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PROCEEDINGS OF THE UNITED STATES SENATE

IN THE

IMPEACHMENT TRIAL OF PRESIDENT WILLIAM JEFFERSON CLINTON

VOLUME III: DEPOSITIONS AND AFFIDAVITS

VOLUME III OF IV

FEBRUARY 12, 1999.—Ordered to be printed

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OFFICE OF THE SECRETARY OF THE SENATE

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BRUCE E. KASOLD, *Chief Counsel*
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UNANIMOUS CONSENT AGREEMENT

In the Senate of the United States

February 12, 1999

Mr. LOTT. I ask unanimous consent that the Secretary be authorized to include these statements [of Senators explaining their votes], along with the full record of the Senate's proceedings, the filings by the parties, and the supplemental materials admitted into evidence by the Senate, in a Senate document printed under the supervision of the Secretary of the Senate, that will complete the documentation of the Senate's handling of these impeachment proceedings.

The CHIEF JUSTICE. Without objection, it is so ordered.

To the memory of Raymond Scott Bates,
Legislative Clerk of the Senate,

who, until his untimely and tragic accidental death on February 5, 1999, in the midst of these proceedings, brought to the conduct of this trial the constant dedication, skill, and professionalism that characterized his Senate career. Scott represented the best of the Senate staff who work tirelessly to support the institution and its members.

FOREWORD

This document contains the full record of the United States Senate proceedings in the impeachment trial of President William Jefferson Clinton. Its purpose is to preserve for the future use of the Senate, the American people, and historians the formal record of the only Presidential impeachment trial of the 20th century. Together with the 24-volume Senate Document 106–3, which contains all publicly available materials submitted to or produced by the Judiciary Committee of the House of Representatives, these four volumes represent the entire official record of the impeachment actions against President Clinton.[1]

The present four volumes include the Senate proceedings in open session; filings by the parties; supplemental materials received in evidence that were not part of the House record, such as affidavits and depositions; floor statements of Senators in open session expressing their views regarding the proceedings; and statements delivered in closed deliberations that individual Senators elected to make public.

The document is divided into four sections—

Volume I: Preliminary Proceedings
Volume II: Floor Trial Proceedings
Volume III: Depositions and Affidavits
Volume IV: Statements of Senators Regarding the Impeachment Trial of President William Jefferson Clinton

VOLUME I: PRELIMINARY PROCEEDINGS

This volume contains the portion of the Senate proceedings that occurred before the actual trial commenced. On December 19, 1998, the House of Representatives adopted two articles of impeachment against President Clinton (House Resolution 611, 105th Congress) and a subsequent resolution appointing managers on the part of the House (House Resolution 614, 105th Congress).

Because the Senate of the 105th Congress had already completed its business and adjourned sine die, the House managers, in the late afternoon of December 19, 1998, delivered the articles of impeachment to the Secretary of the Senate. The Senate of the 106th Congress convened and organized on January 6, 1999, and the House notified the Senate that it had reappointed the managers (House Resolution 10, 106th Congress). On January 7, 1999, the House managers exhibited the articles of impeachment to the Senate and the Chief Justice of the United States, as presiding officer

[1] The Senate, by a unanimous-consent agreement of February 12, 1999, authorized the Secretary of the Senate to oversee the printing of the Senate proceedings in order to complete the documentation of the impeachment trial.

during the impeachment trial, took the prescribed oath, as did all Senators.

On January 8, 1999, the Senate unanimously directed that the summons be issued to President Clinton and that his answer to the articles be filed, together with the response of the House of Representatives (Senate Resolution 16, 106th Congress). This resolution admitted into evidence the materials submitted by the House Judiciary Committee and authorized their publication. It also allowed the parties to file preliminary motions (none was filed), established a schedule for the filing of trial briefs by the parties, and established further procedures for the conduct of the trial. Although all these documents were previously printed in Senate Document 106–2—as well as the text of the provisions of the United States Constitution applicable to impeachment and the Rules of Procedure and Practice of the Senate When Sitting in Impeachment Trials—they are reprinted here for ease of reference.

VOLUME II: FLOOR TRIAL PROCEEDINGS

This volume reproduces the full record of the Senate floor proceedings in the impeachment trial as provided under Senate Resolution 16. The resolution first permitted the parties an extended period to make their presentations. The managers presented their case on behalf of the House of Representatives on January 14, 15, and 16, 1999. Counsel for the President presented their case on January 19 and 20, 1999. The Senate then devoted January 22 and 23, 1999, to posing questions to the House managers and counsel.

Senate Resolution 16 also provided that, at the end of the question-and-answer period, the Senate would consider separately a motion to dismiss and a motion to subpoena witnesses and to present additional evidence not in the record. On January 25, 1999, the Senate heard argument on the motion to dismiss and, on January 26, 1999, considered the motion by the House managers to call witnesses and admit additional evidence. The Senate voted to deny the motion to dismiss and to grant the motion to subpoena witnesses.

On January 28, 1999, the Senate established procedures for the taking of depositions (Senate Resolution 30), and three witnesses were deposed on February 1, 2, and 3, 1999. On February 4, 1999, the Senate heard argument and voted on motions to admit the deposition testimony into evidence, to call witnesses to testify on the Senate floor, and to proceed directly to closing arguments. The portions of the deposition transcripts admitted into evidence are reproduced in this volume, while the full transcripts of the three depositions appear in Volume III. Both parties presented evidence to the Senate on February 6, 1999.

On February 8, 1999, the parties presented final arguments to the Senate. The Senate then considered proposals by various Senators to suspend the Senate impeachment rules to permit deliberation in open session, but all deliberations on motions and on the articles of impeachment occurred in closed session. (The proceedings in closed session are not published here, but statements that Senators elected to make public are printed in Volume IV.) Volume II concludes with the record of the February 12, 1999, vote

and judgment of the Senate to acquit President Clinton on both articles of impeachment.

VOLUME III: DEPOSITIONS AND AFFIDAVITS

This volume reproduces the complete transcripts of the depositions taken by the Senate of witnesses Monica S. Lewinsky, Vernon E. Jordan, Jr., and Sidney Blumenthal. It also contains the affidavits of Christopher Hitchens, Carol Blue, and R. Scott Armstrong, which were admitted into evidence by a unanimous-consent agreement of February 12, 1999.

VOLUME IV: STATEMENTS OF SENATORS REGARDING THE IMPEACHMENT TRIAL OF PRESIDENT WILLIAM JEFFERSON CLINTON

By unanimous consent, the Senate agreed to provide each Senator an opportunity to place in the Congressional Record a statement describing his or her own views on the impeachment. The statement could, if a Senator so chose, be a statement he or she had delivered during closed deliberations. Since not all Senators chose to publish their remarks, the fact that a statement of a particular Senator does not appear in Volume IV does not mean that the Senator did not address the Senate during its closed deliberations.

The publication of these four volumes, supplemented with Senate Document 106–3, contributes to a fuller understanding of the way in which the Senate conducted these important and historic proceedings.

GARY SISCO,
Secretary of the Senate.

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[1] On December 19, 1998, the House of Representatives agreed to H. Res. 611, 105th Cong., the Articles of Impeachment, [144 Cong. Rec. H12040–42 (daily ed. Dec. 19, 1998)] and H. Res.

614, 105th Cong., which provided for the appointment of managers and procedures relating to impeachment proceedings [id. at H12042–43].

[2] The House of Representatives agreed to H. Res. 10, 106th Cong., on January 6, 1999 [145 Cong. Rec. H216–17 (daily ed. Jan. 6, 1999)].

[3] The Appendix to Trial Memorandum of President William Jefferson Clinton, consisting of exhibits, was filed separately on January 20, 1999, but is inserted here for ease of reference.

[4] For ease of reference, the documents contained in S. Doc. 106–2, i.e., the pertinent constitutional provisions, the Senate Impeachment Rules, the Articles of Impeachment, the Answer of President Clinton, and the Replication of the House of Representatives, are reprinted in this publication. Separately, the Senate admitted into evidence and authorized the printing, pursuant to S. Res. 16, 106th Cong., of the publicly available materials submitted to or produced by the House Judiciary Committee, including transcripts of public hearings or mark-ups and any materials printed by the House of Representatives or the House Judiciary Committee pursuant to H. Res. 525 and H. Res. 581, 105th Cong. (1998). That evidentiary record, S. Doc. 106–3 (1999) [24 vols.], is not reproduced here.

[5] The unanimous-consent agreement of February 9, 1999, allowed each Senator to place in the Congressional Record his or her statement delivered during closed deliberations. Not all Senators chose to publish their remarks; the fact that a statement of a particular Senator does not appear here does not mean that Senator did not address the Senate during the closed sessions. Additionally, the unanimous-consent agreement of February 12, 1999, allowed Senators to have statements and opinions explaining their votes printed in the Congressional Record.

[6] Sen. Specter submitted an additional statement on February 12, see p. 2715 below.

[7] Sen. Feingold submitted an additional statement on February 22, see p. 3042 below.

[8] Sen. Bond submitted an additional statement on February 23, see p. 3058 below.

[9] Sen. Inhofe submitted an additional statement on February 12, see p. 2987 below.

[10] Sen. Leahy submitted additional statements on February 12 and February 23, see pp. 2996, 3090, 3102 below.

[11] Sen. Dodd submitted additional statements on February 23, see pp. 3099 and 3100 below.

[12] Sen. Reed submitted an additional statement on February 24, see p. 3103 below.

[13] Sen. Sessions submitted an additional statement on February 23, see p. 3094 below.

IN THE SENATE OF THE UNITED STATES

SITTING FOR THE TRIAL OF THE

IMPEACHMENT OF WILLIAM JEFFERSON CLINTON,

PRESIDENT OF THE UNITED STATES

VIDEO DEPOSITION OF

MONICA S. LEWINSKY

Monday, February 1, 1999

Washington, D.C.

The videotaped deposition of MONICA S. LEWINSKY, taken pursuant to Senate Resolution 30, convened at 9:03 a.m., at the Mayflower Renaissance Hotel, Presidential Suite, Washington, D.C., when were present on behalf of the parties:

APPEARANCES:

On Behalf of President William Jefferson Clinton:

CHERYL D. MILLS, ESQ.
Deputy Counsel to the President
The White House
Washington, D.C. 20510

DAVID KENDALL, ESQ.
NICOLE K. SELIGMAN, ESQ.
Williams & Connolly
725 12th Street, N.W.
Washington, D.C. 20005

On Behalf of the Managers of the House of Representatives:

HON. ED BRYANT
HON. JAMES E. ROGAN

APPEARANCES: (continued)

On Behalf of the Deponent Monica S. Lewinsky:

JACOB A. STEIN, ESQ.
Stein, Mitchell & Mezines
1100 Connecticut Avenue, N.W.
Washington, D.C. 20036

PLATO CACHERIS, ESQ.
SYDNEY HOFFMANN, ESQ.
PRESTON BURTON, ESQ.
Law Offices of Plato Cacheris
Suite 730
1100 Connecticut Avenue, N.W.
Washington, D.C. 20036

Senators Present:

HON. MIKE DeWINE
HON. PATRICK J. LEAHY
HON. FRED THOMPSON
HON. ARLEN SPECTER
HON. CHRISTOPHER DODD
HON. JOHN EDWARDS

Senate Counsel Present:

THOMAS GRIFFITH, ESQ.
Legal Counsel
MORGAN FRANKEL, ESQ.
Deputy Legal Counsel
Senate Legal Counsel
642 Hart Office Building
Washington, D.C. 20510-7250

House of Representatives Counsel Present:

THOMAS M. SCHIPPERS, ESQ.
STEPHEN PINKOS, ESQ.
Committee on the Judiciary
U.S. House of Representatives
HS-187 Ford House Office Building
Washington, D.C. 20515

COURT REPORTERS:

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THOMAS C. BITSKO, CVR-CM
Miller Reporting Company, Inc.
507 C Street, N.E.
Washington, D.C. 20002

VIDEOGRAPHERS:

THOMAS W. OLENDER, CLVS
GREGORY K. SMITH
Video Age, Inc.
1522 K Street, N.W., Suite 215
Washington, D.C. 20005

- - -

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By Mr. Bryant	19

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1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: We are going on the record at 9
3 o'clock a.m.

4 SENATOR DeWINE: Good morning. We are on the
5 record today, February 1st, 1999.

6 I am Senator Mike DeWine. I am here along with
7 Senator Pat Leahy, and I have been appointed by the Majority
8 Leader and the Democrat Leader of the Senate has appointed
9 Senator Leahy. We are acting jointly today to preside over
10 this deposition which is being taken in the Trial of the
11 Impeachment of William Jefferson Clinton, President of the
12 United States.

13 This deposition is being conducted pursuant to
14 Senate Resolution 30, which the Senate considered and agreed
15 to on January 28th, 1999. Section 201 of that resolution
16 authorized the issuance of a subpoena to Monica S. Lewinsky
17 for the taking of testimony on oral deposition. The
18 subpoena was issued by the Chief Justice of United States on
19 Friday, January 29, 1999. Counsel for Ms. Lewinsky agreed
20 to accept service of that subpoena, which was made on that
21 same date.

22 By unanimous consent of the Senate, the Majority
23 Leader and the Democratic Leader were authorized, acting
24 jointly, to determine the time and place for the taking of
25 the depositions authorized by Senate Resolution 30. The

5

1 Leaders, through Senate Legal Counsel, have conferred with
2 counsel for Ms. Lewinsky, the House Managers, and the
3 President's counsel, and have determined, acting jointly,
4 that Ms. Lewinsky's deposition should take place on this
5 date, Monday, February 1st, 1999, in the Mayflower
6 Renaissance Hotel, here in Washington D.C., beginning at
7 9:00 a.m.
8 By unanimous consent of the Senate, the time
9 allotted for examination of Ms. Lewinsky by the parties
10 shall not exceed 8 hours. Each side may examine Ms.
11 Lewinsky for up to 4 hours. Time consumed by objections
12 shall not be charged to the questioning period. Senate
13 Legal Counsel will advise the presiding officers of the time
14 spent in questioning by the parties. Senator Leahy and I
15 anticipate that a 5-minute break will be taken approximately
16 every hour, and that the deposition will recess for one hour
17 for lunch at approximately 1:00 p.m.
18 Ms. Lewinsky, as I indicated to you a few minutes
19 ago, any time that you wish to take a break, just let us
20 know--
21 MS. LEWINSKY: Thank you.
22 SENATOR DeWINE: --and we'll certainly do that.
23 At any point if the reporter or videographer needs
24 a pause in the proceedings for technical reasons, please
25 make that known to us so that we can accommodate you as

1 well.

2 Now, according to the terms of Senate Resolution
3 30, the scope of the examination of Ms. Lewinsky by the
4 parties shall be limited to the subject matters reflected in
5 the Senate record. The questioning will begin first by the
6 House Managers, to be followed by the President's counsel.
7 Subsequent questioning by the parties will be permitted
8 within the time allotted, but the scope of such questioning
9 shall be limited to the subject matter of the prior
10 questioning.

11 Any objections by counsel for the witness or the
12 parties shall be directed to the Presiding Officer Senators,
13 who have authority to rule, as an initial matter, upon any
14 question arising out of the deposition. Rulings of the
15 Presiding Officers may be appealed to the full Senate
16 following the completion of this deposition. The Senate
17 will consider any such appeals when it next convenes in this
18 impeachment proceeding on Thursday, February 4th. The
19 reporter shall note any objection upon the record, but the
20 examination shall continue. It shall proceed, and the
21 witness shall answer such question. The witness may refuse
22 to answer a question only when necessary to preserve a
23 legally recognized privilege or a constitutional right.

24 Section 205 of Senate Resolution 30 requires that
25 these depositions be conducted in private. Attendance at

7

1 this deposition is limited to the witness, Ms. Lewinsky, her
2 counsel, the House Managers and counsel, counsel for the
3 President, the Presiding Officer Senators, Senate Legal
4 Counsel and Deputy Senate Legal Counsel, Senate personnel
5 whose presence is required as determined by the Majority
6 Leader and the Democratic Leader, and those persons whose
7 attendance is required to make and preserve a record of the
8 proceedings.
9 Now, I think we should note that according to the
10 terms of Section 205, quote, "All present must maintain the
11 confidentiality of the proceedings," end of quote. Now, for
12 Senators and Senate employees, they should be aware that
13 this deposition is a, quote, "confidential proceeding of the
14 Senate," end of quote, under Senate Rule 29.5. This
15 deposition may be discussed only with Members of the Senate
16 and staff designated by Members. House Managers and House
17 employees may only discuss this deposition with fellow
18 Managers and staff designated by the Managers. The
19 President's counsel may only discuss this deposition with
20 the President and counsel and staff representing the
21 President in this matter. Ms. Lewinsky and her counsel may
22 only discuss this deposition with each other.
23 This injunction remains and will remain in effect
24 unless ordered otherwise by the United States Senate.
25 Moreover, any record of this deposition made available must

1 similarly be kept confidential until further order of the
2 United States Senate. All persons are admonished to conduct
3 themselves accordingly.
4 A videotaped record and transcription of this
5 deposition is being made and will be made available for the
6 review by Members of the Senate and for review by one
7 designated staff member per Senator, by the Chief Justice of
8 the United States, the House Managers, the President's
9 counsel, and the witness' counsel for their review in
10 connection with the impeachment proceedings.
11 As I mentioned earlier, I am joined today as
12 Presiding Officer of this deposition by Senator Patrick
13 Leahy.
14 Senator Leahy, do you have anything that you would
15 like to add at this point? And I will pass the microphone
16 to you.
17 SENATOR LEAHY: Thank you, Senator DeWine.
18 This may seem awfully formal going through all of
19 these things, Ms. Lewinsky, but Senator DeWine will be
20 swearing you in, in just a minute or so, and I just wanted
21 to emphasize that you are aware of the fact this is being
22 taken under Senate Resolution 30 and it is in the Senate
23 Trial of the Articles of Impeachment against President
24 Clinton.
25 And we will be--Senator DeWine and I will be the

9

1 Presiding Officers on this. Senator Dodd and Edwards are
2 here in the room now and will probably be moving into my
3 seat at some point.
4 When Senator DeWine administers the oath that's
5 prescribed by Senate Rules, you will be asked to swear or
6 affirm that your testimony will be truthful. In that
7 connection, I wish to advise you that should a witness fail
8 to testify truthfully, that witness could violate a criminal
9 law that prohibits false material statements to Congress,
10 which I am sure you understand. And if you have any
11 questions about this, of course, you should feel free to
12 consult with your attorneys that I note for the record are
13 here with you. And you should be given an opportunity to
14 review the transcript of your testimony here today and to
15 make any clarifications, corrections, or changes you feel
16 necessary once you see it.
17 Now, the time frame set by the Senate resolution
18 is such that your opportunity may be limited to 48 hours,
19 and I'd mention that also for your counsel's sake, and I
20 would hope that we would have the transcript available to
21 you and your counsel by tomorrow morning.
22 We are doing this deposition--oh, and also I
23 understand that the House Managers would provide any
24 exhibits 18 hours in advance, under our rules, with the
25 exception of press accounts.

10

1 And we're conducting this in private. Senator
2 DeWine has indicated the other people in this room are being
3 instructed they are to keep this matter confidential until
4 and unless the Senate decides whether it be admitted as
5 evidence in the impeachment trial. And while I want--I
6 always hate to suggest things to our colleagues in the other
7 body. Under these rules, that rule applies also to the
8 House Managers--I'd just note that for the record--and to
9 the President's counsel.
10 The Senate Sergeant-at-Arms is authorized to make
11 the transcript and videotape available. The
12 Sergeant-at-Arms is here. And in accordance with the
13 provisions that govern these proceedings, the House Managers
14 or the President's counsel may later this week ask the
15 Senate to admit into evidence in the impeachment trial the
16 transcript of this deposition, the videotape of it, or some
17 portions of it. The Senate then has to vote and decide
18 whether that would be allowed or not and determine in which
19 way it may become public, but if the Senate were to vote for
20 any part or all of the deposition to become public, Ms.
21 Lewinsky, it would.
22 And the House Managers or the President's counsel
23 may also ask that you be subpoenaed by the Senate to present
24 live testimony before the Senate. That would happen only if
25 the Senate voted to do that. I want to make sure you

11

1 understand that.

2 I have a feeling all of these things I'm telling

3 you have already been explained to you, but you understand

4 we want to make clear on the record.

5 And you should feel at any time that you can

6 consult with your attorneys during this. Senator DeWine has

7 already said that if you were to ask for such a break, we

8 would agree to it. And if there is going to be a break, if

9 we are going to go off the record, then it would be on--it

10 would be on the ruling of either Senator DeWine or I. So if

11 you need to take a break, feel--feel free to let either one

12 of us know that, or whoever might be sitting here presiding,

13 if we are replaced at any time by anybody.

14 I think that covers just about everything.

15 MS. LEWINSKY: Thank you.

16 SENATOR LEAHY: I have no other questions.

17 Oh, I'm sorry.

18 MR. STEIN: Senators DeWine and Leahy, I'd like to

19 make a statement, a very short one.

20 My name is Jake Stein. I'm with Plato Cacheris

21 and Sydney Hoffmann and Preston Burton. We represent Ms.

22 Lewinsky.

23 Ms. Lewinsky is here today pursuant to a subpoena

24 issued by the Senate of the United States. The Independent

25 Counsel entered into a transactional immunity agreement with

1 Ms. Lewinsky on July 28th, 1998. Under the terms of the
2 agreement, Ms. Lewinsky agreed to cooperate with a request
3 of the Independent Counsel concerning testimony, including
4 testimony before Congress.
5 The Independent Counsel has requested that Ms.
6 Lewinsky testify at this deposition, and the Independent
7 Counsel has stated that this testimony is within the
8 transactional immunity agreement of July 28th in connection
9 with the aforesaid matter. Moreover, by letter dated
10 January 29th, 1999, Representative Henry Hyde affirmed that
11 Ms. Lewinsky's immunity agreement extended to her testimony
12 in the impeachment trial.
13 We assume that the questions to be posed to Ms.
14 Lewinsky today will not exceed the jurisdictional mandate of
15 the Independent Counsel, and we will object to questions
16 outside the scope of the mandate. We have been advised by
17 the House Managers and Senate counsel that no questions
18 pertaining to sexual matters will be asked.
19 On behalf of Ms. Lewinsky, we do object to the use
20 of videotape to record this deposition, and we object to any
21 dissemination of the videotape beyond the United States
22 Senate. With respect to testimony, prefatorily, Ms.
23 Lewinsky adopts the testimony she gave under oath on August
24 6th, August 20th, and August 26th, 1998.
25 Thank you.

13

1 SENATOR DeWINE: Thank you very much. The
2 objection will be--of course, be noted.
3 At this point, for the record, I would like to go
4 around the table and have everyone introduce themselves for
5 the record, and we'll start with the White House counsel and
6 if we could just do it maybe in order.
7 MS. SELIGMAN: Nicole Seligman on behalf of the
8 President.
9 MS. MILLS: Cheryl Mills on behalf of the
10 President.
11 SENATOR DeWINE: And again, for the--for Ms.
12 Lewinsky, if you all could introduce yourselves for the
13 record, please?
14 MR. STEIN: My name is Jake Stein.
15 MR. CACHERIS: Plato Cacheris.
16 MS. HOFFMANN: Sydney Hoffmann.
17 MR. BURTON: Preston Burton.
18 SENATOR DeWINE: And if the House Managers could
19 introduce themselves for the record?
20 MR. BRYANT: I'm Ed Bryant.
21 MR. SCHIPPERS: Tom Schippers.
22 MR. PINKOS: Steve Pinkos.
23 MR. ROGAN: Jim Rogan.
24 SENATOR DeWINE: The record should also reflect,
25 as Senator Leahy has indicated, that in the room are

1 Senators Christopher Dodd and Senator John Edwards. We
2 anticipate that later in the morning we will be joined by
3 Senators Arlen Specter, as well as Senator Fred Thompson.
4 The Senators have all been appointed Presiding
5 Officers by the Majority Leader and by the Democratic
6 Leader.
7 The videographers today are Thomas Olender and
8 Gregory Smith, employed by Video Age of Washington, D.C.
9 The court reporters today are Cathy Jardim and Christopher
10 Bitsko of Miller Reporting Service.
11 Now, if there are no further questions or
12 statements from the parties or from the counsel for the
13 witness, I will now swear--I'm sorry?
14 MS. SELIGMAN: I do have one objection that I'd
15 like to make before we begin.
16 I must object to the exhibits with which we were
17 served yesterday afternoon. Senate Resolution 30 required
18 the House Managers to provide, and I quote, "copies of all
19 exhibits in which the deposing party intends to enter into
20 the deposition." I'd like to mark for the record a copy of
21 what we did receive.
22 We were provided with a list of the 66 exhibits
23 yesterday afternoon, but were given copies of only 6 of
24 them. The list includes such general references as draft
25 letter to President Clinton, of which there are many in the

15

1 record, and testimony of Sidney Blumenthal, 6/4 in '98, two
2 pages, without a reference to which pages are intended.
3 What we received plainly is not in compliance with
4 the resolution. We therefore request that the Managers
5 immediately provide us and the witness with copies of the
6 exhibits they intend to use, as required by the resolution.
7 We also request that the Presiding Officers ask the Managers
8 to provide copies of the exhibits they intend to use in
9 future depositions, in compliance with the resolution.
10 SENATOR DeWINE: The resolution states as follows:
11 The party taking a deposition shall present to the other
12 party at least 18 hours in advance of the deposition copies
13 of all exhibits which the deposing party intends to enter
14 into the deposition.
15 Will the--would you like to respond?
16 MR. BRYANT: Yes, I'd be happy to. It was our
17 understanding that we had fully complied with that
18 provision, in that we sent along the record, the complete
19 record that contains the majority of the exhibits that we
20 intend to use.
21 The ones that are not in the record were attached,
22 physically attached, but I think we actually sent along
23 copies--sent along copies of the record, too. They already
24 had that in their possession.
25 SENATOR DeWINE: Okay, I'm not clear I understand.

16

1 MR. BRYANT: Well, the exhibits mentioned are in
2 the bound copy, the volumes of the communications that the
3 Independent Counsel provided us. They're in the record
4 already, and we've sent them--rather than copy individually
5 those 66 items or 60-something items that we didn't attach,
6 rather than copy these out of the books, we just sent the
7 books over, knowing that counsel could locate those
8 particular exhibits, as necessary.
9 SENATOR DeWINE: And those were referenced how?
10 MR. BRYANT: They're referenced on the exhibit
11 list.
12 SENATOR LEAHY: I wonder if I might ask, if you
13 were--
14 MR. BRYANT: Senator, we--I understand we've got
15 copies also we can now hand out.
16 SENATOR DeWINE: Okay. You're prepared to--
17 MR. BRYANT: Yes.
18 SENATOR DeWINE: --hand them copies, right?
19 MR. BRYANT: Yes.
20 SENATOR DeWINE: Hand them over.
21 SENATOR LEAHY: I think you should. I would think
22 that something saying a draft letter might be a little bit
23 broad even though there might be--it might be contained
24 somewhere in the record, but to be specific where it is, and
25 I would note that I would hope that all who are going to

17

1 be--on whatever side they're on, the White House side, the
2 House side--would be more specific than that. I--it would
3 also help if there were actual copies. That way, the
4 Presiding Officers would have them, too, and we'd know
5 specifically what it is.
6 SENATOR DeWINE: We have been provided with this
7 document, which I assume is the same document that you
8 provided.
9 MR. BRYANT: That's correct.
10 SENATOR DeWINE: Okay, and I--Pat, do you want to
11 mark this? Should we mark this one separately, if it's not
12 already been marked?
13 SENATOR LEAHY: Has this been marked?
14 MS. SELIGMAN: I just handed one to the court
15 reporter.
16 SENATOR LEAHY: Oh, you have, okay, to the court
17 reporter.
18 SENATOR DeWINE: So that document is the document
19 that you forwarded to the White House counsel.
20 MR. BRYANT: That's correct.
21 SENATOR DeWINE: So that will be marked as an
22 exhibit.
23 [White House Exhibit No. 1
24 marked for identification.]
25 SENATOR DeWINE: You have now turned over the

1 documents to White House counsel, is that right?
2 MR. SCHIPPERS: We're in the process.
3 SENATOR DeWINE: You are in the process of doing
4 that.
5 MR. SCHIPPERS: We're in the process.
6 SENATOR DeWINE: All right. Why don't we go off
7 the record for just a moment until that's completed?
8 THE VIDEOGRAPHER: We are going off the record at
9 9:21 a.m.
10 [Discussion off the record.]
11 THE VIDEOGRAPHER: We are going back on the record
12 at 9:24 a.m.
13 SENATOR DeWINE: We are now back on the record.
14 The House Managers have informed us that all the
15 exhibits that they have referenced and that they intend to
16 use are in the Senate record. They also, during this break,
17 have turned over copies of these exhibits that they
18 intend--or that they made a reference during this
19 deposition. They have turned those over to the White House
20 counsel.
21 SENATOR LEAHY: And I might note that it would be
22 very--are you picking this up?
23 THE VIEOGRAPHER: Yes.
24 SENATOR LEAHY: I might note that it would be very
25 helpful--and I think the Presiders will be this way, no

19

1 matter who is presiding--that if there are exhibits that
2 counsel--and whichever counsel are going to be using it, the
3 exhibits, White House counsel, the House Managers, whomever,
4 really work in getting them complete to the--to the other
5 side. Otherwise, we're going to be delayed like this
6 unnecessarily.
7 SENATOR DeWINE: Are there any other questions
8 from the parties or counsel at this time?
9 [No response.]
10 SENATOR DeWINE: If not, I will now swear the
11 witness.
12 Ms. Lewinsky, will you raise your right hand,
13 please?
14 Whereupon,
15 MONICA S. LEWINSKY
16 was called as a witness and, after having been first duly
17 sworn by Senator DeWine, was examined and testified as
18 follows:
19 SENATOR DeWINE: The House Managers may now begin
20 your questioning.
21 MR. BRYANT: Thank you, Senator.
22 Good morning to all present.
23 EXAMINATION BY HOUSE MANAGERS
24 BY MR. BRYANT:
25 Q Ms. Lewinsky, welcome back to Washington, and

1 wanted to just gather a few of our friends here to have this
2 deposition now. We do have quite a number of people
3 present, but we--in spite of the numbers, we do want you to
4 feel as comfortable as possible because I think we--everyone
5 present today has an interest in getting to the truth of
6 this matter, and so as best as you can, we would appreciate
7 your answers in a--in a truthful and a fashion that you can
8 recall. I know it's been a long time since some of these
9 events have occurred.
10 But for the record, would you state your name once
11 again, your full name?
12 A Yes. Monica Samille Lewinsky.
13 Q And you're a--are you a resident of California?
14 A I'm--I'm not sure exactly where I'm a resident
15 now, but I--that's where I'm living right now.
16 Q Okay. You--did you grow up there in California?
17 A Yes.
18 Q I'm not going to go into all that, but I thought
19 just a little bit of background here.
20 You went to college where?
21 A Lewis and Clark, in Portland, Oregon.
22 Q And you majored in--majored in?
23 A Psychology.
24 Q Tell me about your work history, briefly, from the
25 time you left college until, let's say, you started as an

21

1 intern at the White House.

2 A Uh, I wasn't working from the time I--

3 Q Okay. Did you--

4 A I graduated college in May of '95.

5 Q Did you work part time there in--in Oregon with

6 a--with a District Attorney--

7 A Uh--

8 Q --in his office somewhere?

9 A During--I had an internship or a practicum when I

10 was in school. I had two practicums, and one was at the

11 public defender's office and the other was at the Southeast

12 Mental Health Network.

13 Q And those were in Portland?

14 A Yes.

15 Q Okay. What--you received a bachelor of science in

16 psychology?

17 A Correct.

18 Q Okay. As a part of your duties at the Southeast

19 Health Network, what did you--what did you do in terms of

20 working? Did you have direct contact with people there,

21 patients?

22 A Yes, I did. Um, they referred to them as clients

23 there and I worked in what was called the Phoenix Club,

24 which was a socialization area for the clients to--really to

25 just hang out and, um, sort of work on their social skills.

1 So I--

2 Q Okay. After your work there, you obviously had

3 occasion to come to work at the White House. How did--how

4 did you come to decide you wanted to come to Washington, and

5 in particular work at the White House?

6 A There were a few different factors. My mom's side

7 of the family had moved to Washington during my senior year

8 of college and I wanted--I wasn't ready to go to graduate

9 school yet. So I wanted to get out of Portland, and a

10 friend of our family's had a grandson who had had an

11 internship at the White House and had thought it might be

12 something I'd enjoy doing.

13 Q Had you ever worked around--in politics and

14 campaigns or been very active?

15 A No.

16 Q You had to go through the normal application

17 process of submitting a written application, references, and

18 so forth to--to the White House?

19 A Yes.

20 Q Did you do that while you were still in Oregon, or

21 were you already in D.C.?

22 A No. The application process was while I was a

23 senior in college in Oregon.

24 Q Had you ever been to Washington before?

25 A Yes.

23

1 Q Obviously, you were accepted, and you started work
2 when?
3 A July 10th, 1995.
4 Q Where--where were you assigned?
5 A The Chief--
6 Q Physically, where were you located?
7 A Oh, physically?
8 Q Yes.
9 A Room 93 of the Old Executive Office Building.
10 Q Were you designated in any particular manner in
11 terms of--were all interns the same, I guess would be my
12 question?
13 A Yes and no. We were all interns, but there were a
14 select group of interns who had blue passes who worked in
15 the White House proper, and most of us worked in the Old
16 Executive Office Building with a pink intern pass.
17 Q Now, can you explain to me the significance of a
18 pink pass versus a blue pass?
19 A Sure.
20 Q Okay. Is it--is it access?
21 A Yes.
22 Q To what?
23 A A blue pass gives you access to anywhere in the
24 White House and a pink intern pass gives you access to the
25 Old Executive Office Building.

1 Q Did interns have blue passes?
2 A Yes, some.
3 Q Some did, and some had pink passes?
4 A Correct.
5 Q And you had the pink?
6 A Correct.
7 Q How long was your internship?
8 A It was from July 'til the end of August, and then
9 I stayed on for a little while until the 2nd.
10 Q Are most interns for the summertime--you do part
11 of the summer or the entire summer?
12 A I believe there are interns all year-round at the
13 White House.
14 Q Now, you as an intern, you are unpaid.
15 A Correct.
16 Q And tell--tell me how you came to, uh, through
17 your decisionmaking process, to seek a paid position and
18 stay in Washington.
19 A Uh, there were several factors. One is I came to
20 enjoy being at the White House, and I found it to be
21 interesting. I was studying to take the GREs, the entrance
22 exam for graduate school, and needed to get a job. So I--
23 since I had enjoyed my internship, my supervisor at the
24 time, Tracy Beckett, helped me try and secure a position.
25 Q Now, you mentioned the pink pass that you had. So

25

1 you were able to--I don't want to presume--you were able to
2 get into the White House on occasion even with a pink pass?
3 A The--do you mean the White House proper, or--
4 Q Yes, the White House--
5 A --the complex?
6 Q Yes. Let me be clear. When I--I tend to say
7 "White House"--I mean the actual building itself. And I
8 know perhaps you think of the whole complex in terms of the
9 whole--
10 A I'm sorry. Just to be clear--
11 Q Yes.
12 A --do you mean the West Wing and the residence and-
13 -
14 Q Right.
15 A --the East Wing when you say the White House?
16 Q Right. The White House where the President lives,
17 and works, I guess, right.
18 A I'm sorry. Can you repeat the question?
19 Q Yes, yes. I mean that White House. As an intern,
20 you had a pink pass that did allow you to have access to
21 that White House where the President was on occasion?
22 A No.
23 Q Did not. Did you have--did you ever get in there
24 as an intern?
25 A Yes.

1 Q And under--under what circumstances?
2 A It--
3 Q Did you have to be accompanied by someone, or--
4 A Exactly; someone with a blue pass.
5 Q So how did you--once you decided you wanted to
6 stay in Washington and find a paying job, you sought out
7 some help from friends there, people you knew, contacts, and
8 you were--you did--you were successful?
9 A Correct.
10 Q And you were hired where--where in the White
11 House?
12 A In Legislative Affairs.
13 Q Now, again, to educate me on this, in that group,
14 in that section, department, you would have worked where,
15 physically?
16 A Physically, in the East Wing.
17 Q Okay, and as an intern before, you worked in the
18 Old Executive Office Building?
19 A Correct.
20 Q But you moved about and occasionally would go into
21 the White House, if escorted?
22 A Correct.
23 Q It takes a while, but I'll get there with you;
24 I'll catch up.
25 When did you actually--what was your first day on

27

1 the job with the Legislative Affairs, uh, group?

2 A Um, first day on the job was sometime after the

3 furlough. I was hired right before the furlough, but the

4 paperwork hadn't gone through, so first day on the job was

5 some point after the furlough. I don't remember the exact

6 date.

7 Q So you remained, uh, on as an intern during the

8 furlough--

9 A Correct.

10 Q --the Government shutdown period.

11 A Correct.

12 Q And that was in November of 1995, some date during

13 that?

14 A Yes.

15 Q Okay. Um, tell me how you, um, began--I guess

16 the--the--we're going to talk about a relationship with the

17 President. Uh, when you first, uh, I guess, saw him, I

18 think there was some indication that you didn't speak to him

19 maybe the first few times you saw him, but you had some eye

20 contact or sort of smiles or--

21 A I--I believe I've testified to that in the grand

22 jury pretty extensively.

23 Q Uh-huh.

24 A Is--is there something more specific?

25 Q Well, again, I'm wanting to know times, you know,

1 how soon that occurred and sort of what happened, you know,
2 if you can--you know, there are going to be occasions where
3 you--obviously, you testified extensively in the grand jury,
4 so you're going to obviously repeat things today. We're
5 doing the deposition for the Senators to view, we believe,
6 so it's--
7 MR. CACHERIS: May I note an objection. The
8 Senators have the complete record, as you know, Mr. Bryant,
9 and she is standing on her testimony that she has given on
10 the occasions that Mr. Stein alluded to at the introduction
11 of this deposition.
12 MR. BRYANT: Well, I appreciate that, but, uh, if
13 this is going to be the case, we don't even need the
14 deposition, because we're limited to the record and
15 everything is in the record. So I think, uh, to be fair,
16 we're--we're obviously going to have to talk about, uh, some
17 things for 8 hours here, or else we can go home.
18 THE WITNESS: Sounds good to me.
19 [Laughter.]
20 MR. BRYANT: I think we probably all would like to
21 do that.
22 SENATOR DeWINE: Counsel, are you objecting to the
23 question?
24 MR. CACHERIS: Yes. I'm objecting to him asking
25 specific questions that are already in the record that--he

29

1 has said they are limited to the record, and so we accept
2 his, his designation. We're limited to the record.
3 SENATOR DeWINE: We're going to go off the record
4 for just a moment.
5 THE VIDEOGRAPHER: We're going off the record at
6 9:37 a.m.
7 [Recess.]
8 THE VIDEOGRAPHER: We are going back on the record
9 at 9:45 a.m.
10 SENATOR DeWINE: We are now back on the record.
11 The objection is noted, but it's overruled, and
12 the witness is instructed to answer the question.
13 Senator Leahy?
14 SENATOR LEAHY: And I had noted during the break
15 that obviously, the witness has 48 hours to correct her
16 deposition, and would also note that when somebody has
17 testified to some of these things 20 or more times that it
18 is not unusual to have some nuances different, and that
19 could also be reflected in time to correct her testimony.
20 And I had also noted when we were off the record
21 Mr. Manager Bryant's comment on January 26th, page S992 in
22 the Congressional Record, in which he said: "If our motion
23 is granted, I want to make this very, very clear. At no
24 point will we ask any questions of Monica Lewinsky about her
25 explicit sexual relationship with the President, either in

1 deposition or, if we are permitted on the floor of the
2 Senate, they will not be asked."
3 And I should add also, to be fair to Mr. Bryant,
4 another sentence in that: "That, of course, assumes that
5 White House Counsel does not enter into that discussion, and
6 we doubt that they would." Period, close quote.
7 SENATOR DeWINE: Let me just add something that I
8 stated to counsel and to Ms. Lewinsky off the record, and I
9 think I will briefly repeat it, and that is that counsel is
10 entitled to an answer to the question, but Ms. Lewinsky
11 certainly can reference previous testimony if she wishes to
12 do that. But counsel is entitled to a new explanation of--
13 of what occurred.
14 Counsel, you may--why don't you re-ask the
15 question, and we will proceed.
16 MR. BRYANT: May I, before I do that, ask a
17 procedural question in terms of timekeeping?
18 SENATOR DeWINE: The time is not counted--any of
19 the time that you have--once there is an objection, none of
20 the time is counted until we rule on the objection and until
21 you then have the opportunity to ask the question again. So
22 the time will start now.
23 MR. BRYANT: Very good.
24 BY MR. BRYANT:
25 Q Ms. Lewinsky, again, let me--I know this is

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1 difficult, but let me apologize that, uh, that it is going
2 to be necessary that I ask you these questions because we're
3 limited to the record and if we--we can't ask you any new
4 questions outside that record, so I have to talk about
5 what's in the record. And I realize you've answered all
6 these questions several times before, but it's, uh--I'm
7 sincere that we really wouldn't need to take your deposition
8 if we couldn't ask you those kinds of questions. So it's
9 not motivated to cause you uncomfort or to make you sit here
10 in Washington when you'd rather be in California. We'll try
11 to get through this as quickly as we can.
12 But we were talking about when you were first
13 assigned there at the White House and those initial
14 contacts, and I mean, again, when you were--you would see
15 the President. I think you've mentioned you would--there
16 was some mild flirting going on; you would smile or you
17 would make eye contact. It was something of this nature?
18 A Yes.
19 Q And the first--was the first time you actually
20 spoke to the President or he spoke to you, other than
21 perhaps a hello in the hallway, was that on November the
22 15th, 1995?
23 A Yes.
24 Q And that was--that was the day, uh, of the first
25 so-called salacious encounter, the same day?

1 A Yes.

2 Q Now, when the President gave a statement

3 testifying before the grand jury, he--he described that

4 relationship as what I considered sort of an evolving one.

5 He says: "I regret that what began as a friendship came to

6 include this conduct." And he goes on to take full

7 responsibility for his actions. But that almost sounds as

8 if this was an evolving--something from a friendship

9 evolving over time to a sexual relationship. That was not

10 the case, was it?

11 A I--I can't really comment on how he perceived it.

12 My perception was different.

13 Q Okay--

14 A But I--I--I mean, I don't feel comfortable saying

15 that he didn't, that he didn't see it that way, or that's

16 wrong; that's how he saw it. I--

17 Q But you saw it a different way?

18 A Yes.

19 Q Now, on November the 15th, had you already

20 accepted this job with Legislative Affairs?

21 A Yes.

22 Q And, uh, was--that was during the shutdown, so you

23 had no job to go to because the Government was shut down.

24 A No. I accepted it on the Friday before the

25 furlough.

33

1 Q And that--
2 A But the paperwork hadn't gone through.
3 Q Okay. Did, uh--when you first met with the
4 President on November the 15th, did he say anything to you
5 that would indicate that he knew you were an intern?
6 A No.
7 Q Did he make a comment about your, your pink
8 security badge?
9 A Can I ask my counsel a question real quickly,
10 please?
11 [Witness conferring with counsel.]
12 MR. CACHERIS: Okay, Mr Bryant.
13 THE WITNESS: Sorry. It was--that occurred in the
14 second encounter of that evening.
15 BY MR. BRYANT:
16 Q Okay. On November--
17 A So, not the first encounter.
18 Q On November the 15th, 1995?
19 A Correct.
20 Q What--do you recall what he said or what he did in
21 regard to the intern pass?
22 A He tugged on my pass and said: "This is going to
23 be a problem."
24 Q And what did, uh--did he say anything else about
25 what he meant by "problem"?

1 A No.
2 Q Tell me about your job at Legislative Affairs.
3 Did that involve going into the White House itself?
4 A Yes. My job was in the White House.
5 Q You were in one wing, but did that involve going--
6 did it give you access--
7 A Yes.
8 Q --pretty well throughout the White House?
9 A Yes.
10 Q What did you do primarily?
11 A I worked under Jocelyn Jolly, who supervised the
12 letters that came from the Hill; so the opening of those
13 letters and reading them and vetting them and preparing
14 responses for the President's signature--responding.
15 Q Now, you've indicated through counsel at the
16 beginning that you are willing to affirm, otherwise adopt,
17 your sworn testimony of August the 6th and August the 20th,
18 I think, which would be grand jury, and the deposition of
19 August the 26th, 1998.
20 A Correct.
21 Q So you're saying that that information is
22 accurate, and it is truthful?
23 A Yes.
24 Q Well, thank you. That--that will save us a little
25 bit of time, but certainly we will ask you some of that

35

1 information also.

2 At some point, you were transferred to the

3 Pentagon, to the Department of Defense. When did that

4 occur?

5 A I found out I was being transferred on April 5th,

6 1996.

7 Q Did you want to go--

8 A No.

9 Q --to the Department of Defense? Did you have a

10 discussion with the President about this?

11 A Yes.

12 Q What was your reaction to being transferred?

13 A I started to cry.

14 Q Did you talk to anyone else at the White House

15 other than the President about the transfer at that time?

16 A Yes.

17 Q And who--who was that?

18 A I spoke with several people. I--I can't--I know

19 I--I spoke with, uh, Jocelyn about it. I spoke with people

20 with whom I was friendly at the White House. I spoke to

21 Betty, Nancy Hernreich, several people.

22 Q Did you--did you find out why you were being

23 transferred?

24 A Uh, I was told why I was being transferred by Mr.

25 Keating on Friday, the 5th of April.

1 Q And that was why?

2 A Uh, he said that the--the Office of

3 Administration, I think it was, was not pleased with the way

4 the correspondence was being handled, and they were, quote-

5 unquote, "blowing up" the Correspondence Office, and that I

6 was being transferred and it had nothing to do with my work.

7 Q Did you have any understanding that it might have

8 been other reasons that you were being moved?

9 A Not at that point.

10 Q Did the--what did the President say about your

11 transfer at that point?

12 A He thought it had something to do with our

13 relationship.

14 Q What else did he say about--about your transfer,

15 if anything? Did he give you any assurances that you might

16 be back, or--

17 A Yes.

18 Q Back after what time period?

19 A He promised me he'd bring me back after the

20 election.

21 Q So this was, again, in early 19--April of 1996,

22 and he was up for reelection--

23 A Yes.

24 Q --in November of 1996.

25 A Yes.

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1 Q Did you attach any significance to being
2 transferred away before the election and then him assuring
3 you he would bring you back after the election? Did you
4 attach any significance to the election and your having to
5 leave?
6 A Emotional significance, yes.
7 Q Your emotion? I'm--I'm not sure I follow you.
8 You were--
9 A Well, yes, I attached significance to it.
10 Q And that was emotional--
11 A But that was emotional.
12 Q But the reason you both felt--again, I'm not
13 trying to put words in your mouth, but you both felt you
14 were leaving until after the election was because of your
15 relationship and perhaps people finding out?
16 A No. I--I--first, I can only speak for myself. I
17 mean, I, uh, my understanding initially was that it was, um,
18 for work-related issues, but not my work, and I came to
19 understand later that it was having to do with my
20 relationship with the President.
21 Q Okay. Did, uh, you have a conversation--and it
22 may be the same one with the President on April the 12th--
23 which determined that Ms. Lieberman maybe spearheaded your
24 transfer because you were paying too much attention--you
25 were all--you were both paying too much attention to each

1 other and she was worried that it was close to election
2 time? And I think you've testified to that, haven't you?
3 A Yes.
4 Q Okay, good. You started, uh, with the Department
5 of Defense at the Pentagon in mid-April, April the 17th,
6 1996?
7 A Yes.
8 Q What did you do there?
9 A I was the confidential assistant to Mr. Bacon, who
10 is the Assistant Secretary of Defense for Public Affairs.
11 Q Did, uh--after the 1996 election, did you still
12 want to go back to the White House?
13 A Yes.
14 Q You had not fallen in love with the job at the
15 Pentagon that much?
16 A No.
17 Q Was that, in fact, a frustrating period of time?
18 A Yes. No offense to Mr. Bacon, of course.
19 Q I understand; I'm sure he would take none.
20 I would like--I don't think it's been mentioned,
21 but you helped in preparing a chart which we have listed as
22 one of our exhibits, ML Number 2, which I assume might have
23 a different number for now, but it's a chart of contacts--
24 A Right.
25 Q --that you had with the President. And do you

39

1 have a copy of that chart? It--

2 [Witness conferring with counsel.]

3 MR. BRYANT: In the--yes, in the record, it's at

4 page 1251.

5 MR. BURTON: May we have an extra copy for

6 counsel, please?

7 BY MR. BRYANT:

8 Q Have you had occasion to review this document?

9 A Yes.

10 Q And very--very simply, I would like for you to,

11 uh, if you can, to affirm that document as an accurate

12 representation and a truthful representation of all the

13 contacts that you had with the President from approximately

14 August 9th, 1995 until January of 1998. It includes in-

15 person contacts, telephone calls, gifts and notes exchanged,

16 I think are the categories.

17 A Yes. I believe there might have been one or two

18 changes that were made and noted in the grand jury or my

19 deposition, and I adopt those as well.

20 MR. BRYANT: Okay, good.

21 I am not going to at this point make her--the

22 information she adopts and affirms exhibits to this

23 deposition. I don't want to clutter it any more unless

24 someone wants to make this an exhibit in terms of your

25 deposition testimony, your grand jury testimony, and now the

1 charts that you have affirmed, so I just want you to
2 specifically affirm it but not make it an exhibit, because
3 it's already a part of the record.
4 MR. CACHERIS: We defer to the White House.
5 MS. SELIGMAN: I just wanted to make clear on the
6 record, then, what the app. or sub-cite is of anything we're
7 adopting so that we all know what particular pages it is.
8 MR. BRYANT: Okay. And that, again, was, I think,
9 page 1251 of--right, of the record.
10 SENATOR LEAHY: I don't--I don't understand.
11 MS. MILLS: Can you cite the ending page?
12 SENATOR DeWINE: Counsel, is that where this
13 appears?
14 MR. BRYANT: It appears in the record, uh--
15 SENATOR DeWINE: You need to designate also if
16 you're talking about the Senate record or--I think at this
17 point we'll go off the record.
18 THE VIDEOGRAPHER: We're going off the record at
19 10:01 a.m.
20 [Recess.]
21 THE VIDEOGRAPHER: We are going back on the record
22 at 10:11 a.m.
23 SENATOR DeWINE: Let me--we're now back on the
24 record.
25 Let me advise counsel, the Managers, that they

1 have used 25 minutes so far.

2 You may resume questioning, and if you could begin

3 by identifying the exhibit for the record, please.

4 MR. BRYANT: Tom, let me also for clarification

5 purposes--Tom, on the referral to the Senate record, you're

6 saying that the appendices are numbered 3, but the numbers

7 are the same. The page numbers are the same.

8 MR. GRIFFITH: Yes.

9 MR. BRYANT: And the supplemental materials are

10 your Volume IV, but, again, the pages are the same.

11 MR. GRIFFITH: That's our understanding.

12 MR. BRYANT: Okay. For the record, then, using

13 the Senate volumes, if this is an appendices, Volume III,

14 and the chart that we just alluded to before the break

15 is--appears at pages 116 through 126 of the Senate record,

16 Volume III.

17 BY MR. BRYANT:

18 Q Ms. Lewinsky, did you tell a number of people in

19 varying details about your relationship with the President?

20 A Yes.

21 Q Can you tell us who did you tell?

22 A Catherine Allday Davis, Neysa Deman Erbland,

23 Natalie Ungvari, Ashley Raines, Linda Tripp, Dr. Kathy

24 Estep, Dr. Irene Kassorla, Andy Bleiler, my mom, my aunt.

25 Who else has been subpoenaed?

1 Q Okay. Let me suggest Dale--did you mention Dale
2 Young?
3 A Dale Young. I'm sorry.
4 Q Thank you.
5 Now, in the floor presentation, Mr. Craig, who was
6 one of--is one of the counsel for the President, adopted an
7 argument that had been raised in some of the previous
8 hearings, uh, and he adopted this argument in the Senate
9 that--that you have--have or had, I think, both past and
10 present, the incentive to not tell the truth about how the
11 President--this relationship with him because you wanted to
12 avoid--and again, I use the quote from Mr. Craig's
13 argument--the demeaning nature of providing wholly un-
14 reciprocated sex.
15 Did, uh--did you lie before the grand jury and to
16 your friends about the nature of that relationship with the
17 President--
18 A No.
19 Q --so as to avoid what Mr. Craig says? Okay, and
20 I'll break it down.
21 SENATOR DeWINE: Counsel, do you want to just--
22 just rephrase the question?
23 MR. BRYANT: Okay. We'll break it down into two
24 questions.
25 BY MR. BRYANT:

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1 Q Did you not tell the truth before the grand jury
2 as to how the President touched you because of what Mr.
3 Craig alleges as the demeaning nature of the wholly un-
4 reciprocated sex?
5 MR. CACHERIS: Well, that--may I register an
6 objection, gentlemen? This witness is not here to comment
7 on what some lawyer said on the floor of the Senate. He can
8 ask her direct questions. She will answer them, but what
9 Mr. Craig said or didn't say would have happened after her
10 grand jury testimony. So it's totally inappropriate that
11 he's--
12 SENATOR DeWINE: Mr. Bryant, why don't you--
13 MR. CACHERIS: --marrying those two concepts. We
14 object.
15 SENATOR DeWINE: Mr. Bryant, why don't you just
16 rephrase the question?
17 MR. BRYANT: Well, we--we have had presented on
18 behalf of the President a defense, an incentive, a reason
19 why she would not tell the truth, and I think she should
20 have the opportunity to respond to that--that allegation.
21 MR. CACHERIS: We--we don't, uh--
22 SENATOR LEAHY: Ask her a direct question.
23 MR. CAHCERIS: We welcome you asking her if her
24 testimony was truthful, and she will tell you that it is
25 truthful. We don't have any problem with that. We don't

1 have any brief with what the White House did or didn't do
2 through their counsel. That's their business. We don't
3 represent the White House.
4 MS. SELIGMAN: So, for the record, I'd like to
5 object to the characterization of what Mr. Craig says, which
6 obviously speaks for itself, j}|certainly want my
7 silence to be construed as accepting the Manager's
8 characterization of it.
9 SENATOR DeWINE: Mr. Bryant, why don't you--why
10 don't you ask the question?
11 MR. BRYANT: Okay.
12 SENATOR DeWINE: Go ahead and ask your question.
13 BY MR. BRYANT:
14 Q In regard to your testimony at the grand jury
15 about your--your relationship and the physical contact that
16 you have said occurred in some of these, uh, visits with the
17 President, it has been characterized in a way that would
18 give you an excuse not to tell the truth. Did you tell the
19 truth in the grand jury about what actually happened and how
20 the President touched--the President touched you?
21 A Yes.
22 Q And did you likewise tell the truth to your
23 friends in connection with the same matters?
24 A Yes.
25 Q Did your relationship with the President involve

45

1 giving gifts, exchanging gifts?

2 A Yes.

3 Q And you mentioned earlier that in reference to

4 this chart that it was, uh, subject to certain corrections

5 you've made in later testimony. It was an accurate

6 representation or an accurate compilation of the gifts that,

7 uh, you gave the President and the President gave you. Is

8 that correct?

9 A Yes.

10 Q Approximately how many gifts did you give the

11 President?

12 A I believe I've testified to that number. I don't

13 recall right now.

14 Q About 30? Would that be--

15 A If that's what I testified to, then I accept that.

16 Q That's the number I have, and do you recall how

17 many gifts approximately the President gave you?

18 A It would be the same situation.

19 Q Okay, and you've previously testified in your

20 grand jury that he gave you about 18 gifts.

21 A I accept that.

22 Q Okay, good. What types of gifts did you give the

23 President?

24 A They varied. I think they're listed on this

25 chart, and I've testified to them.

1 Q Okay, and--

2 MR. CACHERIS: Do you want her to read the list

3 that's on this chart?

4 MR. BRYANT: No. I was just, again, looking for

5 just a--I think maybe a little broader category, but

6 that's--that's okay. That's an acceptable answer there.

7 BY MR. BRYANT:

8 Q After leaving the White House and going to the

9 Pentagon, did you continue to visit the President?

10 A Yes.

11 Q How would you--how would you be transported from

12 the Pentagon over to the White House? How did you get

13 there?

14 A I drove or took a taxi.

15 Q Do you have your own car?

16 A No.

17 Q Whose--whose car would you drive?

18 A Either my mom's or my brother's.

19 Q So you did have access to a vehicle?

20 A Correct.

21 Q Okay. How were these meetings arranged when you

22 would want to go from the Pentagon to the White House? How

23 did--how did these--how were they set up? Did you get an

24 appointment?

25 [The witness conferring with counsel.]

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1 SENATOR DeWINE: Counsel--if you have to ask
2 counsel, you can stop and ask us--
3 THE WITNESS: Okay.
4 SENATOR DeWINE: --to do that.
5 BY MR. BRYANT:
6 Q How were these meetings arranged?
7 A Through Ms. Currie.
8 Q Would--would you call her and set the meeting up,
9 or would she call you on behalf of the President and set the
10 meeting up?
11 A It varied.
12 Q Both--both situations occurred?
13 A Correct.
14 Q Now, Ms. Currie is the President's--that's Betty
15 Currie, we're talking about, the President's secretary?
16 A Yes.
17 Q Why was this done? Why was that procedure used?
18 A It was my understanding that Ms. Currie took care
19 of the President's guests who were coming to see him, making
20 those arrangements.
21 Q Was, uh--was this--were these visits done sort of
22 off the record, so to speak, so it wouldn't necessarily be a
23 record?
24 A I believe so.
25 Q In other words, you wouldn't be shown on Betty

1 Currie's calendar or schedule book for the President?
2 A I don't know.
3 Q Did--who suggested this type of arrangement for
4 setting up meetings?
5 A I believe the President did.
6 Q During this time that you were at the Department
7 of Defense at the Pentagon, uh, how--how was it working out
8 about you being transferred back to the White House? How
9 was the job situation coming?
10 A Well, I waited until after the election and then
11 spoke with the President about it on several occasions.
12 Q And what would he say in response?
13 A Various things; "I'm working on it," usually.
14 Q In July, uh, particularly around the--the 3rd and
15 4th of July, there--there--you wrote the President a letter,
16 I think.
17 A Which year?
18 Q July of '90--it would have been '97 that you wrote
19 the President a letter expressing some frustrations about
20 the job situation in terms of--is that, uh--can you tell us
21 about that?
22 A Yes. I had had a--well, I guess I was--I know
23 I've testified about this, I mean, in the grand jury, but I
24 was feeling at that point that I was getting the runaround
25 on being brought back to the White House. So I sent a

1 letter to the President that was probably the harshest I had
2 sent.
3 Q Did you get a response?
4 A Sort of.
5 Q Would you explain?
6 A Um, Betty called me and told me to come to the
7 White House the next morning, on July 4th, at 9:00 a.m.
8 Q And what happened when you--I assume you went to
9 the White House on July the 4th. What happened?
10 A I know I--I--do you have a specific question? I
11 know I testified, I mean, extensively about this whole day,
12 that whole--
13 Q Well, in regards to--let's start with the job.
14 A Well, I started crying. We were in the back
15 office and, um--and when the subject matter came up, the
16 President was upset with me and then I began to cry. So--
17 Q Did he encourage you about you coming back? Did
18 he make a promise or commitment to you that he would make
19 sure you came back to work at the White House?
20 A I don't know that he reaffirmed his promise or
21 commitment. I remember leaving that day thinking that, as
22 usual, he was going to work on it and had a renewed sense of
23 hope.
24 Q Did he comment on your letter, the tone of your
25 letter?

1 A Yes.
2 Q What did he say?
3 A He was upset with me and told me it was illegal to
4 threaten the President of the United States.
5 Q Did you intend the letter to be interpreted that
6 way?
7 A No.
8 Q Did you explain why you wrote the letter to him
9 about reminding him that you were a good girl and you left
10 the White House? Did you have that type of conversation?
11 A Yes. That's what made me start to cry.
12 Q Did you, uh--did you ever explain to him that you
13 didn't intend to threaten him?
14 A I believe so.
15 Q What was the intent of the letter?
16 A First, I felt the letter was going to him as a man
17 and not as President of the United States. Um, second, I
18 think I could see how he could interpret it as a threat, but
19 my intention was to sort of remind him that I had been
20 waiting patiently and what I considered was being a good
21 girl, about having been transferred.
22 Q And the threat we're talking about here would not
23 have been interpreted as a threat to do physical injury or
24 bodily injury to him. It was to expose your relationship to
25 the--to your parents--

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1 A Correct.

2 Q --explain to them why you were not going back to

3 the White House--

4 A Correct.

5 Q --after the election?

6 And certainly the President did not encourage you

7 to expose that relationship, did he?

8 A I don't believe he made any comment about it at

9 that point.

10 Q His only comment about the so-called threat was

11 that it's a---it's--you can't do that, it's against the law

12 to threaten the President?

13 A Exactly.

14 Q That meeting turned into--I guess you've testified

15 that that meeting did turn into a more positive meeting

16 toward the end. It was not all emotional and accusations

17 being made?

18 A Correct.

19 Q At some point, uh--well, let me--let me back up

20 and ask this. There was a subsequent meeting on July the

21 14th, and I believe the President had been out of town and

22 this was the follow-up meeting to the July 4th meeting where

23 you had originally discussed the possibility of a newspaper

24 reporter or a magazine writer, I believe, writing a story

25 about Ms. Willey?

1 A Correct.

2 Q And you, uh--did you have any instructions from

3 the President, from either of these meetings, about doing

4 something for the President, specifically about having Ms.

5 Tripp call White House counsel--

6 A I don't know--

7 Q --Mr. Lindsey?

8 A --that I'd call them instructions.

9 Q Okay. What did he tell you? I don't want to

10 mischaracterize.

11 A He asked me if I would try to have Ms. Tripp

12 contact Mr. Lindsey.

13 Q Okay, and if you were to be successful in doing

14 that, what were you supposed to do? Were you supposed to

15 contact Ms. Currie, his secretary?

16 A Yes.

17 Q And what were you supposed to tell her?

18 A In an innocuous way that I had been able to convey

19 that to Ms. Tripp or get her to do that.

20 Q Now, in--at some point in October of that year,

21 1997, did your job focus change?

22 A Yes.

23 Q And how was that? What were you doing?

24 A Uh, it really changed on October 6th, 1997, as a

25 result of a conversation with Linda Tripp.

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1 Q Uh, in that, as I understand, you sort of got
2 secondhand information that you were probably never going
3 back to work at the White House.
4 A Correct.
5 Q Did you understand what that meant? Did you
6 accept that? And I guess why would you accept it at that
7 point? Why would you give up on the White House?
8 MR. CACHERIS: Those are three questions, Mr.
9 Bryant. Will you--would you break it down, please?
10 MR. BRYANT: Well, yeah, it's true.
11 BY MR. BRYANT:
12 Q Do you understand? I guess I'm trying to clarify.
13 A Not really. I'm sorry.
14 Q Why would you accept at that point in October that
15 you were never going back to the White House?
16 A I don't really remember, I mean, what--what--what
17 was going through my mind at that point as to--to answer
18 that question. Is that--
19 Q Okay.
20 A I'm sorry.
21 Q Certainly, if you don't remember, that's a--that's
22 a good answer.
23 A Okay.
24 Q So you don't recall anything had really changed
25 other than you had heard secondhand that you weren't going

1 to go back. You have no independent recollection of
2 anything else other than what somebody told you that would
3 have changed--
4 A My recollection is--
5 Q --changed your focus?
6 A --that it was this--it was this conversation, what
7 Linda Tripp told me from whom this information was coming,
8 the way it was relayed to me that--that shifted everything
9 that day.
10 Q And you didn't feel it was necessary to go back to
11 the President and perhaps confront the President and say,
12 "why am I not coming back, I want to come back?"
13 A I mean, I had a discussion with the President, but
14 I had made a decision from that based on that information,
15 and I guess my--my experience of it coming up on a year from
16 the election, having not been brought back, that it probably
17 wasn't going to happen.
18 Q But you--you did call the President about that
19 time and then--but the focus had been changed toward perhaps
20 a job in another location.
21 A Yes and no. I didn't call him, but I, um--
22 Q You called Betty--
23 A --but we did have a discussion about that.
24 Q You called Betty Currie, his secretary.
25 A Yes.

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1 Q Okay, and then through her, he contacted you and
2 you had a discussion?
3 A Yes.
4 Q And what did you tell him at that time about the
5 job?
6 A I believe I testified to that, so that my
7 testimony is probably more accurate. The gist of it was,
8 um, that I wanted to move to New York and that I was
9 accepting I wasn't going to be able to come back to the
10 White House, and I asked for his help.
11 Q Did you bring up Vernon Jordan's name as perhaps
12 somebody that could help you?
13 A It's possible it was in that conversation.
14 Q What was the President's comments back to you
15 about your deciding to go to New York?
16 A I don't remember his exact comments. He was
17 accepting of the concept.
18 Q In regards to your--your, uh, decision to search
19 for a job in New York, in your comments to the President,
20 did he ever tell you that that was good, that perhaps the
21 Jones lawyers could not easily find you in New York?
22 A I'm sorry. I don't--I--I--
23 MR. CACHERIS: Excuse me again, Mr. Bryant.
24 That's a compound question. He could--she could answer it
25 was good, and then she could answer maybe the Jones lawyer

1 couldn't get her, but I think you'd want an answer to each
2 question.
3 BY MR. BRYANT:
4 Q Okay. Let me ask it this way. There has been
5 some reference to that fact throughout the proceedings, and
6 I recall seeing something somewhere in your--your testimony
7 that you said it or he said it. Do you recall anything
8 being said about you going to Washington--to New York and
9 that the effect of that might be that you would be more
10 difficult to find?
11 A I believe that might have been mentioned briefly
12 on the 28th of December, but not as a reason to go to New
13 York, but as a possible outcome of being there. Does that--
14 does that make sense?
15 Q It does.
16 A Okay.
17 Q What, uh--what would have been the context of
18 that? And we're jumping ahead to December the 28th, but
19 what would have been the context of that particular
20 conversation about the New York and being perhaps--the
21 result being it might be difficult to find you, or more
22 difficult? What was the context?
23 A Um, I--I--if I remember correctly, it came sort of
24 at the tail-end of a very short discussion we had about the
25 Jones case.

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1 Q At this November the 11th meeting, did the
2 President ask you to prepare a list, sort of a wish list for
3 jobs?
4 A I'm sorry. Which--
5 Q I'm sorry. Did I say October? We're back to the
6 October the 11th meeting. Did the President ask you to
7 prepare a wish list?
8 A Okay. We haven't gone to the October 11th meeting
9 yet. I--I haven't said anything about that meeting yet.
10 Q Okay.
11 A The phone call was on the 9th.
12 Q Okay, and you subsequently had a meeting, then,
13 with the President on the 11th?
14 A Correct.
15 Q Face--face-to-face meeting?
16 A Correct.
17 Q And at that meeting, did he suggest you give him a
18 wish list or Betty Currie a wish list?
19 A Yes.
20 Q Again, I asked a compound question there.
21 Who did he suggest you give the wish list to?
22 MR. CACHERIS: We're getting used to that.
23 MR. BRYANT: I'm getting good. I'm making my own
24 objections now.
25 [Laughter.]

1 THE WITNESS: Um, we sustain those. No, I'm
2 sorry.
3 [Laughter.]
4 MR. BRYANT: I can do that, too. I'll be doing
5 that in a minute. Overruled. Okay.
6 THE WITNESS: Um, I--I believe he--he said I
7 should get him a list, and the implication was through
8 Betty.
9 BY MR. BRYANT:
10 Q And obviously you prepared a list of--
11 A Correct.
12 Q --the people you'd like to work for in New York
13 City.
14 A Correct.
15 Q And you sent that list--
16 A Yes.
17 Q --to Betty Currie or to the President?
18 A I sent it to Ms. Currie.
19 Q And also during this time--and I'm probably going
20 to speed this up a little bit, but, uh, you did interview
21 for the job at the United Nations?
22 A Yes.
23 Q And, uh--and through a process of several months
24 there, or weeks at least, you did--made an offer to take a
25 job at the United Nations and eventually declined it. Is

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1 that correct?

2 A Correct.

3 Q Did you in early November have the occasion to

4 meet with Vernon Jordan about the job situation?

5 A Yes.

6 Q And how did you learn about that meeting?

7 A I believe I asked Ms. Currie to check on the

8 status of--I guess of finding out if I could have this

9 meeting, and then she let me--she let me know to call Mr.

10 Jordan's secretary?

11 Q And you set up an appointment with Mr. Jordan, or

12 did she, Ms. Currie, do that?

13 A No. I set up an appointment. I think that was

14 after a phone--well, I guess I don't--I don't know that, so

15 sorry.

16 Q But that appointment was November the 5th?

17 A Yes.

18 Q Prior to going to the meeting with Vernon Jordan,

19 did you tell the President that you had a meeting with Mr.

20 Jordan?

21 A I don't think so. I don't remember.

22 Q Did you carry any documents or any papers with you

23 to the meeting with Mr. Jordan?

24 A Yes.

25 Q What were those?

1 A My resume and a list of public relations firms in
2 New York.
3 Q Did Mr. Jordan ask you why you were there?
4 A Yes.
5 Q And what did you say?
6 A I was hoping to move to New York and that he could
7 assist me in securing a job there.
8 Q Did he ask you why you wanted to leave Washington?
9 A Yes.
10 Q And what was your answer?
11 A I gave him the vanilla story of, um, that I--I
12 think I--I don't remember exactly what I said. I--I believe
13 I've testified to this. I think it was something about
14 wanting to get out of Washington.
15 Q The vanilla story. You mean sort of an innocuous
16 set of reasons, not really the true reasons you wanted to
17 leave?
18 A Yes.
19 Q And what were the true reasons you wanted to
20 leave?
21 A Because I couldn't go back to the White House.
22 Q Did--did you think Mr. Jordan accepted--did you
23 think he would accept that vanilla story, or did you feel
24 like he understood the real story?
25 A No, I felt he accepted it.

1 Q Did Mr. Jordan tell you during this meeting that
2 he had already spoken with the President?
3 A It was--I believe so.
4 Q And that you had come highly recommended, I think?
5 A Yes.
6 Q Did he, Mr. Jordan, review your list of job
7 preferences and suggest anything?
8 A Yes.
9 Q And what did he suggest?
10 A He said the names of the--he looked at the list of
11 public relations firms and I think sort of said, "oh, I've
12 heard of them, I haven't heard of these people, have you
13 heard of so and so," that I hadn't heard of.
14 Q Your meeting lasted about 20 minutes?
15 A If that's what I've testified to, then I accept
16 that.
17 Q It is, or close to it. I know this is an
18 approximation, but thereabouts. You weren't there all day.
19 A I had--well, I don't--I don't remember how long it
20 was right now. I know I've testified to that. So if I said
21 20 minutes, then--
22 Q Did you have a conversation with the President
23 on--about a week later on November the 12th and by
24 telephone?
25 A Yes.

1 Q And did you indicate there you had spoken with Mr.
2 Jordan about a job?
3 A Yes.
4 Q After you met with Mr. Jordan, did you--did you
5 have an impression that you would get, uh--get a job, get
6 favorable results in your job search?
7 A Yes.
8 Q Did anything favorable happen to--in your job
9 search from that November the 5th, 1997, meeting until
10 Thanksgiving?
11 A No, but I believe Mr. Jordan was out of town for a
12 week or two.
13 Q During the weeks after this November the 5th
14 interview, did you try to contact Mr. Jordan?
15 A Yes.
16 Q How?
17 A First, I sent him a thank-you note for the initial
18 meeting, and I believe I placed some phone calls right
19 before Thanksgiving--maybe a phone call. I don't remember
20 if it was more than one.
21 Q What--what happened with respect to the job
22 search, uh, through there, through Thanksgiving? Was there
23 anything? I mean, I know he--you said he was out of down,
24 but did anything, to your knowledge, occur? Could you see
25 any results up to Thanksgiving?

1 A From my meeting with Mr. Jordan?
2 Q Yes.
3 A No.
4 Q Did you contact Betty Currie after you received no
5 response from Mr. Jordan?
6 A Yes.
7 Q And did she page you? I think you were in Los
8 Angeles at the time.
9 A Correct.
10 Q Okay. What--what did she tell you as a result of
11 that telephone call?
12 A She asked me to place a call to Mr. Jordan, which
13 I did.
14 Q And this would have been, again, around November
15 the 26th, shortly--well, around Thanksgiving?
16 A It was before Thanksgiving.
17 Q And I assume you found Mr. Jordan.
18 A Yes.
19 Q And what did he tell you?
20 A That he was working on it.
21 Q Did he tell you to call him back?
22 A Yes.
23 Q Did you indeed call him back
24 A I didn't actually get ahold of him; he was out-of-
25 town that day. I think it was December 5th.

1 Q Did you try to meet with the President during this
2 time?
3 A Yes.
4 Q How did you do that?
5 A I was a pest. I sent a note to Ms. Currie and
6 asked her to pass it along to the President, requesting that
7 I meet with him.
8 Q Were you successful in having a meeting as a
9 result of those efforts?
10 A I don't know if it was a result of those efforts,
11 but yes, I ended up having a meeting with the President.
12 Q And when would that have been; what day?
13 A On the 6th of December 1997.
14 Q Again you are going through Betty Currie; is that,
15 again, the standard procedure at that time?
16 A Yes.
17 Q Did you go--I think you spoke also perhaps to
18 Betty Currie on December the 5th, the day before the
19 meeting--
20 A Yes.
21 Q --and this was something about attending the
22 President's speech. Was that when that occurred--or the
23 radio address, or something? Does that ring any bells?
24 A No.
25 Q Did--you did attend the Christmas party that day--

1 A Yes.
2 Q --and the White House. And you saw the President?
3 A Yes.
4 Q Just socially, speak to him, and that's it?
5 A Yes.
6 Q Picture, handshaking, and that?
7 A [Nodding head.]
8 Q Okay. That's a yes?
9 A Yes. Sorry.
10 Q Prior to December 6th, 1997, had you purchased a
11 Christmas gift for the President?
12 A Yes.
13 Q Which was?
14 A An antique standing cigar holder.
15 Q And had you purchased any other additional gifts
16 for him?
17 A Yes.
18 Q And what were those?
19 A Uh, a Starbucks mug that said "Santa Monica"; a
20 necktie that I got in London; a little box--I call it a
21 "chochki"--from, uh--and an antique book on Theodore
22 Roosevelt.
23 Q Was it your intention to, to carry those Christmas
24 presents to the President home that Saturday, December the
25 6th?

1 A If I were to have a meeting with him, yes.

2 Q Did you attempt to have a meeting?

3 A Yes.

4 Q Did you go through Betty Currie?

5 A Yes. I sent her the letter to, to give to the

6 President.

7 Q And when you went to the White House that day, you

8 also attempted to, to have the meeting through calling Betty

9 Currie and telephoning her; I believe you had to go to--

10 A Which day? I'm sorry.

11 Q On the 6th.

12 A No.

13 Q The Saturday.

14 A [No response.]

15 Q No?

16 A I--I attempted to give the presents to Betty, but

17 I didn't call and attempt to have a meeting there--well, I

18 guess I called in the morning, so that's not true--I'm

19 sorry. Yes, I called Ms. Currie in the morning trying to

20 see if I could see the President and apologize.

21 Q And--were you--did you see the President, then, on

22 the 6th?

23 A Yes, I did.

24 Q Tell us about that meeting--that was a long--was

25 that, uh--did you have a telephone conversation with him

1 that day also?

2 A Yes.

3 Q And that was the long telephone conversation?

4 A It--it was.

5 Q Okay. I think there has been some indication it

6 may have been 56 minutes, something approximating an hour-

7 long conversation; does that sound right?

8 A Right. That would--that might include some

9 conversation time with Ms. Currie as well.

10 Q Okay. Was he interrupted by Ms. Currie--could you

11 tell--did he have to take a break from the telephone call to

12 talk to Ms. Currie, or do you recall any, any--

13 A I don't recall that.

14 Q --do you recall any breaks to talk to anybody

15 else?

16 A I don't recall that. Doesn't mean it didn't

17 happen; I just don't remember it.

18 Q What else did you--did you arrange in that

19 telephone conversation, or did he invite you in that

20 telephone conversation to come to the White House that day?

21 A Yes, he did.

22 Q What happened during, during that conversation in

23 terms of--I understand that it was again an emotional day,

24 some sort of a word fight; is that right?

25 A Yes.

1 Q Could you tell me--he was, uh--again, to perhaps
2 save some time--he was angry about an earlier incident, and,
3 uh, he felt like you were intruding on his lawyer time?
4 A Uh, he was upset that I hasn't accepted that he
5 just couldn't see me that day.
6 Q And what was your response to that?
7 A Probably not positive. Uh, that's why it was a
8 fight.
9 Q Again, I want to be careful that I don't put words
10 in your mouth, but you were dealing with this relationship
11 from an emotional standpoint of wanting to spend time with
12 him--
13 A Yes.
14 Q --not as President, but as a man?
15 A Correct.
16 Q And this was at a point when you didn't feel like
17 you were spending enough time with him?
18 A Correct.
19 Q And he obviously felt he had to do other things,
20 too, talk to lawyers and do those kinds of things--be the
21 President--is that right?
22 A Yes.
23 Q Okay. Now, was some of this discussion that we
24 term "the fight," was that over the telephone?
25 A Yes. It was all over the telephone.

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1 Q So by the time you arrived and had the face-to-
2 face meeting with him, that was over?
3 A Correct.
4 Q Was that during the time that you exchanged--
5 exchanged some of the Christmas presents with him?
6 A In--in the meeting?
7 Q Yes.
8 A Yes. I gave him my Christmas presents.
9 Q Did you discuss the job search with him also at
10 that time?
11 A I believe I mentioned it.
12 Q Did you tell him that, uh, your job search with
13 Mr. Jordan was not going well?
14 A I don't know if I used those words. I don't, I
15 don't remember exactly--
16 Q If your grand jury testimony said yes--I mean,
17 words to that effect--that would--you could have used those
18 words if they're in your grand jury--
19 A If my grand jury testimony says that--if that's
20 what I said in my grand jury testimony, then I accept that.
21 Q I'm not trying to--I'm not trying to trick you.
22 A Okay.
23 Q Did he make any comment to you about what he might
24 do to aid in your job search at that time, if you recall?
25 A I think he--I think he said, oh, let me see about

1 it, let me see what I can do--his usual.

2 Q Did, uh, did the President say anything to you at

3 that time about your name appearing on a witness list in the

4 Paula Jones case?

5 A No.

6 Q Did you later learn that your name had appeared on

7 such a list?

8 A Yes.

9 Q And did you later learn that that witness list had

10 been faxed to the White House--to the President's lawyers on

11 December the 5th?

12 A Much later, as in last year.

13 Q Okay. Yes--that's what I mean--later.

14 A I, I mean--

15 Q Yes.

16 A --post this investigation.

17 Q Okay. All right. Let's go forward another week

18 or so to December the 11th and a lunch that you had with

19 Vernon Jordan, I believe, in his office.

20 A Yes.

21 Q How did--how was that meeting set up.

22 A Through his secretary.

23 Q Did you instigate that, or did he call through his

24 secretary?

25 A I don't remember.

1 Q What was the purpose of that meeting?
2 A Uh, it was to discuss my job situation.
3 Q And what, what--how was that discussed?
4 A Uh, Mr. Jordan gave me a list of three names and
5 suggested that I contact these people in a letter that I
6 should cc him on, and that's what I did.
7 Q Did he ask you to copy him on the letters that you
8 sent out?
9 A Yes.
10 Q During this meeting, did he make any comments
11 about your status as a friend of the President?
12 A Yes.
13 Q What--what did he say?
14 A In one of his remarks, he said something about me
15 being a friend of the President.
16 Q And did you respond?
17 A Yes.
18 Q How?
19 A I said that I didn't, uh--I think I--my grand jury
20 testimony, I know I talked about this, so it's probably more
21 accurate. My memory right now is I said something about,
22 uh, seeing him more as, uh, a man than as a President, and I
23 treated him accordingly.
24 Q Did you express your frustration to Mr. Jordan
25 with, uh, with the President?

1 A I expressed that sometimes I had frustrations with
2 him, yes.
3 Q And what was his response to you about, uh--after
4 you talked about the President?
5 A Uh, he sort of jokingly said to me, You know what
6 your problem is, and don't deny it--you're in love with him.
7 But it was a sort of light-hearted nature.
8 Q Did you--did you have a response to that?
9 A I probably blushed or giggled or something.
10 Q Do you still have feelings for the President?
11 A I have mixed feelings.
12 Q What, uh--maybe you could tell us a little bit
13 more about what those mixed feelings are.
14 A I think what you need to know is that my grand
15 jury testimony is truthful irrespective of whatever those
16 mixed feelings are in my testimony today.
17 Q I know in your grand jury you mentioned some of
18 your feelings that you felt after he spoke publicly about
19 the relationship, but let me ask you more about the
20 positive--you said there were mixed feelings. What about--
21 do you still, uh, respect the President, still admire the
22 President?
23 A Yes.
24 Q Do you still appreciate what he is doing for this
25 country as the President?

1 A Yes.

2 Q Sometime back in December of 1997, in the morning

3 of December the 17th, did you receive a call from the

4 President?

5 A Yes.

6 Q What was the purpose of that call? What did you

7 talk about?

8 A It was threefold--first, to tell me that Ms.

9 Currie's brother had been killed in a car accident; second,

10 to tell me that my name was on a witness list for the Paula

11 Jones case; and thirdly, he mentioned the Christmas present

12 he had for me.

13 Q This telephone call was somewhere in the early

14 morning hours of 2 o'clock to 2:30.

15 A Correct.

16 Q Did it surprise you that he called you so late?

17 A No.

18 Q Was this your first notice of your name being on

19 the Paula Jones witness list?

20 A Yes.

21 Q I realize he, he commented about some other

22 things, but I do want to focus on the witness list.

23 A Okay.

24 Q Did he say anything to you about how he felt

25 concerning this witness list?

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1 A He said it broke his heart that, well, that my
2 name was on the witness list.
3 Can I take a break, please? I'm sorry.
4 SENATOR DeWINE: Sure, sure. We'll take a 5-
5 minute break at this point.
6 THE VIDEOGRAPHER: This marks the end of Videotape
7 Number 1 in the deposition of Monica S. Lewinsky. We are
8 going off the record at 10:56 a.m.
9 [Recess.]
10 THE VIDEOGRAPHER: This marks the beginning of
11 Videotape Number 2 in the deposition of Monica S. Lewinsky.
12 The time is 11:10 a.m.
13 SENATOR DeWINE: We are now back on the record.
14 I will advise the House Managers that they have
15 used one hour and 8 minutes.
16 Mr. Bryant, you may proceed.
17 MR. BRYANT: Thank you.
18 BY MR. BRYANT:
19 Q Did--did we get your response? We were talking
20 about the discussion you were having with the President over
21 the telephone, early morning of the December 17th phone
22 call, and he had, uh, mentioned that it broke his heart that
23 you were on that list.
24 A Correct.
25 Q And I think you were about to comment on that

1 further, and then you need a break.

2 A No.

3 Q No.

4 A I just wanted to be able to focus--I know this is

5 an important date, so I felt I need a few moments to be able

6 to focus on it.

7 Q And you're comfortable now with that, with your--

8 you are ready to talk about that?

9 A Comfortable, I don't know, but I'm ready to talk

10 about.

11 Q Well, I mean comfortable that you can focus on it.

12 A Yes, sir.

13 Q Good. Now, with this discussion of the fact that

14 your name appeared as a witness, had you--had you been

15 asleep that night when the phone rang?

16 A Yes.

17 Q So were you wide awake by this point? It's the

18 President calling you, so I guess you're--you wake up.

19 A I wouldn't say wide awake.

20 Q He expressed to you that your name--you know,

21 again, you talked about some other things--but he told you

22 your name was on the list.

23 A Correct.

24 Q What was your reaction to that?

25 A I was scared.

1 Q What other discussion did you have in regard to
2 the fact that your name was on the list? You were scared;
3 he was disappointed, or it broke his heart. What other
4 discussion did you have?
5 A Uh, I believe he said that, uh--and these are not
6 necessarily direct quotes, but to the best of my memory,
7 that he said something about that, uh, just because my name
8 was on the list didn't necessarily mean I'd be subpoenaed;
9 and at some point, I asked him what I should do if I
10 received a subpoena. He said I should, uh, I should let Ms.
11 Currie know. Uh--
12 Q Did he say anything about an affidavit?
13 A Yes.
14 Q What did he say?
15 A He said that, uh, that I could possibly file an
16 affidavit if I--if I were subpoenaed, that I could possibly
17 file an affidavit maybe to avoid being deposed.
18 Q How did he tell you you would avoid being deposed
19 by filing an affidavit?
20 A I don't think he did.
21 Q You just accepted that statement?
22 A [Nodding head.]
23 Q Yes?
24 A Yes, yes. Sorry.
25 Q Are you, uh--strike that. Did he make any

1 representation to you about what you could say in that
2 affidavit or--
3 A No.
4 Q What did you understand you would be saying in
5 that affidavit to avoid testifying?
6 A Uh, I believe I've testified to this in the grand
7 jury. To the best of my recollection, it was, uh--to my
8 mind came--it was a range of things. I mean, it could
9 either be, uh, something innocuous or could go as far as
10 having to deny the relationship. Not being a lawyer nor
11 having gone to law school, I thought it could be anything.
12 Q Did he at that point suggest one version or the
13 other version?
14 A No. I didn't even mention that, so there, there
15 wasn't a further discussion--there was no discussion of what
16 would be in an affidavit.
17 Q When you say, uh, it would be--it could have been
18 something where the relationship was denied, what was your
19 thinking at that point?
20 A I--I--I think I don't understand what you're
21 asking me. I'm sorry.
22 Q Well, based on prior relations with the President,
23 the concocted stories and those things like that, did this
24 come to mind? Was there some discussion about that, or did
25 it come to your mind about these stories--the cover stories?

1 A Not in connection with the--not in connection with
2 the affidavit.
3 Q How would--was there any discussion of how you
4 would accomplish preparing or filing an affidavit at that
5 point?
6 A No.
7 Q Why--why didn't you want to testify? Why would
8 not you--why would you have wanted to avoid testifying?
9 A First of all, I thought it was nobody's business.
10 Second of all, I didn't want to have anything to do with
11 Paula Jones or her case. And--I guess those two reasons.
12 Q You--you have already mentioned that you were not
13 a lawyer and you had not been to law school, those kinds of
14 things. Did, uh, did you understand when you--the potential
15 legal problems that you could have caused yourself by
16 allowing a false affidavit to be filed with the court, in a
17 court proceeding?
18 A During what time--I mean--I--can you be--I'm
19 sorry--
20 Q At this point, I may ask it again at later points,
21 but the night of the telephone--
22 A Are you--are you still referring to December 17th?
23 Q The night of the phone call, he's suggesting you
24 could file an affidavit. Did you appreciate the
25 implications of filing a false affidavit with the court?

1 A I don't think I necessarily thought at that point
2 it would have to be false, so, no, probably not. I don't--I
3 don't remember having any thoughts like that, so I imagine I
4 would remember something like that, and I don't, but--
5 Q Did you know what an affidavit was?
6 A Sort of.
7 Q Of course, you're talking at that time by
8 telephone to the President, and he's--and he is a lawyer,
9 and he taught law school--I don't know--did you know that?
10 Did you know he was a lawyer?
11 A I--I think I knew it, but it wasn't something that
12 was present in my, in my thoughts, as in he's a lawyer, he's
13 telling me, you know, something.
14 Q Did the, did the President ever tell you, caution
15 you, that you had to tell the truth in an affidavit?
16 A Not that I recall.
17 Q It would have been against his interest in that
18 lawsuit for you to have told the truth, would it not?
19 A I'm not really comfortable--I mean, I can tell you
20 what would have been in my best interest, but I--
21 Q But you didn't file the affidavit for your best
22 interest, did you?
23 A Uh, actually, I did.
24 Q To avoid testifying.
25 A Yes.

1 Q But had you testified truthfully, you would have
2 had no--certainly, no legal implications--it may have been
3 embarrassing, but you would have not had any legal problems,
4 would you?
5 A That's true.
6 Q Did you discuss anything else that night in terms
7 of--I would draw your attention to the cover stories. I
8 have alluded to that earlier, but, uh, did you talk about
9 cover story that night?
10 A Yes, sir.
11 Q And what was said?
12 A Uh, I believe that, uh, the President said
13 something--you can always say you were coming to see Betty
14 or bringing me papers.
15 Q I think you've testified that you're sure he said
16 that that night. You are sure he said that that night?
17 A Yes.
18 Q Now, was that in connection with the affidavit?
19 A I don't believe so, no.
20 Q Why would he have told you you could always say
21 that?
22 A I don't know.
23 MR. BURTON: Objection. You're asking her to
24 speculate on someone else's testimony.
25 MR. BRYANT: Let me make a point here. I've been

1 very patient in trying to get along, but as I alluded to
2 earlier, and I said I am not going to hold a hard line to
3 this, but I don't think the President's--the witness'
4 lawyers ought to be objecting to this testimony. If there's
5 an objection here, it should come from the White House side,
6 nor should they be--
7 SENATOR DeWINE: Counsel, why don't you rephrase
8 the question?
9 MR. BRYANT: Do we have a clear ruling on whether
10 they can object?
11 SENATOR DeWINE: We'll go off the record for a
12 moment.
13 THE VIDEOGRAPHER: We're going off the record at
14 11:20 a.m.
15 [Recess.]
16 THE VIDEOGRAPHER: We are going back on the record
17 at 11:30 a.m.
18 SENATOR DeWINE: We are now back on the record.
19 It's our opinion that counsel for Ms. Lewinsky do
20 have the right to make objections. We would ask them to be
21 as short and concise as humanly possible. So we will now
22 proceed.
23 Mr. Bryant?
24 MR. BRYANT: Thank you, Senator.
25 BY MR. BRYANT:

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1 Q Let's kind of bring this back together again, and
2 I'll try to ask sharper questions and avoid these
3 objections.
4 We're at that point that we've got a telephone
5 conversation in the morning with you and the President, and
6 he has among other things mentioned to you that your name is
7 on the Jones witness list. He has also mentioned to you
8 that perhaps you could file an affidavit to avoid possible
9 testifying in that case. Is that right?
10 A Correct.
11 Q And he has also, I think, now at the point that we
12 were in our questioning, referenced the cover story that you
13 and he had had, that perhaps you could say that you were
14 coming to my office to deliver papers or to see Betty
15 Currie; is that right?
16 A Correct. It was from the entire relationship,
17 that story.
18 Q Now, when he alluded to that cover story, was that
19 instantly familiar to you?
20 A Yes.
21 Q You knew what he was talking about?
22 A Yes.
23 Q And why was this familiar to you?
24 A Because it was part of the pattern of the
25 relationship.

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1 Q Had you actually had to use elements of this cover
2 story in the past?
3 A I think so, yes.
4 Q Did the President ever tell you what to say if
5 anyone asked you about telephone conversations that you had
6 had with him?
7 A Are we--are we still focused on December 17th?
8 Q No, no.
9 A Okay.
10 Q It did not have to be that night. Did he ever?
11 A If I could just--I--I'm pretty date-oriented, so
12 if you could just be more specific with the date. If we're
13 staying on a date or leaving that date, it would just help
14 me. I'm sorry.
15 Q Well, my question was phrased did he ever do that,
16 but--
17 A Okay.
18 Q Well, I--I'm sorry. I'm playing guessing games
19 with you. Was there a conversation on March 29th of 1997
20 when the President told you he thought perhaps his telephone
21 conversations were being tapped or taped--either way, or
22 both--by a foreign embassy?
23 A Yes.
24 Q And was there some reference to some sort of cover
25 story there in the event that his line was tapped?

1 A Yes.
2 Q And what was that?
3 A That--I think, if I remember it correctly, it was
4 that we--that he knew that we were sort of engaging in those
5 types of conversations, uh, knowing that someone was
6 listening, so that it was not for the purposes that it might
7 have seemed.
8 Q Did you find it a little strange that he would
9 express concern about possible eavesdropping and still
10 persist in these calls to you?
11 A I don't think phone calls of that nature occurred
12 and happened right after, or soon after that discussion. I
13 think it was quite a few months until that resumed.
14 Q I think my question was more did you not find it a
15 little strange that he felt that perhaps his phone was being
16 tapped and conversations taped by a foreign embassy, and
17 he--
18 A I--I thought it was strange, but if--I mean, I
19 wasn't going to question what he was saying to me.
20 Q But that he also continued to make the calls--
21 you're saying he didn't make any calls after that?
22 A No. My understanding was it was referencing a
23 certain type of phone call, certain nature of phone call,
24 uh, and those--
25 Q Let me direct your attention back to a point I did

1 not mention a couple--a few days before the December--early
2 December telephone call, the lengthy telephone call from the
3 President. We had talked about how that was a heated
4 conversation.
5 A Correct.
6 Q At--did at some point during that telephone
7 conversation--did the tone--did the President's tone change
8 to a more receptive, friendly conversation?
9 A Yes.
10 Q Do you know why that happened?
11 A No, nor do I remember whose tone changed first. I
12 mean, we made up, so--
13 Q Okay. Now let me go back again to the December
14 11th date--I'm sorry--the 17th. This is the conversation in
15 the morning. What else--was there anything else you talked
16 about in terms of--other than your name being on the list
17 and the affidavit and the cover story?
18 A Yes. I had--I had had my own thoughts on why and
19 how he should settle the case, and I expressed those
20 thoughts to him. And at some point, he mentioned that he
21 still had this Christmas present for me and that maybe he
22 would ask Mrs. Currie to come in that weekend, and I said
23 not to because she was obviously going to be in mourning
24 because of her brother.
25 Q In--in that--in that relationship with the

1 President, I think you have expressed in your testimony
2 somewhere that you weren't necessarily jealous of those
3 types of people like Kathleen Willey or Paula Jones, and
4 perhaps you didn't even believe those stories occurred
5 as--as they alleged.
6 A That's correct. I don't--I don't know, jealous or
7 not jealous. I don't think I've testified to my feelings of
8 jealousy, but the latter half of the question is true.
9 Q I--I saw it. I mean, it's not a major point. I
10 thought I saw that in your testimony, that particular word.
11 A Okay. If I said that, then I--I don't.
12 Q Was it your belief that the Paula Jones case was
13 not a valid lawsuit? Was that part of that discussion that
14 night, or your strategy?
15 A Uh, can I separate that--that into two questions?
16 Q Any way, any way you want to.
17 A Okay. I don't believe it was a valid lawsuit, and
18 I don't think whether I believed it was a valid lawsuit or
19 not was the topic of the conversation.
20 Q Okay, that's a fair answer.
21 You believe the President's version of the Paula
22 Jones incident?
23 A Is that relevant to--
24 Q I--I just asked you the question.
25 A I don't believe Paula Jones' version of the story.

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1 Q Okay, good. That's a fair answer.

2 You have testified previously that you tried to

3 maintain secrecy regarding this relationship--and we're

4 talking about obviously with the President. Is that true?

5 A Yes.

6 Q And to preserve the secrecy and I guess advance

7 this cover story, you would bring papers to the President

8 and always use Betty Currie for the excuse for you to be

9 WAVE'd in. Is that right?

10 A Papers when I was working at the White House and

11 Mrs. Currie after I left the White House. So Mrs. Currie

12 wasn't involved when I was working at the White House.

13 Q Were these papers you carried in to the

14 President--were they--were they business documents, or were

15 they more personal papers from you to him?

16 A They--they weren't business documents.

17 Q So, officially, you were not carrying in official

18 papers?

19 A Correct.

20 Q You were carrying in personal papers that would

21 not have entitled you ordinarily to go see the President?

22 A Correct.

23 Q When--in this procedure where Betty Currie was

24 always the one that WAVE'd you in to the White House--and

25 I--I don't know if the people who may be watching this

1 deposition, the Senators, understand that the WAVES process
2 is just the--to give the guards the okay for you to come in.
3 Is that a short synopsis?
4 A I'm not really versed on--
5 Q I'm not either. You know more than I do,
6 probably, since you worked there, but--
7 A Well, I know you had to go, you had to type in a
8 thing in at WAVES, and now you have to give a Social
9 Security, birth date, have to show ID.
10 Q Is there a record kept of that?
11 A I believe so.
12 Q Was it always Betty Currie that WAVE'd you in to
13 the--access to the White House? I'm talking about now after
14 you left and went to work at the Pentagon.
15 A No.
16 Q Other people did that?
17 A There were other reasons that I came to the White
18 House at times.
19 Q Did you ever ask the President if he would WAVE
20 you in?
21 A Yes.
22 Q Did he ever do that?
23 A No, not to my--not to my knowledge.
24 Q Was there a reason? Did he express anything to
25 you why he would or would not?

1 A Yes. He said that, uh--I believe he said
2 something about that there's a specific list made of people
3 that he requests to come in and--and there are people who
4 have access to that list.
5 Q So, obviously, he didn't want your name being on
6 that list?
7 A Correct.
8 Q Now, some of those people--
9 A I think--well, that's my understanding.
10 Q Would some of those people be the people that
11 worked outside his office, Ms. Lieberman and those--those
12 folks?
13 A I--I believe so, but I'm not really sure.
14 Q Did you not want those people to know that you
15 were inside the White House?
16 A I didn't.
17 Q Why is that?
18 A Because they didn't like me.
19 Q Would they have objected, do you think--if you
20 know.
21 A I don't know.
22 Q Did you work with Betty Currie on occasions to--to
23 get in to see the President, perhaps bypass some of these
24 people?
25 A Yes.

1 Q And that would be another way that you would
2 conceal the meeting with the President, by using Betty
3 Currie to get you in?
4 A I--I think, yes, be cautious of it.
5 Q Did--well, I think we've covered that, about some
6 papers, and I think we've covered that after you left your
7 job inside the White House with Legislative Affairs and went
8 to the Pentagon, you developed a story, a cover story to the
9 effect that you were going to see Betty, that's how you
10 would come in officially?
11 A Correct.
12 Q And during that time that you were at the
13 Pentagon, you would more likely visit him on weekends or
14 during the week? Which would--which would--
15 A Weekends.
16 Q Weekends. And why--why the weekends?
17 A First, I think he had less work, and second of
18 all, there were--I believe there were less people around.
19 Q Now, whose idea was it for you to come on
20 weekends?
21 A I believe it was the President's.
22 Q When you--when the President was in his office,
23 was your purpose to go there and see him? If he was in the
24 office, you would go see him?
25 A What--I'm sorry.

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1 Q No--that's not clear. I'll withdraw that
2 question.
3 Was Ms. Currie, the President's secretary--was she
4 in the loop, so to speak, in keeping this relationship and
5 how you got in and out of the White House, keeping that
6 quiet?
7 A I think I actually remember reading part of my
8 grand jury testimony about this and that it was more
9 specific in that she was in the loop about my friendship
10 with the President, but I just want to not
11 necessarily--there was a clarification, I believe, in that
12 about knowledge of the complete relationship or not. So--
13 Q She would help with the gifts and notes and things
14 like that--the passing?
15 A Yes.
16 Q Would you agree that these cover stories that
17 you've just testified to, if they were told to the attorneys
18 for Paula Jones, that they would be misleading to them and
19 not be the whole story, the whole truth?
20 A They would--yes, I guess misleading. They were
21 literally true, but they would be misleading, so incomplete.
22 Q As I understand your testimony, too, the cover
23 stories were reiterated to you by the President that night
24 on the telephone--
25 A Correct.

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1 Q --and after he told you you would be a witness--or
2 your name was on the witness list, I should say?
3 A Correct.
4 Q And did you understand that since your name was on
5 the witness list that there would be a possibility that you
6 could be subpoenaed to testify in the Paula Jones case?
7 A I think I understood that I could be subpoenaed,
8 and there was a possibility of testifying. I don't know if
9 I necessarily thought it was a subpoena to testify, but--
10 Q Were you in fact subpoenaed to testify?
11 A Yes.
12 Q And that was what--
13 A December 19th, 1997.
14 Q December 19th.
15 Now, you have testified in the grand jury. I
16 think your closing comments was that no one ever asked you
17 to lie, but yet in that very conversation of December the
18 17th, 1997 when the President told you that you were on the
19 witness list, he also suggested that you could sign an
20 affidavit and use misleading cover stories. Isn't that
21 correct?
22 A Uh--well, I--I guess in my mind, I separate
23 necessarily signing affidavit and using misleading cover
24 stories. So, does--
25 Q Well, those two--

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1 A Those three events occurred, but they don't--they
2 weren't linked for me.
3 Q But they were in the same conversation, were they
4 not?
5 A Yes, they were.
6 Q Did you understand in the context of the
7 conversation that you would deny the--the President and your
8 relationship to the Jones lawyers?
9 A Do you mean from what was said to me or--
10 Q In the context of that--in the context of that
11 conversation, December the 17th--
12 A I--I don't--I didn't--
13 Q Okay. Let me ask it. Did you understand in the
14 context of the telephone conversation with the President
15 that early morning of December the 17th--did you understand
16 that you would deny your relationship with the President to
17 the Jones lawyers through use of these cover stories?
18 A From what I learned in that--oh, through those
19 cover stories, I don't know, but from what I learned in that
20 conversation, I thought to myself I knew I would deny the
21 relationship.
22 Q And you would deny the relationship to the Jones
23 lawyers?
24 A Yes, correct.
25 Q Good.

1 A If--if that's what it came to.
2 Q And in fact you did deny the relationship to the
3 Jones lawyers in the affidavit that you signed under penalty
4 of perjury; is that right?
5 A I denied a sexual relationship.
6 Q The President did not in that conversation on
7 December the 17th of 1997 or any other conversation, for
8 that matter, instruct you to tell the truth; is that
9 correct?
10 A That's correct.
11 Q And prior to being on the witness list, you--you
12 both spoke--
13 A Well, I guess any conversation in relation to the
14 Paula Jones case. I can't say that any conversation from
15 the--the entire relationship that he didn't ever say, you
16 know, "Are you mad? Tell me the truth." So--
17 Q And prior to being on the witness list, you both
18 spoke about denying this relationship if asked?
19 A Yes. That was discussed.
20 Q He would say something to the effect that--or you
21 would say that--you--you would deny anything if it ever came
22 up, and he would nod or say that's good, something to that
23 effect; is that right?
24 A Yes, I believe I testified to that.
25 Q Let me shift gears just a minute and ask you

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1 about--and I'm going to be delicate about this because I'm
2 conscious of people here in the room and my--my own personal
3 concerns--but I want to refer you to the first so-called
4 salacious occasion, and I'm not going to get into the
5 details. I'm not--
6 A Can--can we--can you call it something else?
7 Q Okay.
8 A I mean, this is--this is my relationship--
9 Q What would you like to call it?
10 A --so, I mean, is--
11 Q This is the--or this was--
12 A It was my first encounter with the President, so I
13 don't really see it as my first salacious--that's not what
14 this was.
15 Q Well, that's kind of been the word that's been
16 picked up all around. So--
17 A Right.
18 Q --let's day on this first--
19 A Encounter, maybe?
20 Q Encounter, okay.
21 A Okay.
22 Q So we all know what we're talking about. You had
23 several of these encounters, perhaps 10 or 11 of these
24 encounters; is that right?
25 A Yes.

1 Q Okay. Now, with regard to the first one on
2 November the 15th, 1995, you have testified to a set of
3 facts where the President actually touched you in certain
4 areas--is that right--and that's--that's where I want to go.
5 That's as far as I want to go with that question.
6 MR. CACHERIS: If that's as far as it goes, we
7 will not object--
8 MR. BRYANT: Okay.
9 MR. CACHERIS: --and if it goes any further, we
10 will object.
11 MR. BRYANT: Okay.
12 BY MR. BRYANT:
13 Q You have testified to that?
14 A Yes.
15 Q And I have the excerpts out, and I don't--but
16 they've been adopted and affirmed as true. So I'm not going
17 to get--get you looking at--have you read those excerpts.
18 A I appreciate that.
19 Q Now, in the--in later testimony before the grand
20 jury, you were given a definition, and in fact it was the
21 same definition that was used in the Paula Jones lawsuit, of
22 "sexual relations." Do you recall the--
23 A So I've read.
24 Q Yes.
25 A I was not shown that definition.

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1 Q But you were asked a question that incorporated
2 that definition.
3 A Not prior to this whole--not prior to the
4 Independent Counsel getting involved.
5 Q But--no--it was the Independent Counsels
6 themselves who asked you this question.
7 A Right. Oh, so you're--you're saying in the grand
8 jury, I was shown a definition of--
9 Q Right.
10 A Yes, that's correct.
11 Q And you admitted in that answer to that question
12 that the conduct that you were involved in, the encounter of
13 November the 15th, 1995, fit within that definition of
14 "sexual relations"?
15 A The second encounter of that evening did.
16 Q Right.
17 And were there other similar encounters later on
18 with the President, not that day, but other occasions that
19 would have likewise fit into that definition of "sexual
20 relations" in the Paula Jones case?
21 A Yes. And--yes.
22 Q There was more than one occasion where that
23 occurred?
24 A Correct.
25 Q So, if the President testifies that he did not--he

1 was not guilty of having a sexual relationship under the
2 Paula Jones definition even, then that testimony is not
3 truthful, is it?
4 MR. CACHERIS: Objection. She should not be
5 called upon to testify what was in the mind of another
6 person. She's testifying to the facts, and she has given
7 the facts.
8 MR. BRYANT: I would ask that she answer the
9 question.
10 SENATOR DeWINE: Go ahead.
11 SENATOR LEAHY: The objection is noted for the
12 record.
13 SENATOR DeWINE: The objection is noted. She may
14 answer the question.
15 THE WITNESS: I--I really--
16 SENATOR LEAHY: If she can.
17 THE WITNESS: --don't feel comfortable
18 characterizing whether what he said was truthful or not
19 truthful. I know I've testified to what I believe is true.
20 BY MR. BRYANT:
21 Q Well, truth is not a wandering standard.
22 A Well--
23 Q I would hope not. But you have testified, as I've
24 told you, that what you and he did together on November the
25 15th, 1995 fit that definition of the Paula Jones, and

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1 you've indicated that there were other occasions that
2 likewise--
3 A Yes, sir.
4 Q --that that occurred.
5 But now the President has indicated as a part of
6 his specific defense--he has filed an answer with this
7 Senate denying that this occurred, that he did these
8 actions.
9 A I know. I'm not trying to be difficult, but there
10 is a portion of that definition that says, you know, with
11 intent, and I don't feel comfortable characterizing what
12 someone else's intent was.
13 I can tell you that I--my memory of this
14 relationship and what I remember happened fell within that
15 definition.
16 If you want to--I don't know if there's another
17 way to phrase that, but I'm just not comfortable commenting
18 on someone else's intent or state of mind or what they
19 thought.
20 Q Let's move forward to December the 19th, 1997, at
21 that point you made reference to earlier.
22 A I'm sorry. Can you repeat the date again? I'm
23 sorry.
24 Q Yes. December the 19th, 1997.
25 A Okay, sorry.

1 Q At that point where you testified that you
2 received a subpoena in the Paula Jones case, and that was,
3 of course, on December the 19th, 1997.
4 Do you recall the specific time of day and where
5 you were when you were served with the subpoena?
6 A I was actually handed the subpoena at the Metro
7 entrance of the Pentagon--at the Pentagon, and the time--I
8 think it was around 4:30--4--I--I--if I've testified to
9 something different, then, I accept whatever I testified to,
10 closer to the date. Sometime in the late afternoon.
11 Q Did they call you, and you had to come out of your
12 office and go outside--
13 A Correct.
14 Q --and do that?
15 Okay. And what did you do after you accepted
16 service of the subpoena?
17 A I started crying.
18 Q Did he just give it to you and walk away, or did
19 he give you any kind of explanation?
20 A I think I made a stink. I think I was trying to
21 hope that he would convey to the Paula Jones attorneys that
22 I didn't know why they were doing this, and this is
23 ridiculous, and he said something or another, there is a
24 check here for witness fee. And I said I don't want their
25 stinking money, and so--

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1 Q What did you do after, after you got through the
2 emotional part?
3 A I went to a pay phone, and I called Mr. Jordan.
4 Q Any reason you went to a pay phone, and why did
5 you call Mr. Jordan? Two questions, please.
6 A First is because my office in the Pentagon was
7 probably a room this size and has--let's see, one, two,
8 three, four--four other people in it, and there wasn't much
9 privacy. So that I think that's obvious why I wouldn't want
10 to discuss it there.
11 And the second question was why Mr. Jordan--
12 Q Why did you call Mr. Jordan; yes.
13 A Because I couldn't call Mrs. Currie because it
14 was--I hadn't expected to be subpoenaed that soon. So she
15 was grieving with her brother's passing away, and I didn't
16 know who else to turn to. So--
17 Q And what--what occurred with that conversation
18 with Mr. Jordan?
19 A Well, I remember that--that he couldn't understand
20 me because I was crying. So he kept saying: "I don't
21 understand what you're saying. I don't understand what
22 you're saying."
23 And I just was crying and crying and crying. And
24 so all I remember him saying was: "Oh, just come here at 5
25 o'clock."

1 So I did.
2 Q You went to see Mr. Jordan, and you were inside
3 his office after 5 o'clock, and you did--is that correct?
4 A Yes.
5 Q Were--were you interrupted, in the office?
6 A Yes. He received a phone call.
7 Q And you testified that you didn't know who that
8 was that called?
9 A Correct.
10 Q Did you excuse yourself?
11 A Yes.
12 Q What--after you came back in, what--what occurred?
13 Did he tell you who he had been talking to?
14 A No.
15 Q Okay. What happened next?
16 A I know I've testified about this--
17 Q Yes.
18 A --so I stand by that testimony, and my
19 recollection right now is when I came back in the room, I
20 think shortly after he had placed a phone call to--to Mr.
21 Carter's office, and told me to come to his office at 10:30
22 Monday morning.
23 Q Did you know who Mr. Carter was?
24 A No.
25 Q Did Mr. Jordan tell you who he was?

1 A No--I don't remember.
2 Q Did you understand he was going to be your
3 attorney?
4 A Yes.
5 Q Did you express any concerns about the--the
6 subpoena?
7 A I think that happened before the phone call came.
8 Q Okay, but did you express concerns about the
9 subpoena?
10 A Yes, yes.
11 Q And what were those concerns?
12 A In general, I think I was just concerned about
13 being dragged into this, and I was concerned because the
14 subpoena had called for a hatpin, that I turn over a hatpin,
15 and that was an alarm to me.
16 Q How--in what sense was it--in what sense was it an
17 alarm to you?
18 A The hatpin being on the subpoena was evidence to
19 me that someone had given that information to the Paula
20 Jones people.
21 Q What did Mr. Jordan say about the subpoena?
22 A That it was standard.
23 Q Did he have any--did he have any comment about the
24 specificity of the hatpin?
25 A No.

1 Q And did you--
2 A He just kept telling me to calm down.
3 Q Did you raise that concern with Mr. Jordan?
4 A I don't remember if--if I've testified to it, then
5 yes. If--I don't remember right now.
6 Q Did--would you have remembered then if he made any
7 comment or answer about the hatpin?
8 A I mean, I think I would.
9 Q And you don't remember?
10 A I--I remember him saying something that it
11 was--you know, calm down, it's a standard subpoena or
12 vanilla subpoena, something like that.
13 Q Did you ask Mr. Jordan to call the President and
14 advise him of the subpoena?
15 A I think so, yes. I asked him to inform the
16 President. I don't know if it was through telephone or not.
17 Q And you did that because the President had asked
18 you to make sure you let Betty know that?
19 A Well, sure. With Betty not being in the office, I
20 couldn't--there wasn't anyone else that I could call to get
21 through to him.
22 Q Did Mr. Jordan say to you when he might see the
23 President next?
24 A I believe he said he would see him that evening at
25 a holiday reception.

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1 Q Did Mr. Jordan during that meeting make an inquiry
2 about the nature of the relationship between you and the
3 President?
4 A Yes, he did.
5 Q What was that inquiry?
6 A I don't remember the exact wording of the
7 questions, but there were two questions, and I think they
8 were something like did you have sex with the President or
9 did he--and if--or did he ask for it or some--something like
10 that.
11 Q Did you--what did you suspect at that point with
12 these questions from Mr. Jordan in terms of did he know or
13 not know about this?
14 A Well, I wasn't really sure. I mean, two things.
15 I think there is--I know I've testified to this, that there
16 was another component to all of this being Linda Tripp and
17 her--what she might have led me to believe or led me to
18 think and how that might have characterized how I was
19 perceiving the situation.
20 I--I sort of felt that I didn't know if he was
21 asking me as what are you going to say because I--I don't
22 know these answer to these questions, or he was asking me as
23 I know the answer to these questions and what are you going
24 to say. So, either way, for me, the answer was no and no.
25 Q And that's just what I wanted to ask you--you did

1 answer no to both of those, but--
2 A Yes.
3 Q --as you explained--you didn't mention this
4 directly, but you mentioned in some of your earlier
5 testimony about it, that this was kind of a wink and--you
6 thought this might be a wink-and-nod conversation, where he
7 really knew what was going on, but--
8 A Well, I think that's what I just said.
9 Q --he was testing you to see what you would say?
10 A --that I wasn't--I--that was one of the--that was
11 one of the things that went through my mind. I mean, it was
12 not--I think that's what I just testified to, didn't I?
13 Q You didn't use the term "wink-and-nod," though.
14 A Oh.
15 Q Did you have any conversation with Mr. Jordan
16 during that meeting about the specifics of an affidavit?
17 A No.
18 Q Do you know if the subject of an affidavit even
19 came up?
20 A I don't think so.
21 Q What happened next? Is that when he made the call
22 to Mr. Carter, after this conversation?
23 A No. He made the call to Mr.--I think--well, I
24 think he made the call to Mr. Carter, uh, shortly after I
25 came back into the room, but I could be wrong.

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1 Q And then the meeting concluded after that--after
2 teh appointment was set up with Mr. Carter, the meeting
3 concluded?
4 A Yes.
5 SENATOR DeWINE: Mr. Bryant, we're going to need
6 to break sometime in the next 5 minutes. Is this a good
7 time, or do you want to complete--
8 MR. BRYANT: This is a good time.
9 SENATOR DeWINE: Okay. We'll take a 5-minute
10 break.
11 THE VIDEOGRAPHER: We're going off the record at
12 12:04 p.m.
13 [Recess.]
14 THE VIDEOGRAPHER: We are going back on the record
15 at 12:16 p.m.
16 SENATOR DeWINE: We are back on the record.
17 Let me advise House Managers that they have
18 consumed one hour and 54 minutes.
19 Mr. Bryant, you may proceed.
20 MR. BRYANT: Thank you, sir.
21 BY MR. BRYANT:
22 Q Ms. Lewinsky, let me just cover a couple of quick
23 points, and then I'll move on to another area, at least the
24 next meeting with Mr. Jordan and eventual meeting with Mr.
25 Carter.

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1 Back when issues of--we were discussing the issues
2 of cover stories, uh, would you tell me about the, uh, code
3 name with Betty Currie, the President's secretary and how
4 that worked in terms of the use--I guess the word "Kay," the
5 name "Kay," and were there other code names, and when did
6 this start?
7 A Sure. First, let me say there's--from my
8 experience with working with Independent Counsel on this
9 subject area, there--my initial memory of things and then
10 what I came to learn from, from other evidence, I think, are
11 sort of two different things. So I initially hadn't
12 remembered when that had happened or what had happened.
13 The name "Kay" was used because Betty and I first
14 came to know each other and know--or, I guess I came to know
15 of Mrs. Currie through Walter Kaye, who was a family friend,
16 and I think that that--I don't remember when we started
17 using it, but I know that by January at some point--by let's
18 just say January, I think, 12th or 13th, we were doing that.
19 So I know I was beyond paranoid at this point.
20 Q Was "Kay" your code name, so to speak?
21 A I believe--yes, yes. So she was "Kay" and I was
22 "Kay."
23 Q So any time, uh--not any time--so you used the
24 "Kay" name interchangeably between the two--just between the
25 two of you?

1 A Just for paging messages.

2 Q And, uh, when we're talking about that Ms. Currie

3 would WAVE you into the White House, would that occur when

4 the President was there? I mean, you went in--

5 A There--there were times that I went to see Mrs.

6 Currie when the President wasn't there.

7 Q Right. And she would WAVE you in.

8 A Correct.

9 Q And there were times other people WAVE'd you in

10 when the President wasn't there?

11 A Correct.

12 Q But when the President was there, and you were

13 going to see the President, Ms. Currie was the one that

14 always WAVE'd you in?

15 A Yes, and I think, unless--maybe on the occasions

16 of the radio address or it was an official function.

17 Q Now, I think we talked a little bit about this.

18 During your December the 19th meeting with Mr. Jordan, uh,

19 he did schedule you a time to meet, uh, and introduce you to

20 Mr. Carter?

21 A Correct.

22 Q And that--when was that meeting with Mr. Carter

23 scheduled?

24 A Uh, I believe for--it was Monday morning. I think

25 it was 11 o'clock, around--sometime around that time.

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1 Q And my notes say that would have been December the
2 22nd, 1997.
3 A Correct.
4 Q Did you, uh, call to meet him earlier, and if so,
5 why?
6 A Yes. I had--I had had some concerns over the
7 weekend that I didn't know if--if Mr. Jordan knew about the
8 relationship or didn't know about the relationship. I was
9 concerned about--I'm sure you can understand that I was
10 dealing with a set of facts that were very different from
11 what the President knew about being pulled into this case in
12 that I had, in fact, disclosed information. So I was very
13 paranoid, and, uh, I, uh, I--I was trying to--trying to see
14 what Mr. Jordan knew was--was trying to inform him, was
15 trying to just get a better grasp of what was going on.
16 Is that--is that clear? No?
17 Q You were--you were worried that Mr. Jordan didn't
18 have a-- did not have a grasp of what was really going on?
19 A Correct.
20 Q And that would be in terms of actually knowing the
21 real relationship between you and the President?
22 A Correct.
23 Q So how did you attempt to correct that?
24 A Well, I--I sort of--I think the way it came up was
25 I said, uh--I think I said to Mr. Jordan--I know I've

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1 testified to this, uh, that--something about what about if
2 someone overheard the phone calls that I had with him. And
3 Mr. Jordan, I believe, said something like: So what? The
4 President's allowed to call people.
5 And then--well.
6 Q Now, was this at a meeting on December the 22nd,
7 before you went to see Mr. Carter?
8 A Correct.
9 Q I assume you--you went to Mr. Jordan's office
10 first, and then he was going to escort you over and turn you
11 over to Mr. Carter?
12 A Correct.
13 Q And it was at that meeting that you brought up the
14 possibility of someone overhearing a conversation with the
15 President and you--between the two of you?
16 A Yes.
17 Q What else was said at that meeting with Mr.
18 Jordan?
19 A I think it covered a topic that I thought we
20 weren't discussing here.
21 Q Uh, okay. All right. I'm not sure.
22 A Okay. Well, I--I know I've testified to this in
23 my--I think in all three, if not both of my grand jury
24 appearances, and I'm very happy to stand by that testimony.
25 Q All right. I'm going to go around this a little

1 bit without getting into details. You had a conversation
2 with Mr. Jordan to detail--to give him more specific details
3 of your relationship with the President.
4 A Uh, to give him more details of some of the types
5 of phone calls that we had.
6 Q Okay. Uh, did you ask Mr. Jordan had he spoken
7 with the President during that conversation?
8 A Yes, I believe so.
9 Q And why was this--why did you need to know that,
10 or why was it important that you know that?
11 A I wanted the President to know I'd been
12 subpoenaed.
13 Q Did, uh--in your, uh, proffer, you say that you
14 made it clear to Mr. Jordan that you would deny the sexual
15 relationship. Do you recall saying that in your proffer?
16 A Uh, I know--I know that was written in my proffer.
17 Q Okay. Well, I guess the better question is did
18 you--did you in fact make that clear to Mr. Jordan that you
19 would deny a sexual relationship with the President?
20 A I--I'm not really sure. I--this is sort of an
21 area that, uh, has been difficult for me. I think, as I
22 might have discussed in the grand jury, that when I
23 originally wrote this proffer, it was to be a road map and,
24 really, something to help me to get immunity and not
25 necessarily--it's not perfect.

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1 Uh, so, I think that was my intention--I know that
2 was my intention of--or at least what I thought I was doing-
3 -but I never really thought that this would become the be-
4 all and end-all, my proffer.
5 Q Did, uh, did you bring with you to the meeting
6 with Mr. Jordan, and for the purpose of carrying it, I
7 guess, to Mr. Carter, items in response to this request for
8 production?
9 A Yes.
10 Q Did you discuss those items with Mr. Jordan?
11 A I think I showed them to him, but I'm not 100
12 percent sure. If I've testified that I did, then I'd stand
13 by that.
14 Q Okay. How did you select those items?
15 A Uh, actually, kind of in an obnoxious way, I
16 guess. I--I felt that it was important to take the stand
17 with Mr. Carter and then, I guess, to the Jones people that
18 this was ridiculous, that they were--they were looking at
19 the wrong person to be involved in this. And, in fact, that
20 was true. I know and knew nothing of sexual harassment. So
21 I think I brought the, uh, Christmas cards, that I'm sure
22 everyone in this room has probably gotten from the President
23 and First Lady, and considered that correspondence, and some
24 innocuous pictures and--they were innocuous.
25 Q Were they the kind of items that typically, an

1 intern would receive or, like you said, any one of us might
2 receive?
3 A I think so.
4 Q In other words, it wouldn't give away any kind of
5 special relationship?
6 A Exactly.
7 Q And was that your intent?
8 A Yes.
9 Q Did you discuss how you selected those items with
10 anybody?
11 A I don't believe so.
12 Q Did Mr. Jordan make any comment about those items?
13 A No.
14 Q Were any of these items eventually turned over to
15 Mr. Carter?
16 A Yes.
17 Q And did you tell Mr. Jordan at that meeting that
18 morning that these were not all of the gifts?
19 A I think I--I know I sort of alluded to that in my
20 proffer, and I don't, uh--it's possible. I don't have a
21 specific recollection of that.
22 Q And do you have a recollection of any response he
23 may have made if you said that?
24 A No.
25 Q That--did you tell Mr. Jordan that day that the,

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1 uh, President gave you a hatpin and that the hatpin was
2 mentioned in the subpoena?
3 A No.
4 Q Did you discuss the hatpin with Mr. Jordan?
5 A On the 22nd?
6 Q Yes.
7 A No.
8 Q Any other time?
9 A Yes.
10 Q When was that?
11 A On the 19th.
12 Q Okay, and what was--I think I may have missed
13 that, going through that. Tell me about it.
14 A Actually, I think we--we went through it.
15 Q You just maybe mentioned it.
16 A I mentioned it when I first mentioned to him the
17 subpoena that the hatpin had concerned me.
18 Q What was the significance of that hatpin to you?
19 That seems to stand out. Was that--was that a--
20 A Right. I think, as I mentioned before, it was an
21 alarm to me because it was a specific item--
22 Q Right.
23 A --in this list of generalities--I don't know
24 generalities, but of general things--you sort of go--hatpin?
25 Q Right. I recall that, but I--I think my question

1 was, was it of any special significance to you.
2 A Sure.
3 Q Was it, like, the first gift or something, that it
4 really stood out above the others?
5 A Yes. It--it was--it was the first gift he gave
6 me. It was a thoughtful gift. It was beautiful.
7 Q And was the hatpin in that list, that group of
8 items that you carried to surrender to Mr. Carter?
9 A No.
10 Q And the hatpin was not in that list of items that
11 you showed Mr. Jordan?
12 A I--I didn't show Mr. Jordan a list of items.
13 Q No--I thought you said you showed him the items.
14 A Correct.
15 Q And the hatpin was not in that group--I may have
16 "list"--
17 A Oh.
18 Q --but the hatpin was not in that group of items--
19 A No, it was not.
20 Q --that you showed Mr. Jordan. Okay.
21 Tell us, if you would, how you arrived at Mr.
22 Carter's. I know you wrote in a car, but Mr. Jordan was
23 with you--
24 A Yes.
25 Q --you went in--and tell us what happened.

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1 A Uh, in the car, we spoke about job things. I know
2 he mentioned something about, I think, getting in touch with
3 Howard Pastor, and I mentioned to Mr. Jordan that Mr. Bacon
4 knew Mr. Pastor and had already gotten in touch with him,
5 and so he should--I just wanted Mr. Jordan to be aware of
6 that.
7 Uh, we talked about--it was really all about the
8 job stuff because Mr. Jordan--the man driving the car--I
9 didn't want to discuss anything with the case.
10 Q But once you arrived, and Mr. Jordan made the
11 introduction--
12 A Correct.
13 Q --between the two of you. And did he explain to
14 Mr. Carter your situation, or did he go beyond just the
15 perfunctory introduction?
16 A No.
17 Q Did he leave?
18 A Yes.
19 Q Did you, uh--I guess, generally, what did you
20 discuss with Mr. Carter?
21 A The same vanilla story I had kind of--well,
22 actually, not even that. I discussed with Mr. Carter the,
23 uh, that this was ridiculous, that I was angry, I didn't
24 want to be involved with this, I didn't want to be
25 associated with Paula Jones, with this case.

1 Q Did you, uh--
2 A I asked if I could sue Paula Jones. [Laughing.]
3 Q Did you discuss an affidavit?
4 A Yes, I believe I mentioned an affidavit.
5 Q Did you mention, uh, the, uh--well, was there
6 discussion about how you could sign an affidavit that might
7 be--allow you to skirt being called as a witness?
8 A Mr. Carter said that was a possibility but that
9 there were other things that we should try first; that he,
10 uh, thought--well, actually, can I ask my attorneys a
11 question for a moment?
12 MR. BRYANT: Uh, sure.
13 [Witness conferring with counsel.]
14 SENATOR DeWINE: Counsel, Ms. Lewinsky's mike is
15 carrying; it's picking up, so we don't want to--
16 THE WITNESS: Sorry. I was only saying nice
17 things about you all.
18 SENATOR DeWINE: Thank you.
19 [Laughter.]
20 MR. CACHERIS: So that you'll know what we're
21 discussing here, as you know, Ms. Lewinsky is not required
22 to give up her lawyer-client privileges, and the question we
23 don't know the answer to and would like to address after
24 lunch is whether in fact Mr. Carter has testified to this
25 conversation.

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1 Therefore, perhaps--

2 SENATOR DeWINE: All right. Maybe counsel at this
3 point could--could you rephrase--rephrase the question or
4 ask another question, and after lunch, we can come back--

5 MR. CACHERIS: Or come back.

6 SENATOR DeWINE: Well, I don't want--I don't think
7 he has to move off the general area if he can--I'll leave
8 that up to counsel.

9 MR. BRYANT: There may be some misunderstanding
10 or--

11 SENATOR DeWINE: Why don't you rephrase the
12 question, and we'll see where we are.

13 MR. BRYANT: --on this issue of--well, on this
14 issue of the attorney-client privilege. It is our
15 understanding that she is able to testify. But again, I
16 don't know, uh, if we're going to resolve that right now.

17 SENATOR DeWINE: Why don't we try to resolve that
18 issue over lunch, and--

19 MR. BRYANT: Because I do have other questions
20 that would relate to this area.

21 SENATOR DeWINE: --you can stay in this general
22 area.

23 MR. BRYANT: Well, I'm not sure I can stay in this
24 area too far without other questions that might arguably be
25 involved in that privilege. I can ask them, and you can

1 object if you think they're within that range.
2 MR. CACHERIS: Well, as I said, it's our
3 understanding that under her agreement with the Independent
4 Counsel, she has not been required to waive her lawyer-
5 client privilege, and we don't want to do so here. That's
6 that simple. And, Mr. Bryant, I want to check to see if Mr.
7 Carter has testified about this. If he has, then we might
8 be objecting--
9 MR. BRYANT: Well, she has already, I think,
10 waived that privilege through talking with the FBI and those
11 folks. I mean, we have statements that concern those
12 conversations--
13 SENATOR DeWINE: Well, let's, instead of
14 MR. BRYANT: And the 302's.
15 SENATOR DeWINE: Counsel, let me just--if I could
16 interrupt both of you, to keep moving here, Mr. Bryant, you
17 have a choice. You can continue on this line of
18 questioning, and we will have to deal with that, or you can
19 move off of it, and in 20 minutes we'll be at a lunch break
20 and then we can try to resolve that.
21 MR. BRYANT: To be clear and fair, let's just--let
22 me postpone the rest of this--
23 SENATOR DeWINE: That will be fine.
24 MR. BRYANT: --exam, and we'll move over to
25 December 28th, and we'll come back if it's appropriate.

1 SENATOR DeWINE: That will be fine.

2 THE WITNESS: I'm sorry. I'm not trying to be

3 difficult. I'm sorry.

4 MR. BRYANT: No. That's a valid concern; it

5 really is.

6 Let's talk a minute--I just don't want to forget

7 to do this; unless I make notes, I forget.

8 SENATOR LEAHY: You've got enough people here

9 making notes; I don't think it'll be--I don't think it'll be

10 forgotten.

11 BY MR. BRYANT:

12 Q We're going to move in the direction of the

13 December 28th, 1997 meeting, and I'm going to ask you at

14 some point did you meet with the President later in

15 December.

16 A Yes.

17 Q Okay, and what date was that?

18 A December 28th, 1997.

19 Q Thank you. How did the meeting come about?

20 A Uh, I contacted Mrs. Currie after Christmas and

21 asked her to find out if the President still wanted to give

22 me his Christmas present, or my Christmas present.

23 Q Did Ms. Currie get back to you?

24 A Yes, she did.

25 Q And what was her response?

1 A To come to the White House at 8:30 a.m. on the
2 28th.
3 Q And that would have been Sunday?
4 A Yes.
5 Q Did you in fact go to the White House on that
6 date?
7 A Yes.
8 Q And how did you get in?
9 A I believe the Southwest Gate.
10 Q Did Ms. Currie WAVE you in?
11 A I think so.
12 Q You've testified to that previously.
13 A Okay, then I accept that.
14 Q This, uh, meeting on the 28th was a Sunday, and
15 Ms. Currie--again, according to your prior testimony--WAVE'd
16 you in. This was all consistent with what the President had
17 told you to do about, number one, coming on weekends; is
18 that correct?
19 A I--I--I don't think me coming in on that Sunday
20 had--I mean, for me, my memory of it was that it was a
21 holiday time, so it could have been any day. It's pretty
22 quiet around the White House from Christmas to New Year's.
23 Q And it would have been consistent with her WAVE-
24 ing you in when she was there at work on Sunday?
25 A Yes.

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1 Q That was unusual, though, for her to be in on
2 Sunday, wasn't it?
3 A I--I--I--I think so, but I mean, that's her--I
4 think that's something you'd have to ask her.
5 MR. BRYANT: I'm concerned about the time. I'm
6 going to go ahead and continue with this, and we'll just
7 stop wherever we have a--whenever you tell us to stop. This
8 will take a little bit longer than another 15 minutes or so;
9 but it's appropriate, I think, for us to continue.
10 SENATOR DeWINE: Well, frankly, it's up to you.
11 MR. BRYANT: Okay.
12 SENATOR DeWINE: Do you have a problem in breaking
13 it?
14 MR. BRYANT: No; no, I don't think so.
15 SENATOR DeWINE: I mean, if you do, we can take
16 lunch now. I'll leave that up to you.
17 MR. BRYANT: Uh, why don't we take the lunch now--
18 SENATOR DeWINE: All right. No one has any
19 objection to that, we will do that.
20 THE WITNESS: I never object to food.
21 SENATOR DeWINE: Let me just announce to counsel
22 you have used 2 hours and 14 minutes. It is now 20 minutes
23 until 1. We'll come back here at 20 minutes until 2. And
24 we need during this break also to see counsel and try to
25 resolve the other issue prior to going back in. This is the

1 privilege issue.

2 SENATOR LEAHY: Did counsel for Ms. Lewinsky have

3 to make a couple phone calls first, before we have that

4 discussion? I think--

5 SENATOR DeWINE: My suggestion would be we do that

6 at the last 15 minutes of the break.

7 SENATOR LEAHY: I think he said he wanted to call

8 Mr. Carter; that's why--

9 MR. CACHERIS: Meet you back up here?

10 SENATOR DeWINE: Yes. I would also--the sergeant-

11 at-arms has asked me to announce that the food is on this

12 floor, and since we have a very limited period of time, we

13 suggest you try to stay on the floor.

14 MS. HOFFMANN: We were planning to go back--

15 SENATOR DeWINE: Except--I understand. I know

16 that you're--

17 MR. CACHERIS: We have our own arrangements.

18 SENATOR DeWINE: I know that you have your room,

19 and you've made your own arrangements, and that's fine.

20 So we will start back in one hour.

21 THE VIDEOGRAPHER: We are going off the record at

22 12:39 p.m.

23 [Whereupon, at 12:39 p.m., the deposition was

24 recessed, to reconvene at 1:39 p.m. this same day.]

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1 A F T E R N O O N S E S S I O N

2 [1:43 p.m.]

3 THE VIDEOGRAPHER: We are going back on the record

4 at 13:43 hours.

5 SENATOR DeWINE: We are now back on the record.

6 As we broke for lunch, there was an objection that

7 had been made by Ms. Lewinsky's counsel. Let me call on

8 them at this point for statements.

9 MR. CACHERIS: Yes. We have examined the record

10 during the course of the break, and while we know that the

11 immunity agreement does provide for Ms. Lewinsky to maintain

12 her lawyer-client privilege, we think in this instance, the

13 matter has been testified so fully that it has been waived.

14 So the objection that we lodged is withdrawn.

15 SENATOR DeWINE: Thank you very much.

16 Mr. Bryant, you may proceed.

17 MR. BRYANT: Thank you, Mr. Senator.

18 BY MR. BRYANT:

19 Q We've got you to the point where Mr. Jordan has

20 escorted you to Mr. Carter's office and has departed, and

21 you and Mr. Carter have conversations.

22 Generally, what did you discuss with Mr. Carter?

23 A I guess the--the reasons why I didn't think I

24 should be called in this matter.

25 Q Did he ask you questions?

1 A Yes.
2 Q What type of questions did he ask you?
3 A Um, they ranged from where I lived and where I was
4 working to did I have a relationship with the President,
5 did--everything in between.
6 Q When he--when he asked you about the relationship,
7 did you understand he meant a sexual-type relationship?
8 A He asked me questions that--that indicated he was
9 being specific.
10 Q And did--did you deny such a relationship?
11 A Yes, I did.
12 Q Did he ask you questions about if you were ever
13 alone with the President?
14 A Yes, he did.
15 Q And did you deny that?
16 A I think I mentioned that I might have brought the
17 President papers on occasion, may have had an occasion to be
18 alone with him, but not--not anything I considered
19 significant.
20 Q But that was not true either, was it?
21 A No.
22 Q And in fact, that--the fact that you brought him
23 papers, that was part of the cover-up story?
24 A Correct.
25 Q I'm unclear on a point I want to ask you. Also,

1 did Mr. Carter ask you about how you perhaps were pulled
2 into this case, and you gave some answer about knowing Betty
3 Currie and--and Mr. Kaye? Does that ring bells? You gave
4 that testimony in your deposition.
5 A That that's how I got pulled into the case?
6 Q Right. Did--
7 A May I see that, please?
8 Q It's about your denying the relationship with the
9 President, and you think maybe you got pulled into the case.
10 It's--certainly, it's--it's in your grand jury--okay.
11 It's--it's in the August 1 interview, page 9. This was a
12 302 exam from the FBI.
13 A Um--
14 MR. BRYANT: Let me give that to her. Let me just
15 give it to her to refresh her memory. I'm not going to put
16 it in evidence, although it's--it should be there.
17 [Handing document.]
18 [Witness perusing document.]
19 THE WITNESS: I don't think that's an accurate
20 representation of what I might have said in this interview.
21 BY MR. BRYANT:
22 Q Okay. Would you--how would you have related
23 Walter Kaye in that interview? How would his name have come
24 up?
25 A In this interview or with Mr. Carter?

1 Q Well, in the interview with Mr. Carter that I
2 assume was sort of summarized in that--
3 A Right.
4 Q --302, but, yes, with Mr. Carter.
5 A Uh, I think I mentioned that I was friendly with
6 Betty Currie, the President's secretary.
7 Q And how would Mr. Kaye's name have come up in the
8 conversation?
9 A Because of how I met Ms. Currie was
10 through--that's how I came to know of Ms. Currie and--and
11 first introduced myself to her. Excuse me.
12 Q Let's go back now and resume where we were before
13 the lunch break. We were talking about the December visit
14 to the White House and the conversation with the President.
15 You had discussed--well, I think we're to the point where
16 perhaps you--or I'll ask you to bring up your discussion
17 with the President about the subpoena and the request for
18 production.
19 A Um, part way into my meeting with the President, I
20 brought up the concern I had as to how I would have been
21 put--how I might have been alerted or--not alerted, but how
22 I was put on the witness list and how I might have been
23 alerted to the Paula Jones' attorneys, and that that was--I
24 was sort of concerned about that. So I discussed that a
25 little, and then I said, um, that I was concerned about the

1 hatpin. And to the best of my memory, he said that that had
2 concerned him as well, and--
3 Q Could he have said that bothered him?
4 A He--he could have. I--I mean, I don't--I know
5 that sometimes in the--in my grand jury testimony, they've
6 put quotations around things when I'm attributing statements
7 to other people, and I didn't necessarily mean that those
8 were direct quotes. That was the gist of what I remembered
9 him saying. So, concern, bothered, it doesn't--
10 Q Was--was there a discussion at that point as to
11 how someone might have--may have discovered the--the hatpin
12 and why?
13 A Well, he asked me if I had told anybody about it,
14 and I said no.
15 Q But the two of you reached no conclusion as to how
16 that hatpin came--
17 A No.
18 Q --to appear on the motion?
19 A No.
20 Q Did he appear at all, I think, probably surprised
21 that--that you had received a request for production of
22 documents or the--the hatpin was on that document?
23 A I didn't discuss--we didn't discuss documents,
24 request for documents, but with regard to the hatpin, um, I
25 don't remember him being surprised.

1 Q Mm-hmm. How long did the discussion last about
2 the--this request for production of--of the items?
3 A The topic of the Paula Jones case, maybe 5
4 minutes. Not very much.
5 Q What else was said about that?
6 A About the case?
7 Q Yes.
8 A There was--then, at some point in this
9 discussion--I think it was after the hatpin stuff--I had
10 said to him that I was concerned about the gifts and maybe I
11 should put them away or possibly give them to Betty, and as
12 I've testified numerously, his response was either ranging
13 from no response to "I don't know" or "let me think about
14 it."
15 Q Did the conversation about the--the gifts that you
16 just mentioned, did that immediately follow and tie into, if
17 you will, the conversation about the request for production
18 of items, the hatpin and so forth? Did one lead to the
19 other?
20 A I don't remember. I know the gift conversation
21 was subsequent to the hatpin comment, but I--I don't
22 remember if one led to the other.
23 Q What else happened after that?
24 A Hmm, I think we went back to sort of--we left that
25 topic, kind of went back to the visit.

1 Q Did--which included exchanging the Christmas
2 gifts?
3 A Correct.
4 Q Okay.
5 A I had already--he had already given me my presents
6 at this point.
7 Q Okay. Did--he gave you some gifts that day, and
8 my question to you is what went through your mind when he
9 did that, when you knew all along that you had just received
10 a subpoena to produce gifts. Did that not concern you?
11 A No, it didn't. I was happy to get them.
12 Q All right. Why did it--beyond your happiness in
13 receiving them, why did the subpoena aspect of it not
14 concern you?
15 A I think at that moment--I mean, you asked me when
16 he gave me those gifts. So, at that moment, when I was
17 there, I was happy to be with him. I was happy to get these
18 Christmas presents. So I was nervous about the case, but I
19 had made a decision that I wasn't going to get into it too
20 much--
21 Q Well--
22 A --with a discussion.
23 Q --have you in regards to that--you've testified in
24 the past that from everything that the President had told
25 you about things like this, there was never any question

1 that you were going to keep everything quiet, and turning
2 over all the gifts would prompt the Jones attorneys to
3 question you. So you had no doubt in your mind, did you
4 not, that you weren't going to turn these gifts over that he
5 had just given you?
6 A Uh, I--I think the latter half of your statement
7 is correct. I don't know if you're reading from my direct
8 testimony, but--because you said--your first statement was
9 from everything the President had told you. So I don't know
10 if that was--if those were my words or not, but I--no, I
11 was--I--it--I was concerned about the gifts. I was worried
12 someone might break into my house or concerned that they
13 actually existed, but I wasn't concerned about turning them
14 over because I knew I wasn't going to, for the reason that
15 you stated.
16 Q But the pattern that you had had with the
17 President to conceal this relationship, it was never a
18 question that, for instance, that given day that he gave you
19 gifts that you were not going to surrender those to the
20 Jones attorneys because that would--
21 A In my mind, there was never a question, no.
22 Q I'm just actually looking at your deposition on
23 page--no, I'm sorry--your grand jury proceedings of August
24 the 6th, just to be clear, since you raised that question.
25 1004 in the book, appendices.

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1 You indicate that in response to a question, "What
2 do you think the President is thinking when he is giving you
3 gifts when there is a subpoena covering gifts. I mean, does
4 he think in any way, shape or form that you're going to be
5 turning these gifts over?" And you answer is, "You know, I
6 can't answer what he was thinking, but, to me, it was--there
7 was never a question in my mind, and I--from everything he
8 said to me, I never questioned him that we were ever going
9 to do anything but keep this private. So that meant deny
10 it, and that meant do whatever appropriate--take whatever
11 appropriate steps needed to be taken, you know, for that to
12 happen, meaning that if--if I had to turn over every
13 gift--if I had turned over every gift he had given me--first
14 of all, the point of the affidavit and the point of
15 everything was to try to avoid a deposition. So where I'd
16 have to sort of--you know, I wouldn't have to lie as much as
17 I would necessarily in an affidavit how I saw it," and you
18 continue on, just one short paragraph.
19 A Right.
20 Q "So, by turning over all of these gifts, it would
21 at best prompt him to want to question me about what kind of
22 friendship I had with the President, and they would want to
23 speculate and they'd leak it, and my name would be trashed
24 and he would be in trouble."
25 So you recall giving that testimony?

1 A Yes. I accept--I accept what's said here.
2 Q Okay.
3 A It's a little different from what you said, but
4 very close.
5 Q Thank you.
6 Did the President ever tell you to turn over the
7 gifts?
8 A Not that I remember.
9 Q Now, is that--does that bring us to the end of
10 this conversation with the President, or did other things
11 occur?
12 A I think that the aspect of where this case is
13 related, yes.
14 Q Okay. And then you left, and where did you go
15 when you left the White House?
16 A I think I went home.
17 Q This is at--at your apartment?
18 A My mother's apartment.
19 Q Mother's apartment.
20 Did you later that day receive a call from Betty
21 Currie?
22 A Yes, I did.
23 Q Tell us about that.
24 A I received a call from--from Betty, and to the
25 best of my memory, she said something like I understand you

1 have something for me or I know--I know I've testified to
2 saying that--that I remember her saying either I know you
3 have something for me or the President said you have
4 something for me. And to me, it's a--she said--I mean, this
5 is not a direct quote, but the gist of the conversation was
6 that she was going to go visit her mom in the hospital and
7 she'd stop by and get whatever it was.
8 Q Did you question Ms. Currie or ask her, what are
9 you talking about or what do you mean?
10 A No.
11 Q Why didn't you?
12 A Because I assumed that it meant the gifts.
13 Q Did--did you have other telephone calls with her
14 that day?
15 A Yes.
16 Q Okay. What was the purpose of those
17 conversations?
18 A I believe I spoke with her a little later to find
19 out when she was coming, and I think that I might have
20 spoken with her again when she was either leaving her house
21 or outside or right there, to let me know to come out.
22 Q Do--at that time, did you have the caller
23 identification--
24 A Yes, I did.
25 Q --on your telephone?

1 A Yes.
2 Q And did you at least on one occasion see her cell
3 phone number on your caller-ID that day?
4 A Yes, I did.
5 Q Now, Ms. Currie has given different versions of
6 what happened there, but I recall one that she mentioned
7 about Michael Isikoff, that you had called her and said
8 Michael Isikoff is calling around or called me--
9 A Mm-hmm.
10 Q --about some gifts.
11 Did Mr. Isikoff ever call you about the gifts?
12 A No.
13 Q Okay. Would there have been--would there have
14 been any reason for you not to have carried the gifts to Ms.
15 Currie had you wanted her--had you called her, would you
16 have had her come over to get them from you, or does that--
17 A Probably not.
18 Q I mean, is there--is there any doubt in your mind
19 that she called you to come pick up the gifts?
20 A I don't think there is any doubt in my mind.
21 Q Okay. Let me ask was--I think you did something
22 special for her, as I recall, too, or her mother. Did you
23 prepare a plant or something for her to pick up?
24 A Um, no. I just--
25 Q To take to her mother?

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1 A I bought a small plant and a balloon.

2 Q Okay. What was your understanding about her

3 mother, and was--

4 A Oh, I--I knew her mom was in--was in the hospital

5 and was sick, and I think this was her second trip to the

6 hospital in several months, and it had been a tough year.

7 Q And was she--was Mrs. Currie coming by your place

8 on her way to visit her mother in the hospital? Do you know

9 that?

10 A That's what I remember her saying.

11 Q So you prepared--and you bought a gift for her

12 mother?

13 A Correct.

14 Q Okay. Do you know what kind of time frame this

15 covered? First of all, it was the same day, December the

16 28th, 1997?

17 A Seven, yes.

18 Q Do you know what kind of time frame it covered?

19 A I think it was afternoon. I know I've testified

20 to around 2 o'clock.

21 Q Could it have been later?

22 A Sure.

23 Q So, when Betty Currie came, what--what did you

24 have prepared for her?

25 A I had a box from the Gap with some of the presents

1 the President had given me, taped up in it.
2 Q What happened when she arrived?
3 A Uh, I think I walked out to the car and asked her
4 to hold onto this, and I think we talked about her mom for a
5 few minutes. Um--
6 Q Did she call you right before she arrived, or did
7 you just go wait for her in the building?
8 A I think she called me right before she--at some
9 point, I think, before she--either when she was leaving or
10 she was outside.
11 Q Do you know--did you have any indication from Ms.
12 Currie what she was going to do with that box of gifts?
13 A Um, I know I've testified to this. I don't--I
14 don't remember. I think maybe she said something about
15 putting it in a closet, but whatever I--I stand by whatever
16 I've said in my testimony about it.
17 Q But she was supposed to keep these for you?
18 A Well, I had asked her to.
19 Q Okay. Did Ms. Currie ask you at any time about
20 what was in the box?
21 A No, or not that I recall, I guess I should say.
22 Q What was the--in your mind, what was the purpose
23 of having Ms. Currie retain these gifts as opposed to
24 another friend of yours?
25 A Hmm, I know I've testified to this, and I

1 can't--can I look at my grand jury--I mean, I don't really
2 remember sitting here right now, but if I could look at my
3 grand jury testimony, I--or I'd just stand by it.
4 Q We will pass that to you.
5 A Okay. Thank you.
6 [Witness handed documents.]
7 BY MR. BRYANT:
8 Q The answer I'm looking for is--if this refreshes
9 your recollection is that turning these over was a
10 reassurance to the President that everything was okay. Is
11 that--
12 A Can I read it in context, please?
13 Q Sure, sure.
14 A Thank you.
15 [Witness perusing document.]
16 THE WITNESS: I--I--I stand by this testimony. I
17 mean, I'd just note that it--what I'm saying here about
18 giving it to the President or the assurance to the President
19 is how I saw it at that point, not necessarily how I felt
20 then. So I think you asked me what--why I didn't at that
21 point, and I'm just--that's what's a little more clear
22 there, just to be precise. I'm sorry.
23 BY MR. BRYANT:
24 Q Okay. Did you have any later conversations with
25 either Ms. Currie or the President about these gifts in the

1 box?

2 A No.

3 Q Let me direct your attention to your meeting with

4 Vernon Jordán on December the 31st of 1997. Was that to go

5 back and talk about the job again?

6 A A little bit, but the--the--for me, the point of

7 that meeting was I had gotten to a point where Linda Tripp

8 wasn't returning my phone calls, and so I felt that I needed

9 to devise some way, that somehow--to kind of cushion the

10 shock of what would happen if Linda Tripp testified all the

11 facts about my relationship, since I had never disclosed

12 that to the President. So that was sort of my intention in

13 meeting with Mr. Jordan, was hoping that I could give a

14 little information and that would get passed on.

15 Q This was at a meeting for breakfast at the Park

16 Hyatt Hotel?

17 A Yes.

18 Q Were just the two of you present?

19 A Yes.

20 Q Did you discuss other things, other than Linda

21 Tripp and your job search?

22 A I think we talked about what each of us were doing

23 New Year's Eve.

24 Q Specifically about some notes that you had at your

25 apartment?

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1 A Oh, yes. I'm sorry.

2 Um, well, I mean, that really was in relation to

3 discussing Linda Tripp. So--

4 Q And the Jones lawyers, too. Was that right?

5 A Um, I--I don't know that I discussed the Jones

6 lawyers. If I've testified that I discussed the Jones

7 lawyers, then I did, but--

8 Q Okay. Well, tell us about the notes.

9 A Well, the--sort of the--I don't know what to call

10 it, but the story that I gave to Mr. Jordan was that I was

11 trying to sort of alert to him that, gee, maybe Linda Tripp

12 might be saying these things about me having a relationship

13 with the President, and right now, I'm explaining this to

14 you. These aren't the words that I used or how I said it to

15 him, and that, you know, maybe she had seen drafts of notes,

16 trying to obviously give an excuse as to how Linda Tripp

17 could possibly know about my relationship with the President

18 without me having been the one to have told her. So that's

19 what I said to him.

20 Q And what was his response?

21 A I think it was something like go home and make

22 sure--oh, something about a--I think he asked me if they

23 were notes from the President to me, and I said no. I know

24 I've testified to this. I stand by that testimony, and I'm

25 just recalling it, that I said no, they were draft notes or

1 notes that I sent to the President, and then I believe he
2 said something like, well, go home and make sure they're not
3 there.
4 Q And what did you do when you went home?
5 A I went home and I searched through some of my
6 papers, and--and the drafts of notes I found, I sort of--I
7 got rid of some of the notes that day.
8 Q So you threw them away?
9 A Mm-hmm.
10 THE REPORTER: Is that a "yes"?
11 THE WITNESS: Yes. Sorry.
12 BY MR. BRYANT:
13 Q On your way home, you were with Mr. Jordan? I
14 mean, he carried--did he carry you someplace or take you
15 home, drop you off?
16 A Yes, he dropped me off.
17 Q Okay. On the way home--
18 A It wasn't on the way to my home, but--
19 Q Okay. Did he--did you tell him that you had had
20 an affair with the President?
21 A Yes.
22 Q What was his response?
23 A No response.
24 Q When was the next time--well, let me direct your
25 attention to Monday, January the 5th, 1998. You had an

1 occasion to meet with your lawyer, Mr. Carter, about your
2 case, possible depositions, and so forth.
3 Did you have some concern at that point about
4 those depositions and how you might answer questions in the
5 Paula Jones case?
6 A Yes.
7 Q Did you reach any sort of determination or
8 resolution of those concerns by talking to Mr. Carter?
9 A No.
10 Q What's the status of the affidavit at this point?
11 Is there one?
12 A No.
13 Q Do you recall any other concerns or questions that
14 either you or Mr. Carter may have presented to each other
15 during that meeting?
16 A I think I--I think it was in that meeting I
17 brought up the notion of having my family present, if I had
18 to do a deposition, and he went through what--I believe we
19 discussed--at this point, I think I probably knew at this
20 point I was going to sign an affidavit, but it wasn't
21 created yet, and I believe we discussed what--if the
22 affidavit wasn't, I guess, successful--I don't know how
23 you'd say legally--say that legally--but what a deposition
24 would be like, sitting at a table.
25 Q I'll bet he never told you it would be like this,

1 did he?

2 A No.

3 Q Did you try to contact the President after you

4 left the meeting with Mr. Carter?

5 A Yes.

6 Q And you reached Betty Currie?

7 A Yes.

8 Q And you told her to pass along to the President

9 that you wanted--it was important to talk with him?

10 A Yes.

11 Q You may have mentioned to her something about

12 signing something?

13 A Right; I might have.

14 Q What response did you get from that telephone

15 call?

16 A Uh, Betty called me back, maybe an hour or two

17 later, and put the President through.

18 Q And what was that conversation?

19 A I know I've testified to this, and it was sort of

20 two-fold. On the one hand, I was, uh, upset, so I was sort

21 of in a pissy mood and a little bit contentious. Uh, but

22 more related to the case, uh, I had concerns that from

23 questions Mr. Carter had asked me about how I got my job at

24 the Pentagon and transferred and, and, uh, I was concerned

25 as to how to answer those questions because those questions

1 involved naming other people who I thought didn't like me at
2 the White House, and I was worried that those people might
3 try and--just to get me in trouble because they didn't like
4 me--so that if they were then--I mean, I had no concept of
5 what exactly happens in these legal proceedings, and I
6 thought, well, maybe if I say Joe Schmo helped me get my
7 job, then they'd go interview Joe Schmo, and so, if Joe
8 Schmo said, "No, that's not true," because he didn't like
9 me, then I didn't want to get in trouble. So--
10 Q Did there appear to be a question possibly about
11 how you--how you got the job at the Pentagon? Did you fear
12 for some questions there?
13 A Yes. I think I tend to be sort of a
14 detail-oriented person, and so I think it was, uh, my
15 focusing on the details and thinking everything had to be a
16 very detailed answer and not being able to kind of step back
17 and look at how I could say it more generally. So that's
18 what concerned me.
19 Q Mm-hmm. This--
20 A Because clearly, I mean, I would have had to say,
21 "Gee, I was transferred from the Pentagon because I had this
22 relationship that I'm not telling you about with the
23 President." So there was--there was that concern for me
24 there.
25 Q And what did the President tell you that you could

1 say instead of saying something like that?

2 A That the people in Legislative Affairs helped me

3 get the job--and that was true.

4 Q Okay, but it was also true, to be complete, that

5 they moved you out into the Pentagon because of the

6 relationship with the President?

7 A Right.

8 Q Did--did the subject of the affidavit come up with

9 the President?

10 A Yes, towards the end of the conversation.

11 Q And how did--tell us how that occurred.

12 A I believe I asked him if he wanted to see a copy

13 of it, and he said no.

14 Q Well, I mean, how did you introduce that into the

15 subject--into the conversation?

16 A I don't really remember.

17 Q Did he ask you, well, how's the affidavit coming

18 or--

19 A No, I don't think so.

20 Q But you told him that you had one being prepared,

21 or something?

22 A I think I said--I think I said, you know, I'm

23 going to sign an affidavit, or something like that.

24 Q Did he ask you what are you going to say?

25 A No.

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1 Q And this is the time when he said something about
2 15 other affidavits?
3 A Correct.
4 Q And tell us as best as you can recall what--how
5 that--how that part of the conversation went.
6 A I think that was the--sort of the other half of
7 his sentence as, No, you know, I don't want to see it. I
8 don't need to--or, I've seen 15 others.
9 It was a little flippant.
10 Q In his answer to this proceeding in the Senate, he
11 has indicated that he thought he had--might have had a way
12 that he could have you--get you to file a--basically a true
13 affidavit, but yet still skirt these issues enough that you
14 wouldn't be called as a witness.
15 Did he offer you any of these suggestions at this
16 time?
17 A He didn't discuss the content of my affidavit with
18 me at all, ever.
19 Q But, I mean, he didn't make an offer that, you
20 know, here's what you can do, or let me send you over
21 something that can maybe keep you from committing perjury?
22 A No. We never discussed perjury.
23 Q On--well, how did that conversation end? Did you
24 talk about anything else?
25 A I said goodbye very abruptly.

1 Q The next day--well, on January the 6th--I'm not
2 sure exactly what day we are--1998, did you pick up a draft
3 of the affidavit from Mr. Carter?
4 A Yes, I did.
5 Q What did you do with that draft?
6 A I read it and went through it.
7 Q How did it look?
8 A I don't really remember my reaction to it. I know
9 I had some changes. I know there's a copy of this draft
10 affidavit that's part of the record, but--
11 Q Were portions of it false?
12 A Incomplete and misleading.
13 Q Did you take that affidavit to Mr. Jordan?
14 A I dropped off a copy in his office.
15 Q Did you have any conversation with him at that
16 point or some later point about that affidavit?
17 A Yes, I did.
18 Q And tell us about that.
19 A I had gone through and had, I think, as it's
20 marked--can I maybe see? Isn't there a copy of the draft?
21 [Witness handed document.]
22 [Witness perusing document.]
23 THE WITNESS: Thank you.
24 SENATOR DeWINE: Mr. Bryant, can you reference for
25 the record at this point?

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1 MR. BRYANT: Okay.

2 SENATOR DeWINE: If you can.

3 MR. BRYANT: It would be--

4 MR. SCHIPPERS: 1229.

5 SENATOR DeWINE: 1229?

6 MR. SCHIPPERS: Yes.

7 SENATOR DeWINE: All right. Thank you.

8 BY MR. BRYANT:

9 Q Okay. Have you had an opportunity to review the

10 draft of your affidavit?

11 A I--yes.

12 Q Okay. What--do you have any comment or response?

13 A I received it. I made the suggested changes, and

14 I believe I spoke with Mr. Jordan about the changes I wanted

15 to make.

16 Q Did he have any comment on your proposed changes?

17 A I think he said the part about Lewis & Clark

18 College was irrelevant. I'd have to see the--I don't

19 believe it's in the final copy in the affidavit, so--but I

20 could be mistaken.

21 Q At this point, of course, you had a lawyer, Mr.

22 Carter, who was representing your interest. Mr. Jordan

23 was--I'm not sure if he--how you would characterize him, but

24 would it--would it be that you view Mr. Jordan as, in many

25 ways, Mr.--the President--if Mr. Jordan knew it, the

1 President knew it, or something of that nature?

2 A I think I testified to something similar to that.

3 I felt that, I guess, that Mr. Jordan might have had the

4 President's best interest at heart and my best interest at

5 heart, so that that was sort of maybe a--some sort of a

6 blessing.

7 Q I think, to some extent, what you--what you had

8 said was getting Mr. Jordan's approval was basically the

9 same thing as getting the President's approval. Would you

10 agree with that?

11 A Yeah. I believe that--yes, I believe that's how I

12 testified to it.

13 Q The fact that you assume that Mr. Jordan was in

14 contact with the President--and I believe the evidence would

15 support that through his own testimony that he had talked to

16 the President about the signed affidavit and that he had

17 kept the President updated on the subpoena issue and the job

18 search--

19 A Sir, I'm not sure that I knew he was having

20 contact with the President about this. I--I think what I

21 said was that I felt that it was getting his approval. It

22 didn't necessarily mean that I felt he was going to get a

23 direct approval from the President.

24 I'm sorry to interrupt you.

25 Q Oh, that's fine. At any time you need to clarify

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1 a point, please--please feel free to do so.

2 Did--did--did you have any indication from Mr.

3 Jordan that he--when he discussed the signed affidavit with

4 the President, they were discussing some of the contents of

5 the affidavit? Did you have--

6 A Before I signed it or--

7 Q No; during the drafting stage.

8 A No, absolutely not--either/or. I didn't. No, I

9 did not.

10 Q Now, the changes that you had proposed, did Mr.

11 Jordan agree to those changes?

12 A I believe so.

13 Q And then you somehow reported those changes back

14 to Mr. Carter or to someone else?

15 A No. I believe I spoke with Mr. Carter the next

16 morning, before I went in to see him, and that's when I--I

17 believe that's--I dictated the changes.

18 Q Okay. Mr. Jordan did not relay the changes to Mr.

19 Carter--you did?

20 A I know I relayed the changes, these changes to Mr.

21 Carter.

22 Q Specifically, the concerns that you had

23 about--about the draft, what did they include, the changes?

24 A I think one of the--I think what concerned me--and

25 I believe I've testified to this--was--was in Number 6.

1 Even just mentioning that I might have been alone with the
2 President, I was concerned that that would give the Jones
3 people enough ammunition to want to talk to me, to think,
4 oh, well, maybe if she was alone with him that--that he
5 propositioned me or something like that, because I
6 hadn't--of course, I mean, you remember that at this point,
7 I had no idea the amount of knowledge they had about the
8 relationship. So--
9 Q Did--Mr. Carter, I assume, made those changes, and
10 then you subsequently signed the affidavit?
11 A We worked on it in his office, and then, yes, I
12 signed the affidavit.
13 Q Is this the same day--
14 A Yes.
15 Q --at this point?
16 A This was the 7th?
17 Q Yes.
18 A Correct.
19 Q Did--did you take the signed--or a copy of the
20 signed affidavit, I should say--did you take a copy--did you
21 keep a copy?
22 A Yes, I did.
23 Q Did you give it to anyone or give anyone else a
24 copy?
25 A No.

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1 Q Now, did you, the next day on the 8th, go to New
2 York for some interviews for jobs?
3 A It was--it--I either went later on the 7th or on
4 the 8th, but around that time, yes.
5 Q Was this a place that you had already interviewed?
6 A Yes.
7 Q And I assume this was at McAndrews and Forbes?
8 A Yes.
9 Q How did you feel that the interview went?
10 A I--I know I characterized it in my grand jury
11 testimony as having not gone very well.
12 Q Okay. I think you also mentioned it went very
13 poorly, too. Does that sound--does that ring a bell?
14 A Sure.
15 Q Why? Why would you so characterize it?
16 A Well, as I've had a lot of people tell me, I'm a
17 pessimist, but also I--I wasn't prepared. I was in a
18 waiting room downstairs at McAndrews and Forbes, and--or at
19 least, I thought it was a waiting room--and Mr. Durnan
20 walked into the room unannounced, and the interview began.
21 So I felt that I started on the wrong foot, and I just
22 didn't feel that I was as articulate as I could have been.
23 Q Did you call Mr. Jordan after that?
24 A Yes, I did.
25 Q Did you express those same concerns?

1 A Yes, I did.
2 Q What did he say?
3 A And this is a little fuzzy for me. I know that I
4 had a few phone calls with him in that day. I think in this
5 call, he said, you know, "Don't worry about it." I--my
6 testimony is probably more complete on this. I'm sorry.
7 Q What--what other phone calls did you have with him
8 that day?
9 A I remember talking to--I know that at some point,
10 he said something about that he'd call the chairman, and
11 then I think he said just at some point not to worry. He
12 was always telling me not to worry because I always--I
13 overreact a little bit.
14 Q All total, how many calls did you have with him
15 that day--your best guess?
16 A I have no idea.
17 Q More than two?
18 A I--I don't know.
19 Q Can you think of any other subjects the two of you
20 would have talked about?
21 A I don't think so.
22 Q Did he, Mr. Jordan, tell you that he had talked to
23 the chairman, or Mr. Perelman, whatever his title is?
24 A I'm sorry. I know I've testified to this. I
25 don't--I think so.

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1 Q And you had--did you have additional interviews at
2 this company or a subsidiary?
3 A Yes, I--well, I had with the sort of, I guess,
4 daughter--daughter company, Revlon. I had an interview with
5 Revlon the next day.
6 Q And you were offered a job?
7 A Yes, I was.
8 Q About the 9th or so? That would have been 2 days
9 after the affidavit?
10 A Oh. Actually, no. I think I was offered a
11 position, whatever that Friday was. Oh, yes, the 9th. I'm
12 sorry. You're right.
13 Oh, wait. It was either the 9th or the 13th--or
14 the 12th--the 9th or the 12th.
15 Q Okay. Now, I'm--I was looking away. I'm
16 confused.
17 A That's okay. I--my interview was on the 9th, and
18 I don't remember right now--I know I've testified to
19 this--whether I found out that afternoon or it was on Monday
20 that I got the informal offer.
21 Q Mm-hmm.
22 A So, if you want to tell me what I said in my grand
23 jury testimony, I'll be happy to affirm that.
24 Q I think we may be talking about perhaps an
25 informal offer. Does that--on the 9th?

1 A Yes. I know it was--okay. Was it on the--I
2 don't--
3 Q Yes.
4 A --remember if it was the 9th or the 13th--
5 A Okay.
6 Q --but I know Ms. Sideman called me to extend an
7 informal offer, and I accepted.
8 Q Okay. Now, in regard to the affidavit--do you
9 still have your draft in front of you?
10 A Yes, sir.
11 Q In paragraph number 3, you say: "I can not fathom
12 any reason--fathom any reason why--that the plaintiff would
13 seek information from me for her case."
14 A Yes, sir.
15 Q Did Mr. Carter at all go into the gist of the
16 Paula Jones lawsuit, the sexual harassment part of it, and
17 tell you what it was about?
18 A I think I knew what it was about.
19 Q All right. And then you indicated that you didn't
20 like the part about the doors, being behind closed doors,
21 but on the sexual relationship, paragraph 8, the first
22 sentence, "I've never had a sexual relationship with the
23 President"--
24 A Mm-hmm.
25 Q --that's not true, is it?

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1 A No. I haven't had intercourse with the President,
2 but--
3 Q Was that the distinction you made when you signed
4 that affidavit, in your own mind?
5 A That was the justification I made to myself, yes.
6 Q Let me send you the final affidavit. It might be
7 a little easier to work from--
8 A Okay.
9 Q --than the--than the original.
10 MR. BRYANT: Do we have all the--1235.
11 [Witness handed document.]
12 SENATOR DeWINE: Congressman?
13 MR. BRYANT: Yes.
14 SENATOR DeWINE: We're down to 3 minutes on the
15 tape. Would now be a good time to have him switch tapes and
16 then we'll go right back in?
17 MR. BRYANT: Okay, that would be fine.
18 SENATOR DeWINE: I think we'll hold right at the
19 table, and we'll get the tapes switched.
20 THE VIDEOGRAPHER: Okay, we will do that now.
21 This marks the end of Videotape Number 2 in the
22 deposition of Monica S. Lewinsky.
23 We are going off the record at 14:31 hours.
24 [Recess.]
25 THE VIDEOGRAPHER: This marks the beginning of

1 Videotape Number 3 in the deposition of Monica S. Lewinsky.
2 The time is 14:44 hours.
3 SENATOR DeWINE: We are back on the record.
4 Let me advise counsel that you have used 3 hours
5 and 2 minutes.
6 Congressman Bryant, you may continue.
7 MR. BRYANT: Thank you, sir.
8 BY MR. BRYANT:
9 Q Ms. Lewinsky, let me just follow up on some points
10 here, and then I'll move toward the conclusion of my direct
11 examination very, very quickly, I hope.
12 In regard to the affidavit--I think you still have
13 it in front of you--the final copy of the affidavit--I
14 wanted to revisit your answer about paragraph 8--
15 A Yes, sir.
16 Q --and also refer you to your grand jury testimony
17 of August the 6th. This begins on--actually, it is on page
18 1013 of the--it should be the Senate record, in the
19 appendices, but it's your August 6th, 1998, grand jury
20 testimony.
21 And it's similar to the--my question about
22 paragraph 8 about the sexual relationship--and I notice
23 you--you now carve out an exception to that by saying you
24 didn't have intercourse, but I would direct your attention
25 to a previous answer and ask if you can recall being asked

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1 this question in your grand jury testimony and ask--giving
2 the answer--the question is: "All right. Let me ask you a
3 straightforward question. Paragraph 8, at the start, says,
4 quote, 'I have never had a sexual relationship with the
5 President,' unquote. Is that true?," and your answer is,
6 "No."
7 Now, do you have any comment about why your answer
8 still would not be no, that that is not a true statement in
9 paragraph 8?
10 A I think I was asked a different question.
11 Q Okay.
12 A My recollection, sir, was that you asked me if
13 that was a lie, if paragraph 8 was--I--I'm not trying to--
14 Q Okay. Well, if--if I ask you today the same
15 question that was asked in your grand jury, is your
16 statement, quote, "I have never had a sexual relationship
17 with the President," unquote, is that a true statement?
18 A No.
19 Q Okay, that's good.
20 Now, also in paragraph 8, you mention that there
21 were occasions after you left--I think it looks like
22 the--the last sentence in paragraph 8, "The occasions that I
23 saw the President after I left my employment at the White
24 House in April 1996 were official receptions, formal
25 functions, or events related to the United States Department

1 of Defense, where I was working at the time," period--
2 actually the last sentence, "There were other people present
3 on those occasions." Now, that also is not a truthful
4 statement; is that correct?
5 A It--I think I testified that this was misleading.
6 It's incomplete--
7 Q Okay. It's not a truthful statement?
8 A --and therefore, misleading.
9 Well, it--it is true; it's not complete.
10 Q Okay. All right. Now, I will accept that.
11 A Okay. Thank you.
12 Q Thank you.
13 Going back to the gift retrieval of December the
14 28th, I want to be clear that we're on the same sheet of
15 music on this one. As I understand, there's no doubt in
16 your mind that Betty Currie called you, initiated the call
17 to you to pick up the gifts? She--
18 A That's how I remember this event.
19 Q And you went through that process, and at the very
20 end, you were sitting out in the car with her, with a box of
21 gifts, and it was only at that time that you asked her to
22 keep these gifts for you?
23 A I don't think I said "gifts." I don't--
24 Q Or keep this package?
25 A I think I said--gosh, was it in the car that I

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1 said that or on the phone? I think it was in the car.
2 I--I'm--I don't know if that makes a difference.
3 Q But this was at the end of a process that Betty
4 Currie had initiated by telephone earlier that day to come
5 pick up something that you have for her?
6 A Yes.
7 Q Okay. Now, were you ever under the impression
8 from anything that the President said that you should turn
9 over all the gifts to the Jones lawyers?
10 A No, but where this is a little tricky--and I think
11 I might have even mentioned this last weekend--was that I
12 had an occasion in an interview with one of the--with the
13 OIC--where I was asked a series of statements, if the
14 President had made those, and there was one statement that
15 Agent Phalen said to me--I--there were--other people, they
16 asked me these statements--this is after the President
17 testified and they asked me some statements, did you say
18 this, did you say this, and I said, no, no, no. And Agent
19 Phalen said something, and I think it was, "Well, you have
20 to turn over whatever you have." And I said to you, "You
21 know, that sounds a little bit familiar to me."
22 So that's what I can tell you on that.
23 Q That's in the 302 exam?
24 A I don't know if it's in the 302 or not, but that's
25 what happened.

1 Q Uh-huh.

2 A Or, that's how I remember what happened.

3 Q Okay. And your response to the question in the

4 deposition that I just asked you--were you ever under the

5 impression from anything the President said that you should

6 have--that you should turn over all the gifts to the Jones

7 lawyers--your answer in that deposition was no.

8 A And which date was that, please?

9 Q The deposition was August the 26th.

10 A Oh, the 26th.

11 Q Yes.

12 A It might have been after that, or maybe it was--I

13 don't--

14 Q Okay. I wanted to ask you, too, about a couple of

15 other things in terms of your testimony. Regarding the

16 affidavit--and this appears to be, again, grand jury

17 testimony--

18 A Sir, do you have a copy that I could look at if

19 you're going to--

20 Q Sure. August, the August 6th--233--it's the--it's

21 this page here.

22 While we're looking at that, let me ask you a

23 couple other things here. I wanted to ask you--I talked to

24 you a little bit about the President today and your feelings

25 today that persist that you think he's a good President, and

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1 I assume you think he's a very intelligent man?

2 A I think he's an intelligent President.

3 [Laughter.]

4 MR. BRYANT: Okay. Thank goodness, this is

5 confidential; otherwise, that might be the quote of the day.

6 I know we won't see that in the paper, will we?

7 BY MR. BRYANT:

8 Q Referring to January the 18th, 1998, the President

9 had a conversation with Betty Currie, and he made five

10 statements to her. One was that "I was never really alone

11 with Monica; right?" That's one. That's not true, is it,

12 that "I was never alone with"--

13 A Sir, I was not present for that conversation. I

14 don't feel comfortable--

15 Q Let me ask you, though--I realize none of us were

16 there--but that statement, "I was never really alone with

17 Monica; right?"--that was not--he was alone with you on many

18 occasions, was he not?

19 A I--I'm not trying to be difficult, but I feel very

20 uncomfortable making judgments on what someone else's

21 statement when they're defining things however they want to

22 define it. So if you--if you ask me, Monica, were you alone

23 with the President, I will say yes, but I'm not comfortable

24 characterizing what someone else says--

25 Q Okay.

1 A --passing judgment on it. I'm sorry.
2 Q Were you--was Betty Currie always with you when
3 the President was with you?
4 A Betty Currie was always at the White House when I
5 went to see the President at the White House after I left
6 working at the White House.
7 Q But was--at all times when you were alone with the
8 President, was Betty Currie always there with you?
9 A Not there in the room.
10 Q Okay. Did--did--did you come on to the President,
11 and did he never touch you physically?
12 A I guess those are two separate questions, right?
13 Q Yes, they are.
14 A Did I come on to him? Maybe on some occasions.
15 Q Okay.
16 A Not initially.
17 Q Okay. Not initially.
18 A I--
19 Q Did he ever--did he ever touch you?
20 A Yes.
21 Q Okay. Could Betty Currie see and hear everything
22 that went on between the two of you all the time?
23 A I can't answer that. I'm sorry.
24 Q As far as you know, could she see and hear
25 everything that went on between the two of you?

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1 A Well, if I was in the room, I couldn't--I--I
2 couldn't be in the room and being able to see if Betty
3 Currie could see and hear what was--
4 Q I think I--
5 MR. STEIN: Wouldn't it be a little speedier--if I
6 may make this observation, you have her testimony; you have
7 the evidence of--
8 SENATOR DeWINE: Counsel, is this an objection?
9 MR. STEIN: I just would ask him to draw whatever
10 inferences there were to speed this up.
11 SENATOR DeWINE: I'll ask him to rephrase the
12 question.
13 MR. BRYANT: I would just stop at that point. I
14 think, uh, that's enough of that.
15 BY MR. BRYANT:
16 Q The President also had conversations with Mr.
17 Blumenthal on January the 21st, 1998, and indicated that you
18 came on to the President and made a sexual demand. At the
19 initial part of this, did you come on to the President and
20 make a sexual demand on the President?
21 A No.
22 Q At the initial meeting on November the 15th, 1995,
23 did he ever rebuff you from these advances, or from any kind
24 of--
25 A On November 15th?

1 Q November 15th. Did he rebuff you?
2 A No.
3 Q Did you threaten him on November 15th, 1995?
4 A No.
5 Q On January 23rd, 1998, the President told John
6 Podesta that--many things. I'll--I'll withdraw that. Let
7 me go--kind of wind this down. I'd like to save some time
8 for redirect.
9 You've indicated that with regard to the affidavit
10 and telling the truth, there is some testimony I'd like to
11 read you from your deposition that we started out--August
12 the 6th--I'm sorry--the grand jury, August 6th, 1998--
13 MS. MILLS: What internal page number?
14 MR. SCHIPPERS: 1021 internal, 233.
15 MR. BRYANT: Okay, we need to get her a copy.
16 MR. SCHIPPERS: Do you have the August 6th still
17 over there?
18 THE WITNESS: I can share with Sydney--if you
19 don't mind.
20 [Witness perusing document.]
21 BY MR. BRYANT:
22 Q Beginning--do you have page 233--
23 A Uh-huh.
24 Q --okay--beginning at line 6--
25 A Okay.

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1 Q --it reads--would you prefer to read that? Why
2 don't you read--
3 A Out loud?
4 Q Would you read it out loud?
5 A Okay.
6 Q Through line 16--6 through 16. This is your
7 answer.
8 A "Sure. Gosh. I think to me that if--if the
9 President had not said the Betty and letters cover, let's
10 just say, if we refer to that, which I'm talking about in
11 paragraph 4, page 4, I would have known to use that. So to
12 me, encouraging or asking me to lie would have--you know, if
13 the President had said, Now, listen, you'd better not say
14 anything about this relationship, you'd better not tell them
15 the truth, you'd better not--for me, the best way to explain
16 how I feel what happened was, you know, no one asked or
17 encouraged me to lie, but no one discouraged me, either."
18 Q Okay. That--that statement, is that consistent in
19 your view with what you've testified to today?
20 A Yes.
21 Q Okay. Look at page 234, which is right below
22 there.
23 A Okay. [Perusing document.]
24 Q Beginning with the--your answer on line 4, and
25 read down, if you could, to line 14--4 through 14.

1 A "Yes and no. I mean, I think I also said that
2 Monday that it wasn't as if the President called me and
3 said, You know, Monica, you're on the witness list. This is
4 going to be really hard for us. We're going to have to tell
5 the truth and be humiliated in front of the entire world
6 about what we've done, which I would have fought him on,
7 probably. That was different. And by him not calling me
8 and saying that, you know, I knew what that meant. So I, I
9 don't see any disconnect between paragraph 10 and paragraph
10 4 on the page. Does that answer your question?"
11 Q Okay. Now, has that--has your testimony today
12 been consistent with that provision?
13 A I--I think so.
14 Q Okay.
15 A I've intended for my testimony to be consistent
16 with my grand jury testimony.
17 Q Okay. And one final read just below that, line
18 16 through 24.
19 A "Did you understand all along that he would deny
20 the relationship also?"
21 "Mm-hmm, yes."
22 Q And 19 through 24--the rest of that.
23 A Oh, sorry.
24 "And when you say you understood what it meant
25 when he didn't say, Oh, you know you must tell the truth,

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1 what did you understand that to mean?"

2 "That, that, as we had on every other occasion and

3 in every other instance of this relationship, we would deny

4 it."

5 MR. BRYANT: Okay.

6 Could we have just--go off the record here a

7 minute?

8 SENATOR DeWINE: Sure. Let's go off the record at

9 this point.

10 THE VIDEOGRAPHER: We're going off the record at

11 1459 hours.

12 [Recess.]

13 THE VIDEOGRAPHER: We're going back on the record

14 at 1504 hours.

15 SENATOR DeWINE: Manager Bryant, you may proceed.

16 MR. BRYANT: Thank you, Senator.

17 BY MR. BRYANT:

18 Q Ms. Lewinsky, I have just a few more questions

19 here.

20 With regard to the false affidavit, you do admit

21 that you filed an untruthful affidavit with the court in the

22 Jones case; is that correct?

23 A I think I--I--yes--I mean, it was incomplete and

24 misleading, and--

25 Q Okay. With regard to the cover stories, on

1 December the 6th, you and the President went over cover
2 stories, and in the same conversation he encouraged you to
3 file an affidavit in the Jones case; is that correct?
4 A No.
5 MS. SELIGMAN: I think that misstates the record.
6 BY MR. BRYANT:
7 Q All right. On December the 17th. Let's try
8 December 17; all right?
9 A Okay.
10 Q You and the President went over cover stories--
11 that's the telephone conversation--
12 A Okay--I'm sorry--can you repeat the question?
13 Q Okay. On December 17th, you and the President
14 went over cover stories in a telephone conversation.
15 A Correct.
16 Q And in that same telephone conversation, he
17 encouraged you to file an affidavit in the Jones case?
18 A He suggested I could file an affidavit.
19 Q Okay. With regard to the job, between your
20 meeting with Mr. Jordan in early November and December the
21 5th when you met with Mr. Jordan again, you did not feel
22 that Mr. Jordan was doing much to help you get a job; is
23 that correct?
24 MS. SELIGMAN: Objection. Misstates the record.
25 BY MR. BRYANT:

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1 Q Okay. You can answer that.
2 A It--
3 Q Let me repeat it. Between your meeting with Mr.
4 Jordan in early November and December the 5th when you met
5 with Mr. Jordan again, you did not feel that Mr. Jordan was
6 doing much to help you get a job; is that correct?
7 MS. SELIGMAN: Same objection.
8 THE WITNESS: Do you mean when I met with him
9 again on December 11th? I don't--
10 MR. BRYANT: The--
11 THE WITNESS: --I didn't meet with Mr. Jordan on
12 December 5th. I'm sorry--
13 MR. BRYANT: Okay.
14 THE WITNESS: --am I misunderstanding something?
15 MR. BRYANT: We're getting our numbers wrong here.
16 THE WITNESS: Okay.
17 BY MR. BRYANT:
18 Q Between your meeting with Mr. Jordan in early
19 November and December the 11th when you met with Mr. Jordan
20 again, you did not feel that Mr. Jordan was doing much to
21 help you get a job; is that correct?
22 A I hadn't seen any progress.
23 Q Okay. After you met with Mr. Jordan in early
24 December, you began to interview in New York and were much
25 more active in your job search; correct?

1 A Yes.
2 Q In early January, you received a job offer from
3 Revlon with the help of Vernon Jordan; is that correct?
4 A Yes.
5 Q Okay. With regard to gifts, regarding the gifts
6 that were subpoenaed in the Jones case, you are certain that
7 Ms. Currie called you and that she understood you had
8 something to give her; is that correct?
9 A That's my recollection.
10 Q You never told Ms. Currie to come pick up the
11 gifts or that Michael Isikoff had called about them; is that
12 correct?
13 A I don't recall that.
14 Q Regarding stalking, you never stalked the
15 President; is that correct?
16 A I--I don't believe so.
17 Q Okay. You and the President had an emotional
18 relationship as well as a physical one; is that right?
19 A That's how I'd characterize it.
20 Q Okay. He never rebuffed you?
21 A I--I think that gets into some of the intimate
22 details of--no, then, that's not true. There were occasions
23 when he did.
24 Q Uh-huh. Okay. But he never rebuffed you
25 initially on that first day, November the 15th, 1995?

173

1 A No, sir.

2 MR. BRYANT: With that question, I would like to

3 close my direct examination and reserve the balance of time.

4 SENATOR EDWARDS: May I ask a question?

5 SENATOR DeWINE: We are now at 3 minutes and 20

6 seconds--I'm sorry--3 hours and 20--you would have 40

7 minutes reserved.

8 SENATOR EDWARDS: Does that complete the direct

9 examination?

10 MR. BRYANT: That completes your direct.

11 SENATOR EDWARDS: That was my question.

12 THE WITNESS: Do you want these back?

13 [Witness handing documents.]

14 SENATOR DeWINE: We will now turn to White House

15 Counsel.

16 MS. SELIGMAN: We have no questions of the

17 witness.

18 Ms. Lewinsky, on behalf of the President, we'd

19 like to tell you how very sorry we all are for what you have

20 had to go through.

21 THE WITNESS: Thank you.

22 SENATOR DeWINE: All right. Ms. Lewinsky, thank

23 you very much.

24 This concludes the deposition.

25 MR. CACHERIS: May the witness be excused?

1 SENATOR DeWINE: The witness is excused.

2 [Witness excused.]

3 THE VIDEOGRAPHER: This does conclude the

4 deposition of Monica S. Lewinsky.

5 We are going off the record at 1509 hours--

6 SENATOR DeWINE: Let me, before we go off the

7 record--Ms. Lewinsky is done with the testimony, but let me

8 just read for the record and for everyone who is in the

9 room--and we do have a number of people in the room--Section

10 205 that I noted earlier, which reads: "All present must

11 maintain the confidentiality of the proceedings," end of

12 quote.

13 For Senators and Senate employees, they should be

14 aware that this deposition is a, quote, "confidential

15 proceeding of the Senate under Senate Rule 29.5." This

16 deposition may be discussed only with Members of the Senate

17 and staff designated by Members of the Senate.

18 House Managers and House employees may only

19 discuss this deposition with fellow Managers and staff

20 designated by the Managers.

21 The President's counsel may only discuss this

22 deposition with the President and counsel and staff

23 representing the President in this matter.

24 Ms. Lewinsky and her counsel may only discuss this

25 deposition with each other.

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1 This injunction remains in effect unless ordered
2 otherwise by the United States Senate. Moreover, any record
3 of this deposition made available must similarly be kept
4 confidential until further order of the United States
5 Senate.
6 All persons are admonished to conduct themselves
7 accordingly.
8 Ms. Lewinsky, again, thank you very much.
9 MR. BRYANT: Mr. Chairman?
10 SENATOR DeWINE: Mr. Bryant?
11 MR. BRYANT: It may be a technical point, and I
12 want to be clear. Mr. Cacheris has asked that his witness
13 be excused, and I'm thinking there is that slight
14 possibility that she could be called, and we ought to make
15 sure that she stays on call.
16 SENATOR DeWINE: The witness is excused from this
17 particular deposition.
18 MR. ROGAN: Senator, may we have you state for the
19 record that the witness is to remain on call to the United
20 States Senate in the event that becomes necessary in later
21 proceedings?
22 SENATOR DeWINE: We'll go off the record for the
23 moment.
24 THE VIDEOGRAPHER: We're going off the record at
25 1511 hours.

1 [Discussion off the record.]

2 THE VIDEOGRAPHER: We're going back on the record

3 at 1512 hours.

4 SENATOR DeWINE: I want to make it clear to

5 everyone that it would take a separate subpoena for Ms.

6 Lewinsky to appear again. And when I stated that this

7 concludes this deposition, that's what I meant--this

8 concludes this particular deposition.

9 Again, Ms. Lewinsky, thank you very much.

10 THE VIDEOGRAPHER: This does now conclude this

11 deposition. We're going off the record at 1512 hours.

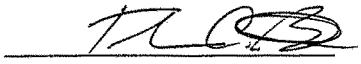
12 The total number of tapes used is three.

13 [Whereupon, at 3:12 p.m., the deposition was

14 concluded.]

CERTIFICATE

I, **THOMAS C. BITSKO,** the Official Court Reporter for Miller Reporting Company, Inc., hereby certify that I recorded the foregoing proceedings; that the proceedings have been reduced to typewriting by me, or under my direction and that the foregoing transcript is a correct and accurate record of the proceedings to the best of my knowledge, ability and belief.



THOMAS C. BITSKO

CERTIFICATE

I, **CATHY JARDIM,** the Official Court Reporter for Miller Reporting Company, Inc., hereby certify that I recorded the foregoing proceedings; that the proceedings have been reduced to typewriting by me, or under my direction and that the foregoing transcript is a correct and accurate record of the proceedings to the best of my knowledge, ability and belief.

Cathy Jardim

CATHY JARDIM

MANAGER'S EXHIBITS

EXHIBIT #	DESCRIPTION	WITNESS
ML-1	Monica Lewinsky Proffer (10 pp.)	Lewinsky
ML-2	Chart of Lewinsky contacts with the President (11 pp.)	Lewinsky
ML-3	7/27/98 "302" (16 pp.)	Lewinsky
ML-4	7/29/98 "302" (18 pp.)	Lewinsky
ML-5	7/30/98 "302" (21 pp.)	Lewinsky
ML-6	7/31/98 "302" (17 pp.)	Lewinsky
ML-7	8/1/98 "302" (14 pp.)	Lewinsky
ML-8	8/2/98 "302" (11 pp.)	Lewinsky
ML-9	8/3/98 "302" (11 pp.)	Lewinsky
ML-10	8/4/98 "302" (8 pp.)	Lewinsky
ML-11	8/11/98 "302" (9 pp.)	Lewinsky
ML-12	8/13/98 "302" (9 pp.)	Lewinsky
ML-13	8/19/98 "302" (5 pp.)	Lewinsky
ML-14	8/24/98 "302" (9 pp.)	Lewinsky
ML-15	9/3/98 "302" and attachments (6 pp.)	Lewinsky
ML-16	9/5/98 "302" and attachments (4 pp.)	Lewinsky
ML-17	9/6/98 "302" and attachments (5 pp.)	Lewinsky
ML-18	8/6/98 Grand Jury Transcript (58 pp.)	Lewinsky
ML-19	8/20/98 Grand Jury Transcript (27 pp.)	Lewinsky

(1) White House
EXHIBIT NO. 1
2-4-99
C. JARDIN

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EXHIBIT #	DESCRIPTION	WITNESS
ML-20	8/26/98 Deposition Transcript (13 pp.)	Lewinsky
ML-21	8/26/98 "302" and attachments (4 pp.)	Lewinsky
ML-22	Draft Affidavit (3 pp.)	Lewinsky
ML-23	Final Affidavit (3 pp.)	Lewinsky
ML-24	Draft Letter to President Clinton (1 pg.)	Lewinsky
ML-25	Draft Letter to President Clinton (1 pg.)	Lewinsky
ML-26	Draft Letter to President Clinton (1 pg.)	Lewinsky
ML-27	Draft Letter to President Clinton (1 pg.)	Lewinsky
ML-28	Draft Letter to President Clinton (1 pg.)	Lewinsky
ML-29	Draft Letter to President Clinton (1 pg.)	Lewinsky
ML-30	11/2/97 Letter to Betty Currie (1 pg.)	Lewinsky
ML-31	Boss Day Note to President Clinton (3 pp.)	Lewinsky
ML-32	Handwritten note (2 pp.)	Lewinsky
ML-33	Birthday invitation (2 pp.)	Lewinsky
ML-34	Note to Dale Young (2 pp.)	Lewinsky
ML-35	3/2/97 Handwritten note to President Clinton (2 pp.)	Lewinsky
ML-36	9/30/97 Letter to President Clinton (1 pg.)	Lewinsky
ML-37	October, 1997 Calendar (1 pg.)	Lewinsky

EXHIBIT #	DESCRIPTION	WITNESS
ML-38	November, 1997 Calendar (1 pg.)	Lewinsky
ML-39	Draft Letter to President Clinton (1 pg.)	Lewinsky
ML-40	Draft Letter to M. Scott (2 pp.)	Lewinsky
ML-41	7/6/97 Letter to M. Scott (1 pg.)	Lewinsky
ML-42	April, 1997 Diary page	Lewinsky
ML-43	6/29/98 Note to President Clinton (1 pg.)	Lewinsky
ML-44	1/13/98 Letter to Jenna Sheldon (1 pg.)	Lewinsky
ML-45	12/11/97 Letter to Halperin with cc: to Mr. Jordan (1 pg.)	Lewinsky
ML-46	Monica Lewinsky Resume (1 pg.)	Lewinsky
ML-47	11/3/97 Letter to Mr. Richardson (1 pg.)	Lewinsky
ML-48	6/24/97 Letter to Ms. Currie (1 pg)	Lewinsky
ML-49	11/7/97 Letter to Mr. Jordan (1 pg.)	Lewinsky
ML-50	12/11/97 Letter to Ms. Fairbarn (1 pg.)	Lewinsky
ML-51	Draft Letter to President Clinton (1 pg.)	Lewinsky
ML-52	11/2/97 Letter to President Clinton (1 pg.)	Lewinsky
ML-53	Jobs Wish List	Lewinsky
ML-54	Recorded Lewinsky visits to White House (Chart)(8 pp.)	Lewinsky
ML-55	Talking Points (3 pp.)	Lewinsky

EXHIBIT #	DESCRIPTION	WITNESS
ML-56	Betty Currie Cell Phone Record (1 pg.)	Lewinsky
ML-57	12/6/97 Telephone Record	Lewinsky
ML-58	8/17/98 Transcript of Grand Jury Testimony of President Clinton	Lewinsky
ML-59	Portion of Testimony from Grand Jury Appearance of Betty Currie on 5/14/98, p. 146	Lewinsky
ML-60	Chart used by White House Counsel Cheryl Mills (1 pg.)	Lewinsky
ML-61	Portion of statement of Richard Davis cited by White House Counsel Gregory Craig (Congressional Record 1/20/98, p. S. 818.)	Lewinsky
ML-62	Definition of "Sexual Relations" used in 1/17/98 Deposition	Lewinsky
ML-63	Map of Oval Office area with attachment (2 pp.)	Lewinsky
ML-64	Testimony of Sidney Blumenthal 6/4/98 Grand Jury (2 pp.)	Lewinsky
ML-65	Portion of testimony from Deposition of Ms. Lewinsky (p. 28, l. 18-25; p. 29, l. 1-25; p. 30, l. 1-24; p. 48, l. 21-25; p. 49, l. 1-14; p. 6, l. 22-25; p. 7, l. 1-24)	Lewinsky
ML-66	Portion of testimony from Grand Jury Appearance of Ms. Lewinsky on 8/20/98, p. 31, l. 22-25; p. 32, l. 1)	Lewinsky

CALLS FOR 202 4562990

DNIS #			CARRIER	TERM #		CONNECT	MIN	SEC	DATE
202	342	3849		202	456	2990	00:55	0	971205
202	342	3849		202	456	2990	00:55	1	971205
202	342	3849		202	456	2990	00:55	0

Name	Phone Numbers
Currie, Betty	2023951831 2024562990 2024566703 7032431453

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EXHIBIT 59

Multi-Page™ Thursday, May 14, 1998

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Page 146

1 identifying her. How would you characterize her, please?
2 THE WITNESS: Initially, I would consider her as an
3 intern who had been maligned improperly. Later on, I
4 considered her as a pain in the neck, more or less.
5 MR. BITTMAN: Or lower, I think you said.
6 THE WITNESS: Well, yes, sir.
7 A JUROR: This is the third question. Do you know
8 of anyone who ever received, in your lifetime, the number of
9 favorable supports in seeking employment through people like
10 Vernon Jordan, the President, several other people in the
11 White House and yourself included, as one of those important
12 people?
13 THE WITNESS: In my lifetime?
14 A JUROR: Yes, ma'am.
15 THE WITNESS: That's a long time. Let me think.
16 I have heard people tell me that when – they say
17 that you've approached Vernon for a job. I say, "Yes." They
18 say, "Do you know," the list goes on and on, the people who
19 have approached Vernon for a job.
20 The fact that Monica did was just minor.
21 Favorable? I've tried to help many people with
22 jobs. I don't know how far you think I've gone to help them.
23 I haven't had the President's backing on it, so I couldn't go
24 as far as I would like to.
25 BY MR. EMMICK:

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eling?

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1 Q I think his question is more the number and the
2 high level of the people. That is to say, the President

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MS. CURRIE'S TESTIMONY REGARDING WHO INITIATED THE GIFT RETRIEVAL

- "Lewinsky called Currie and advised she had to return all gifts Clinton had given Lewinsky as there was talk going around about the gifts." *(Currie 1/24/98 FBI Interview).*

- "Monica said she was getting concerned, and she wanted to give me the stuff the President had given her — or give me a box of stuff. It was a box of stuff." *(Currie 1/27/98 GJ Testimony).*

- "Q: . . . Just tell us for a moment how this issue first arose and what you did about it and what Ms. Lewinsky told you.

  A: The best I remember it first arose with conversation. I don't know if it was over the telephone or in person. I don't know. She asked me if I would pick up a box. She said Isikoff had been inquiring about gifts." *(Currie 5/6/98 GJ Testimony).*

- "The best I remember she said that she wanted me to hold these gifts — hold this — she may have said gifts, I'm sure she said gifts, box of gifts — I don't remember — because people were asking questions. And I said, 'Fine.'" *(Currie 5/6/98 GJ Testimony).*

- "The best I remember is Monica calls me and asks me if she can give me some gifts, if I'd pick up some gifts for her." *(Currie 7/22/98 GJ Testimony).*

EXHIBIT ML-60

EXHIBIT 65

28

1 him that -- I asked him if we could sort of bump into the
2 hallway, bump into each other in the hallway on purpose this
3 time, because when it happened accidentally, that seemed to
4 work really well and I felt more comfortable doing that. So,
5 that's what we did. We both said, okay, I'm going to leave
6 now.
7 And indeed we bumped into each other in the hall
8 and went through the Rose Garden into the Oval Office. And I
9 think we went right into the back office. The -- when we got
10 there.
11 Q When you say the back office, you mean the study?
12 A Yes. And -- let's see.
13 You know, I need to take a break.
14 Q Okay. Let's take a break.
15 (Whereupon, the deposition was recessed from 1:10 p.m.
16 until 1:15 p.m.)
17 BY MS. IMMERGUT:
18 Q Ms. Lewinsky, you are still under oath.
19 A Yes.
20 Q We are still on February 4th, 1996. You've
21 described going into the office and starting to kiss the
22 President. What happened then?
23 A We were in the back office and we were kissing, a
24 I was -- I had a dress on that buttoned all the way, all th
25 way up and down.

2

1 Q To the neck?

2 A Correct. It was long and down to the, to my

3 ankles, or whatever. And he unbuttoned my dress and he

4 unhooked my bra, and sort of took the dress off of my

5 shoulders and took the bra off of my, off of my -- I'm not

6 explaining this right. So that he moved the bra so that my

7 bra was kind of hanging on one shoulder and so was off. And

8 he just was, he was looking at me and touching me and telli

9 me how beautiful I was.

10 Q And did he touch your breasts with his hands?

11 A Yes.

12 Q Did he also touch them with his mouth?

13 A Yes.

14 Q And at that point, that is directly on your skin,

15 is that right?

16 A Yes.

17 Q Did he touch your genitals?

18 A Yes, he did.

19 Q Did he bring you to orgasm on that date?

20 A Yes, he did.

21 Q [redacted]

22 [redacted]

23 A [redacted]

24 Q [redacted]

25 [redacted]

1310

30

1 [redacted]

2 A [redacted]

3 [redacted]

4 [redacted]

5 [redacted]

6 [redacted]

7 Q [redacted]

8 [redacted]

9 A [redacted]

10 Q [redacted]

11 [redacted]

12 A [redacted]

13 Q And again, just with respect to bringing you to an

14 orgasm, did he touch you directly on your skin on your

15 genitals, or was it through underwear?

16 A First it was through underwear and then it was

17 directly touching my genitals.

18 Q Did he take your underwear off, or did you take

19 your underwear off?

20 A Hmm.

21 Q Or did they stay on?

22 A I think that -- I believe that he touched me first

23 with my underwear on, and then placed his hand under my

24 underwear. And I think at some point I, I removed them.

25 Q Okay. Did you also perform oral sex on him at th

1 A Unfortunately, yes.

2 Q And I think we've already gone into detail about

3 the dress on that. The next encounter is March 29th, 1997.

4 Would you tell us how that encounter was set up?

5 A It was, it was set up through my conversations with

6 Betty.

7 Q Did you contact Betty?

8 A Yes. I contacted Betty and Betty -- my

9 understanding was Betty spoke with the President, and then

10 Betty got in touch with me and told me to come that

11 afternoon. I did. I was waiting for the President in the

12 back study and then he hobbled in because he was on crutches.

13 And we were, we were in the back office. Actually, it was

14 sort of an overcast day. It had been raining earlier. So,

15 it was just sort of dark and overcast.

16 And we were, he was -- I think he had put his

17 crutches down and he was kind of leaning on me. So, I was

18 holding him, you know, I mean, sort of romantically but at

19 the same time literally holding him. And --

20 Q This is in the back study?

21 A Uh-huh, yes. And I was -- this was another one of

22 those occasions when I was babbling on about something, and

23 he just kissed me, kind of to shut me up, I think. And so w

24 were kissing and then we sort of -- we turned around and he

25 was leaning against -- he has a little, it's like a little

1 table that I think has this stereo. I don't know if the
2 stereo was always there. I know it was there later. But he
3 was leaning against this little table a little bit just, I
4 think, kind of for support.
5 And he unbuttoned my blouse and just sort of
6 touched me over, over my bra. And I don't think he took, I
7 don't think he exposed my breasts that day. And we were, we
8 were just kissing a lot.
9 And then he -- oh, he went to go put his hand down
10 my pants, and then I unzipped them because it was easier.
11 And I didn't have any panties on. And so he manually
12 stimulated me.
13 Q Did he bring you to orgasm?
14 A Yes, four times.
15 Q [redacted]
16 [redacted]
17 A [redacted]
18 Q [redacted]
19 A [redacted]
20 Q [redacted]
21 A [redacted]
22 Q [redacted]
23 [redacted]
24 A [redacted]
25 Q How did you end the contact with him on that

1995 that you've already testified some about. If you can, could you just tell us how that visit was set up, and then what occurred during the visit?

A The President came back to Mr. Panetta's office and I was the only person in the office at the time, and believe it was maybe around, I think, 10 p.m. or so, and asked me, or told me that if I wanted to meet him back in Mr. Stephanopoulos' office in about 5-10 minutes, that I could. And I told him I was interested to do that.

Q At that time, did you understand what it was he wanted to meet with you about?

A I had an idea. I, I, I had assumed that since we had been intimate in our previous encounter that evening, that we would again be intimate.

Q And just to clarify for the record, the intimacy that you had earlier that night was just kissing, is that correct?

A Yes.

Q So, did you, in fact, go meet with the President?

A Yes, I did.

Q And could you describe where you went to meet him?

A I met him back in Mr. Stephanopoulos' office and he invited me into the back study again, and we were in the hallway. And we were -- I don't remember exactly how it started. But I know that we were talking a bit and kissing.

1 I remember -- I know that he -- I believe I unbuttoned my
2 jacket and he touched my, my breasts with my bra on, and then
3 either -- I don't remember if I unhooked my bra or he lifted
4 my bra up, but he -- this is embarrassing.
5 Q Then touched your breasts with his hands?
6 A Yes, he did.
7 Q Did he touch your breasts with his mouth?
8 A Yes, he did.
9 Q Did he touch your genital area at all that day?
10 A Yes. We moved -- I believe he took a phone call in
11 his office, and so we moved from the hallway into the back
12 office, and the lights were off. And at that point, he, he
13 put his hand down my pants and stimulated me manually in the
14 genital area.
15 Q And did he bring you to orgasm?
16 A Yes, he did.
17 Q Back to the touching of your breasts for a minute,
18 was that then through clothing or actually directly onto your
19 skin?
20 A He touched my breasts through clothing, being my
21 bra, and then also without my bra on.
22 Q On that occasion, did you perform oral sex on the
23 President?
24 A Yes.
25 Q Who actually initiated your performing oral sex?

1087 EXHIBIT 66

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1 MR. EMMICK: Just to clarify, the witness is
2 looking at Grand Jury Exhibit ML-6.
3 THE WITNESS: I'm not really sure, because I don't
4 think it was to necessarily gratify him or arouse him.
5 A JUROR: What was it for?
6 THE WITNESS: It was just -- I thought it was funny
7 and it was sort of a -- I don't know how to explain it.
8 A JUROR: Contact.
9 BY MR. EMMICK:
10 Q Would it be better described as perhaps
11 affectionate or playful?
12 A Playful, I think. It was just -- playful, not
13 something I'd ever thought I'd have to discuss publicly.
14 A JUROR: While we're on this, I wanted to like
15 finish it up, but I had a couple of questions with regards to
16 the definition.
17 THE WITNESS: Sure.
18 A JUROR: Because I want to be sure in my own mind.
19 At the bottom it says -- it says "Contact means intentional
20 touching, either directly or through clothing."
21 THE WITNESS: Mm-hmm.
22 A JUROR: Out of all of the times you had intimate
23 contact, were there times when the President would touch you
24 either on the breasts or in the genital area directly to the
25 skin or was it always through clothing?

8/20/98 Dep.

1 THE WITNESS: Directly to the skin. Both.
2 MR. EMMICK: Yes, ma'am?
3 A JUROR: I have some questions about the 50th
4 birthday. That's when you gave the President the yellow tie.
5 Is that when you gave the President the yellow tie?
6 THE WITNESS: Not on that date.
7 A JUROR: But just before that.
8 THE WITNESS: But before that. Correct.
9 A JUROR: When it shows on the chart here, it says
10 "Some time before August 16, 1996."
11 THE WITNESS: Correct.
12 A JUROR: And that tie is the same tie that at the
13 end of your appearance here we saw some evidence that the
14 President has worn a number of times this summer.
15 THE WITNESS: Yes.
16 A JUROR: There's been some press accounts about
17 that tie, last night and today.
18 THE WITNESS: Sure.
19 A JUROR: My question to you is have you authorized
20 your attorneys or any other spokesperson through you to
21 discuss that evidence?
22 THE WITNESS: Gosh. I don't think I've necessarily
23 given a direct authorization.
24 A JUROR: Do you know that they have?
25 THE WITNESS: Do I know if they -- I -- I don't

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February 2, 1999

BY FAX (202) 546-1502
Cathy Jardim
Christopher Bitsko
Miller Reporting Co, Inc.
507 C Street, N.E.
Washington, D.C. 20002

Re: February 1, 1999, Monica S. Lewinsky Deposition Transcript

Dear Ms. Jardim and Mr. Bitsko:

Upon our review of the videotape and transcript of Monica S. Lewinsky's deposition transcript, we have noted the following errors or omissions:

Page	Line	Corrections
18	9	"9:19" should replace "9:21"
19	14	The oath and affirmation are not transcribed.
24	9	"second . . . " should replace "2d"
44	6	Comments by counsel are not transcribed.
61	11-13	Delete quotation marks. These are not direct quotes in this instance.
62	23	"town" should replace "down"
63	17	"called" should replace "found"
63	23	"after Thanksgiving" should follow "back."
63	24	Insert following line 23: A: Yes I did. Q: What did he tell you then?

Cathy Jardim
Christopher Bitsko
February 2, 1999
Page 2

65	21	"tchotchke" should replace "chochki"
65	24	"on" should replace "home"
66	20	The line should read: "see if I could see the President., I apologize," not "see if I could see the President and apologize."
75	1	"needed" should replace "need"
90	5	"the" should replace "some"
116	16	"said" should precede "list"
128	9	"that's" should replace "of"
154	5	Delete quotation marks.
156	6	"Seidman" should replace "Sideman"
161	15	"Fallon" should replace "Phalen"

Provided these changes are made, we will waive signature on behalf of Ms. Lewinsky.

We understand from Senate Legal Counsel that copies of this letter will be made available to the parties and Senate.

Thank you for your assistance.

Sincerely,

Plato Cacheris
Preston Burton
Sydney Hoffmann

cc: Monica S. Lewinsky (by hand)
Thomas B. Griffith, Esquire (by hand)

1

IN THE SENATE OF THE UNITED STATES

SITTING FOR THE TRIAL OF THE

IMPEACHMENT OF WILLIAM JEFFERSON CLINTON,

PRESIDENT OF THE UNITED STATES

VIDEO DEPOSITION OF

VERNON E. JORDAN, JR.

Tuesday, February 2, 1999

Washington, D.C.

The videotaped deposition of VERNON E. JORDAN, JR., taken pursuant to Senate Resolution 30, convened at 9:10 a.m., in The Capitol, Room S-407, Washington, D.C., when were present on behalf of the parties:

APPEARANCES:

On Behalf of President William Jefferson Clinton:

CHERYL D. MILLS, ESQ.
Deputy Counsel to the President
The White House
Washington, D.C. 20510

DAVID KENDALL, ESQ.
NICOLE K. SELIGMAN, ESQ.
Williams & Connolly
725 12th Street, N.W.
Washington, D.C. 20005

On Behalf of the Managers of the House of Representatives:

HON. ASA HUTCHINSON
HON. CHARLES T. CANADY
HON. JAMES E. ROGAN

2

APPEARANCES: (continued)

On Behalf of the Deponent Vernon E. Jordan, Jr.:

WILLIAM G. HUNDLEY, ESQ.
ANTHONY T. PIERCE, ESQ.
GLENDA C. WALDEN, ESQ.
AMY E. OVERTON, ESQ.
Akin, Gump, Strauss, Hauer & Feld, L.L.P.
1333 New Hampshire Avenue, N.W., Suite 400
Washington, D.C. 20036

Senators Present:

HON. FRED THOMPSON
HON. CHRISTOPHER J. DODD
HON. MIKE DeWINE
HON. PATRICK J. LEAHY
HON. ARLEN SPECTER
HON. JOHN EDWARDS

Senate Counsel Present:

THOMAS GRIFFITH, ESQ.
Legal Counsel
MORGAN FRANKEL, ESQ.
Deputy Legal Counsel
Senate Legal Counsel
642 Hart Office Building
Washington, D.C. 20510-7250

House of Representatives Counsel Present:

SUSAN BOGART, ESQ.
Investigative Counsel
Committee on the Judiciary
2138 Rayburn House Office Building
Washington, D.C. 20515

COURT REPORTERS:

CATHY JARDIM, RPR
THOMAS C. BITSKO, CVR-CM
Miller Reporting Company, Inc.
507 C Street, N.E.
Washington, D.C. 20002

VIDEOGRAPHERS:

THOMAS W. OLENDER, CLVS
GREGORY K. SMITH
Video Age, Inc.
1522 K Street, N.W., Suite 215
Washington, D.C. 20005

C O N T E N T S

WITNESS	EXAMINATION BY COUNSEL
VERNON E. JORDAN, JR.	
By Mr. Hutchinson	15
By Mr. Kendall	154

EXHIBITS

JORDAN DEPOSITION EXHIBIT NO.	MARKED	ADMITTED
No. 1	44	
No. 2	70	
Nos. 3, 4 and 5	72	76
No. 6	106	
No. 7	106	~~109~~ 8+E
No. 8	109	116
No. 9	121	
No. 10	~~149~~ 148	152

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1 P R O C E E D I N G S

2 [9:10 a.m.]

3 THE VIDEOGRAPHER: We are going on the record at
4 9:10 a.m.

5 SENATOR THOMPSON: Good morning, ladies and
6 gentlemen. We are on the record today, February 2nd, 1999.

7 I am Senator Fred Thompson, and along with Senator
8 Chris Dodd, I have been appointed by the Majority Leader and
9 the Democratic Leader of the United States Senate, acting
10 jointly, to preside over this deposition which is being
11 taken in the trial of the impeachment of William Jefferson
12 Clinton, President of the United States.

13 This deposition is being conducted pursuant to
14 Senate Resolution 30, which the Senate considered and agreed
15 to on January 28, 1999. Section 201 of that Resolution
16 authorized the issuance of a subpoena to Vernon E. Jordan,
17 Jr., for the taking of testimony on oral deposition. The
18 subpoena was issued by the Chief Justice of the United
19 States on Friday, January 29, 1999. Counsel for Mr. Jordan
20 agreed to accept service of that subpoena, which was made on
21 that same date.

22 By unanimous consent of the Senate, the Majority
23 Leader and the Democratic Leader were authorized, acting
24 jointly, to determine the time and place for the taking of
25 the depositions authorized by Senate Resolution 30. The

1 leaders, through Senate Legal Counsel, have conferred with
2 counsel for Mr. Jordan, the House Managers, and the
3 President's counsel, and have determined, acting jointly,
4 that Mr. Jordan's deposition should take place on this date,
5 Tuesday, February 2nd, 1999, in room S-407 of the Capitol
6 beginning at 9 o'clock a.m.
7 By unanimous consent of the Senate, the time
8 allotted for examination of Mr. Jordan by the parties shall
9 not exceed 8 hours. Each side may examine Mr. Jordan for up
10 to 4 hours. Time consumed by objections shall not be
11 charged to the questioning period. Senate Legal Counsel
12 shall advise the Presiding Officers of the time spent in
13 questioning by the parties. The Presiding Officers
14 anticipate that a 5-minute break will be taken every hour,
15 and that the deposition will recess for one hour at lunch at
16 approximately 12:30. Should the witness desire a recess at
17 any point, he should direct a request to the Presiding
18 Officers, who will make every effort to accommodate his
19 request. At any point, if the reporter or videographer
20 needs a pause in the proceedings for technical reasons,
21 please make that known so that we can accommodate you.
22 According to the terms of the Senate Resolution
23 30, the scope of the examination of Mr. Jordan by the
24 parties shall be limited to the subject matter reflected in
25 the Senate record. The questioning will begin first by

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1 House Managers, to be followed by the President's counsel.
2 Subsequent questioning by the parties will be permitted
3 within the time allotted, but the scope of such questioning
4 shall be limited to the subject matter of the prior
5 questioning.
6 Any objections by counsel for the witness or the
7 parties shall be directed to the Presiding Officer Senators,
8 who have authority to rule, as an initial matter, upon any
9 question arising out of the deposition. Rulings of the
10 Presiding Officers may be appealed to the full Senate
11 following the completion of the deposition. The Senate will
12 consider any such appeals when it next convenes in this
13 impeachment proceeding on Thursday, February 4. The
14 reporter shall note any objection upon the record, but the
15 examination shall proceed, and the witness shall answer such
16 question. The witness may refuse to answer a question only
17 when necessary to preserve a legally recognized privilege or
18 constitutional right.
19 Section 205 of Senate Resolution 30 requires that
20 these depositions be conducted in private. Attendance at
21 this deposition is limited to the witness, his counsel, the
22 House Managers and counsel, counsel for the President, the
23 Presiding Officer Senators, Senate Legal Counsel and Deputy
24 Legal Counsel, Senate personnel whose presence is required
25 as determined by the Majority Leader and the Democratic

1 Leader, and those persons whose attendance is required to
2 make and preserve a record of these proceedings.
3 I note that according to the terms of Section 205:
4 "All present must maintain the confidentiality of the
5 proceedings." For Senators and Senate employees, they
6 should be aware that this deposition is a
7 "confidential...proceeding[] of the Senate," under Senate
8 Rule 29.5. This deposition may be discussed only with
9 members of the Senate and staff designated by members.
10 House Managers and House employees may only discuss this
11 deposition with fellow Managers and staff designed by the
12 Managers. The President's counsel may only discuss this
13 deposition with the President and counsel and staff
14 representing the President in this matter. The witness and
15 his counsel may only discuss this deposition with each
16 other. This injunction remains in effect unless ordered
17 otherwise by the United States Senate. Moreover, any record
18 of this deposition made available must similarly be kept
19 confidential until further order of the United States
20 Senate. All persons are admonished to conduct themselves
21 accordingly.
22 A videotape record and transcription of this
23 deposition are being made and will be made available for
24 review by Members of the Senate, one designated staff member
25 per Senator, the Chief Justice of the United States, the

8

1 House Managers, the President's counsel, and the witness'
2 counsel for their review in connection with the impeachment
3 proceedings.
4 As I mentioned, I am joined today as Presiding
5 Officer of this deposition by Senator Chris Dodd.
6 Senator Dodd, do you have anything that you would
7 like to add?
8 SENATOR DODD: Well, thank you, Senator Thompson.
9 For the record, I am Senator Christopher Dodd, and
10 along with Senator Fred Thompson, been appointed by the
11 Majority Leader and the Democratic Leader of the United
12 States Senate, acting jointly, to preside over this
13 deposition which is being taken in the trial of the
14 impeachment of William Jefferson Clinton, President of the
15 United States.
16 I concur with everything that Senator Thompson has
17 said in his opening remarks, and would just add two points,
18 if I may.
19 With regard to the objections--this is, by the
20 way--yesterday, Senator DeWine and Senator Leahy worked out
21 several questions regarding some process issues, one of
22 those dealing with objections. Counsel for the witness and
23 the parties may make objections, which shall be directed to
24 the Presiding Officer Senators who have the authority to
25 rule as an initial matter upon any question arising out of

1 the deposition. The Presiding Officers will confer, as
2 necessary, to address objections, and will seek, where
3 possible, to reach agreement. For this purpose, we may need
4 to go briefly off the record to discuss any resolve any
5 pending objections.
6 Lastly, I just want to mention on the section that
7 Senator Thompson read about the confidentiality of these
8 proceedings, I think about a half an hour passed yesterday
9 before the details of all of these matters were available to
10 the press, and I just want to reinforce that notion that
11 this has to be taken very, very seriously. And we hope that
12 all involved here will take note of what Senator Thompson
13 has said about the confidentiality of these proceedings.
14 And with that, Senator, I'm--
15 SENATOR THOMPSON: Thank you very much, Senator
16 Dodd.
17 At this time, I would invite each of those present
18 around the table to introduce themselves.
19 May we start with you?
20 MS. WALDEN: Yes. I'm Glenda Walden.
21 MR. HUNDLEY: William G. Hundley.
22 SENATOR THOMPSON: Counsel for?
23 MR. HUNDLEY: Counsel for Mr. Jordan.
24 SENATOR THOMPSON: All right.
25 MR. JORDAN: I'm Vernon E. Jordan, Jr.

10

1 MS. OVERTON: Amy Overton.
2 MR. PIERCE: Anthony Pierce.
3 MR. FRANKEL: Morgan Frankel, Deputy Senate Legal
4 Counsel.
5 MR. GRIFFITH: Tom Griffith, Senate Legal Counsel.
6 SENATOR THOMPSON: All right.
7 MS. BOGART: Susan Bogart, with the House
8 Managers.
9 SENATOR DODD: You've got to speak up a little
10 bit. Do we have it?
11 MS. BOGART: Susan Bogart, with the House
12 Managers.
13 MR. HUTCHINSON: Asa Hutchinson, representing the
14 House Manager.
15 MR. KENDALL: I'm David Kendall, personal counsel
16 to President Clinton.
17 MS. MILLS: Cheryl Mills, Deputy Counsel to the
18 President.
19 SENATOR THOMPSON: Okay. Assisting Senator Dodd
20 and myself are Senate Legal Counsel, Tom Griffith, and
21 Deputy Legal Counsel, Morgan Frankel.
22 I would also note the presence in the room of
23 Senators DeWine and Leahy, who have also been appointed
24 Presiding Officers by the Majority Leader and the Democratic
25 Leader.

11

1 The videographers today are Thomas Olender and
2 Gregory Smith, employed by Video Age of Washington, D.C.
3 The court reporters today are Cathy Jardim and Christopher
4 Bitsko of Miller Reporting Service.
5 If there are no questions from the parties or
6 counsel for the witness, I will now swear the witness. Mr.
7 Jordan, please raise your right hand.
8 MR. KENDALL: Senator Thompson?
9 SENATOR THOMPSON: Yes.
10 MR. KENDALL: Excuse me. I do have an objection.
11 We received the exhibits for today's deposition in a binder
12 here, approximately 15 minutes ago. I object because Senate
13 Resolution 30 quite clearly provides in Section 204 that
14 parties taking a deposition will provide to the other side,
15 18 hours in advance of the deposition, copies of the
16 deposition exhibits.
17 Now, yesterday, at the deposition of Ms. Lewinsky,
18 Deputy White House Counsel, Cheryl Mills, filed a similar
19 objection because, likewise, we had not been provided the
20 exhibits to the Lewinsky deposition in an appropriate and
21 timely manner.
22 The Presiding Officers, Senator DeWine and Senator
23 Leahy, ruled yesterday that the language of Section 204
24 means what it says, 18 hours in advance, we're to be
25 provided copies of deposition exhibits.

12

1 Now, yesterday afternoon, mid-afternoon, I did
2 receive a schedule of deposition exhibits, which appears to
3 be somewhat different than the schedule I see in this
4 binder, and I received about, perhaps, half-an-inch of
5 documents. We elected to proceed yesterday, not abandoning
6 our objection. We'll do our best to proceed in good faith
7 today, but I want to put the House Managers on notice that
8 tomorrow, we will move to strike any exhibit that we do not
9 receive in a timely fashion, and that would be by 3 o'clock
10 this afternoon. We will attempt to go forward today,
11 reserving our objection.
12 SENATOR THOMPSON: All right. Representative
13 Hutchinson, do you have any comments to make on that issue?
14 MR. HUTCHINSON: Senator Thompson, yes. The House
15 Managers did submit to the White House and to Mr. Hundley an
16 itemization of the exhibits that would--could be referred to
17 in the testimony today by description, in reference to the
18 Senate record, volume, and part, and description of the
19 particular exhibit.
20 For example, we referenced as an exhibit the
21 deposition of Vernon Jordan and exhibits thereto, which was
22 taken--which is in Senate record, Volume IV, Part 2. We did
23 not put the page citation to the deposition of Vernon Jordan
24 and the exhibits, but, of course, that is very bulky and
25 would encompass, I think, about 200 pages for that

1 particular deposition, and so on through the itemization
2 that was submitted to the White House and to Mr. Hundley.
3 Subsequent to that--and we were not aware, Senator
4 Thompson, of the ruling that was made at the deposition
5 yesterday. When Ms. Mills called and advised us of that
6 issue and requested the page citations, we set about doing
7 that, along with the actual copies of the exhibits, and that
8 was not available until a little after 8:00 last night
9 because, understandably, they were--had left the White
10 House, that was not delivered to them at that point.
11 SENATOR THOMPSON: If I might interject at that
12 point, I don't want to create an issue where there's not
13 one. I do believe that the objection of counsel for the
14 White House is a good one. I don't--I don't believe that a
15 general reference, such as you described, really complies
16 with the rule, but, as I understand it--and I think we
17 would--we would want to make any accommodation to you,
18 however, to--if actual notice is provided and time enough is
19 given to opposite counsel, I think it is probably something
20 we could work out, but as I understand it, counsel is--is
21 agreeable to go forward.
22 If counsel needs any time as we proceed with these
23 exhibits, then please tell us. We'll give you any
24 reasonable time that you might need with regard to these
25 exhibits, and I will state again today what evidently was

14

1 ruled yesterday. And I've conferred with Senator Dodd on
2 this previous, and I believe I'm speaking for him, too, that
3 we should--we should go on notice from here on that we do
4 need to comply with that more specifically in terms of
5 providing actual copies of the exhibits as far as tomorrow's
6 deposition is concerned.
7 So let's--let's proceed. The point is--is noted,
8 well taken, and as we proceed, as I indicated, if some time
9 is needed to go over these exhibits, we can accommodate
10 that.
11 Senator Dodd?
12 SENATOR DODD: Yeah. I agree with what Senator
13 Thompson has said and would just note for the record that I
14 was at the deposition yesterday. I counted some eight
15 members of the House Managers team who were here for that
16 deposition. And certainly, given the fact that it was a
17 problem yesterday or matter that did not become an issue--it
18 was resolved to the satisfaction of everyone--I would just
19 urge today, House Manager Hutchinson, that whatever
20 communications you may need to make to the other Managers
21 that we not have a repeat performance of this tomorrow when
22 we come in here. So I agree otherwise with Senator
23 Thompson.
24 MR. HUNDLEY: We certainly concur. We received
25 them, I think, 10 o'clock last night, and we're ready to

1 proceed and we want to proceed.

2 SENATOR THOMPSON: All right. And same as I

3 indicated to House counsel, Mr. Hundley, if you need time as

4 we proceed with any--any document, just please inform us and

5 we'll make that available to you.

6 MR. HUNDLEY: Well, I'd be very surprised if we

7 need it.

8 SENATOR THOMPSON: All right. If there are no

9 further questions from the parties or counsel for the

10 witness, I'll now swear in the witness. Mr. Jordan, will

11 you please raise your right hand?

12 Do you, Vernon E. Jordan, Jr., swear that the

13 evidence you shall give in this case now pending between the

14 United States and William Jefferson Clinton, President of

15 the United States, shall be the truth, the whole truth, and

16 nothing but the truth, so help you, God?

17 THE WITNESS: I do.

18 Whereupon,

19 VERNON E. JORDAN, JR.

20 was called as a witness and, after having been first duly

21 sworn by Senator Fred Thompson, was examined and testified

22 as follows:

23 SENATOR THOMPSON: All right. The House Managers

24 may begin their questioning of the witness.

25 MR. HUTCHINSON: Thank you, Senator Thompson and

26 Senator Dodd.

27 EXAMINATION BY HOUSE MANAGERS

28 BY MR. HUTCHINSON:

16

1 Q Good morning, Mr. Jordan. For the record, would
2 you state your name, please?
3 A Good morning, Congressman. My name is Vernon E.
4 Jordan, Jr.
5 Q And, Mr. Jordan, we have not had the opportunity
6 to meet previously, is that correct?
7 A That is correct.
8 Q And I do appreciate--I have met your counsel, Mr.
9 Hundley, in his office, and so I've looked forward to this
10 opportunity to meet you. Now, you have--
11 A I can't say that the feeling is mutual.
12 [Laughter.]
13 BY MR. HUTCHINSON:
14 Q I certainly understand.
15 You have testified, I believe, five times
16 previously before the Federal grand jury?
17 A That is correct.
18 Q And so I know that probably about every question
19 that could be asked has been asked, but there are a number
20 of reasons I want to go over additional questions with you,
21 and some of them will be repetitious of what's been asked
22 before.
23 Prior to coming in today, though, have you had the
24 opportunity to review your prior testimony in those five
25 appearances before the grand jury?
26 A I have done some preparation, Congressman.
27 Q And let me start with the fact that the oath that
28 you took today is the same as the oath that you took before

1 the Federal grand jury?
2 A I believe that's correct.
3 Q And, Mr. Jordan, what is your profession?
4 A I am a lawyer.
5 Q And where do you practice your profession?
6 A I am a senior partner at the law firm of Akin,
7 Gump, Strauss, Hauer & Feld, here in Washington, D.C., with
8 offices in Texas, California, Pennsylvania and New York,
9 three offices in Europe, London, Brussels and Moscow.
10 Q And how long have you been a senior partner?
11 A I have been a senior partner--well, I didn't start
12 out as a senior partner. I started out as a partner, and at
13 some point--I don't know when, but not long thereafter I was
14 elevated to this position of senior partner.
15 Q And what type of law do you practice?
16 A I am a corporate international generalist at Akin,
17 Gump.
18 Q And does Akin, Gump have about 800 lawyers?
19 A We have about 800 lawyers, yes.
20 Q Which is an incredible number for lawyers from
21 someone who practiced law in Arkansas.
22 How do all of those lawyers--
23 A We have some members of our law firm who are from
24 Arkansas, so it's not unusual for them.
25 Q And how is it that you are able to obtain enough

1 business for 800 lawyers?
2 A I don't think that's my entire responsibility.
3 I'm just one of 800 lawyers, and that is what I do in part,
4 but I'm not alone in that process of making rain.
5 Q When you say "making rain," that's the terminology
6 of being a rainmaker?
7 A I think even in Arkansas, you understand what
8 rainmaking is.
9 Q We've read Grisham books.
10 And so, when you say making rain or being a
11 rainmaker, that is to bring in business so that you can keep
12 the lawyers busy practicing law?
13 A Well, that is--that is part and parcel of the
14 practice of law.
15 Q And do you bill by the hour?
16 A I do not.
17 Q And I understand you used to, but you do not
18 anymore?
19 A I graduated.
20 Q A fortunate graduation.
21 And when the--when you did bill by the hour, what
22 was your billable rate the last time you had to do that?
23 A I believe my billable rate at the last time was
24 somewhere between 450 and 500 an hour.
25 Q Now, would you describe--

1 A Not bad for a Georgia boy. I'm from Georgia.
2 You've heard of that State, I'm sure.
3 Q It's probably not bad from Washington standards.
4 Would you describe the nature of your relationship
5 with President Clinton?
6 A President Clinton has been a friend of mine since
7 approximately 1973, when I came to your State, Arkansas, to
8 make a speech as president of the National Urban League
9 about race and equal opportunity in our Nation, and we met
10 then and there, and our friendship has grown and developed
11 and matured and he is my friend and will continue to be my
12 friend.
13 Q And just to further elaborate on that friendship,
14 it's my understanding that he and his--and the First Lady
15 has had Christmas Eve dinner with you and your family for a
16 number of years?
17 A Every year since his Presidency, the Jordan family
18 has been privileged to entertain the Clinton family on
19 Christmas Eve.
20 Q And has there been any exceptions in recent years
21 to that?
22 A Every year that he has been President, he has had,
23 he and his family, Christmas Eve with my family.
24 Q And have you vacationed together with the Clinton
25 family?

20

1 A Yes. I think you have seen reels of us playing
2 golf and having fun at Martha's Vineyard.
3 Q And so you vacation together, you play golf
4 together on a semi-regular basis?
5 A Whenever we can. We've not been doing it
6 recently, for reasons that I think are probably very obvious
7 to you, Counsel.
8 Q Well, explain that to me.
9 A Just what I said, for a time, I was going before
10 the grand jury, and under the advice of counsel and I'm sure
11 under advice of the President's counsel, it was thought best
12 that we not play golf together.
13 So, from the time that I first went to the grand
14 jury, I don't think--we have not played golf this year,
15 unfortunately, together.
16 Q Since you--I think your first appearance at the
17 grand jury was March 3 of '98. Then you went March 5, and
18 then in May, I believe you were two times before the grand
19 jury and then one in June of '98.
20 Since your last testimony before the grand jury in
21 June of '98, have you been in contact with the President of
22 the United States?
23 A Yes, I have.
24 Q And are these social occasions or for business
25 purposes?

1 A Social occasions. I was invited to the Korean
2 State Dinner. I forget when that was. I think that was the
3 first time I was in the White House since Martin Luther King
4 Day of last year.
5 I saw the President at Martha's Vineyard. I was
6 there when he got off Air Force One to greet him and welcome
7 him to--to the Vineyard, and I was at the White House for
8 one of the performances about music. The Morgan State Choir
9 sang, and so I've been to the White House only for social
10 occasions in the last year since Martin Luther King's
11 birthday, I believe.
12 Q Have you had any private conversations with the
13 President?
14 A Yes, I have, as a matter of fact.
15 Q And has this been on the telephone or in person?
16 A I've talked to him on the telephone, and I talked
17 to him at the Vineyard. He was at my house on Christmas
18 Eve. There were a lot of people around, but, yes, I've
19 talked to the President.
20 Q And did you discuss your testimony before the
21 grand jury or his testimony before the grand jury?
22 A I did not.
23 Q There was one reference that he made in his
24 Federal grand jury testimony, and I'll refer counsel, if
25 they would like. It was on page 77 of the President's

22

1 testimony in his appearance before the grand jury on August
2 17th.
3 And he referenced discussions with you, and he
4 said, "I think I may have been confused in my memory because
5 I've also talked to him on the phone about what he said,
6 about whether he had talked to her or met with her. That's
7 all I can tell you," and I believe the "her" is a reference
8 to Ms. Lewinsky.
9 And it appeared to me from reading that, that
10 there might have been some conversations with you by the
11 President, perhaps in reference to your grand jury testimony
12 or your knowledge of when and how you talked to Ms.
13 Lewinsky.
14 A If I understand your question about whether or not
15 the President of the United States and I talked about my
16 testimony before the grand jury or his testimony before the
17 grand jury, I can say to you unequivocally that the
18 President of the United States and I have not discussed our
19 testimony. I was advised by my counsel, Mr. Hundley, not to
20 discuss that testimony, and I have learned in this process,
21 Mr. Hutchinson, to--to take the advice of counsel.
22 Q I would certainly agree that that is good counsel
23 to take, but going back to the question--and I will try to
24 rephrase it because it was a very wordy question that I
25 asked you--and it's clear from your testimony that you have

1 not discussed your grand jury testimony--
2 A That is correct.
3 Q --but did you, subsequent to your last testimony
4 before the grand jury, talk to the President in which you
5 discussed conversation that you have had with Monica
6 Lewinsky?
7 A I have not discussed a conversation that I have
8 had with Monica Lewinsky with the President of the United
9 States.
10 Q And have you had any discussions about Monica
11 Lewinsky with the President of the United States since your
12 last testimony before the grand jury?
13 A I have not.
14 Q Now, going back to your relationship with the
15 President, you have been described as a friend and advisor
16 to the President. Is that a fair terminology?
17 A I think that's fair.
18 Q And in the advisor capacity, had you served as
19 co-chairman of the Clinton-Gore transition team in 1992?
20 A I believe I was chairman.
21 Q That is an important distinction.
22 And have you served in any other official or
23 semi-official capacities for this administration?
24 A I have not, except that I was asked by the
25 President to lead the American delegation to the

1 inauguration of President Li in Taiwan, and that was about
2 as official as you can get, but that beyond that, I have
3 not--not had any official capacity.
4 For a very brief moment, very early in the
5 administration, I was appointed to the Foreign Intelligence
6 Advisory Committee, and I went to one meeting and stayed
7 half that meeting, went across the street and told Bruce
8 Lindsey that that was not for me.
9 Q Now, let's move on. After we've established to a
10 certain degree your relationship with the President, let's
11 move on to January 20th of 1998, and just to put that in
12 clearer terms, this is a Tuesday after the January 17
13 deposition of President Clinton in the Paula Jones civil
14 rights case. Do you recall that time frame?
15 A [Nodding head up and down.]
16 Q This is in the afternoon of January 20th, again,
17 after the President's deposition. You contacted Mr. Howard
18 Gittis, who I believe is General Counsel of McAndrews &
19 Forbes Holdings?
20 A Howard Gittis is Vice Chairman of McAndrews,
21 Forbes, and he is not the General Counsel. He is a lawyer,
22 but he is not the General Counsel.
23 Q And what was the purpose of you contacting Mr.
24 Howard Gittis on January 20th?
25 A If I talked to Howard Gittis on the 20th, I don't

1 recall exactly what my conversation with Howard Gittis was
2 about. I think it was a telephone call, maybe.
3 Q And that's difficult. Let me see if I can't help
4 you in that regard.
5 A Right.
6 Q Was the purpose of that call with Mr. Gittis to
7 arrange breakfast the next morning on January 21st?
8 A Yeah. I was in New York, and I did call Mr.
9 Gittis and say--and as I remember, I had breakfast with him
10 on the 21st, I believe. Yes, I did.
11 Q And this is a breakfast that you had set up?
12 A Yes.
13 Q And what was the reason you made the decision to
14 request a breakfast meeting with Mr. Gittis?
15 A Yes. As I remember, I had gotten a telephone call
16 from David Bloom at 1 o'clock in the morning at the St.
17 Regis Hotel about the matter that was about to break having
18 to do with the entire Lewinsky matter, and I had not at any
19 time discussed the Lewinsky matter with--with Howard Gittis.
20 And so I had breakfast with him to tell him that reporters
21 were calling, that this would obviously involve Revlon,
22 which had responded to my--my efforts to find Ms. Lewinsky
23 employment, and so Howard Gittis is a friend of mine.
24 Howard Gittis is a fellow board member with me at Revlon.
25 He is the Vice Chairman of McAndrews & Forbes, and I thought

26

1 it--I thought I had--it was incumbent upon me to stop and
2 say, "Listen, there's trouble a-brewing."
3 Q And just--you've mentioned McAndrews & Forbes and
4 Revlon. McAndrews & Forbes, am I correct, is the parent
5 company of--
6 A It's the holding company.
7 Q The holding company of Revlon and presumably other
8 companies.
9 And you sit on the board of McAndrews & Forbes?
10 A I do not. I sit on the board of Revlon.
11 Q All right. And that is a position that brings you
12 an annual salary--
13 A There is a director's fee.
14 Q You receive a director's fee, and in addition,
15 your law firm receives--from business from--
16 A We do--
17 Q --Revlon?
18 A We do. We do business. We've represented Revlon,
19 and we represented Revlon before I was elected a director.
20 Q And you mention that things were breaking that you
21 felt like you needed to advise Mr. Gittis concerning. At
22 the time that you made the arrangements for the breakfast on
23 January 21st, had you become aware of the Drudge Report?
24 A Yes, I had.
25 Q And you had had lunch with Bruce Lindsey on

1 January 20th?

2 A No. I don't think it was on January--it was on

3 Sunday. No, that was not the 20th.

4 Q And during that luncheon, did you become aware of

5 the Drudge Report--

6 A That is correct.

7 Q --and receive a copy of it?

8 A That is correct.

9 Q And that was from Bruce Lindsey?

10 A That is correct.

11 Q And that Drudge Report, did it mention your name?

12 A I don't think so, but I don't remember.

13 Q Was there some news stories that had mentioned

14 your name in reference to Ms. Lewinsky and the President?

15 A I believe that my name has been an integral part

16 of this process from the beginning.

17 Q And did you in fact have the breakfast meeting

18 with Mr. Gittis?

19 A Yes, I did.

20 Q And what information did you convey to Mr. Gittis

21 concerning Ms. Lewinsky at that breakfast meeting?

22 A I just simply said that the press was calling

23 about Ms. Lewinsky; that while I had not dealt with him, I

24 had dealt with Richard Halperin, I had dealt with Ronald

25 Perelman. I had not dealt with him, but that he ought to

1 know and that I was sorry about this.

2 And I also said that it would probably be even

3 more complicated because early on I had referred Webb

4 Hubbell to them to be hired as counsel.

5 Q And I want to get to that in just a moment, but

6 you indicated that you said you were sorry. Were you

7 referring to the problems that this might create for the

8 company?

9 A Well, I was obviously concerned. I am a director.

10 I am their counsel. They're my friends. And publicity was

11 breaking. I thought I had some responsibility to them to

12 give them a heads-up as to what was going on.

13 Q Now, is it true that your efforts to find a job

14 for Ms. Lewinsky that you referenced in that meeting with

15 Mr. Gittis--were your efforts carried out at the request of

16 the President of the United States?

17 A There is no question but that through Betty

18 Currie, I was acting on behalf of the President to get Ms.

19 Lewinsky a job. I think that's clear from my grand jury

20 testimony.

21 Q Okay. And I just want to make sure that that's

22 firmly established. And in reference to your previous grand

23 jury testimony, you indicated, I believe, on May 28th, 1998,

24 at page 61, that "She"--referring to Betty Currie--"was the

25 one that called me at the behest of the President."

1 A That is correct, and I think, Congressman, if in
2 fact the President of the United States' secretary calls and
3 asks for a request that you try to do the best you can to
4 make it happen.
5 Q And you received that request as a request coming
6 from the President?
7 A I--I interpreted it as a request from the
8 President.
9 Q And then, later on in June of '98 in the grand
10 jury testimony at page 45, did you not reference or testify
11 that "The President asked me to get Monica Lewinsky a job"?
12 A There was no--there was no question but that he
13 asked me to help and that he asked others to help. I think
14 that is clear from everybody's grand jury testimony.
15 Q And just one more point in that regard. In the
16 same grand jury testimony, is it correct that you testified
17 that "He"--referring to the President--"was the source of it
18 coming to my attention in the first place"?
19 A I may--if that is--if you--if it's in the--
20 Q It's at page 58 of the grand jury--
21 A I stand on my grand jury testimony.
22 Q All right. Now, during your efforts to secure a
23 job for Ms. Lewinsky, I think you mentioned that you talked
24 to Mr. Richard Halperin.
25 A Yes.

30

1 Q And he is with McAndrews & Forbes?
2 A Yes.
3 Q And you also at one point talked to Mr. Ron
4 Perelman; is that correct?
5 A I made a call to Mr. Perelman, I believe, on the
6 8th of January.
7 Q And he is the--
8 A He is the chairman/CEO of McAndrews Forbes. He is
9 a majority shareholder in McAndrews Forbes. This is his
10 business.
11 Q Now, at the time that you requested assistance in
12 obtaining Ms. Lewinsky a job, did you advise Mr. Perelman or
13 Mr. Halperin of the fact that the request was being carried
14 out at the request of the President of the United States?
15 A I don't think so. I may have.
16 Q Well, the first answer you gave was "I don't think
17 so." Now, in fact, you did not advise either Mr. Perelman
18 or Mr. Halperin of that fact because am I correct that Mr.
19 Perelman--or, excuse me, Mr. Gittis--expressed some concern
20 that Revlon was never advised of that fact?
21 A Then, uh, I cannot say, I guess, precisely that I
22 told that "I am doing this for the President of the United
23 States."
24 I do believe, on the other hand, that given the
25 fact that she was in the White House, given the fact that

1 she had been a White House intern, I would not be surprised
2 if that was their understanding.
3 Q Well, in your conversation with Mr. Halperin.
4 A Yes--I'm certain I did not say that to Richard
5 Halperin.
6 Q Okay. So there's no question that you did not
7 tell Mr. Halperin that you were acting at the request of the
8 President?
9 A I'm fairly certain I did not.
10 Q And in your conversation with Mr. Perelman, did
11 you indicate to him that you were calling--or you were
12 seeking--employment for Ms. Lewinsky at the request of the
13 President?
14 A Yes--I don't think that I, that I made that
15 explicit in my conversation with Mr. Perelman, and I'm not
16 sure I thought it necessary to say "This is for the
17 President of the United States."
18 By the same token, I would have had no hesitance
19 in doing that.
20 Q Now, at the time that you had called Mr. Perelman,
21 which I believe you testified was in January of '98--
22 A That's right.
23 Q --I think you said January 8th--
24 A Right.
25 Q --you were aware at that time, were you not, that

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1 Ms. Lewinsky had received a subpoena to give a deposition in
2 the Jones versus Clinton case?
3 A That is correct.
4 Q At the time that you talked to Mr. Perelman
5 requesting his assistance for Monica Lewinsky, did you
6 advise Mr. Perelman of the fact that Ms. Lewinsky was under
7 subpoena in the Jones case?
8 A I did not.
9 Q And when you--did Mr. Perelman, Mr. Gittis or Mr.
10 Halperin ever express to you disappointment that they were
11 not told of two facts--either of these two facts--one, that
12 Ms. Lewinsky was being helped at the request of the
13 President; and secondly, that she was known by you and the
14 President to be under subpoena in that case?
15 A No.
16 Q Now, you are on the board of directors of Revlon.
17 A I am.
18 Q And how long have you been on the board of Revlon?
19 A I forget. Ten years, maybe.
20 Q And as a member of the board of directors, do you
21 not have a fiduciary responsibility to the company?
22 A I do.
23 Q And how would you define a fiduciary
24 responsibility?
25 A I define my fiduciary responsibility to the

1 company about company matters.

2 Q And how would you define fiduciary responsibility

3 in reference to company matters?

4 A Anything that has to do with the company, that I

5 believe in the interest of the company, I have some

6 fiduciary responsibility to protect the company, to help the

7 company in any way that I--that is possible.

8 Q And is fiduciary responsibility sometimes

9 considered a trust relationship in which you owe a degree of

10 trust and responsibility to someone else?

11 A I think--I think that "trust" and "fiduciary" are

12 probably synonymous.

13 Q Okay. Do you believe that you were acting in the

14 company's interest or the President's interest when you were

15 trying to secure a job for Ms. Lewinsky?

16 A Well, what I knew was that the company would take

17 care of its own interest. This is not the first time that I

18 referred somebody, and what I know is, is that if a person

19 being referred does not meet the standards required for that

20 company, I have no question but that that person will not be

21 hired. And so the referral is an easy thing to do; the

22 judgment about employment is not a judgment as a person

23 referring that I make. But I do have confidence in all of

24 the companies on whose boards that I sit that, regardless of

25 my reference, that as to their needs and as to their

1 expectations for their employees that they will make the
2 right decisions, as happened in the American Express
3 situation.
4 American Express called and said: We will not
5 hire Ms. Lewinsky. I did not question it, I did not
6 challenge it, because they understood their needs and their
7 needs in comparison to her qualifications. They made a
8 judgment. Revlon, on the other hand, made another judgment.
9 I am not the employer, I am the referrer, and
10 there is a major difference.
11 Q Now, going back to what you knew as far as
12 information and what you conveyed to Revlon, you indicated
13 that you did not tell Mr. Halperin that you were making this
14 request or referral at the request of the President of the
15 United States.
16 A Yes, and I didn't see any need to do that.
17 Q And then, when you talked to Mr.--
18 A Nor do I believe not saying that, Counselor, was a
19 breach of some fiduciary relationship.
20 Q And when you had your conversation with Mr.
21 Perelman--
22 A Right.
23 Q --at a later time--
24 A Right.
25 Q --you do not remember whether you told him--you do

1 not believe you told him you were calling for the President-
2
3 A I believe that I did not tell him.
4 Q --but you assumed that he knew?
5 A No. I did not make any assumptions, let me say.
6 I said: Ronald, here is a young lady who has been
7 interviewed. She thinks the interview has not gone well.
8 See what you can do to make sure that she is properly
9 interviewed and evaluated--in essence.
10 Q And did you reference her as a former White House
11 intern?
12 A Probably. I do not have a recollection of whether
13 I described her as a White House intern, whether I described
14 her as a person who had worked for the Pentagon. I said
15 this is a person that I have referred.
16 I think, Mr. Hutchinson, that I have sufficient,
17 uh, influence, shall we say, sufficient character, shall we
18 say, that people have been throughout my career able to take
19 my word at face value.
20 Q And so you didn't need to reference the President.
21 The fact that you were calling Mr. Perelman--
22 A That was sufficient.
23 Q --and asking for a second interview for Ms.
24 Lewinsky, that that should be sufficient?
25 A I thought it was sufficient, and obviously, Mr.

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1 Perelman thought it was sufficient.

2 Q And so there is no reason, based on what you told

3 him, for him to think that you were calling at the request

4 of the President of the United States?

5 A I think that's ~~about~~ ~~right~~ probably.

6 Q And so, at least with the conversation with Mr.

7 Halperin and Mr. Perelman, you did not reference that you

8 were acting in behalf of the President of the United States.

9 Was there anyone else that you talked to at Revlon in which

10 they might have acquired that information?

11 A The only persons that I talked to in this process,

12 as I explained to you, was Mr. Halperin and Mr. Perelman

13 about this process. And it was Mr. Halperin who put the--

14 who got the process started.

15 Q So those are the only two you talked about, and

16 you made no reference that you were acting in behalf of the

17 President?

18 A Right.

19 Q Now, the second piece of information was the fact

20 that you knew and the President knew that Ms. Lewinsky was

21 under subpoena in the Jones case, and that information was

22 not provided to either Mr. Halperin or to Mr. Perelman; is

23 that correct?

24 A That's correct.

25 Q Now, I wanted to read you a question and answer of

1 Mr. Howard Gittis in his grand jury testimony of April 23,
2 1998.
3 The question was: "Now, you had mentioned before
4 that one of the responsibilities of director is to have a
5 fiduciary duty to the company. If it was the case that Ms.
6 Lewinsky had been noticed as a witness in the Paula Jones
7 case, and Vernon Jordan had known that, is that something
8 that you believe as a person who works for McAndrews &
9 Forbes, is that something that you believe that Mr. Jordan
10 should have told you, or someone in the company, not
11 necessarily you, but someone in the company, when you
12 referred her for employment?"
13 His answer was "Yes."
14 Do you disagree with Mr. Gittis' conclusion that
15 that was important information for McAndrews & Forbes?
16 A I obviously didn't think it was important at the
17 time, and I didn't do it.
18 Q Now, in your previous answers, you reference the
19 fact that you--
20 A I think, on the other hand, that had she been a
21 defendant in a murder case and I knew that, then I probably
22 wouldn't have referenced her. But her being a witness in a
23 civil case I did not think important.
24 Q Despite the fact that you were acting at the
25 request of the President, and this witness was potentially

1 adverse to the President's interest in that case?
2 A I didn't know that. I mean, I don't--I don't know
3 what her position was or whether it was adverse or not.
4 Q All right. Mr. Jordan, prior to you answering
5 that, did you get an answer from your attorney?
6 A My attorney mumbled something in my ear, but I
7 didn't hear him.
8 MR. HUNDLEY: It was a spontaneous remark. I'll
9 try to refrain.
10 MR. HUTCHINSON: I know that--
11 THE WITNESS: He does have a right to mumble in my
12 ear, I think.
13 MR. HUNDLEY: I mumble too loud because I don't
14 hear too well myself.
15 BY MR. HUTCHINSON:
16 Q Now, going back to a complicating factor in your
17 conversation with Mr. Gittis and this embarrassing situation
18 of the Lewinsky job, the complicating fact was that you had
19 also helped Webb Hubbell get a job or consulting contracts
20 with the same company; is that--
21 A Yes. You use the word "complicated." I did not
22 view it as a complication. I viewed it as a, as another
23 something that happened, and that that caused some
24 embarrassment to the company, and here again, we were back
25 for another embarrassment for the company, and I thought I

1 had a responsibility to say that.

2 Q Would you explain how you helped Webb Hubbell

3 secure a job or a contract with Revlon?

4 A Yes. Webb Hubbell came to me after his

5 resignation from the Justice Department. Webb and I got to

6 be friends during the transition, and Webb came to me and he

7 said, "I'm leaving the Justice Department," or "I've left

8 the Justice Department"--I'm not sure which--and he said, "I

9 really need work."

10 And I said, "Webb, I will do what I can to help

11 you."

12 I called New York, made arrangements. I took Webb

13 Hubbell to New York. We had lunch. I took him the

14 headquarters of McAndrews & Forbes at 62nd Street. I

15 introduced him to Howard Gittis, Ronald Perelman, and I

16 left.

17 Q And did, subsequently, Mr. Hubbell obtain

18 consulting contracts with Revlon?

19 A Subsequently, Mr. Hubbell was hired, as I

20 understand it, as outside counsel to McAndrews & Forbes, or

21 Revlon, or some entity within the Perelman empire.

22 Q And was that consulting contracts of about

23 $100,000 a year?

24 A I--I think so, I think so.

25 Q And did you make other contacts with other

1 companies in which you had friends for assistance for Webb
2 Hubbell?
3 A I did not.
4 Q And was the effort to assist Mr. Webb Hubbell
5 during this time--was it after he left the Department of
6 Justice and prior to the time that he pled guilty to
7 criminal charges?
8 A That is correct.
9 Q And at the time you assisted Webb Hubbell by
10 securing a job with Revlon for him, was he a potential
11 adverse witness to the President in the ongoing
12 investigation by the Independent Counsel?
13 A I don't know whether he was an adverse witness or
14 not. What he was was my friend who had just resigned from
15 the Justice Department, and he was out of work, and he asked
16 for help, and I happily helped him.
17 Q And did you know at the time that he was a
18 potential witness in the investigation by the OIC?
19 A I don't know whether I knew whether he was a
20 potential witness or not. I simply responded to Webb
21 Hubbell who was a friend in trouble and needing work.
22 Q Now, let's backtrack to the time when you first
23 had any contact with Ms. Lewinsky. We've talked about this
24 January 20-21st meeting with Mr. Gittis and covered a little
25 bit of the tail end of this entire episode. Now I would

1 like to go back in time to your first meetings with Ms.
2 Lewinsky.
3 Now, when was the first time that you recall that
4 you met with Monica Lewinsky?
5 A If you've read my grand jury testimony--
6 Q I have.
7 A --and I'm sure that you have--there is testimony
8 in the grant jury that she came to see me on or about the
9 5th of November. I have no recollection of that. It was
10 not on my calendar, and I just have no recollection of her
11 visit. There is a letter here that you have in evidence,
12 and I have to assume that in fact that happened. But as I
13 said in my grand jury testimony, I'm not aware of it, I
14 don't remember it--but I do not deny that it happened.
15 Q And Ms. Lewinsky has made reference to a meeting
16 that occurred in your office on November 5, and that's the
17 meeting that you have no recollection of?
18 A That is correct. We have no record of it in my
19 office, and I just have no recollection of it.
20 Q And in your first grand jury appearance, you were
21 firm, shall I say, that the first time you met with Ms.
22 Lewinsky, that it was on December 11th?
23 A Yes. It was firm based on what my calendar told
24 me, and subsequently to that, there has been a refreshing of
25 my recollection, and I do not deny that it happened. By the

1 same token, I will tell you, as I said in my grand jury
2 testimony, that I did not remember that I had met with her.
3 Q And in fact today, the fact that you do not
4 dispute that that meeting occurred is not based upon your
5 recollection but is simply based upon you've seen the
6 records, and it appears that that meeting occurred?
7 A That is correct.
8 Q Okay. And you've made reference to my first
9 exhibit there, which is front of you, and I would refer you
10 to this at this time, which is Exhibit 86.
11 Now, this is captioned as a "Letter from Ms.
12 Lewinsky to Mr. Vernon Jordan dated November 6, 1997," and
13 it appears that this letter thanks you for meeting with her
14 in reference to her job search. And do you recall this--
15 MR. KENDALL: Mr. Hutchinson, excuse me. May I
16 ask--this is an unsigned copy. Do you have a signed copy of
17 this letter?
18 MR. HUTCHINSON: Let me go through my questions if
19 I might.
20 BY MR. HUTCHINSON:
21 Q Do you recall receiving this letter?
22 A I do not.
23 Q Do you ever recall seeing this letter before?
24 A The first time I saw this letter was when I was
25 before the grand jury.

1 Q And am I correct that it's your testimony that the
2 first time you ever recall hearing the name "Monica
3 Lewinsky" was in early December of '97?
4 A That's correct. I--I may have heard the name
5 before, but the first time I remember seeing her and having
6 her in my presence was then.
7 Q Well, regardless of whether you met with her in
8 November or not, the fact is you did not do anything in
9 November to secure a job for Ms. Lewinsky until your
10 activities on December 11 of '97?
11 A I think that's correct.
12 Q And on December 11, I think you made some calls
13 for Ms. Lewinsky on that particular day?
14 A I believe I did. I have some--it's all right for
15 me to refresh my recollection?
16 Q Certainly.
17 A Thank you. [Perusing documents.] I did make
18 calls for her on the 11th, yes.
19 Q And may I just ask what you're referring to?
20 A I'm referring here to telephone logs prepared by
21 counsel here for me to refresh my recollection about calls.
22 MR. HUNDLEY: You are welcome to have a copy of
23 that.
24 THE WITNESS: You are welcome to see it.
25 MR. HUTCHINSON: Do you have an extra copy?

1 THE WITNESS: Yes--in anticipation.

2 MR. HUNDLEY: There are a few calls.

3 SENATOR THOMPSON: Might this be a good time to

4 take a 5-minute break?

5 MR. HUTCHINSON: Certainly.

6 SENATOR THOMPSON: All right. Let's adjourn for 5

7 minutes.

8 THE VIDEOGRAPHER: We are going off the record at

9 10:03 a.m.

10 [Recess.]

11 THE VIDEOGRAPHER: We're going back on the record

12 at 10:16 a.m.

13 SENATOR THOMPSON: All right. Counsel has

14 consumed 38 minutes.

15 Counsel, would you proceed?

16 MR. HUTCHINSON: Thank you, Senator Thompson.

17 At this time, I would offer as Jordan Deposition

18 Exhibit 86, if you don't mind me going by that numerology--

19 SENATOR THOMPSON: Would it be better to do that

20 or make it Jordan Exhibit Number 1? Does counsel have any

21 preference on that--is that--

22 MR. HUTCHINSON: One is fine.

23 SENATOR THOMPSON: Let's do it that way. It will

24 be made a part of the record, Jordan Deposition Number 1.

25 [Jordan Deposition Exhibit No.

1 marked for identification.]

BY MR. HUTCHINSON:

Q Mr. Jordan, let me go back to that meeting on December 11th. I believe we were discussing that. My question would be: How did the meeting on December 11 of 1997 with Ms. Lewinsky come about?

A Ms. Lewinsky called my office and asked if she could come to see me.

Q And was that preceded by a call from Betty Currie?

A At some point in time, Betty Currie had called me, and Ms. Lewinsky followed up on that call, and she came to my office, and we had a visit.

Q Ms. Lewinsky called, set up a meeting, and at some point sent you a resume, I believe.

A I believe so.

Q And did you receive that prior to the meeting on December 11th?

A I--I have to assume that I did, but I--I do not know whether she brought it with her or whether--it was at some point that she brought with her or sent to me--somehow it came into my possession--a list of various companies in New York with which she had--which were here preferences, by the way--most of which I did not know well enough to make any calls for.

Q All right. And I want to come back to that, but I

46

1 believe--would you dispute if the record shows that you
2 received the resume of Ms. Lewinsky on December 8th?
3 A I would not.
4 Q And presumably, the meeting on December 11th was
5 set up somewhere around December 8th by the call from Ms.
6 Lewinsky?
7 A I--I would not dispute that, sir.
8 Q All right. Now, you mentioned that she had sent
9 you a--I guess some people refer to it--a wish list, or a
10 list of jobs that she--
11 A Not jobs--companies.
12 Q --companies that she would be interested in
13 seeking employment with.
14 A That's correct.
15 Q And you looked at that, and you determined that
16 you wanted to go with your own list of friends and companies
17 that you had better contacts with.
18 A I'm sure, Congressman, that you too have been in
19 this business, and you do know that you can only call people
20 that you know or feel comfortable in calling.
21 Q Absolutely. No question about it. And let me
22 just comment and ask your response to this, but many times I
23 will be listed as a reference, and they can take that to any
24 company. You might be listed as a reference and the name
25 "Vernon Jordan" would be a good reference anywhere, would it

1 not?
2 A I would hope so.
3 Q And so, even though it was a company that you
4 might not have the best contact with, you could have been
5 helpful in that regard?
6 A Well, the fact is I was running the job search,
7 not Ms. Lewinsky, and therefore, the companies that she
8 brought or listed were not of interest to me. I knew where
9 I would need to call.
10 Q And that is exactly the point, that you looked at
11 getting Ms. Lewinsky a job as an assignment rather than just
12 something that you were going to be a reference for.
13 A I don't know whether I looked upon it as an
14 assignment. Getting jobs for people is not unusual for me,
15 so I don't view it as an assignment. I just view it as
16 something that is part of what I do.
17 Q You're acting in behalf of the President when you
18 are trying to get Ms. Lewinsky a job, and you were in
19 control of the job search?
20 A Yes.
21 Q Now, going back--going to your meeting that we're
22 talking about on December 11th, prior to the meeting did you
23 make any calls to prospective employers in behalf of Ms.
24 Lewinsky?
25 A I don't think so. I think not. I think I wanted

1 to see her before I made any calls.
2 Q And so if they were not before, after you met with
3 her, you made some calls on December 11th?
4 A I--I believe that's correct.
5 Q And you called Mr. Richard Halperin of McAndrews &
6 Forbes?
7 A That's right.
8 Q You called Mr. Peter--
9 A Georgescu.
10 Q --Georgescu. And he is with what company?
11 A He is chairman and chief executive officer of
12 Young & Rubicam, a leading advertising agency on Madison
13 Avenue.
14 Q And did you make one other call?
15 A Yes. I called Ursie Fairbairn, who runs Human
16 Resources at American Express, at the American Express
17 Company, where I am the senior director.
18 Q All right. And so you made three calls on
19 December 11th. You believe that they were after you met
20 with Ms. Lewinsky--
21 A I doubt very seriously if I would have made the
22 calls in advance of meeting her.
23 Q And why is that?
24 A You sort of have to know what you're talking
25 about, who you're talking about.

1 Q And what did you basically communicate to each of
2 these officials in behalf of Ms. Lewinsky?
3 A I essentially said that you're going to hear from
4 Ms. Lewinsky, and I hope that you will afford her an
5 opportunity to come in and be interviewed and look favorably
6 upon her if she meets your qualifications and your needs for
7 work.
8 Q Okay. And at what level did you try to communicate
9 this information?
10 A By--what do you mean by "what level"?
11 Q In the company that you were calling, did you call
12 the chairman of human resources, did you call the CEO--who
13 did you call, or what level were you seeking to talk to?
14 A Richard Halperin is sort of the utility man; he
15 does everything at McAndrews & Forbes. He is very close to
16 the chairman, he is very close to Mr. Gittis. And so at
17 McAndrews & Forbes, I called Halperin.
18 As I said to you, and as my grand jury testimony
19 shows, I called Young & Rubicam, Peter Georgescu as its
20 chairman and CEO. I have had a long-term relationship with
21 Young & Rubicam going back to three of its CEOs, the first
22 being Edward Ney, who was chairman of Young & Rubicam when I
23 was head of the United Negro College Fund, and it was during
24 that time that we developed the great theme, "A mind is a
25 terrible thing to waste." So I have had a long-term

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1 relationship with Young & Rubicam and with Peter Georgescu,
2 so I called the chairman in that instance.
3 At American Express, I called Ms. Ursie Fairbairn
4 who is, as I said before, in charge of Human Resources.
5 So that is the level--in one instance, the
6 chairman; in one instance a utilitarian person; and in
7 another instance, the head of the Human Resources
8 Department.
9 Q And the utilitarian connection, Mr. Richard
10 Halperin, was sort of an assistant to Mr. Ron Perelman?
11 A That's correct. He's a lawyer.
12 Q Now, going to your meeting on December 11th with
13 Ms. Lewinsky, about how long of a meeting was that?
14 A I don't--I don't remember. You have a record of
15 it, Congressman.
16 Q And actually, I think you've testified it was
17 about 15 to 20 minutes, but don't hold me to that, either.
18 During the course of the meeting with Ms.
19 Lewinsky, what did you learn about her?
20 A Uh, enthusiastic, quite taken with herself and her
21 experience, uh, bubbly, effervescent, bouncy, confident, uh-
22 -actually, I sort of had the same impression that you House
23 Managers had of her when you met with her. You came out and
24 said she was impressive, and so we come out about the same
25 place.

1 Q And did she relate to you the fact that she liked
2 being an intern because it put her close to the President?
3 A I have never seen a White House intern who did not
4 like being a White House intern, and so her enthusiasm for
5 being a White House intern was about like the enthusiasm of
6 White House interns--they liked it.
7 She was not happy about not being there anymore--
8 she did not like being at the Defense Department--and I
9 think she actually had some desire to go back. But when she
10 actually talked to me, she wanted to go to New York for a
11 job in the private sector, and she thought that I could be
12 helpful in that process.
13 Q Did she make reference to someone in the White
14 House being uncomfortable when she was an intern, and she
15 thought that people did not want her there?
16 A She felt unwanted--there is no question about
17 that. As to who did not want her there and why they did not
18 want her there, that was not my business.
19 Q And she related that--
20 A She talked about it.
21 Q --experience or feeling to you?
22 A Yes.
23 Q Now, your meeting with Ms. Lewinsky was on
24 December 11th, and I believe that Ms. Lewinsky has testified
25 that she met with the President on December 5--excuse me, on

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1 December 6--at the White House and complained that her job
2 search was not going anywhere, and the President then talked
3 to Mr. Jordan.
4 Do you recall the President talking to you about
5 that after that meeting?
6 A I do not have a specific recollection of the
7 President saying to me anything about having met with Ms.
8 Lewinsky. The President has never told me that he met with
9 Ms. Lewinsky, as best as I can recollect. I--I am aware
10 that she was in a state of anxiety about going to work. She
11 was in a state of anxiety in addition because her lease at
12 Watergate, at the Watergate, was to expire December 31st.
13 And there was a part of Ms. Lewinsky, I think, that thought
14 that because she was coming to me, that she could come today
15 and that she would have a job tomorrow. That is not an
16 unusual misapprehension, and it's not limited to White House
17 interns.
18 Q I mentioned her meeting with the President on the
19 same day, December 6th. I believe the record shows the
20 President met with his lawyers and learned that Ms. Lewinsky
21 was on the Jones witness list. Now, did you subsequently
22 meet with the President on the next day, December 7th?
23 A I may have met with the President. I'd have to--I
24 mean, I'd have to look. I'd have to look. I don't know
25 whether I did or not.

1 Q If you would like to confer--I believe the record
2 shows that, but I'd like to establish that through your
3 testimony.
4 MS. WALDEN: Yes.
5 THE WITNESS: Yes.
6 BY MR. HUTCHINSON:
7 Q All right. So you met with the President on
8 December 7th. And was it the next day after that, December
9 8th, that Ms. Lewinsky called to set up the job meeting with
10 you on December 11th?
11 A I believe that is correct.
12 Q And sometime after your meeting on December 11th
13 with Ms. Lewinsky, did you have another conversation with
14 the President?
15 A Uh, you do understand that conversations between
16 me and the President, uh, was not an unusual circumstance.
17 Q And I understand that--
18 A All right.
19 Q --and so let me be more specific. I believe your
20 previous testimony has been that sometime after the 11th,
21 you spoke with the President about Ms. Lewinsky.
22 A I stand on that testimony.
23 Q All right. And so there's two conversations after
24 the witness list came out--one that you had with the
25 President on December 7th, and then a subsequent

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1 conversation with him after you met with Ms. Lewinsky on the
2 11th.
3 Now, in your subsequent conversation after the
4 11th, did you discuss with the President of the United
5 States Monica Lewinsky, and if so, can you tell us what that
6 discussion was?
7 A If there was a discussion subsequent to Monica
8 Lewinsky's visit to me on December the 11th with the
9 President of the United States, it was about the job search.
10 Q ~~All right.~~ And during that, did he indicate that
11 he knew about the fact that she had lost her job in the
12 White House, and she wanted to get a job in New York?
13 A He was aware that--he was obviously aware that she
14 had lost her job in the White House, because she was working
15 at the Pentagon. He was also aware that she wanted to work
16 in New York, in the private sector, and understood that
17 that is why she was having conversations with me. There is
18 no doubt about that.
19 Q And he thanked you for helping her?
20 A There's no question about that, either.
21 Q And on either of these conversations that I've
22 referenced that you had with the President after the witness
23 list came out, your conversation on December 7th, and your
24 conversation sometime after the 11th, did the President tell
25 you that Ms. Monica Lewinsky was on the witness list in the

1 Jones case?

2 A He did not.

3 Q And did you consider this information to be

4 important in your efforts to be helpful to Ms. Lewinsky?

5 A I never thought about it.

6 Q Was there a time that you became aware that Ms.

7 Lewinsky had been subpoenaed to give a deposition in the

8 Jones versus Clinton case?

9 A On December 19th when she came to my office with

10 the subpoena--I think it's the 19th.

11 Q That's right. Now, you indicated you never

12 thought about it, because of course, at that point, you

13 didn't know that she was on the witness list, according to

14 your testimony.

15 A [Nodding head up and down.]

16 Q Now, you said that she came to see you on December

17 19th--I'm sorry. I've been informed you didn't respond out

18 loud, so--

19 A Well, if you'd ask the question, I'd be happy to

20 respond.

21 Q I was afraid you would ask me to ask the question

22 again.

23 Well, let's go to the December 19th meeting.

24 A Fine.

25 Q How did it come about that you met with Ms.

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Lewinsky on December 19th?

A Ms. Lewinsky called me in a rather high emotional state and said that she needed to see me, and she came to see me.

Q And she called you on the telephone on December 19th, in which she indicated she had received a subpoena?

A That's right, and was emotional about it and asked, and so I said come over.

Q all right. And what was your reaction to her having received a subpoena in the Jones case?

A Surprise, number one; number two, quite taken with her emotional state.

Q And did you see that she had a problem?

A She obviously had a problem--she thought--

THE VIDEOGRAPHER: We have to go off the record.

SENATOR THOMPSON: Off the record.

[Recess due to power failure.]

THE VIDEOGRAPHER: We're going back on the record at 10:49 a.m.

SENATOR THOMPSON: All right, let the record reflect that we've been down for 20 to 25 minutes due to a power failure, but we are ready to proceed now, counsel.

MR. HUTCHINSON: Thank you, Senator Thompson.

And Mr. Jordan, before we go back to my line of questioning, I have been informed that we have that question

in which we did not get an audible response, and so I'm going to ask the court reporter to read that question back.

[The court reporter read back the requested portion of the record.]

THE WITNESS: I did not know that she was on the witness list, Congressman. And let me say parenthetically here that our side had nothing to do with the power outage.

[Laughter.]

THE WITNESS: As desirable as that may have been.

[Laughter.]

BY MR. HUTCHINSON:

Q Thank you, Mr. Jordan. And again, we're talking about the fact you never thought about the President not telling you that Ms. Lewinsky was on the witness list because you didn't know it at the time.

A I--I did not know it.

Q ~~All right.~~ Now, before we go back to December 19th, I've also been informed that I've been neglectful, and sometimes you will give a nod of the head, and I've not asked you to give an audible response, and so I'm going to try to be mindful of that, but at the same time, Mr. Jordan, if you can try to give an audible response to a question rather than what we sometimes do in private conversation, which is a nod of the head. Fair enough?

A I'm happy to comply.

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1 Q Now, we're talking about December 19th, that you
2 had received a call from Monica Lewinsky; she had been
3 subpoenaed in the Jones case. She was upset. You said,
4 Come to my office.
5 Now, when she got to the office, I asked you,
6 actually, before that, what was your reaction to her having
7 this subpoena, and she had a problem because of ~~the~~ a
8 subpoena.
9 A Yes.
10 Q And I believe you previously indicated that any
11 time a witness gets a subpoena, they've got a problem that
12 they would likely need legal assistance.
13 A That's been my experience.
14 Q And in fact she did subsequently come to see you
15 at the office on that December 19th, is that correct?
16 A That's correct.
17 Q And what happened at that meeting in your office
18 with Ms. Lewinsky on the 19th?
19 A She, uh, as I said, was quite emotional. She was-
20 -she was disturbed about the subpoena. She was disturbed
21 about not having, in her words, heard from the President or
22 talked to the President.
23 It was also in that meeting that it became clear
24 to me that the--that her eyes were wide and that she, uh,
25 that--let me--for lack of a better way to put it, that she

1 had a "thing" for the President.
2 Q And how long was that meeting?
3 A I don't know, uh, but it's in the record.
4 MR. HUNDLEY: You testified 45 minutes.
5 THE WITNESS: Forty-five minutes. Thank you.
6 MR. HUTCHINSON: Thank you.
7 MR. HUNDLEY: Is that okay if I--
8 MR. HUTCHINSON: That's all right, and that's
9 helpful, Mr. Hundley.
10 MR. HUNDLEY: Thank you. I'm trying to be
11 helpful.
12 BY MR. HUTCHINSON:
13 Q And during this meeting, did she in fact show you
14 the subpoena that she had received in the Jones litigation?
15 A I'm sure she showed me the subpoena.
16 Q And the subpoena that was presented to you asked
17 her to give a deposition, is that correct?
18 A As I recollect.
19 Q But did it also ask Ms. Lewinsky or direct her to
20 produce certain documents and tangible objects?
21 A I think, if I'm correct in my recollection, it
22 asked that she produce gifts.
23 Q Gifts, and some of those gifts were specifically
24 enumerated.
25 A I don't remember that. I do remember gifts.

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1 Q And did you discuss any of the items requested
2 under the subpoena?
3 A I did not. What I said to her was that she needed
4 counsel.
5 Q Now, just to help you in reference to your
6 previous grand jury testimony of March 3, '98--and if you
7 would like to refer to that, page 121, but I believe it was
8 your testimony that you asked her if there had been any
9 gifts after you looked at the subpoena.
10 A I may have done that, and if I--if that's in my
11 testimony, I stand by it.
12 Q And did she--from your conversation with her, did
13 you determine that in your opinion, there was a fascination
14 on her part with the President?
15 A No question about that.
16 Q And I think you previously described it that she
17 had a "thing" for the President?
18 A "Thing," yes.
19 Q And did you make any specific inquiry as to the
20 nature of the relationship that she had with the President?
21 A Yes. At some point during that conversation, I
22 asked her directly if she had had sexual relationships with
23 the President.
24 Q And is this not an extraordinary question to ask a
25 24-year-old intern, whether she had sexual relations with

1 the President of the United States?

2 A Not if you see--not if you had witnessed her

3 emotional state and this "thing," as I say. It was not.

4 Q And her emotional state and what she expressed to

5 you about her feelings for the President is what prompted

6 you to ask that question?

7 A That, plus the question of whether or not the

8 President at the end of his term would leave the First Lady;

9 and that was alarming and stunning to me.

10 Q And she related that question to you in that

11 meeting on December 19th?

12 A That's correct.

13 Q Now, going back to the question in which you asked

14 her if she had had a sexual relationship with the President,

15 what was her response?

16 A No.

17 Q And I'm sure that that was not an idle question on

18 your part, and I presume that you needed to know the answer

19 for some purpose.

20 A I wanted to know the answer based on what I had

21 seen in her expression; obviously, based on the fact that

22 this was a subpoena about her relationship with the

23 President.

24 Q And so you felt like you needed to know the answer

25 to that question to determine how you were going to handle

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1 the situation?

2 A No. I thought it was a factual data that I needed

3 to know, and I asked the question.

4 Q And why did you need to know the answer to that

5 question?

6 A I am referring this lady, Ms. Lewinsky, to various

7 companies for jobs, and it seemed to me that it was

8 important for me to know in that process whether or not

9 there had been something going on with the President based

10 on what I saw and based on what I heard.

11 Q And also based upon your years of experience--I

12 mean your--

13 A I don't understand that question.

14 Q Well, you have children?

15 A I have four children; six grandchildren.

16 Q And you've raised kids, you've had a lot of

17 experiences in life, and do you not apply that knowledge and

18 experience and wisdom to circumstances such as this?

19 A Yes. I've been around, and I've seen young

20 people, both men and women, overly excited about older,

21 mature, successful individuals, yes.

22 Q Now, let me just go back as to what signals that

23 you might have had at this particular point that there was a

24 sexual relationship between Ms. Lewinsky and the President.

25 Was one of those the fact that she indicated that she had a

1 fascination with the President?
2 A Yes.
3 Q And did she relate that "He doesn't call me
4 enough"?
5 A Yes.
6 Q And was the fact that there was an exchange of
7 gifts a factor in your consideration?
8 A Well, I was not aware that there had been an
9 exchange of gifts. I thought it a tad unusual that there
10 would be an exchange of gifts, uh, but it was just clear
11 that there was a fixation by this young woman on the
12 President of the United States.
13 Q And was it also a factor that she had been issued
14 a subpoena in a case that was rooted in sexual harassment?
15 A Well, it certainly helped.
16 Q And that was an ingredient that you factored in
17 and decided this is a question that needed to be asked?
18 A There's no question about that.
19 Q Now, heretofore, the questions or the discussions
20 with Ms. Lewinsky had simply been about a job?
21 A Had been about a job.
22 Q And I think you indicated that you didn't have to
23 be an Einstein to know that this was a question that needed
24 to be asked after what you learned on this meeting?
25 A Yes, based on my own judgment, that is correct.

1 Q Now, at this point, you're assisting the President
2 in obtaining a job for a former intern, Monica Lewinsky?
3 A Right.
4 Q It comes to your attention from Ms. Lewinsky that
5 she has a subpoena in a civil rights case against the
6 President. And did this make you consider whether it was
7 appropriate for you to continue seeking a job for Ms.
8 Lewinsky?
9 A Never gave it a thought.
10 Q Despite the fact that you were seeking the job for
11 Ms. Lewinsky at the request of the President when she is
12 under subpoena in a case adverse to the President?
13 A I--I did not give it a thought. I had committed
14 that I was going to help her, and I was going to--and I kept
15 my commitment.
16 Q And so, however she would have answered that
17 question, you would have still prevailed upon your friends
18 in industry to get a job for her?
19 A Congressman, that is a hypothetical question, and
20 I'm not going to answer a hypothetical question.
21 Q Well, I thought you had answered it before, but
22 if--so you don't know whether it would have made a
23 difference or not, then?
24 A I asked her whether or not she had had sexual
25 relationships with the President. Ms. Lewinsky told me no.

1 MR. HUNDLEY: I'd just like to interject. My
2 recollection, Congressman, is that in the grand jury, he
3 gave basically the same answer, that it was a hypothetical
4 question, and that he really didn't know what he would have
5 done had the answer been different. You could double-check
6 it if you want, but I'm sure I'm right.
7 BY MR. HUTCHINSON:
8 Q Okay, I'm not asking you a hypothetical question.
9 I want to ask it in this phrase, in this way. Did her
10 answer make you consider whether it was appropriate for you
11 to continue seeking a job for Ms. Lewinsky at the request of
12 the President?
13 A I did not see any reason why I should not continue
14 to help her in her job search.
15 Q Now, was the fact that she was under subpoena
16 important information to you?
17 A It was additional information, certainly.
18 Q If you were trying to get Ms. Lewinsky a job, did
19 you expect her to tell you if she had any reason to believe
20 she might be a witness in the Jones case?
21 A She did in fact tell me by showing me the
22 subpoena. I had no expectations one way or the other.
23 Q Well, I refer you to your grand jury testimony of
24 March 3, '98 at page 96. Do you recall the answer: "I just
25 think that as a matter of openness and full disclosure that

1 she would have done that."
2 A And she did.
3 Q Precisely. She disclosed to you, of course, when
4 she received the subpoena, and that's information that you
5 expected to know and to be disclosed to you?
6 A Fine.
7 Q Is--
8 A Yes. Fine.
9 Q And in fact, if Ms. Currie--I'm talking about
10 Betty Currie--if she had known that Ms. Lewinsky was under
11 subpoena, you would have expected her to tell you that
12 information as well since you were seeking employment for
13 Ms. Lewinsky?
14 A Well, it would have been fine had she told me. I
15 do make a distinction between being a witness on the one
16 hand and being a defendant in some sort of criminal action
17 on the other. She was a witness in the civil case, and I
18 don't believe witnesses in civil cases don't have a right
19 for--to employment.
20 Q Okay. I refer you to page 95 of your grand jury
21 testimony, in which you said: "I believe that had Ms.
22 Currie known, that she would have told me."
23 And the next question: "Let me ask the question
24 again, though. Would you have expected her to tell you if
25 she knew?"

1 And do you recall your answer?
2 A I don't.
3 Q "Yes, sure."
4 A I stand by that answer.
5 Q And so it's your testimony that if Ms. Currie had
6 known that Ms. Lewinsky was under subpoena, you would have
7 expected her to tell you that information?
8 A It would have been helpful.
9 Q And likewise, would you have expected the
10 President to tell you if he had any reason to believe that
11 Ms. Lewinsky would be called as a witness in the Paula Jones
12 case?
13 A That would have been helpful, too.
14 Q And that was your expectation, that he would have
15 done that in your conversations?
16 A It--it would certainly have been helpful, but it
17 would not have changed my mind.
18 Q Well, being helpful and that being your
19 expectation is a little bit different, and so I want to go
20 back again to your testimony on March 3, page 95, when the
21 question is asked to you--question: "If the President had
22 any reason to believe that Ms. Lewinsky could be called a
23 witness in the Paula Jones case, would you have expected him
24 to tell you that when you spoke with him between the 11th
25 and the 19th about her?"

1 And your answer: "And I think he would have."
2 A My answer was yes in the grand jury testimony, and
3 my answer is yes today.
4 Q All right. So it would have been helpful, and it
5 was something you would have expected?
6 A Yes.
7 Q And yet, according to your testimony, the
8 President did not so advise you of that fact in the
9 conversations that he had with you on December 7th and
10 December 11th after he learned that Ms. Lewinsky was on the
11 witness list?
12 A As I testified--
13 MR. KENDALL: Objection. Misstates the record
14 with regard to December 11th.
15 MR. HUTCHINSON: I--I will restate the question.
16 I believe it accurately reflects the record, and I'll ask
17 the question.
18 BY MR. HUTCHINSON:
19 Q And yet, according to your testimony, the
20 President did not so advise you of the fact that Ms.
21 Lewinsky was on the witness list despite the fact that he
22 had conversations with you on two occasions, on December 7th
23 and December 11th?
24 A I have no recollection of the President telling me
25 about the witness list.

1 Q And during this meeting with Ms. Lewinsky on the
2 11th, did you take some action as a result of what she told
3 you?
4 A On the 11th or the 18th?
5 Q Excuse me. I'm sorry. Let me go to the 19th.
6 A Nineteenth.
7 Q Thank you for that correction.
8 Did you refer her to an attorney?
9 A Yes, I did.
10 Q ~~Okay.~~ And who was the attorney that you referred
11 her to?
12 A Frank Carter, a very able local attorney here.
13 Q And did you give her two or three attorneys to
14 select from, or did you just give her one recommendation?
15 A I made a recommendation of Frank Carter. That was
16 the only recommendation.
17 Q Now, let me go to I believe it's the next three
18 exhibits that are in front of you, if you'd just turn that
19 first page, and I believe they are marked 29, 31, 32 and 33.
20 And these are, I believe, exhibits that you have seen before
21 and are summaries and documents relating to telephone
22 conversations on this particular day of December 19th.
23 [Witness perusing documents.]
24 SENATOR DODD: How are these going to be marked--
25 as Jordan Deposition Exhibits--

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1 MR. HUTCHINSON: These should be marked as
2 Exhibits 2, 3, and 4.
3 SENATOR DODD: Okay.
4 MR. KENDALL: Excuse me, Mr. Manager. Are you
5 offering these in evidence?
6 MR. HUTCHINSON: Not at this time.
7 I guess it's 2, 3, 4 and 5.
8 SENATOR THOMPSON: Are we referring to the next
9 four exhibits in the package here?
10 MR. HUTCHINSON: Yes, sir.
11 SENATOR THOMPSON: Well, we'll just--identify them
12 one at a time, and we'll--
13 MR. HUTCHINSON: All right.
14 BY MR. HUTCHINSON:
15 Q Let's go to Exhibit 29 as it's marked, but for our
16 purpose, we're going to refer to it as Deposition Exhibit 2.
17 SENATOR THOMPSON: All right. For identification
18 for right now, we'll call that Jordan Exhibit Number 2 for
19 identification, which is marked as, I assume, Grand Jury
20 Exhibit Number 29.
21 [Jordan Deposition Exhibit No.
22 2 marked for identification.]
23 BY MR. HUTCHINSON:
24 Q And from this record, would you agree that you
25 received a call from Ms. Lewinsky at 1:47 p.m.?

1 A For 11 seconds.

2 Q All right. And subsequent to that, you placed a
3 call to talk to the President at 3:51 p.m. and talked to
4 Deborah Schiff?

5 A Yes.

6 Q And what was the purpose of that call to Deborah
7 Schiff?

8 A I--I'm certain that I did not call Deborah Schiff.
9 I had no reason to call Deborah Schiff. My suspicion was
10 that if I in fact called 1414, that somehow Deborah Schiff
11 was answering the telephone.

12 Q Were you trying to get hold of the President?

13 A I think maybe I was.

14 Q All right. And then, subsequent to that, Ms.
15 Lewinsky arrived in your office at 4:47 p.m.--and I believe
16 that would be reflected on Exhibit 3--excuse me--Exhibit 4.

17 MR. HUNDLEY: Four.

18 THE WITNESS: Yes.

19 BY MR. HUTCHINSON:

20 Q And does it also reflect, going back to the call
21 records, that you talked to the President during the course
22 of your meeting with Ms. Lewinsky at approximately 5:01
23 p.m.?

24 A I beg your pardon?

25 MR. HUTCHINSON: This would be Exhibit 5.

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1 SENATOR THOMPSON: All right. Let's mark these
2 for identification purposes.
3 We have already identified Deposition Exhibit
4 Number 29 as Exhibit Number 2 for identification in Mr.
5 Jordan's deposition.
6 The next one would be Grand Jury Exhibit Number
7 31, and we will mark that as Exhibit Number 3 for
8 identification purposes. Following that will be Grand Jury
9 Exhibit Number 32, that we will identify as Exhibit Number 4
10 to Mr. Jordan's deposition for identification purposes; and
11 Grand Jury Exhibit Number 33 will be Exhibit Number 5 to Mr.
12 Jordan's deposition for identification purposes.
13 Now, do we need to go any further at this time?
14 MR. HUTCHINSON: No. Thank you.
15 SENATOR THOMPSON: All right.
16 [Jordan Deposition Exhibit
17 Nos. 3, 4 and 5 marked for
18 identification.]
19 BY MR. HUTCHINSON:
20 Q Mr. Jordan--
21 A Yes.
22 Q --under Exhibit--
23 A Yes.
24 Q --according to these records, specifically Exhibit
25 5, does it reflect that you talked to the President during

1 the course of your meeting with Ms. Lewinsky at
2 approximately 5:01 p.m.?
3 MR. KENDALL: Object to the form of the question.
4 MR. HUTCHINSON: You may answer.
5 THE WITNESS: I'm confused.
6 MR. HUTCHINSON: There's an objection as to the
7 form of the question.
8 THE WITNESS: Oh.
9 SENATOR THOMPSON: We can resolve it.
10 MR. KENDALL: The question was do these records
11 indicate this. If he offers Number 2, I'm going to object
12 to it. It's not the best evidence. It's a chart. I don't
13 know who prepared it--
14 SENATOR THOMPSON: He's referring to 5 now, I
15 believe, isn't he?
16 MR. HUTCHINSON: Yes.
17 SENATOR THOMPSON: I believe this had to do with
18 5.
19 MR. HUTCHINSON: All right.
20 THE WITNESS: Would you ask your question?
21 BY MR. HUTCHINSON:
22 Q Mr. Jordan, I'm simply trying to establish, and
23 using Exhibit 5 to refresh your recollection--
24 MR. KENDALL: I withdraw the objection, I withdraw
25 the objection.

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1 SENATOR THOMPSON: All right, sir; very fine.
2 MR. HUTCHINSON: Thank you.
3 BY MR. HUTCHINSON:
4 Q --that this record, Exhibit 5, reflects that you
5 talked to the President during the course of your meeting
6 with Ms. Lewinsky at approximately 5:01 p.m.
7 A Yes. I--I have never had a conversation with the
8 President while Ms. Lewinsky was present. The wave-in sheet
9 from my office said that she came in at 5:47--
10 Q Four forty-seven.
11 A --4:47. She may have been in the reception area,
12 or she may have been outside my office, but Ms. Lewinsky was
13 not in my office during the time that I had a conversation
14 with the President.
15 Q And the other alternative would be that she came
16 into your office, and then you excused her while you
17 received a call from the President?
18 A That's a possibility, too--
19 Q All right.
20 A --but she was not present in my office proper
21 during the time that I was having a conversation with the
22 President.
23 Q Absolutely, and that is clear.
24 Now, because we got a little bogged down in the
25 records, let me just go back for a moment. Is it your

1 understanding, based upon the records and recollection, that
2 you received a call from Ms. Lewinsky about 1:47; you talked
3 to Deborah Schiff trying to get hold of the President about
4 3:51 that afternoon; Ms. Lewinsky arrived at about 4:47 p.m.
5 A Yes.
6 Q Am I correct so far?
7 A Yes.
8 Q And then you received a call from the President at
9 about 5:01 p.m.?
10 A That's correct.
11 MR. HUTCHINSON: I want to say "Your Honor"--I've
12 wanting to do this all day, Senator--I would offer these
13 Exhibits 2, 3, 4 and 5 at this time.
14 MR. KENDALL: I would object to the admission of
15 Exhibit Number 2.
16 SENATOR THOMPSON: Mr. Hutchinson, could you
17 identify what this exhibit is from?
18 MR. HUTCHINSON: Well, this exhibit is a summary
19 exhibited based upon the original records that establish
20 this. Now, we've established it clearly through the
21 testimony, so it's not of earth-shattering significance
22 whether this is in the record or not, because the witness
23 has established it.
24 SENATOR THOMPSON: All right. But this is a
25 compilation of what you contend--

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1 MR. HUTCHINSON: Yes.

2 SENATOR THOMPSON: --is otherwise in the record?

3 MR. HUTCHINSON: Yes.

4 SENATOR THOMPSON: Counsel, do we really have a

5 problem with that?

6 MR. KENDALL: Senator Thompson, I don't know who

7 prepared this or what records it's based on. I have not

8 objected to any of the original records, and I'll continue

9 my objection.

10 SENATOR THOMPSON: I'll sustain that. I think in light of that we

11 will sustain it, if Mr. Hutchinson thinks it's otherwise in

12 the record anyway, and not make an issue out of that.

13 So we will, then, make as a part of the record

14 Exhibits Numbers 3, 4 and 5 that have previously been

15 introduced for identification purposes; they will now be

16 made a part of the record.

17 MR. HUTCHINSON: Thank you, Senator.

18 [Jordan Deposition Exhibit

19 Nos. 3, 4 and 5 received in

20 evidence.]

21 BY MR. HUTCHINSON:

22 Q Now, Mr. Jordan, you indicated you had this

23 conversation with the President at about 5:01 p.m. out of

24 the presence of Ms. Lewinsky. Now, during this conversation

25 with the President, what did you tell the President in that

1 conversation?

2 A That Lewinsky--I'm sure I told him that Ms.

3 Lewinsky was in my office, in the reception area, that she

4 had a subpoena and that I was going to visit with her.

5 Q And did you advise the President as well that you

6 were going to recommend Frank Carter as an attorney?

7 A I may have.

8 Q And why was it necessary to tell the President

9 these facts?

10 A I don't know why it was not unnecessary to tell

11 him these facts. I was keeping him informed about what was

12 going on, and so I told him.

13 Q Why did you make the judgment that you should call

14 the President and advise him of these facts?

15 A I just thought he ought to know. He was

16 interested it--he was obviously interested in it--and I felt

17 some responsibility to tell him, and I did.

18 Q All right. And what was the President's response?

19 A He said thank you.

20 Q Subsequent to your conversation with the President

21 about Monica Lewinsky, did you advise Ms. Lewinsky of this

22 conversation with the President?

23 A I doubt it.

24 Q And if she indicates that she was not aware of

25 that conversation, would you dispute her testimony in that

1 regard?

2 A I would not.

3 Q And you say that you doubt it. Was there a reason

4 that you would not disclose to her the fact that you talked

5 to the President when she was the subject of that

6 conversation?

7 A No. I--I didn't feel any particular obligation to

8 tell her or not to tell her, but I did not tell her.

9 Q Now, we have discussed to a limited extent the

10 gifts that were mentioned in the subpoena in this discussion

11 that you had with Ms. Lewinsky. Did she in fact tell you

12 about the gifts she had received from the President?

13 A I think she told me that she had received gifts

14 from the President.

15 Q Did she also indicate that there had been an

16 exchange of gifts?

17 A She did.

18 Q And did you think that it was somewhat unusual

19 that there had been an exchange of gifts?

20 A Uh, a tad unusual, I thought.

21 Q These--

22 A Which again occasioned the question.

23 Q Pardon?

24 A Which again occasioned the ultimate question.

25 Q On--on whether there was a sexual relationship?

1 A That is correct.

2 Q And so that was a significant fact in determining

3 whether that question should be asked?

4 A It was an additional fact.

5 Q Now, the subpoena also references "documents

6 constituting or containing communications between you"--

7 which would have been Ms. Lewinsky under the subpoena--"and

8 the Defendant Clinton, including letters, cards, notes, et

9 cetera."

10 Did you ask Ms. Lewinsky at all whether there were

11 any kinds of cards or communications between them?

12 A Uh, I did not, but she may have volunteered that.

13 Q And did she tell you about telephone conversations

14 with the President?

15 A She did tell me that she and the President talked

16 on the telephone.

17 Q And did she express it in a way that it was

18 frustrating because the President didn't call her

19 sufficiently?

20 A Well, that--that is correct, and she was

21 disappointed, uh, and disapproving of the fact that she was

22 not hearing from the President of the United States on a

23 regular basis.

24 Q During this conversation with Ms. Lewinsky, she

25 also made reference to the First Lady?

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1 A Yes.

2 Q And that was another question of concern when she

3 asked if you thought that the President would leave the

4 First Lady at the end of his term?

5 A That is correct.

6 Q And what was your reaction to this statement?

7 A My reaction to the statement after I got over it

8 was that--no way.

9 Q Did it send off alarm bells in your mind as to her

10 relationship with the President?

11 A I think it's safe to say that she was not happy.

12 Q You're speaking of Ms. Lewinsky?

13 A That's the only person we're talking about,

14 Congressman.

15 Q Now, based upon all of this, was it your

16 conclusion the subpoena meant trouble?

17 A Beg your pardon?

18 Q Based upon all of these facts and your

19 conversation with Ms. Lewinsky, was it your conclusion that

20 the subpoena meant trouble?

21 A Well, I always, based on my experience with the

22 grand jury, believe that subpoenas are trouble.

23 Q I think you've used the language, "ipso facto"

24 meant trouble?

25 A Yes, yes, right.

1 Q Now, subsequent to your meeting with Ms. Lewinsky
2 on this occasion, did you in fact set up an appointment with
3 Mr. Frank Carter?
4 A Yes--for the 22nd, I believe.
5 Q Which I believe would have been the first part of
6 the next week?
7 A That's right.
8 Q And still on December 19th, after your meeting
9 with Ms. Lewinsky, did you subsequently see the President of
10 the United States later that evening?
11 A I did.
12 Q And is this when you went to the White House and
13 saw the President?
14 A Yes.
15 Q At the time that Ms. Lewinsky came to see you on
16 December 19th, did you have any plans to attend any social
17 function at the White House that evening?
18 A I did not.
19 Q And in fact there was a social invitation that you
20 had at the White House that you declined?
21 A I had--I had declined it; that's right.
22 Q And subsequent to Ms. Lewinsky visiting you, did
23 you change your mind and go see the President that evening?
24 A After the--a social engagement that Mrs. Jordan
25 and I had, we went to the White House for two reasons. We

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1 went to the White House to see some friends who were there,
2 two of whom were staying in the White House; and secondly, I
3 wanted to have a conversation with the President.
4 Q And this conversation that you wanted to have with
5 the President was one that you wanted to have with him
6 alone?
7 A That is correct.
8 Q And did you let him know in advance that you were
9 coming and wanted to talk to him?
10 A I told him I would see him sometime that night
11 after dinner.
12 Q Did you tell him why you wanted to see him?
13 A No.
14 Q Now, was this--once you told him that you wanted
15 to see him, did it occur the same time that you talked to
16 him while Ms. Lewinsky was waiting outside?
17 A It could be. I made it clear that I would come by
18 after dinner, and he said fine.
19 Q Now, let me backtrack for just a moment, because
20 whenever you talked to the President, Ms. Lewinsky was not
21 inside the room--
22 A That's correct.
23 Q --and therefore, you did not know the details
24 about her questions on the President might leave the First
25 Lady and those questions that set off all of these alarm

1 bells.

2 A [Nodding head up and down.]

3 Q And so you were having--is the answer yes?

4 A That's correct.

5 Q And so you were having this discussion with the

6 President not knowing the extent of Ms. Lewinsky's fixation?

7 A Uh--

8 Q Is that correct?

9 A Correct.

10 Q And, regardless, you wanted to see the President

11 that night, and so you went to see him. And was he

12 expecting you?

13 A I believe he was.

14 Q And did you have a conversation with him alone?

15 A I did.

16 Q No one else around?

17 A No one else around.

18 Q And I know that's a redundant question.

19 A It's okay.

20 Q Now, would you describe your conversation with the

21 President?

22 A We were upstairs, uh, in the White House. Mrs.

23 Jordan--we came in by way of the Southwest Gate into the

24 Diplomatic Entrance--we left the car there. I took the

25 elevator up to the residence, and Mrs. Jordan went and

1 visited at the party. And the President was already
2 upstairs--I had ascertained that from the usher--and I went
3 up, and I raised with him the whole question of Monica
4 Lewinsky and asked him directly if he had had sexual
5 relations with Monica Lewinsky, and the President said, "No,
6 never."
7 Q All right. Now, during that conversation, did you
8 tell the President again that Monica Lewinsky had been
9 subpoenaed?
10 A Well, we had established that.
11 Q All right. And did you tell him that you were
12 concerned about her fascination?
13 A I did.
14 Q And did you describe her as being emotional in
15 your meeting that day?
16 A I did.
17 Q And did you relate to the President that Ms.
18 Lewinsky asked about whether he was going to leave the First
19 Lady at the end of the term?
20 A I did.
21 Q And as--and then, you concluded that with the
22 question as to whether he had had sexual relations with Ms.
23 Lewinsky?
24 A And he said he had not, and I was satisfied--end
25 of conversation.

1 Q Now, once again, just as I asked the question in
2 reference to Ms. Lewinsky, it appears to me that this is an
3 extraordinary question to ask the President of the United
4 States. What led you to ask this question to the President?
5 A Well, first of all, I'm asking the question of my
6 friend who happens to be the President of the United States.
7 Q And did you expect your friend, the President of
8 the United States, to give you a truthful answer?
9 A I did.
10 Q Did you rely upon the President's answer in your
11 decision to continue your efforts to seek Ms. Lewinsky a
12 job?
13 A I believed him, and I continued to do what I had
14 been asked to do.
15 Q Well, my question was more did you rely upon the
16 President's answer in your decision to continue your efforts
17 to seek Ms. Lewinsky a job.
18 A I did not rely on his answer. I was going to
19 pursue the job in any event. But I got the answer to the
20 question that I had asked Ms. Lewinsky earlier from her, and
21 I got the answer from him that night as to the sexual
22 relationships, and he said no.
23 Q It would appear to me that there's two options.
24 One, you asked the question in terms of idle conversation,
25 and that does not seem logical in view of the fact that you

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1 made a point to go and visit the President about this alone.
2 A Yes. I never said that--I never talked about
3 options. I told you I went to ask him that question.
4 Q Well, was it idle conversation, or was there a
5 purpose in you asking him that question?
6 A It obviously, Congressman, was not idle
7 conversation.
8 Q All right.
9 A For him nor for me.
10 Q There was a purpose in it--and would you describe
11 it as being important, the question that you asked to him?
12 A I wanted to satisfy myself, based on my visit with
13 her, that there had been no sexual relationships, and he
14 said no, as she had said no.
15 Q And why was it important to you to satisfy
16 yourself on that particular point?
17 A I had seen this young lady, and I had seen her
18 reaction, uh, and it raised a presumption, uh, and I wanted
19 to satisfy myself, as I had done with her, that there had
20 been no sexual relationship between them.
21 Q If you had--
22 A And I did satisfy myself.
23 Q And if you had--well, let me rephrase it. If you
24 believed the presumption, or if you had evidence that Ms.
25 Lewinsky did have sexual relations with the President, would

1 this have affected your decision to act in the President's
2 interest in locating her a job when she had been subpoenaed
3 in a case adverse to the President?
4 A I do not think it would have affected my decision.
5 Q Now, you mentioned that you set up an appointment
6 for Ms. Lewinsky at the office of Frank Carter for December
7 22nd.
8 A Right.
9 Q Prior to that appointment with Mr. Carter, did Ms.
10 Lewinsky come to see you in your office?
11 A I took Ms. Lewinsky from my office, in my Akin
12 Gump, chauffeur-driven car, to Frank Carter's office.
13 Q And when she arrived at your office, did you have
14 a discussion with her?
15 A I think I got my coat, she got her--she had on her
16 coat--and we left.
17 Q While in your office before going to see Mr.
18 Carter, did Ms. Lewinsky ask about her job?
19 A Every conversation that I had with Ms. Lewinsky
20 had at some point to do with pending employment.
21 Q And I take that as a "yes" answer, but I would
22 also refer you to page 184 of your previous testimony in
23 which that answer was "yes."
24 A Yes.
25 Q And so prior to going to see Mr. Carter, you met

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1 with Ms. Lewinsky and--where she asked about her job?

2 A Well, as I'm putting on my coat, I mean, we did

3 not sit down and have a conference. We had an appointment.

4 Q Now, you last testified before the grand jury in

5 June of 1998, and you have not had the opportunity to

6 address some issues that Ms. Lewinsky raised when she

7 testified before the grand jury in August of 1998, and I

8 would like to--there will be a number of questions as we go

9 through this today relating to some things that she

10 testified to, because it's important that we hear your

11 responses to it, and so I'd like to ask you about a couple

12 of these particular areas.

13 During this meeting--and you say it was a short

14 meeting, that you really didn't sit down--but during this

15 time, did Ms. Lewinsky ask if you had told the President

16 that she had been subpoenaed in the Jones case?

17 A She may have, and--and if she did, I answered yes.

18 Q Even though you did not tell her about the

19 conversation on December 19th that you had with the

20 President in which you told the President she had been

21 subpoenaed?

22 A If she had asked, I would have told her. If she

23 asked me on the 22nd, I answered yes.

24 Q And did Ms. Lewinsky show you any gifts that she

25 was bringing to Mr. Frank Carter?

1 A Yeah--I'm not aware that Ms. Lewinsky showed me
2 any gifts. I have no--I have no recollection of her having
3 shown me gifts given her by the President. And my best
4 recollection is that she came to my office, I got myself
5 together, and that we left. I have no recollection of her
6 showing me gifts given her by the President.
7 Q Would you dispute if she in fact had gifts with
8 her on that occasion?
9 A I don't know whether she had gifts with her or
10 not. I do have--I have no recollection of her showing me,
11 saying, "This is a gift given me by the President of the
12 United States."
13 Q And if she testifies that she showed you the gifts
14 she was bringing Mr. Carter, you would dispute that
15 testimony?
16 A I have no~~t~~ ~~any~~ recollection of her showing me any
17 gifts.
18 Q And I take that as not denying it--
19 MR. KENDALL: Objection to form.
20 BY MR. HUTCHINSON:
21 Q --but that you have no recollection.
22 A Uh, I don't know how else to say it to you, Mr.
23 Congressman.
24 Q Well--
25 A I have no recollection of Ms. Lewinsky coming to

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1 my office and showing me gifts given her by the President of
2 the United States.
3 Q Let me go on. Did Ms. Lewinsky tell you that she
4 and the President had had phone sex?
5 A I think Ms.--I know Ms. Lewinsky told me about,
6 uh, telephone conversations with the President. If Ms.
7 Lewinsky had told me something about phone sex, I think I
8 would have remembered that.
9 Q And therefore, if she testifies that she told you
10 that Ms. Lewinsky and the President had phone sex, then
11 you'd simply deny her testimony in that regard?
12 A I--
13 MR. KENDALL: Object to the form.
14 THE WITNESS: I have no recollection, Congressman,
15 of Ms. Lewinsky telling me about phone sex--but given my
16 age, I would probably have been interested in what that was
17 all about.
18 SENATOR THOMPSON: We'll overrule the objection.
19 It's a leading question, but I think that it will be
20 permissible for these purposes.
21 MR. HUTCHINSON: It's my understanding, Senator,
22 that under the Senate rule, that the witness would be
23 considered an adverse witness.
24 SENATOR THOMPSON: That's correct.
25 BY MR. HUTCHINSON:

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1 Q Well, I don't mean to engage in disputes over fine
2 points, but I guess--
3 A Well, you obviously, Congressman, have Ms.
4 Lewinsky saying one thing and me saying another. I stand by
5 what I said.
6 Q Which is that you have no recollection of that
7 discussion taking place.
8 A But I do think that I would have remembered it had
9 it happened.
10 Q All right. Now, after your brief encounter or
11 meeting with Ms. Lewinsky in your office, did you take Ms.
12 Lewinsky in your vehicle to Mr. Carter's office?
13 A Yes.
14 Q And when you arrived at Mr. Carter's office, did
15 you meet with Mr. Carter in advance, while Ms. Lewinsky
16 waited outside?
17 A I said a brief hello to him. We talked about
18 lunch. I never took off my coat. I did take off my hat,
19 because it was inside. And I left them, and I got a piece
20 of his candy.
21 Q Now, I was looking at the testimony of Mr. Carter.
22 Now, do you recall a meeting with Mr. Carter in his office
23 while Ms. Lewinsky waited outside, even if it might have
24 been a brief meeting?
25 A Yes, I think maybe I went in. I just don't know--

1 I was there for a very short time.

2 Q Did you explain to Mr. Carter that you were

3 seeking Ms. Lewinsky a job at the request of the President?

4 A No, I did not, but I think he knew that.

5 Q And why do you think he knew that?

6 A I must have told him.

7 Q alright. So at some point, you believe that you told Mr.

8 Carter that you were seeking Ms. Lewinsky a job at the

9 request of the President?

10 A I think I may have done that.

11 Q Now, you have referred other clients to Mr. Carter

12 during your course of practice here in Washington, D.C.?

13 A Yes, I have.

14 Q About how many have you referred to him?

15 A Oh, I don't know. Maggie Williams is one client

16 that I--I remember very definitely.

17 I like Frank Carter a lot. He's a very able young

18 lawyer. He's a first-class person, a first-class lawyer,

19 and he's one of my new acquaintances amongst lawyers in

20 town, and I like being around him. We have lunch, and he's

21 a friend.

22 Q And is it true, though, that when you've referred

23 other clients to Mr. Carter that you never personally

24 delivered and presented that client to him in his office?

25 A But I delivered Maggie Williams to him in my

1 office. I had Maggie Williams to come to my office, and it
2 was in my office that I introduced, uh, Maggie Williams to
3 Mr. Carter, and she chose other counsel. I would have
4 happily taken Maggie Williams to his office.
5 Q But this is the only occasion that you took your
6 Akin, Gump-chauffeured vehicle and delivered the client to
7 Mr. Carter in his office?
8 A It was.
9 Q Now, we're not going to go through, probably to
10 your relief, each day's phone calls, but is it safe to say
11 that Ms. Lewinsky called you regularly, both keeping you
12 posted on her interviews and contacts, but also asking you
13 what you knew about her job desires?
14 A That is correct.
15 Q And it is also true that during this process, you
16 kept the President informed?
17 A That, too, is correct.
18 Q And did the President ever give you any other
19 instruction other than to find Ms. Lewinsky a job in New
20 York?
21 A I do not view the President as giving me
22 instructions. The President is a friend of mine, and I
23 don't believe friends instruct friends. Our friendship is
24 one of parity and equality.
25 Q Let me rephrase it, and that's--

1 A Thank you.
2 Q That's a fair comment that you certainly made.
3 Did you ever receive any other request from the
4 President in reference to your dealing with Monica Lewinsky
5 other than the request to find her a job in New York?
6 A That is correct.
7 MR. HUTCHINSON: I've been informed that there's a
8 few minutes left on the tape. Do you want to break?
9 THE VIDEOGRAPHER: Yes.
10 SENATOR THOMPSON: All right. Let's take a
11 5-minute break at this point.
12 Also, if it's not objectionable to anyone, let's
13 move a little closer to 1 o'clock, after all, for lunch, if
14 that's okay. We have a conference that that will coincide
15 with a little better, but for right now, let's take a
16 5-minute break.
17 SENATOR DODD: Just before we do, just to make
18 it--and the admonition about these--these--this matter being
19 in--confidential.
20 SENATOR THOMPSON: Right.
21 SENATOR DODD: And I'm going to restate that over
22 and over again today, so that people understand the rules
23 under which we're operating here, and this is confidential
24 and no one is to reveal anything they hear, except to the
25 people that was listed in Senator Thompson's opening

1 remarks.

2 SENATOR THOMPSON: Absolutely.

3 We'll be in recess.

4 THE VIDEOGRAPHER: This marks the end of Videotape
5 Number 1 in the deposition of Vernon E. Jordan, Jr. We are
6 going off the record at 11:35 a.m.

7 [Recess.]

8 THE VIDEOGRAPHER: This marks the beginning of
9 Videotape Number 2 in the deposition of Vernon E. Jordan,
10 Jr. We are going back on the record at 11:49 a.m.

11 SENATOR THOMPSON: All right, Mr. Hutchinson, and
12 you have consumed an hour and 40 minutes.

13 MR. HUTCHINSON: Thank you, Senator Thompson.

14 BY MR. HUTCHINSON:

15 Q Mr. Jordan, I was reminded that the last question
16 I asked you received an answer that I didn't, at least,
17 understand, so I'm going to reask that question, and the
18 question that I had asked, I believe, was: Did you ever
19 receive any other request from the President in reference to
20 your dealings with Ms. Lewinsky other than the request to
21 find her a job in New York? And I think your answer was:
22 That's correct. And that confuses me a little bit, so let
23 me rephrase the question.

24 Did you ever receive--not rephrase it, but restate
25 the question. Did you ever receive any other request from

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1 the President in reference to your dealings with Monica
2 Lewinsky other than the request to find her a job in New
3 York?
4 A I did not.
5 Q Now, let me go to December 31, 1997, in reference
6 to another issue that Ms. Lewinsky has testified about in
7 her August grand jury appearance and in which you have not
8 had the opportunity to discuss in detail.
9 Ms. Lewinsky has testified that she met you for
10 breakfast at the Park Hyatt--
11 MR. HUNDLEY: Excuse me. I think you misspoke
12 yourself. You said '97.
13 MR. HUTCHINSON: This is '97, right?
14 MR. HUNDLEY: It is? I apologize.
15 MR. HUTCHINSON: Okay. Thank you, Mr. Hundley.
16 The years are confusing, but I believe this is December 31,
17 1997.
18 BY MR. HUTCHINSON:
19 Q And Ms. Lewinsky has testified that she met you
20 for breakfast at the Park Hyatt, and even specifically as to
21 what she had for breakfast on that particular occasion when
22 she met with you and as to the conversation that she had.
23 And I want to show you, in order to hopefully
24 refresh your recollection, an exhibit which I'm going to
25 mark as the next exhibit number, which will be 6, I believe?

1 SENATOR THOMPSON: Yes. What--

2 MR. HUTCHINSON: And it's in the binder as Exhibit
3 42. It is not there, but it is in the binder as Exhibit 42.

4 SENATOR THOMPSON: Let's take a moment so everyone
5 can refer to that.

6 BY MR. HUTCHINSON:

7 Q Have you located that, Mr. Jordan?

8 A [Nodding head up and down.]

9 Q And this receipt, is this a receipt for a charge
10 that you had at the Park Hyatt on December 31st?

11 A That's an American Express receipt for breakfast.

12 Q And is the date December 31st?

13 A That is correct.

14 Q And does it reflect the items that were consumed
15 at that breakfast?

16 A It reflects the items that were paid for at that
17 breakfast.

18 [Laughter.]

19 BY MR. HUTCHINSON:

20 Q Does it appear to you that this is a breakfast for
21 two people?

22 A The price suggests that it was a breakfast for two
23 people.

24 Q All right. And the fact that there's two coffees,
25 there is one omelet, one English muffin, one hot cereal, and

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1 can you identify from that what you ordinarily eat at
2 breakfast?
3 A What I ordinarily eat at breakfast varies. This
4 morning, it was fish and grits.
5 Q All right. Now, Ms. Lewinsky in her testimony, I
6 think, referenced as to what she ate, which I believe would
7 be confirmed in this record.
8 Do you recall a meeting with Ms. Lewinsky at the
9 Park Hyatt on December 31st of--
10 A If you--
11 Q --1997?
12 A If you would refer to my testimony before the
13 grand jury when asked about a breakfast with Ms. Lewinsky on
14 December 31st, I testified that I did not have breakfast
15 with Ms. Lewinsky on December 31st because I did not
16 remember having had breakfast with Ms. Lewinsky on December
17 31st. It was not on my calendar. It was New Year's Eve. I
18 have breakfast at the Park Hyatt Hotel three or four times a
19 week if I am in town, and so I really did not remember
20 having breakfast with Ms. Lewinsky. And that's an honest
21 statement, I did not remember, and I told that to the grand
22 jury.
23 It is clear, based on the evidence here, that I
24 was at the Park Hyatt on December 31st. So I do not deny,
25 despite my testimony before the grand jury, that on December

1 31st that I was there with Ms. Lewinsky, but I did testify
2 before the grand jury that I did not remember having a
3 breakfast with her on that date, and that was the truth.
4 My recollection has subsequently been refreshed,
5 and--and so it is--it is undeniable that there was a
6 breakfast in my usual breakfast place, in the corner at the
7 Park Hyatt. I'm there all the time.
8 Q All right. And so--and that would be with Ms.
9 Lewinsky?
10 A Yes.
11 Q And so the--so your memory has been refreshed, and
12 I appreciate the statement that you just made.
13 Let me go to that meeting with her and ask whether
14 during this occasion that you met her for breakfast that
15 there was a discussion about Ms. Linda Tripp and Ms.
16 Lewinsky's relationship with her and conversations with her.
17 A I also testified in my grand jury testimony that I
18 never heard the name "Linda Tripp" until such time that I
19 saw the Drudge Report. I did not have a conversation with
20 Ms. Lewinsky at the breakfast at the Park Hyatt Hotel on
21 December 31st about Linda Tripp. I never heard the name
22 "Linda Tripp," knew nothing about Linda Tripp until I read
23 the Drudge Report.
24 Q ~~All right~~. And do you recall a discussion with
25 Ms. Lewinsky at the Park Hyatt on this occasion in which

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1 there were notes discussed that she had written to the
2 President?
3 A I am certain that Ms. Lewinsky talked to me about
4 notes.
5 Q On this occasion?
6 A Yes.
7 Q And would these have been notes that she would
8 have sent to the President?
9 A I think that there was--these notes had to do with
10 correspondence between Ms. Lewinsky and the President.
11 Q And would have she mentioned the retention or
12 copies of some of that correspondence on her computer in her
13 apartment?
14 A She may have done that.
15 Q And did you ask her a question, were these notes
16 from the President do you?
17 A I understood from our conversation that she and
18 the President had correspondence that went back and forth.
19 Q And did you make a statement to her, "Go home and
20 make sure they're not there"?
21 A Mr. Hutchinson, I'm a lawyer and I'm a loyal
22 friend, but I'm not a fool, and the notion that I would
23 suggest to anybody that they destroy anything just defies
24 anything that I know about myself. So the notion that I
25 said to her go home and destroy notes is ridiculous.

1 Q Well, I appreciate that reminder of ethical
2 responsibilities. It was--
3 A No, it had nothing to do with ethics, as much as
4 it's just good common sense, mother wit. You remember that
5 in the South.
6 Q And so--and let me read a statement that she made
7 to the grand jury on August 6th, 1998. This is the
8 testimony of Ms. Lewinsky, referring to a conversation with
9 you at the Park Hyatt that, "She," referring to Linda Tripp,
10 "was my friend. I didn't really trust her. I used to trust
11 her, but I didn't trust her anymore, and I was a little bit
12 concerned because she had spent the night at my home a few
13 times, and I thought--I told Mr. Jordan. I said, 'Well,
14 maybe she's heard some'--you know, I mean, maybe she saw
15 some notes lying around, and Mr. Jordan said, 'Notes from
16 the President to you?,' and I said, 'No. Notes from me to
17 the President,' and he said, 'Go home and make sure they're
18 not there.'"
19 A And, Mr. Hutchinson, I'm saying to you that I
20 never heard the name "Linda Tripp" until I read the
21 Judge--Drudge Report.
22 Secondly, let me say to you that I, too, have read
23 Ms. Lewinsky's testimony about that breakfast, and I can say
24 to you, without fear of contradiction on my part, maybe on
25 her part, that the notion that I told her to go home and

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1 destroy notes is just out of the question.

2 Q And so this is not a matter of you not recalling

3 whether that occurred or not--

4 A I am telling you--

5 Q Well, let me--

6 A --emphatically--

7 Q Mr. Jordan, let me finish the question.

8 A Okay, all right.

9 Q Please, sir.

10 A Okay.

11 Q It's sort of important for the record.

12 This is a statement by Ms. Lewinsky that you

13 flatly and categorically deny?

14 A Absolutely.

15 Q Now, you talked about "mother wit," I think it

16 was; that you knew at the time that you had this discussion

17 with Ms. Lewinsky that these notes would have been covered

18 by the subpoena based upon your discussion of that on

19 December 19th?

20 A Ask that question again.

21 Q ~~All right~~. This is a meeting on December 31st at

22 the Park Hyatt.

23 A Right.

24 Q A discussion about the notes, correspondence

25 between Ms. Lewinsky and the President.

1 A Right.

2 Q You are aware, based upon your discussion of the

3 subpoena on December 19th, that these were covered under the

4 subpoena?

5 A Yes.

6 Q And did you tell Ms. Lewinsky that you need to

7 make sure you tell your attorney, Mr. Carter, and that these

8 are turned over under the subpoena?

9 A What I did not tell her was to destroy the notes.

10 Whether I told her to give them to Mr. Carter or not, I have

11 no recollection of that.

12 Q But you knew at the time that these notes were a

13 matter of evidence?

14 A I think that's a valid assumption.

15 Q ~~But~~ That you knew that?

16 A It's a valid assumption.

17 Q Now, during this meeting at the Park Hyatt, did

18 Ms. Lewinsky also make it clear to you that she was in love

19 with the President?

20 A That, I had already concluded.

21 Q And if Ms.--now, was there anything else at the

22 Park Hyatt at this meeting on December 31st that you recall

23 discussing with Ms. Lewinsky?

24 A Job, work, in New York, in the private sector.

25 Q And that was the--was this a meeting that was set

1 up at her request or your request?

2 A I'm certain it was at her request. I am fairly

3 certain that I did not call Ms. Lewinsky and say will you

4 join me at the Park Hyatt for breakfast on December 31st, on

5 New Year's Eve.

6 Q All right. And did you also talk about her

7 situation under the subpoena and the fact that she was going

8 to have to give testimony, it looked like?

9 A I am not Ms. Lewinsky's lawyer, and I did not view

10 it as my responsibility to give Ms. Lewinsky advice and

11 counsel.

12 I had found her very able, competent counsel.

13 Q Respectfully, I am simply asking whether that was

14 discussed.

15 A And I am simply saying to you, I did not provide

16 her legal counsel.

17 Q Okay. Was it discussed in--not in terms of legal

18 representation, but in terms of Mr. Jordan to Monica

19 Lewinsky about any emotional concerns she might have about

20 pending testimony?

21 A I have no recollection of talking to her about

22 pending testimony.

23 Q Fair enough. Now, let's go back to Mr. Carter's

24 representation of Ms. Lewinsky that you referred to. Were

25 you aware that Mr. Carter was preparing an affidavit for Ms.

1 Lewinsky to sign in the Jones case?
2 A Yes.
3 Q And on or about the 6th or 7th of January, did you
4 become aware that she in fact had signed the affidavit and
5 that Mr. Carter had filed a motion to quash her subpoena in
6 the case?
7 A She told me that she had signed the affidavit.
8 Q And did in fact Mr. Carter also relate to you that
9 that had occurred?
10 A Yes.
11 Q And I think you made a statement in your March
12 grand jury testimony that there was no reason for
13 accountability, that he reassured me that he had things
14 under control?
15 A That is correct. I stand by that testimony.
16 Q And now, if you would, look at the next exhibit,
17 which is in that stapled bunch of exhibits that have been
18 provided to you.
19 MR. HUTCHINSON: This will be Exhibit No. 7, we'll
20 mark for your deposition.
21 And, Senator, did we put Exhibit No. 6 in?
22 SENATOR THOMPSON: No, we didn't.
23 MR. HUTCHINSON: I would like to offer that as an
24 exhibit to this deposition.
25 SENATOR THOMPSON: It will be made a part of the

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1 record.

2 [Jordan Deposition Exhibit

3 Nos. 6 and 7 marked for

4 identification.]

5 [Witness perusing document.]

6 SENATOR DODD: That is Number 6?

7 MR. HUTCHINSON: Six. That's the Park Hyatt.

8 SENATOR DODD: Oh, that is going to be Number 6,

9 the Park Hyatt, not the--

10 MR. HUTCHINSON: Yes.

11 SENATOR THOMPSON: Now, what is 7?

12 MR. HUTCHINSON: Now, 7 is the affidavit of Jane

13 Doe Number 6, which in the--I think everybody has found that

14 in the book.

15 SENATOR THOMPSON: What is the grand jury number?

16 MR. HUTCHINSON: It's 85, the grand jury number.

17 This will be Deposition Exhibit Number 7.

18 BY MR. HUTCHINSON:

19 Q Now, Mr. Jordan, I think you're reviewing that.

20 This affidavit bears the signature on the last

21 page of Monica S. Lewinsky, is that correct?

22 A Yes.

23 Q And have you ever seen this signed affidavit

24 before?

25 A I don't think so.

1 Q Do you not recall that Ms. Lewinsky brought this
2 in and showed it to you?
3 A She may have.
4 Q And I'd be glad to refresh you. I know that some
5 of this--
6 A Yeah, if it's in the testimony, Congressman.
7 Q Page 192 of your previous grand jury testimony.
8 Is it your recollection that she showed this to you in a
9 meeting in your office after she had signed it?
10 A I stand by that testimony.
11 Q And so the date of that signature of Ms. Lewinsky,
12 is that January 7?
13 A January 7th, 1998.
14 Q All right. Now, whenever she presented this
15 signed affidavit to you, did you read it sufficiently to
16 know that it stated that Ms. Lewinsky did not have a sexual
17 relationship with the President?
18 A I was aware that that was in the affidavit.
19 Q And I believe you previously testified that you're
20 a quick reader and you skimmed it and familiarized yourself
21 with it?
22 A Skimmed it.
23 Q And prior to seeing the signed affidavit that she
24 brought to you, the day after it was signed, was there a
25 time that Ms. Lewinsky called you concerning the affidavit

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1 and said that she had some questions about the draft of the
2 affidavit?
3 A Yes. I do recollect her calling me and asking me
4 about the affidavit, and I said to her that she should talk
5 to the--talk to Frank Carter, her counsel, about the
6 affidavit and not to me.
7 Q And if I could go into, again, some areas that had
8 not been previously asked to you, and since Ms. Lewinsky
9 testified to the grand jury on August 6th.
10 Ms. Lewinsky has testified that she dropped a copy
11 of the affidavit to you, and that you--and that you and she
12 had a telephone conversation in which you discussed changes
13 to the affidavit. Does this refresh your recollection, and
14 do you agree with Ms. Lewinsky's recollection of a
15 discussion on changes in the affidavit?
16 A I do agree with the assumption--I mean, I do agree
17 with the statement that Ms. Lewinsky dropped the affidavit
18 off and called me up about the affidavit and was quite
19 verbose about it, and I sort of listened and said to her,
20 "You need to talk to Frank Carter."
21 She was not satisfied with that, and so she kept
22 talking and I kept doodling and listening as she went on in
23 sort of a, for lack of a better word, babble about
24 this--about this thing, but it was not my job to advise her
25 about an affidavit. I don't do affidavits.

1 Q Now, if I may show you, which would be Exhibit--
2 MR. HUTCHINSON: First, let me go ahead and offer
3 7.
4 SENATOR THOMPSON: It's made a part of the record.
5 [Jordan Deposition Exhibit No.
6 7 received in evidence.]
7 MR. HUTCHINSON: It's part of the record.
8 And then go to Exhibit 8, which was marked as
9 Exhibit 39 as your previous grand jury testimony.
10 [Jordan Deposition Exhibit No.
11 8 marked for identification.]
12 [Witness perusing document.]
13 BY MR. HUTCHINSON:
14 Q Now, Exhibit 8 is a summary of telephone calls on
15 January 6th, which would be the day before the affidavit was
16 signed by Ms. Lewinsky on the 7th.
17 Now, you can reflect on that for a moment, but in
18 reviewing these calls, it appears that Mr. Carter was paging
19 Ms. Lewinsky early on in the day, 11:32 a.m., and then at
20 3:26, you had a telephone call with Mr. Carter for 6 minutes
21 and 42 seconds.
22 And then there was--call number 6 was to Ms.
23 Lewinsky, which was obviously a 24-second short call, and
24 then a subsequent call for almost 6 minutes at 3:49 p.m. to
25 Ms. Lewinsky.

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1 Was this last call for 5 minutes to Ms. Lewinsky
2 the call that you just referenced in which the draft
3 affidavit was discussed?
4 A I think that is correct. The 24-second call, I
5 think, was voice mail.
6 Q Was--was--pardon?
7 A Voice mail.
8 Q Certainly.
9 And subsequent to your conversation with Ms.
10 Lewinsky for 5 minutes and 54 seconds, did you have two
11 calls to Mr. Carter, which would be No. 9 and 10?
12 [Witness perusing document.]
13 THE WITNESS: Yes.
14 BY MR. HUTCHINSON:
15 Q Do you know why you would have been calling Mr.
16 Carter on three occasions, the day before the affidavit was
17 signed?
18 A Yeah. I--my recollection is--is that I was
19 exchanging or sharing with Mr. Carter what had gone on, what
20 she had asked me to do, what I refused to do, reaffirming to
21 him that he was the lawyer and I was not the lawyer. I
22 mean, it would be so presumptuous of me to try to advise
23 Frank Carter as to how to practice law.
24 Q Would you have been relating to Mr. Carter your
25 conversations with Ms. Lewinsky?

1 A I may have.
2 Q And if Ms. Lewinsky expressed to you any concerns
3 about the affidavit, would you have relayed those to Mr.
4 Carter?
5 A Yes.
6 Q And if Mr. Carter was a good attorney that was
7 concerned about the economics of law practice, he would have
8 likely billed Ms. Lewinsky for some of those telephone
9 calls?
10 A You have to talk to Mr. Carter about his billing.
11 Q It wouldn't surprise you if his billing did
12 reflect a--a charge for a telephone conversation with Mr.
13 Jordan?
14 A Keep in mind that Mr. Carter spent most of his
15 time in being a legal services lawyer. I think his
16 concentration is primarily on service, rather than billing.
17 Q But, again, based upon the conversations you had
18 with him, which sounds like conversations of substance in
19 reference to the affidavit, that it would be consistent with
20 the practice of law if he charged for those conversations?
21 A That's a question you'd have to ask Mr. Carter.
22 Q They were conversations of substance with Mr.
23 Carter concerning the affidavit?
24 A And they were likely conversations about more than
25 Ms. Lewinsky.

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1 Q But the answer was yes, that they were
2 conversations of substance in reference to the affidavit?
3 A Or at least a portion of them.
4 Q In other words, other things might have been
5 discussed?
6 A Yes.
7 Q In your conversation with Ms. Lewinsky prior to
8 the affidavit being signed, did you in fact talk to her
9 about both the job and her concerns about parts of the
10 affidavit?
11 A I have never in any conversation with Ms. Lewinsky
12 talked to her about the job, on one hand, or job being
13 interrelated with the conversation about the affidavit. The
14 affidavit was over here. The job was over here.
15 Q But the--in the same conversations, both her
16 interest in a job and her discussions about the affidavit
17 were contained in the same conversation?
18 A As I said to you before, Counselor, she was always
19 interested in the job.
20 Q Okay. And she was always interested in the job,
21 and so, if she brought up the affidavit, very likely it was
22 in the same conversation?
23 A No doubt.
24 Q And that would be consistent with your previous
25 grand jury testimony when you expressed that you talked to

1 her both about the job and her concerns about parts of the
2 affidavit?
3 A That is correct.
4 Q Now, on January 7th, the affidavit was signed.
5 Subsequent to this, did you notify anyone in the White House
6 that the affidavit in the Jones case had been signed by Ms.
7 Lewinsky?
8 A Yeah. I'm certain I told Betty Currie, and I'm
9 fairly certain that I told the President.
10 Q And why did you tell Betty Currie?
11 A I'm--I kept them informed about everybody else
12 that was--everything else. There was no reason not to tell
13 them about that she had signed the affidavit.
14 Q And why did you tell the President?
15 A The President was obviously interested in her job
16 search. We had talked about the affidavit. He knew that
17 she had a lawyer. It was in the due course of a
18 conversation. I would say, "Mr. President, she signed the
19 affidavit. She signed the affidavit."
20 Q And what was his response when you informed him
21 that she had signed the affidavit?
22 A "Thank you very much."
23 Q All right. And would you also have been giving
24 him a report on the status of the job search at the same
25 time?

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1 A He may have asked about that, and--and part of her
2 problem was that, you know, she was--there was a great deal
3 of anxiety about the job. She wanted the job. She was
4 unemployed, and she wanted to work.
5 Q Now, I think you indicated that he was obviously
6 concerned about--was it her representation and the
7 affidavit?
8 A I told him that I had found counsel for her, and I
9 told him that she had signed the affidavit.
10 Q Okay. You indicated that he was concerned,
11 obviously, about something. What was he obviously concerned
12 about in your conversations with him?
13 A Throughout, he had been concerned about her
14 getting employment in New York, period.
15 Q And he was also concerned about the affidavit?
16 A I don't know that that was concern. I did tell
17 him that the affidavit was signed. He knew that she had
18 counsel, and he knew that I had arranged the counsel.
19 Q Do you know whether or not the President of the
20 United States ever talked to her counsel, Mr. Carter?
21 A I have--I have no knowledge of that.
22 Q Did you ever relate to Mr. Carter that you were
23 having discussions with the President concerning his
24 representation of Ms. Lewinsky and whether she had signed
25 the affidavit?

1 A I don't know whether I told him that she had--he
2 had--I don't know whether I told Mr. Carter that I told the
3 President he had signed the affidavit. It is--it is not
4 beyond reasonableness.
5 Q Now let's go on. After the affidavit was signed,
6 were you ultimately successful in obtaining Ms. Lewinsky a
7 job?
8 A Yes.
9 Q And in fact, the day after Ms. Lewinsky signed the
10 affidavit, you placed a personal call to Mr. Ron Perelman of
11 Revlon, encouraging him to take a second look at Ms.
12 Lewinsky?
13 A That is correct, based on the fact that Ms.
14 Lewinsky thought that her interview had not gone well, when
15 in fact it had gone well.
16 Q Okay. And in fact, Ms. Lewinsky had called you on
17 a couple of occasions after the interview and finally got a
18 hold of you and told you she thought the interview went
19 poorly?
20 A That's correct.
21 Q And as a response to that information, you did not
22 call Mr. Halperin back, who you had previously talked to
23 about the issue, but you called Mr. Perelman?
24 A That's right.
25 Q Was there a reason that you called Mr. Perelman in

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1 contrast to Mr. Halperin?

2 A Well, the same reason I would have called you

3 about a committee if you were chairman of it, as opposed to

4 calling to a member of the committee.

5 Q All right. You wanted to go to the top?

6 A When it's necessary.

7 Q And I remember a phrase you used. I might not

8 have it exactly right, but you don't get any richer or more

9 powerful than Mr. Perelman?

10 A Certainly not much richer.

11 Q Okay. And--and so you had a conversation with Mr.

12 Perelman, and did you tell him something like, make it

13 happen if it can happen?

14 A I said, "This young lady"--I mean, I think I said,

15 "This young lady has been interviewed. She thinks it did

16 not go well. Would you look into it?"

17 Q And what was his response?

18 A That he would look into it.

19 Q Now I'd like to show you the next exhibit, and

20 before I do that, I would go back and offer Number 7.

21 SENATOR THOMPSON: Seven is the last.

22 This would be Number 8 that you--that you have

23 been discussing. The compilation of the telephone call

24 record?

25 MR. HUTCHINSON: Yes.

1 MR. KENDALL: I object. Same ground as before.
2 It's not best evidence. We don't know who compiled these.
3 These are not primary records.
4 SENATOR THOMPSON: Mr. Jordan has verified several
5 of these items, but I do notice there are some items here
6 that do not have to do with Mr. Jordan, that we could not
7 expect him to be able to verify.
8 So I would ask counsel, if he needs to identify
9 any more of these conversations and use this to reflect Mr.
10 Jordan's memory, he's free to do so, but as an exhibit, I
11 think the objection is probably well taken.
12 MR. HUTCHINSON: Let me just state, Senator, that
13 this is a compilation of calls based upon the records that
14 have been in the Senate record, and this has been--this
15 compilation has been in there some time.
16 Now, I, quite frankly, understand the objection,
17 and it might have meritorious if this was being introduced
18 into evidence in the actual trial, and so I would suggest
19 perhaps, since he's identified most of the calls already,
20 that this could be referenced as a deposition exhibit
21 because he's referred to it and that's helpful,
22 without--obviously, there might in a more--it might not be
23 entered into evidence as such.
24 SENATOR THOMPSON: Could I ask you if it's been in
25 the record as a compilation?

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1 MR. HUTCHINSON: Yes, it has.

2 SENATOR THOMPSON: In this form? I notice that it

3 has a grand jury--

4 MR. HUTCHINSON: It's--Senator, it's Volume III of

5 the Senate record, page 161, and so it's all in there,

6 anyway.

7 SENATOR THOMPSON: I notice in the record here,

8 counsel is informing me that it is in the record, but there

9 are several redactions. Is that correct?

10 MR. HUTCHINSON: That is correct, and for that

11 reason--in fact, a number of these summaries are not

12 redacted in our form and they're redacted in the record, and

13 we'd like to have the opportunity to redact it in the form

14 of taking out the personal telephone numbers.

15 MR. KENDALL: Senator Thompson, if I may be heard,

16 my objection is--to this is a summary. We don't know who

17 did it. We don't know what it's based on.

18 The witness has testified, and his testimony is in

19 the record, so far as his recollection is refreshed.

20 I have no objection to original phone records, but

21 I do object to the summary.

22 SENATOR THOMPSON: Counsel, could I suggest that

23 maybe you just make a reference specifically to where it is

24 in the existing record? I think it would serve your same

25 purpose and to keep you from having--

1 MR. HUTCHINSON: Sure.

2 SENATOR THOMPSON: --to go through and redact

3 everything. Would that be satisfactory?

4 MR. HUTCHINSON: I think that would be

5 satisfactory, and what I can do is that I can withdraw this

6 exhibit and reference in the transcript of this deposition

7 that the exhibit is found in Table 35 of Senate record,

8 Volume III, at page 161.

9 SENATOR DODD: Let me just ask the House Manager,

10 if I can as well. Are these from the Senate record? I'm

11 told that some of these are not from the Senate record, and

12 we're kind of confined to the Senate record, as I understand

13 it.

14 MR. HUTCHINSON: Well, other than the redactions,

15 this summary itself is in the Senate record.

16 SENATOR THOMPSON: Yes.

17 Counsel informs me, it's already in. It refers to

18 evidentiary record Volume IV.

19 MS. BOGART: Is it IV or III?

20 SENATOR THOMPSON: It says IV here, Part 2

21 of--Part 2 of 3.

22 So, for the record, this would be pages 1884 and

23 1885 of the evidentiary record, Volume IV, Part 2 of 3, all

24 right?

25 MR. HUTCHINSON: Thank you.

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1 SENATOR THOMPSON: All right. So the record will
2 be--the objection will be sustained, and reference has been
3 made.
4 SENATOR DODD: And can we just--because I presume
5 you may have more of these coming along, and it seems to me
6 you might want to have staff or others begin to work so we
7 don't go through this every time, particularly with the
8 unredacted material that may be included in here, which is
9 not part of the Senate record.
10 The unredacted information comes out of the House
11 record, as I understand, and that is a distinction.
12 MR. HUNDLEY: I would just add that Mr.
13 Jordan--the last 3 days of his grand jury testimony, they
14 asked him about every phone call, and if you want to use
15 those, you know, go to his grand jury testimony, you know, I
16 think it would move things along.
17 There isn't a phone call. We produced like a
18 telephone book of phone calls that Mr. Jordan made, and they
19 called ~~called~~ them all out, after they got through asking about
20 who's that, who's that and who's the--you've got a pretty
21 good record of calls that might have some relevance in this.
22 SENATOR THOMPSON: All right, sir. All right.
23 SENATOR DODD: Let me also just suggest on the
24 earlier--Senator Thompson, in the earlier objection raised
25 by Counsel Kendall, sustained the objection, but had made

1 reference to the fact that since this material had been
2 brought into the record that those--if any documentation is
3 included there, that we--we do use the Senate documents with
4 the redacted information, rather than the House records for
5 the purposes of this deposition.
6 SENATOR THOMPSON: All right, sir.
7 MR. HUTCHINSON: Thank you.
8 SENATOR THOMPSON: Proceed.
9 BY MR. HUTCHINSON:
10 Q And I will handle it this way, Mr. Jordan, and let
11 me say that I was sort of constructing my questioning, so as
12 not to get bogged down in an extraordinary number of
13 telephone calls, but let me go to the chart in front of you
14 which is Grand Jury Exhibit 44, which is marked for our
15 purposes as Exhibit 9 for identification purposes.
16 [Jordan Deposition Exhibit No.
17 9 marked for identification.]
18 [Witness perusing document.]
19 BY MR. HUTCHINSON:
20 Q And I'm going to--I'd like for you to refer
21 that--refer you to that for purposes of putting this
22 particular day, January 8th, in context and asking you some
23 questions about some of those telephone calls.
24 SENATOR THOMPSON: I'm sorry. What was the
25 question? Are you making reference for identification

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1 purposes?

2 MR. HUTCHINSON: Yes. This is Exhibit 9, which is

3 Grand Jury Exhibit 44.

4 SENATOR THOMPSON: All right, for identification

5 purposes.

6 MR. HUTCHINSON: Yes.

7 SENATOR THOMPSON: All right.

8 BY MR. HUTCHINSON:

9 Q Now, this is the day, January 8th, which is the

10 day that Ms. Lewinsky felt like she had a poor job

11 interview. Does this reflect calls from the Peter Strauss

12 residence to your office?

13 A I see a call number 3, 11:50 a.m., Peter Strauss

14 residence. The number is here to my office.

15 Q All right.

16 A And it says length of call, one minute.

17 Q All right. And, in fact, calls 3, 4 and 5 and 9

18 are calls from the Peter Strauss residence to your office?

19 A That is correct.

20 Q And Peter Strauss is the residence in which Ms.

21 Lewinsky was staying while in New York?

22 A I just know that Peter Strauss, my old friend, is

23 Monica Lewinsky's stepfather.

24 MR. HUNDLEY: But he wasn't there.

25 THE WITNESS: You know, where she was and all of

1 that, I don't know. I'm just--
2 BY MR. HUTCHINSON:
3 Q You received calls from Ms. Lewinsky on this
4 particular day?
5 A From this number, according to this piece of
6 paper.
7 Q And does this time reference coincide with your
8 recollection as to when you received calls from Ms. Lewinsky
9 on this particular day?
10 A Yes.
11 Q And during these calls is when she related the
12 difficulty of the job interview; is that correct?
13 A I believe so--that it had not gone well.
14 Q All right. And then, subsequently, you put in a
15 call to Mr. Perelman at Revlon?
16 A Yes.
17 Q And that was to encourage him to take a second
18 look. Is that call number 6 on this summary?
19 A Call number 6; it lasted one minute and 42
20 seconds.
21 Q And is that the call that you placed to Mr.
22 Perelman?
23 A I believe that is correct.
24 Q And this was subsequent to the calls that you
25 received from Ms. Lewinsky?

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1 A That is correct.

2 Q And then you let Ms. Lewinsky know that you had

3 called Mr. Perelman; and do you recall what you would have

4 told her at that time?

5 A I think I told her that I had spoken with, uh--

6 with, uh, Mr. Perelman, the chairman, and that I was hopeful

7 that things would work out.

8 Q ~~All right,~~ And, in fact, they did work out

9 because the next day you were informed that a temporary job-

10 -or a preliminary job offer had been made to Ms. Lewinsky?

11 A That's right.

12 Q So she was able to secure the job based upon your

13 call to Mr. Perelman?

14 A Based upon my call, from the time that I called

15 Halperin through to Mr. Perelman.

16 Q All right.

17 A I take credit for that.

18 Q All right. Now, in fact, you've used terms like

19 "the Jordan magic worked"?

20 A It--it has from time to time.

21 Q And it did on this occasion?

22 A I believe so.

23 Q And then, you also informed Ms. Betty Currie that

24 the mission was accomplished?

25 A Yes.

Q And after securing the job for Ms. Lewinsky, you did inform Betty Currie of that fact?

A And the President.

Q All right. And was the purpose of letting Betty Currie know so that she could tell the President?

A She saw the President much more often that I did.

Q And--but you wanted to inform the President personally that you were successful in getting Ms. Lewinsky a job?

A Yes.

Q And you did that, uh--was it on the--what, the day after she secured the job or the day--the day that she secured the job?

A I don't know the answer to that.

Q Well, shortly thereafter is it fair to say that you informed the President personally?

A I certainly told him.

Q ~~All right?~~ Now, at this point, you had successfully obtained a job for Ms. Lewinsky at the request of the President, and you had been successful in obtaining an attorney for Ms. Lewinsky. Did you see your responsibilities in regard to Ms. Lewinsky as continuing or completed?

A I don't know, uh, that I saw them as, uh, necessarily completed. There is--as you know from your own

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1 experience in helping young people with work, there tends to
2 be some sense of responsibility to follow through, that they
3 get to work on time, that they work hard, and that they
4 succeed. So I don't think that I felt that my
5 responsibility had terminated. I felt like I had a
6 continuing responsibility to just make sure that it happened
7 and that she--that it worked out all right. But I don't
8 think I acted on that responsibility.
9 Q Well, this is--the job was completed--I believe it
10 was January 8th when she secured the job?
11 A That was the day that I called Ronald Perelman.
12 Q Okay, so it would have been the 9th that she would
13 have been informed that she had the job.
14 A That's right.
15 Q So this is the 9th of January, and that mission
16 had been accomplished. Now, I want you to recall your
17 testimony of May 28th before the grand jury in which the
18 question was asked to you--and this is at page 81; the
19 question begins at the bottom of page 80.
20 Question: "When you introduced Monica Lewinsky to
21 Frank Carter on December 22, 1997, what further involvement
22 did you expect to have with Monica Lewinsky and Frank
23 Carter?"
24 Answer: "Beyond getting her the job, I thought it
25 was finished, done"--and what's that last word you used?

A "Finis."

Q "Finis." And so that was the basis on the question, was your previous testimony that after you got Ms. Lewinsky a job and after you secured her attorney, there was really no other need for involvement or continued meetings with her?

A That is correct. That does not mean, on the other hand, that, uh, if you go to a meeting at the board, that you don't stop in and see how--how people are doing. In this circumstance, that process was short-circuited very quickly.

Q I'm sorry?

A She never ended up working there. You--you--you do remember that.

Q Now, but you had described your frequent telephone calls from Ms. Lewinsky as being bordering on annoyance, I think. Is that a fair characterization?

A That's a fair characterization.

Q And you're a busy man. You stopped billing at $450 an hour. You're having calls from Ms. Lewinsky. Were you glad at this point to have this "bordering on annoyance" situation completed?

A "Glad" is probably the wrong word. "Relieved" is maybe a better word.

Q ~~All right~~. Now, during the time that you were

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1 helping Ms. Lewinsky secure a job, this was widely know at
2 the White House, is that correct?
3 A I--I don't know the extent to which it was widely
4 known. I dealt with Ms. Currie and with the President.
5 Q In fact, Ms. Cheryl Mills, sitting here at counsel
6 table, knew that you were helping Ms. Lewinsky?
7 A I believe that's true.
8 Q And Betty Currie knew that you were helping Ms.
9 Lewinsky?
10 A Yes.
11 Q The President knew it?
12 A Yes.
13 Q And you presumed that Bruce Lindsey knew it?
14 A I presumed that. That's a very small number,
15 given the number of people who work at the White House.
16 Q Now, after that December 19 meeting--and I'm
17 backtracking a little bit--the meeting that you had with Ms.
18 Lewinsky in which she covered with you the fact that she had
19 been subpoenaed, after that, you had numerous conversations
20 with Ms. Betty Currie; is that correct?
21 A I'm not sure I had numerous conversations with Ms.
22 Betty Currie, but I have always during this administration
23 been in touch with Ms. Currie.
24 Q And during those conversations with Ms. Betty
25 Currie, did you let her know that Ms. Lewinsky had been

1 subpoenaed?

2 A I think I've testified to that.

3 Q All right, and so would that have been fairly

4 shortly after the meeting on December 19th with Ms. Lewinsky

5 that you notified Betty Currie that Ms. Lewinsky had in fact

6 been subpoenaed?

7 A I--I think that's safe to say, Counselor.

8 MR. HUTCHINSON: Senator, I--this would be a good

9 time for a break, if that would meet with your approval, for

10 lunch.

11 SENATOR THOMPSON: All right, sir.

12 MR. HUTCHINSON: And I'm--it's hard to estimate,

13 and you probably don't trust lawyers when they tell you how

14 long it's going to take after lunch, but--

15 SENATOR THOMPSON: Try your best. Do you want to

16 make an estimate, or you'd rather not?

17 MR. HUTCHINSON: Oh, I think it would be less than

18 an hour that I would have remaining, and most likely much

19 shorter than that.

20 SENATOR THOMPSON: All right, sir.

21 THE WITNESS: May I make a suggestion? It's 25

22 minutes to 1. Do you want to go to 1 o'clock?

23 MR. HUTCHINSON: I think a break would be helpful.

24 THE WITNESS: To you or to me?

25 [Laughter.]

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1 SENATOR THOMPSON: I think some of us have some
2 scheduling issues, and I do understand that, so I'm open to
3 any suggestions, Senator Dodd or anyone else, as to how long
4 we want to take. Yesterday, they took an hour. I'm not--we
5 have a conference and I could use a little extra time, I
6 suppose, in addition to the hour, but it's not of major
7 concern to me.
8 I assume you want to get back as soon as possible.
9 THE WITNESS: I'm prepared to forgo lunch and stay
10 here as long as need be so we can finish. And we don't have
11 to have lunch; we can just keep going, if it's all right
12 with counsel.
13 SENATOR THOMPSON: Well, we've got some scheduling
14 issues that we are going to have to take care of. So let's
15 just make it--let's just make it--
16 SENATOR DODD: That clock is a little fast, I
17 think.
18 SENATOR THOMPSON: Is it?
19 SENATOR DODD: Is that right? It's about 12:30?
20 THE VIDEOGRAPHER: It's 12:35.
21 SENATOR DODD: So an hour and 15 minutes. Is
22 that--
23 SENATOR THOMPSON: What about--what about--let's
24 come back at 1:45. That will be about, what--that's an hour
25 and 10 minutes, isn't it, or 8 minutes, something like that?

1 All right. Without objection, then--

2 SERGEANT-AT-ARMS: Senator, we have lunch outside

3 here. It's sandwiches--

4 SENATOR DODD: Can we go off the record?

5 SENATOR THOMPSON: Are we off the record? Let's

6 go off the record.

7 THE VIDEOGRAPHER: We're going off the record now

8 at 12:33 p.m.

9 [Whereupon, at 12:33 p.m., a luncheon recess was

10 taken.]

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1 A F T E R N O O N S E S S I O N

2 [1:49 p.m.]

3 THE VIDEOGRAPHER: We are going back on the record

4 at 1349 hours.

5 SENATOR THOMPSON: All right. Mr. Hutchinson?

6 MR. HUTCHINSON: Thank you, Senators.

7 DIRECT EXAMINATION BY HOUSE MANAGERS - Resumed

8 BY MR. HUTCHINSON:

9 Q Mr. Jordan, good afternoon.

10 A Good afternoon.

11 Q You testified very clearly earlier today that you

12 were a close friend of the President. Would you also

13 describe yourself as a friend of Mr. Kendall, sitting to my

14 left, one of the attorneys for the President?

15 A Not only is Mr. Kendall my friend, Mr. Kendall

16 has, unfortunately, the distinction of graduating from

17 Wabash College, a little, small town in Indiana, and I'm a

18 graduate of DePauw University, and we have a 100-year

19 rivalry. And Mr. Kendall and I bet.

20 Mr. Hutchinson, I am pleased to tell you that Mr.

21 Kendall is in debt to me for 2 years because DePauw--

22 MR. KENDALL: May I object?

23 [Laughter.]

24 THE WITNESS: --because DePauw University has

25 defeated Wabash College two times in succession. And so,

1 yes, we are very good friends. I have great respect for him
2 as a person, as a lawyer, and despite his undergraduate
3 degree from Wabash, I respect his intellect.
4 BY MR. HUTCHINSON:
5 Q May I assume from that answer that the answer to
6 my question is yes?
7 A The answer--the answer to your question is,
8 indubitably, yes.
9 Q Now I am going to ask another question in similar
10 vein. You can answer yes or no. Do you consider yourself a
11 friend of Cheryl Mills?
12 A That requires more than just a "yes" answer.
13 Q I do not want to shortchange her, but I know
14 that--in fact, I think you might have, to a certain extent,
15 mentored her. Is that a fair description?
16 A And vice versa.
17 Q All right. And Bruce Lindsey, is he also a friend
18 of yours?
19 A Yes.
20 Q Now--so when was the last time that you met with
21 any member of the President's defense team?
22 A I have not had a meeting with a member of the
23 President's defense team. They were right nextdoor to me
24 just a few minutes ago, and we said hello, but we have not
25 had a meeting. And maybe if you'd tell me about what, I can

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1 be more specific.

2 Q Well--and that's a good point. Certainly, we're

3 lawyers, and we have casual conversations, and we visit and

4 we exchange pleasantries, and that's the way life should be.

5 I guess I was more specifically going to the

6 question as to whether you have discussed with the

7 President's defense team any matter of substance relating to

8 the present proceedings in the United States Senate.

9 A Any matter of substance relating to these

10 proceedings here in the United States Senate have been

11 handled very ably by my lawyer, Mr. William Hundley.

12 Q And I understand that, but my question is--despite

13 your able representation by Mr. Hundley--my question is--is

14 whether you had any meetings or discussions with the

15 President's defense team in regard to these proceedings.

16 A The answer is no.

17 Q Thank you.

18 And has anyone briefed you other than your

19 attorney, Mr. Hundley, on yesterday's deposition of Ms.

20 Lewinsky?

21 A The answer is no.

22 Q Now, you know Greg Craig?

23 A I do know Greg Craig.

24 Q And he's a member of the President's defense team

25 as well?

1 A Yes.

2 Q And you have not had any meetings of substance

3 with him in regard to the present proceedings?

4 A I have not.

5 Q And have you had any meetings with any of the

6 President's defense team in regard to not just the present

7 proceedings, but prior proceedings related to your testimony

8 before the grand jury or the investigation by the OIC?

9 A I have had conversations with the President's

10 lawyer, Mr. Bennett, and a conversation or two with Mr.

11 Kendall on the issue of settlement of the Paula Jones case,

12 and I believe I testified to that before the grand jury.

13 Q All right. Thank you, Mr. Jordan, and now let me

14 move to another area.

15 Do you recall an occasion in which Ms. Betty

16 Currie came to see you in your office a few days before the

17 President's deposition in the Jones case on January 17th?

18 A Yes, I do.

19 Q And I believe you have previously indicated that

20 it was on a Thursday or Friday, which would have been around

21 the 15th or 16th?

22 A Yeah. I've testified to that specifically as to

23 the date in my grand jury testimony, and I stand on that

24 testimony.

25 Q Certainly. But in general fashion, it would have

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1 been a couple of days before the President's testimony on
2 January 17th?
3 A I believe that is correct, sir.
4 Q And did--was this meeting with Betty Currie
5 originated by a telephone call with Ms. Betty Currie?
6 A Ms. Currie called me.
7 Q And did she explain to you why she needed to see
8 you?
9 A Yes, she did.
10 Q And was that that she had a call from Michael
11 Isikoff of Newsweek magazine?
12 A That is correct.
13 Q And what did she say about that that caused her to
14 call you?
15 A She had said that Mr. Isikoff had called her and
16 wanted to interview her, having something to do with Monica
17 Lewinsky, and I said to her, why don't you come to see me.
18 Q And why did you ask her to come see you, rather
19 than just talking to her about it over the telephone?
20 A I felt more comfortable doing that, and I think
21 she felt comfortable or more comfortable doing that, rather
22 than doing it on the telephone. And so I asked her to come
23 to my office, and she did.
24 Q Did you consider--or did she seem upset at the
25 time that she called?

1 A I think she was concerned.

2 Q And as--you did in fact meet with her in your

3 office?

4 A I did.

5 Q And what did she relate to you in your office?

6 A That Michael Isikoff was a friend of hers, and

7 that Michael Isikoff had called to--pursuant to a story that

8 he was about to write having to do with Ms. Lewinsky, and

9 she--she was concerned about what to do. And I suggested to

10 her that she talk to Bruce Lindsey and to Mike McCurry as to

11 what she should do, Bruce Lindsey on the legal side and Mike

12 McCurry on the communications side.

13 Q Did she explain to you what it was specifically

14 that Mr. Isikoff was inquiring about in reference to Ms.

15 Lewinsky?

16 A No. I don't remember the exact nature of

17 Isikoff's inquiry. What I do remember is that Isikoff, a

18 Newsweek magazine reporter, had called and was making these

19 inquiries, and she was at a loss as to where to turn or to

20 what to do, and I think that stemmed from the fact of some

21 White House policy saying that before you talk to anybody in

22 the media, you check it out.

23 Q And did she explain to you that she had already

24 seen Bruce Lindsey about it before she came to see you?

25 A She did not.

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1 Q And so you were basically telling her to see Bruce
2 Lindsey, and if she had already seen that, then that might
3 have not been that helpful?
4 A I don't know whether I was being helpful or not.
5 I responded to her, and I gave her the advice to call Bruce
6 Lindsey and to call Mike McCurry.
7 Q Let me refer you to the testimony of Ms. Betty
8 Currie, and perhaps that will help refresh you, and if not,
9 perhaps you can respond to it.
10 A Sure.
11 Q And for reference purposes, I'm referring to the
12 grand jury testimony of Ms. Betty Currie on May 6th, 1998,
13 at page 122.
14 MR. HUTCHINSON: Is there a way I--
15 MR. HUNDLEY: We don't have that. If you want
16 to--if you want us to read along or just--
17 THE WITNESS: Wait a minute. I might have it
18 right here. What page?
19 MR. HUTCHINSON: What's the exhibit number?
20 MR. HUNDLEY: How long is it, Mr. Hutchinson?
21 MR. HUTCHINSON: This would just be some short
22 question-and-answers.
23 MR. HUNDLEY: Why don't you just read it? We
24 don't--go ahead.
25 THE WITNESS: Oh, fine.

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1 BY MR. HUTCHINSON:
2 Q I'm going to read it, and if there's--it's at page
3 122, but this just puts it in context.
4 The question: "Ms. Currie, if I'm not mistaken,
5 if I could ask you a couple of questions. When you found
6 out Mr. Isikoff was curious about the courier receipts, you
7 were concerned enough to go visit Vernon Jordan?"
8 The answer is: "Correct."
9 And I'm skipping on down. I'm trying to point to
10 a couple of things that are of interest.
11 And question: "And you went to Bruce Lindsey
12 because you said you knew that he was working on the
13 matter?"
14 And question: "What did Bruce tell you after you
15 told him this?"
16 And answer: "He told me not to call him back,
17 referring to Mr. Isikoff, make him work for the story. I
18 remember that."
19 And then she refers to going to see Mr. Jordan.
20 Why did you tell him, or, "Why did you call Mr.
21 Jordan?"
22 Answer: "Because I had a comfort level with
23 Vernon, and I wanted to see what he had to say about it."
24 MR. KENDALL: Counsel, excuse me. I object to
25 your reading of that, but my understanding that the

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1 conversation with Bruce Lindsey occurred later. Are you
2 representing that it occurred before the visit to Mr.
3 Jordan? I don't have the transcript in front of me.
4 MR. HUTCHINSON: Well, I'm--I'm not making a
5 representation one way or the other. I'm just representing
6 what Ms. Currie testified to, and that is the context of it,
7 that the visit to Mr. Lindsey was prior to going to see Mr.
8 Jordan. And that is at page 122 through 130 of Betty
9 Currie's transcript of May 6th, 1998.
10 BY MR. HUTCHINSON:
11 Q But the first question, Mr. Jordan, is that she
12 refers to courier receipts. I believe that was referring to
13 courier records of gifts from Ms. Lewinsky to the President.
14 Did Ms. Currie come to you and say specifically
15 that Mr. Isikoff was inquiring about courier records on
16 gifts from Ms. Lewinsky to the President?
17 A I have no recollection of her telling me about the
18 specific inquiry that Isikoff was making. The issue for her
19 was whether or not she should see him, and I said to her,
20 before she made any decision about that, that she should
21 talk to these two particular people on the White House
22 staff.
23 Q Well, again, if Ms. Currie refers to the courier
24 receipts on gifts, would that be in conflict in any way with
25 your recollection as to what Mr. Isikoff was inquiring

1 about, what Ms. Currie told you?
2 A I stand on what I've just said to you.
3 Q Now, you followed this case, and, of course--
4 SENATOR THOMPSON: While we're on that subject,
5 does counsel need any additional time to look over that? I
6 don't want to leave an objection on the record. If you feel
7 like you need to press it--
8 SENATOR DODD: Do you have a copy of the document?
9 MR. KENDALL: Senator Thompson, we don't have the
10 full copy of the Currie transcript. This was not--
11 SENATOR THOMPSON: Why don't we reserve this,
12 then, and you can be looking at it, and then we'll--we'll
13 take it up a little later.
14 MR. KENDALL: We're still actually missing some
15 pages of the transcript. I don't know if somebody has that.
16 SENATOR DODD: Why don't you see if you can't get
17 them for them?
18 SENATOR THOMPSON: Okay.
19 SENATOR DODD: All right?
20 SENATOR THOMPSON: We'll let them be doing that,
21 if that's okay with everyone and--
22 SENATOR DODD: And you'll withdraw your objection
23 as of right now, or--
24 MR. KENDALL: Yes. I'll withdraw it until I can
25 scrutinize the pages, but I may then renew it.

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1 SENATOR THOMPSON: All right, sir.

2 BY MR. HUTCHINSON:

3 Q On--there's been some testimony in this case by
4 Ms. Lewinsky that on December 28th, there was a gift
5 exchange with the President; that subsequent to that, Ms.
6 Currie went out and picked up gifts from Ms. Lewinsky, and
7 she put those gifts under Ms. Currie's bed. Are you
8 familiar with that basic scenario?

9 A I read about it and heard about it. I do not know
10 that because that was told to me by Ms. Lewinsky or by Ms.
11 Currie.

12 Q Certainly, and I'm just setting that forth as a
13 backdrop for my questioning.

14 Now, you know, I guess it's--it might be difficult
15 to understand a great deal of concern about a news media
16 call, but if that news media call was about gifts or
17 evidence that was in fact under Ms. Currie's bed or involved
18 in that exchange, then that would be a little heightened
19 concern.

20 A Yes.

21 Q Would that seem fair?

22 A I do not, as I've said to you, know specifically
23 the nature of Mr. Isikoff's inquiry to Ms. Currie, and I
24 know nothing at that particular time about Mr. Isikoff
25 making an inquiry about gifts under the bed.

1 Q All right. I refer you to your grand jury
2 testimony of March 5, 1998, at page 73, when the question
3 was asked of you about Ms. Currie's visit to you, "What
4 exactly did she tell you?" and your answer: "She told me
5 that she had a call from Isikoff from Newsweek magazine, who
6 was calling to make inquiries about Monica Lewinsky and some
7 taped conversations, and I said you have to talk to Mike
8 McCurry and you have to talk to Bruce Lindsey."
9 And so, despite your statement today that you have
10 no recollection as to what she told you, going back to your
11 March testimony, you referred to her relating Isikoff
12 inquiring about taped conversations.
13 A And that's what it says, "taped conversations,"
14 and I stand by that.
15 What was taped, I don't know.
16 Q Well, I don't think you previously today mentioned
17 taped conversations.
18 MR. HUNDLEY: Well, I don't really think your
19 question would have called for that response, but I'm not
20 going to object.
21 MR. HUTCHINSON: Thank you, Mr. Hundley.
22 BY MR. HUTCHINSON:
23 Q I'm trying to get to the heart of the matter. Ms.
24 Currie is concerned enough that she leaves the White House
25 and goes to see Mr. Vernon Jordan, and she raises an issue

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with you and, according to your testimony, you told her simply, you need to go see Mike McCurry or Bruce Lindsey.

A That is correct.

Q And it's your testimony that she never raised with you any issue concerning the--Mr. Isikoff inquiring about gifts and records of gifts by Ms. Lewinsky?

A I stand by what I--what you just read to me about--from my testimony about tape~~s~~ conversations. I have no recollection about gifts or gifts under the bed.

Q Okay. Are you saying it did not happen, or you have no recollection?

A I certainly have no recollection of it.

Q Well, do you have a specific recollection that it did not happen, that she never raised the issue of gifts with you?

A It is my judgment that it did not happen.

Q Did she seem satisfied with your advice to go see Mr. Bruce Lindsey, who she presumably had already seen?

A I assumed that she took my advice.

Q Did she discuss in any way with you the incident on December 28th when she retrieved the gifts--

A She did not.

Q --from Ms. Lewinsky?

A She did not.

Q Now, a few days later, the President of the United

1 States testified before the grand jury in the--excuse
2 me--testified in his deposition in the Jones case. After
3 the President's deposition, did he have a conversation with
4 you on that day?
5 A Yes. I'm sure we talked.
6 Q And then, on the next day, and without getting
7 into the entire record of telephone calls, there was, is it
8 fair to say, a flurry of telephone calls in which everyone
9 was trying to locate Ms. Monica Lewinsky?
10 A The next day being which day?
11 Q The next day would have been--well, January 18th.
12 A That's Sunday.
13 Q Correct.
14 MR. HUNDLEY: I think it's the 19th.
15 THE WITNESS: I think it's the 19th when there was
16 a flurry of calls.
17 MR. HUTCHINSON: I think you're absolutely
18 correct.
19 THE WITNESS: We'll be glad to be helpful to you
20 in any way we can.
21 MR. HUNDLEY: We're even now. I was wrong on one.
22 You were wrong.
23 MR. HUTCHINSON: That's fair enough, fair enough.
24 BY MR. HUTCHINSON:
25 Q And on the 19th--of course, the 18th is in the

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1 record where the President visited with Ms. Betty Currie at
2 the White House--on the 19th, which would have been Monday,
3 was there on that day a flurry of activity in which there
4 were numerous telephone calls, trying to locate Monica
5 Lewinsky?
6 A Yes. And you have a record of those telephone
7 calls, and those telephone calls, Congressman, were driven
8 by two events--first, the Drudge Report; and later in the
9 afternoon, driven by the fact that, uh, I had been informed
10 by Frank Carter, counsel to Ms. Lewinsky, that he had been
11 relieved of his responsibilities as her counsel. And that
12 is the basis for these numerous telephone calls.
13 Q And you yourself were engaged in some of those
14 telephone calls trying to locate Ms. Lewinsky?
15 A Oh, yes, to ask her--I mean, I had just found out
16 that she had been involved in these conversations with this
17 person called Linda Tripp, and that was of some curiosity
18 and concern to me.
19 Q And you had heard Ms. Tripp's name previously on
20 December 31st at the Park Hyatt?
21 A I've testified already that I never heard the name
22 "Linda Tripp" until I saw the Drudge Report. I did not
23 testify that I heard the name "Linda Tripp" on December
24 31st.
25 Q So the first time you heard Ms. Tripp's name was

on January 19th when the Drudge Report came out?

A That is correct.

Q And you had already secured a--

A The 18th, I believe it was.

MR. HUNDLEY: Eighteenth.

THE WITNESS: Not the 19th.

BY MR. HUTCHINSON:

Q Thank you.

You had already secured a job for Ms. Lewinsky?

A That is correct.

Q And you--

A ~~Found~~ And a lawyer.

Q And a lawyer. And, as you had said at one point, job finished--finished. Why is it that you felt like you needed to join in the search for Ms. Lewinsky?

A If you had been sitting where I was, and all of a sudden you found out, after getting her a job and after getting her a lawyer, that there's a report that says that she's been--she's been taped by some person named Linda Tripp, I think just, mother wit, common sense, judgment, would have suggested that you would be interested in what that was about.

Q And were you trying to provide assistance to the President of the United States in trying to locate Ms. Lewinsky?

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1 A I was not trying to help the President of the
2 United States. At that point, I was trying to satisfy
3 myself as to what had gone on with this person for whom I
4 had gotten both a job and a lawyer.
5 Q Now, subsequent to this, you felt it necessary to
6 make a public statement on January 22 in front of the Park
7 Hyatt Hotel?
8 A I did make a public statement on January 22nd at
9 the Park Hyatt Hotel.
10 Q And what was the reason that you gave this public
11 statement?
12 A I gave the public statement because I was being
13 rebuked and scorned and talked about, sure as you're born,
14 and I felt some need to explain to the public what had
15 happened.
16 MR. HUTCHINSON: All right. And I have a copy of
17 that public statement that is marked as Grand Jury Exhibit
18 87, but we will mark it as Exhibit--
19 SENATOR THOMPSON: Seven, I believe.
20 SENATOR DODD: We've gone through 9, haven't we?
21 You're marking it. If you're only marking it, I think we--
22 SENATOR THOMPSON: We have six exhibits, didn't
23 we?
24 SENATOR DODD: We've done more than that, haven't
25 we?

1 MR. HUTCHINSON: I have nine.

2 SENATOR DODD: Nine. Did you enter 9, or did you

3 just note it?

4 SENATOR THOMPSON: Six were entered, two were

5 sustained, I think.

6 MS. MILLS: I have seven.

7 SENATOR DODD: Nine, you have here, but we

8 didn't--I don't know if you--you don't have 9 as an exhibit,

9 or just noted?

10 MR. GRIFFITH: Nine was Grand Jury 44.

11 MR. HUTCHINSON: We just noted it, I believe.

12 SENATOR DODD: You didn't ask that it be entered

13 in the record?

14 MR. HUTCHINSON: I believe that's correct.

15 SENATOR DODD: Yes.

16 SENATOR THOMPSON: How about those we sustained

17 objections to? That doesn't count.

18 SENATOR DODD: Well, they're still marked.

19 SENATOR THOMPSON: They were marked?

20 SENATOR DODD: So which one should this be? Ten?

21 SENATOR THOMPSON: This will be 10?

22 SENATOR DODD: This is 10, then.

23 MR. HUTCHINSON: All right, Number 10.

24 [Jordan Deposition Exhibit No.

25 10 marked for identification.]

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1 BY MR. HUTCHINSON:
2 Q Do you have a copy of that, Mr. Jordan?
3 A I have a copy of it. Thank you.
4 Q Thank you. Now, prior to making this public
5 statement, did you consult with the President's attorney,
6 Mr. Bob Bennett?
7 A I did not, not about this statement.
8 Q Did you consult with the President's attorney, Mr.
9 Bob Bennett?
10 A I did not consult with him. Mr. Bennett came to
11 my office and met with me and my attorney, Mr. Hundley, in
12 my office.
13 Q All right. And that was sometime prior to making
14 this statement?
15 A That is correct.
16 Q And it would be--and it would have been between
17 the 19th and the 22nd?
18 A That is correct.
19 Q It would have been after all of the public
20 issues--
21 A It was after--
22 Q --came up?
23 A --I returned from Washington, and it may have
24 been--from New York--and it may have been, I think,
25 Wednesday afternoon.

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1 Q Now, in this statement, you indicated that you
2 referred Ms. Lewinsky for interviews at American Express and
3 at Revlon.
4 A That is correct, and Young & Rubicam.
5 Q And in fact, as your testimony today indicates,
6 you did more than refer her for interviews, did you not?
7 A Explain what you mean, and I'll be happy to
8 answer.
9 Q Well, in fact, when the interview went poorly,
10 according to Ms. Lewinsky, you made calls to get her a
11 second interview and to make it happen.
12 A That is safe to say.
13 Q All right. And I think you've also described your
14 involvement in the job search as running the job search?
15 A Yes.
16 Q And so it was a little bit more than simply
17 referring her for interviews. Is that a fair statement?
18 A That's a fair statement.
19 Q And then, in this statement, you also indicate
20 that "Ms. Lewinsky was referred to me by Ms. Betty Currie"--
21 A Yes.
22 Q --is that correct?
23 A That is correct.
24 Q And in fact, you were acting, as you stated, at
25 the behest of the President?

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1 A Through Ms. Currie. I'm satisfied with this
2 statement as correct.
3 Q So--but you were acting in the job search at the
4 behest of the President, as you have previously testified?
5 A I've testified to that.
6 MR. HUTCHINSON: Now, we would offer this as
7 Exhibit No. 10.
8 SENATOR THOMPSON: Without objection, it will be
9 made a part of the record.
10 [Jordan Deposition Exhibit No.
11 10 received in evidence.]
12 MR. HUNDLEY: The only problem with this line of
13 questioning is I think I wrote that thing.
14 [Laughter.]
15 BY MR. HUTCHINSON:
16 Q After you--after you last testified before the
17 grand jury in June of '98, since then, the President
18 testified before the grand jury in August, and prior to his
19 testimony before the grand jury in August, he made his
20 statement to the Nation in which he--I believe the language
21 was admitted to "an inappropriate relationship with Ms.
22 Lewinsky."
23 Now, at the time that you testified in June of
24 '98, you did not have this information, did you?
25 A He had not made that statement on the 17th of

1 August, that's for sure.

2 Q And was he in fact, to your knowledge, still

3 denying the existence of that relationship?

4 A I think, as I remember the statement, he said he

5 misled the American people.

6 Q And subsequent to this admission, did you talk to

7 your friend, the President of the United States, about his

8 false statements to you?

9 A I have not spoken to him about any false

10 statements, one way or the other.

11 Q Now, you have testified that you in the job search

12 were acting at the behest of the President of the United

13 States; is that correct?

14 A I stand on that.

15 Q And there is no question but that Ms. Monica

16 Lewinsky understood that?

17 A I have to assume that she understood that.

18 Q ~~okay.~~ And in the law, there is the rule of agency

19 and apparent authority. Is it safe to assume that Ms.

20 Lewinsky believed that you had apparent authority on behalf

21 of the President of the United States?

22 A I think I know enough about the law to say that

23 the law of agency is not applicable in this situation where

24 there was a potential romance and not a work situation. I

25 think the law of agency has to do with a work situation and

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1 an employment situation and not having to do with some sort
2 of romance. I think that's right.
3 Q Well, let me take it out of the legal realm.
4 A You raised it--I didn't.
5 Q And let's put it in the realm of mother wit. Ms.
6 Lewinsky is looking to you as a friend of the President of
7 the United States, knowing that you're acting at the behest
8 of the President of the United States. Is it not reasonable
9 to assume that when she communicates something to you or she
10 hears something from you, that it's as if she is talking to
11 someone who is acting for the President?
12 A No. When she's talking to me, she's talking to
13 me, and I can only speak for me and act for me.
14 MR. HUTCHINSON: Could I have just a moment?
15 SENATOR THOMPSON: Yes.
16 MR. HUTCHINSON: At this time, Your Honors, the
17 House Managers would reserve the balance of its time.
18 SENATOR THOMPSON: Counsel?
19 MR. HUNDLEY: Fine.
20 SENATOR THOMPSON: All right.
21 MR. HUTCHINSON: Thank you, Mr. Jordan.
22 THE WITNESS: Thank you, Mr. Hutchinson.
23 SENATOR THOMPSON: Mr. Kendall?
24 EXAMINATION BY COUNSEL FOR THE PRESIDENT
25 BY MR. KENDALL

1 Q Mr. Jordan, is there anything you think it
2 appropriate to add to the record?
3 A Mr. Hutchinson, I'd just like to--
4 MR. HUTCHINSON: I'm going to object to the form
5 of that question. I think that even though--and that's not
6 even a leading question; that's an open-ended question that
7 calls for a narrative response. And I think in fairness to
8 the record that that is just simply too broad for this
9 deposition purpose.
10 SENATOR THOMPSON: Mr. Kendall, is there any
11 chance of perhaps your rephrasing the question somewhat?
12 MR. KENDALL: Certainly.
13 BY MR. KENDALL:
14 Q Mr. Jordan, you were asked questions about job
15 assistance. Would you describe the job assistance you have
16 over your career given to people who have come to you
17 requesting help finding a job or finding employment?
18 A Well, I've known about job assistance and have for
19 a very long time. I learned about it dramatically when I
20 finished at Howard University Law School, 1960, to return
21 home to Atlanta, Georgia to look for work. In the process
22 of my--during my senior year, it was very clear to me that
23 no law firm in Atlanta would hire me. It was very clear to
24 me that, uh, I could not get a job as a black lawyer in the
25 city government, the county government, the State government

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1 or the Federal Government.

2 And thanks to my high school bandmaster, Mr.

3 Kenneth Days, who called his fraternity brother, Donald L.

4 Hollowell, a civil rights lawyer, and said, "That Jordan boy

5 is a fine boy, and you ought to consider him for a job at

6 your law firm," that's when I learned about job referral,

7 and that job referral by Kenneth Days, now going to Don

8 Hollowell, got me a job as a civil rights lawyer working for

9 Don Hollowell for $35 a week.

10 I have never forgotten Kenneth Days' generosity.

11 And given the fact that all of the other doors for

12 employment as a black lawyer graduating from Howard

13 University were open to me, that's always--that's always

14 been etched in my heart and my mind, and as a result,

15 because I stand on Mr. Days' shoulders and Don Hollowell's

16 shoulders, I felt some responsibility to the extent that I

17 could be helpful or got in a position to be helpful, that I

18 would do that.

19 And there is I think ample evidence, both in the

20 media and by individuals across this country, that at such

21 times that I have been presented with that opportunity that

22 I have taken advantage of that opportunity, and I think that

23 I have been successful at it.

24 Q Was your assistance to Ms. Lewinsky which you have

25 described in any way dependent upon her doing anything

1 whatsoever in the Paula Jones case?

2 A No.

3 MR. KENDALL: I have no further questions.

4 MR. HUTCHINSON: Nothing further.

5 SENATOR THOMPSON: All right.

6 THE WITNESS: Mr. Chairman, may I be just

7 permitted a moment of personal privilege? I don't know

8 about the rules here, but, uh, I'd like to say something if

9 you would permit.

10 MR. HUTCHINSON: Mr. Chairman--

11 SENATOR THOMPSON: Well, Mr. Jordan, quite

12 frankly, it depends on what the subject matter is and what

13 you'd like--

14 THE WITNESS: Well, it won't be a declaration of

15 war.

16 [Laughter.]

17 SENATOR THOMPSON: Counsel, did you have--

18 MR. HUTCHINSON: I would reserve the objection. I

19 think that's permissible under the rules. So I would state

20 my objection, let him answer it, and if--we can debate that

21 if it becomes an issue in the Senate. I'd like to reserve

22 the objection.

23 SENATOR THOMPSON: All right.

24 THE WITNESS: It's just something I want you, Mr.

25 Hutchinson, and the House Managers to understand about

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1 Vernon Jordan. And that is, you know, it's a very long way
2 from the first public housing project in this country for
3 black people, where I grew up. It's a long way from there
4 to a corner office at Akin Gump. It's a long way from
5 University Homes to the corporate board rooms of America.
6 It's a long way from University Homes to the Oval Office.
7 And I have made that journey understanding one thing, and
8 that is that the only thing I have in this world that
9 belongs to me in fee simple absolute, completely and
10 totally, is my integrity.
11 My corner office at Akin Gump is at best tenuous.
12 My house, my home, is at best tenuous. My bank account, my
13 stocks and my bonds, they are ultimately of no moment.
14 But what matters most to me, and what was taught
15 to me by my mother, is that the only thing that I own
16 totally and completely is my integrity. And my integrity
17 has been on trial here, and I want to tell you that nothing
18 is more important to me than that.
19 The President is my friend. He was before this
20 happened, he is now, and he will be when this is over. But
21 he is not a friend in that I have no friends for whom I
22 would sacrifice my integrity. And I want you to understand
23 that.
24 SENATOR THOMPSON: Thank you, Mr. Jordan.
25 If there is no further question, then this

1 deposition is completed, and we stand adjourned.

2 THE WITNESS: Thank you.

3 THE VIDEOGRAPHER: This concludes the deposition

4 of Vernon E. Jordan, Jr. We are going off the record at

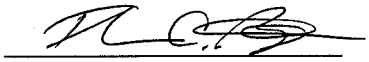
5 1421 hours. The total number of tapes used today is two.

6 [Whereupon, at 2:21 p.m., the deposition was

7 concluded.]

CERTIFICATE

I, **THOMAS C. BITSKO,** the Official Court Reporter for Miller Reporting Company, Inc., hereby certify that I recorded the foregoing proceedings; that the proceedings have been reduced to typewriting by me, or under my direction and that the foregoing transcript is a correct and accurate record of the proceedings to the best of my knowledge, ability and belief.



THOMAS C. BITSKO

CERTIFICATE

I, **CATHY JARDIM,** the Official Court Reporter for Miller Reporting Company, Inc., hereby certify that I recorded the foregoing proceedings; that the proceedings have been reduced to typewriting by me, or under my direction and that the foregoing transcript is a correct and accurate record of the proceedings to the best of my knowledge, ability and belief.

Cathy Jardim

CATHY JARDIM

904

Monica S. Lewinsky
[redacted]

6 November 1997

Mr. Vernon Jordan
Akin, Gump, Strauss, Hauer & Feld
1333 New Hampshire, NW
Washington, DC 20036

Dear Mr. Jordan:

It was a real pleasure meeting with you. I know how very busy and demanding your schedule is; I particularly appreciated your taking the time to speak with me.

I feel compelled to mention how overcome I was by your genuineness. While some people wear their heart on their sleeve; you appear to wear your soul. It made me happy to know that our friend has such a wonderful confidante in you.

I believe I may have neglected to mention that while my current position is administrative, I am seeking more substantive work in my next position.

Thanks again for your time, and I look forward to hearing from you upon your return.

Sincerely,

Monica S. Lewinsky

833-DC-00000980

EXHIBIT
1 Jordan Dep
1

905

First and foremost, thank you for helping me.

My dream had been to work in Communications or Strategic Planning at the White House. I am open to any suggestions that you may have on work that is similar in scope or direction.

It is important to me that I be engaged and challenged in my work; that I not be someone's administrative/executive assistant; and that my salary provide me a comfortable living in NY.

I have enclosed my resume. [Tab 1]

Networks:
- Assistant producer at any of the networks
- Kaplan -- CNN NY Bureau
- News/political segments at MTV

Assistant to an account executive at any of the following (*not* administrative assistant):

- Hill & Knowlton
- Burson-Marsteller
- Downey & Chandler
- Bozell Public Relations/ Bozell Worldwide
- Devries Public Relations

[These are major agencies with which I am familiar. You may have more suggestions from the attached list of agencies in NY (Tab 2)].

A note about the UN:

The idea of working at the UN does not appeal to me. As a result of what happened in April '96, I have already spent a year and a half at an agency which was not in my area of interest. I want a job where I feel challenged and engaged. I don't think it is the right place for me.

833-DC-00000981

Salary:

While my current salary as a GS-9 step 2 is $32,736, my research shows that my counterparts at the Pentagon are *all* GS-12's with salary levels ranging $45,939 - $59,725 depending upon their step number. (It is a mystery to me too why I am not a GS-12 when we all perform the same duties!) Therefore, I do not think it inappropriate to request a salary of

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$65,000. My friends in NY have advised me that living expenses are high. It's important to have an adequate salary. [Tab 3]

Another note: I hope you will understand when I say I prefer that Marsha not be involved in this endeavor. Please respect that.

Again, thanks for everything.

833-DC-00000984

GRAND JURY EXHIBIT
GEJ-40

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

DECEMBER 19th, 1997

TIME PLACED	TIME DISC	NAME	ACTION

1178-DC-00000013

REDACTED

OUT	AM	MR. VERNON E. JORDAN, JR. OFC: WASHINGTON, D.C. [redacted]	MR. VERNON JORDAN TLKD WITH MS. DEBRA SCHIFF 3:51 P.M.
INC 3:51	PM		

EXHIBIT
JORDAN
Dep 3

L 0 004987

OIC - ABS - 0165

GRAND JURY DOCUMENT

Friday 12-19-97 Cont'd

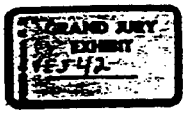
Name	Time of Arrival	Contact
Monica Lewinsky	4:47	V. Jordan

REDACTED DOCUMENT

V004-DC-00000172

EXHIBIT
Jordan Dep 4

1879



THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

DECEMBER 19th, 19 97

	TIME PLACED	TIME DISC	NAME	ACTION
OUT	AM		MR. VERNON E. JORDAN, JR. OPC: WASHINGTON, D.C.	TLKD-OK 5:01 P.M.
IN XX	4:57 PM	5:08	[redacted]	
	AM			

1178-DC-00000014

REDACTED

942-DC-00000317

PARK HYATT - WASHINGTON, D.C
MELROSE

CHECK: 1127
TABLE: 7/1
SERVER: [illegible]
DATE: [illegible]
CARD TYPE: AMERICAN EXPRESS
ACCT #: [illegible]
EXP DATE: [illegible]
AUTH CODE: [illegible]
[illegible]

SUBTOTAL: 27.72
TIP: 6.—
TOTAL: 33.72

I AGREE TO PAY ABOVE TOTAL
AMOUNT ACCORDING TO CARD ISSUER
AGREEMENT
YELLOW TO CUSTOMER COPY

VS 42

PARK HYATT - WASHINGTON, D.C
MELROSE
(202) [illegible]

102 PEDRO 2

7/1 1127 GST 1
DEC31'97 7:42AM

1 O. JUICE	2.75
2 COFFEE	5.00
1 OMELET	9.75
1 ENGLISH MUFFIN	1.60
1 HOT CEREAL	3.75
FOOD SALES	23.25
SERVICE CHARGES	4.00
TAX	2.53
TOTAL PAID	33.78
$ CHARGE TIP	6.00
372807133183002	[illegible]
MR JORDAN	
AMERICAN EXPRESS	33.78
704 CLOSED DEC31	8:47AM

EXHIBIT
6

AFFIDAVIT OF JANE DOE # 6

1. My name is Jane Doe #6 . I am 24 years old anc currently reside at [redacted].

2. On December 19, 1997, I was served with a subpoe from the plaintiff to give a deposition and to produce documents the lawsuit filed by Paula Corbin Jones against President Willi Jefferson Clinton and Danny Ferguson.

3. I can not fathom any reason that the plaintiff wou seek information from me for her case.

4. I have never met Ms. Jones, nor do I have a information regarding the events she alleges occurred at t Excelsior Hotel on May 8, 1991 or any other information concerni any of the allegations in her case.

5. I worked at the White House in the summer of 199 a White House intern. Beginning in December, 1995, I worked in t Office of Legislative Affairs as a staff assistant f correspondence. In April, 1996, I accepted a job as assistant the Assistant Secretary for Public Affairs at the U.S. Departme of Defense. I maintained that job until December 26, 1997. I currently unemployed but seeking a new job.

6. In the course of my employment at the White House met President Clinton several times. I also saw the President at number of social functions held at the White House. When I work as an intern, he appeared at occasional functions attended by and several other interns. The correspondence I drafted while worked at the Office of Legislative Affairs was seen and edited supervisors who either had the President's signature affixed mechanism or, I believe, had the President sign the corresponden itself.

7. I have the utmost respect for the President who h always behaved appropriately in my presence.

8. I have never had a sexual relationship with t President, he did not propose that we have a sexual relationshi he did not offer me employment or other benefits in exchange for sexual relationship, he did not deny me employment or oth benefits for rejecting a sexual relationship. I do not know of a

849-DC-00000314

US-5 3/5/98 290 Supp. 193

other person who had a sexual relationship with the President, w offered employment or other benefits in exchange for a sexu relationship, or was denied employment or other benefits f rejecting a sexual relationship. The occasions that I saw t President after I left my employment at the White House in Apri 1996, were official receptions, formal functions or events relat to the U.S. Department of Defense, where I was working at the tim There were other people present on those occasions.

9. Since I do not possess any information that cou possibly be relevant to the allegations made by Paula Jones or le to admissible evidence in this case, I asked my attorney to provi this affidavit to plaintiff's counsel. Requiring my deposition this matter would cause disruption to my life, especially since am looking for employment, unwarranted attorney's fees and cost and constitute an invasion of my right to privacy.

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

Monica S. Lewinsky

MONICA S. LEWINSKY

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849-DC-00000315

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*

DISTRICT OF COLUMBIA, ss:

MONICA S. LEWINSKY, being first duly sworn on oa according to law, deposes and says that she has read the foregoi AFFIDAVIT OF JANE DOE # 6 by her subscribed, that the matte stated herein are true to the best of her information, knowled and belief.

Monica S Lewinsky
MONICA S. LEWINSKY

SUBSCRIBED AND SWORN to before me this 7th day January, 1998.

Kathleen M. Grimes
NOTARY PUBLIC, D.C.
My Commission expires: My Commission Expires August 31, 1998

849-DC-00000316
242
Aug 1999

STATEMENT BY VERNON JORDAN. FRIEND AND ADVISER TO PRESIDENT CLINTON
TOPIC: INVESTIGATIONS REGARDING THE PRESIDENT
PARK HYATT HOTEL WASHINGTON, DC 3:28 P.M. EST THURSDAY
JANUARY 22, 1998

MR. JORDAN: My name is Vernon Jordan. I first of all want to thank you for coming. And secondly, I want to say that I'm going to read a statement. And after I shall have read my statement, I will not take questions; I'm going to leave and go back to work.

I did two things for Ms. Monica Lewinsky.

I assisted her in trying to find the employment in the private sector in New York City. I referred her for interviews at American Express and at Revlon, where I am privileged to serve as a director. I also referred her to Young and Rubicam, a New York advertising agency.

Secondly, when she was served with the subpoena and -- at her request, I recommended a very competent Washington lawyer, Mr. Frank Carter. I actually took her to Mr. Carter's office, I introduced them, and I returned to my office.

I want to say to you absolutely and unequivocally that Ms. Lewinsky told me in no uncertain terms that she did not have a sexual relationship with the president. At no time did I ever say, suggest or intimate to her that she should lie.

Throughout my professional career, I have been privileged to assist people with their vocational aspirations. I have done so for two reasons. First, I stand on the shoulders of many individuals who have helped me. And second, I believe to whom much is given, much is required. And so I believe in giving a helping hand.

For many years now, and especially since I chaired the Clinton transition in 1992, I am consulted by individuals -- young and old, male and female, black and white, Hispanic and Asian, rich and poor, Cabinet members and secretaries -- for assistance. And I have had some success, from paralegals to mail-room clerks, from corporate directors to CEOs.

I was pleased to be helpful to Ms. Lewinsky, whose drive, ambition and personality were impressive. Ms. Lewinsky was referred to me by Ms. Betty Currie, a secretary to the president.

Yesterday afternoon, I was served a subpoena by the independent counsel, Kenneth W. Starr, to appear before the grand jury. I will answer the grand jury's questions directly, completely and truthfully. I fully appreciate the gravity of this situation. My law partner and friend, Mr. William Hundley (sp), is my lawyer, and Mr. Hundley will represent me in the premises.

Thank you very much.

EXHIBIT
Jordan
Dep 10

Ex. 10 to Affidavit

EXHIBIT
VJ 87

Hutchinson Phone Charts

Deposition Exhibit	Binder Tab	Record Cite
2	29	Vol IV, Pt 2, page 1865 See also: (Vol III, Pt 1, page 157)
8	39	Vol IV, Pt 2, page 1884 See also: (Vol III, Pt 1, page 161)

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Telephone Calls

TABLE 31

December 19, 1997

No.	Time	Call From	Call To	Length of Call
1	1:47 PM	Ms. Lewinsky's office, [redacted]	Mr. Jordan's office, [redacted]	1:50
2	3:51 PM	Mr. Jordan's office, [redacted]	President Clinton; talked with Debra Schiff	1:00
3	4:17 PM	Mr. Jordan's office, [redacted]	White House Social Office, [redacted]	2:42
4	5:01 PM	President Clinton	Mr. Jordan's office, [redacted]	4:30 *
5	5:06 PM	Mr. Jordan's office, [redacted]	Francis Carter's office, [redacted]	1:54

Source Documents

Call 1: 833-DC-00017890 (Pentagon phone records)

Call 2: 1178-DC-00000013 (Presidential call log); V004-DC-00000151 (Akin, Gump, Strauss, Hauer & Feld phone record)

Calls 3 and 5: V004-DC-00000151 (Akin, Gump, Strauss, Hauer & Feld phone record)

Call 4: 1178-DC-00000014 (Presidential call log); V004-DC-00000151 (Akin, Gump, Strauss, Hauer & Feld phone record)

* Presidential call logs indicate that President Clinton placed a call to Mr. Jordan at 4:57 PM and that they talked from 5:01 PM to 5:08 PM. The best interpretation of the evidence suggests that the call did not end at 5:08 PM. The Presidential call logs are maintained by hand, whereas the automated Akin, Gump, Strauss, Hauer & Feld phone records reflect that the conversation actually ended at 5:05 PM.

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Telephone Calls

TABLE 35

January 6, 1998

No.	Time	Call from	Call to	Length of call
1	11:32 AM	Mr. Carter	Ms. Lewinsky's pager; message reads: "PLEASE CALL FRANK CARTER @ [redacted]"	N/A
2	2:08 PM	Mr. Jordan's office, [redacted]	Ms. Lewinsky's residence, [redacted]	1:48
3	3:14 PM	Mr. Carter	Ms. Lewinsky's pager; message reads: "FRANK CARTER AT [redacted] I WILL SEE YOU TOMORROW MORNING AT 10:00 IN MY OFFICE."	N/A
4	3:26 PM	Mr. Jordan's office, [redacted]	Mr. Carter, [redacted]	6:42
5	3:38 PM	Mr. Jordan's office, [redacted]	Ms. Hernreich, White House, [redacted]	2:12
6	3:48 PM	Mr. Jordan's office, [redacted]	Ms. Lewinsky's residence, [redacted]	0:24
7	3:49 PM	Mr. Jordan's office, [redacted]	Ms. Lewinsky at Ms. Finerman's residence, [redacted]	5:54
8	4:19 PM	President Clinton	Mr. Jordan's office, [redacted]	13:00
9	4:32 PM	Mr. Jordan's office, [redacted]	Mr. Carter, [redacted]	1:06
10	4:34 PM	Mr. Jordan's office, [redacted]	Mr. Carter, [redacted]	2:30
11	5:15 PM	Mr. Jordan's office, [redacted]	White House, [redacted]	4:06

Source Documents

Calls 1 and 3: 831-DC-00000010 (Pagemart; all times have been adjusted from Pacific to Eastern Standard Time)

Calls 2, 4, 5, 6, 7, 9, 10, and 11: V004-DC-00000158 (Akin, Gump, Straus, Hauer & Feld call log)

Call 8: 1178-DC-00000016 (Presidential call log)

1

IN THE SENATE OF THE UNITED STATES

SITTING FOR THE TRIAL OF THE

IMPEACHMENT OF WILLIAM JEFFERSON CLINTON,

PRESIDENT OF THE UNITED STATES

VIDEO DEPOSITION OF

SIDNEY BLUMENTHAL

Wednesday, February 3, 1999

Washington, D.C.

The videotaped deposition of SIDNEY BLUMENTHAL, taken pursuant to Senate Resolution 30, convened at 9:15 a.m., in The Capitol, Room S-407, Washington, D.C., when were present on behalf of the parties:

APPEARANCES:

On Behalf of President William Jefferson Clinton:

LANNY A. BREUER, ESQ.
MICHELLE M. PETERSON, ESQ.
Special Counsel to the President
The White House
Washington, D.C. 20510

MAX STIER, ESQ.
Williams & Connolly
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Washington, D.C. 20005

On Behalf of the Managers of the House of Representatives:

HON. JAMES E. ROGAN
HON. LINDSEY O. GRAHAM
HON. ASA HUTCHINSON
HON. CHARLES T. CANADY

APPEARANCES: (continued)

On Behalf of the Deponent Sidney Blumenthal:

WILLIAM A. McDANIEL, ESQ.
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Senators Present:

HON. ARLEN SPECTER
HON. JOHN EDWARDS
HON. CHRISTOPHER J. DODD
HON. MIKE DeWINE
HON. PATRICK J. LEAHY

Senate Counsel Present:

THOMAS GRIFFITH, ESQ.
Legal Counsel
MORGAN FRANKEL, ESQ.
Deputy Legal Counsel
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1522 K Street, N.W., Suite 215
Washington, D.C. 20005

C O N T E N T S

WITNESS	EXAMINATION BY COUNSEL
Sidney Blumenthal	
By Mr. Rogan	10
By Mr. Graham	39
Further By Mr. Graham	72

EXHIBITS

DEPOSITION EXHIBIT NO.	MARKED	ADMITTED
White House Nos. S.B. 1 thru S.B. 7	82	82
Tab Nos. 15 and 20		82
Tab No. 10		83
Tab No. 9		86

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1 P R O C E E D I N G S

2 [9:15 a.m.]

3 THE VIDEOGRAPHER: We are going on the record at
4 9:15 a.m.

5 SENATOR SPECTER: For the record, Arlen Specter,
6 along with my colleague, Senator John Edwards, having been
7 appointed by the Majority Leader and the Democratic Leader
8 of the United States Senate, acting jointly, to preside over
9 this deposition which is being taken in the trial of the
10 impeachment of William Jefferson Clinton, President of the
11 United States.

12 The protocol of the proceedings calls for reading
13 the following format: "The deposition is being conducted
14 pursuant to Senate Resolution 30, which the Senate
15 considered and agreed to on January 28th, 1999. Section 201
16 of that resolution authorized the issuance of a subpoena to
17 Mr. Sidney Blumenthal for the taking of testimony on oral
18 deposition. That subpoena was issued by Chief Justice
19 Rehnquist on Friday, January 29th. Counsel for Mr.
20 Blumenthal agreed to accept service of that subpoena, which
21 was made on the same day."

22 "By unanimous consent of the Senate, the Majority
23 Leader and the Democratic Leader were authorized, acting
24 jointly, to determine the time and place for the taking of
25 the depositions authorized by Senate Resolution 30. The

5

1 Leaders, through Senate Legal Counsel, have conferred with
2 counsel for Mr. Blumenthal, the House Managers and the
3 President's counsel and have determined, again acting
4 jointly, that Mr. Blumenthal's deposition should be--take
5 place on this day, Wednesday, February 3rd, 1999, in this
6 room, S-407, of the Capitol Building beginning at or about
7 9:00 a.m."
8 "By unanimous consent of the Senate, the time
9 allotted for examination of Mr. Blumenthal by the parties
10 shall not exceed 8 hours. Each side may examine Mr.
11 Blumenthal for up to 4 hours. Time consumed by objections
12 shall not be charged to the questioning period."
13 "Senate Legal Counsel shall advise the Presiding
14 Officers of the time spent in questioning by the parties.
15 The Presiding Officers anticipate that a 5-minute break will
16 be taken every hour, and the deposition will recess for 1
17 hour for lunch at approximately 1 p.m. Should the witness
18 desire a recess at any point, he should direct the request
19 to the Presiding Officers who will make every effort to
20 accommodate his request."
21 "At any point, if the reporter or videographer
22 needs a pause in the proceeding for technical reasons,
23 please make that known so we can accommodate you."
24 "According to the terms of Senate Resolution 30,
25 the scope of the examination of Mr. Blumenthal by the

1 parties shall be limited to the subject matter reflected in
2 the Senate record. The questioning will begin first by the
3 House Managers, to be followed by the President's counsel.
4 Subsequent questioning by the parties will be permitted
5 within the time allotted, but the scope of such questioning
6 shall be limited to the subject matter of the prior
7 questioning."
8 "Any objections by counsel for the witness or the
9 parties shall be directed to the Presiding Officer Senators,
10 who shall have authority to rule as an initial matter upon
11 any question arising out of the deposition. Rulings of the
12 Presiding Officers may be appealed to the full Senate
13 following the completion of the deposition. The Senate will
14 consider any such appeals when it next convenes in this
15 impeachment proceeding on Thursday, February 4th."
16 "The reporters shall note any objection upon the
17 record, but the examination shall proceed, and the witness
18 shall answer such question. The witness may refuse to
19 answer a question only when necessary to preserve a legally
20 recognized privilege or constitutional right."
21 "Section 205 of Senate Resolution 30 requires that
22 these depositions be conducted in private. Attendance at
23 this deposition is limited to the witness' counsel and his
24 wife, the House Managers and counsel, counsel for the
25 President, the Presiding Officer Senators, Senate Legal

7

1 Counsel and Deputy Legal Counsel, Senate personnel whose
2 presence is required as determined by the Majority Leader
3 and the Democratic Leader, and those persons whose
4 attendance is required to make and preserve a record of the
5 proceedings."
6 "I note that according to the terms of Section
7 205, all present must maintain the confidentiality of the
8 proceedings. For Senators and Senate employees, they should
9 be aware that this deposition is a confidential proceeding
10 of the Senate, under Senate Rule 29.5. This deposition may
11 be discussed only with Members of the Senate and staff
12 designated by Members. House Managers and House employees
13 may only discuss this deposition with fellow managers and
14 staff designated by the managers. The President's counsel
15 may only discuss this deposition with the President and
16 counsel and staff representing the President in this matter.
17 The witness, his counsel and his wife may only discuss this
18 deposition with each other."
19 "This injunction remains in effect unless ordered
20 otherwise by the United States Senate. Moreover, any record
21 of this deposition made available must similarly be kept
22 confidential until further order of the United States
23 Senate. All persons are admonished to conduct themselves
24 accordingly."
25 "A videotape record and transcription of this

1 deposition are being made and will be made available for
2 view by Members of the Senate, one designated staff member
3 per Senator, the Chief Justice of the United States, the
4 House Managers, the President's counsel and the witness'
5 counsel for their review in connection with the impeachment
6 proceedings."
7 Senator Edwards, would you care to add anything?
8 SENATOR EDWARDS: No, except I think we should
9 emphasize, Senator Specter, the provisions of Section 205
10 and the confidential nature of these proceedings.
11 SENATOR SPECTER: At this time, according to the
12 script, I am inviting everybody present around the table to
13 introduce themselves. Let's start with you.
14 MR. BREUER: I am Lanny Breuer, the Special
15 Counsel to the President, representing the White House.
16 MS. PETERSON: Michelle Peterson, from the White
17 House Counsel's Office.
18 MR. STIER: Max Stier, with Williams & Connolly.
19 MS. MARSH: Jo Bennett Marsh, counsel for Sidney
20 Blumenthal.
21 MR. McDANIEL: William McDaniel, representing Mr.
22 Blumenthal.
23 MR. FRANKEL: Morgan Frankel, Deputy Senate Legal
24 Counsel.
25 MR. GRIFFITH: Tom Griffith, Senate Legal Counsel.

9

1 MR. GRAHAM: Lindsey Graham, House Manager.
2 MR. ROGAN: James E. Rogan, House Manager.
3 SENATOR SPECTER: I also note the presence in the
4 room of our colleagues who have been present at these
5 depositions, Senators Mike DeWine, Fred Thompson, Pat Leahy,
6 Chris Dodd, who have been appointed by the Majority and
7 Minority Leadership.
8 The videographers today are Thomas Olender and
9 Gregory Smith, employed by Video Age of Washington, D.C.
10 The court reporters today are Cathy Jardim and Christopher
11 Bitsko of Miller Reporting Service.
12 Any questions from the parties or counsel?
13 MR. McDANIEL: No, thank you, sir.
14 SENATOR SPECTER: If none, I will swear the
15 witness.
16 Mr. Blumenthal, will you please stand up and raise
17 your right hand?
18 You, Sidney Blumenthal, do swear that the evidence
19 you shall give in this case now pending between the United
20 States and William Jefferson Clinton, President of the
21 United States, shall be the truth, the whole truth, and
22 nothing but the truth, so help you, God?
23 MR. BLUMENTHAL: I do.
24 Whereupon,
25 SIDNEY BLUMENTHAL

1 was called as a witness and, after having been first duly
2 sworn by Senator Specter, was examined and testified as
3 follows:
4 SENATOR SPECTER: Thank you.
5 THE WITNESS: Thank you.
6 SENATOR SPECTER: The House Managers may begin
7 their questioning.
8 MR. ROGAN: Thank you, Senator.
9 EXAMINATION BY HOUSE MANAGERS
10 BY MR. ROGAN:
11 Q Mr. Blumenthal, first, good morning.
12 A Good morning to you.
13 Q My name is Jim Rogan. As you know, I am one of
14 the House Managers and will be conducting this deposition
15 pursuant to authority from the United States Senate.
16 First, as a preliminary matter, we have never had
17 the pleasure of meeting or speaking until this morning,
18 correct?
19 A That's correct.
20 Q If any question I ask is unclear or is in any way
21 ambiguous, if you would please call that to my attention, I
22 will be happy to try to restate it or rephrase the question.
23 A Thank you.
24 Q Mr. Blumenthal, where are you currently employed?
25 A At the White House.

11

1 Q Is that in the Executive Office of the President?
2 A It is.
3 Q What is your current title?
4 A My title is Assistant to the President.
5 Q Was that your title on January 21st, 1998?
6 A It was.
7 Q For the record, that is the date that The
8 Washington Post story appeared that essentially broke the
9 Monica Lewinsky story?
10 A Yes.
11 Q On that date, were you the Assistant to the
12 President as to any specific subject matter?
13 A I dealt with a variety of areas.
14 Q Did your duties entail any specific matter, or
15 were you essentially a jack-of-all-trades at the White House
16 for the President?
17 A Well, I was hired to help the President develop
18 his ideas and themes about the new consensus for the
19 country, and I was hired to deal with problems like the
20 impact of globalization, democracy internationally and
21 domestically, the future of civil society, and the
22 Anglo-American Project; and I also was hired to work on
23 major speeches.
24 Q You testified previously that your duties are such
25 as the President and Chief of Staff shall decide. Would

12

1 that be a fair characterization?

2 A Oh, yes.

3 Q How long have you been employed in this capacity?

4 A Since August 11th, 1997.

5 Q And in the course of your duties, do you

6 personally advise the President as to the matters that you

7 just shared with us?

8 A Yes.

9 Q How often do you meet with the President

10 personally to advise him?

11 A It varies. Sometimes several times a week;

12 sometimes I go without seeing him for a number of weeks at a

13 time.

14 Q Is dealing with the media part of your--your job?

15 A Yes. It's part of my job and part of the job of

16 most people in the White House.

17 Q Was that also one of your responsibilities on

18 January 21st, 1998, when the Monica Lewinsky story broke?

19 A Yes.

20 Q You previously testified that you had a role in

21 the Monica Lewinsky matter after the story broke in The

22 Washington Post on that date, at least in reference to your

23 White House duties; is that correct?

24 A I'm unclear on what you mean by "a role."

25 Q Specifically, you testified that you attended

13

1 meetings in the White House in the Office of Legal Counsel
2 in the morning and in the evening almost every day once the
3 story broke?
4 A Yes.
5 Q And what times did those meetings occur after the
6 story broke, these regular meetings?
7 A The morning meetings occurred around 8:30, after
8 the morning message meeting, and the evening meetings
9 occurred around 6:45.
10 Q Are those meetings still ongoing?
11 A No.
12 Q Can you tell me when those meetings ended?
13 A Oh, I'd say about the time that the impeachment
14 trial started.
15 Q That would be about a month or--about a month ago?
16 A Yeah, something like that.
17 Q Thank you.
18 A I don't recall exactly.
19 Q Sure. But up until that point, were these
20 essentially regularly scheduled meetings, twice a day, 8:30
21 in the morning and 6:45 in the evening?
22 A Right.
23 Q Did you generally attend those meetings?
24 A Generally.
25 Q Now, initially, when you testified before the

14

1 grand jury on February 26th, 1998, your first grand jury
2 appearance, you stated that these twice-daily meetings dealt
3 exclusively with the Monica Lewinsky matter, correct?
4 A They dealt with our press reaction, how we would
5 respond to press reports dealing with it. This was a huge
6 story, and we were being inundated with hundreds of calls.
7 Q Right.
8 A So--
9 Q What I'm--what I'm trying to decipher is that at
10 least initially, at the time of your first grand jury
11 appearance, which was about a month after the story broke--
12 A Right.
13 Q --the meetings were exclusively related to Monica
14 Lewinsky. Is that correct?
15 A Pretty much.
16 Q And then, 4 months later, when you testified
17 before the grand jury in June, you said these meetings were
18 still ongoing, and you referenced them at that time as
19 discussing the policy, political, legal and media impact of
20 scandals and how to deal with them. Do you remember that
21 testimony?
22 A If I could see it.
23 Q Certainly. I'm happy to invite your attention to
24 your grand jury testimony of June 4th, 1998, page 25, lines
25 1 through 5.

15

1 MR. ROGAN: And that would be, for the Senators'
2 and counsel's benefit--I believe that's in Tab 4 of the
3 materials provided.
4 [Witness perusing document.]
5 THE WITNESS: Right. I see it.
6 BY MR. ROGAN:
7 Q You've had a chance to review that, Mr.
8 Blumenthal?
9 A I have.
10 Q And that--that's correct testimony?
11 A Yes.
12 Q Thank you.
13 At the time you spoke of--you used the word
14 "scandals" in the plural, and you were asked on June 4th
15 what other scandals were discussed and you said they range
16 from the Paula Jones trial to our China policy. Is that a
17 fair statement?
18 A Oh, yes, yes. I do.
19 Q Who typically attended those meetings?
20 A As I recall, there were about a dozen or so
21 people, sometimes more, sometimes less.
22 Q Do you remember the names of the people?
23 A I'll try to.
24 Q Would it be helpful if I directed your attention
25 to a couple of passages in the grand jury testimony?

16

1 A Sure, if you'd like.

2 MR. ROGAN: Inviting the Senate and counsel's

3 attention to the February 26th grand jury testimony, page

4 11, lines 2 through 16.

5 [Witness perusing document.]

6 THE WITNESS: Sure. Yeah.

7 BY MR. ROGAN:

8 Q That would be Tab Number 1.

9 A Right, I see that.

10 What it says here is that the names listed are

11 Charles Ruff, Lanny Breuer, who is right over here, Cheryl

12 Mills, Bruce Lindsey, John Podesta, Rahm Emanuel, Paul

13 Begala, Jim Kennedy, Mike McCurry, Joe Lockhart, Ann Lewis,

14 Adam Goldberg, Don Goldberg, and that's--those are the names

15 that I--that I recall.

16 Q Thank you.

17 And just for my benefit, Mr. Ruff, Mr. Breuer, Ms.

18 Mills, and Mr. Lindsey, those are all White House counsel?

19 A Yes.

20 Q Could you just briefly identify for the record the

21 other individuals that are--that are listed in your

22 testimony?

23 A Sure. John Podesta was Deputy Chief of Staff.

24 Rahm Emanuel was a Senior Advisor. Paul Begala had the

25 title of Counselor. Jim Kennedy was in the Legal Counsel

17

1 Office. Mike McCurry was Press Secretary. Joe Lockhart at
2 that time was Deputy Press Secretary. Ann Lewis was
3 Director of Communications, still is. Adam Goldberg worked
4 as a--as an Assistant in the Legal Counsel Office, and Don
5 Goldberg worked in Legislative Affairs.
6 Q Thank you.
7 Mr. Blumenthal, specifically inviting your
8 attention to January 21st, 1998, you testified before the
9 grand jury that on that date, you personally spoke to the
10 President regarding the Monica Lewinsky matter, correct?
11 A Yes.
12 Q When you spoke to the President, did you discuss
13 The Washington Post story about Ms. Lewinsky that appeared
14 that morning?
15 A I don't recall if we talked about that article
16 specifically.
17 Q Do you recall on June 25th testifying before the
18 grand jury, and I'm quoting, "We were speaking about the
19 story that appeared that morning"?
20 A Right. We were--we were speaking about that
21 story, but I don't know if we referred to The Post.
22 Q Thank you.
23 You are familiar with The Washington Post story
24 that broke that day?
25 A I am.

1 Q That story essentially stated that the Office of
2 Independent Counsel was investigating whether the President
3 made false statements about his relationship with Ms.
4 Lewinsky in the Jones case, correct, to the best of your
5 recollection?
6 A If you could repeat that?
7 Q Sure. The story stated that the Office of
8 Independent Counsel was investigating whether the President
9 made false statements about his relationship with Ms.
10 Lewinsky in the Jones case.
11 A Right.
12 Q And also that the Office of Independent Counsel
13 was investigating whether the President obstructed justice
14 in the Jones case. Is that your best recollection of what
15 that story was about?
16 A Yes.
17 Q How did you end up speaking to the President on
18 that specific date?
19 A I don't remember exactly whether he had summoned
20 me or whether I had asked to speak him--to him.
21 Q And I realize, by the way, I--just so you know,
22 I'm not trying to trick you or anything. I realize this is
23 a year later--
24 A Right.
25 Q --and your testimony was many months ago, and so

19

1 if I invite your attention to previous grand jury testimony
2 to refresh your recollection, I don't want you to feel that
3 in any way I'm trying to imply that you're not being candid
4 in your testimony.
5 With that, if I may invite your--your attention to
6 the June 4th grand jury testimony on page 47, lines 5
7 through 6.
8 [Witness perusing document.]
9 BY MR. ROGAN:
10 Q Let me see if this helps to refresh your
11 recollection. You said, "It was about a week before the
12 State of the Union speech."
13 A I see.
14 Q "I was in my office, and the President asked me to
15 come to his office."
16 Does that help to refresh your recollection?
17 A Yes.
18 Q And so you now remember that the President asked
19 to speak with you?
20 A Yes.
21 Q Did you go to the Oval Office?
22 A Yes.
23 Q During that conversation, were you alone with the
24 President?
25 A I was.

20

1 Q Do you remember if the door was closed?
2 A It was.
3 Q When you met with the President, did you relate to
4 him a conversation you had with the First Lady earlier that
5 day?
6 A I did.
7 Q What did you tell the President the First Lady
8 told you earlier that day?
9 A I believe that I told him that the First Lady had
10 called me earlier in the day, and in the light of the story
11 in The Post had told me that the President had helped
12 troubled people in the past and that he had done it many
13 times and that he was a compassionate person and that he
14 helped people also out of his religious conviction and that
15 this was part of--part of his nature.
16 Q And did she also tell you that one of the other
17 reasons he helped people was out of his personal
18 temperament?
19 A Yes. That's what I mean by that.
20 Q And the First Lady also at least shared with you
21 her opinion that he was being attacked for political
22 motives?
23 MR. McDANIEL: Can I get a clarification,
24 Senator--Senator Specter? The earlier question, I thought,
25 had been what Mr. Blumenthal had relayed to the President

21

1 had been said by the First Lady.

2 MR. ROGAN: That's correct.

3 MR. McDANIEL: And now the questions are back--it

4 seems to me have moved to another topic--

5 MR. ROGAN: No. That's--

6 MR. McDANIEL: --which is what--

7 MR. ROGAN: I'm--

8 MR. McDANIEL: --did the First Lady say.

9 MR. ROGAN: And I thank--I thank the gentleman for

10 that clarification. I'm specifically asking what the

11 witness relayed to the President respecting his conversation

12 with--his earlier conversation with the First Lady.

13 MR. McDANIEL: Thank you.

14 Do you understand that, what he said?

15 THE WITNESS: I understand the distinction, and I

16 don't--

17 BY MR. ROGAN:

18 Q I'll restate the question, if that would help.

19 A Please.

20 Q Do you remember telling the President that the

21 First Lady said to you that she felt that with--in reference

22 to this story that he was being attacked for political

23 motives?

24 A I remember her saying that to me, yes.

25 Q And you relayed that to the President?

22

1 A I'm not sure I relayed that to the President. I
2 may have just relayed the gist of the conversation to him.
3 I don't--I'm not sure whether I relayed the entire
4 conversation.
5 MR. ROGAN: Inviting the Senators' and counsel's
6 attention to the June 4th, 1998, testimony of Mr.
7 Blumenthal, page 47, beginning at line 5.
8 BY MR. ROGAN:
9 Q Mr. Blumenthal, let me just read a passage to you
10 and tell me if this helps to refresh your memory.
11 A Mm-hmm.
12 MR. ROGAN: Do you have that, Lanny?
13 MR. BREUER: Yes, I do. Thank you.
14 BY MR. ROGAN:
15 Q Reading at line--at line 5, "I was in my office,
16 and the President asked me to come to the Oval Office. I
17 was seeing him frequently in this period about the State of
18 the Union and Blair's visit"--and I--that was Prime Minister
19 Tony Blair, as an aside, correct?
20 A That's right.
21 Q Thank you.
22 And then again, reading at line 7, "So I went up
23 to the Oval Office and I began the discussion, and I said
24 that I had received--that I had spoken to the First Lady
25 that day in the afternoon about the story that had broke in

23

1 the morning, and I related to the President my conversation
2 with the First Lady and the conversation went as follows.
3 The First Lady said that she was distressed that the
4 President was being attacked, in her view, for political
5 motives for his ministry of a troubled person. She said
6 that the President ministers to troubled people all the
7 time," and then it goes on to--
8 A Right.
9 Q --relate the substance of the answer you just
10 gave.
11 Does that help to refresh your recollection with
12 respect to what you told the President, the First Lady had
13 said earlier?
14 A Yes.
15 Q Thank you.
16 And do you now remember that the First Lady had
17 indicated to you that she felt the President was being
18 attacked for political motives?
19 A Well, I remember she said that to me.
20 Q And just getting us back on track, a few moments
21 ago, I think you--you shared with us that the First Lady
22 said that the President helped troubled people and he had
23 done it many times in the past.
24 A Yes.
25 Q Do you remember testifying before the grand jury

1 on that subject, saying that the First Lady said he has done
2 this dozens, if not hundreds, of times with people--
3 A Yes.
4 Q --with troubled people?
5 A I recall that.
6 Q After you related the conversation that you had
7 with the First Lady to the President, what do you remember
8 saying to the President next about the subject of Monica
9 Lewinsky?
10 A Well, I recall telling him that I understood he
11 felt that way, and that he did help people, but that he
12 should stop trying to help troubled people personally; that
13 troubled people are troubled and that they can get you in a
14 lot of messes and that you had to cut yourself off from it
15 and you just had to do it. That's what I recall saying to
16 him.
17 Q Do you also remember in that conversation saying
18 to him, "You really need to not do that at this point, that
19 you can't get near anybody who is even remotely crazy.
20 You're President"?
21 A Yes. I think that was a little later in the
22 conversation, but I do recall saying that.
23 Q When you told the President that he should avoid
24 contact with troubled people, what did the President say to
25 you in response?

25

1 A I'm trying to remember the sequence of it. He--he
2 said that was very difficult for him. He said he--he felt a
3 need to help troubled people, and it was hard for him to--to
4 cut himself off from doing that.
5 Q Do you remember him saying specifically, "It's
6 very difficult for me to do that, given how I am. I want to
7 help people"?
8 A I recall--I recall that.
9 Q And when the President referred to trying to help
10 people, did you understand him in that conversation to be
11 referring to Monica Lewinsky?
12 A I think it included Monica Lewinsky, but also many
13 others.
14 Q Right, but it was your understanding that he was
15 all--he was specifically referring to Monica Lewinsky in
16 that list of people that he tried to help?
17 A I believe that--that was implied.
18 Q Do you remember being asked that question before
19 the grand jury and giving the answer, "I understood that"?
20 A If you could point it out to me, I'd be happy to
21 see it.
22 Q Certainly.
23 MR. ROGAN: Inviting the Senators' and counsel's
24 attention to the June 25th, 1998, grand jury, page 5, I
25 believe it's at lines 6 through 8.

1 [Witness perusing document.]
2 THE WITNESS: Yes, I see that. Thank you.
3 BY MR. ROGAN:
4 Q You recall that now?
5 A Yes.
6 Q Thank you.
7 Mr. Blumenthal, did the President then relate a
8 conversation he had with Dick Morris to you?
9 A He did.
10 Q What was the substance of that conversation, as
11 the President related it to you?
12 A He said that he had spoken to Dick Morris earlier
13 that day, and that Dick Morris had told him that if Nixon,
14 Richard Nixon, had given a nationally televised speech at
15 the beginning of the Watergate affair, acknowledging
16 everything he had done wrong, he may well have survived it,
17 and that was the conversation that Dick Morris--that's what
18 Dick Morris said to the President.
19 Q Did it sound to you like the President was
20 suggesting perhaps he would go on television and give a
21 national speech?
22 A Well, I don't know. I didn't know.
23 Q And when the President related the substance of
24 his conversation with Dick Morris to you, how did you
25 respond to that?

27

1 A I said to the President, "Well, what have you done
2 wrong?"
3 Q Did he reply?
4 A He did.
5 Q What did he say?
6 A He said, "I haven't done anything wrong."
7 Q And what did you say to that response?
8 A Well, I said, as I recall, "That's one of the
9 stupidest ideas I ever heard. If you haven't done anything
10 wrong, why would you do that?"
11 Q Did the President then give you his account of
12 what happened between him and Monica Lewinsky?
13 A As I recall, he did.
14 Q What did the President tell you?
15 A He, uh--he spoke, uh, fairly rapidly, as I recall,
16 at that point and said that she had come on to him and made
17 a demand for sex, that he had rebuffed her, turned her down,
18 and that she, uh, threatened him. And, uh, he said that she
19 said to him, uh, that she was called "the stalker" by her
20 peers and that she hated the term, and that she would claim
21 that they had had an affair whether they had or they hadn't,
22 and that she would tell people.
23 Q Do you remember him also saying that the reason
24 Monica Lewinsky would tell people that is because then she
25 wouldn't be known by her peers as "the stalker" anymore?

1 A Yes, that's right.
2 Q Do you remember the President also saying that--
3 and I'm quoting--"I've gone down that road before. I've
4 caused pain for a lot of people. I'm not going to do that
5 again"?
6 A Yes. He told me that.
7 Q And that was in the same conversation that you had
8 with the President?
9 A Right, in--in that sequence.
10 Q Can you describe for us the President's demeanor
11 when he shared this information with you?
12 A Yes. He was, uh, very upset. I thought he was, a
13 man in anguish.
14 Q And at that point, did you repeat your earlier
15 admonition to him as far as not trying to help troubled
16 people?
17 A I did. I--I think that's when I told him that you
18 can't get near crazy people, uh, or troubled people. Uh,
19 you're President; you just have to separate yourself from
20 this.
21 Q And I'm not sure, based on your testimony, if you
22 gave that admonition to him once or twice. Let me--let me
23 clarify for you why my questioning suggested it was twice.
24 In your grand jury testimony on June the 4th, at page 49,
25 beginning at line 25, you began the sentence by saying, and

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1 I quote, "And I repeated to the President"--
2 A Right.
3 Q --"that he really needed never to be near people
4 who were"--
5 A Right.
6 Q --"troubled like this," and so forth. Do you
7 remember now if you--if that was correct? Did you find
8 yourself in that conversation having to repeat the
9 admonition to him that you'd given earlier?
10 A I'm sure I did. Uh, I felt--I felt that pretty
11 strongly. He shouldn't be involved with troubled people.
12 Q Do you remember the President also saying
13 something about being like a character in a novel?
14 A I do.
15 Q What did he say?
16 A Uh, he said to me, uh, that, uh, he felt like a
17 character in a novel. Uh, he felt like somebody, uh,
18 surrounded by, uh, an oppressive environment that was
19 creating a lie about him. He said he felt like, uh, the
20 character in the novel Darkness at Noon.
21 Q Did he also say he felt like he can't get the
22 truth out?
23 A Yes, I--I believe he said that.
24 Q Politicians are always loathe to confess their
25 ignorance, particularly on videotape. I will do so. I'm

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1 unfamiliar with the novel Darkness at Noon. Did you--do you
2 have any familiarity with that, or did you understand what
3 the President meant by that?
4 A I--I understood what he meant. I--I was familiar
5 with the book.
6 Q What--what did he mean by that, per your
7 understanding?
8 a Uh, the book is by Arthur Koestler, who was
9 somebody who had been a communist and had become
10 disillusioned with communism. And it's an anti-communist
11 novel. It's about, uh, uh, the Stalinist purge trials and
12 somebody who was a loyal communist who then is put in one of
13 Stalin's prisons and held on trial and executed, uh, and
14 it's about his trial.
15 Q Did you understand what the President was trying
16 to communicate when he related his situation to the
17 character in that novel?
18 A I think he felt that the world was against him.
19 Q I thought only Members of Congress felt that way.
20 Mr. Blumenthal, did you ever ask the President if
21 he was ever alone with Monica Lewinsky?
22 A I did.
23 Q What was his response?
24 A I asked him a number of questions that appeared in
25 the press that day. I asked him, uh, if he were alone, and

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1 he said that, uh, he was within eyesight or earshot of
2 someone when he was with her.
3 Q What other questions do you remember asking him?
4 A Uh, there was a story in the paper that, uh, there
5 were recorded messages, uh, left by him on her voice-mail
6 and I asked him if that were true.
7 Q What did he say?
8 A He said, uh, that it was, that, uh, he had called
9 her.
10 Q You had asked him about a press account that said
11 there were potentially a number of telephone messages left
12 by the President for Monica Lewinsky. And he relayed to you
13 that he called her. Did he tell you how many times he
14 called her?
15 A He--he did. He said he called once. He said he
16 called when, uh, Betty Currie's brother had died, to tell
17 her that.
18 Q And other than that one time that he shared that
19 information with you, he shared no other information
20 respecting additional calls?
21 A No.
22 Q He never indicated to you that there were over 50
23 telephone conversations between himself and Monica Lewinsky?
24 A No.
25 Q Based on your conversation with the President at

1 that time, would it have surprised you to know that there
2 were over 50--there were records of over 50 telephone
3 conversations with Monica Lewinsky and the President?
4 A Would I have been surprised at that time?
5 Q Yes.
6 A Uh, I--to see those records and if he--I don't
7 fully grasp the question here. Could you--would I have been
8 surprised?
9 Q Based on the President's response to your question
10 at that time, would it have surprised you to have been told
11 or to have later learned that there were over 50 recorded--
12 50 conversations between the President and Ms. Lewinsky?
13 A I did later learn that, uh, as the whole country
14 did, uh, and I was surprised.
15 Q When the President told you that Monica Lewinsky
16 threatened him, did you ever feel compelled to report that
17 information to the Secret Service?
18 A No.
19 Q The FBI or any other law enforcement organization?
20 A No.
21 Q I'm assuming that a threat to the President from
22 somebody in the White House would normally send off alarm
23 bells among staff.
24 A It wouldn't--
25 MR. McDANIEL: Well, I'd like to object to the

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1 question, Senator. There's no testimony that Mr. Blumenthal
2 learned of a threat contemporaneously with it being made by
3 someone in the White House. This is a threat that was
4 relayed to him sometime afterwards by someone who was no
5 longer employed in the White House. So I think the question
6 doesn't relate to the testimony of this witness.
7 MR. ROGAN: Respectfully, I'm not sure what the
8 legal basis of the objection is. The evidence before us is
9 that the President told the witness that Monica Lewinsky
10 threatened him.
11 [Senators Specter and Edwards conferring.]
12 SENATOR SPECTER: We've conferred and overrule the
13 objection on the ground that it calls for an answer; that,
14 however the witness chooses to answer it, was not a
15 contemporaneous threat, or he thought it was stale, or
16 whatever he thinks. But the objection is overruled.
17 MR. ROGAN: Thank you.
18 BY MR. ROGAN:
19 Q Let me--let me restate the question, if I may.
20 Mr. Blumenthal, would a threat--
21 SENATOR SPECTER: We withdraw the ruling.
22 [Laughter.]
23 MR. McDANIEL: I withdraw my objection, then.
24 [Laughter.]
25 MR. ROGAN: Senator Specter, the ruling is just

1 fine by my light. I'm just going to try to simplify the
2 question for the witness' benefit.
3 SENATOR SPECTER: We'll hold in abeyance a
4 decision on whether to reinstate the ruling.
5 MR. ROGAN: Thank you. Maybe I should just quit
6 while I'm ahead and have the question read back.
7 BY MR. ROGAN:
8 Q Basically, Mr. Blumenthal, what I'm asking is, I
9 mean, normally, would a threat from somebody against the
10 President in the White House typically require some sort of
11 report being made to a law enforcement agency?
12 A Uh, in the abstract, yes.
13 Q This conversation that you had with the President
14 on January the 21st, 1998, how did that conversation
15 conclude?
16 A Uh, I believe we, uh--well, I believe after that,
17 I said to the President that, uh--who was--seemed to me to
18 be upset, that you needed to find some sure footing and to
19 be confident. And, uh, we went on, I believe, to discuss
20 the State of the Union.
21 Q You went on to other business?
22 A Yes, we went on to talk about public policy.
23 Q When this conversation with the President
24 concluded as it related to Monica Lewinsky, what were your
25 feelings toward the President's statement?

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1 A Uh, well, they were complex. Uh, I believed him,
2 uh, but I was also, uh--I thought he was very upset. That
3 troubled me. And I also was troubled by his association
4 with troubled people and thought this was not a good story
5 and thought he shouldn't be doing this.
6 Q Do you remember also testifying before the grand
7 jury that you felt that the President's story was a very
8 heartfelt story and that "he was pouring out his heart, and
9 I believed him"?
10 A Yes, that's what I told the grand jury, I believe;
11 right.
12 Q That was--that was how you interpreted the
13 President's story?
14 A Yes, I did. He was, uh--he seemed--he seemed
15 emotional.
16 Q When the President told you he was helping Monica
17 Lewinsky, did he ever describe to you how he might be
18 helping or ministering to her?
19 A No.
20 Q Did he ever describe how many times he may have
21 tried to help or minister to her?
22 A No.
23 Q Did he tell you how many times he visited with
24 Monica Lewinsky?
25 A No.

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1 Q Did he tell you how many times Monica Lewinsky
2 visited him in the Oval Office complex?
3 A No.
4 Q Did he tell you how many times he was alone with
5 Monica Lewinsky?
6 A No.
7 Q He never described to you any intimate physical
8 activity he may have had with Monica Lewinsky?
9 A Oh, no.
10 Q Did the President ever tell you that he gave any
11 gifts to Monica Lewinsky?
12 A No.
13 Q Did he tell you that Monica Lewinsky gave him any
14 gifts?
15 A No.
16 Q Based on the President's story as he related on
17 January 21st, would it have surprised you to know at that
18 time that there was a repeated gift exchange between Monica
19 Lewinsky and the President?
20 A Well, I learned later about that, and I was
21 surprised.
22 Q The President never told you that he engaged in
23 occasional sexual banter with her on the telephone?
24 A No.
25 Q He never told you about any cover stories that he

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1 and Monica Lewinsky may have developed to disguise a
2 relationship?
3 A No.
4 Q He never suggested to you that there might be some
5 physical evidence pointing to a physical relationship
6 between he--between himself and Monica Lewinsky?
7 A No.
8 Q Did the President ever discuss his grand jury--or
9 strike that.
10 Did the President ever discuss his deposition
11 testimony with you in the Paula Jones case on that date?
12 A Oh, no.
13 Q Did he ever tell you that he denied under oath in
14 his Paula Jones deposition that he had an affair with Monica
15 Lewinsky?
16 A No.
17 Q Did the President ever tell you that he ministered
18 to anyone else who then made a sexual advance toward him?
19 A No.
20 Q Mr. Blumenthal, after you testified before the
21 grand jury, did you ever communicate to the President the
22 questions that you were asked?
23 A No.
24 Q After you testified before the grand jury, did you
25 ever communicate to the President the answers which you gave

1 to those questions?
2 A No.
3 Q After you were subpoenaed to testify but before
4 you testified before the Federal grand jury, did the
5 President ever recant his earlier statements to you about
6 Monica Lewinsky?
7 A No.
8 Q After you were subpoenaed but before you testified
9 before the federal grand jury, did the President ever say
10 that he did not want you to mislead the grand jury with a
11 false statement?
12 A No. We didn't have any subsequent conversation
13 about this matter.
14 Q So it would be fair also to say that after you
15 were subpoenaed but before you testified before the Federal
16 grand jury, the President never told you that he was not
17 being truthful with you in that January 21st conversation
18 about Monica Lewinsky?
19 A Uh, he never spoke to me about that at all.
20 Q The President never instructed you before your
21 testimony before the grand jury not to relay his false
22 account of his relationship with Monica Lewinsky?
23 A We--we didn't speak about anything.
24 Q And as to your testimony on all three appearances
25 before the grand jury on February 26th, June 4th and June

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1 25th, 1998--as an aside, by the way, let me just say I think
2 this question has been asked of all the witnesses, so this
3 is not peculiar to you--but as to those three grand jury
4 appearances, do you adopt as truth your testimony on all
5 three of those occasions?
6 A Oh, yes.
7 MR. ROGAN: If I may have a moment?
8 SENATOR SPECTER: Of course. Would you like a
9 short break?
10 MR. ROGAN: That might be convenient, Senator.
11 SENATOR SPECTER: All right. It's a little past
12 10. We'll take a 5-minute recess.
13 THE VIDEOGRAPHER: We're going off the record at
14 10 o'clock a.m.
15 [Recess.]
16 THE VIDEOGRAPHER: We're going back on the record
17 at 10:12 a.m.
18 SENATOR SPECTER: We shall proceed; Mr. Graham
19 questioning for the House Managers.
20 MR. GRAHAM: Thank you, Senator.
21 BY MR. GRAHAM:
22 Q Again, Mr. Blumenthal, if I ask you something
23 that's confusing, just slow me down and straighten me out
24 here.
25 A Thank you.

1 Q Okay. I'm going to ask as direct, to-the-point
2 questions as I can so we all can go home.
3 June 4th, 1998, when you testified to the grand
4 jury, on page 49--I guess it's page 185 on tab 4.
5 MR. McDANIEL: Page 49?
6 MR. GRAHAM: Yes, sir.
7 MR. McDANIEL: Thank you.
8 BY MR. GRAHAM:
9 Q That's where you start talking about the story
10 that the President told you. Knowing what you know now, do
11 you believe the President lied to you about his relationship
12 with Ms. Lewinsky?
13 A I do.
14 Q I appreciate your honesty. You had raised
15 executive privilege at some time in the past, I believe.
16 MR. McDANIEL: I object, Senator. Mr. Blumenthal
17 was a passive vessel for the raising of executive privilege
18 by the President. It's not his privilege to assert, so the
19 question, I think, is misleading.
20 BY MR. GRAHAM:
21 Q At any time--I'm sorry.
22 [Senators Specter and Edwards conferring.]
23 SENATOR SPECTER: Senator Edwards and I have
24 conferred and believe that he can answer the question if he
25 did not raise the privilege, so we will overrule the

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1 objection.

2 SENATOR EDWARDS: Either he asserted it or it was

3 asserted on his behalf.

4 THE WITNESS: If you could repeat it, please.

5 BY MR. GRAHAM:

6 Q I believe early on in your testimony and

7 throughout your testimony to the grand jury, the idea of

8 executive privilege covering your testimony or conversations

9 with the President was raised. Is that correct?

10 A It was.

11 Q Do you believe the White House knew that this

12 privilege would be asserted in your testimony? That was no

13 surprise to them?

14 A Uh--

15 MR. BREUER: I'm going to object. It's the White

16 House's privilege to assert it could not have been

17 surprised. It's a mischaracterization of the facts.

18 [Senators Specter and Edwards conferring.]

19 SENATOR SPECTER: Senator Edwards and I believe

20 the objection is well-founded on the ground that he cannot

21 testify as to what someone else knew. So would you rephrase

22 the question? The objection will be sustained.

23 BY MR. GRAHAM:

24 Q When executive privilege was asserted, do you know

25 how it came about? Do you have any knowledge of how it came

1 about?

2 A What I recall is that I--in my first appearance

3 before the grand jury, I was asked questions about my

4 conversations with the President. And I went out into the

5 hall, asked if I could go out in the hall, and I spoke with

6 the White House legal counsel who was there, Cheryl Mills,

7 and said, "What do I say?"

8 Q And she said?

9 A And I was advised to assert privilege.

10 Q So the executive privilege assertion came about

11 from advice to you by White House counsel?

12 A Yes.

13 Q Now, you've stated, I think, very honestly, and I

14 appreciate, that you were lied to by the President. Is it a

15 fair statement, given your previous testimony concerning

16 your 30-minute conversation, that the President was trying

17 to portray himself as a victim of a relationship with Monica

18 Lewinsky?

19 A I think that's the import of his whole story.

20 Q During this period of time, the Paula Jones

21 lawsuit, other allegations about relationships with the

22 President and other women were being made and found their

23 way in the press. Is that correct?

24 A Yes.

25 Q Now, when you have these morning meetings and

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1 evening meetings about press strategy, I believe your
2 previous testimony goes along the lines that any time a
3 press report came out about a story between the President
4 and a woman, that you would sit down and strategize about
5 what to do. Is that correct?
6 A Well, we would, uh, talk about what the White
7 House spokesman would say about it.
8 Q Does the name "Kathleen Willey" mean anything to
9 you in that regard?
10 MR. BREUER: I'm going to object. It's beyond the
11 scope of this deposition. In the proffer from the Managers,
12 they explicitly state the areas that they want to go into,
13 and they explicitly state that they want to speak to Mr.
14 Blumenthal about his January 21, 1998, conversation with the
15 President about Monica Lewinsky. And any aspects as to
16 Kathleen Willey are--have nothing to do with the Articles of
17 Impeachment, nor do they have anything to do with the
18 proffer made by the Managers, and it's beyond the scope of
19 this deposition.
20 SENATOR SPECTER: Just wait one second.
21 [Senators Specter and Edwards conferring.]
22 SENATOR SPECTER: Mr. Graham, as you know, the
23 scope of the examination of Mr. Blumenthal is limited by the
24 subject matters reflected in the Senate record. Are you
25 able to substantiate the Senate record as a basis for asking

1 the question?

2 MR. GRAHAM: I'm assuming, yes, Senator, that the

3 grand jury testimony of Mr. Blumenthal is part of the Senate

4 record. And on June 25th, 1998, on page 21, there's a

5 discussion between Mr. Blumenthal and the Independent

6 Counsel's Office about strategy meetings and other women,

7 and in that testimony, he mentions that "we discussed Paula

8 Jones, Kathleen Willey, in our strategy meeting."

9 And I think the question will not be as ominous as

10 some may think it sounds. I think I can get right to the

11 point pretty quickly about what I'm trying to do with--

12 SENATOR SPECTER: Well, would you make an offer of

13 proof so that we can see what the scope is that you have in

14 mind?

15 MR. GRAHAM: Basically, his testimony is that when

16 a press report came about concerning Ms. Jones or Kathleen

17 Willey or a relationship between the President and another

18 woman, they sat down and strategized about how to respond to

19 those press accounts, what to do and what to say--at least

20 that's what his testimony indicates. And I just want to ask

21 him, once the January 21st story about Ms. Lewinsky came

22 out, how they discussed her in relationship to other

23 strategy meetings.

24 SENATOR SPECTER: Mr. Breuer, how would you

25 respond to Congressman Graham's statement that as he refers

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1 to a reference to Ms. Willey in the record?

2 MR. BREUER: Senator, I haven't seen the one

3 reference, but I may--I would acknowledge that there may be

4 one passing reference to Ms. Willey in the voluminous

5 materials that are before us here in the grand jury,

6 Senator. But it's clearly not germane to this deposition.

7 It's clearly not germane to the proffer made by the Managers

8 about why Mr. Sidney Blumenthal was a witness. It is

9 clearly not germane to the Articles of Impeachment.

10 And, indeed, in Mr. Lindsey Graham's proffer just

11 now, he said that he wants to go back and ask about the

12 January 21 conversation. It's my view that Kathleen Willey

13 is tangential, at best, and is not germane to this

14 deposition and ought not to be inquired into.

15 SENATOR EDWARDS: And, Senator Specter, I would

16 ask that we go off the record for this discussion, given the

17 question of whether this is within the scope of the Senate

18 record.

19 SENATOR SPECTER: We shall go off the record.

20 THE VIDEOGRAPHER: We're going off the record at

21 10:20 a.m.

22 [Discussion off the record.]

23 THE VIDEOGRAPHER: We're going back on the record

24 at 10:48 a.m.

25 SENATOR SPECTER: Congressman Lindsey, you may

1 proceed.

2 MR. GRAHAM: Thank you, sir.

3 BY MR. GRAHAM:

4 Q Thank you for your patience, Mr. Blumenthal. I

5 appreciate it.

6 A Thank you.

7 Q Let's get back to the--we'll approach this topic

8 another way and well try to tie it up at the end here.

9 The January 21st article breaks, and I think it's

10 in The Washington Post, is that correct, the January 21st

11 article about Ms. Lewinsky being on tape, talking about her

12 relationship with the President? Are you familiar with that

13 article?

14 A I'm familiar with an article on January 21st in

15 The Washington Post.

16 Q And what--what was the essence of that article, as

17 you remember it?

18 A If you have it there, I'd be happy to look at it.

19 Q Yeah. Let's see if we can find it, what tab that

20 is. Tab 7.

21 [Witness perusing document.]

22 THE WITNESS: Well--

23 BY MR. GRAHAM:

24 Q If you'd like a chance to read it over, just take

25 your time.

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1 A Yes. Thank you.
2 [Witness perusing document.]
3 THE WITNESS: It's a long article.
4 BY MR. GRAHAM:
5 Q Yes, sir, it is, and just--
6 A Yeah.
7 Q --just take your time. I'm not going to give you
8 a test on the article. I just wanted--
9 A No. I just wanted to read it.
10 Q --to refresh your memory. Absolutely, you take
11 your time.
12 A I hope you don't mind if I took the time here.
13 Q No, sir. Are you--you're okay now?
14 A I am.
15 Q Okay. In essence, what this article is--is
16 alleging is what we now know, the allegations that Ms.
17 Lewinsky had a relationship with the President, that Mr.
18 Jordan was trying to help her secure counsel, to file an
19 affidavit saying they had no relationship, and the
20 relationship on January 21st was being exposed through some
21 tape recordings, supposedly, the Independent Counsel had
22 access to between Ms. Lewinsky and Ms. Tripp. Is that
23 correct?
24 A Well, there are a lot of questions in there.
25 Q Okay, yeah, and I'm sorry.

1 This article seems to suggest that Ms. Lewinsky is
2 telling a friend--
3 A Mm-hmm.
4 Q --that she has a relationship with the President,
5 a sexual relationship with the President.
6 A Mm-hmm.
7 Q You understand that from the article?
8 A Yes.
9 Q This article also alleges that an affidavit was
10 filed by Ms. Lewinsky denying that relationship, and Mr.
11 Jordan sought an attorney for her, a friend of the
12 President. Is that correct?
13 A It says she filed an affidavit, and I'm just
14 looking for where it says that Jordan had secured the
15 attorney.
16 Q The very first paragraph, let me read it. "The
17 Independent Counsel Kenneth Starr has expanded his
18 investigation of President Clinton to examine whether
19 Clinton and his close friend, Vernon Jordan, encouraged a
20 24-year-old"--
21 A Right.
22 Q --"former White House intern to lie to lawyers for
23 Paula Jones about whether the intern had an affair with the
24 President, sources close to the investigation said
25 yesterday."

1 A Right.
2 Q So I guess that first paragraph kind of sums up
3 the accusation.
4 A I think--
5 Q What type reaction did the White House have when
6 this--as you recall--when this article came to light?
7 A I--I think the White House was overwhelmed with
8 press inquiries.
9 Q Was there a sense of alarm that this was a bad
10 story?
11 A Yes.
12 Q And wasn't there a sense of reassurance by the
13 President himself that this was an untrue story?
14 A The President did make a public statement that
15 afternoon.
16 Q And I believe White House officials on his behalf
17 denied the essence of this story; is that correct?
18 A Yes.
19 Q And basically, you were passing along what
20 somebody you trust and admire told you to be the case, and
21 from the White House point of view, that was the response to
22 this story, that we deny these allegations.
23 MR. McDANIEL: Senator, I really object to the
24 question where we mix "you" and "we" and the "White House."
25 I'd like, if possible, for the question--if they want to

1 know what Mr. Blumenthal did, to ask him what he did, and
2 questions about what the White House did and what we and you
3 did.
4 MR. GRAHAM: That's fair enough.
5 MR. McDANIEL: Okay, we thank you.
6 SENATOR SPECTER: We think that's well-founded.
7 MR. GRAHAM: Yes, and I agree. I agree that is
8 well-founded.
9 BY MR. GRAHAM:
10 Q Did you have any discussions with White House
11 press people about the nature of this relationship after
12 this article broke?
13 A No.
14 Q Did you have any discussions with White House
15 lawyers after this article broke about the nature of the
16 relationship?
17 A No.
18 Q After you had the conversation with the President,
19 sometime the week of the 21st--I believe that's your
20 testimony--shortly after the news story broke, this
21 30-minute conversation where he tells you about--
22 A There's not a question.
23 Q Okay. Is that correct? When did you have this
24 conversation with the President? Do you recall?
25 A Yes. It was in the early evening of January 21st.

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1 Q Early evening of January 21st?
2 A Yes.
3 Q The same day the story was reported?
4 A Yes.
5 Q Okay. So, from your point of view, this was
6 something that needed to be addressed?
7 MR. McDANIEL: Your Honor, I--Senator, I object to
8 the question about "this" is something that needs to be
9 addressed. I don't understand what the "this" is, exactly,
10 that the question refers to. Does it refer to the story?
11 Does it refer to the President's statement to Mr.
12 Blumenthal?
13 SENATOR SPECTER: Well, we think--Senator Edwards
14 and I concur that the witness can answer the question. If
15 he does not understand it, he can say so and then can have
16 the question rephrased.
17 BY MR. GRAHAM:
18 Q You have a conversation with the President on the
19 same day the article comes out, and the conversation
20 includes a discussion about the relationship between him and
21 Ms. Lewinsky. Is that correct?
22 A Yes.
23 Q Okay. So it was certainly on people's minds,
24 including the President, is that correct, the essence of
25 this story?

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1 MR. McDANIEL: I object to the question about
2 whether it's on people's minds. I think he can answer about
3 what he knew or about what he learned from people who spoke
4 to him, but the question goes far beyond that.
5 BY MR. GRAHAM:
6 Q Well, let me ask you this. We know it was on the
7 President's mind.
8 SENATOR SPECTER: Senator Edwards and I think
9 that, technically, that's correct, and perhaps you can avoid
10 it by just pinpointing it just a little more.
11 MR. GRAHAM: Yes. We'll try to be laser-like in
12 these questions.
13 BY MR. GRAHAM:
14 Q You had a conversation with the President of the
15 United States about his relationship with Ms. Lewinsky on
16 the same day The Washington Post article came out. That's
17 correct? Yes or no?
18 A That--I--I--that's right.
19 Q Okay. During that period of time, that day or any
20 day thereafter, were you involved in any meeting with White
21 House lawyers or press people where the conversation--or
22 where the topic of Ms. Lewinsky's allegations or the--Ken
23 Starr's allegations about Ms. Lewinsky came up?
24 A I'm confused about which allegations you're
25 talking about.

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1 Q That she had a relationship with the President,
2 and they were trying to get her to file a false affidavit.
3 Did that topic ever come up in your presence with the Press
4 Secretary, White House press people or lawyers for the White
5 House?
6 A I think the whole story was discussed by senior
7 staff in the White House.
8 Q When did that begin to occur?
9 A I'm sure we were discussing it on January 21st.
10 Q Do you recall that every--
11 A Every--everyone in the country was talking about
12 it.
13 Q Well, do you recall the tenor of that
14 conversation? Do you recall the flavor of it? Can you
15 describe it the best you can, about--was there a sense of
16 alarm, shock? How would you describe it?
17 A I think we felt overwhelmed by the crisis
18 atmosphere.
19 Q Did anybody ever suggest who is Monica Lewinsky,
20 go find out about who she is and what she does?
21 A No.
22 Q So is it your testimony that this accusation comes
23 out on January 21st, and the accusation being that a White
24 House intern has an inappropriate relationship with the
25 President, filed a false affidavit on his behalf, and nobody

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1 at this meeting suggested let's find out who Monica Lewinsky
2 is and what's going on here?
3 A Well, I wasn't referring to any meeting, but in
4 any of my discussions with members of the White House staff,
5 nobody discussed Monica Lewinsky's personal life or decided
6 that we had to find out who she was.
7 Q Could I turn you now to Tab 15, please? Okay.
8 MR. McDANIEL: Would you like him to read this?
9 MR. GRAHAM: Yes. Yes, please. Just take your
10 time. And I am now referring to an AP story by Karen
11 G-u-l-l-o. I don't want to mispronounce her name.
12 [Witness perusing document.]
13 THE WITNESS: I'm ready, Congressman.
14 BY MR. GRAHAM:
15 Q Thank you.
16 And this article--do you know this reporter, by
17 any chance?
18 A I do know this reporter, but I did not know this
19 reporter on January 30th.
20 Q All right. Do you subsequently know--
21 A Some months later, I met this reporter.
22 Q And the basic essence of my question, Mr.
23 Blumenthal, will be this report indicates some derogatory
24 information about Ms. Lewinsky, and it also has some
25 statements by White House Press Secretary and Ms. Lewis.

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1 And I want to ask how those two statements go together.
2 This report indicates that a White House aide
3 called this reporter to suggest that Ms. Lewinsky's past
4 included weight problems, and she was called "The Stalker."
5 And it says that "Junior staff members, speaking on
6 condition that they not be identified, said she was known as
7 a flirt, wore her skirts too short, was "'a little bit
8 weird'." And the next paragraph says: "Little by little,
9 ever since the allegations of an affair between President
10 Clinton and Ms. Lewinsky surfaced 10 days ago, White House
11 sources have waged a behind-the-scenes campaign to portray
12 her as an untrustworthy climber obsessed with the
13 President."
14 Do you have any direct knowledge or indirect
15 knowledge that such a campaign by White House aides or
16 junior staff members ever existed?
17 A No.
18 Q Okay. Do you ever remember hearing Ms. Lewis or
19 Mr. McCurry admonishing anyone in the White House about
20 "watch what you say about Ms. Lewinsky"?
21 A No. I don't recall those incidents described in
22 this article, but I do note that among senior advisors at
23 one of the meetings that we held--it could have been in the
24 morning or late afternoon--we felt very firmly that nobody
25 should ever be a source to a reporter about a story about

1 Monica Lewinsky's personal life, and I strongly agreed with
2 that and that's what we decided.
3 Q When did that meeting occur?
4 A I'd say within a week of the story breaking.
5 Q Who was at that meeting?
6 A I don't recall exactly, but I would say that the
7 list of names that I mentioned before.
8 Q And that would be?
9 A I may not get them all, but I would say Chuck
10 Ruff, Cheryl Mills, Bruce Lindsey, Lanny Breuer, Jim
11 Kennedy, Mike McCurry, Joe Lockhart, Adam Goldberg, Don
12 Goldberg, Ann Lewis, Paul Begala, Rahm Emanuel, myself.
13 Q And this occurred about a week after the January
14 21st article?
15 A I don't recall the exact date.
16 Q At least 7 days?
17 A Within a week--
18 Q Okay.
19 A --I believe.
20 Q Would it be fair to say that you were sitting
21 there during this conversation and that you had previously
22 been told by the President that he was in essence a victim
23 of Ms. Lewinsky's sexual demands, and you said nothing to
24 anyone?
25 MR. McDANIEL: Is the question, "You said"--

1 THE WITNESS: I don't--

2 MR. McDANIEL: Is the question, "You said nothing

3 to anyone about what the President told you?"?

4 MR. GRAHAM: Right.

5 THE WITNESS: I never told any of my colleagues

6 about what the President told me.

7 BY MR. GRAHAM:

8 Q And this is after the President recants his

9 story--recounts his story--to you, where he's visibly upset,

10 feels like he's a victim, that he associates himself with a

11 character who's being lied about, and you at no time

12 suggested to your colleagues that there is something going

13 on here with the President and Ms. Lewinsky you need to know

14 about. Is that your testimony?

15 A I never mentioned my conversation. I regarded

16 that conversation as a private conversation in confidence,

17 and I didn't mention it to my colleagues, I didn't mention

18 it to my friends, I didn't mention it to my family, bedsides

19 my wife.

20 Q Did you mention it to any White House lawyers?

21 A I mentioned it many months later to Lanny Breuer

22 in preparation for one of my grand jury appearances, when I

23 knew I would be questioned about it. And I certainly never

24 mentioned it to any reporter.

25 Q Do you know how, over a period of weeks, stories

1 about Ms. Lewinsky being called a stalker, a fantasizer,
2 obsessed with the President, called the name "Elvira"--do
3 you know how that got into the press?
4 A Which--which--which question are you asking me?
5 Which part of that?
6 Q Okay. Do you have any idea how White House
7 sources are associated with statements such as "She's known
8 as 'Elvira'," "She's obsessed with the President," "She's
9 known as a flirt," "She's the product of a troubled home,
10 divorced parents," "She's known as 'The Stalker'"? Do you
11 have any idea how that got in the press?
12 MR. BREUER: I'm going to object. The document
13 speaks for itself, but it's not clear that the terms that
14 Mr. Lindsey has used are necessarily--any or all of them--
15 are from a White House source. I object to the form and the
16 characterization of the question.
17 MR. GRAHAM: The ones that I have indicated are
18 associated with the White House as being the source of those
19 statements and--
20 SENATOR SPECTER: Senator Edwards and I think that
21 question is appropriate, and the objection is overruled.
22 THE WITNESS: I have no idea how anything came to
23 be attributed to a White House source.
24 BY MR. GRAHAM:
25 Q Do you know a Mr. Terry Lenzner?

1 A I--I met him once.
2 Q When did you meet him?
3 A I met him outside the grand jury room.
4 Q And who is he?
5 A He's a private investigator.
6 Q And who does he work for?
7 A He works for many clients, including the
8 President.
9 Q Okay. Mr. Blumenthal, I appreciate your candor
10 here.
11 Do you know Mr. Harry Evans?
12 A Harold Evans?
13 Q Yes, sir.
14 A Yes, I do.
15 Q Who is Mr. Harold Evans?
16 A Harold Evans is--I don't know his exact title
17 right now. He works for Mort Zuckerman, involving his
18 publications, and he's the husband of my former editor, Tina
19 Brown.
20 Q Has he ever worked for the New York Daily News?
21 MR. BREUER: I'm going to object to this line of
22 questioning. It seems well beyond the scope of this
23 deposition. I have never heard of Mr. Harold Evans, and
24 it's not clear to me that's anywhere in this voluminous
25 record or any of these issues.

1 SENATOR SPECTER: Senator Edwards and I think it
2 would be appropriate to have an offer of proof on this,
3 Congressman Graham.
4 MR. GRAHAM: I'm going to ask Mr. Blumenthal if he
5 has ever at any time passed on to Mr. Evans or anyone else
6 raw notes, notes, work products from a Mr. Terry Lenzner
7 about subjects of White House investigations to members of
8 the press, to include Ms. Lewinsky.
9 SENATOR SPECTER: Relating to Monica Lewinsky?
10 MR. GRAHAM: Yes, and anyone else.
11 MR. McDANIEL: That's a good question. I think we
12 don't have any objection to that question.
13 SENATOR SPECTER: Well, we still have to rule on
14 it. Overruled. The objection is overruled.
15 MR. GRAHAM: All right. Now I think I know the
16 answer.
17 [Laughter.]
18 BY MR. GRAHAM:
19 Q So let's phrase it very clearly for the record
20 here. You know Mr. Evans; correct?
21 A I do.
22 Q Have you at any time received any notes, work
23 product from a Mr. Terry Lenzner about anybody?
24 A No.
25 Q Okay. So, therefore, you had nothing to pass on?

1 A Right.
2 Q Fair enough. Do you know a Mr. Gene Lyons?
3 A Yes, I do.
4 Q Who is Mr. Gene Lyons?
5 A He is a columnist for the Arkansas Democrat
6 Gazette.
7 Q Are you familiar with his appearance on "Meet the
8 Press" where he suggests in an article he wrote later that
9 maybe the President is a victim similar to David Letterman
10 in terms of somebody following him around, obsessed with
11 him?
12 A Is this one of the exhibits?
13 Q Yes, sir.
14 A I wonder if you could refer me to it.
15 Q Sure. I can't read my writing.
16 [Pause.]
17 BY MR. GRAHAM:
18 Q Well, while we are looking for the exhibit, let me
19 ask you this. Do you have any independent knowledge of him
20 making such a statement?
21 A Well, I'd like to see the exhibit so--
22 Q Okay.
23 A --so I could know exactly what he said.
24 Q Okay.
25 MR. McDANIEL: If I might--Congressman, I don't

1 know whether the one you're thinking of is--I note in
2 Exhibit 20, there are--well, it's not a story by Mr. Lyons--
3 MR. GRAHAM: And that's it.
4 MR. McDANIEL: There are references to him in--in
5 that story.
6 MR. GRAHAM: That's it. Thank you very much.
7 MR. McDANIEL: You're welcome.
8 MR. GRAHAM: I appreciate it.
9 THE WITNESS: This is 20?
10 BY MR. GRAHAM:
11 Q Yes, sir.
12 A Thank you.
13 Do you mind if I just read through it?
14 Q Yes, sir. Take your time.
15 A Thank you. [Witness perusing document.] I've
16 read this.
17 Q My question is that this article is a Boston Globe
18 article, Saturday, February the 21st, and it references an
19 appearance on "Meet the Press" by Mr. Gene Lyons. And I
20 believe you know who Mr. Gene Lyons is; is that correct?
21 A I do.
22 Q Did you know who he was in January of 1998?
23 A I did.
24 Q And in this press appearance, it refers to it
25 being the Sunday before the Saturday, February 21st,

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1 sometime in the middle of February.

2 He indicates on the show, at least this article

3 recounts that he indicates, that the President could be in

4 fact in "'a totally innocent relationship in which the

5 President was, in a sense, the victim of someone, rather

6 like the woman who followed David Letterman around.'"

7 Do you know how Mr. Lyons would come to that

8 conclusion? I know word travels fast, but how would he know

9 that? Do you have any independent knowledge of how he would

10 know that?

11 A What exactly is the question?

12 Q Well, the question is Mr. Lyons is indicating in

13 the middle of February that the truth of the matter may very

14 well be that the President is in an "innocent relationship

15 in which the President was, in a sense, the victim of

16 someone, rather like the woman who followed David Letterman

17 around," and the question is that scenario of the President

18 being a victim of someone obsessed seems rather like the

19 conversation you had with the President on January the 21st.

20 Do you know how Mr. Lyons would have had that take on

21 things?

22 MR. McDANIEL: Well, I object to a question that

23 sort of loads up premises, Senators. That question sort of,

24 you know, says, well, this conversation is a lot like the

25 one you had with the President, and then asks the question.

1 And the danger to the witness is that he'll--by answering
2 the question accepts the premise.
3 And I ask that if you want to ask him whether it's
4 like the conversation with the President, that's a fair
5 question, he'll answer it, but it ought to be broken out of
6 there.
7 [Senators Specter and Edwards conferring.]
8 SENATOR SPECTER: Senator Edwards and I disagree
9 on the ruling, so we're going to take Senator Edwards and
10 ask you to rephrase the question since it--
11 [Laughter.]
12 MR. GRAHAM: Fair enough.
13 BY MR. GRAHAM:
14 Q The characterization embodied here indicates this
15 could be a totally innocent relationship in which the
16 President was in a sense the victim of someone. Is it fair
17 to say, Mr. Blumenthal, that is very much like the scenario
18 the President painted to you when you talked with him on
19 January the 21st?
20 A It could be like that.
21 Q Okay. And it goes on further: "rather like the
22 woman who followed David Letterman around." Is that very
23 much like the characterization the President indicated to
24 you between him and Ms. Lewinsky?
25 A Could be.

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1 Q Did you ever at any time talk with Mr. Gene Lyons
2 about Ms. Lewinsky or any other person that was the subject
3 of a relationship with the President?
4 A I did talk to Gene Lyons about Monica Lewinsky.
5 Q Could you tell us what you told him?
6 A He asked me my views, and I told him, in no
7 uncertain terms, that I wouldn't talk about her personally.
8 I talked about Monica Lewinsky with all sorts of people, my
9 mother, my friends, about what was in the news stories every
10 day, just like everyone else, but when it came to talking
11 about her personally, I drew a line.
12 Q So, when you talk to your mother and your friends
13 and Mr. Lyons about Ms. Lewinsky, are you telling us that
14 you have these conversations, and you know what the
15 President has told you and you're not tempted to tell
16 somebody the President is a victim of this lady, out of his
17 own mouth?
18 A Not only am I not tempted, I did not.
19 Q You don't know how all this information came out?
20 You have no knowledge of it at all?
21 MR. McDANIEL: I don't understand the question
22 about--
23 MR. GRAHAM: About her being a stalker, her being
24 obsessed with the President, the President being like David
25 Letterman in relationship to her.

1 BY MR. GRAHAM:

2 Q You had no knowledge of how that all happened in

3 the press?

4 A I have an idea how it started in the press.

5 Q Well, please share that with us.

6 A I believe it started on January 21st with the

7 publication of an article in Newsweek by Michael Isikoff

8 that was posted on the World Wide Web and faxed around to

9 everyone in the news media, in Washington, New York,

10 everywhere, and in the White House. And in that article,

11 Michael Isikoff reported the contents of what became known

12 as the talking points.

13 And there was a mystery at the time about who

14 wrote the talking points. We know subsequently that Monica

15 Lewinsky wrote the talking points. And in that document,

16 the author of the talking points advises Linda Tripp that

17 she might refer to someone who was stalking the "P", meaning

18 the President, and after that story appeared, I believe

19 there were a flood of stories and discussions about this,

20 starting on "Nightline" that very night and "Nightline" the

21 next night and so on. And that's my understanding from

22 observing the media of how this started.

23 Q How long have you been involved in the media

24 yourself?

25 A Before I joined the White House staff, I was a

1 journalist for 27 years.

2 Q Is it your testimony that the Isikoff article on

3 the 21st explains how White House sources contact reporters

4 in late January and mid-February trying to explain that the

5 President is a victim of a stalker, an obsessed young lady,

6 who is the product of a broken home? Is that your

7 testimony?

8 A No.

9 MR. BREUER: I'm going to object to the form of

10 the question. There is no evidence that White House

11 officials, both in January and in February, if at any time,

12 contacted sources, press sources.

13 MR. GRAHAM: I will introduce these articles. The

14 articles are dated with White House sources, unsolicited,

15 calling about this event, saying these things in January and

16 February.

17 MR. BREUER: Well--

18 SENATOR SPECTER: Senator Edwards and I agree that

19 the question may be asked and answered. Overruled.

20 THE WITNESS: If you could restate it, please?

21 BY MR. GRAHAM:

22 Q Is it your testimony that the White House sources

23 that are being referred to by the press are a result of the

24 21st of January Isikoff article? That's not what you're

25 saying, is it?

1 A No.

2 MR. McDANIEL: Well--

3 MR. GRAHAM: Thank you.

4 MR. McDANIEL: --I don't think that there ought to
5 be argument with Mr. Blumenthal. I think he ought to be
6 asked a question and given an opportunity to answer it, and
7 that's an argumentative question and followed up by, "That's
8 not what you're saying, is it?"

9 I also think the questions are remarkably
10 imprecise, in that they do not specify what information it
11 is this questioner is seeking to get Mr. Blumenthal to talk
12 about, and in that regard, I think the questions are both
13 irrelevant and unfair.

14 SENATOR EDWARDS: Are you objecting to a question
15 that's already been asked and answered?

16 MR. McDANIEL: I might be, Senator, and I had that
17 feeling when I heard Mr. Blumenthal say something, that I
18 might be doing that.

19 MR. GRAHAM: That would be my reply. He
20 understood what I asked, and he answered, and I'll accept
21 his answer and we'll move on.

22 SENATOR SPECTER: Well, I think the objection is
23 mooted at this point.

24 MR. GRAHAM: Okay.

25 SENATOR SPECTER: I do--I do think that to the

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1 extent you can be more precise, because these articles do
2 contain--
3 MR. GRAHAM: Yes, sir.
4 SENATOR SPECTER: --a lot of information. We're
5 still looking for that laser.
6 MR. GRAHAM: Yes, sir.
7 BY MR. GRAHAM:
8 Q And these--and the reason this comes up, Mr.
9 Isikoff--excuse me--Mr. Blumenthal, is you've referenced the
10 Isikoff article on the 21st, and my question goes to White
11 House sources indicating that Ms. Lewinsky is a stalker, the
12 January 30th article, that she's obsessed with the
13 President, that she wears tight skirts.
14 What I'm trying to say is that you--you are not
15 saying--it is not your testimony--that those White House
16 sources are picking up on the 21st article, are you?
17 A I don't know about any White House sources on
18 these stories.
19 Q When you talked to Mr. Lyons, you never mentioned
20 what time at all that Ms. Lewinsky was making demands on the
21 President and he had to rebuff her?
22 A Absolutely not.
23 Q You never at one time told Mr. Lyons or anyone
24 else that the President felt like that he was a victim much
25 like the person in the novel, Darkness at Noon?

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1 MR. McDANIEL: Well, I object to that question.
2 This witness has testified that he told his wife and that he
3 told White House counsel at a later date, and the question
4 included anyone else. So I think it--
5 MR. GRAHAM: Yes. Strike that.
6 BY MR. GRAHAM:
7 Q Excluding those two people?
8 A Well, I believe I've asked--I've been asked, and
9 answered that, and I haven't told anyone else.
10 Q Was there--
11 A I didn't tell anyone else.
12 Q Was there ever an investigation at the White House
13 about how these stories came out, supposedly?
14 A No.
15 Q Was anybody ever fired?
16 A No.
17 MR. GRAHAM: Thank you, Mr. Blumenthal.
18 THE WITNESS: I thank you.
19 MR. ROGAN: No further questions.
20 MR. BREUER: Could we take a 5-minute break,
21 Senator?
22 SENATOR SPECTER: We can. We will recess for 5
23 minutes.
24 THE VIDEOGRAPHER: We are going off the record at
25 11:24 a.m.

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1 [Recess.]

2 THE VIDEOGRAPHER: We're going on the record at

3 11:40 a.m.

4 SENATOR SPECTER: Turn to White House counsel, Mr.

5 Lanny Breuer.

6 MR. BREUER: Senators, the White House has no

7 questions for Mr. Blumenthal.

8 SENATOR SPECTER: We had deferred one line of

9 questions which had been subject objection and considerable

10 conference, and we put it at the end of the transcript so it

11 could be excised. Do you wish to--

12 MR. GRAHAM: Yes.

13 SENATOR SPECTER: --proceed further?

14 MR. BREUER: May we approach off the record,

15 Senators?

16 SENATOR SPECTER: Off the record.

17 THE VIDEOGRAPHER: We're going off the record at

18 11:41 a.m.

19 [Discussion off the record.]

20 THE VIDEOGRAPHER: We are going back on the record

21 at 12:10 p.m.

22 SENATOR SPECTER: The Senators have considered the

23 matter, and in light of the references, albeit abbreviated,

24 in the record and the generalization that answers--questions

25 and answers would be permitted, reserving the final judgment

1 to the full Senate, we will permit Congressman Graham to
2 question on pattern and practice with respect to Ms. Willey.
3 MR. GRAHAM: Okay. Thank you.
4 FURTHER EXAMINATION BY HOUSE MANAGERS
5 BY MR. GRAHAM:
6 Q Mr. Blumenthal, we're really close to the end
7 here. If you could turn to Tab 5, page 193.
8 A We have it.
9 Q Okay, thank you.
10 And page 20, the last question, it's in the
11 right-hand corner. I'll read the question, and we'll kind
12 of follow the testimony. "Have you ever had a discussion
13 with people in the White House or been present during any
14 meeting where the allegation has come up that other women
15 are fabricating an affair with the President?"
16 Now, could you read the answer for me, please?
17 A Sure. My--my answer in the grand jury is this:
18 "We've discussed news stories that arose out of the Jones
19 case, which was dismissed by the judge as having no basis,
20 in which there were allegations made against the President,
21 and these were stories that were in the press."
22 Q "And you"--"And did you discuss those with the
23 President?"
24 You said, "No."
25 And the next question is: "So what form did you

1 discuss those news stories in?"

2 And your answer was?

3 A "In strategy meetings."

4 Q Okay. "And that would include the daily meetings,

5 the morning and the evening meetings?"

6 A Yes.

7 Q And your answer was "Yes."

8 Now, within that context, I want to walk through a

9 bit how those strategy meetings came about and the purpose

10 of the strategy meetings.

11 The next question goes as follows: "And there

12 were names of the women that you discussed in that context

13 that there had been news stories about and public

14 allegations of an affair with the President?"

15 And your answer was?

16 A "As I recall, we discussed Paula Jones, Kathleen

17 Willey, we've discussed"--and the rest is redacted.

18 Q Redacted--and that's fine, that's fine.

19 And the question later on, on line 24: "When you

20 say that that was a complete and utter fraudulent

21 allegation--", the answer is: "In my view, yes." Right?

22 A Well--

23 Q About a woman?

24 MR. McDANIEL: Senator, I must object to this,

25 because I believe that question, clearly from the context,

1 refers to redacted material--
2 MR. GRAHAM: Right.
3 MR. McDANIEL: --which has been preserved as
4 secret by the grand jury, and I think it's somewhat
5 misleading to talk about a fraudulent allegation that the
6 grand jury heard that Mr. Blumenthal testified about, which
7 is clearly not in the record before the Senate.
8 SENATOR SPECTER: Well, it is unclear on the face
9 of the record. So, Congressman Graham, if you could--
10 MR. GRAHAM: The point I'm trying--
11 SENATOR SPECTER: --excuse me, let me just finish-
12
13 MR. GRAHAM: Yes.
14 SENATOR SPECTER: --if you could specify on what
15 is on the record that you've put in up to now.
16 MR. GRAHAM: Okay. What I'm reading from,
17 Senator, is--is a question and answer and a redacted name,
18 and the point I'm trying to make is ever who that person
19 was, the allegation was considered to be fraudulent based on
20 your prior testimony.
21 THE WITNESS: That was--that was my testimony,
22 that it was my view.
23 BY MR. GRAHAM:
24 Q And that leads to this question. Was there ever a
25 discussion in these strategy meetings where there was an

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1 admission that the allegation was believed to be true
2 against the President in terms of relationship with other
3 women?
4 MR. BREUER: I'm going to object to the form of
5 the question in that it's referring to other women. Even
6 based on the discussion that went off the record, I think
7 that what Mr. Graham is doing now is certainly beyond any
8 record in this case.
9 SENATOR SPECTER: Senator Edwards would like to
10 hear the question repeated.
11 MR. GRAHAM: The strategy meetings--
12 SENATOR SPECTER: Good idea?
13 MR. GRAHAM: Yes, sir.
14 BY MR. GRAHAM:
15 Q The strategy meetings involved press accounts of
16 allegations between the President and other women. The
17 question is very simple. At any of those meetings, was it
18 ever conceded that the President did have in fact a
19 relationship?
20 MR. BREUER: Object. I object to the question for
21 the reasons I just previously stated.
22 SENATOR SPECTER: Senator Edwards raises the
23 concern that I think he's correct on, that we have limited
24 it to Willey, Ms. Willey. So, if you would--if you would
25 focus--

1 MR. GRAHAM: Absolutely.
2 SENATOR SPECTER: --there--
3 MR. GRAHAM: Absolutely.
4 SENATOR SPECTER: --it would be within your
5 proffer and what we have permitted.
6 MR. GRAHAM: Yes, sir. Very well.
7 BY MR. GRAHAM:
8 Q In regards to Ms. Willey, is it fair to say that
9 the consensus of the group was that these allegations were
10 not true?
11 A I don't know.
12 Q Do you recall Ms. Willey giving a "60 Minutes"
13 interview?
14 A Yes.
15 Q Do you recall any discussions after the interview
16 at a strategy meeting about Ms. Willey?
17 MR. BREUER: I want the record to be clear that
18 the White House has a continuing objection as to this line
19 of inquiry.
20 SENATOR SPECTER: The record will so note.
21 THE WITNESS: If you could repeat the question,
22 please.
23 MR. GRAHAM: Yes.
24 THE WITNESS: Sorry.
25 BY MR. GRAHAM:

1 Q After the "60 Minutes" interview, was there ever a
2 strategy meeting about what she said?
3 A At one of the morning or evening meetings, we
4 discussed the "60 Minutes" interview.
5 Q And can you--I--I know it's hard because these
6 meetings go on a lot. How--do you know who was there on
7 that occasion, who would be the players that would be there?
8 A They would be the same as before. I'd be happy to
9 enumerate them for you, if you want me to.
10 Q But the same as you previously testified to?
11 A Yes.
12 Q Okay, that's fine.
13 Do you recall what the discussions were about in
14 terms of how to respond to the "60 Minutes" story?
15 A Yes.
16 Q Could you tell us?
17 A They were what our official spokes-people would
18 say.
19 Q Did they include anything else?
20 A Yes.
21 Q Could you please tell us?
22 A There was a considerable complaining about how, in
23 the "60 Minutes" broadcast, Bob Bennett was not given
24 adequate time to speak and present his case, and how he was,
25 as I recall, poorly lighted.

1 Q Was there any discussion about what Ms. Willey
2 said herself and how that should be responded to?
3 A I don't recall exactly. We just spoke about what
4 our official spokespeople should respond to.
5 Q Did anybody ever discuss the fact that Ms. Willey
6 may have had a checkered past?
7 A No, absolutely not. We never discussed the
8 personal lives of any woman in those meetings.
9 Q Did it ever come up as to, well, here's what we
10 know about Kathleen Willey and the President, or let's go
11 see what we can find out about Kathleen Willey and the
12 President?
13 A No.
14 Q Who had the letters that Kathleen Willey wrote to
15 the President?
16 A I don't know exactly. The White House had them.
17 Q Isn't it fair to say that somebody found those
18 letters, kept those letters, and was ready to respond with
19 those letters, if needed to be?
20 MR. BREUER: I'm going to object to the form of
21 the question that it's outside the proffer of the Manager.
22 [Senators Specter and Edwards conferring.]
23 MR. McDANIEL: Yes. I object to the compound
24 nature of the question, and--
25 SENATOR SPECTER: Could you rephrase the question,

1 Congressman Lindsey--

2 MR. GRAHAM: Yes, sir.

3 SENATOR SPECTER: --or, Graham?

4 MR. GRAHAM: Yes, sir.

5 SENATOR SPECTER: I think that would solve your

6 problem.

7 BY MR. GRAHAM:

8 Q There were letters written to Ms. Willey to the

9 President that were released to the media. Is that correct?

10 A Yes.

11 Q Do you know who gathered those letters up and how

12 they were gathered up?

13 MR. BREUER: Objection.

14 SENATOR SPECTER: Senator Edwards and I agree that

15 the Congressman may ask the question. Overruled.

16 THE WITNESS: No.

17 BY MR. GRAHAM:

18 Q Would it be fair to say, using common sense, that

19 somebody was planning to answer Ms. Willey by having those

20 letters to offer to the press?

21 MR. BREUER: Objection.

22 MR. McDANIEL: It's argumentative.

23 MR. BREUER: It certainly is.

24 SENATOR SPECTER: Would you repeat that question?

25 BY MR. GRAHAM:

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1 Q The question is: Mr. Blumenthal, do you believe
2 it's a fair assumption to make that somebody in the White
3 House made a conscious effort to go seek out the letters
4 between the President and Ms. Willey and use in response to
5 her allegations?
6 [Senators Specter and Edwards conferring.]
7 THE WITNESS: Well, that's an opin--
8 MS. MARSH: Wait, wait, wait.
9 MR. McDANIEL: Please, Mr. Blumenthal.
10 THE WITNESS: Yes.
11 SENATOR SPECTER: Senator Edwards says, and I
12 agree with him, that you ought to direct it to somebody with
13 specific knowledge so you don't--
14 BY MR. GRAHAM:
15 Q Do you have any knowledge--
16 SENATOR SPECTER: --deal totally with speculation.
17 BY MR. GRAHAM:
18 Q Do you have any specific knowledge of that event
19 occurring, somebody gathering the letters up, having them
20 ready to be able to respond to Ms. Willey if she ever said
21 anything?
22 A No.
23 Q You have no knowledge whatsoever of how those
24 letters came into the possession of the White House to be
25 released to the press?

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1 A No, I don't. I don't know--

2 MR. GRAHAM: Thank you. I--

3 THE WITNESS: --who had them--

4 MR. GRAHAM: --don't have any--

5 THE WITNESS: --in the White House.

6 MR. GRAHAM: --further questions.

7 SENATOR SPECTER: White House counsel, Mr. Breuer?

8 MR. BREUER: Senators, the only thing I would do

9 at this point is introduce just for--to keep the record as

10 complete as we can, given Mr. Graham's two references to

11 articles introduced, a White House exhibit that contains the

12 January 21, 1998, Isikoff story in Newsweek; the January 21,

13 1998, ABC "Nightline" transcript; the January 22, 1998, ABC

14 "Nightline" news transcript; the January 29, 1998,

15 Washington Post article; the February 2, 1998, Washington

16 Times article; the July 29, 1998, Washington Times article;

17 and the August 8, 1998, L.A. Times article, just to have a

18 complete record with respect to news stories.

19 The Managers have seen these articles previously,

20 Senators.

21 SENATOR SPECTER: Any objection?

22 MR. GRAHAM: Not at all, and let's just make sure

23 that the articles I have referenced are into the record--Tab

24 15, the Associated Press article of January--

25 SENATOR SPECTER: We'll rule first on the offer by

1 the White House counsel. Without objection, they will be
2 admitted to the record.
3 [White House Exhibit Nos. S.B.
4 1 through S.B. 7 marked and
5 received in evidence.]
6 SENATOR SPECTER: Any objection to Congressman
7 Graham's offer, Mr. Breuer?
8 MR. BREUER: No. With respect to Tab 15, none at
9 all.
10 MR. GRAHAM: Tab 20?
11 MR. BREUER: No. That--no objection.
12 SENATOR SPECTER: Tabs 15 and 20 will be admitted.
13 [Tab Nos. 15 and 20 received
14 in evidence.]
15 MR. GRAHAM: Tab 11?
16 MR. BREUER: We object to Tab 11. There is
17 no--there's been no questions about Tab 11.
18 SENATOR SPECTER: Are you pressing Tab 11--in
19 which event, we'll take a look at it.
20 MR. GRAHAM: Well, I would--I haven't asked any
21 questions about theirs, so I'm just trying to have a balance
22 here. Yes, Tab 11, I would like to be entered into the
23 record.
24 SENATOR SPECTER: Well, we'll take a look at it
25 and make a ruling.

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1 MR. GRAHAM: Okay. And in that regard, Tab 10.
2 [Senators Specter and Edwards conferring.]
3 MR. GRAHAM: I'll tell you what--why don't we make
4 this easy. I understand what you're saying. Let's
5 substitute 9 for 10.
6 SENATOR SPECTER: Well, you were on 11, weren't
7 you?
8 MR. GRAHAM: Well, yes, sir. I'm pressing 11, and
9 I'll--I'll take 9 for 10.
10 SENATOR SPECTER: Well, we've already admitted 10.
11 [Tab No. 10 received in
12 evidence.]
13 SENATOR SPECTER: Do you have an objection, Mr.
14 Breuer, to 9?
15 MR. BREUER: In principle, Senator, it's my view
16 that Mr. Graham has now been given ample opportunity to ask
17 questions. Whatever articles he questioned Mr. Blumenthal
18 about, I think should be in the record, and all the rest of
19 the articles that he chose not to question Mr. Blumenthal
20 about, I believe should not be in the record. That is
21 really my principal position, and I think, candidly,
22 Senators, it's a very fair one.
23 [Senators Specter and Edwards conferring.]
24 MR. GRAHAM: Yes, that's my--I'm assuming they
25 are, John. That's why I didn't make a big deal about going

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1 through each one of them--and if that's my mistake, I'm
2 sorry, but I assumed that the whole time.
3 MR. GRIFFITH: Are they part of the Senate record?
4 MR. GRAHAM: I don't want to make a statement
5 about that and just make it up. I don't know.
6 SENATOR SPECTER: Well, I think this is less than
7 much ado about nothing, but, Congressman Graham, why do you
8 think they are important to your case, and then we will hear
9 from Mr. Breuer about why he is objecting to them.
10 MR. GRAHAM: I think these articles go along the
11 line of questioning about the events concerning--
12 SENATOR SPECTER: So that you've spared us the
13 travail of having questions?
14 MR. GRAHAM: In all honesty, Senator, I want to
15 get this thing over as much as you all do, and I could go
16 through every article if I need to, but it is a continuation
17 of the questioning that I inquired of the witness, and I
18 think it reflects--
19 SENATOR SPECTER: And, Mr. Breuer, are you
20 contending--
21 MR. GRAHAM: --that record.
22 SENATOR SPECTER: --that the admission of these
23 couple of newspaper stories would be prejudicial to your
24 client?
25 MR. BREUER: No, I don't think they'd be

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1 prejudicial at all, Senator. I simply believe--and I will
2 defer to the ruling of the Senators--I simply believe that
3 if Mr. Graham didn't inquire about them, they ought not to
4 be in the record. And indeed, I questioned, without going
5 off the record--I indeed tried to find out the evidentiary
6 rules of this proceeding prior to this coming, before us
7 doing this here, and that was my understanding, that if Mr.
8 Graham did indeed did not question about an article or seek
9 to introduce it in his case, it wouldn't be introduced.
10 SENATOR SPECTER: Mr. Breuer, didn't you offer and
11 we admitted into evidence many stories which had not been
12 the subject of questions?
13 MR. BREUER: I did, but I did that--I began to do
14 that in my case, in my--I wanted to do that in my
15 presentation, but, Senator, I will defer. I don't think
16 that these articles hurt the President at all, and if for
17 purposes of a complete record, the Senator--
18 SENATOR SPECTER: Well, that's a generous
19 conciliatory statement, and my instinct would be to put them
20 in, since they have so little weight one way or another.
21 MR. BREUER: Okay.
22 SENATOR EDWARDS: I agree.
23 MR. BREUER: Before--
24 SENATOR SPECTER: Senator Edwards and I agree they
25 should be admitted into evidence.

1 [Tab No. 9 received in
2 evidence.]
3 MR. BREUER: More importantly, though, may we take
4 another 5-minute break before the White House decides
5 whether it--
6 SENATOR SPECTER: Yes, you may. We'll take
7 another 5-minute break.
8 THE VIDEOGRAPHER: This marks the end of Videotape
9 Number 1 in the deposition of Sidney Blumenthal. We're
10 going off the record at 12:28 p.m.
11 [Recess.]
12 THE VIDEOGRAPHER: We're continuing with Videotape
13 Number 1 in the deposition of Sidney Blumenthal. The time
14 is 12:34 p.m.
15 SENATOR SPECTER: Mr. Breuer, you may proceed.
16 MR. BREUER: Senator--Senators, the White House
17 has no questions for Mr. Blumenthal.
18 Thank you, Mr. Blumenthal.
19 THE WITNESS: Thank you.
20 SENATOR SPECTER: Well, I believe that concludes
21 the proceeding. Thank you very much, Mr. Blumenthal, for
22 being here to testify. I thank counsel for Mr. Blumenthal.
23 MR. McDANIEL: Thank you, Senator.
24 THE WITNESS: Thank you, Senator. Thank you.
25 SENATOR SPECTER: Thank counsel, all.

1 And that concludes our proceeding.

2 THE VIDEOGRAPHER: This concludes the deposition

3 of Sidney Blumenthal.

4 We're going off the record at 12:35 p.m. The

5 number of tapes used is one.

6 [Whereupon, at 12:35 p.m., the deposition was

7 concluded.]

8 - - -

CERTIFICATE

I, **THOMAS C. BITSKO,** the Official Court Reporter for Miller Reporting Company, Inc., hereby certify that I recorded the foregoing proceedings; that the proceedings have been reduced to typewriting by me, or under my direction and that the foregoing transcript is a correct and accurate record of the proceedings to the best of my knowledge, ability and belief.

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Monday, January 26, 1998

NEWS

Painting a portrait of Monica Lewinsky CLINTON SEX SCANDAL As ex-intern ventures out of hiding, report offers more details on past
EXAMINER NEWS SERVICES

WASHINGTON - Former White House intern Monica Lewinsky, the woman at the center of the Washington sex scandal, left her family apartment in the Watergate complex Monday and drove off in a black car with her lawyer, William Ginsburg, witnesses said.

Lewinsky, 24, had not been seen in public since the media reported allegations that she had an affair with President Clinton and that he persuaded her to deny the affair under oath. Clinton has denied the allegations.

She is thought to have spent most of last week in the apartment, which belongs to her mother, Marcia Lewis.

Time magazine said this week that Lewinsky had nicknames when she worked in the White House. One of them was "the Stalker," because of her rushes toward the presidential helicopter whenever it landed.

The woman who later referred to herself on tape as "special assistant to the president for b- - j- -," was also nicknamed "Elvira" after the TV character noted for long black hair and chest-hugging dresses, Time reported.

In a profile of the 24-year-old former White House intern, Time reported that she "was attentive verging on ingratiating" in carrying out her duties, bringing

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coffee to staff members who had not asked for it, for example.

When she moved to the Pentagon to work as a personal assistant to spokesman Kenneth Bacon, she rarely talked politics, preferring to chat about her father's wealth, Time reported.

"She came off as flighty and flirty, "a rich Beverly Hills teen and all the insouciance that suggests,"' Time quoted a co-worker as saying.

At Beverly Hills High School, Lewinsky often visited at the home of classmate Eden Sassoon, daughter of the celebrity hair stylist, the magazine reported.

"She was sort of a hanger-on. She was very outgoing, sweet, charming. If you needed anything, she'd always help," Sassoon told Time. "Growing up in Beverly Hills, well, you know it's different, and perhaps being overweight, she'd overcompensate to please."

During her junior year, Lewinsky transferred to Bel Air High, a tiny private prep school where she became valedictorian in a class of seven.

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PHOTO; Caption: Lewinsky

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The Atlanta Constitution
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Tuesday, January 27, 1998

NATIONAL NEWS

WHITE HOUSE IN CRISIS Complex image of Lewinsky emerges To some she was dedicated and efficient, but others paint a more unflattering picture.
FROM OUR NEWS SERVICES

Metro

Washington ---Sharply contrasting portraits of Monica Lewinsky are emerging from the White House and the Pentagon.

Anonymous officials at the White House are portraying the woman at the center of the presidential sex scandal as star-struck and flirtatious. At the Pentagon, a step removed from the center of the political storm, former colleagues describe Lewinsky as hard-working and self-confident.

Even at the Pentagon, though, colleagues recall that whenever President Clinton appeared on television, Lewinsky stopped what she was doing and watched.

A part of the White House strategy is to raise questions about the veracity of the woman who is heard telling a friend on a secretly recorded tape that she had sexual relations with the president. The issue of whether these encounters were real or fantasy, and whether Clinton or his close friend Vernon Jordan pressured Lewinsky to deny an affair in a sworn deposition, lies at the center of controversy.

Last week when the scandal first broke, according to The Associated Press, one White House official who did not work for the administration at the time Lewinsky served as a White House intern began a whispering campaign that Lewinsky was "unstable," the product of a broken home.

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She battled a chronic weight problem, said the official, whom the AP did not name, and was known in the West Wing as "the stalker" for the way she shadowed Clinton as he went about his daily business.

News media have been fed other nicknames: "Elvira," for Lewinsky's long black hair and tight-fitting outfits; "Clutch," because when a famous person would shake her hand, she would not let go. Fellow interns rolled their eyes in disbelief when recalling how Lewinsky would announce that Clinton frequently called her or declared that the flowers on her desk were from him.

The story at the White House is that officials pushed to have Lewinsky transferred because of her infatuation with Clinton and puppy-like behavior around him. Former White House staffer Evelyn Lieberman, however, said in a statement over the weekend that "Lewinsky was not transferred because of a physical incident" with Clinton. Reports to the contrary, she said, "could not be further from the truth."

Officials at the Pentagon have been largely complimentary ---and far more restrained ---in their discussion of Lewinsky. One former associate was openly fuming at the flood of media inquiries seeking information on the 24-year-old.

"I will say she was a good worker. But I won't feed that color monster," the AP quoted the former associate as saying.

The theme of Lewinsky as hard worker comes up again and again in comments from defense officials.

"I was often amazed at the long hours she would put in for the money she was making," said Army Col. Richard Bridges, who works closely with Pentagon spokesman Kenneth Bacon. "She was very dedicated. She worked very hard."

After starting at the White House in June 1995 as an unpaid intern, Lewinsky moved to a paid White House position handling mail, then went to the Pentagon in April 1996 at an annual salary of $30,658. She was making $32,736 by last December, when she left.

Bacon described Lewinsky as competent and energetic in her job, and said, "Nothing in my observation of Monica or knowledge about her

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would give me any evidence that these allegations are correct."

Still, it was during an overseas trip with Defense Secretary William Cohen that Lewinsky startled reporters during a casual conversation last summer by mentioning that she had given Clinton the tie he wore in delivering the State of the Union address. The New York Post reported that Clinton contributor Walter Kaye disputed Lewinsky's claim, saying he had removed a tie he was wearing and handed it to Clinton after the president admired it. Kaye said Clinton wore that tie in delivering the speech.

One close colleague of Lewinsky's at the Pentagon said she showed no sign of nerves.

"She was a young person who was not intimidated by senior people," the AP quoted this official as saying. "When Ken Bacon wanted something, she could walk up to people, senior people, and ask for it."

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The Associated Press
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Friday, January 30, 1998

Whispering White House tried to discredit Lewinsky
KAREN GULLO

WASHINGTON (AP) - One White House aide called reporters to offer information about Monica Lewinsky's past, her weight problems and what the aide said was her nickname - "The Stalker."

Junior staff members, speaking on the condition that they not be identified, said she was known as a flirt, wore her skirts too short, was "a little bit weird."

Little by little, ever since allegations of an affair between President Clinton and Ms. Lewinsky surfaced ten days ago, White House sources have waged a behind-the-scenes campaign to portray her as an untrustworthy climber obsessed with the president.

"The president's defenders have been more than willing to supply negative information about her. It's been the president's ammo," said Larry Sabato, a political science professor at the University of Virginia.

White House officials deny that anyone has said Ms. Lewinsky was unstable.

"I can't imagine anyone in a responsible position at the White House would be making any such assertion," said Mike McCurry, presidential spokesman.

Yet, in subtle ways, a portrait of a flirty and irresponsible young woman has emerged from administration sources who offered the information on the condition that they not be publicly named.

Just hours after the story broke, one White House source made unsolicited calls offering that Ms. Lewinsky was the "troubled"

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product of divorced parents and may have been following the footsteps of her mother, who wrote a tell-all book about the private lives of three famous opera singers. The source said the mother claimed in the book to have had an affair with Placido Domingo.

A publicity sheet for the book said that Marcia Lewis, Ms. Lewinsky's mother, denied a rumor about such a relationship but urged readers to read the book and draw their own conclusions.

Such calls reflected "either a lack of coordination or thought or adult judgment," said White House communications director Ann Lewis. "We are not going down that road. It is not the issue. A discussion of other people is not appropriate."

She said she has been adamant in telling others in the White House not to discredit Ms. Lewinsky. When she overheard an official, whom she wouldn't name, circulating such talk, she said she told that person, "We will not do that."

Still, gossip and secondhand stories were being passed along well into the controversy's second week.

One story had Ms. Lewinsky following former Clinton aide George Stephanopoulos to Starbucks. After observing what kind of coffee he ordered, she showed up the next day at his secretary's desk with a cup of the same coffee to "surprise him."

The White House has said little publicly about Ms. Lewinsky. It did, however, provide an explanation about why she was transferred to a job at the Pentagon. In response to questions from reporters, the White House said that Evelyn Lieberman, then the deputy chief of staff, arranged the transfer because of "inappropriate and immature behavior."

Beyond that, the White House has avoided the subject.

"The White House is smart, any characterization could be misread," said Kathleen Hall Jamieson, dean of the Annenberg School for Communication at the University of Pennsylvania.

Clinton has been popular with women voters and any attempt to discredit Ms. Lewinsky could produce a backlash from women's' groups, said Jamieson.

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Another reason to keep quiet is a fear that criticizing Ms. Lewinsky would encourage her to cooperate with Whitewater prosecutor Kenneth Starr.

Instead, the administration has lashed out at conservative foes of the president. Hillary Rodham Clinton said in a nationally televised interview that a "vast right-wing conspiracy" was out to get the president, and that Starr "is allied with the right-wing opponents of my husband."

No sooner had Mrs. Clinton made her remarks than White House and Democratic sources hit the phones and sent faxes offering information about the conservative connections of Linda Tripp, whose tapes of conversations with Ms. Lewinsky set the controversy in motion, of Mrs. Tripp's lawyer and of a literary agent to Mrs. Tripp.

That sort of effort was not forbidden, said Lewis, the White House communications director.

"I have to draw the line between that and the characterization of individuals," she said. "What we are facing here is political opposition by people with definite ideologies."

---- INDEX REFERENCES ----

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Saturday, February 21, 1998

Op-Ed Page

CLINTON'S THE VICTIM OF LEWINSKY? NOW, THAT'S A STRETCH
Michael Kelly
MICHAEL KELLY Michael Kelly is a syndicated columnist.

WASHINGTON

Much in the discussion of whatever transpired between Monica Lewinsky and Bill Clinton has been repulsive, but the performance of the president's defenders on "Meet the Press" last Sunday was a benchmark.

The height of the performance came when Tim Russert asked Arkansas columnist and Clinton apologist Gene Lyons this question: "Do you believe that the amount of circumstantial evidence that has been produced thus far -- 37 visits from Monica Lewinsky to the White House after she left, gifts being sent in, recordings on her home answering machine from the president, job offers at the United Nations, a job at the Pentagon, Revlon company, at American Express -- does that create, in your mind, some concern that there may have been an inappropriate relationship between the president and Monica Lewinsky?"

Lyons admitted that no one would believe hin if he claimed the evidence did not raise such a concern. With that wisp of a demurral out of the way, he went on to posit an alternative reading of the evidence: "a totally innocent relationship in which the president was, in a sense, the victim of someone, rather like the woman who followed David Letterman around."

He added: "There's no evidence that I've seen so far that would indicate anything else. If you take someone like the president, who a lot of women would find attractive if he came to

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fix their garbage disposal, and you make him the president of the United States, the Alpha male of the United States of America, and you sexualize his image with a lot of smears and false accusations so that people think he's Tom Jones or Rod Stewart, then a certain irreducible number of women are going to act batty around him. And I'm not talking about her personally; I'm saying that's a prediction. And so there's every possibility, with what we've seen, that this could be an entirely innocent affair."

So there you have the latest variation of what the president's spin 'n' smear artists like to call an "alternative narrative" in the Lewinsky matter. The president is a victim of Monica the Stalker (not that Lyons was talking about Lewinsky "personally"; no, no, as the clever man was careful to say, we're just musing out loud here about "predictions").

Well, of course it makes perfect sense. She's a woman, isn't she? And Clinton is a man, isn't he? And he's not any man, but the sort of man "a lot of women would find attractive if he came to fix their garbage disposal." And we know what women do with hunky garbage-disposal repairmen, don't we, boys? Of course, we do; Penthouse tells us so. What's more, Clinton is not, in fact, a lowly repairman of household appliances. Why, he's "the Alpha male of the United States of America," in the presence of whom "a certain irreducible number of women are going to act batty" and fall deluded to long-running, highly detailed fantasies in which they are obliged to perform hurried, loveless acts of sexual service upon His Alphaship and are then cast aside. Again, as every Penthouse reader knows, the stuff of every schoolgirl's dreams.

The poor man. The poor victim. My God, how he must have suffered. Stalked through the halls of his own home, and nowhere to turn for protection. Nothing standing between him and a 21-year-old stalker armed with -- well, never mind what she was armed with. Nothing except for his wife, his chief of staff, his deputy chief of staff, his secretary, his personal assistant, his special assistants, his National Security Council, his Marine guard, three-dozen or so Secret Service agents, and the Joint Chiefs of Staff. What's a president to do with a stalker but give her gifts, find her a lawyer, and advance her career?

The president has offered, sequentially, three reasons why he cannot himself say what happened: that he had to gather the facts;

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that he could not speak because of the rules of the courts; and that he dare not speak for fear that Ken Starr would twist his words against him. None of these arguments make sense if Clinton's relationship with Lewinsky was, as Gene Lyons put it, "a totally innocent affair." They all make sense, though, if Clinton needs time to see what all the evidence against him is before he presents the official alternative narrative.

Leon Panetta, Clinton's former White House chief of staff, said this weekend that the president "at some point . . . has got to tell the American people the truth of what was behind this relationship." Some point is now. By allowing his apparatchiks to continue to float "predictions" and lies and smears on his behalf, Clinton not only debases himself but the presidency. If there is a true alternative narrative, the president must present it, before more damage is done.

---- INDEX REFERENCES ----

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Newsweek

Diary of a Scandal

By Michael Isikoff
Wednesday, Jan. 21, 1998
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Monica Lewinsky. (AFP)

Editor's Note: Newsweek posted the following online exclusive on its America Online page, Newsweek Interactive, on Wednesday evening.

Last weekend, there were two extraordinary dramas playing out in Washington. On Saturday, at the offices of his attorney Robert Bennett, President Clinton was being questioned, under oath, by Paula Jones's lawyers as a media army waited outside. Clinton was asked if he had ever had a sexual encounter with Jones. As he has before, Clinton denied it. But unknown to the reporters in the street, the president was also asked about a woman named Monica Lewinsky. Eager to prove a pattern of sexual harassment, Jones's lawyers were searching for other women who might have been the subject of Clinton's advances. Under oath, the president denied ever having had a sexual relationship with Lewinsky.

Across town, in a small apartment at the Watergate, Lewinsky was in a bind. She had been informed the day before that Whitewater special prosecutor Kenneth Starr was investigating her for perjury and obstruction of justice in the Paula Jones case. Lewinsky had signed an affidavit swearing that she had never had a sexual relationship with the president. But, Starr's deputies had informed her, they had tapes of her suggesting that her denial was a lie -- and that they suspected she had been advised to lie by the president and by the president's friend and adviser, Washington superlawyer Vernon Jordan. Now Starr's people offered her a tough choice: cooperate with prosecutors and turn against the president, or face the possibility of criminal charges herself. Newsweek was aware of Lewinsky's situation. For nearly a year, Newsweek's Michael Isikoff had been aware of allegations that Clinton was having a sexual relationship with Lewinsky. That Wednesday, January 14, Isikoff learned that Starr was investigating obstruction of justice and perjury in the Paula Jones case, and that Lewinsky was a target of the investigation. For the next three days, Isikoff continued to report the story. On Saturday at 12:30 a.m., Isikoff and Newsweek editors heard a tape of conversations between Lewinsky and a woman named Linda Tripp. Newsweek could not independently verify the authenticity of the recording, and some of the statements on the tape raise questions about Lewinsky's credibility.

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But the tape seems to confirm that Lewinsky told at least one friend on repeated occasions that she was having an affair with the president, and that she had discussed with Clinton and Jordan the fact that she had been subpoenaed in the Paula Jones case. On the tape, Lewinsky sounded distraught but not unbalanced. She talks spontaneously about what she suggests is a sexual relationship with the president, expresses her anguish about being brought into the Paula Jones case, and plaintively declares her wish that the president would "settle" the case. Dejectedly, she says that Clinton is "in denial. He'll never settle." Lewinsky affirms to Tripp that Lewinsky will deny any sexual relationship when she is deposed by Jones's lawyers. "Look," she says, "I will deny it so he will not get screwed in the case, but I'm going to get screwed personally," Lewinsky says. When Tripp asks why, Lewinsky replies, "because it will be obvious... it will be obvious to him... that I told you." However, there was no clear evidence on the tape that would confirm or deny Tripp's allegation that Clinton or Vernon Jordan had coached Lewinsky to lie.

Because the magazine did not have enough time for sufficient independent reporting on Lewinsky, her credibility, and her alleged role in the drama – and in hopes of learning more about the truth by not interfering with Starr's probe at a critical juncture – Newsweek decided to hold off publishing the story last week. Above all, because Lewinsky's name had not surfaced, Newsweek's editors felt there was insufficient hard evidence to drag her into the media maelstrom.

On Tuesday, Jan. 20, the story began to leak out to a number of news organizations. On Wednesday, Jan. 21, Newsweek obtained what may be an important new piece of evidence. It is a written document allegedly given to Tripp by Lewinsky. The document coaches Tripp on "points to make in affidavit" in order to contradict the account of another former White House staffer, Kathleen Willey, who recently testified in her own deposition to unsolicited sexual advances made by the president in 1993. It was Tripp who partly confirmed Willey's claims that she had had a sexual encounter with Clinton – as reported in a Newsweek story in August. In these talking points, Tripp is urged to undercut Willey's credibility, be a "team player" and submit an affidavit for review to "Bennett's people" – Clinton's lawyers. It's not clear who prepared these talking points, but Starr believes that Lewinsky did not write them herself. He is investigating whether the instructions came from Jordan or other friends of the president. President Clinton has denied all allegations of a sexual relationship with Lewinsky or a cover-up; Jordan refused to comment on Wednesday and his lawyer did not return repeated phone calls.

Newsweek will have full coverage of this entire story in its next issue, on newsstands Monday, January 26. But because Newsweek and others have been able to confirm further details of the investigation – and because the magazine has developed exclusive reporting on the nature of the evidence – the editors of Newsweek have decided to publish this chronology of events on Newsweek Interactive on AOL :

Monday morning, January 12. Linda Tripp, met with her lawyers in Washington. She had been subpoenaed in the Jones case and needed to prepare her testimony. She had a disagreement with her

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lawyers, whom she feared were too close to the White House. Angrily, she left her lawyers' office and called the office of Whitewater independent counsel Kenneth Starr. Within a few hours, there were federal prosecutors and an FBI agent sitting in Tripp's living room in Columbia, Md. They heard Tripp tell an extraordinary story – and much of the drama that follows is based on Tripp's version of events.

She told the FBI agents and Starr's deputies that she had been a friend of Monica Lewinsky, 24. Lewinsky and Tripp worked together in the public affairs office at the Pentagon. Tripp described Lewinsky's background: Lewinsky had gone to work at the White House as an intern in the summer of 1995 shortly after graduating from Lewis and Clark College in Oregon. In December 1995, Lewinsky had been given full-time job as a staffer in the legislative affairs office in the White House. The previous month, Lewinsky allegedly told Tripp, she had begun having a sexual relationship with President Clinton. Lewinsky was 21 at the time. As Lewinsky told the story to Tripp, Lewinsky had been attracted to the president. At a White House party in mid-November 1995, Lewinsky wore a revealing dress and made eye contact with Clinton as he worked the crowd. The president and the young staffer had begun a consensual affair shortly thereafter. The president and Lewinsky allegedly had a number of sexual encounters, most of them during late-afternoon or weekend visits (and one late at night in a small private study off the Oval Office). Lewinsky told Tripp that she was flattered and excited by the attention from the president. She told Tripp that the president would sometimes ignore her frantic phone calls, but at other times he would call her in the middle of the night. Tripp told Starr's staff that she had personally heard messages from Clinton on Lewinsky's answering machine.

Tripp also told Starr's deputies that she had been angered and offended by what she considered the president's "callous" behavior toward Lewinsky. Tripp, a longtime federal employee who had begun work at the White House in the Bush administration, had had a number of run-ins with the Clinton White House. In 1993, Tripp was an executive assistant to Bernard Nussbaum, then the White House counsel. Early in the Whitewater probe, she had testified before a federal grand jury and the Senate Whitewater investigating committee about the so-called Travelgate affair, the firing of staffers in the White House travel office by the Clinton administration in 1993. She told Starr's assistants that she had been urged by her lawyers – whom the White House arranged to represent her – not to volunteer information she had about Hillary Clinton's role in Travelgate. Tripp also talked to Starr's deputies about Kathleen Willey. In the fall of 1993, Tripp said, she had seen Willey, a White House aide, shortly after Willey emerged from the Oval Office with her make-up smeared and her clothing askew. Willey told Tripp that she had just had a sexual encounter with the president. In late July, Tripp had told this story to Newsweek, which published it in an issue the first week of August. At the time, Bennett, Clinton's lawyer, publicly questioned Tripp's credibility. Tripp became concerned that she would be put in a compromised position if she was later subpoenaed by Jones's lawyers: either perjure herself, or tell the truth and be attacked by the White House – possibly at the cost of her job at the Pentagon. It was then, Tripp said, that she began to secretly record her phone conversations with Monica. Tripp's lawyer, Jim

Moody, denied that his client has a personal vendetta against the president. "She is not an enemy of this administration. She is a proponent of the truth."

As she anticipated, Tripp had been subpoenaed in mid-December by Jones's lawyers, who were trying to locate any and all alleged paramours of the president to bolster their sexual harassment case against Clinton. Realizing that she would have to testify under oath, Tripp told Lewinsky that she was going to tell the truth – that Lewinsky had told her that she was having an affair with the president. According to Tripp, Lewinsky responded that she intended to lie. She told Tripp that Clinton had told her not to worry about the Jones case because Jones's lawyers would never find out about the relationship. According to Tripp, Lewinsky said that Clinton had advised her to deny the affair. Tripp also reported that Lewinsky had told her that she had met with Vernon Jordan, Clinton's old friend and personal adviser.

Lewinsky first went to see Jordan at the instruction of Betty Currie, Clinton's personal secretary, last November. Jordan asked her to take her frustration and anger at Clinton and vent it at him. Lewinsky told Jordan she was worried about a subpoena from Jones's lawyers. Jordan offered to set Lewinsky up with an attorney, Frank Carter. (Carter declined comment.) According to Tripp, Lewinsky assured Jordan she would stick with "the cover story." Lewinsky said, "This is what I signed up for when I began the relationship."

Tripp told Starr that Lewinsky met again with Jordan at a later date in the back of his limousine. Jordan advised Lewinsky to remain silent. "They can't prove anything," Jordan allegedly told her. "If they thought they could, your answer is it didn't happen, it wasn't me." He told her that witnesses are never indicted for perjury in civil cases. He also promised to help Lewinsky get a job in the private sector. Earlier this month, Lewinsky responded to a subpoena in the Jones case by signing a sealed affidavit swearing that she had no relevant information to offer. In the affidavit, Lewinsky swore that she never had had a sexual relationship with Clinton.

At that first meeting on Monday, January 12, Starr's deputies listened to Tripp's story with great interest. After four years and at least $30 million, the investigation by the independent prosecutor's office is still moving slowly. Starr's deputies believe that they are being stonewalled by the White House at every turn. Here was an opportunity to get inside the president's protective circle. Jordan was of particular interest to Starr. Jordan is already under investigation by Starr in another matter, involving former Deputy Attorney General Webster Hubbell. Jordan is one of several friends of Clinton who helped get Hubbell lucrative consulting fees when Hubbell was under investigation by the Whitewater special prosecutor in 1994. Starr is investigating whether Jordan and others were funnelling hush money to Hubbell.

Starr's interest was also piqued by Tripp's tapes of her conversations with Lewinsky, which Tripp turned over to Starr in response to a subpoena. There are 17 of these audio tapes, consisting of about 20 hours of surreptitiously-taped phone conversations. Most of the tapes were made from Tripp's home in Maryland, a state which generally prohibits taping unless all parties to the conversation consent. (Tripp

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argues that the tapes were justified because she was trying to protect herself against allegations of perjury, according to her lawyer.) Newsweek has heard several of these conversations. On the 90-minute tape, Lewinsky can be heard weeping and clearly intimating that she had a sexual relationship with the president. She says that she intends to lie about it if questioned by Paula Jones's lawyers. She never directly names the president, referring instead to "the big he" and "the creep," but it is obvious from the tape that she is referring to Clinton. She ponders telling Clinton that she has revealed the affair to others, including Tripp. She hopes that, somehow, Clinton can be persuaded to settle with Jones. Maybe, Lewinsky wonders, she should threaten to tell all – tell Clinton that she intends to tell the truth if she is questioned by Jones's lawyers. "Look," Lewinsky says to Tripp, "Maybe we should just tell the creep. Maybe we should just say, don't ever talk to me again, I f---d you over [by telling others about the affair], now you have this information, do whatever you want with it." Linda says, "Well, if you want to do that, that's what I would do. But I don't know if you're comfortable with that. I think he [the president] should know." But Monica, sounding despairing, responds, "He won't settle [the Paula Jones case]. He's in denial." At another point in the tape, she says she simply cannot tell Clinton that she has revealed the affair to several others. "If I do that," she moans, "I'm just going to f---ing kill myself."

On the tape, Lewinsky can also be heard saying, "I have lied my entire life." In the context of the conversation, she is saying that it wasn't hard for her to conceal her sexual relationship with Clinton. But the statement raises the possibility that the affair itself was a lie, an exaggeration of a flirtatious moment, perhaps, that grew into a big lie. Still, Lewinsky sounds truly worried that her alleged relationship with Clinton will be exposed. She begs Tripp to lie about it. She speaks of exchanging gifts and letters with the president and worries that Jones's lawyers will find them and use them as incriminating evidence. At one point she says, "I was thinking about the fact that I sent a note to Nancy [Hernreich, as assistant to the president], a note to Betty [Currie, the president's personal secretary], and a note to thank them all for when my family came for the radio address. The note I sent to him, 'Dear Schmucko, thank you for being, as my little nephew said, it was great to meet the principal of the United States.'" Later she says that Clinton gave her a dress, and she makes a vague reference to an official photograph that Clinton sent her, apparently with some kind of personal inscription. She suggests to Tripp that, in response to the subpoena from Jones's lawyers, which asks for any letters, photographs, gifts, etc. that she received from Clinton, that she turn over a different photograph that the president gave her, one without the inscription.

Newsweek has obtained receipts from a Washington messenger service showing that Lewinsky sent packages addressed to the White House on nine separate occasions between October 7, 1997, and December 8, 1997. The contact number on the packages is 456-2990, the phone number of Clinton's personal secretary, Betty Currie. According to Tripp, Lewinsky told her that the packages were letters and in one case a sexually-provocative audio tape for President Clinton. Asked about the deliveries last week by Newsweek, Currie said she didn't recall them, but that she would look into the matter and get back to a reporter. Contacted again on Wednesday, Jan. 21,

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Currie said, "I have no knowledge whatsoever," and hung up the phone.

Another piece of key evidence would be secret service logs that would show whether Lewinsky came and went from the White House at odd hours. Jones's lawyers have subpoenaed secret service records, but the Justice Department has moved to quash that subpoena, citing in part executive privilege. Sources say that records show a "pattern of visits" by Lewinsky to the White House "in the late afternoons and evenings," with Currie listed as the contact.

Other administration aides wondered about Lewinsky, who was moved to the Pentagon in 1996. Lewinsky told Willie Blackwell, former deputy assistant secretary of defense, that she lost her job at the office of White House legislative affairs when Evelyn Lieberman, then deputy White House chief of staff, twice spotted her hanging around the West Wing and questioned why she was there. A spokesman for Lieberman said that Lieberman was displeased with Lewinsky's performance in part because she was spending a lot of time in the Rose Garden and at White House events rather than doing her job. It was the run-in with Lieberman, Lewinsky told Tripp, that prompted White House personnel to arrange a job for Lewinsky with Pentagon spokesman Ken Bacon. Lewinsky told Tripp that the president had assured her that he would "get her back" after the election, but it never happened.

On the tape recorded conversations that Newsweek listened to – a conversation that happened shortly before Christmas – there are at least two references to Jordan's first name, Vernon. It appears that Lewinsky did meet with Jordan, or at least claims to have met with him. The references to Jordan are cryptic, however, and neither support nor contradict the allegation that Jordan was encouraging Lewinsky to lie. She talks about acting "based on what Vernon said," but it's not clear what Jordan told her to say. At another point in the tape, in an apparent reference to the multiple subpoenas from Jones's lawyers, Tripp says, "Maybe Vernon was right, it's a huge fishing net because of the rumor." On Wednesday, Jan. 21, William Hundley, Jordan's lawyer, did not return repeated phone calls.

Tuesday, January 13. As she recounted her story to Starr's team on Monday, Tripp said that she was meeting with Lewinsky for drinks at the Ritz Carlton bar at Pentagon City the next day. Starr's deputies set up a sting operation. On Tuesday, the FBI agents working for Starr wired Tripp with a secret listening device. When Tripp met with Lewinsky around noon, there was a team of FBI agents and prosecutors listening as a hidden tape recorded the conversation. According to knowledgeable sources, Lewinsky again discussed conversations with Jordan about keeping quiet in the Jones case. She also talked about Jordan's efforts to get her a job in New York. (Lewinsky quit her Pentagon job on December 26; MacAndrews & Forbes, a New York firm that owns Revlon, confirmed that they offered Lewinsky a public relations job this month after she was referred to the company by Jordan, a member of Revlon's board of directors.) The incriminating tape gave Starr's deputies hope that they could "flip" Lewinsky and make a her a witness for the prosecution. They hoped to "sting" Jordan or Currie by getting Lewinsky to place phone calls to them that Starr's staff would monitor.

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Wednesday, January 14. Lewinsky picks up Tripp at the Pentagon and offers to drive her home. Lewinsky gives Tripp "talking points" about how she should respond to questions from Jones's lawyers in the Willey matter. Newsweek has obtained the document. "Points to make in affidavit," it reads. Tripp is to modify comments she had made to Newsweek back in July – that she had seen Willey coming out of the Oval Office with her make-up smeared. Tripp is now to tell Jones's lawyers that "you do not believe that what she claimed happened really happened. You now find it completely plausible that she herself smeared her lipstick, untucked her blouse, etc." The document also seems to reflect concerns that Tripp has already told others about Lewinsky's claims of a sexual relationship with the president. In case Tripp is questioned about the rumors about Lewinsky by Jones's lawyers, the talking points suggest that she say Lewinsky "turned out to be this huge liar" who "left the White House because she was stalking the P or something like that."

At about this time, Newsweek learned that Starr was investigating Lewinsky, Jordan, and Clinton. Newsweek told Starr's deputies that the magazine was planning to run with the story in the issue that appeared that Monday. Newsweek needed to get a response from the people involved. Starr's deputies asked Newsweek to hold off. The investigation was at a delicate stage. Starr was hoping to confront Lewinsky and persuade her to cooperate as a witness for the prosecution. Starr's deputies did not want to tip off Lewinsky or Jordan or the White House. Newsweek agreed to wait until Friday afternoon, in part because the magazine was reluctant to interfere with an ongoing federal investigation and in part because the editors believed that Newsweek would learn more about the truth behind the story by waiting.

Friday, January 16. Starr decided to formally expand his inquiry to investigate subornation of perjury and obstruction of justice in the Paula Jones case. In conversations the previous day, Starr's deputies had described Jordan as a principal target of the probe, and got Justice Department approval to seek a formal expansion of his jurisdiction. The three-judge appeals court panel that supervises the independent counsel gave its authorization. That same day, Starr's deputies had Tripp lure Lewinsky to another meeting at the Ritz Carlton. As the two were sitting down for lunch, FBI agents for Starr moved in and asked Lewinsky to step upstairs for a talk.

Friday-Saturday, January 16-17. Starr's deputies tried to "flip" Lewinsky. Obviously, she was in a fix. If she admitted to the affair, she would be contradicting her own sworn affidavit. But if she denied it, she would be vulnerable to criminal prosecution. Lewinsky called her mother in Los Angeles. At the urging of Starr's staff, Newsweek decided to wait one more day before contacting Lewinsky and Jordan for comment.

Saturday, January 17. A Los Angeles lawyer, William Ginsburg, flew to Washington to represent Lewinsky. Still uncertain about whether Lewinsky was telling the truth about a sexual relationship with Clinton and a White House cover-up, and running out of time to reach the major players in the story – or assess Lewinsky's credibility or role – Newsweek, whose deadline is Saturday night, decided to hold off publication.

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Monday, January 19. Negotiations between Starr's staff and her attorneys broke down. On Monday morning, Lewinsky's name surfaced in the Drudge Report, a widely read but somewhat unreliable gossip column on the Internet. Drudge had picked up rumors that Newsweek was debating whether to run a piece about Lewinsky, and reported that after a "screaming fight" in the editors' offices on Saturday night, the story had been spiked. (There had been no screaming; the story was not spiked but put on hold while Newsweek's reporters continued to gather information.) According to Starr's deputies, the fear that Lewinsky's name would become widely known was enough to torpedo the negotiations between Starr and her Lewinsky's lawyers. As of now, Lewinsky is not cooperating. According to knowledgeable sources, Starr is now considering whether to indict her for perjury. Lewinsky is scheduled to be deposed by Jones's lawyers on Friday. Sources tell Newsweek that she will take the Fifth Amendment.

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ABC NEWS

SHOW: ABC NIGHTLINE (11:35 pm ET)

JANUARY 21, 1998

Transcript # 98012101-j07

TYPE: PACKAGE

SECTION: NEWS

LENGTH: 6419 words

HEADLINE: DARK DAY AT THE WHITE HOUSE

ESTS: WILLIAM GINSBERG, GEORGE STEPHANOPOULOS

BYLINE: JACKIE JUDD, MICHEL MCQUEEN, SAM DONALDSON, TED KOPPEL

HIGHLIGHT:
SERIOUS CHARGES AGAINST THE PRESIDENT

BODY:

ANNOUNCER: January 21st, 1998.

TED KOPPEL, ABC News: (voice-over) She did work at the White House, but was there a relationship between her and the president?

Pres. BILL CLINTON: There is no improper relationship and I intend to cooperate with this inquiry.

TED KOPPEL: (voice-over) This woman says she has evidence of an improper relationship.

Pres. BILL CLINTON: It was not a sexual relationship, an improper sexual relationship or any other kind of improper relationship.

TED KOPPEL: (voice-over) But nevertheless, independent counsel Kenneth Starr now believes he may have his strongest case against the president in four years

res. BILL CLINTON: I can tell you I did not do that.

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ABC NIGHTLINE, JANUARY 21, 1998

TED KOPPEL: (voice-over) Tonight, dark day at the White House, serious charges against the president.

ANNOUNCER: From ABC News, this is Nightline. Reporting from Washington, Ted Koppel.

TED KOPPEL: As some of you know, we were in Havana last night reporting on Cuba and the pope's impending visit. We had planned to be there for at least another day. Around mid evening yesterday, we got a call from our office here in Washington. Our colleague, Jackie Judd, had been told by sources she considered totally reliable that there were new allegations against President Clinton. There was talk of an affair with a very young White House intern, charges that the president had encouraged her to lie about the relationship. Independent counsel Kenneth Starr had been authorized to investigate the charges.

It was clearly an important story, but to rush something that explosive on the air, to shoehorn it at the last minute into a photograph that was primarily about the pope's visit and its impact on Cuban and Cuban - American families would have seemed awkward at the very least.

We flew out of Havana this morning. Our correspondents have been gathering information all day. It has not yet been established that any of the charges are true, but as you will hear tonight, over the last 24 hours, the story has already metastasized.

Jackie Judd, who broke the story, begins our report tonight with a chronology of how this latest storm around the president evolved.

JACKIE JUDD, ABC News: It is possible that President Clinton wouldn't be facing all this had it not been for a remark made by his lawyer, Robert Bennett, on a summer day last year about a then White House aide, Linda Tripp. August 11th, Bennett tells a Newsweek reporter that Tripp is "not to be believed" when she says that the president made a pass at a White House aide.

Tripp is angry that her word was doubted and apparently decides it won't happen again. She begins recording telephone conversations with a friend, former White House international, Monica Lewinsky, who allegedly confides in Tripp that she's having an affair with the president.

December 17th, Lewinsky and Tripp are subpoenaed by Paula Jones' legal team as part of the lawyers' search for evidence of sexual misconduct by Mr. Clinton. In the days following, there is a series of taped conversations in which Lewinsky allegedly says the president tells her to deny the relationship and the president's friend and adviser, Vernon Jordan, tells her to lie to investigators, even under oath.

January 7th, Lewinsky files a sworn affidavit in federal court denying she had a sexual relationship with Mr. Clinton and arguing that she has nothing relevant to testify about. Around this time, Lewinsky allegedly tells Tripp that she, too, must lie.

January 10th or 11th, Linda Tripp, armed with the tapes, goes to the independent counsel's office and investigators take her very seriously. A Newsweek magazine reporter says that he has heard some of those tapes. In one, he writes,

ABC NIGHTLINE, JANUARY 21, 1998

Lewinsky "Can be heard weeping and clearly intimating that she had a sexual relationship with the president," but that she intends to lie about it. Newsweek quotes her as saying, "I have lied my entire life" and says, "the statement raises the possibility that the affair itself was a lie, an exaggeration of a flirtatious moment."

January 15th, lawyers from Ken Starr's office go to the attorney general asking for jurisdiction over this investigation and within a day, they have what they want. Today, January the 21st, Starr's office serves a broad subpoena on the White House for documents and visitors logs related to Monica Lewinsky. Tonight, it does seem that this is not just a matter of tapes, but documents as well. ABC News has obtained what is potentially one of the most damaging pieces of evidence indicating a cover-up. It's a page of talking points which seems to have been drafted by a lawyer, a page Lewinsky allegedly handed to Tripp, who was about to give an affidavit involving another case of alleged sexual harassment.

Listen to some of the language. "You now do not believe that what she claimed happened really happened." "You now find it completely plausible that she herself smeared her lipstick, untucked her blouse, etc." "You never saw her go into the Oval Office or come out of the Oval Office."

"You have never observed the president behaving inappropriately with anybody."

It is hardly the kind of language that a 24-year-old secretary would draft.

This is Jackie Judd for Nightline in Washington.

ED KOPPEL: Clearly, the White House itself is taking the potential impact of all these news stories very seriously. ABC's John Donvan reports on an exceedingly active day at the White House in front of the cameras and behind-the-scenes.

JOHN DONVAN, ABC News: (voice-over) It starts last night at midnight. Israel's prime minister, who arrived at 10, has now departed. But some of the president's aides stay up for hours. They have a fire to put out. 9:45 this morning, presidential spokesman Mike McCurry summons reporters to his office for an off camera chat, as he does every morning. Uncharacteristically, McCurry reads a prepared statement.

"The president is outraged by these allegations. He's never had any improper relationship with this woman and he's made clear from the very beginning that he wants people to tell the truth in all matters."

9:55, reporters charge for McCurry's office. Within minutes, his statement is on the news wires and on the air. McCurry was later to confirm that three lawyers had worked on that statement. In the attempt to muffle this bomb blast, every word is critical.

GEORGE STEPHANOPOULOS, ABC News Analyst, Former Clinton Adviser: When something like this happens, the White House goes into full crisis mode and this is really as shocked as I've ever seen the White House, including in my time there.

JOHN DONVAN: (voice-over) 10:05 A.M., one of the president's lawyers, Robert Bennett, is the next one up.

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ROBERT BENNETT, President Clinton's Attorney: Well, she's under oath saying there was nothing. The president adamantly denies it and I smell a rat in all this.

1st REPORTER: Do you think it's entirely faulty? Do you think it's fabricated?

ROBERT BENNETT: Is what? I don't know what "it" is.

1st REPORTER: Well, the notion that there are audiotapes of her talking to friends about there being an affair.

ROBERT BENNETT: I don't know, I know nothing about that. Before I'd comment on it, I'd want to investigate. What I do know is the president adamantly denies it and she under oath denies it.

JOHN DONVAN: (voice-over) By now, reporters are taking a closer look at the McCurry statement and they're seeing problems with it.

LAURENCE McQUILLEN, Reuters: You know, the fact that he did nothing improper is not the same thing as saying I never met this woman and I have no idea what's going on.

JOHN DONVAN: (voice-over) And reports who have covered other presidents are comparing it to another scandal.

HELEN THOMAS, UPI: Even a year before, we all knew that Nixon would have to resign. But this is, that even, this president has never known a moment of peace.

DEBORAH ORIN, "New York Post":It's a very, very serious story. It's basically Paula Jones meets Whitewater meets Watergate. That's a serious story.

JOHN DONVAN: It's now just after one o'clock in the afternoon. That means that McCurry is now officially running late for his daily briefing when he goes on camera with reporters. Instead, he is still in his office behind me. He is meeting with his advisers. They are trying to figure out how exactly they want to answer the questions that will come up at the briefing.

(voice-over) 1:24 P.M., McCurry appears and more than a dozen times in more than a dozen different ways, he is asked essentially the same question. The president's statement denies an improper relationship, but why doesn't it explicitly say there was no sexual relationship? McCurry has one answer.

2nd REPORTER: What do you mean by an improper relationship?

MIKE McCURRY, White House Spokesman: I'm not going to parse the statement. You all got the statement I made earlier in a speech so, I'm not going to parse the statement.

3rd REPORTER: You're standing by this?

MIKE McCURRY: Claire, I'm just not going to parse the statement for you. I'm not characterizing it beyond what the statement is. My own good judgment tells me not to try to parse this statement. You've tried now I think a dozen

ABC NIGHTLINE, JANUARY 21, 1998

different ways to get me to amplify on this statement. I'm clearly not going to do it.

JOHN DONVAN: But the White House message was to be honed further by none other than Mr. Clinton himself. As it happens, the president had agreed long ago to sit down today for interviews with three news organizations about his State of the Union address next week. Canceling the interviews was not an option because doing so could leave the impression that Mr. Clinton is hiding something.

JIM LEHRER: Mr. President, welcome.

JOHN DONVAN: (voice-over) So they go forward. 3:15 P.M., the president is asked by Jim Lehrer of Public Broadcasting to clarify.

JIM LEHRER, PBS: No improper relationship, define what you mean by that.

Pres. BILL CLINTON: Well, I think you know what it means. It means that there is not a sexual relationship, an improper sexual relationship or any other kind of improper relationship.

JOHN DONVAN: (voice-over) But there's a problem with this answer, too, because when Mr. Clinton said that there is not a sexual relationship, that left unclear whether there had been one in the past. In fact, he answered this way twice.

JIM LEHRER: You had no sexual relationship with this young woman?

Pres. BILL CLINTON: There is not a sexual relationship. That is accurate.

JOHN DONVAN: (voice-over) 4:26 P.M., Mr. Clinton talks by telephone with Martin Candracki (ph) from the biweekly Roll Call. This time as the tape is played back, Mr. Clinton sounds more specific.

MARTIN CANDRACKI: What exactly was the nature of your relationship with her?

Pres. BILL CLINTON: The relationship's not improper and I think that is important enough to say. The relationship was not sexual.

JOHN DONVAN: (voice-over) 4:40 P.M., Mr. Clinton talks with National Public Radio's Mara Liasson. She tries a different tact.

MARA LIASSON: (ph) Did you have any kind of relationship with her that could have been misconstrued?

Pres. BILL CLINTON: Mara, I'm going to do my best to cooperate with the investigation. I want to know what they want to know from me. I think it's more important for me to tell the American people that there wasn't improper relations, I didn't ask anybody to lie and I intend to cooperate. And I think that's all I should say right now so I can get back to the work of the country.

JOHN DONVAN: (voice-over) The work of the country.

Pres. BILL CLINTON: The first lady of the United States.

JOHN DONVAN: (voice-over) Eight o'clock this evening and that's what Mr.

Clinton shows himself doing, at a celebration of the heritage of the White ·ouse. His staff says this scandal will not distract Mr. Clinton. At one ɔint today they publicly laughed when a reporter asked whether this day was the low point of the Clinton presidency. But tonight, some lights are still burning late in the West Wing and a fair question seems to be whether the worst days for this White House are yet to come.

John Donvan for Nightline at the White House.

TED KOPPEL: When we come back, the story of two lawyers, hardly household names, but men who, for better or worse, will have a significant impact on the president's future.

(Commercial break)

TED KOPPEL: It will no one who knows the way Washington works during the Clinton administration to hear allegations that the president send Monica Lewinsky to see a lawyer by the name of Vernon Jordan. Jordan is an imposing figure of a man who has long been known as an intimate of Bill Clinton's. Here's more from Nightline's Chris Bury.

CHRIS BURY, ABC News: (voice-over) In Washington, he is known as Mr. Smooth, Vernon Jordan, the Clinton golfing buddy and prominent lawyer, is the ultimate Washington insider and when Bill Clinton gets into trouble, Jordan is often there behind-the-scenes to quietly help clean up the mess.

DAVID MARANISS, Clinton Biographer: Vernon Jordan is what you would call a fixer, not in the old-fashioned sense of a boxing fixer, but someone who gets hings done for you politically, he's a good friend to have. And he has been Bill Clinton's friend for quite some time and has helped him maneuver his way out of trouble at various points, advised him how to deal with very sensitive issues.

AL HUNT: He's totally comfortable, he's totally at ease with Vernon and he has total confidence in Vernon. Vernon can tell him things that other people could not. So I Vernon Jordan in many ways is as close to Bill Clinton as anyone.

CHRIS BURY: (voice-over) Independent Counsel Kenneth Starr has already hauled Jordan before a grand jury because of allegations he helped steer lucrative legal work to Webster Hubbell (ph) in an effort to buy his silence in the Whitewater investigation. Hubbell earned hundreds of thousands of dollars after he was indicted for cheating clients at the Rose law firm.

(on camera) Now the independent counsel is directly targeting Vernon Jordan because of this new evidence alleging President Clinton told Monica Lewinsky to see Jordan and that he advised her to lie in a sworn deposition. Sources also say Jordan helped Lewinsky find a lawyer, who has since been replaced. Jordan has no comment, according to his attorney, and today the president denied asking Jordan to urge Lewinsky to lie.

Pres. BILL CLINTON: I absolutely did not do that. I can tell you, I did not do that. I did not do that. He is in no way involved in trying to get anybody to say anything that's not true at my request.

CHRIS BURY: (voice-over) Al Hunt, executive Washington editor of the Wall

Street Journal doubts Jordan would ask anyone to lie under oath.

HUNT: I've known Vernon Jordan for almost 20 years. He's a friend. I respect him a great deal and it would stun me if that allegation is true. He's too smart. He's too good a lawyer. He's too careful. He's too cautious. That's not something Vernon Jordan would have done. Would he have told the young lady that we'll help you if you're in trouble? Yes. But would he have told her to commit perjury? I just find that impossible to believe.

CHRIS BURY: (voice-over) In fact, ABC News has learned Jordan did try to get Monica Lewinsky a $40,000 a year job at the Revlon Corporation, where he sits on the board of directors. In a statement tonight, Revlon confirmed Lewinsky was referred by Vernon Jordan and offered a job this month, an offer Revlon rescinded today.

(on camera) Curiously enough, Revlon is the same company that paid Webster Hubbell $50,000 for legal work in 1994 after he left the Justice Department. Nightline has also learned U.N. Ambassador Bill Richardson, a key Clinton ally, offered Monica Lewinsky a job last October. Tonight, Richardson's office insisted there was no pressure by any individual to hire her and nothing improper occurred.

Even before he was elected president, Bill Clinton turned to Vernon Jordan for advice on dealing with press questions on allegations of womanizing. Clinton biographer David Maraniss recounts a strategy session in September of 1991.

DAVID MARANISS: His top advisers were meeting here in Washington going over what they knew was a touchy issue, which was Clinton's sexual history. They decided hat they would come out and say that there had been problems with their marriage but that they had gotten over them. And then after that meeting, Clinton went out to dinner with Vernon Jordan and he came back and the same advisers were still in the room talking about it some more. Clinton walked into the room and said well I just had dinner with Vernon Jordan. He said don't tell 'em anything. Screw 'em.

CHRIS BURY: (voice-over) If Vernon Jordan represents the private, quiet approach, long time Clinton aide James Carville has been the president's public attack dog, particularly in the case of Paula Jones.

JAMES CARVILLE: (January 18, "Meet The Press") It's all about money, plain and simple, and a dose of, and a healthy dose of right-wing politics. That's all it is.

CHRIS BURY: (voice-over) But the president's lawyers have been far more circumspect. In a court filing last December, they wrote, "President Clinton denies that he engaged in any improper conduct with respect to plaintiff, Paula Jones, or any other woman," almost the exact phrase the White House used today in its statement about the president's alleged relationship with Monica Lewinsky.

STUART TAYLOR, "National Journal":I think that the emptiness of the White House denial today, no improper relationship, and they wouldn't go on and detail that, becomes clear when one looks at the fact that in a court proceeding, his lawyer very deliberately filed a statement on his behalf that he never had an improper relationship with any woman. I think that you can't read that and say all

right, is he saying he's never had an extramarital relationship with any woman? don't think so.

CHRIS BURY: (voice-over) Tonight, the president's top lawyer, Bob Bennett, was seen leaving the Washington office of Vernon Jordan. Once again, Bill Clinton, in times of trouble, is turning to his trusted friend. And Jordan, the one man besides the president who may know the full story, isn't saying a word.

This is Chris Bury for Nightline in Washington.

TED KOPPEL: Earlier this evening I spoke with Monica Lewinsky's attorney, William Ginsberg in Los Angeles. He confirmed that tapes do exist of his client talking with a friend about President Clinton, though he has not yet heard those tapes. Mr. Ginsberg said that regardless of what is on the tapes, his client is being victimized.

Mr. Ginsberg, you made a particularly delphic comment this morning suggesting that if one set of circumstances are true then the president is a misogynist, if another set of circumstances are true then Kenneth Starr is, what did you say, a bully or?

WILLIAM GINSBERG, Lewinsky Attorney: (Los Angeles) No, I said either way that my client stands to be ravaged in this situation and if the OIC ...

TED KOPPEL: What's the OIC?

WILLIAM GINSBERG: Office of Independent Counsel has no substantial evidence or reason to go after Monica Lewinsky, they're ravaging her. If it's true she had some sort of relationship with the president, then she's being ravaged. She's a victim any way you cut it, all around.

TED KOPPEL: Can you, without violating attorney-client privilege, tell me whether the previous lawyer that she had was, in fact, acquired for her by Vernon Jordan?

WILLIAM GINSBERG: I'm not prepared to say because I don't think it's accurate that he was acquired for her by Vernon Jordan. I believe that he's a friend of Vernon Jordan's and Monica was referred to him by Vernon Jordan.

TED KOPPEL: Oh, so in other words it was at his recommendation that she went to this lawyer?

WILLIAM GINSBERG: His suggestion.

TED KOPPEL: His suggestion. And at whose suggestion was it that she go to Vernon Jordan?

WILLIAM GINSBERG: I don't know.

TED KOPPEL: Well, as you know, it is commonly held that it was at the president's suggestion.

WILLIAM GINSBERG: Well, let me say this so I'm not acting coy. I don't mean to be coy. There's no question that she was seeking other employment after she left the Pentagon employment and her friends at the White House pointed her

towards Vernon Jordan as a source of possible interviews or connections, as well a other people.

TED KOPPEL: Where does it go next as far as you're concerned?

WILLIAM GINSBERG: It goes obviously to the issue of the depositions on Friday in the Paula Jones case and then it goes to further discussions, if any, or discovery motions and techniques in order to find out what the OIC has, doesn't have and to see what they want to do and what we can do with them in some fn.

TED KOPPEL: Is it possible for the federal government or the independent counsel or anyone, for that matter, to give her legal protection so that she might be able to say something other than she said in that affidavit? Just a hypothetical question.

WILLIAM GINSBERG: And hypothetically, as a civil lawyer, I can tell you that yes, it is possible.

TED KOPPEL: And who would best be positioned to give her that kind of protection?

WILLIAM GINSBERG: Well, I think that the investigatory body, which I understand to be the Office of Independent Council, is in the position to make any offer like that, if they had a mind to.

TED KOPPEL: So when you come out, I'm coming back now to the initial question that I asked you, that delphic comment about the misogynist on the one hand and the bully on the other, that could be a little bit of a fishing expedition too, couldn't it?

WILLIAM GINSBERG: Oh, absolutely, and I want to make it clear that all I was trying to say with those big words was that she's ravaged one way and she's ravaged the other way. My client is who I'm concerned about and I'm afraid that she is sullied no matter which way this comes out.

TED KOPPEL: And she needs protection and at the moment the person who could best give it to her is Mr. Starr?

WILLIAM GINSBERG: Or myself and my colleague in Washington or her lawyers. But you're absolutely correct. Mr. Starr's office could give her protection, that's right.

TED KOPPEL: Mr. Ginsberg, again, thanks very much indeed.

WILLIAM GINSBERG: Mr. Koppel, thank you. The pleasure is mine.

TED KOPPEL: And joining me now live once again here in Washington, my colleague Chris Bury. In a sense, Ken Starr has been the Captain Ahab chasing Moby Dick, Bill Clinton, for four years now and here comes this young woman who really needs his help. I mean it's something of an irony, isn't it?

CHRIS BURY: It is. You know, Ken Starr has spent more than three and a half years, about $30 million on this investigation, old Arkansas land deals and travel records, travel office firings and billing records and none of it has really stuck. But this is a substantial break, to have a witness literally

coming in off the street with hours and hours of tapes alleging a possible obstruction of justice, possible perjury in the Oval Office and then to be able to wire that witness, Linda Tripp, to gather even more evidence, the independent counsel considers this the most significant evidence he's gathered in the Whitewater investigation and tomorrow Kenneth Starr is going to have a rare news conference here in Washington to talk about it.

TED KOPPEL: Chris Bury, thanks very much. Later in our broadcast, we'll talk to two men who were President Clinton's most senior advisers. But first, when we come back, how today's story played across the country.

(Commercial break)

TED KOPPEL: Most of the time, the American public is less engaged in or concerned by scandals at the White House than the media which covers those stories. Today, we asked Nightline's Michel McQueen to see how these latest revelations are playing out across the country.

MICHEL McQUEEN, ABC News: (voice-over) For the radio talk show hosts who live or die on the day's juicy stories, this one was just too good to resist.

1st TALK SHOW HOST: This is not a new allegation. America understood these charges against Bill Clinton back in '92 when he was elected.

MICHEL McQUEEN: (voice-over) For some, it was a joke.

2nd TALK SHOW HOST: If, in fact, Hillary cut him off back in 1992, interns are fair game.

1st CALLER: What is your obsession with Bill Clinton's wiener? Who in the heck would ever want to be president in this country?

MICHEL McQUEEN: (voice-over) For others, especially the conservative hosts and callers for whom Bill Clinton represents everything they despise, it was just the latest evidence of his unworthiness.

2nd CALLER: If he is guilty, then he must be impeached. We must restore the integrity of the presidency of the United States.

3rd CALLER: This is the best day for any Republican I think in the United States.

3rd TALK SHOW HOST: I think, as I've said before, that the office of the presidency is completely defined at any given moment in history by the person who occupies it.

MICHEL McQUEEN: (voice-over) Unlikely as it seems, these latest allegations have put a twentysomething intern in a position to define the Clinton legacy.

4th TALK SHOW HOST: The Clinton presidency will be characterized and his legacy will be sleaze.

MICHEL McQUEEN: (voice-over) Take it from an authority, convicted Watergate coconspirator, now radio talk show host G. Gordon Liddy.

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G. GORDON LIDDY, Radio Talk Show Host: There was some major segments of the population who for one reason or another had a visceral antagonism toward Richard Nixon and wanted him "gotten". However, and unfortunately he provided the ammunition to his enemies. I think there is a parallel here.

MICHEL McQUEEN: If there is a parallel, nobody was in a hurry to say so. The echo you heard in my office today was the sound of my phone not ringing.

Call after call seeking reaction from law makers was not returned.

(voice-over) House Speaker Newt Gingrich was typical of the Congressional leadership who said.

Rep. NEWT GINGRICH, (R), GEORGIA: I just don't want to comment about why I'm not going to comment. I'm not going to comment. Good try, though.

MICHEL McQUEEN: (voice-over) Some said privately there was nothing to be gained by stepping in somebody else's mud. One of the few who felt differently was Congressman Lindsay Graham (ph) of South Carolina, who told ABC's John Cochran ...

Rep. LINDSEY GRAHAM, (R), South Carolina: Now we're down to an issue that people can understand. If he is indicted it is time for us to have an inquiry into an impeachment.

MICHEL McQUEEN: (voice-over) But most were cautious. Congressman Henry Hyde, chairman of the House Judiciary Committee, said he does not yet know whether hearings are warranted.

Rep. HENRY HYDE, (R), Illinois: It would seem to me obstruction of justice and subornation of perjury are charges that would deserve hearing on impeachment, but I want to wait until we have some substance, rather than mere allegations.

MICHEL McQUEEN: And if law makers were reticent, so was the public, at least for now. The ABC News poll taken tonight showed that nearly half of those surveyed had no opinion on whether the president did or did not have an affair with the former intern. And even if that did occur, 60 percent said they wanted Clinton to remain in office.

This is Michel McQueen for Nightline in Washington.

TED KOPPEL: There is an interesting footnote to that ABC News poll that Michel just mentioned. As unconcerned as Americans seem to be about the allegations of sexual misconduct by the president, a significant majority are looking quite differently at charges that President Clinton may have told the intern to lie about the affair. While 21 percent said even that was not important, an overwhelming 76 percent said they think it is.

When we come back, two men who've been inside the Clinton White House during some other difficult days.

(Commercial break)

TED KOPPEL: In their previous lives, David Gergen, editor at large of U.S. News & World Report and ABC News consultant George Stephanopoulos have attended

their share of crisis meetings at advisers to the president in the Clinton White 'ouse. David Gergen joins us here in Washington. George Stephanopoulos is in ır New York bureau.

Let me pose this question to both of you. George, maybe you'd like to begin. Why does anyone ever think that these carefully parsed phrases, which sound all right as they sort of go by the first time but eventually you look at 'em and say wait a second, why is he talking about there is no relationship now when what he's really being asked about is was there ever?

GEORGE STEPHANOPOULOS: Yeah, that was a tough moment to watch. I think, I don't know if David will agree with this, but I think a lot of those phrases turn out like that because you have a conflict between the lawyers on the one hand who are thinking about legal proceedings and court actions and political people like me who are looking for what's going to make a clear, strong impression immediately with the public.

TED KOPPEL: But the lawyers don't have to worry, David, unless there is something to worry about. I mean, there's no problem saying was, is, will not be if it hasn't happened and if it isn't going to happen.

DAVID GERGEN, "U.S. News & World Report":Well, the president did say, if you'll recall, later in the day there was no relationship. But even so, I think George is right. In this case the lawyers prevailed and Ted, in the back of their minds must be the fact that on this previous Saturday, the president was in a legal deposition of his own for some six hours in which apparently he was asked about this and I'm sure they wanted to make sure whatever he said in that deposition squared with what he told Jim Lehrer when he sat down this afternoon.

TED KOPPEL: Somehow, George, the president seems to believe when he is asked has there ever been an improper relationship that any relationship with a woman over the age of 21 is proper as long as she is a consenting adult, because clearly there have been some improper relationships in his past, which he has admitted, but now he seems to define those as not being improper. Can you shed some light on that?

GEORGE STEPHANOPOULOS: Yeah, I think again that is a problem, that's the word they used in the legal pleadings and I think they wanted to be consistent because one of the biggest problems when you're dealing with legal judgments is any inconsistency which can then lead to a charge of perjury. Again, I don't think the president was trying to say that. He then followed up and said there was no sexual relationship at all. But the real problem in the end in this kind of a situation is if the lawyers control the pen, you can't get that clear message out.

TED KOPPEL: David, what do you make of the ABC poll which, and of course terribly early and I'm not sure that polls at this time mean an awful lot, but even now, it's sort of interesting that the public doesn't seem terribly upset about the sexual allegations, does seem to be concerned about the ones that the president might have been involved in urging someone to tell an untruth.

DAVID GERGEN: I think that the poll you had was the best news we've had in this whole sordid day because it showed that the American people were holding their breath and waiting for the evidence to come in and it seems to me that's what's essential here, Ted, and that is we are either facing the worst act of self -

destruction or the worst smear of any president in the 20th century and I think the American people are very rightly saying wait a minute guys, let's get more evidence and then we'll make up our minds. And I think that's about where we are tonight. The trail is not pretty and this is a very depressing case. But when it comes to what was improper or not, I have a feeling about this. The public is not yet zoning in on the question of the relationship but given what the president said today on television, he put that question in play. If he had a relationship and went before the country today and lied about it, I think that number of negative feeling is going to go way up, regardless of what the negative consequences are.

GEORGE STEPHANOPOULOS: David's ...

TED KOPPEL: George, I need to tap into your person knowledge of the president. This is not a man who ever rolls over and plays dead, is it?

GEORGE STEPHANOPOULOS: Definitely not. I was just thinking back to about six years ago tonight on the day of the Jennifer Flowers (ph) press conference and he fought back then. I'm not sure the exact same techniques are going to work this time. Simply trying to change the subject won't put it away. By contrast the Nightline poll in January 1992, 80 percent of the people thought this wasn't a legitimate issue. Even though the first news is positive, it's not as it was back in 1992. The president is going to have to reassure people about this central question.

TED KOPPEL: It's been a long day for both of you. George, thank you very much. David, thank you. In a moment we'll go to the White House to wrap up the day's events with my old friend and colleague, Sam Donaldson.

(Commercial break)

TED KOPPEL: Back at the White House beat that he once defined, our once and present White House correspondent, Sam Donaldson. It looks dreadful, Sam, but I know you to be not just a tough but also a very fair reporter. How seriously should these charges be taken?

SAM DONALDSON, ABC News: (The White House) Well, Ted, we take it one step at a time. The bombshell has broken and we're all now baying after what are the facts, what do these words mean, what do you mean not now, maybe later. But as we go down the line, it will all sort out. I remember the Watergate days and at first a lot of people said we'll never know the truth. The wiser old heads, and I wasn't one in those days and maybe not now, said no, no. It will parse out. You know, Ted, the old phrase, the mills of the gods grind exceedingly slow but exceedingly fine. If Mr. Clinton is telling in all of these respects, about his sexual relationship, and maybe that's the minor part, but particularly about whether there was any effort to get people to lie, I think that'll come out and if he's not telling the truth, he's cooked.

TED KOPPEL: Sam, throughout the entire Whitewater affair, throughout the entire Travelgate affair, throughout the FBI file affair, there have been constant efforts on the part of some of our colleagues to draw analogies, contrasts, comparisons to Watergate and they have never seemed appropriate. Does it seem more appropriate to you now?

SAM DONALDSON: Well, you can't compare a burglary and whether President Nixon

knew anything about that and so far I've not seen any credible evidence that he did, and the cover-up with what's going on here or appears to be going on here. But I will say this, the question about whether the president had a sexual relationship with this young woman, while maybe interesting, it may be titillating, is not something that threatens his presidency, in my judgment, and I'm not making a moral judgment on that question. I'm simply saying that the American people have taken a look at this. The question, though, of whether he committed perjury in a deposition last Saturday, I don't know whether he did or not, I'm not suggesting he did, but if he denied having a sexual relationship under oath and credible evidence of a massive nature can be presented that he did, well then impeachment investigations will be serious.

TED KOPPEL: Sam, in the few seconds that we have left, I gather that there is already a shopping expedition, in effect, of people who are coming to the White House now and looking for files that will give some sense of when this young woman, after she had left the White House, visited the White House. Just quickly bring us up to speed on that.

SAM DONALDSON: Well, she visited the White House, we know, and she checked herself in in the sense that she had to say who she was visiting. It was one of the president's secretaries, who may not have been here if it was late at night. Those files will be turned over to the independent counsel under subpoena. I'm sure the White House means it that it will cooperate and we'll see about that. I must tell you a lot of people are visiting the White House. Tonight I ran into Hillary Rodham Clinton's brother, Hugh Rodham, who came through at about 11:20 and he didn't look very happy. I take it he's back up there in the family quarters right now and they're having a conference.

ED KOPPEL: Sam, I guess you're going to get at least two or three hours sleep before you're back here in the morning.

SAM DONALDSON: I'll be back here on Good Morning America with Lisa McRee and all the rest of the people.

TED KOPPEL: I know you will and we will continue to report this story tomorrow on Good Morning America. In the meantime, I'll be back in a moment.

(Commercial break)

TED KOPPEL: ABC News will continue to follow this story closely in the coming days. Tomorrow on Good Morning America, an interview with Paula Jones' adviser, Susan Carpenter McMillan.

That's our report for tonight. I'm Ted Koppel in Washington. For all of us here at ABC News, good night.

LANGUAGE: ENGLISH

LOAD-DATE: January 22, 1998

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ABC NEWS

SHOW: WORLD NEWS TONIGHT WITH PETER JENNINGS (5:30 pm ET)

JANUARY 22, 1998

Transcript # 98012202-j04

TYPE: PACKAGE

SECTION: NEWS

LENGTH: 475 words

HEADLINE: THE NEXT STEP FOR MONICA LEWINSKY

YLINE: JACKIE JUDD, PETER JENNINGS

HIGHLIGHT:
LEWINSKY'S LAWYER WANTS JONES DEPOSITION DELAYED

BODY:

PETER JENNINGS: Try as the White House will to control the flow of information here -- which is a natural thing for a White House to do -- the story to, a large extent, is developing outside their control. So much depends on what Monica Lewinsky does or says, more specifically, next. No one knows that better than ABC's Jackie Judd.

JACKIE JUDD, ABC News: (voice-over) Monica Lewinsky's lawyer, William Ginsburg, arrived in Washington late today to prepare his client for whatever comes next. It is supposed to be a deposition tomorrow before lawyers for Paula Jones who plan to ask Lewinsky if she had an affair with the President. But Ginsburg is now suggesting that deposition might be delayed.

WILLIAM GINSBURG, Monica Lewinsky's Attorney: We have a hearing tonight with the judge in Arkansas, Judge Wright, and she will determine then whether the hearing is going to go forward.

JACKIE JUDD: (voice-over) Ginsburg wants it delayed because Lewinsky is now so embroiled in Ken Starr's criminal investigation, and he wants some time, possibly to strike a deal with Starr. This would not be the first time for such discussions.

WHITE HOUSE
EXHIBIT
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ABC News learned today, that after Lewinsky was confronted at this hotel by ıvestigators and told there were tapes of her allegations against the President, she was offered leniency if she agreed to wear a wire and secretly tape conversations of others -- presumably, Vernon Jordan, Mr. Clinton's secretary and possibly the President himself. But a source says the talks fell apart before specific targets were mentioned.

Privately, administration officials are complaining that Starr plunged ahead with his investigation, even before winning Justice Department approval, and therefore, not everything he's collected would be admissible in a court of law.

Starr walked into a mob of reporters today to say otherwise.

KENNETH STARR, Independent Counsel: Any officer carrying out the activities of the federal government must be properly within his or her jurisdiction.

JACKIE JUDD: (voice-over) There were more developments today regarding this document, obtained by ABC News. Sources say that Lewinsky last week gave it to Linda Tripp. Tripp also had been subpoenaed by lawyers for Paula Jones, and this document contains talking points -- instructions for how to answer their questions.

About Lewinsky, it is suggested that Tripp say she found out Lewinsky left the White House because she was stalking the "P," the President, not because she was having an affair with him.

(on camera) It is not known who wrote the talking points. Prosecutors believe it id come from a lawyer obviously concerned about limiting damage to President .linton. Peter?

PETER JENNINGS: Thanks very much, Jackie Judd in Washington.

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LOAD-DATE: January 23, 1998

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January 29, 1998, Thursday, Final Edition

SECTION: A SECTION; Pg. A01

LENGTH: 1370 words

HEADLINE: Aide's Interest in President Was Known to Friends

BYLINE: Amy Goldstein; William Claiborne, Washington Post Staff Writers

BODY:

Monica Lewinsky's dream job, she once told a co-worker at the Pentagon, would be picking out the clothes President Clinton was to wear each day. When the president held fund-raisers in New York, friends remember Lewinsky bragging, she would spend hundreds of dollars on a ticket and air fare, then arrive hours early in hopes of winning a spot right against the rope line.

And months before she had been given a badge that allowed her into the White House's restricted West Wing, one friend said, she'd told him that she longed to have sex with the president on his Oval Office desk.

Whether or not she, in fact, had a sexual relationship with Clinton, Lewinsky's infatuation with the president was common knowledge among her friends nd some of her co-workers, both while she worked at the White House and later when she was sent to the Pentagon.

Those acquaintances paint an image of a young woman who spoke freely of her fantasies with a variety of older men in positions of influence, who read sexual meaning into the merest chance encounter. "She'd take little things and blow them up," said one former White House colleague, who described himself as a friend who regularly had lunch with Lewinsky.

Lewinsky herself admits that she wasn't always truthful.

"I have lied my entire life," Lewinsky told her friend and Pentagon colleague, Linda R. Tripp, in one of a series of conversations that Tripp secretly taped.

Lied sometimes, but not always. Which is why, in trying to conclude from such behavior and statements that Lewinsky simply fabricated an alleged 18-month relationship with Clinton, there is a stumbling block: Some of the sexual relationships that Lewinsky has boasted of, starting at an early age, actually took place.

Since she was a teenager, rumors have circulated among Lewinsky's friends about an affair she was said to have had with a former high school drama teacher. On Tuesday night, after dodging reporters for days, the teacher in question, Andy J. Bleiler, appeared with his wife and his lawyer on the lawn of his Portland, Ore., home to confess to a five-year relationship with his former student that ended last year.

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The Washington Post, January 29, 1998

Then, too, there was the relationship Lewinsky had with a high-ranking civilian official she met while working at the Pentagon.

Further complicating the conflicting images of Lewinsky's credibility is the fact that several of her friends -- including Bleiler -- have said in recent days that they often have dismissed her stories of sexual trysts as mere fiction. Bleiler and his wife, Kathy, whom Lewinsky also befriended, "would both describe Monica as having a pattern of twisting facts, especially to enhance her version of her own self-image," according to their lawyer, Terry Giles.

But at a news conference last night, Giles could not cite one that the Bleilers had not recounted to two investigators for independent counsel Kenneth W. Starr. "One doesn't pop out for me right at this moment. I'm sorry about that," he told reporters.

Given the ambiguities surrounding Lewinsky's credibility, the White House has been careful not to attack the 24-year-old woman's character or truthfulness. At a strategy session to begin formulating its defense of the alleged scandal, White House communications director Ann Lewis warned that, if anyone tried to discredit Lewinsky publicly, "I will kill you," according to participants at the meeting.

In recent days, the president's aides and friends have suggested only that Clinton had become friends with the young woman, in part because they had shared stories of their mutually troubled childhoods.

Indeed, the negative portrayal of Lewinsky's mind-set and her behavior has emerged in recent days almost entirely from her acquaintances -- and, in one instance, from the liberal arts college where, in 1995, she earned her bachelor's degree in psychology.

This week, officials of Lewis & Clark College in Portland said one of their employees had turned over to Starr a document that they said might have been forged by Lewinsky to try to help a friend.

Bleiler, the drama teacher, said he believed the letter, reportedly written to justify the continuation of someone's state unemployment benefits, had been prepared on his behalf. Giles, his lawyer, added that the letter was composed without Bleiler's knowledge.

After the Bleilers were interviewed for four hours by Starr's investigators yesterday, Giles said he had been told there is "a real likelihood they will be required to testify sometime in the future." Giles said no subpoenas were issued last night, and he described the interview as a "simple debriefing" in which the investigators took notes without a tape recorder and did not put the Bleilers under oath.

The attorney declined to discuss specifics of the interviews but said the Bleilers had turned over some documents that the couple said they had received from Lewinsky. He said they did not take any of the photographs she had mailed to his clients.

When asked if the information that the Bleilers gave to investigators was helpful or damaging to President Clinton, Giles said, "It would appear to me that Monica Lewinsky did, in fact, have a sexual encounter with someone in the

The Washington Post, January 29, 1998

White House at a fairly high level." But Giles said he also believes from last night's interview that Lewinsky is "someone obsessed with sex and fantasized before she went to Washington about sex with the president."

He asked a rhetorical question: Could the object of her sexual obsession be someone else? "I don't know the answer to that," Giles said.

The Bleilers stood behind their attorney during the news conference but made no substantive comments. Giles said that because they probably will be subpoenaed, they will not make any comments to the news media. "I want to keep their testimony as pure as possible," he said.

Responding to the suggestion that the news of the affair with Bleiler somehow discredits his client, Lewinsky's lawyer William H. Ginsburg said, "I challenge all parents to reflect on their children's personal lives between the age of 19 and 24. I suspect they'll find boyfriends and sexual relations in their lives."

But according to Lewinsky's friends and co-workers, the relationship with her former teacher has been just one element in what they describe as the young woman's active sexual life -- real or imagined.

And recently, much of that sexual energy focused on the president. She had a "besotted respect" for Clinton, recalled a colleague who knew her during her 18 months in the Pentagon's public affairs office after she'd left the White House. Invariably, the office's television was turned on during the president's speeches. And invariably, Lewinsky would demand that her co-workers be utterly silent.

She bragged to a reporter -- and to Pentagon colleagues -- that she had given Clinton the tie he wore to last year's State of the Union address. "It got to be a joke around the office," the Pentagon worker recalled.

Even earlier, during her White House intership in 1995, a co-worker said Lewinsky would "talk about how she wanted to have sex in the Oval Office, on the desk. She'd talk about [wanting to] go into his office at night."

Several former co-workers recalled that Lewinsky attended a number of presidential events, sometimes leaving her desk during the workday to appear uninvited at a White House ceremony. That behavior did not go unnoticed by White House officials, who eventually decided to recommend her for a Pentagon job, sources have said.

But the president was not the only object of her attention. "She'd talk about the vice president, and how sexy he was," said the former White House colleague. And one day at the end of 1995, she returned to her White House office from a trip to Starbucks, brimming with excitement that she had run into then-presidential adviser George Stephanopoulos.

"She said, 'He looked into my eyes and there was really a connection,' " the friend recalled. "And she said, 'You know the greatest thing about it? I wasn't wearing my bra.' "

Staff writers David Maraniss and Dana Priest contributed to this report. Claiborne reported from Portland.

The Washington Post, January 29, 1998

GRAPHIC: Photo, afp; Photo, lucian perkins; Photo, ap/tyler mallory;ph,,ap/don ryan, Clinton, Monica Lewinsky talk at 1996 event. President Clinton greets a group that included Monica Lewinsky, left center, at White House event in November 1996. Andy J. Bleiler speaks with reporters outside his home in Portland, Ore. The former drama instructor alleges that he had a five-year affair with Monica Lewinsky that ended last year. William H. Ginsburg, attorney for Monica Lewinsky, departs the Cosmo Club in Washington. He says news of her alleged affair with Bleiler should not discredit his client. Andy J. Bleiler, above, who says he once had an extramarital affair with Monica S. Lewinsky, is besieged as he leaves his home in Portland, Ore. At left, Lewinsky's attorney, William H. Ginsburg, leaves the Cosmos Club in Washington. He says news of the alleged Bleiler-Lewinsky affair should not discredit his client.

LANGUAGE: ENGLISH

LOAD-DATE: January 29, 1998

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1ST STORY of Level 1 printed in FULL format.

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The Washington Times

February 2, 1998, Monday, Final Edition

SECTION: Part A; COMMENTARY; OP-ED; Pg. A17

LENGTH: 701 words

HEADLINE: Changing times, changing standards

BYLINE: Suzanne Fields; THE WASHINGTON TIMES

BODY:

Thomas Jefferson may have done it. Andrew Jackson was accused of doing it. We know that Grover Cleveland and Warren Harding did it. FDR did it with maybe only one woman. Jack Kennedy did it with most of the women on the Atlantic seaboard.

What these men have in common - very common, you might say -is that they bedded women not their wives.

Thomas Jefferson was a widower who promised his dying wife that he would not marry again. Andrew Jackson married Rachel Robards, who had been married before. When it turned out that the divorce, a rarity at the time, was tainted, they were accused of living in sin, which was not as chic then as now. Jackson rried her again, but she died before she reached the White House, with cries of scorn ringing in her ears.

Grover Cleveland sired an illegitimate child before he ran for the presidency, but mothers nevertheless pushed their daughters at the bachelor president. He eventually married a very young woman who turned out to be a great asset as first lady.

Florence Harding visited Madam Marcia, a celebrated astrologer in Washington, who told her that her husband would become president and would conduct affairs - both of state and of boudoir - in office. Madam Marcia was right on both counts. The senator was even then carrying on with two women.

Eleanor Roosevelt was shocked to learn that FDR had a long relationship with Lucy Mercer Rutherford, and perhaps most hurtful of all, his mistress and not his wife was at his bedside when he died on a Georgia holiday.

The dark side of Camelot is well documented. Jack Kennedy's adultery (with, among others, the doxy of a mafia don), was shielded by adoring reporters, and might very well have put the nation at danger had he lived.

Does that mean we should excuse Bill Clinton's billy-goat behavior because he's in good historical company? If the allegations of Paula Jones and Monica Lewinsky are true, there's a major difference in the romps of Mr. Clinton and the bedtime adventures of his predecessors. Mr. Clinton arrived when all the rules had been changed.

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The Washington Times, February 2, 1998

It is a postmodern fact of life that the media sees almost nothing off-limits since a cameraman photographed Gary Hart aboard the loveboat "Monkey Business." Bill Clinton, who is regarded by feminists as the Big Daddy who delivered all sorts of policy goodies, nevertheless shows himself to be an insensitive clod in the boudoir, or what may pass for a boudoir. Miss Lewinsky is said to have joked to a friend in Portland that she was on her way to the Oval Office to "put on my presidential kneepads."

This president's judgment of women does not serve him or the country well. None of the vulnerable ladies attached to previous presidents were afflicted with the kiss-and-tell disease. Many voters, like Hillary herself, may have forgiven the president for Gennifer Flowers, but as Gennifer put it when she heard about Monica: "You think the boy would learn."

White House staffers have been warned against making exaggerated attacks on the character and veracity of "that woman." Both the White House and Vernon Jordan recommended her for jobs. That's why the first lady, who can be forgiven for not wanting to invite Monica back to the White House for tea, blames instead "the vast right wing conspiracy." (Jerry Falwell made him do it.)

Hillary follows precedent, too. When Grover Cleveland, a Democrat, ran for re-election against Benjamin Harrison, the Republicans spread rumors that the president often got drunk and beat his wife. Frances Cleveland composed a public letter emphasizing her personal contentment: "I can wish the women of our country no greater blessing than that their homes and lives may be as happy, and their husbands may be as kind, attentive, considerate and affectionate as mine." Cleveland lost anyway.

But Mrs. Cleveland is remembered for something far more important on behalf of all women. She got rid of a ludicrous feminine fashion known as the bustle, wearing a dress without one. That's what you call petticoat power.

Suzanne Fields, a columnist for The Washington Times, is nationally syndicated. Her column appears here Monday and Thursday.

LANGUAGE: ENGLISH

LOAD-DATE: February 2, 1998

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1ST STORY of Level 1 printed in FULL format.

Copyright 1998 News World Communications, Inc.
The Washington Times

July 29, 1998, Wednesday, Final Edition

SECTION: Part A; Pg. A12

LENGTH: 473 words

HEADLINE: McCurry shrugs off deal's import;
Other aides tense about Lewinsky

BYLINE: Paul Bedard; THE WASHINGTON TIMES

BODY:

The White House yesterday greeted the immunity deal cut by Monica Lewinsky with tension or resignation that the affair - and the credibility of the president - is finally headed for a court test.

Press Secretary Michael McCurry brushed aside queries about her agreement with independent counsel Kenneth W. Starr with humor and nonchalance, while others questioned the meaning of the deal for their boss and Mr. Starr's investigation.

"Starr's the toughest prosecutor anyone ever faced," fretted one administration official.

"It's tense, to say the least," added another.

But most aides rejected characterizations that they felt besieged or that the president was despondent because of the latest change in the 6-month-old Lewinsky scandal.

"Do I look under siege? This is her deal, not ours," said one aide.

"People are kind of inured to this, we're used to this. It's a roller coaster over here. Everyone assumed that this was going to happen just like everyone assumes that Starr will deliver a report [on the Whitewater-Lewinsky affair] to Congress," said an administration official.

"I don't feel under siege today," said Mr. McCurry.

Many junior Clinton aides looked to Mr. McCurry to set the mood at the White House. He broke from his recent practice of aggressively challenging reporters, instead employing easy banter and offering at the start of his daily briefing that the president was happy for Miss Lewinsky.

"I think that he's pleased that things are working out for her," he said.

"I don't know that he sees it as a good, bad or indifferent development, he's just pleased that things are working out for her," said Mr. McCurry.

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The Washington Times, July 29, 1998

He also laid down the rule for aides not to discredit Miss Lewinsky, a move that would have appeared spiteful.

"She's a pleasant person. In the encounters I had with her, she was. We even, I think, interviewed her for a job here at one point," revealed Mr. McCurry, adding that the press office manager's position went to Elizabeth Newman instead.

In a joking manner, he said: "Is there anyone here who would want to dispute the notion that we're happier that Ms. Newman is here? It might make your job a little easier on days. I know I'm certainly happy with that."

Among the concerns raised by the immunity deal was the realization that the scandal will continue into the fall and may hurt the chances of Democratic candidates.

Another concern heard in the White House yesterday is that Miss Lewinsky's grand jury testimony might hurt the president's credibility. He has repeatedly denied having sex with her or telling her to lie about the affair, charges Mr. Starr is investigating.

Mr. McCurry said he continues to believe the president. Asked if the president was telling the truth, the spokesman said, "I believe so, yes."

LANGUAGE: ENGLISH

LOAD-DATE: July 29, 1998

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1ST STORY of Level 1 printed in FULL format.

Copyright 1998 Times Mirror Company
Los Angeles Times

August 8, 1998, Saturday, Home Edition

SECTION: Part A; Page 8; National Desk

LENGTH: 980 words

HEADLINE: LEWINSKY IS UNIQUE AMONG WOMEN LINKED TO CLINTON;
STRATEGY: UNLIKE JONES, FLOWERS AND WILLEY, EX-INTERN HAS NOT BEEN AND WILL NOT BE ATTACKED, CLINTON AIDES SAY. WHY? FOR ONE, SHE POSES A THREAT.

BYLINE: ELIZABETH SHOGREN, TIMES STAFF WRITER

DATELINE: WASHINGTON

BODY:

For years, whenever a woman surfaced with a story that threatened the boss, the Clinton team had the same response: Assume attack mode and assail her credibility.

Gennifer Flowers, the cabaret singer who sold her story of a long affair with Gov. Clinton to a supermarket tabloid, had traded "tabloid trash for cash."

Paula Corbin Jones, the former Arkansas state employee who charged sexual harassment, was said to be doing the bidding of the president's conservative enemies.

And Kathleen E. Willey, the White House volunteer who alleged that the president groped her, was described as a misguided soul hoping to solve her money troubles with a book deal.

Dealing with allegations of Clinton's sexual misconduct had been such an important part of the 1992 campaign that a senior aide, Betsey Wright, oversaw an operation to handle what she called "bimbo eruptions."

But Monica S. Lewinsky, the former White House intern who testified under oath before the grand jury this week about her alleged affair with the president, was always different. From the beginning, the White House has been careful about what it has said of Lewinsky.

The week the Lewinsky story broke in January, Clinton's Press Secretary Mike McCurry signaled the tone the White House would take by deflecting questions about whether the then 24-year-old intern was "less than stable."

"I can't imagine anyone in a responsible position at the White House would be making such an assertion. I have heard some expressions of sympathy for what, clearly, someone who's a young person would be going through at a moment like this," he said.

And McCurry quickly signaled that the marching orders had not changed once Lewinsky made a deal with independent counsel Kenneth W. Starr for immunity

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Los Angeles Times August 8, 1998, Saturday,

from prosecution. McCurry described the president as feeling "pleased that things are working out for her."

In abandoning their usual modus operandi, White House aides said that they are taking their cue from Clinton. "Nobody is allowed to say anything critical of her because it does not reflect his view," said Rahm Emanuel, senior advisor for policy and strategy.

The legal peril Lewinsky poses to the president is one factor in the kid gloves treatment, some Clinton advisors said. "I think anybody who tried to impugn her from the White House should be shot at sunrise. She could do a lot of damage," said one former White House official who has advised the president informally in recent months.

White House officials and Clinton allies have gone out of their way to nurture whatever positive feelings Lewinsky had about the president. They did not want her to feel betrayed or pushed into providing Starr with evidence that might prove the most damaging claim against the president--obstruction of justice.

"I think she likes the president and does not want to hurt him," one former official said. "She has caused damage , inadvertently, because she talked to so many people. But she is probably mortified that she got herself and the president into this pickle."

White House officials who had served as the president's attack dogs in the past, said it was not difficult to decide to treat Lewinsky differently.

"I have a simple calculus," said one senior White House official, who spoke on condition that he not be named. "All the other people--some of whom we've attacked for their motives--were people who chose to get involved in this for financial gain or political reasons. I don't have any evidence that this person Lewinsky chose to be involved."

Lewinsky's youth, and the fact that she had worked at the White House and was known and liked by many in the administration, also has been a factor in her treatment. But, for many, the most persuasive indicator was the attitude of their chief.

"We're connected to him," said one official. "We're on Team Clinton, and he's the head of it."

That was not the case with other women who have talked about alleged sexual encounters--wanted or otherwise--with Clinton.

When former White House volunteer Willey appeared on "60 Minutes" in March to talk about being groped by the president in the White House, aides quickly raised questions about her credibility. They produced a pile of correspondence in which Willey lavished compliments on the president.

With Willey, the White House was following a well-worn strategy, first used in the 1992 campaign.

Flowers rocked Clinton's candidacy by telling a national television audience that she had been Clinton's mistress for 12 years. Clinton supporters still

question her motives, even though Clinton has since admitted to a single sexual encounter with her.

"She made half a million dollars from accusations about Bill Clinton," said one senior White House official who also worked on the 1992 campaign. "Her motives were highly suspect."

Jones--who claimed that Clinton invited her to an Arkansas hotel room, dropped his pants and propositioned her--filed a lawsuit that led to Clinton's admission of an encounter with Flowers. But, White House aides maintained, Jones was sponsored from the beginning by Cliff Jackson, a right-wing Clinton hater from Arkansas. Thus they felt free to assail her as politically motivated, the official said.

Talking about Jones and others like her, James Carville, Clinton's 1992 campaign strategist and longtime friend and advisor, said: "Look, you can drag $ 100 bills through trailer parks and there is no telling what you will find."

No matter what happens in coming days, the Clinton advisors said, Lewinsky does not have to worry that she will become a target of similar comments.

"No fair-minded person can say that she is politically motivated like Paula Jones or financially motivated like Gennifer Flowers," a current White House official said. "Therefore it would be wrong morally and strategically to attack her."

GRAPHIC: PHOTO: "I think anybody who tried to impugn her from the White House should be shot at sunrise," an ex-Clinton aide said of Lewinsky. PHOTOGRAPHER: euters

LANGUAGE: English

LOAD-DATE: August 8, 1998

DISTRICT OF COLUMBIA
AFFIDAVIT OF CHRISTOPHER HITCHENS

I, Christopher Hitchens, do hereby state on oath as follows:

1. I am 49 years of age and reside in the District of Columbia and am competent to execute this affidavit.

2. I am a resident alien, and am a citizen of the European Union and the United Kingdom.

3. I have been a journalist for 26 years.

4. I am self employed and contribute articles to Vanity Fair and The Nation.

5. Sydney Blumenthal and I are social friends and journalistic acquaintances.

6. On March 19, 1998, Sidney Blumenthal, Carol Blue, and I met for lunch at the Occidental restaurant in Washington, D.C.

7. If called to testify, I would testify on personal knowledge to the following facts.

8. During lunch on March 19, 1998, in the presence of myself and Carol Blue, Mr. Blumenthal stated that, Monica Lewinsky had been a "stalker" and that the President was "the victim" of a predatory and unstable sexually demanding young woman. Referring to Ms. Lewinsky, Mr. Blumenthal used the word "stalker" several times. Mr. Blumenthal advised us that this version of the facts was not generally understood.

9. Also during that lunch, Mr. Blumenthal stated that Kathleen Willey's poll numbers were high but would fall and would not look so good in a few days.

10. I have knowledge that Mr. Blumenthal recounted to other people in the journalistic community the same story about Monica Lewinsky that he told to me and Carol Blue.

FURTHER AFFIANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this fifth day of February, 1999.

Christopher Hitchens

5.ii.99

County of San Mateo
State of California

AFFIDAVIT OF CAROL BLUE

I, Carol Blue, do hereby state on oath as follows:

1 I am over 18 years of age, reside in the District of Columbia and am competent to execute this affidavit.

2. I am a citizen of the United States.

3. I am currently self-employed as a writer.

4. Sidney Blumenthal and I are social friends.

5. On or about March 19, 1998, Sidney Blumenthal, Christopher Hitchens, and I met for lunch at the Occidental restaurant in Washington, D.C.

6. If called to testify, I would testify on personal knowledge to the following facts in addition to those set forth in the affidavit of Christopher Hitchens executed on February 5, 1999.

7. During that lunch, in the presence of myself and Christopher Hitchens, Mr. Blumenthal stated that the President told him that he (the President) was the "victim" of Monica Lewinsky's sexual advances and that she was a "stalker, " and was "crazy." Mr. Blumenthal used the word "stalker" several times to describe Ms. Lewinsky. Mr. Blumenthal conveyed his conviction that the President's version of the events were true.

8. Also during that lunch, Mr. Blumenthal stated that Monica Lewinsky's poll numbers were very low and that Kathleen Willey's poll numbers were very high, but that would change by Friday, and Ms. Willey's "numbers" would fall.

FURTHER AFFIANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this seventh day of February, 1999.

Carol Blue

DISTRICT OF COLUMBIA

Affidavit of R. Scott Armstrong

I, R. Scott Armstrong, do hereby state on oath as follows:

1. I am 53 years of age and reside in the District of Columbia and am competent to execute this affidavit.

2. I am a citizen of the United States.

3. I am currently an author and journalist. I have been so engaged for approximately the past 24 years and was formerly affiliated with various news organizations including The Washington Post. I also served as Senior Investigator to the Senate Select Committee on Presidential Campaign Activities involving the so called Senate Watergate Committee.

4. I am socially and professionally acquainted with Sidney Blumenthal, Christopher Hitchens and Carol Blue.

5. On or about March 18, 1998, I was on a panel discussion at the National Press Club with Christopher Hitchens among others concerning national security reporting.

6. Following that panel discussion, I met with Christopher Hitchens and Carol Blue at which time they recounted to me a conversations they had had with Sidney Blumenthal in which Mr. Blumenthal had related to them among other things that Monica Lewinsky was a "stalker"

FURTHER AFFIANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this eighth day of February 1999.

R. Scott Armstrong