw Moi Lian, Aug. 20, 1997, p. 11 (same); Deposition of Huei-Tsan Huang, Aug. 20, 1997, pp. 11-12 (discussing Hsia’s role in obtaining a green card for her and in performing immigration services for Temple). According to Hsia’s assistant at Hsia & Associates, Matthew Gorman, work for the Temple made up somewhere between 20 and 35 percent of Hsia’s immigration business. Gorman deposition, pp. 75-76. Maria Hsia even handled immigration matters for Venerable

provided important intangible advantages in her immigration services work, feeling that if she were “politically active,” her clients would conclude that she had “more ability and more power to help them in their cases.”⁷⁸ In 1989, with an immigration bill pending in Congress that could provide a vehicle for visa provisions of such value to her business, Hsia set about to use her political ties to reap more concrete benefits as an immigration law lobbyist.

One of the principal objects of Hsia’s attentions — and fundraising support — in this respect was Congressman Bruce Morrison of Connecticut, who was the immigration bill’s sponsor in the House of Representatives and the author of the religious worker and “employment-based” immigrant provisions so important to Hsia.⁷⁹ Morrison was in the middle of a difficult (and ultimately unsuccessful) gubernatorial bid in Connecticut, and badly needed the funds with which Hsia and her PLC colleagues set out to provide him. Significantly, among other things, the PLC organized a fundraiser for Morrison at the Hsi Lai Temple in Hacienda Heights on April 22, 1990.⁸⁰ It was

Master Hsing Yun himself. *See* Notice of Entry of Appearance as Attorney or Representative for Hsing Yun, Oct. 28, 1996 (Ex. 56).

⁷⁸ Ex. 3, p. 28. According to Hsia, political involvement occasionally could lead to help with specific cases. Congressman Howard Berman’s office, she claimed, helped her develop ways to improve clients’ chances in certain visa lotteries. Ex. 10, p. 26. Similarly, when Hsia asked for help with a particular immigration case from DSCC “tally” recipient Senator Paul Simon, “he made a phone call in front of me to the immigration commissioner in Washington, D.C.” Maria Hsia, deposition in *Hsia v. Hom*, Ca. Super. Ct., No. BC 059523, May 10, 1994, p. 78 (Ex. 57). Senator Gore also apparently helped Hsia on at least one occasion, by referring a particular case to her. *See Hom* deposition, pp. 117-118; Leon Fuerth, memorandum to Maria Hsia, Dec. 14, 1989 (Ex. 58) (with attachments).

⁷⁹ *See* Ex. 54, p. 2.

⁸⁰ *See* Ex. 59 (Jeffrey Su, fax transmission to Pat Andrews, April 20, 1990 [enclosing press release announcing upcoming Morrison event at Hsi Lai Temple]; Invitation to Asian-Pacific American Friends of United States Congressman Bruce Morrison event at Hsi Lai Temple [giving price as “\$500 per couple / \$300 per person”]). Hsia was even able to turn Morrison’s Connecticut defeat

apparently not the first time Hsia had used the Temple for a political fundraising event,⁸¹ and it was not to be the last.

Part of Hsia's lobbying effort during the summer of 1989 — at the same time she and her colleagues were pushing DSCC donors to earmark their unregulated "soft" money contributions to Senators Simon and Gore — involved traveling to Washington to lobby legislators in person on the pending immigration bill. According to Hom, the delegation Hsia took to Washington even included a pair of nuns from the Hsi Lai Temple. The presence of these monastics was intended to remind members of Congress of

the Al Gore sponsorship to the Temple in Taiwan and what the group — the Temple — did subsequently to let other Senators know that if they came on board on the immigration issue and other Asian issues,

to her advantage by hiring him as an immigration "consultant" immediately after the election of 1990 — for a fee of \$10,000 a month for six months. *See* Ex. 57 (containing as sub-exhibit Consultancy Agreement between Bruce Morrison and Maria Hsia, Jan. 22, 1991). As Hsia explained it, Morrison had written "the business provision which provides for the jo[b] creating investor category," and "[t]he definition of 'new entrepreneur' will depend on Congressional intent and the implementation of the new regulations." Maria Hsia, fax transmission to Jamie Yang, Nov. 26, 1990 (Ex. 60). Who better, therefore, to have on one's masthead and payroll as an immigration consultant?

⁸¹ Eddy Yang apparently organized a fundraiser at the Hsi Lai Temple for Leo McCarthy's campaign. *See* Debbie McConville, memorandum to Maria Hsia, undated (Ex. 61) (listing "Southern California Event Fundraising" and indicating that "Eddie Yang Event / Budhist [sic] Temple Event" raised \$10,450). Howard Hom also recalled that one of Senator Paul Simon's several visits to the Hsi Lai Temple had been a fundraiser. *See* Hom deposition, pp. 87-88; *cf.* Maria Hsia, fax transmission to Floyd Fithian, June 23, 1990 (Ex. 62) (describing Simon "event" at Temple); Paul Simon, letter to Maria Hsia, Jan. 22, 1990 (Ex. 63) (thanking Hsia for "our visit to the Hsi Lai Temple"); Hom deposition, p. 172 (recalling that when Hsia described meeting with politician as "event" it was most probably a fundraiser). Other officials may also have benefited from fundraisers at the temple. *Cf.* Jeff Su, fax transmission to "Elka," Jan. 22, 1990 (Ex. 64) (discussing opportunity for California State Controller Gray Davis to meet with "Master Hsing Yun and potential supporters at Hsi Lai Temple").

then they could expect the same reciprocation . . . [through] [t]rips to Taiwan and fundraising in the U.S.⁸²

Hsia's group met with a number of U.S. Senators and Representatives on July 10 and 11, 1989.⁸³

One of her contacts on this trip was with Senator Gore, who joined staff members Peter Knight and Leon Fuerth in meeting with Hsia on July 10. Her notes of the meeting recount that they discussed his trip to Taiwan with her in 1989, and that Gore “want[ed] to involve [himself] in the Asian Community more for [the] future.”⁸⁴ With regard to a particular amendment to the immigration bill — which had by that point been reported out of the Senate Judiciary Committee's Subcommittee on Immigration and Refugee Affairs and was rapidly approaching a full Senate vote⁸⁵ — “he said [he had] no problem for co-sponsorship.”⁸⁶ The amendment they were discussing — the “family unity” provisions that were so important to Hsia's immigration practice — was, in fact, adopted by the Senate two days later. Senator Gore was one of its co-sponsors.⁸⁷

⁸² Hom deposition, p. 153.

⁸³ See Maria Hsia, Schedule for July 10-11, 1989 (Ex. 65). See also, e.g., Ex. 7 (noting that Hsia “organized and led delegations...to visit Washington, D.C. during debate on the bill in an effort to preserve the family reunification categories”).

⁸⁴ Maria Hsia, notes of meetings with Senators, July 10, 1989, p. 2 (Ex. 66); cf. Maria Hsia deposition in Hsia v. Hom, Ca. Super. Ct., No. BC059523, apparently July 6, 1993, pp. 87-93 (Ex. 67) (discussing lobbying trip and taking handwritten notes).

⁸⁵ See Ex. 54, p. 1.

⁸⁶ Ex. 66, p. 2.

⁸⁷ Ex. 54, pp. 1-2. On her Washington lobbying trip, Maria Hsia employed a simple system of “grading” Senators on an A-to-F scale based upon their responsiveness to her concerns; Senator Gore received an “A”. Ex. 66, pp. 1-2. In fact, to some extent, Hsia apparently coordinated her lobbying on the pending immigration bill with Senator Gore's office — as well as the offices of Senator Simon and Representative Howard Berman — in promoting her favored legislative provisions. See Maria Hsia, fax transmission to Leon Fuerth, Jan. 24, 1989 (Ex. 68); see also

Writing to Senator Gore upon her return to Los Angeles, Hsia thanked him for “your support on the recent immigration bill,” adding that “[o]n behalf of the Pacific Leadership Council and the communities we represent, I thank you for all that you have done.”⁸⁸ Writing back to her in response, Senator Gore described himself as being “pleased to have been able to assist you” on the immigration bill. “Without your superb contribution,” he said, “it would have been much more difficult to find my way in these matters. I continue to value your good counsel.”⁸⁹ As John Huang himself later described it to then-Vice President Gore, “you worked very hard on immigration issues; you worked very hard for us.”⁹⁰

In addition to more conventional communications thanking her for her fundraising on his behalf,⁹¹ Senator Gore sent effusive handwritten comments informing Hsia and Howard Hom, for

generally Hom deposition, pp. 142-43.

⁸⁸ Maria Hsia, letter to Albert Gore, July 17, 1989 (Ex. 69).

⁸⁹ Albert Gore, letter to Maria Hsia, Aug. 28, 1989 (Ex. 70). By all accounts, Maria Hsia appears to have been a significant “player” in crafting the Immigration Act of 1990 — to the point that Senator Paul Simon, one of the bill’s sponsors, later presented her with the pen used to sign the bill into law. *See* Hom deposition, pp. 158-159. So important was this pen, in turn, to Hsia that she reportedly broke into the offices of her law “partner” Arnold Malter in July 1995 in order to retrieve it after their business relationship collapsed. *See* Monterey Park Police, Crime Report for file number 95-4822, July 15, 1995 (Ex. 71) (describing theft of pen as recounted by Malter to police).

⁹⁰ John Huang, opening remarks at Vice Presidential event in Santa Monica, Sept. 27, 1993, *on* WHCA audiotape of Santa Monica event, Sept. 28, 1993 [transcription by Government Affairs Committee staff]. The White House Communications Agency apparently misdated this tape: the event actually occurred on September 27. *See* John Huang, letter to Jack Quinn, Oct. 7, 1993 (Ex. 72) (“We enjoyed meeting you again on the following Monday, September 27 in Los Angeles. Vice President Gore was just super.”).

⁹¹ *See, e.g.*, Ex. 51; Albert Gore, letter to Maria Hsia, Dec. 20, 1990 (Ex. 73); Ex. 29; Ex. 50; *cf.* Invitation sent to Maria Hsia for reception for swearing-in ceremony on January 3, 1991 (Ex. 74).

example, that “I cannot thank you enough. You two are great friends. See you soon. Al.”⁹² Hsia’s involvement with Senator Gore extended even to helping him prepare his book *Earth in the Balance*: as Gore Chief of Staff Peter Knight wrote to Hsia in March 1991,

The materials you got for Al’s book on the environment were perfect. Thanks so much for taking the time to do it. He would have been lost without your efforts because the chapter on religion and the environment is integral to his work.⁹³

As will be described below, the close relationship between Maria Hsia and Al Gore continued at least through 1996.⁹⁴

Considerable publicity has surrounded the illegal reimbursement of DNC donors by the Hsi Lai Temple in connection with an April 1996 fundraiser organized by Hsia and Huang for Vice President Gore. The pattern for this conduct, however, was actually set at least three years earlier. Both Hsia and Huang were involved in similar donation-laundering at least as early as 1993, when

⁹² Albert Gore, letter to Maria Hsia, Oct. 2, 1990 (Ex. 75); *see also* Albert Gore, handwritten letter to Maria Hsia, undated (Ex. 76).

⁹³ Peter Knight, letter to Maria Hsia, March 6, 1991 (Ex. 77).

⁹⁴ Even apart from DNC fundraising and the April 29, 1996 Gore fundraiser, for example, Maria Hsia interceded with Deputy Chief of Staff David Strauss to procure a congratulatory message for the annual conference of the Buddha’s Light International Association (BLIA) in Paris in August 1996. *Compare* Maria Hsia, letter to David Strauss, July 2, 1996 (asking for help in obtaining congratulations message), *with* Albert Gore, letter to Maria Hsia, July 26, 1996 (extending congratulations) (both Ex. 78). Hsia went so far as to invite President Clinton to attend the conference, but he declined — opting instead merely to send a congratulatory message of his own. *See* Ex. 79 (Maria Hsia, letter to Bill Clinton, June 13, 1996, Stephanie Streett & Ann Hawley, letter to Maria Hsia, Sept. 25, 1996; Bill Clinton, letter to Buddha’s Light International Association, Aug. 2, 1996). As recounted by Temple official Man Hua during the deposition of her colleague Man Ho, Hsia became involved in trying to arrange such favors for the BLIA after learning that Yah Lin (“Charlie”) Trie was attempting to do so. Protecting her exclusive relationship with the Temple by telling Hsing Yun that Trie was “not reliable,” Hsia thereupon set about arranging this herself. *See* Man Ho deposition, pp. 54-68.

they laundered contributions in connection with a meeting they helped arrange between Vice President Gore's chief of staff and the head of a company reportedly linked with the intelligence apparatus of the People's Republic of China. On Thursday, September 23, 1993, Huang wrote two checks to the DNC — for \$15,000 each — drawn against accounts at Lippo Bank held in the name of two U.S. subsidiaries of James Riady's Lippo Group, for which Huang still worked. Four days later, on September 27, he wrote a third \$15,000 check on the account of a third Lippo subsidiary.⁹⁵ Two days later, Hsia arranged for three nuns from the Hsi Lai Temple to write checks to the DNC totaling \$5,000.⁹⁶ All of these donations were illegal, representing money from foreign sources or money from “straw donors” illegally reimbursed by another party.

Huang's three DNC checks came from Lippo subsidiaries — Hip Hing Holdings, San Jose Holdings, and Toy Center Holdings — each of which had negative income at the time the checks were written.⁹⁷ In other words, they were losing money; the money for his three \$15,000 contributions actually came from Lippo accounts overseas.⁹⁸ With regard to the \$5,000 in DNC

⁹⁵ See Ex. 80 (Hip Hing Holding check #2626 for \$15,000 on September 23, 1993; San Jose Holdings check #1692 for \$15,000 on September 27, 1993; Toy Center Holdings check #1458 for \$15,000 on September 23, 1993).

⁹⁶ See Ex. 81 (DNC check tracking form for Pi Hsia Hsiao donation of \$2,000 on September 27, 1993; DNC check tracking form for Hsin Kuang Shih donation of \$2,000 on September 27, 1993; DNC check tracking form for Hsiu Chu Lin donation of \$1,000 on September 27, 1993). Each check tracking form lists Maria Hsia as the solicitor of the donation described. On the “memo” portion of Pi Hsia Hsiao's check is written “Maria Hsia.”

⁹⁷ See Ex. 82 (Hip Hing Holdings, Ltd., Income statement for period ending December 31, 1993; San Jose Holdings, Inc., Income statement for period ending December 31, 1993; Toy Center Holdings of Ca., Inc., Income statement for period ending December 31, 1993). For more information, see the section of this report dealing with John Huang and Lippo.

⁹⁸ Since the money clearly did not come from the U.S. operations of these companies, this was a violation of federal election law. See FEC A.O. 1992-16, Fed. Election Camp. Fin. Guide (CCH)

donations from Temple monastics arranged by Hsia, each nun was reimbursed that same day for their donations, through checks written on the Temple's general expenses account by the Temple's treasurer, Yi Chu.⁹⁹

On Friday, September 24, 1993, the day after Huang's first \$30,000 in laundered Lippo donations to the DNC, Huang escorted Shen Jueren, the head of a company called China Resources,¹⁰⁰ to the White House for a meeting with Vice President Gore's top advisor, his then-chief of staff Jack Quinn.¹⁰¹

¶ 6059, at 11,811, June 26, 1992.

⁹⁹ See Ex. 83 (IBPS check #8086 for \$2,000 to Pi-Hsia Hsiao on September 27, 1993; IBPS check #8087 for \$2,900 to Hsing Kuang Shih on September 27, 1993; IBPS check #8088 for \$1,000 to H.C. Lin on September 27, 1993). Temple treasurer Yi Chu's lay name Tsui-Hsueh Hsueh appears on the checks. (The reimbursement to Hsing Kuang Shih was apparently \$900 more than her \$2,000 DNC donation because she also needed to be reimbursed for \$900 in unrelated expenses she had also borne on the Temple's behalf.) All three monastic "straw donors" received letters from DNC Chairman David Wilhelm thanking them for their "participation in the Los Angeles Vice Presidential Dinner on September 27." See Ex. 84 (David Wilhelm, letter to Pi-Hsia Hsiao, Oct. 15, 1993; David Wilhelm, letter to Hsing Kuang Shih, Oct. 15, 1993; David Wilhelm, letter to Hsiu Chu Lin, Oct. 15, 1993). Federal election law prohibits funneling donations through third parties. See 2 U.S.C. § 441f.

¹⁰⁰ China Resources is owned by the government of the People's Republic of China, and is a major business partner of the Riady-owned Lippo Group. For more information about China Resources, see the sections of this report on John Huang's activities at Lippo Bank.

¹⁰¹ See Ex. 72 ("I want to thank you for having taken the time out of your busy schedule to receive myself, Chairman Shen Jueren and his assistant, Miss Liang of China Resources Group on September 24 at your office."); U.S. Secret Service WAVES list for July 7 through September 24, 1993 (Ex. 85) (showing Huang appointment to enter White House complex on September 24 with approval to enter both the Old Executive Office Building and the East Wing). There is a possibility that the Vice President may have also met Shen Jueren that day. The Committee has an audiotape of a September 27, 1993 meeting for Asian-Americans in Santa Monica, California, at which an individual introduced himself to the Vice President by giving his name and saying, "we met, just last Friday, in your office." The Vice President responded, "Yes, of course, we just spoke." The Friday before this meeting in Santa Monica was the day Shen Jueren met with Quinn in the White House complex. The individual's name is not clearly intelligible, but prior to this brief conversation a word that may be "Shen" can be heard being spoken in the background

The involvement of Huang and Hsia with Shen Jueren and China Resources raises an interesting and possibly troubling issue. As is detailed elsewhere in this report,¹⁰² the Committee has learned that Hsia has been an agent of the Chinese government, that she has acted knowingly in support of it, and that she has attempted to conceal her relationship with the Chinese government. In view of this information — coupled with information suggesting that Huang may have had a direct financial relationship with the Chinese government¹⁰³ — the Committee has examined carefully the longstanding efforts by Huang and Hsia¹⁰⁴ to develop close ties to U.S. politicians and cultivate influence in the U.S. political system. This information might raise concerns regarding Huang and Hsia’s involvement with China Resources’ Shen Jueren in 1993.

Public sources have for some years linked China Resources to the PRC’s intelligence apparatus, describing it as an important source of what in U.S. espionage parlance is known as “non-official cover”¹⁰⁵ for espionage and other intelligence-related activities, *e.g.*, covert influence

of the audiotape. White House Communications Agency audiotape of September 27, 1993 Santa Monica event (misdated “September 28, 1993”).

¹⁰² See chapter of report entitled, “The China Connection.”

¹⁰³ See *id.*

¹⁰⁴ Nor should it be forgotten that James Riady himself played a significant role in trying to put U.S. Senators in contact with the head of China Resources in connection with the PLC’s Asia trip during the 1988-89 period. See *supra* note 43. As recounted more fully in the report chapter, “The China Connection,” the Committee has learned from recently-acquired information that James and Mochtar Riady have had a long-term relationship with a Chinese intelligence agency.

¹⁰⁵ Intelligence officers operating under “non-official cover” are known as “NOCs,” and if caught will not have the protection of diplomatic immunity. See, *e.g.*, Norman Polmar & Thomas B. Allen, *Spy Book: The Encyclopedia of Espionage* (New York: Random House, 1997), p. 400.

operations. As one Defense Intelligence Agency employee put it in a book published in 1994, for example,

[Chinese] [c]ase officers make extensive use of commercial covers. For example, a vice president of the China Resources Holding Company (*Hua Ren Jituan*) in Hong Kong is traditionally a military case officer from Guangzhou. This officer coordinates the collection activities of other intelligence personnel operating under Hwa Ren [China Resources] cover.¹⁰⁶

The increased prestige in commercial and political circles that could be derived from access to U.S. politicians would presumably be of no small value to such an operation.

The link between Hsia and the Chinese government might also cast into a different light certain other episodes in Hsia's history of political activity in the United States.¹⁰⁷ Among these would be her ties to Ted Sioeng, who as described elsewhere, has worked, and perhaps still works, on behalf of the Chinese government.¹⁰⁸ Sioeng sat at the head table next to Vice President Gore and Hsia at the April 29, 1996 Hsi Lai Temple fundraiser. The Committee has received information that

¹⁰⁶ Nicholas Eftimiades, *Chinese Intelligence Operations* (Naval Institute Press, 1994), p. 80.

¹⁰⁷ For example, Hsia apparently considered lobbying for the People's Republic of China on a commercial basis after the end of her relationship with Howard Hom, and claimed to have become increasingly involved with the PRC in immigration matters after 1992. See Ex. 57 (containing as sub-exhibit Bruce Morrison, memorandum to Maria Hsia, April 14, 1991); Ex. 3, p. 58; see also Hom deposition, p. 184. Though she claimed in a November 1997 interview that "I have never had a single conversation with any Chinese government official about U.S. politics," Hsia also invited four Chinese consular officials to a reception in honor of Senator Tim Wirth in 1991, and hosted delegation of Chinese government officials on a trip to Washington during the summer of 1996. Compare David Johnston, "Files on China Embarrass F.B.I. and Reno, and Miff Subject," *New York Times*, Nov. 15, 1997, p. A12 (quoting Hsia), with Jeff Su, memorandum to Paul DeNino, May 8, 1991 (Ex. 86) (listing consular officials at Wirth event), and Gorman deposition, pp. 119-23; Matthew Gorman, sworn statement to Governmental Affairs Committee, Aug. 27, 1997 (Ex. 87, p. 3, ¶ 17) (discussing visit to Washington).

¹⁰⁸ See chapter, "The China Connection."

Hsia worked with Sioeng and Huang to solicit contributions from Chinese nationals in the United States and abroad for Democratic causes.¹⁰⁹

Quite apart from these individuals' ties to the Chinese government, however, it should be clear by now that if one is to understand the Hsi Lai Temple's involvement in the 1995-96 election cycle, and even the issue of Vice President Gore's knowledge with regard to the Temple fundraiser of April 29, 1996, one must first understand the breadth and depth of the relationship between Maria Hsia and Vice President Gore. What the Vice President knew and when he knew it is not a question, in other words, that may be understood in isolation from the past. Rather, it must be placed in context, as the outgrowth of the long history of Vice President Gore's dealings with Maria Hsia, John Huang, James Riady, and Hsing Yun's Fo Kuang Shan Buddhist order.

As the preceding pages indicate, the relationship between these five key figures was complex, but it was one firmly grounded in mutual advantage and revolving around political fundraising. Understood from the perspective of its participants, therefore, this history places the events of 1996 in a new light. Ultimately, given the elaborate system of reciprocal assistance among them and the considerable financial investments the PLC's founding members had made in Vice President Gore's political career, the Vice President had to have understood that any DNC event organized at the Temple by Maria Hsia and John Huang could only really be for one purpose.

Despite the political salience of this "knowledge" issue, however, the Temple incident involves much more than simply a single fundraiser unwisely attended by the Vice President and unlawfully

¹⁰⁹ See the section of this report entitled "The China Connection."

supported by Hsia and Temple monastics who had become accustomed to relying upon Hsia to steer their illegal financial support to U.S. politicians. The DNC donation-laundering arranged by Huang and Hsia in April 1996 was part of a broader pattern dating back at least to their collaboration in the Shen Jueren affair of September 1993. In some sense, the Temple episode of 1996 may even be understood as the product of a mutually-reinforcing relationship between Huang and Hsia that began in the late 1980s with their involvement in the PLC and their fundraising for the DSCC.

Huang's appointment as a DNC fundraiser in early 1996 brought Huang and Hsia back together in ways familiar to both of them, and with higher stakes than ever. As we have seen, Huang had used Lippo resources to help Hsia make up for unanticipated financial shortfalls in her political fundraising.¹¹⁰ By early 1996, the tables had turned, and Hsia had an opportunity to return the favor by greatly expanding what had hitherto been a relatively small-scale Hsi Lai Temple donation-laundering scheme into a potent fundraising machine for the Clinton/Gore campaign. The infamous Hsi Lai Temple fundraiser of April 1996 is thus only part of this story; over the course of 1996, Hsia and Huang would raise over \$100,000 in laundered Temple donations to help keep Bill Clinton and Al Gore in the White House.

II. A PATTERN OF DONATION-LAUNDERING: 1993-1996

Hsia's involvement with illegally laundering money from the Hsi Lai Temple to U.S. politicians began at least as early as June 1993, with a donation made by Hsia herself to a longtime

¹¹⁰ See *supra* text accompanying footnote 24.

Hsia fundraising beneficiary, California Secretary of State March Fong-Eu. Hsia wrote a \$500 check to March Fong-Eu's campaign in June 1993, having been earlier given \$500 for that purpose by the Temple's treasurer.¹¹¹ In September 1993, as indicated previously, Hsia also arranged to launder \$5,000 of the Temple's money through three monastic "straw donors" to the DNC for an event with Vice President Al Gore.¹¹²

The September 1993 episode involving the Vice President set a pattern for Temple donation-laundering that would persist until the 1996 elections: Hsia would telephone a nun at the Temple named Man Ho,¹¹³ who served as the Temple's chief administrative officer during this period, to inform her that she needed a certain sum of money in connection with a particular political fundraising event or political campaign. Man Ho would then pass along this request to the Temple's Abbess or Abbot of the time. The Abbot or Abbess would, in turn, approve a check request form prepared by Man Ho, who would give this completed form to Yi Chu, the Temple's treasurer.¹¹⁴

¹¹¹ See Ex. 88 (Form 490, List of Contributions Received by March Fong Eu Campaign Committee '94 recording \$500 contribution by Maria L. Hsia in June 1993; IBPS check #7562 for \$500 to Maria Hsia on June 4, 1993); Man Ho deposition, p. 214 (testifying that Temple supported March Fong-Eu).

¹¹² See *supra* text accompanying notes 96-99.

¹¹³ Because Temple officials and monastics invoked their Fifth Amendment privilege against self-incrimination when asked about their involvement in DNC fundraising, the Committee granted immunity to five nuns in exchange for their testimony: Man Ho, Yi Chu, Man Ya Shih, Hueitsan Huang, and Siuw Moi Lian.

¹¹⁴ See Testimony of Man Ho, Sept. 4, 1997, pp. 48-49; Man Ho deposition, pp. 85-86 (testifying that September 1993 was first time Hsia asked Man Ho for political donations); *id.*, p. 92 (affirming repetition of same pattern with other contributions); *id.*, pp. 199 & 211-13 (discussing pattern of calls from Hsia).

Unbeknownst to Man Ho until late in 1996,¹¹⁵ upon receiving the check request for political contributions, Yi Chu would then approach Temple monastics or devotees and ask them to write personal checks.¹¹⁶ The total amount raised by means of these checks would be the total figure Hsia had requested and the amount that Man Ho had indicated on the check request form approved by the Abbot or Abbess.¹¹⁷ Either the person who wrote the check or Yi Chu would place the name of the political recipient on the payee line of the check.¹¹⁸

At about the same time she received each personal check from the monastics whom she had solicited, Yi Chu would write a check for the identical amount, drawn on the Temple's general expenses account and made payable to the ostensible political contributors.¹¹⁹ Hsia typically stopped by the Temple to pick up the monastics' donation checks from Yi Chu or Man Ho, while Yi Chu gave the Temple's reimbursement checks to the donors so that they could cover the cost.¹²⁰

¹¹⁵ Man Ho deposition, pp.199-201.

¹¹⁶ Yi Chu deposition, pp. 69, 79, 84, & 92 (discussing pattern). The reimbursement was not, however, unknown to Hsia: as noted above, she herself was reimbursed for a donation to March Fong-Eu in June 1993.

¹¹⁷ Man Ho deposition, pp. 196-97.

¹¹⁸ Yi Chu testified that she did not know what "DNC" stood for until the scandal broke in the press; she believed that few, if any, of the individual reimbursed donors had a much understanding of to whom, or for what purpose, their checks were being written. Yi Chu deposition, pp. 77-79; Testimony of Chu, Sept. 4, 1997, pp. 46-47.

¹¹⁹ Yi Chu deposition, pp. 86-87.

¹²⁰ *See, e.g., id.*, pp. 39-42 & 46 (recounting that reimbursement checks were needed because monastics often could not afford contributions otherwise).

The money used for these laundering transactions belonged to the Hsi Lai Temple as a whole: the reimbursement checks were all drawn upon the Temple's "general expenses" account, which was in turn filled exclusively from an account into which flowed donations made to the Temple and the Fo Kuang Shan order by faithful Buddhist devotees in all walks of life.¹²¹

The general pattern was simple: Hsia would select the recipient politician, ask the Temple for money, and the Temple would funnel its own institutional funds through monastic straw donors to that politician's campaign. This scheme served Hsia and a number of U.S. politicians quite well until the 1996 elections, by which point Hsia was using it so frequently that Yi Chu complained to Man Ho that the requests left her too little time to find monastic donors who could be reimbursed.¹²²

Hsia's laundering of Temple donations to U.S. politicians continued in 1994 with two separate episodes in which money was funneled to Julia Wu, a local school board candidate. In the first such instance, a monastic named Jou Sheng donated \$2,000 to Wu's campaign in March 1994 and was reimbursed the next day by Yi Chu.¹²³ According to the Temple's attorneys, another \$3,000 was also laundered to Julia Wu at this time, being passed through Pi-Hsia Hsiao and Nancy Mao, who were

¹²¹ *Id.*, pp. 86-88; Yi Chu testimony, p. 47. Though some monastics did keep so-called "Futien accounts" at the Temple, their money being held by the institution in a form of private banking and segregated for each monastic's own use, these Futien accounts were not used to reimburse political donations. *See generally* Yi Chu deposition, pp. 16-19; Yi Chu testimony, pp. 50-51.

¹²² *See* Man Ho testimony, p. 48; Yi Chu deposition, p. 84. As a result, for the last known Temple reimbursement — in October 1996 — Yi Chu simply gave Man Ho five blank Temple checks and left it for Man Ho to solicit the donors/reimbursees herself.

¹²³ *See* Ex. 89 (Jou Sheng check #187 for \$2,000 to Friends of Julia Wu on March 2, 1994; IBPS check #8880 for \$2,000 to cash on March 3, 1994, endorsed on reverse by Jou Sheng).

also reimbursed with checks numbered sequentially with that written to Jou Sheng.¹²⁴ The Temple laundered money to Wu's campaign again in May 1994, with at least \$2,000 passing through Temple Abbess Hsing Kuang Shih, as well as an additional \$3,000 through Pi-Hsia Hsiao and Hsiu Chu Lin.¹²⁵ In July 1994, Pi-Hsia Hsiao gave \$900 to the campaign of another local California official, Los Angeles County Tax Assessor Kenneth Hahn, and was reimbursed by Yi Chu for her efforts.¹²⁶ Hsia and the Temple returned to national-level fundraising in September 1994 by laundering \$5,000 to the campaign of Senator Edward Kennedy.¹²⁷

The first recipient of laundered Hsi Lai Temple money arranged by Maria Hsia in 1995, was apparently the DNC itself, in connection with a Clinton/Gore event in September for which Hsia

¹²⁴ See Ex. 90 (IBPS check #8881 for \$2,000 to cash on March 3, 1994, endorsed on reverse by Pi-Hsia Hsiao; IBPS check #8882 for \$1,000 to "cash NANCY MAO" on March 3, 1994, endorsed on reverse by Nancy Mao). Interestingly, Man Ho — normally the conduit for Hsia's requests — claimed not to have been involved in the Julia Wu donations, leaving open the question of which other present or former Temple officials have been involved in Hsia's donation-laundering schemes.

¹²⁵ See Ex. 91 (Hsing Kuang Shih check #587 for \$2,000 to Julia L. Wu on May 4, 1994; IBPS check #9167 for \$2,000 to Hsing Kuang Shih on May 6, 1994); see also Ex. 92 (IBPS check #9168 for \$2,000 to Pi-Hsia Hsiao on May 6, 1994; IBPS check # 9169 for \$1,000 to Hsiu Chu Lin on May 6, 1994).

¹²⁶ Ex. 93 (Pi Hsia Hsiao check #174 for \$900 to Committee to Re-elect Assessor Kenneth Hahn on June 15, 1994; IBPS check #9397 for \$900 to Pi-Hsia Hsiao on July 1, 1994).

¹²⁷ See FEC Info database printout of individual contributor data (Ex. 94) (listing total of \$2,000 in contributions by Pi-Hsia Hsiao to Kennedy for Senate, recorded by campaign on September 15, 1994); *id.* (listing \$2,000 to Kennedy for Senate from Ling-Tzen Huang, recorded on same date); *id.* (listing \$1,000 to Kennedy for Senate from Hsiu-Chu Lin, recorded on same date); Ex. 95 (Pi-Hsia Hsiao check #179 for \$2,000 to Kennedy for Senate on September 6, 1994; Hsiu Chu Lin check #365 for \$1,000 to Kennedy for Senate on September 6, 1994; IBPS check #1034 for \$2,000 to Pi-Hsia Hsiao on September 6, 1994; IBPS check #1035 for \$2,000 to Ling-Tzen Huang on September 6, 1994; IBPS check #1036 for \$1,000 to cash, endorsed on reverse by Hsiu Chu Lin).

reportedly raised \$5000 in unlawful Temple donations.¹²⁸ Los Angeles County Supervisor Don Knabe and Senator Edward Kennedy also each received \$3,000 in laundered Temple donations arranged by Hsia in 1995.¹²⁹

As noted, however, Hsia's fundraising scheme for funneling Temple money through "straw donors" expanded dramatically in 1996 after John Huang went to work at the DNC and began to organize Democratic fundraisers among California's Asian community. It was not by coincidence, therefore, that Hsia's biggest foray yet into Temple donation-laundering occurred in conjunction with the first significant event Huang organized for the DNC: a fundraiser with President Clinton at the Hay-Adams Hotel in Washington in February 1996. For this event, Hsia telephoned Man Ho at the

¹²⁸ See Ex. 96 (IBPS check #2727 for \$2,500 to Hsiu Chu Lin on September 20, 1995; IBPS check #2729 for \$2,500 to cash, endorsed on reverse by what appears to be the name "Tong Sew Long"; Jou Sheng bank records for 09/09/95 through 10/10/95 showing deposit of \$2,500 on September 22, 1995 and debit of \$2,500 on September 28 with cashing of check #215). (On their "memo" lines, the IBPS check to Tong Sew Long bears the Chinese characters for "public relations" — the term Maria Hsia used for political fundraising. See Yi Chu deposition, p. 106. The check to Hsiu Chu Lin is strangely annotated with Chinese characters and the English phrase "birthday gift.") According to the Temple's attorneys, at least two additional \$2,500 checks were filled out by Fo Kuang Shan monastics in connection with this event — but the payee line was left blank and Maria Hsia subsequently diverted it for her own purposes, filling it out not to the originally-intended political recipient but to a company called Shen He International, Inc. See Ex. 97 (Gin F.J. Chen check #405 for \$2,500 on September 20, 1995; Jou Sheng check #215 for \$2,500 on September 20, 1995; IBPS check #2728 for \$2,500 to Jou Sheng on September 20, 1995).

¹²⁹ See Ex. 98 (Shiwen W. Teh a.k.a. Shiwen Wang check #1772 for \$1,500 to Kanabe for Supervisor on October 25, 1995; Knabe for Supervisor, list of Monetary Contributions Received for 10/01/95 through 12/31/95 period, indicating \$1,500 contributions from Hsiu Chu Lin and Shiwen Teh, both recorded on November 11, 1995; IBPS check #2846 for \$1,500 to cash, endorsed on reverse by Melissa Wang [a.k.a. Shiwen Teh] on October 24, 1995; IBPS check #2847 for \$1,500 to Hsiu Chu Lin on October 24, 1995; Federal Election Commission, Selected Receipts & Expenditures (95-96), showing \$1,500 in contributions on December 1, 1995 from Hsiu-Chu Lin and Shiwen W. Teh; Hsiu Chu Lin check #623 for \$1,500 to Edward M. Kennedy; Shiwen W. Teh a.k.a. Shiwen Wang check #1776 for \$1,500 to Edward M. Kennedy on November 13, 1995; IBPS check #2923 for \$1,500 to Melissa Wang [a.k.a. Shiwen Teh] on November 10, 1995; IBPS check #2924 for \$1,500 to Hsiu Chu Lin on November 10, 1995).

Temple to ask for \$25,000 in contributions,¹³⁰ an amount which was duly collected from nine monastic straw donors who were thereafter reimbursed.¹³¹ Don Knabe also continued to receive the Temple's support during 1996. At the end of February, Hsia made a \$1,500 donation to Don Knabe's campaign, being duly reimbursed by the Temple for her pains.¹³²

At least four additional episodes of donation-laundering, occurred between the April 1996 event and the general elections in November 1996. In July 1996, Hsia contacted Man Ho at the Temple, informing the nun that Hsia would need \$50,000 in order to purchase two tickets to an upcoming fundraising luncheon with President Clinton at a private home. Hsia subsequently changed

¹³⁰ Man Ho deposition, pp. 196-97; Yi Chu deposition, pp. 69-73.

¹³¹ See Ex. 99 (DNC Check Tracking Form for Hsiu Chu Lin check #667 for \$3,000 to DNC on February 17, 1996; IBPS check #3286 for \$3,000 to Hsiu Chu Lin on February 14, 1996; DNC Check Tracking Form for Jou Sheng check #223 for \$3,000 to DNC on February 16, 1996; IBPS check #3294 for \$3,000 to Jou Sheng on February 16, 1996; DNC Check Tracking Form for Pi-Hsia Hsiao check #194 for \$2,500 to DNC on February 16, 1996; IBPS check #3300 for \$2,500 to Pi-Hsia Hsiao on February 16, 1996; DNC Check Tracking Form for Suh-Jen Wu check #107 for \$3,000 to DNC on February 16, 1996; IBPS check # 3298 for \$3,000 to Suh-Jen Wu on February 16, 1996; DNC Check Tracking Form for Hsing Kuang Shih check #600 for \$3,000 to DNC on February 16, 1996; IBPS check #3295 for \$3,000 to Hsin Kuang Shih on February 16, 1996; DNC Check Tracking Form for Gin F.J. Chen check #486 for \$3,000 to DNC on February 17, 1996; IBPS check #3299 for \$3,000 to Gin F.J. Chen on February 16, 1996; DNC Check Tracking Form for Hsin Cheng Shih check #137 for \$3,000 to DNC on February 19, 1996; IBPS check #3297 for \$3,000 to Hsing Cheng Shih on February 16, 1996; DNC Finance Executive Summary of \$2,500 contribution from Hsiao Jie Su on February 19, 1996; IBPS check #3301 for \$2,500 to Hsiao Jie Su on February 16, 1996; Hsiao Jie Su check #304 for \$2,500 to DNC; DNC Check Tracking Form for Jen Chin Hsueh a.k.a. Gary Hsueh check #269 for \$2,000 to DNC on February 16, 1996; IBPS check #3296 for \$2,000 to Jen-Chin Hsueh on February 16, 1996. The Temple's computerized accounting records list this series of payments by consecutively numbered checks as "No Name" payments. See Hsi Lai Temple, Transaction Detail by Account (February 1996) (Ex. 100).

¹³² Ex. 101 (IBPS check #3318 for \$1,500 to Maria Hsia on February 29, 1996 with "memo" notation apparently reading "re: contribution of Don Knabe" [sic]; Knabe for Supervisor, List of Monetary Contributions Received for period 02/11/96 through 03/09/96, indicating \$1,500 contribution recorded on March 7, 1996).

her plans, however, deciding instead upon a less expensive \$5,000-per-person dinner at the Century Plaza Hotel.¹³³ In the end, two Temple monastics donated \$5,000 each for the Century Plaza event, — thereby making it possible for Hsia to become one of its co-chairs, a status contingent upon raising \$10,000¹³⁴ — and were reimbursed by the Temple.¹³⁵

In September 1996, two Temple monastics donated at total of some \$6,500 to the DNC and were reimbursed by the Temple.¹³⁶ Also that month, Hsia and her assistant, Matthew Gorman, arranged for the nun Pi-Hsia Hsiao to donate \$1,000 to Don Knabe's re-election campaign,¹³⁷ a donation which was reimbursed by the Temple on the same day it was made.¹³⁸ Finally, Hsia arranged

¹³³ Man Ho deposition, pp. 202-06; Yi Chu deposition, pp. 75-76.

¹³⁴ *See* Invitation to July 22, 1996 Presidential Gala (undated) (Ex. 102) (noting that status of “Co-Chair for the Presidential Gala” requires one personally to contribute \$5,000 or to raise \$10,000).

¹³⁵ Ex. 103 (Bih-Yueh Jeng check #158 for \$5,000 to DNC on July 22, 1996; Wang Chi Rung check #135 for \$5,000 to DNC on July 22, 1996; IBPS check #3894 for \$5,000 to Wang Chi Rung on July 17, 1996; IBPS check #3890 for \$5,000 to Bih-Yueh Jeng on July 17, 1996).

¹³⁶ Ex. 104 (FECInfo database printout of individual contributor data, showing \$1,500 contribution to DNC from Hsiu Chu Lin on October 2, 1996; IBPS check #4119 for \$1,500 to Hsiu Chu Lin). According to Yi Chu, Chee Kien Koh (a.k.a the Rev. Hai Kai) also donated to the DNC at this time, being reimbursed in cash (\$3,000) and with a check made out to cash (\$2,000). *See* Yi Chu deposition, pp. 79-82; IBPS check #4118 for \$2,000 to cash, with “memo” notation reading “Chee Kien Koh” (Ex. 105). It may be, however, that Koh failed to pass the \$2,000 on to its intended political recipient; he returned \$2,000 to the Temple in two \$1,000 payments in December 1996 and January 1997. *See* IBPS, Chee Kien Koh deposit check records (Ex. 106).

¹³⁷ Ex. 107 Matthew Gorman, letter to Peter Kelly, Sept. 18, 1996 [forwarding Pi-Hsia Hsiao check #197 for \$1,000 to Don Knabe for L.A. County Supervisor dated September 18, 1996]; Knabe for Supervisor, List of Monetary Contributions Received for period 10/01//96 through 10/19/96 listing \$1,000 contribution from Pi-Hsia Hsiao). Pi-Hsia Hsiao's check was filled out improperly, however, and had to be reissued. *See* Matthew Gorman, letter to Dardy Chen, Oct. 8, 1996 (Ex. 108) (forwarding reissued check, also dated September 18, 1996).

¹³⁸ IBPS check #4120 to Pi-Hsia Hsiao for \$1,000 on September 18, 1996 (Ex. 109).

for \$5,000 in Temple funds to be laundered to the campaign of Representative Patrick Kennedy for a fundraiser held in Los Angeles on October 5, 1996. For this event, the occasion on which an exasperated Yi Chu finally refused to arrange to funnel the money through monastic “straw donors”¹³⁹ — Hsia used blank Temple checks to reimburse herself and four friends for their \$1,000 contributions to Kennedy’s campaign.¹⁴⁰ These laundered donations — along with another \$100 check from Hsia’s friend Richard Choi — were handed to Rep. Kennedy and a campaign aide as they emerged back onto the street at the end of a visit to the Hsi Lai Temple on October 5.¹⁴¹

Counting the Temple fundraiser in April 1996, which yielded at least \$65,000 in unlawful Temple donations, this elaborate system of donation-laundering, in which Temple officials marshaled

¹³⁹ See Yi Chu testimony, p. 48.

¹⁴⁰ The other reimbursees were Hilary Goldstone and Donald Burns, two Los Angeles attorneys and longtime Kennedy family fundraisers, as well as Hsia’s business colleague Stephen Zhou and his wife May Lin Zhou. See Ex. 110 (Federal Election Commission, Selected List of Receipts & Expenditures [95-96], listing \$1,000 contributions on October 5, 1996 by Burns, Goldstone, Hsia, and the Zhous; IBPS check #4193 for \$1,000 to Hilary Goldstone on October 5, 1996; IBPS check #4194 for \$1,000 to Donald Burns on October 5, 1996; IBPS check #4195 for \$1,000 to Maria Hsia on October 5, 1996; IBPS check #4196 for \$1,000 to May Lin Zhou on October 5, 1996; IBPS check #4197 for \$1,000 to Stephen Zhou on October 5, 1996).

Stephen Zhou was the head of Zarks International, a company located in the same office spaces as Hsia & Associates. Zhou also leased office space to T&W Arts & Crafts — the U.S. subsidiary of a company from Hangzhou, China, called Yalong Economics & Trade Corporation — as well as apparently serving as an officer of T&W. See Ex. 111 (Commercial Lease between Zarks International, Inc. and T&W Arts & Crafts dated Feb. 14, 1996; Projected Organizational Chart of T&W Arts & Crafts (USA), Inc. (undated), listing Stephen Zhou as vice president).

¹⁴¹ Having received this money just outside the door of the Temple apparently enabled Representative Kennedy to claim later that “our story could not be compared to the vice president’s because we never did a fundraiser at the temple.” See John Mulligan, “Grand Jury probes Buddhist temple fundraising,” *Providence Journal-Bulletin*, Oct. 20, 1997, pp. A1 & A6; John Mulligan, “Kennedy explains his rationale in returning money raised at temple,” *Providence Journal-Bulletin*, Sept. 9, 1997, p. A4. All of these funds have apparently been returned.

funds to political candidates and causes chosen by Maria Hsia, may ultimately have funneled \$146,400 to various U.S. political candidates. Of this total, some \$116,500 went to the DNC in support of the Clinton/Gore ticket.

III. THE HSI LAI TEMPLE FUNDRAISER OF APRIL 29, 1996

The idea to hold a DNC fundraising event at the Hsi Lai Temple appears to have had its beginnings in March 1996, when Hsia persuaded Venerable Master Hsing Yun to meet with Vice President Gore by visiting the White House. Although Temple officials apparently understood ahead of time that some White House trip was in the offing, arrangements for this visit seem to have been hastily concluded at the last minute while Hsing Yun and a delegation of Temple monastics were in New York City on other business.¹⁴² On March 14, 1996, Hsing Yun received a telephone call from Hsia in California, informing him that the White House meeting had finally been arranged. Temple administrator Man Ho thereupon made flight arrangements to take Hsing Yun's delegation to Washington the next day, and obtained for the White House the social security numbers of those who would meet with the Vice President.¹⁴³ The Master was reportedly initially reluctant to rearrange his schedule in order to accommodate this last-minute change, but he was ultimately persuaded by

¹⁴² Man Ho deposition, pp. 94-95 & 101.

¹⁴³ *Id.*, pp. 88-96 & 110.

Hsia's entreaties and by those of former Temple abbess Hsing Kuang Shih enlisted by Hsia to help in this regard.¹⁴⁴

John Huang played the central role in setting up the March 15 meeting with Vice President Gore. Even before Hsing Yun's delegation left for New York on March 10, Huang had telephoned Man Ho in order to obtain the Master's social security number for the anticipated White House visit.¹⁴⁵ It was Huang who requested the Hsing Yun meeting,¹⁴⁶ and he both worked with Gore scheduler Kim Tilley in arranging it¹⁴⁷ and wrote the Vice President's briefing notes.¹⁴⁸

On the morning before the March 15 meeting, Hsia spoke personally with Vice President Gore by telephone from the delegation's room at the Hay-Adams Hotel. Although the Vice President had already agreed to the meeting, and the Temple delegation was at that point waiting at their hotel, the

¹⁴⁴ Man Ho deposition, p. 96; *see also* Transcript of Hsing Yun interview by Governmental Affairs Committee Staff, June 17, 1997, p. 2 (Ex. 112) (recounting that Hsia had called him in New York to urge that he meet with Gore, and that although "reluctant to go" Hsing Yun has "said, 'O.K., I'll go.'"). (This transcription of the Committee staff's interview with Hsing Yun was transcribed by Stuart Chandler, who attended the meeting apparently on behalf of the Temple's attorneys.)

¹⁴⁵ Man Ho deposition, p. 99. Maria Hsia called Man Ho later — when the Temple delegation was in New York — to obtain social security numbers from the other members of the delegation who would be visiting. *Id.*, p. 110.

¹⁴⁶ John Huang, memorandum to Albert Gore, March 15, 1996 (describing meeting as having been "requested by John Huang"). Hsing Yun suggested that the meeting had been the idea of John Huang and Maria Hsia. *See* Transcription of Hsing Yun interview, p. 2.

¹⁴⁷ *See* John Huang, memorandum to Kim Tilley, April 11, 1996 (Ex. 113) ("You know we have together arranged Master Hsing Yun to visit the Vice President Gore [sic] in the White House in March of this year."). The Vice President's schedule also listed John Huang as the staff contact for the Hsing Yun meeting. Gore schedule for March 15, 1996 (Ex. 114).

¹⁴⁸ John Huang, fax transmission to Eric Anderson, March 15, 1996 (Ex. 115) (forwarding briefing notes for Vice President "prepared by John Huang").

Vice President's staff had become concerned over the potential political implications of a visit from Hsing Yun. Taiwan was then in the midst of its 1996 presidential election campaign, which involved, among others, an independent Buddhist candidate named Lian Chien, who had been endorsed by Venerable Master Hsing Yun. Vice President Gore's foreign policy advisors worried that meeting Hsing Yun could be seen as an implicit endorsement of Dr. Chien, and feared that the Master would somehow interject Taiwanese politics into the White House meeting.¹⁴⁹ As Gore national security staffer John Norris later recalled,

After we became aware of the scheduling proposal [for the Hsing Yun meeting], I checked with State and NSC (Taiwan Coordination Staff) to get information on Hsing Yun's background. Neither office thought there was a high risk that the meeting would lead to an incident in our relations with either China or Taiwan.¹⁵⁰

So concerned was Vice President Gore that despite having received such a sanguine assessment from the State Department and the NSC, he called Hsia personally at the Hay-Adams for additional reassurances. As recounted by Man Ho, who was in the room as Hsia spoke with him, the Vice President "was afraid that [M]aster might talk to him about political issues or [M]aster might bring some message [from] Lian Chen [sic]." Hsia assured Gore that Hsing Yun "was not going to talk

¹⁴⁹ Man Ho deposition, pp. 106-07; Deposition of Kimberly Tilley, June 23, 1997, p. 138.

¹⁵⁰ John Norris, memorandum, Oct. 16, 1996 (Ex. 116) (recounting "my recollection of the two VP events involving Hsing Yun, the Taiwan Buddhist leader, and the DNC").

[about] any political issue with the Vice President.”¹⁵¹ The group then went to the White House to meet with Vice President Gore, leaving Man Ho and one Temple devotee behind at the hotel.¹⁵²

The meeting involved little more than exchanges of greetings and pleasantries and a “photo op” with the Vice President. Hsing Yun, accompanied by three other Temple monastics¹⁵³ as well as both Hsia and Huang, met with the Vice President for approximately ten minutes.¹⁵⁴ At the end of this brief meeting, the Master invited Gore to visit the Hsi Lai Temple.¹⁵⁵ As to when this visit might occur, Hsing Yun told the Committee staff that Gore had indicated that he would be in Los Angeles at some point within the next six or seven weeks, *i.e.* in late April 1996.¹⁵⁶

¹⁵¹ Man Ho deposition, pp. 105-07; *see also* Ex. 116 (“[Y]ou or (Bill [Wise]) expressed concern about the sensitivities to Scheduling. As a result of those conversations, Hsia called the VP and assured him the meeting would be nothing more than a courtesy call.”). Tilley deposition, pp. 139-40 (recalling hearing about a talk between Gore and Maria Hsia).

¹⁵² Man Ho deposition, p. 111. As used in this report, “devotees” of the Hsi Lai Temple are lay persons who nonetheless worship there regularly and who take part in various Temple activities. By contrast, Temple “monastics” are those who formally take religious vows and join the Fo Kuang Shan order itself (*i.e.*, monks and nuns) — shaving their heads, adopting distinctive monastic clothing, and usually living in the Temple complex.

¹⁵³ Yumei Yang, Ke-Chun Hong, and Abbess Suh-Jen Wu (a.k.a. Tzu Jung).

¹⁵⁴ Ex. 113; Ex. 114.

¹⁵⁵ Ex. 112, pp. 4-5; *see also* Ex. 113.

¹⁵⁶ Memorandum of Interview of Hsing Yun, June 17, 1997, p. 2 (“At the close of this meeting the Master invited Gore to visit the Hsi Lai temple in California. In reply, Gore indicated that he would be traveling to California ‘in the near future’ and would be glad to accept the invitation. No specific date was discussed but the Master recalled that Gore indicated he would be in LA within 6-7 weeks — that is, late April.”). (In contrast to the document prepared by Chandler purporting to be a near-verbatim transcription of the interview, this memorandum was prepared by Governmental Affairs Committee Staff.)

Within a week of the White House meeting, Maria Hsia sent a letter to Leon Fuerth at the White House, advising him that “Master Hsing Yun . . . could be very helpful for Vice President Gore’s re-election.”¹⁵⁷ The next day, Hsia wrote the Vice President himself, informing him that

John Huang has asked me to help with organizing a fund-raising lunch event, with your anticipated presence, on behalf of the local Chinese community. After the lunch, we will attend a rally at the Hsi Lai Temple where you will have the opportunity to meet representatives from the Asian-American community to visit again with Master Hsing Yun. The event is tentatively scheduled for April 29¹⁵⁸

Though this letter did not make clear whether the “fund-raising lunch event” being organized by Huang and Hsia would take place at the Temple or at some other unspecified location, unambiguous arrangements were worked out over the next few days to have both the fundraising luncheon and the rally at the Temple. By April 4, the DNC had apparently prepared invitations to a Vice Presidential luncheon at the Hsi Lai Temple,¹⁵⁹ and Hsia’s assistant Gorman had opened a file specifically identifying April 29, 1996 as the date of the Vice President’s anticipated visit. This file was entitled “Vice President Gore Hsi Lai event April 29, 1996 — DNC Fundraiser.”¹⁶⁰ By April 8, the Vice

¹⁵⁷ Maria Hsia, letter to Leon Forth [sic], March 22, 1996 (and earlier drafts dated March 20 & 22) (Ex. 117); *see also* Progress Sheet from Hsia & Associates (Ex. 118) (indicating “sent final draft letters to Gore & Forth [sic]” on March 24, 1996).

¹⁵⁸ Maria Hsia, letter to Albert Gore, dated March 23, 1996 (and earlier drafts dated March 20 & 23) (Ex. 119). It should be noted, however, that neither Hsia’s March 22 letter to Fuerth nor her March 23 letter to the Vice President was produced to the Committee by the White House in the voluminous Temple-related records delivered to the Committee pursuant to subpoena.

¹⁵⁹ Maria Hsia, fax transmission to Ted Marino, April 4, 1996 (Ex. 120) (forwarding invitation on DNC letterhead for Vice Presidential event at Hsi Lai Temple).

¹⁶⁰ Ex. 121 (Photocopy of file header opened on April 4, 1996; Maria Hsia, memorandum to Matthew Gorman of April 4, 1996 instructing him to “open file under V.P. Gore Hsi Lai Temple

Presidential Protective Division of the U.S. Secret Service had begun planning for Gore's April 29 luncheon in Los Angeles.¹⁶¹

In late March 1996, Hsia notified the Master and others at the Temple that the Vice President would visit on April 29, 1996. Immediately, Hsia set up meetings to plan the event. Hsia requested, and it was accordingly decided that a luncheon would be served in the Temple's dining hall.¹⁶² Both Man Ho and Yi Chu testified that in one of these early planning meetings at the Temple, the Abbess told to the monastics in attendance that it would be "acceptable" or "appropriate" for the monastics to contact devotees of the Temple to indicate that they could attend the luncheon with the Vice President and, for \$5,000, have their photograph taken with him.¹⁶³

After one or two early planning meetings at the Temple, and early in the month of April, both the Abbess and Hsia left the U.S. for Taiwan, where they remained until very shortly before the April 29 event. In their stead, Hsia and the Abbess left Matt Gorman and Man Ho, their respective assistants, to take care of the day-to-day planning and preparation for the event.¹⁶⁴ Most of Gorman's

Visit 4/29/96"); Gorman deposition, pp. 20-22 (confirming opening file on April 4, 1996).

¹⁶¹ U.S. Secret Service, VPPD Scheduling Document, April 8, 1996 (Ex. 122) (including William Pickle, letter to Sen. Fred Thompson, Sept. 2, 1997 [explaining document]).

¹⁶² Man Ho deposition, pp. 117-19.

¹⁶³ Man Ho testimony, pp. 27-28; *see also* Man Ho deposition, pp. 125-31. In her deposition testimony, Man Ho recalled that the Abbess might perhaps have said that the price for a photograph was \$5,000 *per couple*. Nor is it clear who suggested to the Abbess that she encourage contributions in connection with the event, or how she arrived at this \$5,000 figure.

¹⁶⁴ Man Ho testimony, pp. 29-30; Man Ho deposition, pp. 132-33; *see also* Gorman deposition, pp. 23 & 25.

responsibilities consisted of arranging for the invitation of special VIP guests, who did not have to pay to attend the DNC fundraiser — at Hsia’s direction.¹⁶⁵ Among the nonpaying guests Hsia invited to the event were two senior officials from the INS, Joseph Thomas and Daniel Hesse, and a federal judge from Los Angeles, Robert Tagasaki.¹⁶⁶ The VIP guest list also included Monte Perez, chairman of the “Nationwide Citizenship Association,” and Tom Byun, who headed the “Radio Korea Citizenship Nationwide Program.”¹⁶⁷

At some point in mid- or late-April, Hsia telephoned Gorman in order to request that he solicit money from a number of individuals for the Gore luncheon. Many of these individuals apparently did not speak English well, if at all, and Gorman left the solicitation of these persons to another Hsia & Associates employee, Betty Luk, because he did not speak Chinese particularly well.¹⁶⁸ Among these persons were Huang Guang Miao, president of the U.S. subsidiary of a Chinese company, and Joseph

¹⁶⁵ Gorman deposition, pp. 22-25.

¹⁶⁶ These three men were to have their invitations specially hand-delivered. *See* Ex. 123 (Matthew Gorman, fax transmission to Richard Choi, April 22, 1996 (forwarding to Choi copies of invitations that were to be hand delivered to Thomas, Hesse, and Tagasaki); Matthew Gorman, fax transmission to Man Ho, April 12, 1996 (advising Man Ho that Thomas, Hesse, and Tagasaki will attend as “V.I.P. guests”). It is not clear, however, that Judge Tagasaki actually attended. Senator Daniel Inouye and Congressman Matthew Martinez were also invited, but neither official attended. *See* Ex. 124 (Matthew Gorman, fax transmission to Mary Lou, April 12, 1996 [inviting Inouye]; Matthew Gorman, fax transmission to Rev. Man Ho, April 12, 1996 [containing invitation for Martinez]).

¹⁶⁷ *See* Ex. 125 (Richard J. Soon Choi, letter to Matthew Gorman, April 24, 1996 [responding to confirm acceptance of invitation by Perez and Byun]; Matthew Gorman, fax transmission to Richard Choi, April 24, 1996 [advising Man Ho of attendance of Byun and Perez]).

¹⁶⁸ Gorman deposition, pp. 47-48; Matthew Gorman, memorandum to Betty Luk (Ex. 126) (giving list of names for solicitation: “Professor Lo,” Jennifer Tsai, Huang Guang Miao, Celia Wu, Joseph Chen, Zhou Buo, Chan Ya Shery, & Jeffrey Lin).

Chen,¹⁶⁹ the head of a Taoist religious organization called the Great Tao Foundation of America and secretary-general of the World I-Kuan Tao Headquarters in Taiwan.¹⁷⁰

Gorman was not the only person soliciting funds for the Vice President's Temple fundraiser, however. In addition to funds solicited independently by Huang and perhaps Hsia,¹⁷¹ Temple monastics, acting on the suggestion by Abbess Tzu Jung that it would be "appropriate" for them to do so, solicited a number of donations to the DNC from Temple devotees in advance of the Vice President's visit. The checks thereby obtained totaled \$32,500.¹⁷²

In addition to money openly raised from Temple devotees, Man Ho and Yi Chu also helped arrange for two devotees anonymously to give a total of \$10,000 in cash to the DNC. This money was deposited by the two anonymous donors into the Temple's bank account, and three Temple

¹⁶⁹ Chen had written John Huang earlier in April to ask if Vice President Gore could visit the anniversary celebrations of the Great Tao Foundation after stopping at the Hsi Lai Temple on April 29. "If you could make arrangements so that the vice-president after the luncheon at the Hsi Lai Temple could say a few congratulatory remarks at our ceremony between 2:00 and 2:30 P.M., and pose for photos with all attending Taoists," Chen wrote, "the Great Tao Foundation will respectfully donate \$25,000 toward the campaign funds." Joseph Chen, letter to John Huang, April 10, 1996 (Ex. 127) [translated by Michael Yan for the Governmental Affairs Committee]. The Vice President did not ultimately attend Chen's event on April 29, 1996, but Maria Hsia did arrange to bring Chen to an event with President Clinton and Vice President Gore in Los Angeles in September 1995. *See* Maria Hsia, letter to Joseph Chen, Sept. 19, 1995 (Ex. 128) (forwarding details of event to Chen, with handwritten note "Thank you very much for everything that you've done!").

¹⁷⁰ *See generally* Gorman deposition, pp. 49-52.

¹⁷¹ *See infra* note 202.

¹⁷² *See* Ex. 129 (Photocopied checks from files of Hsia & Associates, reproducing, *inter alia*: \$5,000 check from K-Stone Industries, Ltd.; \$5,000 check from Micro International U.S.A., Inc.; \$7,500 check from Ying-Chiu Tien; and \$2,500 check from Min Hsiang Teng; \$5,000 check from Shu Woei Huang and Jan Yueh Lian Huang; \$5,000 check from Henry J. Chen & Jessie F. Chen; \$2,500 check from Marina Chiu); *see also* Man Ho deposition, pp. 159-60 (recalling that "Chiu Tien" and Marina Chu were on list summarizing Temple-solicited pre-event donations).

monastics were chosen to make corresponding contributions to the DNC.¹⁷³ These three nuns were thereupon reimbursed by Yi Chu out of the Temple's general expenses account.¹⁷⁴

Also as part of the preparations for the Vice President's fundraiser, Huang visited the Hsi Lai Temple on three different occasions during April 1996 prior to Gore's arrival. On the last of these pre-event visits, on April 28, the day before the luncheon, Huang, Hsia, and DNC fundraiser Maeley Tom worked together in a room at the Temple, using their cellular telephones to call guests and potential guests for the next day's event. As Gorman recalled it, they spoke to these persons in Chinese, and though he was far from fluent,

My impression was that they were kind of soliciting contributions, soliciting guests maybe. I got the feeling they were kind of — they were kind of urgent in trying to get like as many people as possible. Maybe they had not gotten as much — raised as much contributions [sic] as they'd wanted¹⁷⁵

¹⁷³ These persons were Jou Sheng, Shiwen Teh (a.k.a. Melissa Wang), and Hsin Cheng Shih. *See* Yi Chu deposition, pp. 94-95 & 96-98; Man Ho deposition, pp. 149-50. At least two of them, Jou Sheng and Hsin Cheng Shih, are Fo Kuang Shan nuns.

¹⁷⁴ *See* Ex. 130 (DNC Check Tracking Form for Jou Sheng check #227 for \$5,000 to DNC on April 16, 1996; IBPS check #3523 for \$5,000 to Jou Sheng on April 16, 1996; DNC Check Tracking Form for Shiwen Teh check #1808 for \$2,800 to DNC on April 16, 1996; IBPS check #3521 for \$2,800 to Melissa Wang [a.k.a. Shiwen Teh] on April 15, 1996; DNC Check Tracking Form for Hsin Cheng Shih check #141 for \$2,200 to DNC on April 18, 1996; Hsing Cheng Shih bank records for period 03/21/96 through 04/19/96 [indicating cash deposit of \$3,000 on April 18, 1996]); Yi Chu deposition, pp. 100-01 (confirming reimbursement of these three individuals). Each of the DNC check tracking forms for these straw donations credit Hsia with having solicited the contribution.

¹⁷⁵ Gorman deposition, pp. 77-78; *see also* Ex. 87, p. 2, ¶ 12.

At one point, Huang's telephone ran out of battery power, and he began to pick up a nearby wired telephone — only to be stopped by Maeley Tom, who admonished him that he should not use the Temple's telephones.¹⁷⁶

During this last-minute telephone effort by Huang, Hsia, and Tom, Man Ho delivered to Huang a list of those guests Temple officials expected to attend the fundraiser. Next to each name was a notation of the amount of money each person had, or was expected to, contribute to the DNC. When Huang saw the list, he asked Man Ho if she knew of anyone else who would like to attend the luncheon for \$2,500. In response, Man Ho called a friend, Catherine Chen, who agreed to contribute \$2,500.¹⁷⁷ On top of the donations solicited by monastics from Temple devotees, and the illegally laundered \$10,000 in anonymous contributions described above, Chen's donation brought the total raised at the Temple prior to Gore's visit to \$45,000.¹⁷⁸

The Vice President arrived at the Temple at approximately 12:30 p.m. on April 29. A throng of invitees and a local high school band were outside to meet him. Inside the entrance hall, Hsia, Huang, Congressman Bob Matsui, and Donald Fowler were among the official greeters. After

¹⁷⁶ Gorman deposition, pp. 78-79. Hsia had previously warned that “the telephones at the Hsi Lai Temple were not to be used for ‘political purposes’ because this would jeopardize the Temple’s non-profit (tax exempt) status.” Ex. 87, p. 2, ¶ 11; *cf. infra* text accompanying note 212 (discussing tax exempt status of Temple).

¹⁷⁷ Man Ho deposition, pp. 143-47 (discussing giving list to Huang and identifying solicitation of Catherine Chen, “Bill Chen’s wife,” as the subsequent \$2,500 donor); Yuh How Bill Chen and Nancy Kainan Mao check #959 (Ex. 131). Catherine Chen’s \$2,500 check bore the name of her husband, Bill Chen, as well as that of “Nancy Kainan Mao.” This suggests that Catherine Chen is the same “Nancy Mao” who was apparently reimbursed by the Temple for a donation made in early 1994. *See supra* note 124.

¹⁷⁸ Man Ho deposition, p. 148.

meeting briefly in a holding room with Master Hsing Yun, the Vice President walked up the Temple's courtyard, between a phalanx of monastics, to the Temple's Buddha shrine, to which the Vice President made a flower offering. From there, the Vice President was escorted downstairs to have his photograph taken with VIP attendees and those who had contributed in connection with the event.¹⁷⁹

At lunch in the Temple's dining hall, the Vice President sat at the head table with Master Hsing Yun, Hsia, and Ted Sioeng, among others.¹⁸⁰ John Huang apparently did not sit at one of the tables, instead circulating amongst the tables working with Temple officials and Gore's "advance" team to ensure that things ran smoothly.¹⁸¹ As part of a brief series of speeches after lunch that included remarks by Hsing Yun, Huang and Fowler, Congressman Matsui, who then also served as the DNC's treasurer, introduced Vice President Gore — who spoke for a few minutes to the assembled guests as Hsia interpreted his comments into Chinese.¹⁸² Immediately following his speech, the Vice President posed outside with all Temple monastics, and left the Temple at about 2:00 p.m.

¹⁷⁹ See generally Man Ho deposition, pp. 176-82; Ex. 122, pp. 11-13.

¹⁸⁰ According to the seating chart, at Gore's table were seated Maria Hsia, Ted Sioeng, Don Knabe, Joseph Thomas, Yvonne Burke, and Gary Shaw, among others. Dining Hall Guest List — April 29th Vice President Gore Event (Ex. 132).

¹⁸¹ See, e.g., Photograph of Vice President Gore at lunch, April 29, 1996 [produced by Temple to the Committee] (seated with Hsing Yun, Maria Hsia, and Ted Sioeng, with Huang in background talking to Bain Ennis of the Vice President's advance staff).

¹⁸² Ex. 122.

From there, the Vice President departed for the airport, flying on Air Force Two to San Jose, and ending up at a DNC fundraising dinner that evening at a private home in Los Altos Hills, California.¹⁸³

At around 3:00 p.m., following the Vice President's departure, the Master and Hsia held a press conference at the Temple. A number of reporters were angry because they had not been permitted to attend the event itself; some also questioned the propriety of holding a political event at the Temple. According to Man Ho,

some reporters say that it was not proper to have this type of luncheon at the temple, but Maria told them that someone has checked with the White House and [they] say that it's okay to have luncheon at the temple.¹⁸⁴

Even on April 29, it had become apparent that the Hsi Lai Temple fundraiser had not raised as much money as Huang and Hsia had hoped. That evening, after the Vice President's departure, Gorman spoke briefly with Hsia at the Temple while she awaited an audience with Venerable Master Hsing Yun. Hsia "seemed disappointed not so much as to how the event itself went, but that they had not been able to raise the amount of money that they wanted to raise."¹⁸⁵ As Gorman recalled,

After the event, I asked Ms. Hsia how she felt the Vice Presidential visit had gone. She responded to the effect that they didn't raise as much [money] as they wanted, but she had talked to the Master and he had said "he would take care of it."¹⁸⁶

¹⁸³ *Id.*, pp. 12-17. There were several other quick stops after the Vice President flew to San Jose before his motorcade arrived at the home of George and Judy Marcus in Los Altos Hills for this event.

¹⁸⁴ Man Ho deposition, pp. 182-83.

¹⁸⁵ Gorman deposition, p. 86.

¹⁸⁶ Ex. 87, p. 3, ¶ 14.

This need for more DNC donations, however, became an urgent priority the next day when DNC officials in Washington began to pressure Huang for more money.

As DNC Finance Director Richard Sullivan later recalled it, he telephoned Huang the day after the Gore luncheon as part of his “general practice” of trying to “rally the troops at the end of the month and ask them to get in money.” He “remember[ed] having a conversation with John” in which he told Huang that “we need you to get some money in.”¹⁸⁷ According to Sullivan,

I remember being disappointed . . . I remember just fine, being somewhat personally disappointed — you know, between San Jose and the fact that it [had been] so important to somebody out there that the event be at the temple, that . . . you would have thought . . . we would get a big contribution out of somebody.¹⁸⁸

Sullivan had “expected that they were going to make some big contributions.” “I was expecting . . . maybe some 15s and 20s”¹⁸⁹ — *i.e.*, individual contributions of \$15,000 or \$20,000 each. Since this had not occurred, Sullivan asked Huang

Can you get some [more] funds in? Can you send some money in? Don’t you have some outstanding money out? . . . I may have said, John, get some money in from your people in Los Angeles, get some money I probably did say, John, get some California money in.¹⁹⁰

Huang apparently wasted little time in passing this message on to Hsia and to the Temple, for during a break in a seminar program being conducted for the assembled monastics by Hsing Yun,

¹⁸⁷ Deposition of Richard Sullivan, June 25, 1997, pp. 41-42.

¹⁸⁸ *Id.*, pp. 46-47.

¹⁸⁹ *Id.*, pp. 50-51.

¹⁹⁰ *Id.*, pp. 45-46.

Man Ho received a telephone call from Hsia informing her that Huang needed to raise more money. Huang, Hsia told her, needed another \$55,000, enough to bring the total raised at the Temple to \$100,000. Hsia also told Man Ho that Huang needed this money before he returned to Washington that very evening.¹⁹¹

Man Ho then contacted Yi Chu, telling her that “we were a certain number [of donations] short, and she wanted me to make it up.” What was needed, Man Ho informed her, was to add another \$55,000 to the \$45,000 the Temple had collected already.¹⁹² Accordingly, given the need for haste, Yi Chu approached the first monastics she saw, soliciting donations from the first 11 monks or nuns she encountered who happened to have their checkbooks with them.¹⁹³ Because many of them did not have enough money to cover the \$5,000 sum Yi Chu asked of them¹⁹⁴ — and because after 1993 it was the Temple’s standard practice to reimburse monastics who made donations to political causes¹⁹⁵ — Yi Chu reimbursed every one of these eleven monastics.¹⁹⁶

¹⁹¹ Man Ho deposition, p. 183; Man Ho testimony, p. 41; Yi Chu testimony, pp. 42 & 47-48. When Man Ho went to inform Hsing Yun and Abbess Tzu Jung of this sudden need for more money, she discovered that they had already been told. Man Ho deposition, p. 185.

¹⁹² Yi Chu deposition, p. 51; Yi Chu testimony p. 43.

¹⁹³ Yi Chu deposition, pp. 55-56; Yi Chu testimony, p. 43.

¹⁹⁴ *See, e.g.*, Yi Chu deposition, p. 60; Yi Chu testimony, pp. 45-46; Siuw Moi Lian deposition, pp. 31-32; Huei-Tsan Huang deposition, pp. 21 & 25.

¹⁹⁵ Yi Chu deposition, pp. 56-57.

¹⁹⁶ *See id.*, pp. 61-65; Yi Chu testimony, pp. 43-44 & 47-48. Some of the donors even postdated their checks to the DNC so that the check Yi Chu wrote them from the Temple’s general expenses account would clear first. *See, e.g.*, Yi Chu deposition, pp. 46-47 (discussing postdated check from Siuw Moi Lian); Yi Chu testimony, pp. 45-46.

Hsing Yun was among those solicited and reimbursed in this fashion. By his own admission, in fact, the Master appears to have been well aware that in assuring Hsia that “he would take care of” Huang’s cash shortfall, he was authorizing monastics’ reimbursement for their DNC contributions. As Hsing Yun put it to Committee staff who met with him at his temple in Kiaoshung in June 1997,

In [the] Hsi Lai Temple there were some monastic and lay disciples who, influenced by my own conduct, also wanted to help Mr. Gore. In truth, they had only limited funds since they ordinarily donate all of their money to Hsi Lai Temple. However, when they want to use some of it, Hsi Lai Temple ought to give it to them. Therefore, when they did not have enough money to cover the checks they were donating, I thought Hsi Lai Temple could help these disciples.¹⁹⁷

“Some devotees did not have enough money,” he said, “so the temple, due their past good service, when they need money the temple will give them the money they want.”¹⁹⁸ “Influenced by [the Master’s] own conduct” in making a contribution that day,¹⁹⁹ ten other monastics joined Hsing Yun in writing \$5,000 checks to the DNC — and in being reimbursed by Yi Chu for the cost of these donations.²⁰⁰

¹⁹⁷ Ex. 25, p. 4.

¹⁹⁸ *Id.*, p. 8.

¹⁹⁹ *Id.*, p. 4.

²⁰⁰ Ex. 133 (DNC Check Tracking Form for Shing Yun check #102 for \$5,000 to DNC on April 30, 1996; IBPS check #3573 for \$5,000 to Shing Yun on May 1, 1996; DNC Check Tracking Form for Man Ya Shih check #509 for \$5,000 to DNC on April 30, 1996; IBPS check #3576 for \$5,000 to Man Ya Shih on April 30, 1996; DNC Check Tracking Form for Hsiu Chu Lin check #702 for \$5,000 to DNC on April 30, 1996; IBPS check #3581 for \$5,000 to Hsiu Chu Lin on May 1, 1996; DNC Check Tracking Form for Suh-Jen Wu check #121 for \$5,000 to DNC on May 1, 1996; IBPS check #3574 for \$5,000 to Suh-Jen Wu on May 1, 1996; DNC Check Tracking Form for Pi-Hsia Hsiao check #195 for \$5,000 to DNC on April 30, 1996; IBPS check #3571 for \$5,000 to Pi-Hsia Hsiao on May 1, 1996; DNC Check Tracking Form for Siuw Moi Lian check #1016 for \$5,000 to DNC dated May 6, 1996; IBPS check #3577 for \$5,000 to Man

Hsia was at the Temple later that evening when Huang stopped by briefly to pick up the checks, before leaving for Washington.²⁰¹ With this money, the amount of money raised by the Temple for the DNC by the April 29 event now totaled \$100,000: \$35,000 in donations solicited ahead of time by Temple monastics, \$10,000 in laundered donations by anonymous devotees before the Vice Presidential luncheon, and \$55,000 in laundered donations in response to Huang's request for more funds just after the event. Added to the sum Huang and perhaps others apparently solicited independently of the Temple, the Vice Presidential fundraiser raised \$166,750 for the DNC.²⁰²

Ya Shih on May 1, 1996; DNC Check Tracking Form for Hueitsan Huang check #243 for \$5,000 to DNC on April 30, 1996; IBPS check #3575 for \$5,000 to Hueitsan Huang on April 30, 1996; DNC Check Tracking Form for Hsiu Luan Tseng check #140 for \$5,000 to DNC dated May 6, 1996; IBPS check #3572 for \$5,000 to Hsiu Luan Tseng on May 1, 1996; DNC Check Tracking Form for Bor Yun Jeng check #221 for \$5,000 to DNC on April 30, 1996; IBPS check #3570 for \$5,000 to Bor Yun Jeng on May 1, 1996; DNC Check Tracking Form for Seow Fong Ooi check #497 for \$5,000 to DNC on April 30, 1996; IBPS check #3578 for \$5,000 to Seow Fong Ooi on May 1, 1996).

According to Yi Chu, Seow Fong Ooi actually contributed \$10,000 to the DNC. Yi Chu deposition, pp. 63-64. Thus, according to the Temple's attorneys, Seow Fong Ooi's second \$5,000 was actually paid to another Fo Kuang Shan nun named Chia-Hui Ho. *See* DNC Check Tracking Form for Chia-Hui Ho donation of \$5,000 on May 1, 1996 (Ex. 134); Ex. 133, p. 19 7284 (IBPS check #3579 providing second Temple payment of \$5,000 to Seow Foing Ooi on April 30, 1996). The Temple's accounting records show this series of payments in sequentially-numbered checks as "No Name" payments. *See* Hsi Lai Temple, Transaction Detail by Account, May 1996 (Ex. 135).

²⁰¹ Man Ho deposition, pp. 183-84 & 187.

²⁰² Democratic National Committee, DNC Contribution Review, Feb. 1997 (Ex. 136) (excerpts), p. 4 (listing "[t]otal raised in connection with event" for "Hsi Lai Temple Event" as \$166,750); *cf.* Man Ho deposition, p. 149 (remarks of Man Hua) (explaining that Man Ho "doesn't know what others contribute[d]" beyond DNC donations solicited by Temple officials). As described earlier, the Hsi Lai Temple raised at least \$146,400 in illegal reimbursed contributions for local, state, and national political campaigns from 1993 through the elections of 1996. Some \$116,500 of this total went directly to the DNC for events involving Bill Clinton, Hillary Clinton, and Al Gore; other recipients included Senator Ted Kennedy and Representative Patrick Kennedy. Sections 441e and 441f of Title 2 of the U.S. Code prohibit knowingly accepting such unlawful donations, and therefore presumably prohibit keeping donations that one discovers have been raised illegally. *See* 2 U.S.C. § 441e ("It shall be unlawful . . . for any person to solicit, accept, or

The repeated donation-laundering in which Hsia and Temple officials, and perhaps Huang, engaged clearly violated federal elections laws barring political contributions made through “straw donors,”²⁰³ and meets the legal definition of a “criminal conspiracy.”²⁰⁴ Moreover, Temple officials have admitted that at least two of the monastics who gave money in connection with the Gore event, Chia-Hui Ho and Seow Fong Ooi, were foreign nationals prohibited from making political contributions²⁰⁵ at the time they made their donations.²⁰⁶ Nor were these two individuals the only

receive any such contribution from a foreign national.”); *id.* at § 441f (“No person shall . . . knowingly accept a contribution made by one person in the name of another.”).

Although the reimbursed monastic donations with regard to the April 29 event have been the subject of media reporting for months, the Committee’s depositions of actual straw donors who gave money to the DNC suggests the DNC has not yet paid back all of the donations it claims to have returned. Man Ya Shih and Siuw Moi Lian, for example, testified in their depositions in August 1997 that although they each gave \$5,000 to the DNC, they have yet to receive their donations back. Siuw Moi Lian deposition, p. 36; Man Ya Shih deposition, p. 44.

²⁰³ 2 U.S.C. § 441f (“No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person.”).

²⁰⁴ *United States v. Hopkins*, 916 F.2d 207 (5th Cir. 1990) (holding that conducting donation-laundering scheme can amount to criminal conspiracy to defraud the United States and to make fraudulent statements to Federal Elections Commission in violation of 18 U.S.C. §§ 371 & 1001); *id.* at 212 (describing elements of conspiracy, and citing *United States v. Medrano*, 836 F.2d 861, 863-64 (5th Cir. 1988); *United States v. Colwell*, 764 F.2d 1070, 1072 (5th Cir. 1985)).

²⁰⁵ *See* 2 U.S.C. § 441e(1) (“It shall be unlawful for a foreign national directly or through any other person to make any contribution of money or other thing of value, or to promise expressly or impliedly to make any such contribution, in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office; or for any person to solicit, accept, or receive any such contribution from a foreign national.”). The term “foreign national” is defined to mean persons who are neither U.S. citizens nor permanent resident aliens *See* 2 U.S.C. § 441e(b) (defining “foreign national” to exclude “any individual who is a citizen of the United States” and any person “lawfully admitted for permanent residence”).

²⁰⁶ Man Ho deposition, pp. 232-33 (identifying Chia Hui-Ho and Seow Fong Ooi as having been neither U.S. citizens nor permanent residents at time of DNC donations); Yi Chu deposition,

foreign nationals reimbursed by the Temple after making contributions to the DNC. According to her responses to a DNC telephone survey, reimbursed Temple donor Bih-Yueh Jeng was neither a U.S. citizen nor a permanent U.S. resident at the time she made her \$5,000 contribution to the DNC in connection with the Presidential event in Los Angeles in July 1996.²⁰⁷ Since Temple officials made no efforts to ascertain the immigration status of monastics or devotees solicited for political contributions, or those selected to participate in “straw donor” reimbursement schemes, it may have been no more than blind luck that prevented even more foreign nationals from making donations.²⁰⁸

p. 96 (similarly identifying Seow Fong Ooi); Ex. 137 (Peter Kelly, letter to Joseph Sandler, Nov. 15, 1996 [discussing Chia Hui-Ho’s \$5,000 contribution to DNC and noting that “this individual’s application for legal permanent residence is still pending before the Immigration and Naturalization Service”]; Immigration and Naturalization Service, approval notice for § 101(a)(27)(C)(ii) special immigration [religious worker] status for Chia Hui-Ho, Oct. 7, 1996; James Robinson, letter to INS, Nov. 7, 1996 [enclosing Chia-Hui Ho’s application for permanent resident status]).

²⁰⁷ Ex. 138 (Bih-Yueh Jeng, Debevoise & Plimpton survey response via telephone interview, Dec. 17, 1996, p. DNC 1803698 [answering “No” to question “Are you a United States citizen?” and “No” to question “Are you a permanent resident of the United States?”]; Immigration and Naturalization Service, Petition for a Nonimmigrant Worker, Sept. 27, 1996 [granting Bih-Yueh Jeng’s petition for nonimmigrant religious worker status several months *after* the Temple event]).

²⁰⁸ *See* Yi Chu deposition, p. 95 (“Well, I didn’t know whether contributions were prohibited from the noncitizens or nonpermanent residents. All I did was to encourage people to make donations.”). Moreover, the Temple’s donation-laundering scheme raises questions as to the ultimate source of the monies that flowed into the DNC’s coffers over the 1993-96 period. As noted previously, the reimbursements were all made out of the Temple’s general expenses account, which in turn got its money from the account into which Buddhist devotees made donations to the Temple. Because Temple officials never screened Buddhist contributors to the Temple for U.S. citizenship or permanent resident alien status, there is no way of knowing whether or not the money that ended up being funneled to the DNC by Hsia and Huang ultimately came from foreign nationals. *See id.* (stating that “[n]o attempt was ever made” to determine whether devotees were citizens or permanent residents).

Richard Sullivan and the DNC clearly knew that it was inappropriate to have a fundraiser at the Temple. As he told John Huang when Huang first described his Temple plan, for example, “you know, . . . you can’t do a fund-raiser at a temple.”²⁰⁹ Nevertheless, faced with huge pressures to raise money for the re-election of Bill Clinton and Al Gore, Sullivan let Huang continue with the event even though Huang admitted that “he’d get money out of it” and “he’d get some money out of them.”²¹⁰ But the impropriety could not be erased simply because Huang promised that he would not solicit *all* attendees for money.²¹¹ As one of the DNC’s own auditors noted after the Temple affair had begun to appear in the national press, contributions from the Temple should be returned because “[i]t was a temple, you idiot!”²¹²

One reason why it was wrong to hold the fundraiser there is that the Hsi Lai Temple — in its corporate incarnation as the International Buddhist Progress Society (IBPS) — is a §501(c)(3) organization for federal income tax purposes.²¹³ Like all churches, therefore, it is prohibited by law, not to mention its own organizational charter, from engaging in political activity. As the Temple’s

²⁰⁹ Sullivan deposition, June 25, 1997, p. 23.

²¹⁰ *Id.*, p. 24.

²¹¹ *Id.*, pp. 24 & 26.

²¹² Democratic National Committee, list of contributions returned since September 1996, Nov. 22, 1996 (Ex. 139) (listing \$5,000 donation from “Buddhist Temple” and noting as reason for refund that “It was a temple, you idiot!”).

²¹³ *See, e.g.*, Internal Revenue Service, *Cumulative List of Organizations*, vol. 1, Sept. 30, 1995, p. 1049 (Ex. 140) (listing “International Buddhist Progress Society, Hacienda Heights, Ca.” as tax-exempt organization). The IBPS was also exempt from California taxes as a nonprofit organization. *See* International Buddhist Progress Society, Statement by Domestic Nonprofit Corporation, March 15, 1996 (Ex. 141) (document signed by Hsing Huang Shin, Liang Yueh Fang, and Tsui-Hsueh Hsueh [a.k.a. Yi Chu], listing Hsia as agent for service of process).

own articles of incorporation state, “the corporation shall not participate or intervene in any political campaign . . . on behalf of any candidate for public office.”²¹⁴ Political activity of the sort in which Temple officials engaged, *e.g.*, donating Temple money to political campaigns and soliciting funds for such campaigns, is impermissible. Moreover, contributions made by faithful Buddhists to the Temple are tax deductible. On top of the various legal concerns already discussed herein, this raises at least two additional troubling issues.

First, the checks laundered through Temple monastics to the DNC — over \$100,000 worth in 1996 alone — apparently consisted of money derived directly from tax-exempt charitable contributions made to the Temple. In essence, therefore, this amounts to taxpayer funding for political contributions to the DNC, which is clearly prohibited.

Second, this use of Temple funds perpetuated a fraud upon faithful Buddhists who donated to the Temple upon the assumption that their money would be used to advance the Temple’s legitimate religious purposes and not be given to a political party. Through the Temple’s donation-laundering and willingness to host political fundraisers for various candidates, however, money given by faithful devotees to the Temple was illegally diverted without their knowledge to support the re-election of Bill Clinton and Al Gore.²¹⁵

²¹⁴ International Buddhist Progress Society, Articles of Incorporation, Aug. 4, 1978, p. 1 (Ex. 142). This document was signed by three Temple officials, two of whom were Hsing Yun himself and former Temple Abbess Hsing Kuang Shih, *id.*, p. 3 — both of whom were subsequently involved in unlawful Temple donation-laundering in support of various political causes.

²¹⁵ Another potential consequence to the Temple from this violation of its Section 501(c)(3) status relates to the validity of visas and green cards Hsia obtained for Fo Kuang Shan religious workers under the terms of the Immigration Act of 1990. Because the Temple had apparently been engaged in unlawful political activity through Hsia since at least 1993, it is open to question as to

It is also worth noting that there is a problem here even apart from the Temple's reimbursements of DNC donors. As the Committee learned from Maura McManimon, the DNC's event coordinator for the Temple luncheon, the DNC had *no* expenses in organizing the Temple event apart from Huang's airfare to Los Angeles. The DNC apparently did not even give McManimon a budget for this event, and had absolutely no idea what the Temple luncheon cost because the Temple paid for everything.²¹⁶ These expenditures alone amounted to a large, in-kind contribution to the DNC by the Temple.

Significantly, the DNC did not repay the Temple for this significant in-kind contribution until the day *after* the first stories about the Temple affair appeared in the *Wall Street Journal* on October 17, 1996.²¹⁷ It was only then that the DNC decided to reimburse the Temple for the money it saved the DNC in organizing the Gore event, by sending the Temple a check for \$15,000.²¹⁸

When press accounts of the Temple fundraiser and associated donation-laundering by the Temple began to appear in the fall of 1996, Temple officials became alarmed. Both Man Ho and Yi Chu, in fact, "panicked" and set about destroying and altering documents in their files which they felt

whether the Hsi Lai Temple qualifies as such a "bona fide nonprofit" organization. As Hsia's assistant Matthew Gorman recognized, political activity by the Temple might threaten the validity of all the religious worker visas and green cards obtained for Temple affiliates since 1993. *See* Gorman deposition, p. 75.

²¹⁶ Deposition of Maura McManimon, July 25, 1997, pp. 49-50 & 58-59.

²¹⁷ Kuntz, *supra* note 1.

²¹⁸ The DNC's check for this reimbursement was written on the very day the first stories appeared. *See* Ex. 143 (Bradley Marshall, letter to Man Ho, Oct. 18, 1996, enclosing \$15,000 check to cover estimated costs of April 29, 1996 event; DNC Services Corporation check #025100 for \$15,000 to Buddha's Light International Association on October 17, 1996).

were “embarrassing.” Man Ho destroyed a number of documents relevant to the Temple’s illegal donation-laundering, including:

- (1) The check-request forms that Man Ho had prepared for the Abbess’ signature after receiving calls from Maria Hsia requesting political contributions;
- (2) The list of attendees Man Ho gave to John Huang on April 28 indicating guests who would attend the Gore luncheon, who among them had agreed to donate money to the DNC, and the amount of each contribution; *and*
- (3) Most of the paperwork held at the Temple in preparation for the Vice President’s visit, including invitations (including newspaper clippings of the event).²¹⁹

Venerable Master Hsing Yun has subsequently claimed that the destruction of these documents was merely part of an ongoing process by which the Temple would “regularly purge old files in storage and add new ones” and “has nothing to do with destruction of evidence.”²²⁰ It is clear from Man Ho’s testimony, however, that this is untrue. Furthermore, when questioned by Senator Susan Collins during Committee hearings, Yi Chu admitted that the nuns’ document purge was anything but ordinary:

Senator Collins: When the press stories appeared regarding the temple fund-raiser and the reimbursements, were you worried that the negative publicity would hurt the temple’s reputation?

²¹⁹ See Man Ho deposition, pp. 155-58 & 219-20 (recounting “panic,” “embarrassment,” and document destruction).

²²⁰ Hsing Yun, statement in response to Governmental Affairs Committee hearings, Sept. 6, 1997 (Ex. 144) [translated by Michael Yan for the Governmental Affairs Committee].

Ms. Yi-Chu: Yes.

Senator Collins: And you also did not want to embarrass the Vice President or . . . Maria Hsia; is that correct?

Ms. Yi-Chu: Yes.

Senator Collins: So that was your motivation for making these changes and altering these documents as well as destroying other documents; is that correct?

Ms. Yi-Chu: Yes.²²¹

Temple officials did, therefore, engage in the deliberate destruction of evidence in an effort designed to cover up the Temple's role in laundering donations to the DNC in connection with Vice President Gore's April 29, 1996 fundraiser.

In addition to this campaign of document destruction, Yi Chu testified that in approximately November of 1996, she modified some of the cashed Temple checks used to reimburse monastic donors on the day following the event. After stories about the Temple incident began to appear in the press, she added, often in Chinese characters, the words "loan" or "Futien account" on the previously-blank "memo" lines of a number of checks.²²² This, she hoped, would conceal the actual origin of the reimbursements: while the checks had actually come out of the Temple's general

²²¹ Yi Chu testimony, Sept. 4, 1997, p. 65; *see also id.*, pp. 34-35 & 97 (confirming that motive for destruction was to avoid embarrassment).

²²² These altered checks were the ones produced to the Committee pursuant to its subpoena of the Temple, but the forgery can clearly be seen if one compares the altered checks produced by the Temple with photocopies kept by the bank when the checks were originally cashed in their unaltered form. Exhibit showing "Checks as produced by Temple" alongside "Checks as cashed by bank" (Ex. 145) (reproducing illustrative IBPS reimbursement checks to Hsiu Chu Lin, Hsiao Jie Su, and Seow Fong Ooi).

expenses account with no expectation of repayment, she wanted to create the impression they were either “loans” to the monastic donors or had come from these donors’ *own funds* held for them by the Temple in so-called Futien accounts.²²³

Yi Chu’s alteration of these checks is significant not only because of the cover-up it demonstrates, but because it emphasizes the fact that while Yi Chu *could have* selected to make contributions only monastics who had sufficient funds in their personal “Futien” accounts to cover the cost — and thereby create at least the basis for an argument that the political contributions by these monastics were voluntary ones made from personal monies — she instead followed her usual pattern of immediately reimbursing the ostensible donors from the Temple’s general expenses account, which is funded with tax-deductible contributions to the Temple itself. These alterations underscore the fact that the Temple’s numerous reimbursements during the 1993-96 period were *not* done with the donors’ “own” money, and they make clear that Temple officials clearly understood that it was wrong to reimburse donors with the Temple’s funds.

Temple monastics were also less than candid in responding to press inquiries and official investigations of the Temple affair. Man Ya Shih — whose false story about donation-laundering had helped first bring the episode to light when it was reported in the *Wall Street Journal* in October 1996²²⁴ — was the worst offender in this regard. In a letter to Hsia apologizing for certain false statements she had made to the *Journal* and seeking Hsia’s approval of a proposed written response

²²³ See Yi Chu deposition, pp. 47-50, 83-84, & 108-09.

²²⁴ See Kuntz, *supra* note 1.

to FEC inquiries, for example, Man Ya Shih promised Hsia that “I will cover the fact if I did help anyone in laundering the money.”²²⁵ Thereafter, in a signed and sworn statement to the FEC, Man Ya Shih did exactly this — swearing that no one had given her the money she used to make her \$5,000 donation to the DNC.²²⁶

In early 1997, Maria Hsia also played a role in coordinating monastics’ responses to the Ernst & Young surveys sent to contributors by the DNC as part of their review of campaign finance problems — helping them respond to difficult questions such as who had solicited their donations and whether anyone else had provided them with money for this purpose.²²⁷

²²⁵ Ex. 146 (Man Ya Shih, letter to Maria Hsia, Nov. 7, 1996; Man Ya Shih, excerpt from November 7, 1996 letter to Maria Hsia translated from Chinese by Michael Yan for Governmental Affairs Committee).

²²⁶ Man Ya Shih, sworn declaration to Federal Elections Commission, Nov. 30, 1996, p. 2 (Ex. 147), (“Please note that I was not given money to donate to DNC. But money given to me from the past years was used to be donated to DNC by my kind intention to support the people to elect the right persons to the Government.”). Hsia apparently also forwarded information to Man Ya Shih regarding the requirements of federal election law, and attempted to arrange for Man Ya Shih to receive legal representation from Hsia’s own lawyer, James Robinson. *See* Ex. 148 (Progress Sheet from files of Hsia & Associates [recounting Man Ya Shih inquiry about election law, apparently on Nov. 1, 1996]; Maria Hsia, fax transmission to Jim Robinson, Nov. 6, 1996 [forwarding “Statement of Designation of Counsel” signed by Man Ya Shih]). As the DNC attempted to assess the scope of its illegal-donation problem in late 1996 and early 1997, Hsia apparently helped a company called Matsunichi of America prepare a response to the DNC’s questionnaire in which it denied that its president, Pan Su Tong, had ever made any contributions to the DNC. At the time, however, Hsia possessed both a photocopy of Pan’s \$5,000 check to the DNC on July 22, 1996 and a copy of the bank statement showing that it had been cashed by the DNC. Ex. 149 (Packet of materials forwarded to Matt Gorman by Matsunichi of America, including: check in name of Pan Su Tong signed by Lance Zheng; copy of bank statement for August 1996; draft letter denying contribution written on letterhead of Matsunichi of America and prepared for signature by Lance Zhang; copy of questionnaire sent to Pan by Ernst & Young on behalf of DNC).

²²⁷ *See, e.g.*, Matthew Gorman, fax transmission to Jan Yueh Lian Huang, Jan. 9, 1997 (Ex. 150) (noting that “I will ask Ms. Hsia about item number 16.”); *id.* at SEN 00329 (enclosure of Ernst & Young DNC donor survey). Question 16 of Huang’s survey was an inquiry as to “who was the person who asked or solicited you to make this contribution.” Moreover, this survey response

Another nun, Siuw Moi Lian — who donated \$5,000 to the DNC in connection with the Gore luncheon and was reimbursed by the Temple — appears to have submitted a false response to the DNC when asked about her role. When asked on behalf of the DNC by the accounting firm of Ernst & Young whether anyone had solicited her donation and what the source of the money for it had been, Siuw Moi Lian wrote “myself.”²²⁸

Hsia barred reporters from viewing the videotape taken by King & I Productions, videographers hired for the Vice President’s Temple luncheon, including that taken of the speeches made by Vice President Gore and others to the assembled guests.²²⁹ Within two days of the luncheon, all copies of the videotape footage were gathered up from the film company and quickly shipped to Taiwan.²³⁰ Moreover, the monastic who took the tape from the production company on May 3, 1996

contains a handwritten note by Matt Gorman in the response portion of Question 15 — which asks “If this money was not yours, we need to know whose money it was. Please tell us whose money was given to the DNC and give us his/her name.” Gorman’s note, which was written in Chinese, indicates that he will ask Maria Hsia about this question. *Id.*; *see generally* Gorman deposition, p. 92 (identifying authorship and content of handwritten note); Matthew Gorman, fax transmission to Maria Hsia, Jan. 11, 1997 (Ex. 151) (forwarding Huang’s query about survey and requesting “Please let me know how you suggest she should respond.”); Ex. 87, p. 3, ¶ 15 (“In late 1996 or early 1997, Ms. Hsia asked me to help any persons who had donated to the DNC in connection with the April 29, 1996 event who needed help in responding to questionnaires sent by Ernst & Young on behalf of the DNC.”). According to Gorman, he did indeed ask Hsia about Huang’s responses, but was told merely to “say whatever is true.” Gorman deposition, p. 94. He could not remember whether he helped other donors “coordinate” their responses with Hsia.

²²⁸ Siuw Moi Lian survey response, undated (Ex. 152).

²²⁹ *See* Memorandum of Interview of Anonymous Chinese newspaper reporter, May 16, 1997, pp. 1-2.

²³⁰ Hank Tseng, letter to Christopher Ford, Aug. 27, 1997 (Ex. 153); Hearing testimony, Sept. 4, 1997, pp. 167-69 & 173-81.

— a monk by the name of Man-Chin²³¹ — left the Fo Kuang Shan order shortly after the Committee served Temple officials with a subpoena for the videotape; he has since disappeared.²³² Despite the repeated assurances of Temple officials that they are looking for this missing tape — and despite the fact that Temple officials have used short excerpts from this tape in making a brief publicity video that appeared on the Cable News Network — the full videotape record of the event with Vice President Gore on April 29, 1996 remains hidden to this day.

It has continued to be difficult to establish precisely what the Vice President claims to have known about the nature of the Temple fundraiser. At first, he claimed that he believed the Temple lunch was only a “community outreach” event.²³³ Later, Vice President Gore said that had believed it to be a “finance-related” event,²³⁴ a term that the White House apparently now uses to describe a range of events including, but not limited to, fundraisers. More recently — after it became apparent to the Committee that no one at the White House or the DNC could ever recall seeing or using the term “finance-related” prior to the point at which the Hsi Lai Temple story first broke in the press in October 1996²³⁵ — Vice President Gore adjusted his position again. On the day before Committee

²³¹ See Ex. 153.

²³² Hearing testimony, Sept. 4, 1997, pp. 174-75 & 179 (remarks of Man Ho, Senator Fred Thompson, and Brian Sun).

²³³ Albert Gore, interview by Nina Totenberg for National Public Radio, Oct. 22, 1996 (“It was billed as a community outreach event . . .”)

²³⁴ See Brian McGrory, “Gore says he knew Buddhist event was fund-raiser; He earlier cited ‘community outreach,’” *Boston Globe*, Jan. 15, 1997, at A9.

²³⁵ According to the Vice President’s scheduler Kim Tilley, in fact, the term “Finance-related event” was never used at all. Tilley deposition, p. 128 (“We would not call them DNC Finance-related events.”).

hearings on this subject, White House officials told reporters that the Vice President had actually believed it to be a “donor-maintenance” event, by which they apparently meant that he felt it to be an affair for DNC contributors at which money was *not* to be raised.²³⁶ The Vice President has said that “no money was offered or collected or raised at the event,”²³⁷ and he has insisted that “[i]t was not a ticketed event.”²³⁸ According to his spokeswoman Ginny Terzano, “[a]ny money collected was without our knowledge.”²³⁹

Virtually everyone at the DNC and on the Vice President’s staff, however, not only clearly understood the Hsi Lai Temple event to be a “fundraiser,” but also freely and repeatedly described it as such. Indeed, Vice President himself once referred to his DNC engagement in Los Angeles that day as a “fundraiser” — and did so at a point after which he had already accepted Hsing Yun’s invitation to visit the Temple. Moreover, it is clear that both the Vice President himself and his staff members understood that whatever the event was ostensibly *called*, its purpose was to raise money for the DNC.

The Vice President was advised of this, for example, by Harold Ickes, who described the event’s anticipated fundraising total to the Vice President on the day before the Vice President

²³⁶ See David Stout, “Gore’s Presence at Fund-Raiser Called Innocent,” *New York Times*, Sept. 3, 1997, p. A19.

²³⁷ Albert Gore interview, *supra* note 233.

²³⁸ See Dan Balz, “For Vice President Gore, a Term of Transition,” *Washington Post*, Jan. 20, 1997, p. E31.

²³⁹ See John Mintz, “Fund-Raisers Pressured Temple After Gore Visit,” *Washington Post*, June 13, 1997, p. A20.

received his briefing notes from the DNC for the Temple visit. In fact, at least two of the guests who attended the event in Hacienda Heights on April 29, 1996 recall fundraising actually being discussed from the lectern — in the presence of the Vice President. While there are obvious reasons for the Vice President to wish to distance himself from the Temple event by claiming that he had no idea fundraising was involved, such a claim is improbable.

To understand what the Vice President really knew about the Temple, one must first understand the “dire financial situation” that faced the DNC after Republicans won majorities in Congress in 1994.²⁴⁰ Without vast new infusions of money, felt the Democrats in the White House, they could not afford the expensive media campaign needed to save themselves from a similar defeat in 1996.²⁴¹ With this very much in mind, Vice President Gore resigned himself to a long and arduous season of fundraising, concluding that “we can raise the money — BUT ONLY IF — the President and I actually do the events, the calls, the coffees, etc. . . . And we will have to lose considerable time to the campaign trail to do all of this fundraising.”²⁴²

The DNC’s April fundraiser in Los Angeles was a direct result of the fundraising campaign that grew out of the perceived importance of financing the DNC’s massive media campaign on behalf of the President’s re-election. Since the beginning of 1996, in fact, DNC and White House officials

²⁴⁰ Deposition of David Strauss, June 30, 1997, p. 254.

²⁴¹ According to one DNC Trustee, for example, the DNC established a special media fund was established because of the “the media campaign was going to be expensive.” Deposition of Beth Dozoretz, Sept. 2, 1997, p. 56. Ultimately, the DNC spent many millions of dollars on this campaign, which the President himself identified in videotaped comments produced to the Committee by the White House.

²⁴² Albert Gore, “Points for Political Budget Meeting with President,” undated, p. 4 (Ex. 154).

had been planning a fundraiser for the Vice President in April of that year. In early January, for example, Ickes sent a memorandum to the Vice President outlining the DNC's proposed events for 1996. This memorandum outlined, among other things, a plan to hold a \$200,000 fundraiser for Vice President Gore in Los Angeles in April; it was to be the Vice President's only one in the city that month.²⁴³

This initial DNC proposal for Vice President Gore's only April 1996 event in Los Angeles became increasingly specific over time in additional Ickes memoranda forwarding fundraising targets to the Vice President. On February 9, for example, another Ickes memorandum raised the anticipated fundraising goal from Gore's planned April trip to Los Angeles to \$250,000, and projected its likely expense as \$25,000.²⁴⁴ At least by early March 1996, it appears, John Huang — now the DNC's top fundraiser among Asian-Americans — had been given responsibility for some of the upcoming events in California.²⁴⁵ By March 12, Vice President Gore's scheduling staff had begun specifically to

²⁴³ This document also outlined the DNC's plan for another \$200,000 April fundraiser for Gore in San Jose. This Ickes memorandum is the first planning document which the Committee has been able to locate for the two April 29, 1996 fundraisers attended by the Vice President. Harold Ickes, memorandum to the President and Vice President, Jan. 2, 1996, p. SCGA-00286 (Ex. 155) (identifying VPOTUS events in April listed as intended to raise "\$ AMOUNT[s]" of 200K" in Los Angeles and another "200K" in San Jose). This document is stamped "THE PRESIDENT HAS SEEN," with a handwritten notation appearing next to this reading "1/8/96."

²⁴⁴ Harold Ickes, memorandum to the President and Vice President, Feb. 9, 1996, at EOP 041361 (Ex. 156). This document is marked to indicate that the President read it on February 22.

²⁴⁵ On March 7, for example, the Vice President's deputy chief of staff, David Strauss, had a telephone conversation with Huang about "events in Cal[ifornia]." David Strauss, telephone memorandum, March 7, 1996 (Ex. 157).

discuss possible dates for the event, referring in internal memoranda to upcoming “DNC fundraisers in San Jose & LA” on “April 27-29.”²⁴⁶

No specific location was set or even discussed for the Vice President’s April fundraiser in Los Angeles, however, for some time after the initial Ickes memorandum in January that outlined the need for such an event. The first connection of a specific location to the Los Angeles fundraising trip, as we have seen, apparently came from the Vice President himself when he met at the White House with Venerable Master Hsing Yun on March 15. Vice President Gore’s reference during this meeting to an upcoming trip to Los Angeles, apparently in April, could only have been to the \$250,000 fundraising trip of which Ickes had advised the Vice President in his January and February memoranda: he had no other trips to Los Angeles planned between March 15 and April 29. This meeting was therefore the first time anyone at the White House had discussed a specific location in connection with Vice President Gore’s April visit to Los Angeles.

Indeed, Huang and Hsia, at least, may even have *intended* the March 15 meeting with Hsing Yun to lay the groundwork for a Vice Presidential fundraiser at the Hsi Lai Temple. There is little other way, in fact, to explain the involvement of both Huang and Hsia in this meeting: Huang’s job was to raise money for the DNC among Asian-Americans, and he and Hsia had been raising money together for Al Gore since 1989. Huang both requested and organized the Vice President’s March 15 visit with Hsing Yun, and it was he who wrote the Vice President’s briefing notes for the meeting. Furthermore, on March 13, two days before the White House meeting, the Vice President’s deputy

²⁴⁶ Lisa A. Berg, e-mail to Kimberly H. Tilley, March 12, 1996 (Ex. 158) (discussing “Up-coming travel of the Vice President”).

chief of staff, David Strauss, had a telephone conversation with Huang. Strauss claimed not to remember any specifics of this conversation, but he testified that it *was* related to the upcoming Hsing Yun visit at the White House.²⁴⁷ Significantly, his notes of this conversation include the notation “John Huang . . . lead to a lot of \$.”²⁴⁸

Vice President Gore also clearly knew on March 15, 1996 that the DNC hoped to have him attend a fundraiser in Los Angeles at the end of April. Just after his meeting with Hsing Yun, his scheduler Kim Tilley asked the Vice President in an e-mail message about whether he would be interested in adding another stop on his April 29 itinerary on top of “the two fundraiser[s] in San Joe [sic] and LA.” In this same message, she informed the Vice President that “[w]e’ve confirmed the fundraisers for Monday, April 29th.”²⁴⁹ The Vice President responded — also that afternoon, by this point still only some four hours after having discussed his upcoming trip to Los Angeles with Hsing Yun in accepting the Temple’s invitation to visit — that “if we have already booked the fundraisers, then we have to decline” invitations to add additional stops on the trip.²⁵⁰

²⁴⁷ Strauss deposition, June 30, 1997, pp. 56 & 59 (identifying telephone memorandum and adding that “in my head . . . I have this linked with the Vice President’s meeting with the Venerable Master.”); *id.*, p. 68 (“[T]his is connected to the meeting with the Vice President. That’s the linkage.”); *see generally id.*, pp. 56-68.

²⁴⁸ David Strauss, telephone memorandum, March 13, 1996 (Ex. 159).

²⁴⁹ Kimberly H. Tilley, e-mail message to Albert Gore, March 15, 1996 (Ex. 160).

²⁵⁰ Albert Gore, e-mail message to Kimberly Tilley, March 15, 1996 (Ex. 160). Both Tilley and David Strauss have said that when the Vice President sent this e-mail, he understood the April 29 event to be a fundraiser. Strauss deposition, June 30, 1997, p. 83; Tilley deposition, pp. 147-48.

The March 15 meeting at the White House thus set in motion the process of picking the Hsi Lai Temple as the location for Vice President Gore's April 29 fundraiser in Los Angeles. Within two weeks, the DNC had confirmed the Temple as the location and notified the Office of the Vice President of this fact: by April 3, Maura McManimon had already sent a memorandum to the White House that described the location of this event as "Hsi Lai Temple (Buddhist Temple presided over by Hsing Yun, whom the Vice President has met)."²⁵¹

Although Vice President Gore had been sufficiently concerned about possible foreign policy embarrassments to call Hsia for reassurances before meeting Hsing Yun at the White House in March 1996, the Vice President appears to have pressed ahead with the April 29 Temple event despite the misgivings of the NSC and his own national security advisors. As the fundraiser approached, the NSC again urged "great, great caution."²⁵² Because of these concerns, the Department of State was consulted; it suggested certain criteria to govern the event in the interest of preventing "political exploitation by people from Taiwan." According to these rules, the Temple event was not to be billed as a "Taiwan" event but rather one "for the Chinese community of Southern California." No "Taiwan

²⁵¹ Maura McManimon, memorandum to Jackie Dycke, April 3, 1996 (Ex. 161) (outlining for White House luncheon in Los Angeles). The very next day, as we have seen, Hsia asked Gorman to open a file entitled "Vice President Gore Hsi Lai event April 29, 1996 — DNC Fundraiser." *See supra* note 160.

²⁵² Robert Suettinger, e-mail message to John Norris, April 19, 1996 (Ex. 162) ("This is terra incognita to me. Certainly from the perspective of Taiwan/China balancing, this would be clearly a Taiwan event, and would be seen as such. I guess my reaction would be one of great, great, caution. They may have a hidden agenda."). Gore's schedulers had consulted with the Vice President's national security staff in order "to find out if there are any problems/ramifications with the use of the Hsi Lai Temple [sic] for the VP's DNC Lunch while in LA." Jackie Dycke, e-mail message to Tyler S. Beardsley, April 15, 1996 (Ex. 163); *see also* Jackie Dycke, e-mail message to Kimberly Tilley, April 16, 1996 (Ex. 164) ("Did you ever hear back from Bill [Wise] on Hsi Lai Temple?").

flags or KMT symbols or other signs that would be embarrassing for the VP” could be displayed at the Hsi Lai Temple, and “no Taiwan politician should be allowed to exploit the event.”²⁵³ Despite the imposition of these criteria, however, the Vice President’s own national security staff suspected that the event’s DNC organizers would be unable to meet them. As one aide put it, “I think it may be difficult for the sponsors to meet the three criteria suggested by State.”²⁵⁴ As one of Vice President Gore’s national security aides, Bill Wise, warned in mid-April, “I tend to *seek the safer course* in these situations, but I suspect the VP might opt to go ahead” anyway.²⁵⁵

It has been suggested — in accounts attributing this information to Hsia after stories about the Temple scandal began to appear in the press — that Huang had planned to hold his April 29 Vice Presidential fundraiser at the Harbor Village Restaurant in Monterey Park, California, but that this fundraiser was relocated to the Temple “several days before Gore’s trip.”²⁵⁶ Such claims of a “last-minute” switch in location are false. As the restaurant’s management declared in a sworn statement given to the Committee, no one ever contacted the Harbor Village about holding an event there on April 29, 1996.²⁵⁷ Even had the event initially been planned for another site, in fact, no specific

²⁵³ John Norris, memorandum to Bill [Wise], April 16, 1996 (Ex. 165).

²⁵⁴ Bill Wise, handwritten addendum to John Norris memorandum of April 16, 1996 (Ex. 165).

²⁵⁵ *Id.*

²⁵⁶ See Rich Connell and Alan C. Miller, “Principals Say Temple Event was Explicit Fund-raiser,” *Los Angeles Times*, Nov. 3, 1996, p. A21 (recounting claims by “Hsia and others” that Harbor Village Restaurant fundraiser was changed to Temple “several days before Gore’s trip”).

²⁵⁷ Diana So, letter to Special Agent Gayle Jacobs, May 20, 1997 (Ex. 166) (“Per your request, we have looked into our reservation book back to the period between February 1996 and May 1996, [and] our record shows that there was not any party organized by John Huang, Maria Hsia or Matthew Gorman in our restaurant.”). A review conducted at the request of the Committee by

location for the April 29 fundraiser other than the Hsi Lai Temple was ever discussed by or with anyone at the White House.²⁵⁸

It is clear, therefore, that the Hsi Lai Temple was the only specific location ever discussed with White House officials. Documentary evidence also makes clear that after DNC event coordinator Maura McManimon sent her April 3 memorandum to the White House specifically identifying the Temple as the location for the DNC luncheon, the White House knew that the purpose of the April 29 stop in Los Angeles was to raise money. On April 10, for example, Harold Ickes sent the Vice President another memorandum, advising him that the April 29 event would raise \$250,000

the Vice Presidential Protective Division (VPPD) of the U.S. Secret Service also showed no “records that would relate to a planned or actual visit by the Vice President to the Harbor Village Restaurant located in Monterey Park, California. No VPPD record reflects a planned or actual visit to that site.” Ex. 122, p. 2.

²⁵⁸ Hsia at one point apparently possessed a draft invitation on what appeared to be DNC letterhead for a DNC event on April 29 at the Harbor Village. Invitation to DNC APALC Event (Ex. 167). This document, however, was produced to the Committee only by Hsia & Associates, and apparently exists nowhere in the files of either the DNC or the White House (suggesting that no one beside Hsia ever saw it). Moreover, Gorman could not recall when he first saw this document. Indeed, Gorman admitted that he may only have seen it *after* the Gore fundraiser, and may indeed only have learned anything about the purported Harbor Village plan from Hsia herself — or from newspaper accounts quoting her that appeared after the Temple scandal had begun to break in the press. *See* Gorman deposition, pp. 187-90. No other document or testimony suggests any other specific location for the April 29 fundraiser apart from the Hsi Lai Temple itself, and there is no evidence that any such information was ever transmitted to the White House.

and would be organized by John Huang.²⁵⁹ Ickes specified further that for this event, as well as for the event in San Jose that same day, “all proceeds [would go] to [the] DNC.”²⁶⁰

Ickes sent the Vice President another memorandum on April 25, 1996, once again describing the DNC as planning a fundraising event in Los Angeles on April 29 — again listing John Huang as the organizer, but now describing it in more detail as a luncheon and raising its “projected revenue” to \$325,000.²⁶¹ Within 24 hours of receiving this memorandum, Vice President Gore was given briefing materials from the DNC informing him that the DNC luncheon he would attend on April 29 was at the Hsi Lai Temple.²⁶² The conclusion could scarcely have been more obvious.²⁶³ From these memoranda alone, it is clear that Vice President Gore understood the Temple event to be a DNC fundraiser.

²⁵⁹ Harold Ickes, memorandum to the President and the Vice President, April 10, 1996 (Ex. 168), p. EOP 040782 (identifying VPOTUS event in Los Angeles on “29-Apr” having “Projected Revenue” of \$250,000 and “Huang” as the staff contact). Later, this same memorandum again listed events for April as including a \$250,000 fundraiser on April 29. *Id.*, p. EOP 040791.

²⁶⁰ *Id.*, p. EOP 040808.

²⁶¹ Harold Ickes, memorandum to the President and the Vice President, April 25, 1996 (Ex. 169), p. SCGA-01213 & -01223 (listing fundraiser in sections describing projected April events).

²⁶² DNC Finance, memorandum to Office of the Vice President, April 26, 1996 (Ex. 170) (briefing notes prepared by Richard Sullivan, John Huang, and Maura McManimon), pp. D 0000027-28 (last set of notes phrased in second person [*i.e.* “you”] for Vice President Gore discussing DNC luncheon at Hsi Lai Temple).

²⁶³ Nor is there any question that the Vice President received this and other memoranda from Ickes. As Gore’s executive assistant Heather Marabetti testified, while the Vice President’s staff generally culled his “inbox” in order to remove documents that were not of the utmost importance, Ickes’ memoranda always “stayed in the inbox” so as to receive personal Vice Presidential attention. Deposition of Heather Marabetti, Sept. 3, 1997, pp. 66-67.

The Vice President's staff also clearly understood that the April 29 event at the Temple was a fundraiser, as attested by the numerous internal messages and memoranda discussing the upcoming April 29 "fundraiser" in Los Angeles. On April 11, in fact, his staff held a meeting in Kimberly Tilley's office to discuss the upcoming "fundraising events on April 29."²⁶⁴ Despite later White House claims that the Temple fundraiser was "not a ticketed event,"²⁶⁵ at this April 11 meeting, Vice Presidential scheduler Jackie Dycke handed out copies of a document she had prepared showing that the upcoming April 29 luncheon at the Temple in Hacienda Heights had a "ticket price" of \$1,000 to \$5,000 a head.²⁶⁶ This document was prepared on the basis of information given her by the DNC. Throughout the rest of April, internal White House e-mail traffic continued to refer to the upcoming Los Angeles "fundraiser,"²⁶⁷ the last of such references being on April 24, less than a week before the event was to occur.²⁶⁸

²⁶⁴ See, e.g., Jackie A. Dycke, e-mail to R. Martinez et al., April 10, 1996 (Ex. 171) ("As you know, the VP is going to San Jose and LA for DNC fundraising events on April 29. . . . We are going to have a meeting at 2:15 p.m. TOMORROW (Thursday) in Kim Tilley's office (Room 285) to discuss everything that is out there for this California trip."). This e-mail was sent to no fewer than 11 people on Vice President Gore's staff: R. Martinez, John Emerson, Kim Tilley, Julie Payne, Karen Skelton, Ellen Ochs, Wendy Hartman, Caren Solomon, Dennis Alpert, David Thomas, and Kim Hopkins.

²⁶⁵ See *supra* text accompanying note 238.

²⁶⁶ Current Schedule for April 29, April 11, 1996 (Ex. 172), p. EOP 056497 (describing "DNC Luncheon in LA/Hacienda Heights: 1000-5000 head/150-200 people" and "Reception in San Jose 150-200 guests/ticket price working out"); Deposition of Jacqueline Dycke, Aug. 8, 1997, p. 66.

²⁶⁷ See, e.g., Ex. 162 (John Norris, e-mail message to Robert Suettinger, April 15, 1996) ("Hsing Yun has invited the VP to visit the Hsi Lai Temple in LA. Hsing Yun would host a fundraising lunch for about 150 people in the VP's honor.").

²⁶⁸ John B. Emerson, e-mail to Bill [Wise], April 24, 1996 (Ex. 173) (listing Vice Presidential travel "LA — . . . DNC funder for lunch; then to San Jose for TV workshop event and funder").

Everyone on the Vice President’s staff involved with the Temple event thus knew exactly what was to occur. Despite the Vice President’s claim that the staffers who accompanied him did not know that the event was a fundraiser,²⁶⁹ Gore staffer Caren Solomon, who accompanied him on this trip,²⁷⁰ had been sent an e-mail by scheduler Jackie Dycke discussing the upcoming “fundraiser” and inviting her to the meeting at which Dycke’s “ticket price” memo had been distributed.²⁷¹

Moreover, Vice President Gore was apparently reminded that the April 29 luncheon was a fundraiser at the Temple itself. At least two of the guests who ate lunch with the Vice President in the Temple’s dining hall on April 29 recall specifically that DNC fundraising was actually discussed from the podium after lunch. Daniel Hesse, for example — one of the two INS officials invited by Matthew Gorman as a non-paying “VIP guest” of Hsia — told the Committee that at some point during the Vice President’s introductions by Don Fowler and Bob Matsui, “one speaker commented

²⁶⁹ Albert Gore interview *supra* note 233 (“I did not know that at the time. The people with me did not.”).

²⁷⁰ Schedule for the Vice President, April 29, 1996 (Ex. 174), at EOP 007195-96 (showing Solomon on manifest for Marine II, Air Force II, and Los Angeles motorcade).

²⁷¹ Ex. 171 (reference to “LA . . . DNC fundraising event[] on April 29” and invitation to meeting to discuss trip, sent to Solomon). The Minority has tried to argue that a line-by-line analysis of the briefing notes and the daily schedule given to the Vice President for the Temple event — and a comparison between these documents and those that accompanied certain other DNC events — would have suggested to him that it was not, in fact, a fundraiser. This reasoning is entirely spurious. As Deputy Chief of Staff David Strauss testified, the Vice President’s briefing materials for fundraisers did *not* always include information indicating that they were fundraisers and did *not* always indicate the amount to be raised. *See* Deposition of David Strauss deposition, Aug. 14, 1997, p. 240. Gore scheduler Ladan Manteghi testified similarly, conceding that *not* all fundraisers were described as such on the Vice President’s schedule and that this schedule would usually *not* include indication of monetary amounts to be collected at fundraising events. Deposition of Ladan Manteghi, Aug. 26, 1997, p. 33.

that ‘they had raised X amount of dollars.’”²⁷² More explicitly, Sherry Shaw, who sat at Table 8,²⁷³ recalls that one of the luncheon speakers took the podium and reassured the assembled guests that “they” had “double-checked,” and that it was “O.K. to give contributions at the Hsi Lai Temple.”²⁷⁴ She said that the man who made this comment “had a Japanese last name.”²⁷⁵ Vice President Gore

²⁷² Memorandum of Interview of Daniel Hesse, Aug. 5, 1997, p. 2.

²⁷³ Ex. 132, p. 3. According to this list, Sherry Shaw’s husband Gary sat at the head table with Vice President Gore. (Shaw is a naturalized U.S. citizen from the People’s Republic of China, and gave \$5,000 to the DNC at this Temple event.)

²⁷⁴ Sherry Shaw, sworn statement submitted to the Governmental Affairs Committee, Aug. 21, 1997 (Ex. 175). This story of “double-checking is generally corroborated by several other sources, among them Man Ho, Yi Chu, and Man Ya Shih — who have stated that the Temple had been advised prior to the event that the DNC had indicated that the Temple could host the luncheon even and that the holding of the event would not jeopardize the Temple’s tax-exempt status because it was not unprecedented to hold such activities at a religious venue.

Joint Statement of Venerable Man-Ho Shih, Venerable Man-Ya Shih, and Venerable Yi-Chu on Behalf of Themselves and the Hsi Lai Temple/Fo Kuang Shan Order, Sept. 4, 1997, p. 10 (Ex. 176). According to Man Ho, furthermore, Maria Hsia told a press conference after the Vice President’s visit on April 29, 1996 that the White House had specifically approved holding this sort of event at the Temple. *See* Man Ho deposition, pp. 182-83. This account of Hsia’s comments at the press conference is also corroborated by contemporaneous Chinese-language press coverage. *See* “Gore visits Hsi Lai Temple on the 20th” April 24, 1996 [translation of newspaper article by SA Becky Chan for the Governmental Affairs Committee], p. 1 (Ex. 177), (“After being briefed, the White House saw no conflict in Gore attending a fund raiser at a religious facility.”); Wong Mei, television news broadcast [translation and transcription from videotape produced by Hsi Lai Temple by SA Becky Chan for the Governmental Affairs Committee] (Ex. 178) (“After being briefed, the White House saw no inappropriateness in a fundraiser held at a religious institution; therefore, the White House agreed on Gore’s visit.”); *see also* Memorandum of Interview of Anonymous Chinese newspaper reporter, May 16, 1997, p. 2 (giving similar account).

²⁷⁵ Ex. 175 (noting that man who made comments had “a Japanese last name”). This presumably identifies the speaker as DNC Treasurer Robert Matsui, the only Japanese-American to address the assembled guests and the official who introduced Vice President Gore. Representative Matsui, however, citing “constitutional” considerations, has refused to discuss with the Committee any comments he may have made at any point. *See* Stanley Brand, letter to Paul Robinson, June 9, 1997 (Ex. 179).

was thus reminded of the event's fundraising purpose *at the event itself*, by the very DNC official who introduced him.²⁷⁶

* * *

In sum, it was or should have been obvious to everyone involved, including the Vice President, that the Hsi Lai Temple luncheon on April 29, 1996 was a DNC fundraiser. It is also now clear that most of the fundraising that occurred in connection with the Temple event was illegal — and that the donation-laundering orchestrated by Maria Hsia and carried out by Temple officials in connection with the Vice President's visit was not an aberration. Rather, it was part of a longstanding pattern of illegality undertaken in support of Democratic candidates in national elections that was established at least as early as September 1993 with the laundering of donations to the DNC in connection with another Vice Presidential event organized by Hsia and John Huang. More broadly, the Temple donation-laundering in 1996 was the culmination of a longstanding relationship of mutual assistance between Maria Hsia, John Huang, and the Vice President having its origins in the trip to Taiwan organized in late 1988 as part of James Riady's agenda for the Pacific Leadership Council.²⁷⁷

²⁷⁶ See April 29 Lunch: Event Procedures, undated (“Bob Matsui will introduce Vice President after Don Fowler’s speech [sic.]”) (Ex. 180); Handwritten note from Hsia & Associates files, undated (Ex. 181) (“Order of speeches: (1) M Hsing Yun (2) Don Fallow [sic] (Chairman) (3) Bob Mats. (4) VP Gore”). These remarks at the Vice President’s luncheon may help explain the mysterious disappearance of the videotape taken by King & I Productions of the April 29 event at the Hsi Lai Temple. As Man Ho explained in her testimony before the Governmental Affairs Committee, the videographers were told not to videotape the speeches after lunch but apparently exceeded their instructions. See Man Ho testimony, pp. 176-77. After the company did record the speeches, however — apparently including the abovementioned discussions of DNC fundraising that clearly show the Vice President to have known the nature of the Temple event — the Temple may have found it necessary to conceal the tape.

²⁷⁷ This close relationship between Hsia and covered persons under the Independent Counsel Act creates a “political conflict of interest” for the Attorney General that warrants the seeking of the

report

appointment of an independent counsel under 28 U.S. C. § 591(c)(1). *See* the section of the
on Charlie Trie and Ng Lap Seng's illegal fundraising.