

Reagan Library Topic Guide - Wedtech

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White House Office of Records Management (WHORM) [Subject Files](#)

White House Office of Records Management (WHORM) [Alphabetical Files](#).

The folders and case files listed on these topic guides may still have withdrawn material due to Freedom of Information Act (FOIA) restrictions. Most frequently withdrawn material includes national security classified material, personal privacy issues, protection of the President, etc.

WEDTECH

PLEASE NOTE – The largest amount of material for his topic guide is the Counsel to the President: Investigations collection. The series on the investigations of Lyn Nofziger/Ed Meese, which is the relevant material regarding Wedtech, is currently being arranged by the Library. Please see an archivist for access to this collection.

SCOPE NOTE

On February 2, 1987, Independent Counsel James C. McKay was appointed to investigate allegations that Franklyn (Lyn) Nofziger had violated the Ethics in Government Act by lobbying former Administration colleagues on behalf of various clients before legally allowed. This Act forbids former White House employees from lobbying members of the administration until a full year has elapsed since their departure. One of the clients named in the Independent Counsel appointment was the Wedtech Corporation, a New York City-based firm formerly known as Welbilt Electronic Die Corporation.

Prior to the appointment of the Independent Counsel, United States Attorney's Office for the Southern District, New York (Rudy Giuliani) had an ongoing criminal investigation of the Wedtech/Welbilt Corporation. Giuliani alleged Wedtech had been over-billing the federal government on various military and SBA contracts. There was also a question of misrepresenting themselves as a "minority" owned business through fraudulent stock certificates and questions about payments of bribes to various officials.

In the continuing course of the investigation by the U.S. Attorney's Office and the Independent Counsel, ethical and legal issues were raised about the conduct of Attorney General Edwin Meese III. Investigators focused on E. Robert Wallach, a personal friend of Attorney General Edwin Meese III, and his relationship to Wedtech. Wallach was paid over \$1.5 million by Wedtech for what he claimed were legal fees and advice. Since no documentation of this legal advice could be found, the U.S. Attorney's office viewed it as influence peddling and bribes for access to Mr. Meese's "eyes and ears." Subsequently, in May 1987, the Independent Counsel's investigation was broadened to include allegations of Meese's possible illegal involvement with Wedtech via Wallach.

Crucial witnesses refused to testify for Independent Counsel McKay, all pleading their fifth amendment rights. McKay had no inclination to grant them immunity as this would interfere

with the U.S. Attorney’s case. As McKay reported, “It was the considered judgment of the Independent Counsel and the United States Attorney for the Southern District of New York that continuation of the New York “Wedtech” investigation best served the ends of justice.

The Wedtech investigations conducted by the US Attorney’s Office for the Southern District of New York, and eventually the New York City District Attorney’s office led to the criminal convictions of several people in the New York area. These included Wedtech’s leaders, some local politicians, and two U.S. Congressmen – on racketeering and other charges. The White House continued to be involved with this on-going investigation providing documents and depositions of White House staff.

WHORM ALPHABETICAL FILE

Pinkhasov, Eduard

WHORM SUBJECT FILES

[FE010-01](#) case files 487211, 496272, 496276, 582937

[FG006-01](#) case file 628948

[FI005](#) case file 147658

[FI010-02](#) case file 099009

[JL002](#) case file 597796

[JL002-01](#) case file 445996

[PE001](#) case files 597110, 612521 (1)(2)

[PQ](#) case files 054537, 056940, 070771, 540211

[PU](#) case file 057544

WHITE HOUSE STAFF AND OFFICE FILES

COUNSEL TO THE PRESIDENT, OFFICE OF

Bryan, Patricia Mack: Files

OA 19247

PMB - WEDTECH/Civil Litigation

Keisler, Peter: Files

Box 60

WELBILT/WEDTECH: Lyn Nofziger (1)-(12)

Box 61

WELBILT/WEDTECH: Lyn Nofziger (13)-(19)

Inventory A (1)-(3)

Inventory B (1)(2)

Box 62
Inventory B (3)(4)
Inventory C (1)(2)
McKay Request Letters (1)-(5)
McKay Transmittal Letters
WELBILT/WEDTECH (1)-(4)

Box 63
WELBILT/WEDTECH (5)-(9)
WEDTECH (1)-(7)
WEDTECH: Newspaper Clippings (1)(2)

Counsel To The President, White House Office Of: Investigations

Series V: Lyn Nofziger/Wedtech/Edwin Meese Independent Counsel - James McKay:

Subseries A: Lyn Nofziger

CFOA 852

Independent Counsel Appointment

Lyn Nofziger: Document Request Letters (1)(2)

Lyn Nofziger: Document Transmittal Letters (1)-(3)

Lyn Nofziger: Wedtech: Classified Document Handling

Nofziger / Bragg Indictment

Lyn Nofziger: 11/10/1987, Memo Opinion

Lyn Nofziger: Document Requests / Submission Defense Counsel

Lyn Nofziger: Conviction

Lyn Nofziger: Trial

Witnesses

Lyn Nofziger: Probation Information

Lyn Nofziger: SDNY Indictment - Wallach, London, and Chinn

Wallach, E. Robert: Miscellaneous

Lyn Nofziger/Wedtech: Documents/ SDNY

Lyn Nofziger: Interview Notes

Lyn Nofziger: JBS Notes/File Memoranda (1)(2)

Lyn Nofziger: Trial Notes

Lyn Nofziger: Independent Counsel Pending Matters

Lyn Nofziger: Call Regarding Alan Grant

Lyn Nofziger: Senate Governmental Affairs Committee Investigation (1)-(4)

Lyn Nofziger: Senate Governmental Affairs Committee Report (1)-(4)

Lyn Nofziger/Wedtech: T. Kenneth Cribb, Jr.

Lyn Nofziger: Kenneth Duberstein Interview (1)(2)

Lyn Nofziger: Craig Fuller (1)-(3)

Lyn Nofziger: Meese Request to Review Documents

Lyn Nofziger: Wedtech / Meese (1)(2)

CFOA 853

Meese/Justice: Office of Professional Responsibility Investigations

Wedtech Spiral Notebooks

Wedtech/Meese: Request That Meese Step Down

Meese Telecommunications Waivers

Meese/Pipeline

Meese/Pipeline: Declassification Issue

Wedtech/Meese: Office of Government Ethics Guidance on McKay Report
 Meese/Ethics: News Clippings
 Meese/Inslaw: Newspaper Clippings
 Nofziger/Wedtech/Meese: Justice Investigation News Articles
 Wedtech/Meese: Meese Resignation
 Meese/Justice Resignations: News Clippings (1)-(4)
 Nofziger/Wedtech/Meese: McKay Report (1)-(12)
 Nofziger/Wedtech/Meese: McKay Report (President's Copy) (1)(2)
 McKay Report 07/18/1988 (1)-(15)

CFOA 854

Meese/Pipeline: News Articles (1)(3)
 Meese/Trips: News Clippings
 Nofziger/Meese/Wedtech: News Clippings Beginning 02/01/1988 (1)-(3)
 Nofziger/Meese/Wedtech: News Clippings (1)-(7)
 Meese / Pipeline (1)-(9)
 Meese / Pipeline (1)-(6)
 Lyn Nofziger - Classified Document Handling - (Classified)

CFOA 1115

Giuliani Transmittal Letters
 McKay Transmittal Letters (1)(2)
 McKay Request Letters (1)-(4)
 [Miscellaneous Duplicates of Correspondence]
 Lyn Nofziger: Deposit of White House Records
 Lyn Nofziger: Document Review Request by Nofziger
 Lyn Nofziger: Employment Status at White House
 Lyn Nofziger: POTUS Statement re: Meese, 05/11/1987
 Lyn Nofziger: Paul S. Stevens Recusal
 Lyn Nofziger: Appointment of Independent Counsel
 Lyn Nofziger: Document Request - U.S. Attorney Southern District of New York
 Lyn Nofziger: Document Submission to the U.S. Attorney, 02/13/1987
 Lyn Nofziger: Documents Given to FBI on 03/04/1987
 Lyn Nofziger: Meese Request to Review Documents
 Lyn Nofziger: Independent Counsel, Document Submission
 Lyn Nofziger: Independent Counsel, Document Request (1)-(3)
 Lyn Nofziger: Indictment
 Lyn Nofziger: 03/24/1987, Document Submission
 Lyn Nofziger: Executive Order Provided to Independent Counsel
 Lyn Nofziger: Post-Government Restriction Material (1)-(3)
 Lyn Nofziger: White House Pass
 Lyn Nofziger: Kimmitt and Duberstein Document Review 04/21/1987 (1)-(3)
 Lyn Nofziger: Document Submission to Independent Counsel, 04/01/1987
 Lyn Nofziger: Document Submission to U.S. Attorney S.D.N.Y., 04/02/1987 (1)(2)
 Lyn Nofziger: [February-] 05/13/1987, Document Submission to Independent Counsel
 (1)-(5)

1020 Series Not on your List

[1020 Series Not on Your List: Miscellaneous Documents]

McKay, Newspaper Articles

[Document Series Index]

[Documents re: Counsel Office Consideration of Waiver / Recusal Matters] (1)(2)
 Wedtech - Levin
 [Documents Submitted to Independent Counsel McKay Dated] March 1979 (1)(2)
 [Documents Submitted to Independent Counsel McKay April 1979-April 1980] (empty)
 [Documents Submitted to Independent Counsel McKay Dated] May 1980
 [Documents Submitted to Independent Counsel McKay Dated June 1980-July 1980]
 (empty)
 [Documents Submitted to Independent Counsel McKay Dated] August 1980
 [Documents Submitted to Independent Counsel McKay Dated] September 1980
 [Documents Submitted to Independent Counsel McKay Dated] October 1980 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] November 1980
 [Documents Submitted to Independent Counsel McKay Dated] December 1980 (empty)
 [Documents Submitted to Independent Counsel McKay Dated] January 1981
 [Documents Submitted to Independent Counsel McKay Dated] February 1981
 [Documents Submitted to Independent Counsel McKay Dated] March 1981
 [Documents Submitted to Independent Counsel McKay Dated] April 1981
 [Documents Submitted to Independent Counsel McKay Dated] May 1981
 [Documents Submitted to Independent Counsel McKay Dated] June 1981 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] July 1981 (1)(2)

CFOA1116

[Documents Submitted to Independent Counsel McKay Dated] August 1981 (1)-(3)
 [Documents Submitted to Independent Counsel McKay Dated] September 1981
 [Documents Submitted to Independent Counsel McKay Dated] October 1981 (1)-(6)
 [Documents Submitted to Independent Counsel McKay Dated] November 1981 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] December 1981 (1)-(3)
 [Documents Submitted to Independent Counsel McKay Dated] January 1982 (1)-(3)
 [Documents Submitted to Independent Counsel McKay Dated] February 1982 (1)-(3)
 [Documents Submitted to Independent Counsel McKay Dated] March 1982 (1)-(5)
 [Documents Submitted to Independent Counsel McKay Dated] April 1982 (1)-(5)
 [Documents Submitted to Independent Counsel McKay Dated] May 1982
 [Documents Submitted to Independent Counsel McKay Dated] June 1982 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] July 1982 (1)-(8)
 [Documents Submitted to Independent Counsel McKay Dated] August 1982 (1)-(4)
 [Documents Submitted to Independent Counsel McKay Dated] September 1982 (1)-(3)
 [Documents Submitted to Independent Counsel McKay Dated] October 1982 (1)-(6)

CFOA 1117

[Documents Submitted to Independent Counsel McKay Dated] November 1982 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] December 1982 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] January 1983
 [Documents Submitted to Independent Counsel McKay Dated] February 1983
 [Documents Submitted to Independent Counsel McKay Dated] March 1983 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] April 1983 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] May 1983
 [Documents Submitted to Independent Counsel McKay Dated] June 1983 (1)-(5)
 [Documents Submitted to Independent Counsel McKay Dated] July 1983 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] August 1983
 [Documents Submitted to Independent Counsel McKay Dated] September 1983
 [Documents Submitted to Independent Counsel McKay Dated] October 1983

[Documents Submitted to Independent Counsel McKay Dated] November 1983 (1)-(6)
 [Documents Submitted to Independent Counsel McKay Dated] December 1983 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] January 1984
 [Documents Submitted to Independent Counsel McKay Dated] February 1984
 [Documents Submitted to Independent Counsel McKay Dated] March 1984 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] April 1984
 [Documents Submitted to Independent Counsel McKay Dated] May 1984
 [Documents Submitted to Independent Counsel McKay Dated June 1984] (empty)
 [Documents Submitted to Independent Counsel McKay Dated] July 1984
 [Documents Submitted to Independent Counsel McKay Dated] August 1984
 [Documents Submitted to Independent Counsel McKay Dated September 1984] (empty)
 [Documents Submitted to Independent Counsel McKay Dated] October 1984
 [Documents Submitted to Independent Counsel McKay Dated] November 1984
 [Documents Submitted to Independent Counsel McKay Dated December 1984] (empty)
 [Documents Submitted to Independent Counsel McKay Dated] 1985
 [Documents Submitted to Independent Counsel McKay Dated] 1986 (1)(2)
 [Documents Submitted to Independent Counsel McKay Dated] 1987 (1)-(5)

CFOA 1118

[Documents Submitted to Independent Counsel McKay Dated] "No Dates" (1)-(11)
 McKay, Telephone/Visitor Logs [Copies Received] (1)-(12)
 McKay Numerical File (File Divider)
 Top Secret, Bates Stamped, 12/04/1987
 White House 10.200.000
 Miscellaneous Documents, 101-117 (1)(2)
 White House 10.700.000 -, 3/18
 Lyn Nofziger: Document Submission to U.S. Attorney- 74-100, 02/13/1987: Copies
 from OA 9461 - Welbilt folder (1)(2)
 Lyn Nofziger: Document Submission to US Attorney - 74-100, 02/13/1987: Copies
 from OA 11830
 Lyn Nofziger: Document Submission to US Attorney - 74-100, 02/13/1987: Copies
 from OA 8967
 Lyn Nofziger: Document Submission to US Attorney - 74-100, 02/13/1987: Copies
 from OA 8975
 Lyn Nofziger: Document Submission to US Attorney - 74-100, 02/13/1987: Copies
 from OA 9100
 Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from
 OA 1298
 Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from
 OA 3002
 Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from
 OA 3108
 Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from
 OA 3109
 Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from
 OA 3110
 Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from
 OA 3111
 Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from
 OA 4540

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 6048

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 6364

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 6517

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 8490

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 3112

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 7121

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 7995

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 7996

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 8116

Lyn Nofziger: Document Submission to US Attorney - 1-73, 02/13/1987: Copies from OA 9802

Top Secret, Bates Stamped, 12/04/1987 (1)-(3)

Miscellaneous Documents, 118-123 10.000.002

Various Documents, 124-130 10.000.002

Jenkins Welbilt File 131-157 10.000.002 (1)-(7)

Lyn Nofziger: Documents Submitted to Independent Counsel on 03/06/1987, B1-B77
Produced 03/06/1987 1030-10300411 (1)-(10)

CFOA 1119

Executive Orders & White House Directories C1-C8 produced 03/11/1987
10.500.000-10.500.359 (1)-(5)

ACS Summaries D-1-D-2 produced 03/12/1987 10.400.001-10.400.002

Telephone Message & "Deletions from WH during January 1982" E-1-E-3
Produced 03/16/1987 10.800.001-10.800.005

Telephone Logs F-1-F-8 Produced 03/17/1987 10.600.001-10.600.008

Lyn Nofziger, 03/24/1987, Document Submission G1-G127 Produced 03/24/1987
10.900.400-10.900.322 (1)-(11)

Request of 03/23/1987 H-1-H-2 Produced 03/26/1987

Various Documents (not Bates Stamped) Produced 04/01/1987 10.120.000-.289 (1)-(6)

Lyn Nofziger: Document Submission 04/08/1987 (not Bates Stamped) Produced
04/08/1987 10.130.001-.526 (1)-(12)

04/06/1987 Request for A-10 Documents (not Bates Stamped) Produced 04/10/1987

Lyn Nofziger: Document Submission, 04/14/1987 to Independent Counsel (not Bates
Stamped) Produced 04/14/1987 10150000-0215 (1)-(5)

Request of 04/06/1987 and 04/15/1987 for OMB Records on A-10, Photo of Talenti &
Documents re: Wallach (not Bates Stamped) Produced 04/17/1987 10160000-091
(1)(2)

Request of 03/06/1987 re: Edwin Meese and Request of 04/06/1987 (not Bates
Stamped) Produced 04/22/1987 10170000-083 (1)(2)

Lyn Nofziger: Document Submission to Independent Counsel-04/27/1987 (not Bates
Stamped) Produced 04/27/1987 10180000-0236 (1)-(5)

CFOA 1120

Requests of 04/06/1987 and 05/08/1987 for Various Documents (not Bates Stamped Copies) Produced 05/13/1987 10190000-049 (1)(2)
 Office of Cabinet Affairs: Tracking Sheet, Visitor Logs (1)-(5)
 [White House Documents Provided 01/06/1988 and 01/08/1988 – Exhibit Copies] (1)-(6)
 Lyn Nofziger: Document Submission of 06/05/1987 (not Bates Stamped) Produced 06/05/1987 10210000-0746
 [Document Submission of 12/31/987 10310004-048]
 Request of 04/06/1987 and 04/15/1987 for OMB Records on A-10, Photo of Talenti & Documents re: Wallach (Bates Stamped) Produced 04/17/1987 (1)-(3)
 Requests of 04/06/1987 and 05/10/1987 for Various Documents (Bates Stamped Copies) Produced 05/13/87
 Requests of 03/06/1987 re: Nofziger & Meese & Request of 04/23/1987 re: Visitor Logs (Bates Stamped) Produced 04/27/1987 (1)-(5)
 Request of 03/06/1987 re: Edwin Meese and Request of 04/06/1987 re: A-10 (Bates Stamped) Produced 04/22/1987 (1)(2)
 04/06/1987 Request for Documents (Bates Stamped Copies) Produced 04/14/1987 (1)-(6)
 04/06/1987 Request for A-10 Documents (Bates Stamped) Produced 04/10/1987
 Various Documents (Bates Stamped) Produced 04/01/1987 (1)-(7)

CFOA 1121

[Box 7 Inventory]
 Lyn Nofziger: Document Submission – 04/08/1987 (1)-(6)
 Lyn Nofziger: Document Submission of 06/11/1987 (not Bates Stamped) 10220000-0626 (1)-(15)
 Lyn Nofziger: Document Submission of 06/15/1987 (not Bates Stamped) 10230000-009
 06/19/1987, Request for Visitor Logs (not Bates Stamped) Produced 07/06/1987 10230000-087 (1)-(2)
 06/02/1987 Request for Documents on Particular Individuals (not Bates Stamped) Produced 07/31/1987 10240000-0340 (1)-(8)
 Documents from WH Central Files and Edwin Meese, III Produced, 09/11/1987 (1)-(4)
 WH Records, OMB Records, WH Visitor logs, Produced 10/02/1987-10260000-0367 (1)-(7)

CFOA 1122

Documents from Fuller, Jenkins, Harper, ORM Central Files, and Presidential Personnel (not Bates Stamped) Produced 10/16/1987 10270000-0786 I (1)-(16)
 Documents from Fuller, Jenkins, Harper, ORM Central Files, and Presidential Personnel (not Bates Stamped) Produced 10/16/1987 II (1)-(5)
 10/19/1987 Request, Personnel Files for Anderson & Artiano, James Cicconi Files & WH Counsel Files (not Bates Stamped) Produced 11/20/1987 10280000-068
 10/19/1987 Request Personnel Files for Anderson & Artiano, James Cicconi Files & WH Counsel Files (Bates Stamped) Produced 11/20/1987 10280000-068
 Aqaba Pipeline (not Bates Stamped) 12/04/1987 1029 Series (1)-(5)
 12/30/1987 (1031 Series - for Unclassified Only) (1)-(4)
 01/14/1988 Submission, Bates Stamped, 1034 (1)-(6)
 01/14/1988 Submission, not Bates Stamped 1034 (1)-(6)
 Submission 01/28/1988, WH Counsel Files, Bates Stamped, 1036 (1)(2)

Transmittal 03/23/1988 (not Bates Stamped)

Transmittal 03/28/1988 (not Bates Stamped)

OA 15603

[Memo for the Record re: Documents Attached]

[Exhibits: 100-105]

[Exhibits: 100-105]

[Exhibits: 107]

[Exhibits: 108-112]

[Exhibits: 113-120]

[Exhibits: 121A-127]

[Exhibits: 128-134]

[Exhibits: 135-209]

[Exhibits: 211-225]

[Exhibits: List of White House Documents-227]

[Exhibits: 229-248]

[Exhibits; 249-314]

[Exhibits: 315-316]

[Exhibits: 317-326]

[Exhibits: 327-350]

[Exhibits: 351-357]

[Exhibits: 358-368]

[Exhibits: 369]

[Exhibits: 370] (1)(2)

[Exhibits: 380-399]

[Exhibits: 401-517]

Working Documents (1)-(4)

OA 15745

File Return & Nofziger (1)-(6)

Peter Keisler/Nofziger Miscellaneous

Original File Documents with Exhibit Numbers (1)(2)

[Note by Terry Good]

Miscellaneous Research & File Search for Certification & Questions per Jan Vranich & Terry Good (1)-(6)

WH Documents, Exhibit List & Notes - Tom Taggart, Jr.

Deletion List & Document Copies Terry Good & Peter Keisler (1)-(7)

Rebuttal Exhibits

Hold Documents – ORM (Office of Records Management) Subject (1)(2)

Trial – Nofziger Documents – Good/Keisler – Notes & Miscellaneous)

Series V: Lyn Nofziger/Wedtech/Edwin Meese Independent Counsel - James McKay:

Subseries B: Edwin Meese Investigation, 1984-1986

CFOA 573

McKean, John [Documents Provided to the Independent Counsel]

Pendleton Documents Copied for Stein's Office

Copies of Pendleton Documents Supplied to Garment's Office

Senior Staff Notes & Agendas, RR Approval Memo re Pendleton

CFOA 574

Assembled by Counsel's Office (Irrelevant or Duplicative of Others): John R.
McKean-Postal Board
RJR File on Meese Investigation: Copies of Senior Staff Notes, Agendas on
Pendleton, Turnage

COUNSELLOR TO THE PRESIDENT, OFFICE OF
Jenkins, James E.: Files

Box 9
WELBILT (1)-(5)
WELBILT
WELBILT - SPURLOCK, LAMA
WELBILT: Wednesday, 05/19/1982 (1)(2)

Meese, Edwin III, Files

OA 9461
Welbilt Electronics, Inc - Wallach (1)(2)