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

U.S. GOVERNMENT PRINTING OFFICE

WASHINGTON : 2000
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

1The 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
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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.

/\n
GARY SISCO,
Secretary of the Senate.
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614, 105th Cong., which provided for the appointment of managers and procedures relating to impeachment proceedings [id. at H12042–43].


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. 3098 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, 3099, 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 25, 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 Defendant Monica S. Lewinsky:

JACOB A. STEIN, ESQ.
Stein, Mitchell & Mazines
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 FRANERI, ESQ.
Deputy Legal Counsel
Senate Legal Counsel
642 Hart Office Building
Washington, D.C. 20510

House of Representatives Counsel Present:

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

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CATHY JARDIN, RPR
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WITNESS

Monica S. Lewinsky

EXAMINATION BY COUNSEL

By Mr. Bryant

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EXHIBITS

WHITE HOUSE EXHIBITS:

No. 1

MARKED

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

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

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

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

By unanimous consent of the Senate, the Majority Leader and the Democratic Leader were authorized, acting jointly, to determine the time and place for the taking of the depositions authorized by Senate Resolution 30. The
Leaders, through Senate Legal Counsel, have conferred with counsel for Ms. Lewinsky, the House Managers, and the President's counsel, and have determined, acting jointly, that Ms. Lewinsky's deposition should take place on this date, Monday, February 1st, 1999, in the Mayflower Renaissance Hotel, here in Washington D.C., beginning at 9:00 a.m.

By unanimous consent of the Senate, the time allotted for examination of Ms. Lewinsky by the parties shall not exceed 8 hours. Each side may examine Ms. Lewinsky for up to 4 hours. Time consumed by objections shall not be charged to the questioning period. Senate Legal Counsel will advise the presiding officers of the time spent in questioning by the parties. Senator Leahy and I anticipate that a 5-minute break will be taken approximately every hour, and that the deposition will recess for one hour for lunch at approximately 1:00 p.m.

Ms. Lewinsky, as I indicated to you a few minutes ago, any time that you wish to take a break, just let us know--

MS. LEWINSKY: Thank you.

SENATOR DeWINE: --and we'll certainly do that.

At any point if the reporter or videographer needs a pause in the proceedings for technical reasons, please make that known to us so that we can accommodate you as
well.

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

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

Section 208 of Senate Resolution 30 requires that these depositions be conducted in private. Attendance at
this deposition is limited to the witness, Ms. Lewinsky, her
counsel, the House Managers and counsel, counsel for the
President, the Presiding Officer Senators, Senate Legal
Counsel and Deputy Senate Legal Counsel, Senate personnel
whose presence is required as determined by the Majority
Leader and the Democratic Leader, and those persons whose
attendance is required to make and preserve a record of the
proceedings.

Now, I think we should note that according to the
terms of Section 205, quote, "All present must maintain the
confidentiality of the proceedings," end of quote. Now, for
Senators and Senate employees, they should be aware that
this deposition is a, quote, "confidential proceeding of the
Senate," end of quote, under Senate Rule 29.5. This
deposition may be discussed only with Members of the Senate
and staff designated by Members. House Managers and House
employees may only discuss this deposition with fellow
Managers and staff designated by the Managers. The
President’s counsel may only discuss this deposition with
the President and counsel and staff representing the
President in this matter. Ms. Lewinsky and her counsel may
only discuss this deposition with each other.

This injunction remains and will remain in effect
unless ordered otherwise by the United States Senate.
Moreover, any record of this deposition made available must
similarly be kept confidential until further order of the
United States Senate. All persons are admonished to conduct
themselves accordingly.

A videotaped record and transcription of this
deposition is being made and will be made available for the
review by Members of the Senate and for review by one
designated staff member per Senator, by the Chief Justice of
the United States, the House Managers, the President’s
counsel, and the witness’ counsel for their review in
connection with the impeachment proceedings.

As I mentioned earlier, I am joined today as
Presiding Officer of this deposition by Senator Patrick
Leahy.

Senator Leahy, do you have anything that you would
like to add at this point? And I will pass the microphone
to you.

SENATOR LEAHY: Thank you, Senator DeWine.

This may seem awfully formal going through all of
these things, Ms. Lewinsky, but Senator DeWine will be
swearing you in, in just a minute or so, and I just wanted
to emphasize that you are aware of the fact this is being
taken under Senate Resolution 30 and it is in the Senate
Trial of the Articles of Impeachment against President
Clinton.

And we will be--Senator DeWine and I will be the
Presiding Officers on this. Senator Dodd and Edwards are here in the room now and will probably be moving into my seat at some point.

When Senator DeWine administers the oath that's prescribed by Senate Rules, you will be asked to swear or affirm that your testimony will be truthful. In that connection, I wish to advise you that should a witness fail to testify truthfully, that witness could violate a criminal law that prohibits false material statements to Congress, which I am sure you understand. And if you have any questions about this, of course, you should feel free to consult with your attorneys that I note for the record are here with you. And you should be given an opportunity to review the transcript of your testimony here today and to make any clarifications, corrections, or changes you feel necessary once you see it.

Now, the time frame set by the Senate resolution is such that your opportunity may be limited to 48 hours, and I'd mention that also for your counsel's sake, and I would hope that we would have the transcript available to you and your counsel by tomorrow morning.

We are doing this deposition—oh, and also I understand that the House Managers would provide any exhibits 18 hours in advance, under our rules, with the exception of press accounts.
And we're conducting this in private, Senator DeWine has indicated the other people in this room are being instructed they are to keep this matter confidential until and unless the Senate decides whether it be admitted as evidence in the impeachment trial. And while I want—I always hate to suggest things to our colleagues in the other body. Under these rules, that rule applies also to the House Managers—I'd just note that for the record—and to the President's counsel.

The Senate Sergeant-at-Arms is authorized to make the transcript and videotape available. The Sergeant-at-Arms is here. And in accordance with the provisions that govern these proceedings, the House Managers or the President's counsel may later this week ask the Senate to admit into evidence in the impeachment trial the transcript of this deposition, the videotape of it, or some portions of it. The Senate then has to vote and decide whether that would be allowed or not and determine in which way it may become public, but if the Senate were to vote for any part or all of the deposition to become public, Ms. Lewinsky, it would.

And the House Managers or the President's counsel may also ask that you be subpoenaed by the Senate to present live testimony before the Senate. That would happen only if the Senate voted to do that. I want to make sure you
I understand that.

I have a feeling all of these things I'm telling you have already been explained to you, but you understand we want to make clear on the record.

And you should feel at any time that you can consult with your attorneys during this. Senator DeWine has already said that if you were to ask for such a break, we would agree to it. And if there is going to be a break, if we are going to go off the record, then it would be on--it would be on the ruling of either Senator DeWine or I. So if you need to take a break, feel--feel free to let either one of us know that, or whoever might be sitting here presiding, if we are replaced at any time by anybody.

I think that covers just about everything.

MS. LEWINSKY: Thank you.

SENATOR LEAHY: I have no other questions.

Oh, I'm sorry.

MR. STEIN: Senators DeWine and Leahy, I'd like to make a statement, a very short one.

My name is Jake Stein. I'm with Plato Cacheris and Sydney Hoffmann and Preston Burton. We represent Ms. Lewinsky.

Ms. Lewinsky is here today pursuant to a subpoena issued by the Senate of the United States. The Independent Counsel entered into a transactional immunity agreement with
Ms. Lewinsky on July 28th, 1998. Under the terms of the agreement, Ms. Lewinsky agreed to cooperate with a request of the Independent Counsel concerning testimony, including testimony before Congress.

The Independent Counsel has requested that Ms. Lewinsky testify at this deposition, and the Independent Counsel has stated that this testimony is within the transactional immunity agreement of July 28th in connection with the aforesaid matter. Moreover, by letter dated January 29th, 1999, Representative Henry Hyde affirmed that Ms. Lewinsky’s immunity agreement extended to her testimony in the impeachment trial.

We assume that the questions to be posed to Ms. Lewinsky today will not exceed the jurisdictional mandate of the Independent Counsel, and we will object to questions outside the scope of the mandate. We have been advised by the House Managers and Senate counsel that no questions pertaining to sexual matters will be asked.

On behalf of Ms. Lewinsky, we do object to the use of videotape to record this deposition, and we object to any dissemination of the videotape beyond the United States Senate. With respect to testimony, prefatorily, Ms. Lewinsky adopts the testimony she gave under oath on August 6th, August 20th, and August 26th, 1998.

Thank you.
SENATOR DeWINE: Thank you very much. The objection will be—of course, be noted.

At this point, for the record, I would like to go around the table and have everyone introduce themselves for the record, and we'll start with the White House counsel and if we could just do it maybe in order.

MS. SELIGMAN: Nicole Seligman on behalf of the President.

MS. MILLS: Cheryl Mills on behalf of the President.

SENATOR DeWINE: And again, for the— for Ms. Lewinsky, if you all could introduce yourselves for the record, please?

MR. STEIN: My name is Jake Stein.

MR. CACHERIS: Plato Cacheris.

MS. HOFFMANN: Sydney Hoffmann.

MR. BURTON: Preston Burton.

SENATOR DeWINE: And if the House Managers could introduce themselves for the record?

MR. BRYANT: I'm Ed Bryant.

MR. SCHIPPERS: Tom Schippers.

MR. PINKOS: Steve Pinkos.

MR. ROGAN: Jim Rogan.

SENATOR DeWINE: The record should also reflect, as Senator Leahy has indicated, that in the room are
Senators Christopher Dodd and Senator John Edwards. We anticipate that later in the morning we will be joined by Senators Arlen Specter, as well as Senator Fred Thompson.

The Senators have all been appointed Presiding Officers by the Majority Leader and by the Democratic Leader.

The videographers today are Thomas Glender and Gregory Smith, employed by Video Age of Washington, D.C.

The court reporters today are Cathy Jardim and Christopher Hitsko of Miller Reporting Service.

Now, if there are no further questions or statements from the parties or from the counsel for the witness, I will now swear—I'm sorry?

MS. SELIGMAN: I do have one objection that I'd like to make before we begin.

I must object to the exhibits with which we were served yesterday afternoon. Senate Resolution 30 required the House Managers to provide, and I quote, "copies of all exhibits in which the deposing party intends to enter into the deposition." I'd like to mark for the record a copy of what we did receive.

We were provided with a list of the 66 exhibits yesterday afternoon, but were given copies of only 6 of them. The list includes such general references as draft letter to President Clinton, of which there are many in the
record, and testimony of Sidney Blumenthal, 6/4 in '98, two
pages, without a reference to which pages are intended.
What we received plainly is not in compliance with
the resolution. We therefore request that the Managers
immediately provide us and the witness with copies of the
exhibits they intend to use, as required by the resolution.
We also request that the Presiding Officers ask the Managers
to provide copies of the exhibits they intend to use in
future depositions, in compliance with the resolution.

SENATOR DeWINE: The resolution states as follows:
The party taking a deposition shall present to the other
party at least 18 hours in advance of the deposition copies
of all exhibits which the deposing party intends to enter
into the deposition.

Will the--would you like to respond?

MR. BRYANT: Yes, I'd be happy to. It was our
understanding that we had fully complied with that
provision, in that we sent along the record, the complete
record that contains the majority of the exhibits that we
intend to use.

The ones that are not in the record were attached,
physically attached, but I think we actually sent along
copies--sent along copies of the record, too. They already
had that in their possession.

SENATOR DeWINE: Okay, I'm not clear I understand.
MR. BRYANT: Well, the exhibits mentioned are in
the bound copy, the volumes of the communications that the
Independent Counsel provided us. They're in the record
already, and we've sent them--rather than copy individually
those 66 items or 60-something items that we didn't attach,
rather than copy these out of the books, we just sent the
books over, knowing that counsel could locate those
particular exhibits, as necessary.

SENATOR DeWINE: And those were referenced how?

MR. BRYANT: They're referenced on the exhibit
list.

SENATOR LEAHY: I wonder if I might ask, if you
were--

MR. BRYANT: Senator, we--I understand we've got
copies also we can now hand out.

SENATOR DeWINE: Okay. You're prepared to--

MR. BRYANT: Yes.

SENATOR DeWINE: --hand them copies, right?

MR. BRYANT: Yes.

SENATOR DeWINE: Hand them over.

SENATOR LEAHY: I think you should. I would think
that something saying a draft letter might be a little bit
broad even though there might be--it might be contained
somewhere in the record, but to be specific where it is, and
I would note that I would hope that all who are going to
be--on whatever side they’re on, the White House side, the House side—would be more specific than that. I—it would also help if there were actual copies. That way, the Presiding Officers would have them, too, and we’d know specifically what it is.

SENATOR DeWINE: We have been provided with this document, which I assume is the same document that you provided.

MR. BRYANT: That’s correct.

SENATOR DeWINE: Okay, and I--Pat, do you want to mark this? Should we mark this one separately, if it’s not already been marked?

SENATOR LEAHY: Has this been marked?

MS. SELIGMAN: I just handed one to the court reporter.

SENATOR LEAHY: Oh, you have, okay, to the court reporter.

SENATOR DeWINE: So that document is the document that you forwarded to the White House counsel.

MR. BRYANT: That’s correct.

SENATOR DeWINE: So that will be marked as an exhibit.

[White House Exhibit No. 1 marked for identification.]

SENATOR DeWINE: You have now turned over the
documents to White House counsel, is that right?

MR. SCHIFFERS: We're in the process.

SENATOR DeWINE: You are in the process of doing that.

MR. SCHIFFERS: We're in the process.

SENATOR DeWINE: All right. Why don't we go off the record for just a moment until that's completed?

THE VIDEOGRAPHER: We are going off the record at 9:21 a.m.

(Discussion off the record.)

THE VIDEOGRAPHER: We are going back on the record at 9:24 a.m.

SENATOR DeWINE: We are now back on the record.

The House Managers have informed us that all the exhibits that they have referenced and that they intend to use are in the Senate record. They also, during this break, have turned over copies of these exhibits that they intend—or that they made a reference during this deposition. They have turned those over to the White House counsel.

SENATOR LEAHY: And I might note that it would be very—-are you picking this up?

THE VIDEOGRAPHER: Yes.

SENATOR LEAHY: I might note that it would be very helpful—and I think the Presiders will be this way, no
matter who is presiding—that if there are exhibits that
counsel—and whichever counsel are going to be using it, the
exhibits, White House counsel, the House Managers, whomever,
really work in getting them complete to the—to the other
side. Otherwise, we’re going to be delayed like this
unnecessarily.

SENATOR DeWINE: Are there any other questions
from the parties or counsel at this time?
[No response.]

SENATOR DeWINE: If not, I will now swear the
witness.

Ms. Lewinsky, will you raise your right hand,
please?

Whereupon,

MONICA S. LEWINSKY

was called as a witness and, after having been first duly
sworn by Senator DeWine, was examined and testified as
follows:

SENATOR DeWINE: The House Managers may now begin
your questioning.

MR. BRYANT: Thank you, Senator.
Good morning to all present.

EXAMINATION BY HOUSE MANAGERS

BY MR. BRYANT:

Q Ms. Lewinsky, welcome back to Washington, and
wanted to just gather a few of our friends here to have this deposition now. We do have quite a number of people present, but we—in spite of the numbers, we do want you to feel as comfortable as possible because I think we--everyone present today has an interest in getting to the truth of this matter, and so as best as you can, we would appreciate your answers in a—in a truthful and a fashion that you can recall. I know it's been a long time since some of these events have occurred.

But for the record, would you state your name once again, your full name?

A Yes. Monica Samille Lewinsky.

Q And you're a—are you a resident of California?

A I'm—I'm not sure exactly where I'm a resident now, but I—that's where I'm living right now.

Q Okay. You—did you grow up there in California?

A Yes.

Q I'm not going to go into all that, but I thought just a little bit of background here.

You went to college where?

A Lewis and Clark, in Portland, Oregon.

Q And you majored in—majored in?

A Psychology.

Q Tell me about your work history, briefly, from the time you left college until, let's say, you started as an
intern at the White House.

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

Q  Okay. Did you--

A  I graduated college in May of '95.

Q  Did you work part time there in--in Oregon with a--with a District Attorney--

A  Uh--

Q  --in his office somewhere?

A  During--I had an internship or a practicum when I was in school. I had two practicums, and one was at the public defender's office and the other was at the Southeast Mental Health Network.

Q  And those were in Portland?

A  Yes.

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

A  Correct.

Q  Okay. As a part of your duties at the Southeast Health Network, what did you--what did you do in terms of working? Did you have direct contact with people there, patients?

A  Yes, I did. Um, they referred to them as clients there and I worked in what was called the Phoenix Club, which was a socialization area for the clients to--really to just hang out and, um, sort of work on their social skills.
So I--

Q  Okay. After your work there, you obviously had occasion to come to work at the White House. How did--how did you come to decide you wanted to come to Washington, and in particular work at the White House?

A  There were a few different factors. My mom's side of the family had moved to Washington during my senior year of college and I wanted--I wasn't ready to go to graduate school yet. So I wanted to get out of Portland, and a friend of our family's had a grandson who had had an internship at the White House and had thought it might be something I'd enjoy doing.

Q  Had you ever worked around--in politics and campaigns or been very active?

A  No.

Q  You had to go through the normal application process of submitting a written application, references, and so forth to--to the White House?

A  Yes.

Q  Did you do that while you were still in Oregon, or were you already in D.C.?

A  No. The application process was while I was a senior in college in Oregon.

Q  Had you ever been to Washington before?

A  Yes.
Q Obviously, you were accepted, and you started work when?
Q Where—where were you assigned?
A The Chief—
Q Physically, where were you located?
A Oh, physically?
Q Yes.
A Room 93 of the Old Executive Office Building.
Q Were you designated in any particular manner in terms of—were all interns the same, I guess would be my question?
A Yes and no. We were all interns, but there were a select group of interns who had blue passes who worked in the White House proper, and most of us worked in the Old Executive Office Building with a pink intern pass.
Q Now, can you explain to me the significance of a pink pass versus a blue pass?
A Sure.
Q Okay. Is it—is it access?
A Yes.
Q To what?
A A blue pass gives you access to anywhere in the White House and a pink intern pass gives you access to the Old Executive Office Building.
Q  Did interns have blue passes?
A  Yes, some.
Q  Some did, and some had pink passes?
A  Correct.
Q  And you had the pink?
A  Correct.
Q  How long was your internship?
A  It was from July 'til the end of August, and then I stayed on for a little while until the 2nd.
Q  Are most interns for the summertime—you do part of the summer or the entire summer?
A  I believe there are interns all year-round at the White House.
Q  Now, you as an intern, you are unpaid.
A  Correct.
Q  And tell—tell me how you came to, uh, through your decisionmaking process, to seek a paid position and stay in Washington.
A  Uh, there were several factors. One is I came to enjoy being at the White House, and I found it to be interesting. I was studying to take the GREs, the entrance exam for graduate school, and needed to get a job. So I—since I had enjoyed my internship, my supervisor at the time, Tracy Beckett, helped me try and secure a position.
Q  Now, you mentioned the pink pass that you had. So
you were able to—I don’t want to presume—you were able to
get into the White House on occasion even with a pink pass?
A  The—do you mean the White House proper, or—
Q  Yes, the White House—
A  --the complex?
Q  Yes. Let me be clear. When I—I tend to say
"White House"—I mean the actual building itself. And I
know perhaps you think of the whole complex in terms of the
whole—
A  I’m sorry. Just to be clear—
Q  Yes.
A  --do you mean the West Wing and the residence and—
Q  Right.
A  --the East Wing when you say the White House?
Q  Right. The White House where the President lives,
and works, I guess, right.
A  I’m sorry. Can you repeat the question?
Q  Yes, yes. I mean that White House. As an intern,
you had a pink pass that did allow you to have access to
that White House where the President was on occasion?
A  No.
Q  Did not. Did you have—did you ever get in there
as an intern?
A  Yes.
Q. And under—under what circumstances?
A. It--
Q. Did you have to be accompanied by someone, or--
A. Exactly; someone with a blue pass.
Q. So how did you—once you decided you wanted to
stay in Washington and find a paying job, you sought out
some help from friends there, people you knew, contacts, and
you were—you did—you were successful?
A. Correct.
Q. And you were hired where—where in the White
House?
A. In Legislative Affairs.
Q. Now, again, to educate me on this, in that group,
in that section, department, you would have worked where,
physically?
A. Physically, in the East Wing.
Q. Okay, and as an intern before, you worked in the
Old Executive Office Building?
A. Correct.
Q. But you moved about and occasionally would go into
the White House, if escorted?
A. Correct.
Q. It takes a while, but I'll get there with you;
I'll catch up.

When did you actually—what was your first day on
the job with the Legislative Affairs, uh, group?

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

furlough. I was hired right before the furlough, but the
paperwork hadn’t gone through, so first day on the job was
some point after the furlough. I don’t remember the exact
date.

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

furlough--

   A   Correct.

   Q   --the Government shutdown period.

   A   Correct.

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

that?

   A   Yes.

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

the--the--we’re going to talk about a relationship with the
President. Uh, when you first, uh, I guess, saw him, I
think there was some indication that you didn’t speak to him
maybe the first few times you saw him, but you had some eye
contact or sort of smiles or--

   A   I--I believe I’ve testified to that in the grand

jury pretty extensively.

   Q   Uh-huh.

   A   Is--is there something more specific?

   Q   Well, again, I’m wanting to know times, you know,
how soon that occurred and sort of what happened, you know, if you can--you know, there are going to be occasions where you--obviously, you testified extensively in the grand jury, so you're going to obviously repeat things today. We're doing the deposition for the Senators to view, we believe, so it's--

MR. CACHERIS: May I note an objection. The Senators have the complete record, as you know, Mr. Bryant, and she is standing on her testimony that she has given on the occasions that Mr. Stein alluded to at the introduction of this deposition.

MR. BRYANT: Well, I appreciate that, but, uh, if this is going to be the case, we don't even need the deposition, because we're limited to the record and everything is in the record. So I think, uh, to be fair, we're--we're obviously going to have to talk about, uh, some things for 8 hours here, or else we can go home.

THE WITNESS: Sounds good to me.

[Laughter.]

MR. BRYANT: I think we probably all would like to do that.

SENATOR Dewhing: Counsel, are you objecting to the question?

MR. CACHERIS: Yes. I'm objecting to him asking specific questions that are already in the record that--he
has said they are limited to the record, and so we accept
his, his designation. We're limited to the record.

SENATOR DeWINE: We're going to go off the record
for just a moment.

THE VIDEOGRAPHER: We're going off the record at
9:37 a.m.

[Recess.]

THE VIDEOGRAPHER: We are going back on the record
at 9:45 a.m.

SENATOR DeWINE: We are now back on the record.
The objection is noted, but it's overruled, and
the witness is instructed to answer the question.

Senator Leahy?

SENATOR LEAHY: And I had noted during the break
that obviously, the witness has 48 hours to correct her
deposition, and would also note that when somebody has
testified to some of these things 20 or more times that it
is not unusual to have some nuances different, and that
could also be reflected in time to correct her testimony.

And I had also noted when we were off the record
Mr. Manager Bryant's comment on January 26th, page 8992 in
the Congressional Record, in which he said: "If our motion
is granted, I want to make this very, very clear. At no
point will we ask any questions of Monica Lewinsky about her
explicit sexual relationship with the President, either in
deposition or, if we are permitted on the floor of the Senate, they will not be asked."

And I should add also, to be fair to Mr. Bryant, another sentence in that: "That, of course, assumes that White House Counsel does not enter into that discussion, and we doubt that they would." Period, close quote.

SENATOR DWINE: Let me just add something that I stated to counsel and to Ms. Lewinsky off the record, and I think I will briefly repeat it, and that is that counsel is entitled to an answer to the question, but Ms. Lewinsky certainly can reference previous testimony if she wishes to do that. But counsel is entitled to a new explanation of-- of what occurred.

Counsel, you may--why don't you re-ask the question, and we will proceed.

MR. BRYANT: May I, before I do that, ask a procedural question in terms of timekeeping?

SENATOR DWINE: The time is not counted--any of the time that you have--once there is an objection, none of the time is counted until we rule on the objection and until you then have the opportunity to ask the question again. So the time will start now.

MR. BRYANT: Very good.

BY MR. BRYANT:

Q Ms. Lewinsky, again, let me--I know this is
difficult, but let me apologize that, uh, that it is going
to be necessary that I ask you these questions because we're
limited to the record and if we--we can't ask you any new
questions outside that record, so I have to talk about
what's in the record. And I realize you've answered all
these questions several times before, but it's, uh--I'm
sincere that we really wouldn't need to take your deposition
if we couldn't ask you those kinds of questions. So it's
not motivated to cause you discomfort or to make you sit here
in Washington when you'd rather be in California. We'll try
to get through this as quickly as we can.

But we were talking about when you were first
assigned there at the White House and those initial
contacts, and I mean, again, when you were--you would see
the President. I think you've mentioned you would--there
was some mild flirting going on; you would smile or you
would make eye contact. It was something of this nature?

A  Yes.

Q  And the first--was the first time you actually
spoke to the President or he spoke to you, other than
perhaps a hello in the hallway, was that on November the
15th, 1995?

A  Yes.

Q  And that was--that was the day, uh, of the first
so-called salacious encounter, the same day?
A Yes.

Q Now, when the President gave a statement testifying before the grand jury, he--he described that relationship as what I considered sort of an evolving one. He says: "I regret that what began as a friendship came to include this conduct." And he goes on to take full responsibility for his actions. But that almost sounds as if this was an evolving--something from a friendship evolving over time to a sexual relationship. That was not the case, was it?

A I--I can't really comment on how he perceived it. My perception was different.

Q Okay--

A But I--I--I mean, I don't feel comfortable saying that he didn't, that he didn't see it that way, or that's wrong; that's how he saw it. I--

Q But you saw it a different way?

A Yes.

Q Now, on November the 15th, had you already accepted this job with Legislative Affairs?

A Yes.

Q And, uh, was--that was during the shutdown, so you had no job to go to because the Government was shut down.

A No. I accepted it on the Friday before the furlough.
Q And that--
A But the paperwork hadn't gone through.
Q Okay. Did, uh--when you first met with the
President on November the 15th, did he say anything to you
that would indicate that he knew you were an intern?
A No.
Q Did he make a comment about your, your pink
security badge?
A Can I ask my counsel a question real quickly,
please?

[Witness conferring with counsel.]
MR. CACHERIS: Okay, Mr Bryant.
THE WITNESS: Sorry. It was--that occurred in the
second encounter of that evening.

BY MR. BRYANT:
Q Okay. On November--
A So, not the first encounter.
Q On November the 15th, 1995?
A Correct.
Q What--do you recall what he said or what he did in
regard to the intern pass?
A He tugged on my pass and said: "This is going to
be a problem."
Q And what did, uh--did he say anything else about
what he meant by "problem"?
A No.
Q Tell me about your job at Legislative Affairs. Did that involve going into the White House itself?
A Yes. My job was in the White House.
Q You were in one wing, but did that involve going--
did it give you access--
A Yes.
Q --pretty well throughout the White House?
A Yes.
Q What did you do primarily?
A I worked under Jocelyn Jolly, who supervised the letters that came from the Hill; so the opening of those letters and reading them and vetting them and preparing responses for the President's signature--responding.
Q Now, you've indicated through counsel at the beginning that you are willing to affirm, otherwise adopt, your sworn testimony of August the 6th and August the 20th, I think, which would be grand jury, and the deposition of August the 26th, 1998.
A Correct.
Q So you're saying that that information is accurate, and it is truthful?
A Yes.
Q Well, thank you. That--that will save us a little bit of time, but certainly we will ask you some of that
information also.

At some point, you were transferred to the
Pentagon, to the Department of Defense. When did that
occur?

A I found out I was being transferred on April 5th,
1996.

Q Did you want to go--

A No.

Q --to the Department of Defense? Did you have a
discussion with the President about this?

A Yes.

Q What was your reaction to being transferred?

A I started to cry.

Q Did you talk to anyone else at the White House
other than the President about the transfer at that time?

A Yes.

Q And who--who was that?

A I spoke with several people. I--I can't--I know
I--I spoke with, uh, Jocelyn about it. I spoke with people
with whom I was friendly at the White House. I spoke to
Betty, Nancy Hernreich, several people.

Q Did you--did you find out why you were being
transferred?

A Uh, I was told why I was being transferred by Mr.
Keating on Friday, the 5th of April.
Q And that was why?
A Uh, he said that the--the Office of Administration, I think it was, was not pleased with the way the correspondence was being handled, and they were, quote-unquote, "blowing up" the Correspondence Office, and that I was being transferred and it had nothing to do with my work.
Q Did you have any understanding that it might have been other reasons that you were being moved?
A Not at that point.
Q Did the--what did the President say about your transfer at that point?
A He thought it had something to do with our relationship.
Q What else did he say about--about your transfer, if anything? Did he give you any assurances that you might be back, or--
A Yes.
Q Back after what time period?
A He promised me he'd bring me back after the election.
Q So this was, again, in early 19--April of 1996, and he was up for reelection--
A Yes.
Q --in November of 1996.
A Yes.
Q. Did you attach any significance to being transferred away before the election and then him assure you he would bring you back after the election? Did you attach any significance to the election and your having to leave?

A. Emotional significance, yes.

Q. Your emotion? I'm--I'm not sure I follow you.

You were--

A. Well, yes, I attached significance to it.

Q. And that was emotional--

A. But that was emotional.

Q. But the reason you both felt--again, I'm not trying to put words in your mouth, but you both felt you were leaving until after the election was because of your relationship and perhaps people finding out?

A. No. I--I--first, I can only speak for myself. I mean, I, uh, my understanding initially was that it was, um, for work-related issues, but not my work, and I came to understand later that it was having to do with my relationship with the President.

Q. Okay. Did, uh, you have a conversation--and it may be the same one with the President on April the 12th--which determined that Ms. Lieberman maybe spearheaded your transfer because you were paying too much attention--you were all--you were both paying too much attention to each
other and she was worried that it was close to election
time? And I think you’ve testified to that, haven’t you?
A Yes.
Q Okay, good. You started, uh, with the Department
of Defense at the Pentagon in mid-April, April the 17th,
1996?
A Yes.
Q What did you do there?
A I was the confidential assistant to Mr. Bacon, who
is the Assistant Secretary of Defense for Public Affairs.
Q Did, uh—after the 1996 election, did you still
want to go back to the White House?
A Yes.
Q You had not fallen in love with the job at the
Pentagon that much?
A No.
Q Was that, in fact, a frustrating period of time?
A Yes. No offense to Mr. Bacon, of course.
Q I understand; I’m sure he would take none.
I would like—I don’t think it’s been mentioned,
but you helped in preparing a chart which we have listed as
one of our exhibits, ML Number 2, which I assume might have
a different number for now, but it’s a chart of contacts—
A Right.
Q --that you had with the President. And do you
have a copy of that chart? It--

[Witness conferring with counsel.]

MR. BRYANT: In the--yes, in the record, it's at
page 1251.

MR. BURTON: May we have an extra copy for
counsel, please?

BY MR. BRYANT:

Q Have you had occasion to review this document?

A Yes.

Q And very--very simply, I would like for you to,
uh, if you can, to affirm that document as an accurate
representation and a truthful representation of all the
contacts that you had with the President from approximately
August 9th, 1995 until January of 1998. It includes in-
person contacts, telephone calls, gifts and notes exchanged.
I think are the categories.

A Yes. I believe there might have been one or two
changes that were made and noted in the grand jury or my
deposition, and I adopt those as well.

MR. BRYANT: Okay, good.

I am not going to at this point make her--the
information she adopts and affirms exhibits to this
deposition. I don't want to clutter it any more unless
someone wants to make this an exhibit in terms of your
deposition testimony, your grand jury testimony, and now the
charts that you have affirmed, so I just want you to
specifically affirm it but not make it an exhibit, because
it's already a part of the record.

MR. CACHERIS: We defer to the White House.

MS. SELIGMAN: I just wanted to make clear on the
record, then, what the app. or sub-cite is of anything we're
adopting so that we all know what particular pages it is.

MR. BRYANT: Okay. And that, again, was, I think,
page 1251 of---right, of the record.

SENATOR LEAHY: I don't--I don't understand.

MS. MILLS: Can you cite the ending page?

SENATOR DeWINE: Counsel, is that where this
appears?

MR. BRYANT: It appears in the record, uh--

SENATOR DeWINE: You need to designate also if
you're talking about the Senate record or--I think at this
point we'll go off the record.

THE VIDEOGRAPHER: We're going off the record at
10:01 a.m.

[Recess.]

THE VIDEOGRAPHER: We are going back on the record
at 10:11 a.m.

SENATOR DeWINE: Let me--we're now back on the
record.

Let me advise counsel, the Managers, that they
have used 25 minutes so far.
You may resume questioning, and if you could begin
by identifying the exhibit for the record, please.

MR. BRYANT: Tom, let me also for clarification
purposes--Tom, on the referral to the Senate record, you’re
saying that the appendices are numbered 3, but the numbers
are the same. The page numbers are the same.

MR. GRIFFITH: Yes.

MR. BRYANT: And the supplemental materials are
your Volume IV, but, again, the pages are the same.

MR. GRIFFITH: That’s our understanding.

MR. BRYANT: Okay. For the record, then, using
the Senate volumes, if this is an appendices, Volume III,
and the chart that we just alluded to before the break
is--appears at pages 116 through 126 of the Senate record,
Volume III.

BY MR. BRYANT:
Q Ms. Lewinsky, did you tell a number of people in
varying details about your relationship with the President?
A Yes.

Q Can you tell us who did you tell?
A Catherine Allday Davis, Nyea Deman Erbland,
Natalie Ungvari, Ashley Raines, Linda Tripp, Dr. Kathy
Estep, Dr. Irene Kassoria, Andy Bleiler, my mom, my aunt.
Who else has been subpoenaed?
Q  Okay. Let me suggest Dale--did you mention Dale
Young?
A  Dale Young. I'm sorry.
Q  Thank you.

Now, in the floor presentation, Mr. Craig, who was
one of--is one of the counsel for the President, adopted an
argument that had been raised in some of the previous
hearings, uh, and he adopted this argument in the Senate
that--that you have--have or had, I think, both past and
present, the incentive to not tell the truth about how the
President--this relationship with him because you wanted to
avoid--and again, I use the quote from Mr. Craig's
argument--the demeaning nature of providing wholly un-
reciprocated sex.

Did, uh--did you lie before the grand jury and to
your friends about the nature of that relationship with the
President--
A  No.
Q  --so as to avoid what Mr. Craig says? Okay, and
I'll break it down.

SENIOR DEWEY: Counsel, do you want to just--
just rephrase the question?

MR. BRYANT: Okay. We'll break it down into two
questions.

BY MR. BRYANT:
Q. Did you not tell the truth before the grand jury as to how the President touched you because of what Mr. Craig alleges as the demeaning nature of the wholly unreciprocated sex?

MR. CACHERIS: Well, that--may I register an objection, gentlemen? This witness is not here to comment on what some lawyer said on the floor of the Senate. He can ask her direct questions. She will answer them, but what Mr. Craig said or didn't say would have happened after her grand jury testimony. So it's totally inappropriate that he's--

SENATOR D'WINE: Mr. Bryant, why don't you--

MR. CACHERIS: --marrying those two concepts. We object.

SENATOR D'WINE: Mr. Bryant, why don't you just rephrase the question?

MR. BRYANT: Well, we--we have had presented on behalf of the President a defense, an incentive, a reason why she would not tell the truth, and I think she should have the opportunity to respond to that--that allegation.

MR. CACHERIS: We--we don't, uh--

SENATOR LEARY: Ask her a direct question.

MR. CACHERIS: We welcome you asking her if her testimony was truthful, and she will tell you that it is truthful. We don't have any problem with that. We don't
have any brief with what the White House did or didn't do
through their counsel. That's their business. We don't
represent the White House.

MS. SELIGMAN: So, for the record, I'd like to
object to the characterization of what Mr. Craig says, which
obviously speaks for itself, j|||certainly. want my
silence to be construed as accepting the Manager's
characterization of it.

SENATOR DeWINE: Mr. Bryant, why don't you--why
don't you ask the question?

MR. BRYANT: Okay.

SENATOR DeWINE: Go ahead and ask your question.

BY MR. BRYANT:

Q In regard to your testimony at the grand jury
about your--your relationship and the physical contact that
you have said occurred in some of these, uh, visits with the
President, it has been characterized in a way that would
give you an excuse not to tell the truth. Did you tell the
truth in the grand jury about what actually happened and how
the President touched--the President touched you?

A Yes.

Q And did you likewise tell the truth to your
friends in connection with the same matters?

A Yes.

Q Did your relationship with the President involve
giving gifts, exchanging gifts?

A Yes.

Q And you mentioned earlier that in reference to this chart that it was, uh, subject to certain corrections you’ve made in later testimony. It was an accurate representation or an accurate compilation of the gifts that, uh, you gave the President and the President gave you. Is that correct?

A Yes.

Q Approximately how many gifts did you give the President?

A I believe I’ve testified to that number. I don’t recall right now.

Q About 30? Would that be--

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

Q That’s the number I have, and do you recall how many gifts approximately the President gave you?

A It would be the same situation.

Q Okay, and you’ve previously testified in your grand jury that he gave you about 18 gifts.

A I accept that.

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

A They varied. I think they’re listed on this chart, and I’ve testified to them.
Q Okay, and--

MR. CACHERIS: Do you want her to read the list that's on this chart?

MR. BRYANT: No. I was just, again, looking for just a--I think maybe a little broader category, but that's--that's okay. That's an acceptable answer there.

BY MR. BRYANT:

Q After leaving the White House and going to the Pentagon, did you continue to visit the President?

A Yes.

Q How would you--how would you be transported from the Pentagon over to the White House? How did you get there?

A I drove or took a taxi.

Q Do you have your own car?

A No.

Q Whose--whose car would you drive?

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

Q So you did have access to a vehicle?

A Correct.

Q Okay. How were these meetings arranged when you would want to go from the Pentagon to the White House? How did--how did these--how were they set up? Did you get an appointment?

(The witness conferring with counsel.)
SENATOR DEWINE: Counsel—if you have to ask

counsel, you can stop and ask us--

THE WITNESS: Okay.

SENATOR DEWINE: --to do that.

BY MR. BRYANT:

Q  How were these meetings arranged?

A  Through Ms. Currie.

Q  Would--would you call her and set the meeting up,
or would she call you on behalf of the President and set the
meeting up?

A  It varied.

Q  Both--both situations occurred?

A  Correct.

Q  Now, Ms. Currie is the President's--that's Betty Currie, we're talking about, the President's secretary?

A  Yes.

Q  Why was this done? Why was that procedure used?

A  It was my understanding that Ms. Currie took care
of the President's guests who were coming to see him, making
those arrangements.

Q  Was, uh--was this--were these visits done sort of
off the record, so to speak, so it wouldn't necessarily be a
record?

A  I believe so.

Q  In other words, you wouldn't be shown on Betty
Currie's calendar or schedule book for the President?
A I don't know.
Q Did--who suggested this type of arrangement for
setting up meetings?
A I believe the President did.
Q During this time that you were at the Department
of Defense at the Pentagon, uh, how--how was it working out
about you being transferred back to the White House? How
was the job situation coming?
A Well, I waited until after the election and then
spoke with the President about it on several occasions.
Q And what would he say in response?
A Various things; "I'm working on it," usually.
Q In July, uh, particularly around the--the 3rd and
4th of July, there--there--you wrote the President a letter,
I think.
A Which year?
Q July of '90--it would have been '97 that you wrote
the President a letter expressing some frustrations about
the job situation in terms of--is that, uh--can you tell us
about that?
A Yes. I had had a--well, I guess I was--I know
I've testified about this, I mean, in the grand jury, but I
was feeling at that point that I was getting the runaround
on being brought back to the White House. So I sent a
letter to the President that was probably the harshest I had
sent.
Q Did you get a response?
A Sort of.
Q Would you explain?
A Um, Betty called me and told me to come to the
White House the next morning, on July 4th, at 9:00 a.m.
Q And what happened when you--I assume you went to
the White House on July the 4th. What happened?
A I know I--I--do you have a specific question? I
know I testified, I mean, extensively about this whole day,
that whole--
Q Well, in regards to--let's start with the job.
A Well, I started crying. We were in the back
office and, um--and when the subject matter came up, the
President was upset with me and then I began to cry. So--
Q Did he encourage you about coming back? Did
he make a promise or commitment to you that he would make
sure you came back to work at the White House?
A I don't know that he reaffirmed his promise or
commitment. I remember leaving that day thinking that, as
usual, he was going to work on it and had a renewed sense of
hope.
Q Did he comment on your letter, the tone of your
letter?
A Yes.
Q What did he say?
A He was upset with me and told me it was illegal to threaten the President of the United States.
Q Did you intend the letter to be interpreted that way?
A No.
Q Did you explain why you wrote the letter to him about reminding him that you were a good girl and you left the White House? Did you have that type of conversation?
A Yes. That’s what made me start to cry.
Q Did you, uh—did you ever explain to him that you didn’t intend to threaten him?
A I believe so.
Q What was the intent of the letter?
A First, I felt the letter was going to him as a man and not as President of the United States. Um, second, I think I could see how he could interpret it as a threat, but my intention was to sort of remind him that I had been waiting patiently and what I considered was being a good girl, about having been transferred.
Q And the threat we’re talking about here would not have been interpreted as a threat to do physical injury or bodily injury to him. It was to expose your relationship to the--to your parents--
A  Correct.
Q  --explain to them why you were not going back to
the White House--
A  Correct.
Q  --after the election?
And certainly the President did not encourage you
to expose that relationship, did he?
A  I don't believe he made any comment about it at
that point.
Q  His only comment about the so-called threat was
that it's a--it's--you can't do that, it's against the law
to threaten the President?
A  Exactly.
Q  That meeting turned into--I guess you've testified
that that meeting did turn into a more positive meeting
toward the end. It was not all emotional and accusations
being made?
A  Correct.
Q  At some point, uh--well, let me--let me back up
and ask this. There was a subsequent meeting on July the
14th, and I believe the President had been out of town and
this was the follow-up meeting to the July 4th meeting where
you had originally discussed the possibility of a newspaper
reporter or a magazine writer, I believe, writing a story
about Ms. Willey?
A Correct.
Q And you, uh—did you have any instructions from the President, from either of these meetings, about doing something for the President, specifically about having Ms. Tripp call White House counsel—
A I don’t know—
Q --Mr. Lindsey?
A --that I’d call them instructions.
Q Okay. What did he tell you? I don’t want to mischaracterize.
A He asked me if I would try to have Ms. Tripp contact Mr. Lindsey.
Q Okay, and if you were to be successful in doing that, what were you supposed to do? Were you supposed to contact Ms. Currie, his secretary?
A Yes.
Q And what were you supposed to tell her?
A In an innocuous way that I had been able to convey that to Ms. Tripp or get her to do that.
Q Now, in—-at some point in October of that year, 1997, did your job focus change?
A Yes.
Q And how was that? What were you doing?
A Uh, it really changed on October 6th, 1997, as a result of a conversation with Linda Tripp.
Q Uh, in that, as I understand, you sort of got secondhand information that you were probably never going back to work at the White House.

A Correct.

Q Did you understand what that meant? Did you accept that? And I guess why would you accept it at that point? Why would you give up on the White House?

MR. CACHERIS: Those are three questions, Mr. Bryant. Will you--would you break it down, please?

MR. BRYANT: Well, yeah, it’s true.

BY MR. BRYANT:

Q Do you understand? I guess I’m trying to clarify.

A Not really. I’m sorry.

Q Why would you accept at that point in October that you were never going back to the White House?

A I don’t really remember, I mean, what--what--what was going through my mind at that point as to--to answer that question. Is that--

Q Okay.

A I’m sorry.

Q Certainly, if you don’t remember, that’s a--that’s a good answer.

A Okay.

Q So you don’t recall anything had really changed other than you had heard secondhand that you weren’t going
to go back. You have no independent recollection of
anything else other than what somebody told you that would
have changed--
A  My recollection is--
Q  --changed your focus?
A  --that it was this--it was this conversation, what
Linda Tripp told me from whom this information was coming,
the way it was relayed to me that--that shifted everything
that day.
Q  And you didn’t feel it was necessary to go back to
the President and perhaps confront the President and say,
"why am I not coming back, I want to come back?"
A  I mean, I had a discussion with the President, but
I had made a decision from that based on that information,
and I guess my--my experience of it coming up on a year from
the election, having not been brought back, that it probably
wasn’t going to happen.
Q  But you--you did call the President about that
time and then--but the focus had been changed toward perhaps
a job in another location.
A  Yes and no. I didn’t call him, but I, um--
Q  You called Betty--
A  --but we did have a discussion about that.
Q  You called Betty Currie, his secretary.
A  Yes.
Q: Okay, and then through her, he contacted you and you had a discussion?
A: Yes.
Q: And what did you tell him at that time about the job?
A: I believe I testified to that, so that my testimony is probably more accurate. The gist of it was, um, that I wanted to move to New York and that I was accepting I wasn't going to be able to come back to the White House, and I asked for his help.
Q: Did you bring up Vernon Jordan's name as perhaps somebody that could help you?
A: It's possible it was in that conversation.
Q: What was the President's comments back to you about your deciding to go to New York?
A: I don't remember his exact comments. He was accepting of the concept.
Q: In regards to your--your, uh, decision to search for a job in New York, in your comments to the President, did he ever tell you that that was good, that perhaps the Jones lawyers could not easily find you in New York?
A: I'm sorry. I don't--I--I--
MR. CACHERIS: Excuse me again, Mr. Bryant.
That's a compound question. He could--she could answer it was good, and then she could answer maybe the Jones lawyer
couldn't get her, but I think you'd want an answer to each
question.

BY MR. BRYANT:

Q Okay. Let me ask it this way. There has been
some reference to that fact throughout the proceedings, and
I recall seeing something somewhere in your--your testimony
that you said it or he said it. Do you recall anything
being said about you going to Washington--to New York and
that the effect of that might be that you would be more
difficult to find?

A I believe that might have been mentioned briefly
on the 28th of December, but not as a reason to go to New
York, but as a possible outcome of being there. Does that--
does that make sense?

Q It does.

A Okay.

Q What, uh--what would have been the context of
that? And we're jumping ahead to December the 28th, but
what would have been the context of that particular
conversation about the New York and being perhaps--the
result being it might be difficult to find you, or more
difficult? What was the context?

A Um, I--I--if I remember correctly, it came sort of
at the tail-end of a very short discussion we had about the
Jones case.
Q: At this November the 11th meeting, did the President ask you to prepare a list, sort of a wish list for jobs?

A: I'm sorry. Which--

Q: I'm sorry. Did I say October? We're back to the October the 11th meeting. Did the President ask you to prepare a wish list?

A: Okay. We haven't gone to the October 11th meeting yet. I--I haven't said anything about that meeting yet.

Q: Okay.

A: The phone call was on the 9th.

Q: Okay, and you subsequently had a meeting, then, with the President on the 11th?

A: Correct.

Q: Face-to-face meeting?

A: Correct.

Q: And at that meeting, did he suggest you give him a wish list or Betty Currie a wish list?

A: Yes.

Q: Again, I asked a compound question there. Who did he suggest you give the wish list to?

MR. CACHERIS: We're getting used to that.

MR. BRYANT: I'm getting good. I'm making my own objections now.

[Laughter.]
THE WITNESS: Um, we sustain those. No, I'm sorry.

[Laughter.]

MR. BRYANT: I can do that, too. I'll be doing that in a minute. Overruled. Okay.

THE WITNESS: Um, I--I believe he--he said I should get him a list, and the implication was through Betty.

BY MR. BRYANT:

Q And obviously you prepared a list of--

A Correct.

Q --the people you'd like to work for in New York City.

A Correct.

Q And you sent that list--

A Yes.

Q --to Betty Currie or to the President?

A I sent it to Ms. Currie.

Q And also during this time--and I'm probably going to speed this up a little bit, but, uh, you did interview for the job at the United Nations?

A Yes.

Q And, uh--and through a process of several months there, or weeks at least, you did--made an offer to take a job at the United Nations and eventually declined it. Is
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that correct?
A  Correct.
Q  Did you in early November have the occasion to
meet with Vernon Jordan about the job situation?
A  Yes.
Q  And how did you learn about that meeting?
A  I believe I asked Ms. Currie to check on the
status of--I guess of finding out if I could have this
meeting, and then she let me--she let me know to call Mr.
Jordan's secretary?
Q  And you set up an appointment with Mr. Jordan, or
did she, Ms. Currie, do that?
A  No. I set up an appointment. I think that was
after a phone--well, I guess I don't--I don't know that, so
sorry.
Q  But that appointment was November the 5th?
A  Yes.
Q  Prior to going to the meeting with Vernon Jordan,
did you tell the President that you had a meeting with Mr.
Jordan?
A  I don't think so. I don't remember.
Q  Did you carry any documents or any papers with you
to the meeting with Mr. Jordan?
A  Yes.
Q  What were those?
A My resume and a list of public relations firms in New York.

Q Did Mr. Jordan ask you why you were there?
A Yes.

Q And what did you say?
A I was hoping to move to New York and that he could assist me in securing a job there.

Q Did he ask you why you wanted to leave Washington?
A Yes.

Q And what was your answer?
A I gave him the vanilla story of, um, that I--I think I--I don’t remember exactly what I said. I--I believe I’ve testified to this. I think it was something about wanting to get out of Washington.

Q The vanilla story. You mean sort of an innocuous set of reasons, not really the true reasons you wanted to leave?
A Yes.

Q And what were the true reasons you wanted to leave?
A Because I couldn’t go back to the White House.

Q Did--did you think Mr. Jordan accepted--did you think he would accept that vanilla story, or did you feel like he understood the real story?
A No, I felt he accepted it.
Q Did Mr. Jordan tell you during this meeting that he had already spoken with the President?
A It was—I believe so.
Q And that you had come highly recommended, I think?
A Yes.
Q Did he, Mr. Jordan, review your list of job preferences and suggest anything?
A Yes.
Q And what did he suggest?
A He said the names of the—he looked at the list of public relations firms and I think sort of said, "oh, I've heard of them, I haven't heard of these people, have you heard of so and so," that I hadn't heard of.
Q Your meeting lasted about 20 minutes?
A If that's what I've testified to, then I accept that.
Q It is, or close to it. I know this is an approximation, but thereabouts. You weren't there all day.
A I had—well, I don't—I don't remember how long it was right now. I know I've testified to that. So if I said 20 minutes, then—
Q Did you have a conversation with the President on—about a week later on November the 12th and by telephone?
A Yes.
Q. And did you indicate there you had spoken with Mr. Jordan about a job?

A. Yes.

Q. After you met with Mr. Jordan, did you--did you have an impression that you would get, uh--get a job, get favorable results in your job search?

A. Yes.

Q. Did anything favorable happen to--in your job search from that November the 5th, 1997, meeting until Thanksgiving?

A. No, but I believe Mr. Jordan was out of town for a week or two.

Q. During the weeks after this November the 5th interview, did you try to contact Mr. Jordan?

A. Yes.

Q. How?

A. First, I sent him a thank-you note for the initial meeting, and I believe I placed some phone calls right before Thanksgiving--maybe a phone call. I don't remember if it was more than one.

Q. What--what happened with respect to the job search, uh, through there, through Thanksgiving? Was there anything? I mean, I know he--you said he was out of town, but did anything, to your knowledge, occur? Could you see any results up to Thanksgiving?
A From my meeting with Mr. Jordan?
Q Yes.
A No.
Q Did you contact Betty Currie after you received no response from Mr. Jordan?
A Yes.
Q And did she page you? I think you were in Los Angeles at the time.
A Correct.
Q Okay. What--what did she tell you as a result of that telephone call?
A She asked me to place a call to Mr. Jordan, which I did.
Q And this would have been, again, around November the 26th, shortly--well, around Thanksgiving?
A It was before Thanksgiving.
Q And I assume you found Mr. Jordan.
A Yes.
Q And what did he tell you?
A That he was working on it.
Q Did he tell you to call him back?
A Yes.
Q Did you indeed call him back
A I didn't actually get ahold of him; he was out-of-town that day. I think it was December 5th.
Q Did you try to meet with the President during this time?
A Yes.
Q How did you do that?
A I was a pest. I sent a note to Ms. Currie and asked her to pass it along to the President, requesting that I meet with him.
Q Were you successful in having a meeting as a result of those efforts?
A I don't know if it was a result of those efforts, but yes, I ended up having a meeting with the President.
Q And when would that have been; what day?
Q Again you are going through Betty Currie; is that, again, the standard procedure at that time?
A Yes.
Q Did you go—I think you spoke also perhaps to Betty Currie on December the 5th, the day before the meeting—
A Yes.
Q—and this was something about attending the President's speech. Was that when that occurred—or the radio address, or something? Does that ring any bells?
A No.
Q Did—you did attend the Christmas party that day—
Q --and the White House. And you saw the President?
A Yes.
Q Just socially, speak to him, and that's it?
A Yes.
Q Picture, handshaking, and that?
A [Nodding head.]
Q Okay. That's a yes?
A Yes. Sorry.
Q Prior to December 6th, 1997, had you purchased a Christmas gift for the President?
A Yes.
Q Which was?
A An antique standing cigar holder.
Q And you purchased any other additional gifts for him?
A Yes.
Q And what were those?
A Uh, a Starbucks mug that said "Santa Monica"; a necktie that I got in London; a little box--I call it a "chockki"--from, uh--and a book on Theodore Roosevelt.
Q Was it your intention to, to carry those Christmas presents to the President home that Saturday, December the 6th?
A. If I were to have a meeting with him, yes.

Q. Did you attempt to have a meeting?

A. Yes.

Q. Did you go through Betty Currie?

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

Q. And when you went to the White House that day, you also attempted to, to have the meeting through calling Betty Currie and telephoning her; I believe you had to go to--

A. Which day? I'm sorry.

Q. On the 6th.

A. No.

Q. The Saturday.

A. [No response.]

Q. No?

A. I attempted to give the presents to Betty, but I didn't call and attempt to have a meeting there--well, I guess I called in the morning, so that's not true--I'm sorry. Yes, I called Ms. Currie in the morning trying to see if I could see the President and apologize.

Q. And--were you--did you see the President, then, on the 6th?

A. Yes, I did.

Q. Tell us about that meeting--that was a long--was that, um--did you have a telephone conversation with him
Q And that was the long telephone conversation?
A It--it was.
Q Okay. I think there has been some indication it
may have been 56 minutes, something approximating an hour-
long conversation; does that sound right?
A Right. That would--that might include some
conversation time with Ms. Currie as well.
Q Okay. Was he interrupted by Ms. Currie--could you
tell--did he have to take a break from the telephone call to
talk to Ms. Currie, or do you recall any, any--
A I don't recall that.
Q --do you recall any breaks to talk to anybody
else?
A I don't recall that. Doesn't mean it didn't
happen; I just don't remember it.
Q What else did you--did you arrange in that
telephone conversation, or did he invite you in that
telephone conversation to come to the White House that day?
A Yes, he did.
Q What happened during, during that conversation in
terms of--I understand that it was again an emotional day,
some sort of a word fight; is that right?
A Yes.
Q. Could you tell me—he was, uh—again, to perhaps
save some time—he was angry about an earlier incident, and,
Uh, he felt like you were intruding on his lawyer time?
A. Uh, he was upset that I hasn’t accepted that he
just couldn’t see me that day.
Q. And what was your response to that?
A. Probably not positive. Uh, that’s why it was a
fight.
Q. Again, I want to be careful that I don’t put words
in your mouth, but you were dealing with this relationship
from an emotional standpoint of wanting to spend time with
him—
A. Yes.
Q. --not as President, but as a man?
A. Correct.
Q. And this was at a point when you didn’t feel like
you were spending enough time with him?
A. Correct.
Q. And he obviously felt he had to do other things,
too, talk to lawyers and do those kinds of things—be the
President—is that right?
A. Yes.
Q. Okay. Now, was some of this discussion that we
term “the fight,” was that over the telephone?
A. Yes. It was all over the telephone.
Q So by the time you arrived and had the face-to-face meeting with him, that was over?
A Correct.
Q Was that during the time that you exchanged--exchanged some of the Christmas presents with him?
A In--in the meeting?
Q Yes.
A Yes. I gave him my Christmas presents.
Q Did you discuss the job search with him also at that time?
A I believe I mentioned it.
Q Did you tell him that, uh, your job search with Mr. Jordan was not going well?
A I don't know if I used those words. I don't, I don't remember exactly--
Q If your grand jury testimony said yes--I mean, words to that effect--that would--you could have used those words if they're in your grand jury--
A If my grand jury testimony says that--if that's what I said in my grand jury testimony, then I accept that.
Q I'm not trying to--I'm not trying to trick you.
A Okay.
Q Did he make any comment to you about what he might do to aid in your job search at that time, if you recall?
A I think he--I think he said, oh, let me see about
it, let me see what I can do--his usual.

Q Did, uh, did the President say anything to you at that time about your name appearing on a witness list in the Paula Jones case?

A No.

Q Did you later learn that your name had appeared on such a list?

A Yes.

Q And did you later learn that that witness list had been faxed to the White House--to the President's lawyers on December the 5th?

A Much later, as in last year.

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

A I, I mean--

Q Yes.

A --post this investigation.

Q Okay. All right. Let's go forward another week or so to December the 11th and a lunch that you had with Vernon Jordan, I believe, in his office.

A Yes.

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

A Through his secretary.

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

A I don't remember.
Q    What was the purpose of that meeting?
A    Uh, it was to discuss my job situation.
Q    And what, what--how was that discussed?
A    Uh, Mr. Jordan gave me a list of three names and
suggested that I contact these people in a letter that I
should cc him on, and that's what I did.
Q    Did he ask you to copy him on the letters that you
sent out?
A    Yes.
Q    During this meeting, did he make any comments
about your status as a friend of the President?
A    Yes.
Q    What--what did he say?
A    In one of his remarks, he said something about me
being a friend of the President.
Q    And did you respond?
A    Yes.
Q    How?
A    I said that I didn't, uh--I think I--my grand jury
testimony, I know I talked about this, so it's probably more
accurate. My memory right now is I said something about,
uh, seeing him more as, uh, a man than as a President, and I
treated him accordingly.
Q    Did you express your frustration to Mr. Jordan
with, uh, with the President?
A I expressed that sometimes I had frustrations with him, yes.

Q And what was his response to you about, uh--after you talked about the President?

A Uh, he sort of jokingly said to me, You know what your problem is, and don't deny it--you're in love with him. But it was a sort of light-hearted nature.

Q Did you--did you have a response to that?

A I probably blushed or giggled or something.

Q Do you still have feelings for the President?

A I have mixed feelings.

Q What, uh--maybe you could tell us a little bit more about what those mixed feelings are.

A I think what you need to know is that my grand jury testimony is truthful irrespective of whatever those mixed feelings are in my testimony today.

Q I know in your grand jury you mentioned some of your feelings that you felt after he spoke publicly about the relationship, but let me ask you more about the positive--you said there were mixed feelings. What about--do you still, uh, respect the President, still admire the President?

A Yes.

Q Do you still appreciate what he is doing for this country as the President?
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Q  Sometimes back in December of 1997, in the morning
of December the 17th, did you receive a call from the
President?

A  Yes.

Q  What was the purpose of that call? What did you
talk about?

A  It was threefold—first, to tell me that Ms.
Currie's brother had been killed in a car accident; second,
to tell me that my name was on a witness list for the Paula
Jones case; and thirdly, he mentioned the Christmas present
he had for me.

Q  This telephone call was somewhere in the early
morning hours of 2 o'clock to 2:30.

A  Correct.

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

A  No.

Q  Was this your first notice of your name being on
the Paula Jones witness list?

A  Yes.

Q  I realize he, he commented about some other
things, but I do want to focus on the witness list.

A  Okay.

Q  Did he say anything to you about how he felt
concerning this witness list?
A: He said it broke his heart that, well, that my name was on the witness list.

Can I take a break, please? I'm sorry.

Senator DeWine: Sure, sure. We'll take a 5-minute break at this point.

The Videographer: This marks the end of Videotape Number 1 in the deposition of Monica S. Lewinsky. We are going off the record at 10:56 a.m.

[Recess.]

The Videographer: This marks the beginning of Videotape Number 2 in the deposition of Monica S. Lewinsky. The time is 11:10 a.m.

Senator DeWine: We are now back on the record.

I will advise the House Managers that they have used one hour and 8 minutes.

Mr. Bryant, you may proceed.

Mr. Bryant: Thank you.

By Mr. Bryant:

Q: Did--did we get your response? We were talking about the discussion you were having with the President over the telephone, early morning of the December 17th phone call, and he had, uh, mentioned that it broke his heart that you were on that list.

A: Correct.

Q: And I think you were about to comment on that
further, and then you need a break.

A No.

Q No.

A I just wanted to be able to focus—I know this is an important date, so I felt I need a few moments to be able to focus on it.

Q And you're comfortable now with that, with your--you are ready to talk about that?

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

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

A Yes, sir.

Q Good. Now, with this discussion of the fact that your name appeared as a witness, had you—had you been asleep that night when the phone rang?

A Yes.

Q So were you wide awake by this point? It's the President calling you, so I guess you're—you wake up.

A I wouldn't say wide awake.

Q He expressed to you that your name—you know, again, you talked about some other things—but he told you your name was on the list.

A Correct.

Q What was your reaction to that?

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

A No.

Q What did you understand you would be saying in that affidavit to avoid testifying?

A Uh, I believe I've testified to this in the grand jury. To the best of my recollection, it was, uh--to my mind came--it was a range of things. I mean, it could either be, uh, something innocuous or could go as far as having to deny the relationship. Not being a lawyer nor having gone to law school, I thought it could be anything.

Q Did he at that point suggest one version or the other version?

A No. I didn't even mention that, so there, there wasn't a further discussion--there was no discussion of what would be in an affidavit.

Q When you say, uh, it would be--it could have been something where the relationship was denied, what was your thinking at that point?

A I--I--I think I don't understand what you're asking me. I'm sorry.

Q Well, based on prior relations with the President, the concocted stories and those things like that, did this come to mind? Was there some discussion about that, or did it come to your mind about these stories--the cover stories?
A    Not in connection with the--not in connection with
the affidavit.

Q    How would--was there any discussion of how you
would accomplish preparing or filing an affidavit at that
point?

A    No.

Q    Why--why didn't you want to testify? Why would
not you--why would you have wanted to avoid testifying?

A    First of all, I thought it was nobody's business.
Second of all, I didn't want to have anything to do with
Paula Jones or her case. And--I guess those two reasons.

Q    You--you have already mentioned that you were not
a lawyer and you had not been to law school, those kinds of
things. Did, uh, did you understand when you--the potential
legal problems that you could have caused yourself by
allowing a false affidavit to be filed with the court, in a
court proceeding?

A    During what time--I mean--I--can you be--I'm
sorry--

Q    At this point, I may ask it again at later points,
but the night of the telephone--

A    Are you--are you still referring to December 17th?

Q    The night of the phone call, he's suggesting you
could file an affidavit. Did you appreciate the
implications of filing a false affidavit with the court?
A I don't think I necessarily thought at that point it would have to be false, so, no, probably not. I don't—I don't remember having any thoughts like that, so I imagine I would remember something like that, and I don't, but—

Q Did you know what an affidavit was?
A Sort of.
Q Of course, you're talking at that time by telephone to the President, and he's—and he is a lawyer, and he taught law school—I don't know—did you know that?
A Did you know he was a lawyer?
A I--I think I knew it, but it wasn't something that was present in my, in my thoughts, as in he's a lawyer, he's telling me, you know, something.
Q Did the, did the President ever tell you, caution you, that you had to tell the truth in an affidavit?
A Not that I recall.
Q It would have been against his interest in that lawsuit for you to have told the truth, would it not?
A I'm not really comfortable—I mean, I can tell you what would have been in my best interest, but I--
Q But you didn't file the affidavit for your best interest, did you?
A Uh, actually, I did.
Q To avoid testifying.
A Yes.
Q But had you testified truthfully, you would have had no--certainly, no legal implications--it may have been embarrassing, but you would have not had any legal problems, would you?

A That's true.

Q Did you discuss anything else that night in terms of--I would draw your attention to the cover stories. I have alluded to that earlier, but, uh, did you talk about cover story that night?

A Yes, sir.

Q And what was said?

A Uh, I believe that, uh, the President said something--you can always say you were coming to see Betty or bringing me papers.

Q I think you've testified that you're sure he said that that night. You are sure he said that that night?

A Yes.

Q Now, was that in connection with the affidavit?

A I don't believe so, no.

Q Why would he have told you you could always say that?

A I don't know.

MR. BURTON: Objection. You're asking her to speculate on someone else's testimony.

MR. BRYANT: Let me make a point here. I've been
very patient in trying to get along, but as I alluded to earlier, and I said I am not going to hold a hard line to this, but I don’t think the President’s—the witness’ lawyers ought to be objecting to this testimony. If there’s an objection here, it should come from the White House side, nor should they be—

SENATOR DeWINE: Counsel, why don’t you rephrase the question?

MR. BRYANT: Do we have a clear ruling on whether they can object?

SENATOR DeWINE: We’ll go off the record for a moment.

THE VIDEOGRAPHER: We’re going off the record at 11:20 a.m.

[Recess.]

THE VIDEOGRAPHER: We are going back on the record at 11:30 a.m.

SENATOR DeWINE: We are now back on the record.

It’s our opinion that counsel for Ms. Lewinsky do have the right to make objections. We would ask them to be as short and concise as humanly possible. So we will now proceed.

Mr. Bryant?

MR. BRYANT: Thank you, Senator.

BY MR. BRYANT:
Q. Let's kind of bring this back together again, and I'll try to ask sharper questions and avoid these objections.

We're at that point that we've got a telephone conversation in the morning with you and the President, and he has among other things mentioned to you that your name is on the Jones witness list. He has also mentioned to you that perhaps you could file an affidavit to avoid possible testifying in that case. Is that right?

A. Correct.

Q. And he has also, I think, now at the point that we were in our questioning, referenced the cover story that you and he had had, that perhaps you could say that you were coming to my office to deliver papers or to see Betty Currie; is that right?

A. Correct. It was from the entire relationship, that story.

Q. Now, when he alluded to that cover story, was that instantly familiar to you?

A. Yes.

Q. You knew what he was talking about?

A. Yes.

Q. And why was this familiar to you?

A. Because it was part of the pattern of the relationship.
Q Had you actually had to use elements of this cover story in the past?
A I think so, yes.
Q Did the President ever tell you what to say if anyone asked you about telephone conversations that you had had with him?
A Are we--are we still focused on December 17th?
Q No, no.
A Okay.
Q It did not have to be that night. Did he ever?
A If I could just--I--I'm pretty date-oriented, so if you could just be more specific with the date. If we're staying on a date or leaving that date, it would just help me. I'm sorry.
Q Well, my question was phrased did he ever do that, but--
A Okay.
Q Well, I--I'm sorry. I'm playing guessing games with you. Was there a conversation on March 29th of 1997 when the President told you he thought perhaps his telephone conversations were being taped or taped--either way, or both--by a foreign embassy?
A Yes.
Q And was there some reference to some sort of cover story there in the event that his line was tapped?
A Yes.
Q And what was that?
A That--I think, if I remember it correctly, it was that we--that he knew that we were sort of engaging in those types of conversations, uh, knowing that someone was listening, so that it was not for the purposes that it might have seemed.
Q Did you find it a little strange that he would express concern about possible eavesdropping and still persist in these calls to you?
A I don't think phone calls of that nature occurred and happened right after, or soon after that discussion. I think it was quite a few months until that resumed.
Q I think my question was more did you not find it a little strange that he felt that perhaps his phone was being tapped and conversations taped by a foreign embassy, and he--
A I--I thought it was strange, but if--I mean, I wasn't going to question what he was saying to me.
Q But that he also continued to make the calls--you're saying he didn't make any calls after that?
A No. My understanding was it was referencing a certain type of phone call, certain nature of phone call, uh, and those--
Q Let me direct your attention back to a point I did
not mention a couple---a few days before the December--early
December telephone call, the lengthy telephone call from the
President. We had talked about how that was a heated
correspondence.
A Correct.
Q At---did at some point during that telephone
conversation---did the tone---did the President's tone change
to a more receptive, friendly conversation?
A Yes.
Q Do you know why that happened?
A No, nor do I remember whose tone changed first. I
mean, we made up, so--
Q Okay. Now let me go back again to the December
11th date--I'm sorry--the 17th. This is the conversation in
the morning. What else---was there anything else you talked
about in terms of---other than your name being on the list
and the affidavit and the cover story?
A Yes. I had--I had had my own thoughts on why and
how he should settle the case, and I expressed those
thoughts to him. And at some point, he mentioned that he
still had this Christmas present for me and that maybe he
would ask Mrs. Currie to come in that weekend, and I said
not to because she was obviously going to be in mourning
because of her brother.
Q In--in that---in that relationship with the
President, I think you have expressed in your testimony
somewhere that you weren't necessarily jealous of those
types of people like Kathleen Willey or Paula Jones, and
perhaps you didn't even believe those stories occurred
as—as they alleged.

A That's correct. I don't—I don't know, jealous or
not jealous. I don't think I've testified to my feelings of
jealousy, but the latter half of the question is true.

Q I--I saw it. I mean, it's not a major point. I
thought I saw that in your testimony, that particular word.

A Okay. If I said that, then I--I don't.

Q Was it your belief that the Paula Jones case was
not a valid lawsuit? Was that part of that discussion that
night, or your strategy?

A Uh, can I separate that—that into two questions?

Q Any way, any way you want to.

A Okay. I don't believe it was a valid lawsuit, and
I don't think whether I believed it was a valid lawsuit or
not was the topic of the conversation.

Q Okay, that's a fair answer.

You believe the President's version of the Paula
Jones incident?

A Is that relevant to--

Q I--I just asked you the question.

A I don't believe Paula Jones' version of the story.
Q  Okay, good. That's a fair answer.
   You have testified previously that you tried to
   maintain secrecy regarding this relationship--and we're
   talking about obviously with the President. Is that true?
A  Yes.
Q  And to preserve the secrecy and I guess advance
   this cover story, you would bring papers to the President
   and always use Betty Currie for the excuse for you to be
   WAV'd in. Is that right?
A  Papers when I was working at the White House and
   Mrs. Currie after I left the White House. So Mrs. Currie
   wasn't involved when I was working at the White House.
Q  Were these papers you carried in to the
   President--were they--were they business documents, or were
   they more personal papers from you to him?
A  They--they weren't business documents.
Q  So, officially, you were not carrying in official
   papers?
A  Correct.
Q  You were carrying in personal papers that would
   not have entitled you ordinarily to go see the President?
A  Correct.
Q  When--in this procedure where Betty Currie was
   always the one that WAV'd you in to the White House--and
I--I don't know if the people who may be watching this
deposition, the Senators, understand that the WAVES process
is just the--to give the guards the okay for you to come in.
Is that a short synopsis?
A I'm not really versed on--
Q I'm not either. You know more than I do,
probably, since you worked there, but--
A Well, I know you had to go, you had to type in a
thing in at WAVES, and now you have to give a Social
Security, birth date, have to show ID.
Q Is there a record kept of that?
A I believe so.
Q Was it always Betty Currie that WAVE'd you in to
the--access to the White House? I'm talking about now after
you left and went to work at the Pentagon.
A No.
Q Other people did that?
A There were other reasons that I came to the White
House at times.
Q Did you ever ask the President if he would WAVE
you in?
A Yes.
Q Did he ever do that?
A No, not to my--not to my knowledge.
Q Was there a reason? Did he express anything to
you why he would or would not?
A Yes. He said that, uh--I believe he said
something about that there's a specific list made of people
that he requests to come in and--and there are people who
have access to that list.
Q So, obviously, he didn't want your name being on
that list?
A Correct.
Q Now, some of those people--
A I think--well, that's my understanding.
Q Would some of those people be the people that
worked outside his office, Ms. Lieberman and those--those
folks?
A I--I believe so, but I'm not really sure.
Q Did you not want those people to know that you
were inside the White House?
A I didn't.
Q Why is that?
A Because they didn't like me.
Q Would they have objected, do you think--if you
know.
A I don't know.
Q Did you work with Betty Currie on occasions to--to
get in to see the President, perhaps bypass some of these
people?
A Yes.
Q And that would be another way that you would conceal the meeting with the President, by using Betty Currie to get you in?
A I--I think, yes, be cautious of it.
Q Did--well, I think we've covered that, about some papers, and I think we've covered that after you left your job inside the White House with Legislative Affairs and went to the Pentagon, you developed a story, a cover story to the effect that you were going to see Betty, that's how you would come in officially?
A Correct.
Q And during that time that you were at the Pentagon, you would more likely visit him on weekends or during the week? Which would--which would--
A Weekends.
Q Weekends. And why--why the weekends?
A First, I think he had less work, and second of all, there were--I believe there were less people around.
Q Now, whose idea was it for you to come on weekends?
A I believe it was the President's.
Q When you--when the President was in his office, was your purpose to go there and see him? If he was in the office, you would go see him?
A What--I'm sorry.
Q No—that’s not clear. I’ll withdraw that question.

Was Ms. Currie, the President’s secretary—was she in the loop, so to speak, in keeping this relationship and how you got in and out of the White House, keeping that quiet?

A I think I actually remember reading part of my grand jury testimony about this and that it was more specific in that she was in the loop about my friendship with the President, but I just want to not necessarily—there was a clarification, I believe, in that about knowledge of the complete relationship or not. So—

Q She would help with the gifts and notes and things like that—the passing?

A Yes.

Q Would you agree that these cover stories that you’ve just testified to, if they were told to the attorneys for Paula Jones, that they would be misleading to them and not be the whole story, the whole truth?

A They would—yes, I guess misleading. They were literally true, but they would be misleading, so incomplete.

Q As I understand your testimony, too, the cover stories were reiterated to you by the President that night on the telephone—

A Correct.
Q  --and after he told you you would be a witness--or
your name was on the witness list, I should say?
A  Correct.
Q  And did you understand that since your name was on
the witness list that there would be a possibility that you
could be subpoenaed to testify in the Paula Jones case?
A  I think I understood that I could be subpoenaed,
and there was a possibility of testifying. I don't know if
I necessarily thought it was a subpoena to testify, but--
Q  Were you in fact subpoenaed to testify?
A  Yes.
Q  And that was what--
A  December 19th, 1997.
Q  December 19th.

Now, you have testified in the grand jury. I
think your closing comments was that no one ever asked you
to lie, but yet in that very conversation of December the
17th, 1997 when the President told you that you were on the
witness list, he also suggested that you could sign an
affidavit and use misleading cover stories. Isn't that
correct?
A  Uh--well, I--I guess in my mind, I separate
necessarily signing affidavit and using misleading cover
stories. So, does--
Q  Well, those two--
A  Those three events occurred, but they don't--they weren't linked for me.
Q  But they were in the same conversation, were they not?
A  Yes, they were.
Q  Did you understand in the context of the conversation that you would deny the--the President and your relationship to the Jones lawyers?
A  Do you mean from what was said to me or--
Q  In the context of that--in the context of that conversation, December the 17th--
A  I--I don't--I didn't--
Q  Okay. Let me ask it. Did you understand in the context of the telephone conversation with the President that early morning of December the 17th--did you understand that you would deny your relationship with the President to the Jones lawyers through use of these cover stories?
A  From what I learned in that--oh, through those cover stories, I don't know, but from what I learned in that conversation, I thought to myself I knew I would deny the relationship.
Q  And you would deny the relationship to the Jones lawyers?
A  Yes, correct.
Q  Good.
A: If—if that’s what it came to.
Q: And in fact you did deny the relationship to the
Jones lawyers in the affidavit that you signed under penalty
of perjury; is that right?
A: I denied a sexual relationship.
Q: The President did not in that conversation on
December the 17th of 1997 or any other conversation, for
that matter, instruct you to tell the truth; is that
correct?
A: That’s correct.
Q: And prior to being on the witness list, you—you
both spoke—
A: Well, I guess any conversation in relation to the
Paula Jones case. I can’t say that any conversation from
the—the entire relationship that he didn’t ever say, you
know, "Are you mad? Tell me the truth." So—
Q: And prior to being on the witness list, you both
spoke about denying this relationship if asked?
A: Yes. That was discussed.
Q: He would say something to the effect that—or you
would say that—you—you would deny anything if it ever came
up, and he would nod or say that’s good, something to that
effect; is that right?
A: Yes, I believe I testified to that.
Q: Let me shift gears just a minute and ask you
about--and I'm going to be delicate about this because I'm conscious of people here in the room and my--my own personal concerns--but I want to refer you to the first so-called salacious occasion, and I'm not going to get into the details. I'm not--

Q  Okay.

A  Can--can we--can you call it something else?

A  I mean, this is--this is my relationship--

Q  What would you like to call it?

A  --so, I mean, is--

Q  This is the--or this was--

A  It was my first encounter with the President, so I don't really see it as my first salacious--that's not what this was.

Q  Well, that's kind of been the word that's been picked up all around. So--

A  Right.

Q  --let's day on this first--

A  Encounter, maybe?

Q  Encounter, okay.

A  Okay.

Q  So we all know what we're talking about. You had several of these encounters, perhaps 10 or 11 of these encounters; is that right?

A  Yes.
Q  Okay. Now, with regard to the first one on
November the 15th, 1995, you have testified to a set of
facts where the President actually touched you in certain
areas--is that right--and that's--that's where I want to go.
That's as far as I want to go with that question.

MR. CACHERIS: If that's as far as it goes, we
will not object--

MR. BRYANT: Okay.

MR. CACHERIS: --and if it goes any further, we
will object.

MR. BRYANT: Okay.

BY MR. BRYANT:

Q  You have testified to that?
A  Yes.

Q  And I have the excerpts out, and I don't--but
they've been adopted and affirmed as true. So I'm not going
to get--get you looking at--have you read those excerpts.
A  I appreciate that.

Q  Now, in the--in later testimony before the grand
jury, you were given a definition, and in fact it was the
same definition that was used in the Paula Jones lawsuit, of
"sexual relations." Do you recall the--
A  So I've read.

Q  Yes.
A  I was not shown that definition.
Q  But you were asked a question that incorporated
that definition.
A  Not prior to this whole—not prior to the
Independent Counsel getting involved.
Q  But--no--it was the Independent Counsels
themselves who asked you this question.
A  Right. Oh, so you're--you're saying in the grand
court, I was shown a definition of--
Q  Right.
A  Yes, that's correct.
Q  And you admitted in that answer to that question
that the conduct that you were involved in, the encounter of
November the 15th, 1995, fit within that definition of
'sexual relations'?
A  The second encounter of that evening did.
Q  Right.
And were there other similar encounters later on
with the President, not that day, but other occasions that
would have likewise fit into that definition of "sexual
relations" in the Paula Jones case?
A  Yes. And--yes.
Q  There was more than one occasion where that
occurred?
A  Correct.
Q  So, if the President testifies that he did not--he
was not guilty of having a sexual relationship under the Paula Jones definition even, then that testimony is not truthful, is it?

MR. CACHERIS: Objection. She should not be called upon to testify what was in the mind of another person. She's testifying to the facts, and she has given the facts.

MR. BRYANT: I would ask that she answer the question.

SENATOR DeWINE: Go ahead.

SENATOR LEAHY: The objection is noted for the record.

SENATOR DeWINE: The objection is noted. She may answer the question.

THE WITNESS: I--I really--

SENATOR LEAHY: If she can.

THE WITNESS: --don't feel comfortable characterizing whether what he said was truthful or not truthful. I know I've testified to what I believe is true.

BY MR. BRYANT:

Q Well, truth is not a wandering standard.

A Well--

Q I would hope not. But you have testified, as I've told you, that what you and he did together on November the 15th, 1995 fit that definition of the Paula Jones, and
you’ve indicated that there were other occasions that
likewise--
A    Yes, sir.
Q    --that that occurred.
But now the President has indicated as a part of
his specific defense--he has filed an answer with this
Senate denying that this occurred, that he did these
actions.
A    I know. I’m not trying to be difficult, but there
is a portion of that definition that says, you know, with
intent, and I don’t feel comfortable characterizing what
someone else’s intent was.
I can tell you that I--my memory of this
relationship and what I remember happened fell within that
definition.
If you want to--I don’t know if there’s another
way to phrase that, but I’m just not comfortable commenting
on someone else’s intent or state of mind or what they
thought.
Q    Let’s move forward to December the 19th, 1997, at
that point you made reference to earlier.
A    I’m sorry. Can you repeat the date again? I’m
sorry.
Q    Yes. December the 19th, 1997.
A    Okay, sorry.
Q  At that point where you testified that you received a subpoena in the Paula Jones case, and that was, of course, on December the 19th, 1997.

Do you recall the specific time of day and where you were when you were served with the subpoena?

A  I was actually handed the subpoena at the Metro entrance of the Pentagon--at the Pentagon, and the time--I think it was around 4:30--4--I--I--if I've testified to something different, then, I accept whatever I testified to, closer to the date. Sometime in the late afternoon.

Q  Did they call you, and you had to come out of your office and go outside--

A  Correct.

Q  --and do that?

Okay. And what did you do after you accepted service of the subpoena?

A  I started crying.

Q  Did he just give it to you and walk away, or did he give you any kind of explanation?

A  I think I made a stink. I think I was trying to hope that he would convey to the Paula Jones attorneys that I didn't know why they were doing this, and this is ridiculous, and he said something or another, there is a check here for witness fee. And I said I don't want their stinking money, and so--
Q What did you do after, after you got through the emotional part?
A I went to a pay phone, and I called Mr. Jordan.
Q Any reason you went to a pay phone, and why did you call Mr. Jordan? Two questions, please.
A First is because my office in the Pentagon was probably a room this size and has--let's see, one, two, three, four--four other people in it, and there wasn't much privacy. So that I think that's obvious why I wouldn't want to discuss it there.
   And the second question was why Mr. Jordan--
Q Why did you call Mr. Jordan; yes.
A Because I couldn't call Mrs. Currie because it was--I hadn't expected to be subpoenaed that soon. So she was grieving with her brother's passing away, and I didn't know who else to turn to. So--
Q And what--what occurred with that conversation with Mr. Jordan?
A Well, I remember that--that he couldn't understand me because I was crying. So he kept saying: "I don't understand what you're saying. I don't understand what you're saying."
   And I just was crying and crying and crying. And so all I remember him saying was: "Oh, just come here at 5 o'clock."
So I did.

Q  You went to see Mr. Jordan, and you were inside his office after 5 o'clock, and you did—is that correct?
A  Yes.
Q  Were--were you interrupted, in the office?
A  Yes. He received a phone call.
Q  And you testified that you didn’t know who that was that called?
A  Correct.
Q  Did you excuse yourself?
A  Yes.
Q  What--after you came back in, what--what occurred?

Did he tell you who he had been talking to?
A  No.
Q  Okay. What happened next?
A  I know I’ve testified about this--
Q  Yes.
A  --so I stand by that testimony, and my recollection right now is when I came back in the room, I think shortly after he had placed a phone call to--to Mr. Carter’s office, and told me to come to his office at 10:30 Monday morning.

Q  Did you know who Mr. Carter was?
A  No.
Q  Did Mr. Jordan tell you who he was?
A No--I don't remember.
Q Did you understand he was going to be your attorney?
A Yes.
Q Did you express any concerns about the subpoena?
A I think that happened before the phone call came.
Q Okay, but did you express concerns about the subpoena?
A Yes, yes.
Q And what were those concerns?
A In general, I think I was just concerned about being dragged into this, and I was concerned because the subpoena had called for a hatpin, that I turn over a hatpin, and that was an alarm to me.
Q How--in what sense was it--in what sense was it an alarm to you?
A The hatpin being on the subpoena was evidence to me that someone had given that information to the Paula Jones people.
Q What did Mr. Jordan say about the subpoenas?
A That it was standard.
Q Did he have any--did he have any comment about the specificity of the hatpin?
A No.
Q And did you--
A He just kept telling me to calm down.
Q Did you raise that concern with Mr. Jordan?
A I don’t remember if—if I’ve testified to it, then yes. If--I don’t remember right now.
Q Did--would you have remembered then if he made any comment or answer about the hatpin?
A I mean, I think I would.
Q And you don’t remember?
A I--I remember him saying something that it was—you know, calm down, it’s a standard subpoena or vanilla subpoena, something like that.
Q Did you ask Mr. Jordan to call the President and advise him of the subpoena?
A I think so, yes. I asked him to inform the President. I don’t know if it was through telephone or not.
Q And you did that because the President had asked you to make sure you let Betty know that?
A Well, sure. With Betty not being in the office, I couldn’t--there wasn’t anyone else that I could call to get through to him.
Q Did Mr. Jordan say to you when he might see the President next?
A I believe he said he would see him that evening at a holiday reception.
Q Did Mr. Jordan during that meeting make an inquiry about the nature of the relationship between you and the President?
A Yes, he did.
Q What was that inquiry?
A I don't remember the exact wording of the questions, but there were two questions, and I think they were something like did you have sex with the President or did he—and if—or did he ask for it or some—something like that.
Q Did you—what did you suspect at that point with these questions from Mr. Jordan in terms of did he know or not know about this?
A Well, I wasn't really sure. I mean, two things. I think there is—I know I've testified to this, that there was another component to all of this being Linda Tripp and her—what she might have led me to believe or led me to think and how that might have characterized how I was perceiving the situation.
I—I sort of felt that I didn't know if he was asking me as what are you going to say because I—I don't know these answers to these questions, or he was asking me as I know the answer to these questions and what are you going to say. So, either way, for me, the answer was no and no.
Q And that's just what I wanted to ask you—you did
answer no to both of those, but--

A Yes.

Q --as you explained--you didn't mention this
directly, but you mentioned in some of your earlier
testimony about it, that this was kind of a wink and--you
thought this might be a wink-and-nod conversation, where he
really knew what was going on, but--

A Well, I think that's what I just said.

Q --he was testing you to see what you would say?

A --that I wasn't--I--that was one of the--that was
one of the things that went through my mind. I mean, it was
not--I think that's what I just testified to, didn't it?

Q You didn't use the term "wink-and-nod," though.

A Oh.

Q Did you have any conversation with Mr. Jordan
during that meeting about the specifics of an affidavit?

A No.

Q Do you know if the subject of an affidavit even
came up?

A I don't think so.

Q What happened next? Is that when he made the call
to Mr. Carter, after this conversation?

A No. He made the call to Mr.--I think--well, I
think he made the call to Mr. Carter, uh, shortly after I
came back into the room, but I could be wrong.
Q And then the meeting concluded after that--after the appointment was set up with Mr. Carter, the meeting concluded?

A Yes.

SENATOR DeWINE: Mr. Bryant, we’re going to need to break sometime in the next 5 minutes. Is this a good time, or do you want to complete--

MR. BRYANT: This is a good time.

SENATOR DeWINE: Okay. We’ll take a 5-minute break.

THE VIDEOGRAPHER: We’re going off the record at 12:04 p.m.

[Recess.]

THE VIDEOGRAPHER: We are going back on the record at 12:16 p.m.

SENATOR DeWINE: We are back on the record. Let me advise House Managers that they have consumed one hour and 54 minutes.

Mr. Bryant, you may proceed.

MR. BRYANT: Thank you, sir.

BY MR. BRYANT:

Q Ms. Lewinsky, let me just cover a couple of quick points, and then I’ll move on to another area, at least the next meeting with Mr. Jordan and eventual meeting with Mr. Carter.
Back when issues of—we were discussing the issues of cover stories, uh, would you tell me about the, uh, code name with Betty Currie, the President's secretary and how that worked in terms of the use—I guess the word "Kay," the name "Kay," and were there other code names, and when did this start?

A  Sure. First, let me say there's—from my experience with working with Independent Counsel on this subject area, there—my initial memory of things and then what I came to learn from, from other evidence, I think, are sort of two different things. So I initially hadn't remembered when that had happened or what had happened.

The name "Kay" was used because Betty and I first came to know each other and know—or, I guess I came to know of Mrs. Currie through Walter Kaye, who was a family friend, and I think that that—I don't remember when we started using it, but I know that by January at some point—by let's just say January, I think, 12th or 13th, we were doing that. So I know I was beyond paranoid at this point.

Q  Was "Kay" your code name, so to speak?

A  I believe—yes, yes. So she was "Kay" and I was "Kay."

Q  So any time, uh—not any time—so you used the "Kay" name interchangeably between the two—just between the two of you?
Q And, uh, when we're talking about that Ms. Currie would WAVE you into the White House, would that occur when the President was there? I mean, you went in--
A There--there were times that I went to see Mrs. Currie when the President wasn't there.
Q Right. And she would WAVE you in.
A Correct.
Q And there were times other people WAVE'd you in when the President wasn't there?
A Correct.
Q But when the President was there, and you were going to see the President, Ms. Currie was the one that always WAVE'd you in?
A Yes, and I think, unless--maybe on the occasions of the radio address or it was an official function.
Q Now, I think we talked a little bit about this. During your December the 19th meeting with Mr. Jordan, uh, he did schedule you a time to meet, uh, and introduce you to Mr. Carter?
A Correct.
Q And that--when was that meeting with Mr. Carter scheduled?
A Uh, I believe for--it was Monday morning. I think it was 11 o'clock, around--sometime around that time.
Q  And my notes say that would have been December the
  22nd, 1997.
A  Correct.
Q  Did you, uh, call to meet him earlier, and if so,
  why?
A  Yes. I had--I had had some concerns over the
  weekend that I didn't know if--if Mr. Jordan knew about the
  relationship or didn't know about the relationship. I was
  concerned about--I'm sure you can understand that I was
  dealing with a set of facts that were very different from
  what the President knew about being pulled into this case in
  that I had, in fact, disclosed information. So I was very
  paranoid, and, uh, I, uh, I--I was trying to--trying to see
  what Mr. Jordan knew was--was trying to inform him, was
  trying to just get a better grasp of what was going on.
  Is that--is that clear? No?
Q  You were--you were worried that Mr. Jordan didn't
  have a-- did not have a grasp of what was really going on?
A  Correct.
Q  And that would be in terms of actually knowing the
  real relationship between you and the President?
A  Correct.
Q  So how did you attempt to correct that?
A  Well, I--I sort of--I think the way it came up was
  I said, uh--I think I said to Mr. Jordan--I know I've
testified to this, uh, that--something about what about if
someone overheard the phone calls that I had with him. And
Mr. Jordan, I believe, said something like: So what? The
President's allowed to call people.
And then--well.

Q Now, was this at a meeting on December the 22nd,
before you went to see Mr. Carter?
A Correct.
Q I assume you--you went to Mr. Jordan's office
first, and then he was going to escort you over and turn you
over to Mr. Carter?
A Correct.
Q And it was at that meeting that you brought up the
possibility of someone overhearing a conversation with the
President and you--between the two of you?
A Yes.
Q What else was said at that meeting with Mr.
Jordan?
A I think it covered a topic that I thought we
weren't discussing here.
Q Uh, okay. All right. I'm not sure.
A Okay. Well, I--I know I've testified to this in
my--I think in all three, if not both of my grand jury
appearances, and I'm very happy to stand by that testimony.
Q All right. I'm going to go around this a little
bit without getting into details. You had a conversation  
with Mr. Jordan to detail—to give him more specific details  
of your relationship with the President.  
A Uh, to give him more details of some of the types  
of phone calls that we had.  
Q Okay. Uh, did you ask Mr. Jordan had he spoken  
with the President during that conversation?  
A Yes, I believe so.  
Q And why was this—why did you need to know that,  
or why was it important that you know that?  
A I wanted the President to know I'd been  
subpoenaed.  
Q Did, uh—in your, uh, proffer, you say that you  
made it clear to Mr. Jordan that you would deny the sexual  
relationship. Do you recall saying that in your proffer?  
A Uh, I know—I know that was written in my proffer.  
Q Okay. Well, I guess the better question is did  
you—did you in fact make that clear to Mr. Jordan that you  
would deny a sexual relationship with the President?  
A I—I'm not really sure. I--this is sort of an  
area that, uh, has been difficult for me. I think, as I  
might have discussed in the grand jury, that when I  
originally wrote this proffer, it was to be a road map and,  
really, something to help me to get immunity and not  
necessarily—it's not perfect.
Uh, so, I think that was my intention--I know that was my intention or at least what I thought I was doing—but I never really thought that this would become the be-all and end-all, my proffer.

Q Did, uh, did you bring with you to the meeting with Mr. Jordan, and for the purpose of carrying it, I guess, to Mr. Carter, items in response to this request for production?

A Yes.

Q Did you discuss those items with Mr. Jordan?

A I think I showed them to him, but I’m not 100 percent sure. If I’ve testified that I did, then I’d stand by that.

Q Okay. How did you select those items?

A Uh, actually, kind of in an obnoxious way, I guess. I--I felt that it was important to take the stand with Mr. Carter and then, I guess, to the Jones people that this was ridiculous, that they were--they were looking at the wrong person to be involved in this. And, in fact, that was true. I know and knew nothing of sexual harassment. So I think I brought the, uh, Christmas cards, that I’m sure everyone in this room has probably gotten from the President and First Lady, and considered that correspondence, and some innocuous pictures and--they were innocuous.

Q Were they the kind of items that typically, an
intern would receive or, like you said, any one of us might receive?

Q In other words, it wouldn't give away any kind of special relationship?

A Exactly.

Q And was that your intent?

A Yes.

Q Did you discuss how you selected those items with anybody?

A I don't believe so.

Q Did Mr. Jordan make any comment about those items?

A No.

Q Were any of these items eventually turned over to Mr. Carter?

A Yes.

Q And did you tell Mr. Jordan at that meeting that morning that these were not all of the gifts?

A I think I--I know I sort of alluded to that in my proffer, and I don't, uh--it's possible. I don't have a specific recollection of that.

Q And do you have a recollection of any response he may have made if you said that?

A No.

Q That--did you tell Mr. Jordan that day that the,
uh, President gave you a hatpin and that the hatpin was
mentioned in the subpoena?
A No.
Q Did you discuss the hatpin with Mr. Jordan?
A On the 22nd?
Q Yes.
A No.
Q Any other time?
A Yes.
Q When was that?
A On the 19th.
Q Okay, and what was--I think I may have missed
that, going through that. Tell me about it.
A Actually, I think we--we went through it.
Q You just maybe mentioned it.
A I mentioned it when I first mentioned to him the
subpoena that the hatpin had concerned me.
Q What was the significance of that hatpin to you?
That seems to stand out. Was that--was that a--
A Right. I think, as I mentioned before, it was an
alarm to me because it was a specific item--
Q Right.
A --in this list of generalities--I don't know
generalities, but of general things--you sort of go--hatpin?
Q Right. I recall that, but I--I think my question
was, was it of any special significance to you.
A  Sure.
Q  Was it, like, the first gift or something, that it
really stood out above the others?
A  Yes. It--it was--it was the first gift he gave
me. It was a thoughtful gift. It was beautiful.
Q  And was the hatpin in that list, that group of
items that you carried to surrender to Mr. Carter?
A  No.
Q  And the hatpin was not in that list of items that
you showed Mr. Jordan?
A  I--I didn't show Mr. Jordan a list of items.
Q  No--I thought you said you showed him the items.
A  Correct.
Q  And the hatpin was not in that group--I may have
"list"--
A  Oh.
Q  --but the hatpin was not in that group of items--
A  No, it was not.
Q  --that you showed Mr. Jordan. Okay.
Tell us, if you would, how you arrived at Mr.
Carter's. I know you wrote in a car, but Mr. Jordan was
with you--
A  Yes.
Q  --you went in--and tell us what happened.
A  Uh, in the car, we spoke about job things. I know
he mentioned something about, I think, getting in touch with
Howard Pastor, and I mentioned to Mr. Jordan that Mr. Bacon
knew Mr. Pastor and had already gotten in touch with him,
and so he should--I just wanted Mr. Jordan to be aware of
that.

Uh, we talked about--it was really all about the
job stuff because Mr. Jordan--the man driving the car--I
didn’t want to discuss anything with the case.

Q  But once you arrived, and Mr. Jordan made the
introduction--

A  Correct.

Q  --between the two of you. And did he explain to
Mr. Carter your situation, or did he go beyond just the
perfunctory introduction?

A  No.

Q  Did he leave?

A  Yes.

Q  Did you, uh--I guess, generally, what did you
discuss with Mr. Carter?

A  The same vanilla story I had kind of--well,
actually, not even that. I discussed with Mr. Carter the,
uh, that this was ridiculous, that I was angry, I didn’t
want to be involved with this, I didn’t want to be
associated with Paula Jones, with this case.
Q: Did you, uh--
A: I asked if I could sue Paula Jones. [Laughing.]
Q: Did you discuss an affidavit?
A: Yes, I believe I mentioned an affidavit.
Q: Did you mention, uh, the, uh--well, was there
discussion about how you could sign an affidavit that might
be--allow you to skirt being called as a witness?
A: Mr. Carter said that was a possibility but that
there were other things that we should try first; that he,
ugh, thought--well, actually, can I ask my attorneys a
question for a moment?

MR. BRYANT: Uh, sure.

[Witness conferring with counsel.]

SENATOR DEMING: Counsel, Ms. Lewinsky's mike is
carrying; it's picking up, so we don't want to--

THE WITNESS: Sorry. I was only saying nice
things about you all.

SENATOR DEMING: Thank you.

[Laughter.]

MR. CACHERIS: So that you'll know what we're
discussing here, as you know, Ms. Lewinsky is not required
to give up her lawyer-client privileges, and the question we
don't know the answer to and would like to address after
lunch is whether in fact Mr. Carter has testified to this
conversation.
Therefore, perhaps--

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

MR. CACHERIS: Or come back.

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

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

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

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

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

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

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

MR. BRYANT: Well, I'm not sure I can stay in this area too far without other questions that might arguably be involved in that privilege. I can ask them, and you can
object if you think they're within that range.

    MR. CACHERIS: Well, as I said, it's our
understanding that under her agreement with the Independent
Counsel, she has not been required to waive her lawyer-
client privilege, and we don't want to do so here. That's
that simple. And, Mr. Bryant, I want to check to see if Mr.
Carter has testified about this. If he has, then we might
be objecting--

    MR. BRYANT: Well, she has already, I think,
waived that privilege through talking with the FBI and those
folks. I mean, we have statements that concern those
conversations--

    SENATOR DEWINE: Well, let's, instead of

    MR. BRYANT: And the 302's.

    SENATOR DEWINE: Counsel, let me just—if I could
interrupt both of you, to keep moving here, Mr. Bryant, you
have a choice. You can continue on this line of
questioning, and we will have to deal with that, or you can
move off of it, and in 20 minutes we'll be at a lunch break
and then we can try to resolve that.

    MR. BRYANT: To be clear and fair, let's just--let
me postpone the rest of this--

    SENATOR DEWINE: That will be fine.

    MR. BRYANT: —exam, and we'll move over to
December 28th, and we'll come back if it's appropriate.
SENATOR DEWING: That will be fine.

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

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

Let's talk a minute--I just don't want to forget
to do this; unless I make notes, I forget.

SENATOR LEAHY: You've got enough people here
making notes; I don't think it'll be--I don't think it'll be
forgotten.

BY MR. BRYANT:

Q We're going to move in the direction of the
December 28th, 1997 meeting, and I'm going to ask you at
some point did you meet with the President later in
December.

A Yes.

Q Okay, and what date was that?

A December 28th, 1997.

Q Thank you. How did the meeting come about?

A Uh, I contacted Mrs. Currie after Christmas and
asked her to find out if the President still wanted to give
me his Christmas present, or my Christmas present.

Q Did Ms. Currie get back to you?

A Yes, she did.

Q And what was her response?
A To come to the White House at 8:30 a.m. on the 26th.

Q And that would have been Sunday?

A Yes.

Q Did you in fact go to the White House on that date?

A Yes.

Q And how did you get in?

A I believe the Southwest Gate.

Q Did Ms. Currie WAVE you in?

A I think so.

Q You've testified to that previously.

A Okay, then I accept that.

Q This, uh, meeting on the 26th was a Sunday, and Ms. Currie--again, according to your prior testimony--WAVED you in. This was all consistent with what the President had told you to do about number one, coming on weekends; is that correct?

A I--I--I don't think me coming in on that Sunday had--I mean, for me, my memory of it was that it was a holiday time, so it could have been any day. It's pretty quiet around the White House from Christmas to New Year's.

Q And it would have been consistent with her WAVING you in when she was there at work on Sunday?

A Yes.
Q. That was unusual, though, for her to be in on Sunday, wasn't it?

A. I—I—I think so, but I mean, that's her—I think that's something you'd have to ask her.

MR. BRYANT: I'm concerned about the time. I'm going to go ahead and continue with this, and we'll just stop wherever we have a—whenever you tell us to stop. This will take a little bit longer than another 15 minutes or so; but it's appropriate, I think, for us to continue.

SENATOR DEWINE: Well, frankly, it's up to you.

MR. BRYANT: Okay.

SENATOR DEWINE: Do you have a problem in breaking it?

MR. BRYANT: No; no, I don't think so.

SENATOR DEWINE: I mean, if you do, we can take lunch now. I'll leave that up to you.

MR. BRYANT: Uh, why don't we take the lunch now—

SENATOR DEWINE: All right. No one has any objection to that, we will do that.

THE WITNESS: I never object to food.

SENATOR DEWINE: Let me just announce to counsel you have used 2 hours and 14 minutes. It is now 20 minutes until 1. We'll come back here at 20 minutes until 2. And we need during this break also to see counsel and try to resolve the other issue prior to going back in. This is the
privilege issue.

SENATOR LEARY: Did counsel for Ms. Lewinsky have
to make a couple phone calls first, before we have that
discussion? I think--

SENATOR DeWINE: My suggestion would be we do that
at the last 15 minutes of the break.

SENATOR LEARY: I think he said he wanted to call
Mr. Carter; that's why--

MR. CACHERIS: Meet you back up here?

SENATOR DeWINE: Yes. I would also--the sergeant-
at-arms has asked me to announce that the food is on this
floor, and since we have a very limited period of time, we
suggest you try to stay on the floor.

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

SENATOR DeWINE: Except--I understand. I know
that you're--

MR. CACHERIS: We have our own arrangements.

SENATOR DeWINE: I know that you have your room,
and you've made your own arrangements, and that's fine.
So we will start back in one hour.

THE VIDEOPHOTOGRAPHER: We are going off the record at
12:39 p.m.
[Whereupon, at 12:39 p.m., the deposition was
recessed, to reconvene at 1:39 p.m. this same day.]
THE VIDEOGRAPHER: We are going back on the record at 13:43 hours.

SENATOR DeWINE: We are now back on the record.

As we broke for lunch, there was an objection that had been made by Ms. Lewinsky’s counsel. Let me call on them at this point for statements.

MR. CACHERIS: Yes. We have examined the record during the course of the break, and while we know that the immunity agreement does provide for Ms. Lewinsky to maintain her lawyer-client privilege, we think in this instance, the matter has been testified so fully that it has been waived.

So the objection that we lodged is withdrawn.

SENATOR DeWINE: Thank you very much.

Mr. Bryant, you may proceed.

MR. BRYANT: Thank you, Mr. Senator.

BY MR. BRYANT:

Q We’ve got you to the point where Mr. Jordan has escorted you to Mr. Carter’s office and has departed, and you and Mr. Carter have conversations.

Generally, what did you discuss with Mr. Carter?

A I guess the—the reasons why I didn’t think I should be called in this matter.

Q Did he ask you questions?
A  Yes.
Q  What type of questions did he ask you?
A  Um, they ranged from where I lived and where I was working to did I have a relationship with the President, did—everything in between.
Q  When he—when he asked you about the relationship, did you understand he meant a sexual-type relationship?
A  He asked me questions that—that indicated he was being specific.
Q  And did—did you deny such a relationship?
A  Yes, I did.
Q  Did he ask you questions about if you were ever alone with the President?
A  Yes, he did.
Q  And did you deny that?
A  I think I mentioned that I might have brought the President papers on occasion, may have had an occasion to be alone with him, but not—not anything I considered significant.
Q  But that was not true either, was it?
A  No.
Q  And in fact, that—the fact that you brought him papers, that was part of the cover-up story?
A  Correct.
Q  I'm unclear on a point I want to ask you. Also,
did Mr. Carter ask you about how you perhaps were pulled
into this case, and you gave some answer about knowing Betty
Currie and--and Mr. Kaye? Does that ring bells? You gave
that testimony in your deposition.
A That that's how I got pulled into the case?
Q Right. Did--
A May I see that, please?
Q It's about your denying the relationship with the
President, and you think maybe you got pulled into the case.
It's--certainly, it's--it's in your grand jury--okay.
It's--it's in the August 1 interview, page 9. This was a
302 exam from the FBI.
A Um--
MR. BRYANT: Let me give that to her. Let me just
give it to her to refresh her memory. I'm not going to put
it in evidence, although it's--it should be there.
[Handing document.]
[Witness perusing document.]
THE WITNESS: I don't think that's an accurate
representation of what I might have said in this interview.
BY MR. BRYANT:
Q Okay. Would you--how would you have related
Walter Kaye in that interview? How would his name have come
up?
A In this interview or with Mr. Carter?
Q  Well, in the interview with Mr. Carter that I
assume was sort of summarized in that--
A  Right.
Q  --302, but, yes, with Mr. Carter.
A  Uh, I think I mentioned that I was friendly with
Betty Currie, the President's secretary.
Q  And how would Mr. Kaye's name have come up in the
conversation?
A  Because of how I met Ms. Currie was
through—that's how I came to know of Ms. Currie and--and
first introduced myself to her. Excuse me.
Q  Let's go back now and resume where we were before
the lunch break. We were talking about the December visit
to the White House and the conversation with the President.
You had discussed—well, I think we're to the point where
perhaps you—or I'll ask you to bring up your discussion
with the President about the subpoena and the request for
production.
A  Um, part way into my meeting with the President, I
brought up the concern I had as to how I would have been
put—how I might have been alerted or—not alerted, but how
I was put on the witness list and how I might have been
alerted to the Paula Jones' attorneys, and that that was—I
was sort of concerned about that. So I discussed that a
little, and then I said, um, that I was concerned about the
hatpin. And to the best of my memory, he said that that had
concerned him as well, and--

Q Could he have said that bothered him?
A He--he could have. I--I mean, I don't--I know
that sometimes in the--in my grand jury testimony, they've
put quotations around things when I'm attributing statements
to other people, and I didn't necessarily mean that those
were direct quotes. That was the gist of what I remembered
him saying. So, concern, bothered, it doesn't--

Q Was--was there a discussion at that point as to
how someone might have--may have discovered the--the hatpin
and why?
A Well, he asked me if I had told anybody about it,
and I said no.

Q But the two of you reached no conclusion as to how
that hatpin came--
A No.

Q --to appear on the motion?
A No.

Q Did he appear at all, I think, probably surprised
that--that you had received a request for production of
documents or the--the hatpin was on that document?
A I didn't discuss--we didn't discuss documents,
request for documents, but with regard to the hatpin, um, I
don't remember him being surprised.
Q  Ms-hmm. How long did the discussion last about
the--this request for production of--of the items?
A  The topic of the Paula Jones case, maybe 5
minutes. Not very much.
Q  What else was said about that?
A  About the case?
Q  Yes.
A  There was--then, at some point in this
discussion--I think it was after the hatpin stuff--I had
said to him that I was concerned about the gifts and maybe I
should put them away or possibly give them to Betty, and as
I've testified numerous times, his response was either ranging
from no response to "I don't know" or "let me think about
it."
Q  Did the conversation about the--the gifts that you
just mentioned, did that immediately follow and tie into, if
you will, the conversation about the request for production
of items, the hatpin and so forth? Did one lead to the
other?
A  I don't remember. I know the gift conversation
was subsequent to the hatpin comment, but I--I don't
remember if one led to the other.
Q  What else happened after that?
A  Hmm, I think we went back to sort of--we left that
topic, kind of went back to the visit.
Q Did—which included exchanging the Christmas
gifts?
A Correct.
Q Okay.
A I had already—he had already given me my presents
at this point.
Q Okay. Did—he gave you some gifts that day, and
my question to you is what went through your mind when he
did that, when you knew all along that you had just received
a subpoena to produce gifts. Did that not concern you?
A No, it didn’t. I was happy to get them.
Q All right. Why did it—beyond your happiness in
receiving them, why did the subpoena aspect of it not
concern you?
A I think at that moment—I mean, you asked me when
he gave me those gifts. So, at that moment, when I was
there, I was happy to be with him. I was happy to get these
Christmas presents. So I was nervous about the case, but I
had made a decision that I wasn’t going to get into it too
much--
Q Well--
A --with a discussion.
Q --have you in regards to that—you’ve testified in
the past that from everything that the President had told
you about things like this, there was never any question
that you were going to keep everything quiet, and turning
over all the gifts would prompt the Jones attorneys to
question you. So you had no doubt in your mind, did you
not, that you weren't going to turn these gifts over that he
had just given you?

A Uh, I--I think the latter half of your statement
is correct. I don't know if you're reading from my direct
testimony, but--because you said--your first statement was
from everything the President had told you. So I don't know
if that was--if those were my words or not, but I--no, I
was--I--it--I was concerned about the gifts. I was worried
someone might break into my house or concerned that they
actually existed, but I wasn't concerned about turning them
over because I knew I wasn't going to, for the reason that
you stated.

Q But the pattern that you had had with the
President to conceal this relationship, it was never a
question that, for instance, that given day that he gave you
gifts that you were not going to surrender those to the
Jones attorneys because that would--

A In my mind, there was never a question, no.

Q I'm just actually looking at your deposition on
page--no, I'm sorry--your grand jury proceedings of August
the 6th, just to be clear, since you raised that question.

1004 in the book, appendices.
You indicate that in response to a question, "What do you think the President is thinking when he is giving you gifts when there is a subpoena covering gifts. I mean, does he think in any way, shape or form that you're going to be turning these gifts over?" And you answer is, "You know, I can't answer what he was thinking, but, to me, it was--there was never a question in my mind, and I--from everything he said to me, I never questioned him that we were ever going to do anything but keep this private. So that meant deny it, and that meant do whatever appropriate--take whatever appropriate steps needed to be taken, you know, for that to happen, meaning that if--if I had to turn over every gift--if I had turned over every gift he had given me--first of all, the point of the affidavit and the point of everything was to try to avoid a deposition. So where I'd have to sort of--you know, I wouldn't have to lie as much as I would necessarily in an affidavit how I saw it," and you continue on, just one short paragraph.

A  Right.

Q  "So, by turning over all of these gifts, it would at best prompt him to want to question me about what kind of friendship I had with the President, and they would want to speculate and they'd leak it, and my name would be trashed and he would be in trouble."

So you recall giving that testimony?
A Yes. I accept— I accept what's said here.

Q Okay.

A It's a little different from what you said, but very close.

Q Thank you.

Did the President ever tell you to turn over the gifts?

A Not that I remember.

Q Now, is that— does that bring us to the end of this conversation with the President, or did other things occur?

A I think that the aspect of where this case is related, yes.

Q Okay. And then you left, and where did you go when you left the White House?

A I think I went home.

Q This is at— at your apartment?

A My mother's apartment.

Q Mother's apartment.

Did you later that day receive a call from Betty Currie?

A Yes, I did.

Q Tell us about that.

A I received a call from— from Betty, and to the best of my memory, she said something like I understand you
have something for me or I know—I know I've testified to
saying that—that I remember her saying either I know you
have something for me or the President said you have
something for me. And to me, it's a—she said—I mean, this
is not a direct quote, but the gist of the conversation was
that she was going to go visit her mom in the hospital and
she'd stop by and get whatever it was.

Q Did you question Ms. Currie or ask her, what are
you talking about or what do you mean?

A No.

Q Why didn't you?

A Because I assumed that it meant the gifts.

Q Did—did you have other telephone calls with her
that day?

A Yes.

Q Okay. What was the purpose of those
conversations?

A I believe I spoke with her a little later to find
out when she was coming, and I think that I might have
spoken with her again when she was either leaving her house
or outside or right there, to let me know to come out.

Q Do—at that time, did you have the caller
identification—

A Yes, I did.

Q --on your telephone?
A    Yes.
Q    And did you at least on one occasion see her cell
    phone number on your caller-ID that day?
A    Yes, I did.
Q    Now, Ms. Currie has given different versions of
    what happened there, but I recall one that she mentioned
    about Michael Isikoff, that you had called her and said
    Michael Isikoff is calling around or called me--
A    Mm-hmm.
Q    --about some gifts.
    Did Mr. Isikoff ever call you about the gifts?
A    No.
Q    Okay. Would there have been--would there have
    been any reason for you not to have carried the gifts to Ms.
    Currie had you wanted her--had you called her, would you
    have had her come over to get them from you, or does that--
A    Probably not.
Q    I mean, is there--is there any doubt in your mind
    that she called you to come pick up the gifts?
A    I don't think there is any doubt in my mind.
Q    Okay. Let me ask was--I think you did something
    special for her, as I recall, too, or her mother. Did you
    prepare a plant or something for her to pick up?
A    Um, no. I just--
Q    To take to her mother?
A I bought a small plant and a balloon.
Q Okay. What was your understanding about her mother, and was--
A Oh, I--I knew her mom was in--was in the hospital and was sick, and I think this was her second trip to the hospital in several months, and it had been a tough year.
Q And was she--was Mrs. Currie coming by your place on her way to visit her mother in the hospital? Do you know that?
A That's what I remember her saying.
Q So you prepared--and you bought a gift for her mother?
A Correct.
Q Okay. Do you know what kind of time frame this covered? First of all, it was the same day, December the 28th, 1997?
A Seven, yes.
Q Do you know what kind of time frame it covered?
A I think it was afternoon. I know I've testified to around 2 o'clock.
Q Could it have been later?
A Sure.
Q So, when Betty Currie came, what--what did you have prepared for her?
A I had a box from the Gap with some of the presents
the President had given me, taped up in it.
Q. What happened when she arrived?
A. Uh, I think I walked out to the car and asked her
to hold onto this, and I think we talked about her mom for a
few minutes. Um--
Q. Did she call you right before she arrived, or did
you just go wait for her in the building?
A. I think she called me right before she--at some
point, I think, before she--either when she was leaving or
she was outside.
Q. Do you know--did you have any indication from Ms.
Currie what she was going to do with that box of gifts?
A. Um, I know I’ve testified to this. I don’t--I
don’t remember. I think maybe she said something about
putting it in a closet, but whatever I--I stand by whatever
I’ve said in my testimony about it.
Q. But she was supposed to keep these for you?
A. Well, I had asked her to.
Q. Okay. Did Ms. Currie ask you at any time about
what was in the box?
A. No, or not that I recall, I guess I should say.
Q. What was the--in your mind, what was the purpose
of having Ms. Currie retain these gifts as opposed to
another friend of yours?
A. Hmm, I know I’ve testified to this, and I
can't--can I look at my grand jury--I mean, I don't really remember sitting here right now, but if I could look at my grand jury testimony, I--or I'd just stand by it.

Q. We will pass that to you.
A. Okay. Thank you.

[Witness handed documents.]

BY MR. BRYANT:

Q. The answer I'm looking for is--if this refreshes your recollection is that turning these over was a reassurance to the President that everything was okay. Is that--
A. Can I read it in context, please?
Q. Sure, sure.
A. Thank you.

[Witness perusing document.]

THE WITNESS: I--I--I stand by this testimony. I mean, I'd just note that it--what I'm saying here about giving it to the President or the assurance to the President is how I saw it at that point, not necessarily how I felt then. So I think you asked me what--why I didn't at that point, and I'm just--that's what's a little more clear there, just to be precise. I'm sorry.

BY MR. BRYANT:

Q. Okay. Did you have any later conversations with either Ms. Currie or the President about these gifts in the
box?
A No.
Q Let me direct your attention to your meeting with
Vernon Jordan on December the 31st of 1997. Was that to go
back and talk about the job again?
A A little bit, but the--the--for me, the point of
that meeting was I had gotten to a point where Linda Tripp
wasn't returning my phone calls, and so I felt that I needed
to devise some way, that somehow--to kind of cushion the
shock of what would happen if Linda Tripp testified all the
facts about my relationship, since I had never disclosed
that to the President. So that was sort of my intention in
meeting with Mr. Jordan, was hoping that I could give a
little information and that would get passed on.
Q This was at a meeting for breakfast at the Park
Hyatt Hotel?
A Yes.
Q Were just the two of you present?
A Yes.
Q Did you discuss other things, other than Linda
Tripp and your job search?
A I think we talked about what each of us were doing
New Year's Eve.
Q Specifically about some notes that you had at your
apartment?
A Oh, yes. I'm sorry.

Um, well, I mean, that really was in relation to discussing Linda Tripp. So-

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

A Um, I-I don't know that I discussed the Jones lawyers. If I've testified that I discussed the Jones lawyers, then I did, but-

Q Okay. Well, tell us about the notes.

A Well, the--sort of the--I don't know what to call it, but the story that I gave to Mr. Jordan was that I was trying to sort of alert him that, gee, maybe Linda Tripp might be saying these things about me having a relationship with the President, and right now, I'm explaining this to you. These aren't the words that I used or how I said it to him, and that, you know, maybe she had seen drafts of notes, trying to obviously give an excuse as to how Linda Tripp could possibly know about my relationship with the President without me having been the one to have told her. So that's what I said to him.

Q And what was his response?

A I think it was something like go home and make sure--oh, something about a--I think he asked me if they were notes from the President to me, and I said no. I know I've testified to this. I stand by that testimony, and I'm just recalling it, that I said no, they were draft notes or
notes that I sent to the President, and then I believe he said something like, well, go home and make sure they're not there.

Q And what did you do when you went home?

A I went home and I searched through some of my papers, and--and the drafts of notes I found, I sort of--I got rid of some of the notes that day.

Q So you threw them away?

A Mm-hmm.

THE REPORTER: Is that a "yes"?

THE WITNESS: Yes. Sorry.

BY MR. BRYANT:

Q On your way home, you were with Mr. Jordan? I mean, he carried--did he carry you someplace or take you home, drop you off?

A Yes, he dropped me off.

Q Okay. On the way home--

A It wasn't on the way to my home, but--

Q Okay. Did he--did you tell him that you had had an affair with the President?

A Yes.

Q What was his response?

A No response.

Q When was the next time--well, let me direct your attention to Monday, January the 5th, 1998. You had an
occasion to meet with your lawyer, Mr. Carter, about your case, possible depositions, and so forth.

Did you have some concern at that point about those depositions and how you might answer questions in the Paula Jones case?

A Yes.

Q Did you reach any sort of determination or resolution of those concerns by talking to Mr. Carter?

A No.

Q What's the status of the affidavit at this point? Is there one?

A No.

Q Do you recall any other concerns or questions that either you or Mr. Carter may have presented to each other during that meeting?

A I think I--I think it was in that meeting I brought up the notion of having my family present, if I had to do a deposition, and he went through what--I believe we discussed--at this point, I think I probably knew at this point I was going to sign an affidavit, but it wasn't created yet, and I believe we discussed what--if the affidavit wasn't, I guess, successful--I don't know how you'd say legally--say that legally--but what a deposition would be like, sitting at a table.

Q I'll bet he never told you it would be like this.
Q: Did you try to contact the President after you left the meeting with Mr. Carter?
A: Yes.
Q: And you reached Betty Currie?
A: Yes.
Q: And you told her to pass along to the President that you wanted--it was important to talk with him?
A: Yes.
Q: You may have mentioned to her something about signing something?
A: Right; I might have.
Q: What response did you get from that telephone call?
A: Uh, Betty called me back, maybe an hour or two later, and put the President through.
Q: And what was that conversation?
A: I know I've testified to this, and it was sort of two-fold. On the one hand, I was, uh, upset, so I was sort of in a pissy mood and a little bit contentious. Uh, but more related to the case, uh, I had concerns that from questions Mr. Carter had asked me about how I got my job at the Pentagon and transferred and, and, uh, I was concerned as to how to answer those questions because those questions
involved naming other people who I thought didn't like me at
the White House, and I was worried that those people might
try and--just to get me in trouble because they didn't like
me--so that if they were then--I mean, I had no concept of
what exactly happens in these legal proceedings, and I
thought, well, maybe if I say Joe Schmo helped me get my
job, then they'd go interview Joe Schmo, and so, if Joe
Schmo said, "No, that's not true," because he didn't like
me, then I didn't want to get in trouble. So--

Q Did there appear to be a question possibly about
how you--how you got the job at the Pentagon? Did you fear
for some questions there?

A Yes. I think I tend to be sort of a
detail-oriented person, and so I think it was, uh, my
focusing on the details and thinking everything had to be a
very detailed answer and not being able to kind of step back
and look at how I could say it more generally. So that's
what concerned me.

Q Mm-hmm. This--

A Because clearly, I mean, I would have had to say,
"Gee, I was transferred from the Pentagon because I had this
relationship that I'm not telling you about with the
President." So there was--there was that concern for me
there.

Q And what did the President tell you that you could
A: That the people in Legislative Affairs helped me get the job—and that was true.

Q: Okay, but it was also true, to be complete, that they moved you out into the Pentagon because of the relationship with the President?

A: Right.

Q: Did—did the subject of the affidavit come up with the President?

A: Yes, towards the end of the conversation.

Q: And how did—tell us how that occurred.

A: I believe I asked him if he wanted to see a copy of it, and he said no.

Q: Well, I mean, how did you introduce that into the subject—into the conversation?

A: I don’t really remember.

Q: Did he ask you, well, how’s the affidavit coming or—

A: No, I don’t think so.

Q: But you told him that you had one being prepared, or something?

A: I think I said—I think I said, you know, I’m going to sign an affidavit, or something like that.

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

A: No.
Q And this is the time when he said something about
3 is other affidavits?
4 A Correct.
5 Q And tell us as best as you can recall what--how
6 that--how that part of the conversation went.
7 A I think that was the--sort of the other half of
8 his sentence as, No, you know, I don't want to see it. I
9 don't need to--or, I've seen 15 others.
10 It was a little flippant.
11 Q In his answer to this proceeding in the Senate, he
12 has indicated that he thought he had--might have had a way
13 that he could have you--get you to file a--basically a true
14 affidavit, but yet still skirt these issues enough that you
15 wouldn't be called as a witness.
16 Did he offer you any of these suggestions at this
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.
Q  The next day--well, on January the 6th--I'm not sure exactly what day we are--1998, did you pick up a draft of the affidavit from Mr. Carter?

A  Yes, I did.

Q  What did you do with that draft?

A  I read it and went through it.

Q  How did it look?

A  I don’t really remember my reaction to it. I know I had some changes. I know there’s a copy of this draft affidavit that’s part of the record, but--

Q  Were portions of it false?

A  Incomplete and misleading.

Q  Did you take that affidavit to Mr. Jordan?

A  I dropped off a copy in his office.

Q  Did you have any conversation with him at that point or some later point about that affidavit?

A  Yes, I did.

Q  And tell us about that.

A  I had gone through and had, I think, as it’s marked--can I maybe see? Isn’t there a copy of the draft? [Witness handed document.]

[Witness perusing document.]

THE WITNESS:  Thank you.

SENATOR DEWINE:  Mr. Bryant, can you reference for the record at this point?
MR. BRYANT: Okay.
SENATOR DeWINE: If you can.
MR. BRYANT: It would be--
MR. SCHIPPERS: 1229.
SENATOR DeWINE: 1229?
MR. SCHIPPERS: Yes.
SENATOR DeWINE: All right. Thank you.
BY MR. BRYANT:
Q Okay. Have you had an opportunity to review the
draft of your affidavit?
A I--yes.
Q Okay. What--do you have any comment or response?
A I received it. I made the suggested changes, and
I believe I spoke with Mr. Jordan about the changes I wanted
to make.
Q Did he have any comment on your proposed changes?
A I think he said the part about Lewis & Clark
College was irrelevant. I'd have to see the--I don't
believe it's in the final copy in the affidavit, so--but I
could be mistaken.
Q At this point, of course, you had a lawyer, Mr.
Carter, who was representing your interest. Mr. Jordan
was--I'm not sure if he--how you would characterize him, but
would it--would it be that you view Mr. Jordan as, in many
ways, Mr.--the President--if Mr. Jordan knew it, the
President knew it, or something of that nature?

A  I think I testified to something similar to that.

I felt that, I guess, that Mr. Jordan might have had the
President's best interest at heart and my best interest at
heart, so that that was sort of maybe a--some sort of a
blessing.

Q  I think, to some extent, what you--what you had
said was getting Mr. Jordan's approval was basically the
same thing as getting the President's approval. Would you
agree with that?

A  Yeah. I believe that--yes, I believe that's how I
tested to it.

Q  The fact that you assume that Mr. Jordan was in
contact with the President--and I believe the evidence would
support that through his own testimony that he had talked to
the President about the signed affidavit and that he had
kept the President updated on the subpoena issue and the job
search--

A  Sir, I'm not sure that I knew he was having
contact with the President about this. I--I think what I
said was that I felt that it was getting his approval. It
didn't necessarily mean that I felt he was going to get a
direct approval from the President.

I'm sorry to interrupt you.

Q  Oh, that's fine. At any time you need to clarify
a point, please--please feel free to do so.

Did--did--did you have any indication from Mr. Jordan that he--when he discussed the signed affidavit with the President, they were discussing some of the contents of the affidavit? Did you have--

A  Before I signed it or--

Q  No; during the drafting stage.

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

Q  Now, the changes that you had proposed, did Mr. Jordan agree to those changes?

A  I believe so.

Q  And then you somehow reported those changes back to Mr. Carter or to someone else?

A  No. I believe I spoke with Mr. Carter the next morning, before I went in to see him, and that's when I--I believe that's--I dictated the changes.

Q  Okay. Mr. Jordan did not relay the changes to Mr. Carter--you did?

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

Q  Specifically, the concerns that you had about--about the draft, what did they include, the changes?

A  I think one of the--I think what concerned me--and I believe I've testified to this--was--was in Number 6.
Even just mentioning that I might have been alone with the
President, I was concerned that that would give the Jones
people enough ammunition to want to talk to me, to think,
oh, well, maybe if she was alone with him that—that he
propositioned me or something like that, because I
hadn't—of course, I mean, you remember that at this point,
I had no idea the amount of knowledge they had about the
relationship. So—

Q  Did--Mr. Carter, I assume, made those changes, and
then you subsequently signed the affidavit?

A  We worked on it in his office, and then, yes, I
signed the affidavit.

Q  Is this the same day--

A  Yes.

Q  --at this point?

A  This was the 7th?

Q  Yes.

A  Correct.

Q  Did--did you take the signed--or a copy of the
signed affidavit, I should say--did you take a copy--did you
keep a copy?

A  Yes, I did.

Q  Did you give it to anyone or give anyone else a
copy?

A  No.
Q Now, did you, the next day on the 8th, go to New York for some interviews for jobs?
A It was--it--I either went later on the 7th or on the 8th, but around that time, yes.
Q Was this a place that you had already interviewed?
A Yes.
Q And I assume this was at McAndrews and Forbes?
A Yes.
Q How did you feel that the interview went?
A I--I know I characterized it in my grand jury testimony as having not gone very well.
Q Okay. I think you also mentioned it went very poorly, too. Does that sound--does that ring a bell?
A Sure.
Q Why? Why would you so characterize it?
A Well, as I've had a lot of people tell me, I'm a pessimist, but also I--I wasn't prepared. I was in a waiting room downstairs at McAndrews and Forbes, and--or at least, I thought it was a waiting room--and Mr. Durnan walked into the room unannounced, and the interview began.
So I felt that I started on the wrong foot, and I just didn't feel that I was as articulate as I could have been.
Q Did you call Mr. Jordan after that?
A Yes, I did.
Q Did you express those same concerns?
A Yes, I did.
Q What did he say?
A And this is a little fuzzy for me. I know that I had a few phone calls with him in that day. I think in this call, he said, you know, "Don't worry about it." I--my testimony is probably more complete on this. I'm sorry.
Q What--what other phone calls did you have with him that day?
A I remember talking to--I know that at some point, he said something about that he'd call the chairman, and then I think he said just at some point not to worry. He was always telling me not to worry because I always--I overreact a little bit.
Q All total, how many calls did you have with him that day--your best guess?
A I have no idea.
Q More than two?
A I--I don't know.
Q Can you think of any other subjects the two of you would have talked about?
A I don't think so.
Q Did he, Mr. Jordan, tell you that he had talked to the chairman, or Mr. Perelman, whatever his title is?
A I'm sorry. I know I've testified to this. I don't--I think so.
Q And you had--did you have additional interviews at
this company or a subsidiary?
A Yes, I--well, I had with the sort of, I guess,
daughter--daughter company, Revlon. I had an interview with
Revlon the next day.
Q And you were offered a job?
A Yes, I was.
Q About the 9th or so? That would have been 2 days
after the affidavit?
A Oh. Actually, no. I think I was offered a
position, whatever that Friday was. Oh, yes, the 9th. I'm
sorry. You're right.
Oh, wait. It was either the 9th or the 13th--or
the 12th--the 9th or the 12th.
Q Okay. Now, I'm--I was looking away. I'm
confused.
A That's okay. I--my interview was on the 9th, and
I don't remember right now--I know I've testified to
this--whether I found out that afternoon or it was on Monday
that I got the informal offer.
Q Mm-hmm.
A So, if you want to tell me what I said in my grand
jury testimony, I'll be happy to affirm that.
Q I think we may be talking about perhaps an
informal offer. Does that--on the 9th?
A Yes. I know it was--okay. Was it on the--I don't--

Q Yes.

A --remember if it was the 9th or the 13th--

Q Okay.

A --but I know Ms. Sideman called me to extend an informal offer, and I accepted.

Q Okay. Now, in regard to the affidavit--do you still have your draft in front of you?

A Yes, sir.

Q In paragraph number 3, you say: "I can not fathom any reason--fathom any reason why--that the plaintiff would seek information from me for her case."

A Yes, sir.

Q Did Mr. Carter at all go into the gist of the Paula Jones lawsuit, the sexual harassment part of it, and tell you what it was about?

A I think I knew what it was about.

Q All right. And then you indicated that you didn't like the part about the doors, being behind closed doors, but on the sexual relationship, paragraph 8, the first sentence, "I've never had a sexual relationship with the President"--

A Mm-hmm.

Q --that's not true, is it?
A No. I haven't had intercourse with the President, but--

Q Was that the distinction you made when you signed that affidavit, in your own mind?

A That was the justification I made to myself, yes.

Q Let me send you the final affidavit. It might be a little easier to work from--

A Okay.

Q --than the-- than the original.

MR. BRYANT: Do we have all the-- 1232.

[Witness handed document.]

SENATOR DeWINE: Congressman?

MR. BRYANT: Yes.

SENATOR DeWINE: We're down to 3 minutes on the tape. Would now be a good time to have him switch tapes and then we'll go right back in?

MR. BRYANT: Okay, that would be fine.

SENATOR DeWINE: I think we'll hold right at the table, and we'll get the tapes switched.

THE VIDEOGRAPHER: Okay, we will do that now.

This marks the end of Videotape Number 2 in the deposition of Monica S. Lewinsky.

We are going off the record at 14:31 hours.

[Recess.]

THE VIDEOGRAPHER: This marks the beginning of
Videotape Number 3 in the deposition of Monica S. Lewinsky.

The time is 14:44 hours.

SENATOR Dewine: We are back on the record.

Let me advise counsel that you have used 3 hours

and 2 minutes.

Congressman Bryant, you may continue.

MR. BRYANT: Thank you, sir.

BY MR. BRYANT:

Q Ms. Lewinsky, let me just follow up on some points

here, and then I’ll move toward the conclusion of my direct

examination very, very quickly, I hope.

In regard to the affidavit--I think you still have

it in front of you--the final copy of the affidavit--I

wanted to revisit your answer about paragraph 8--

A Yes, sir.

Q --and also refer you to your grand jury testimony

of August the 6th. This begins on--actually, it is on page

1013 of the--it should be the Senate record, in the

appendices, but it’s your August 6th, 1998, grand jury

testimony.

And it’s similar to the--my question about

paragraph 8 about the sexual relationship--and I notice

you--you now carve out an exception to that by saying you

didn’t have intercourse, but I would direct your attention

to a previous answer and ask if you can recall being asked
this question in your grand jury testimony and ask--giving
the answer--the question is: "All right. Let me ask you a
straightforward question. Paragraph 8, at the start, says,
quote, 'I have never had a sexual relationship with the
President,' unquote. Is that true?," and your answer is,
"No."

Now, do you have any comment about why your answer
still would not be no, that that is not a true statement in
paragraph 8?

A  I think I was asked a different question.
Q  Okay.

A  My recollection, sir, was that you asked me if
that was a lie, if paragraph 8 was--I--I'm not trying to--
Q  Okay. Well, if--if I ask you today the same
question that was asked in your grand jury, is your
statement, quote, "I have never had a sexual relationship
with the President," unquote, is that a true statement?
A  No.
Q  Okay, that's good.

Now, also in paragraph 8, you mention that there
were occasions after you left--I think it looks like
the--the last sentence in paragraph 8, "The occasions that I
saw the President after I left my employment at the White
House in April 1995 were official receptions, formal
functions, or events related to the United States Department
of Defense, where I was working at the time," period--
actually the last sentence, "There were other people present
on those occasions." Now, that also is not a truthful
statement; is that correct?
A It--I think I testified that this was misleading.
It's incomplete--
Q Okay. It's not a truthful statement?
A --and therefore, misleading.
Well, it--it is true; it's not complete.
Q Okay. All right. Now, I will accept that.
A Okay. Thank you.
Q Thank you.

Going back to the gift retrieval of December the
28th, I want to be clear that we're on the same sheet of
music on this one. As I understand, there's no doubt in
your mind that Betty Currie called you, initiated the call
to you to pick up the gifts? She--
A That's how I remember this event.
Q And you went through that process, and at the very
day, you were sitting out in the car with her, with a box of
gifts, and it was only at that time that you asked her to
keep these gifts for you?
A I don't think I said "gifts." I don't--
Q Or keep this package?
A I think I said--gosh, was it in the car that I
said that or on the phone? I think it was in the car.
1--I'm--I don't know if that makes a difference.

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..
Q  Uh-huh.
A  Or, that's how I remember what happened.
Q  Okay. And your response to the question in the
deposition that I just asked you--were you ever under the
impression from anything the President said that you should
have--that you should turn over all the gifts to the Jones
lawyers--your answer in that deposition was no.
A  And which date was that, please?
Q  The deposition was August the 26th.
A  Oh, the 26th.
Q  Yes.
A  It might have been after that, or maybe it was--I
don't--
Q  Okay. I wanted to ask you, too, about a couple of
other things in terms of your testimony. Regarding the
affidavit--and this appears to be, again, grand jury
testimony--
A  Sir, do you have a copy that I could look at if
you're going to--
Q  Sure. August, the August 6th--233--it's the--it's
this page here.
While we're looking at that, let me ask you a
couple other things here. I wanted to ask you--I talked to
you a little bit about the President today and your feelings
today that persist that you think he's a good President, and
I assume you think he's a very intelligent man?

A  I think he's an intelligent President.

[Laughter.]

MR. BRYANT: Okay. Thank goodness, this is confidential; otherwise, that might be the quote of the day.

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

BY MR. BRYANT:

Q  Referring to January the 18th, 1998, the President had a conversation with Betty Currie, and he made five statements to her. One was that "I was never really alone with Monica; right?" That's one. That's not true, is it, that "I was never alone with"--

A  Sir, I was not present for that conversation. I don't feel comfortable--

Q  Let me ask you, though--I realize none of us were there--but that statement, "I was never really alone with Monica; right?"--that was not--he was alone with you on many occasions, was he not?

A  I--I'm not trying to be difficult, but I feel very uncomfortable making judgments on what someone else's statement when they're defining things however they want to define it. So if you--if you ask me, Monica, were you alone with the President; I will say yes, but I'm not comfortable characterizing what someone else says--

Q  Okay.
---passing judgment on it. I'm sorry.

Q Were you--was Betty Currie always with you when the President was with you?

A Betty Currie was always at the White House when I went to see the President at the White House after I left working at the White House.

Q But was--at all times when you were alone with the President, was Betty Currie always there with you?

A Not there in the room.

Q Okay. Did--did--did you come on to the President, and did he never touch you physically?

A I guess those are two separate questions, right?

Q Yes, they are.

A Did I come on to him? Maybe on some occasions.

Q Okay.

A Not initially.

Q Okay. Not initially.

A I--

Q Did he ever--did he ever touch you?

A Yes.

Q Okay. Could Betty Currie see and hear everything that went on between the two of you all the time?

A I can't answer that. I'm sorry.

Q As far as you know, could she see and hear everything that went on between the two of you?
A Well, if I was in the room, I couldn't--I couldn't be in the room and being able to see if Betty Currie could see and hear what was--

Q I think I--

MR. STEIN: Wouldn't it be a little speedier--if I may make this observation, you have her testimony; you have the evidence of--

SENATOR DeWINE: Counsel, is this an objection?

MR. STEIN: I just would ask him to draw whatever inferences there were to speed this up.

SENATOR DeWINE: I'll ask him to rephrase the question.

MR. BRYANT: I would just stop at that point. I think, uh, that's enough of that.

BY MR. BRYANT:

Q The President also had conversations with Mr. Blumenthal on January the 21st, 1998, and indicated that you came on to the President and made a sexual demand. At the initial part of this, did you come on to the President and make a sexual demand on the President?

A No.

Q At the initial meeting on November the 15th, 1995, did he ever rebuff you from these advances, or from any kind of--

A On November 15th?
Q: November 15th. Did he rebuff you?
A: No.
Q: Did you threaten him on November 15th, 1995?
A: No.
Q: On January 23rd, 1998, the President told John Podesta that—many things. I’ll—I’ll withdraw that. Let me go—kind of wind this down. I’d like to save some time for redirect.
You’ve indicated that with regard to the affidavit and telling the truth, there is some testimony I’d like to read you from your deposition that we started out—August the 6th—I’m sorry—the grand jury, August 6th, 1998—
MS. MILLS: What internal page number?
MR. SCHIPPERS: 1021 internal, 233.
MR. BRYANT: Okay, we need to get her a copy.
MR. SCHIPPERS: Do you have the August 6th still over there?
THE WITNESS: I can share with Sydney—if you don’t mind.
[witness perusing document.]
BY MR. BRYANT:
Q: Beginning—do you have page 233—
A: Uh-huh.
Q: --okay—beginning at line 6—
A: Okay.
Q --it reads-- would you prefer to read that? Why
don’t you read--
A Out loud?
Q Would you read it out loud?
A Okay.
Q Through line 16--6 through 16. This is your answer.
A “Sure. Gosh. I think to me that if-- if the
President had not said the Betty and letters cover, let’s
just say, if we refer to that, which I’m talking about in
paragraph 4, page 4, I would have known to use that. So to
me, encouraging or asking me to lie would have-- you know, if
the President had said, Now, listen, you’d better not say
anything about this relationship, you’d better not tell them
the truth, you’d better not-- for me, the best way to explain
how I feel what happened was, you know, no one asked or
encouraged me to lie, but no one discouraged me, either.”
Q Okay. That-- that statement, is that consistent in
your view with what you’ve testified to today?
A Yes.
Q Okay. Look at page 234, which is right below
there.
A Okay. [Perusing document.]
Q Beginning with the-- your answer on line 4, and
read down, if you could, to line 14--4 through 14.
"Yes and no. I mean, I think I also said that Monday that it wasn’t as if the President called me and said, You know, Monica, you’re on the witness list. This is going to be really hard for us. We’re going to have to tell the truth and be humiliated in front of the entire world about what we’ve done, which I would have fought him on, probably. That was different. And by him not calling me and saying that, you know, I knew what that meant. So I, I don’t see any disconnect between paragraph 10 and paragraph 4 on the page. Does that answer your question?"

Q Okay. Now, has that--has your testimony today been consistent with that provision?

A I--I think so.

Q Okay.

A I’ve intended for my testimony to be consistent with my grand jury testimony.

Q Okay. And one final read just below that, line 16 through 24.

A "Did you understand all along that he would deny the relationship also?"

"Mm-hmm, yes."

Q And 19 through 24--the rest of that.

A Oh, sorry.

"And when you say you understood what it meant when he didn’t say, Oh, you know you must tell the truth,
what did you understand that to mean?"

"That, that, as we had on every other occasion and
in every other instance of this relationship, we would deny
it."

MR. BRYANT: Okay.

Could we have just--go off the record here a
minute?

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

THE VIDEOGRAPHER: We're going off the record at
1459 hours.

[Recess.]

THE VIDEOGRAPHER: We're going back on the record
at 1504 hours.

SENATOR DeWINE: Manager Bryant, you may proceed.

MR. BRYANT: Thank you, Senator.

BY MR. BRYANT:

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

With regard to the false affidavit, you do admit
that you filed an untruthful affidavit with the court in the
Jones case; is that correct?

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

Q Okay. With regard to the cover stories, on
December the 6th, you and the President went over cover stories, and in the same conversation he encouraged you to file an affidavit in the Jones case; is that correct?

A No.

MS. SELIGMAN: I think that misstates the record.

BY MR. BRYANT:

Q All right. On December the 17th. Let's try December 17; all right?

A Okay.

Q You and the President went over cover stories---that's the telephone conversation---

A Okay--I'm sorry--can you repeat the question?

Q Okay. On December 17th, you and the President went over cover stories in a telephone conversation.

A Correct.

Q And in that same telephone conversation, he encouraged you to file an affidavit in the Jones case?

A He suggested I could file an affidavit.

Q Okay. With regard to the job, between your meeting with Mr. Jordan in early November and December the 5th when you met with Mr. Jordan again, you did not feel that Mr. Jordan was doing much to help you get a job; is that correct?

MS. SELIGMAN: Objection. Misstates the record.

BY MR. BRYANT:
Q  Okay. You can answer that.
A  It--
Q  Let me repeat it. Between your meeting with Mr. Jordan in early November and December the 5th when you met with Mr. Jordan again, you did not feel that Mr. Jordan was doing much to help you get a job; is that correct?

MS. SELIGMAN: Same objection.
THE WITNESS: Do you mean when I met with him again on December 11th? I don't--
MR. BRYANT: The--
THE WITNESS: --I didn't meet with Mr. Jordan on December 5th. I'm sorry--
MR. BRYANT: Okay.
THE WITNESS: --am I misunderstanding something?
MR. BRYANT: We're getting our numbers wrong here.
THE WITNESS: Okay.
BY MR. BRYANT:
Q  Between your meeting with Mr. Jordan in early November and December the 11th when you met with Mr. Jordan again, you did not feel that Mr. Jordan was doing much to help you get a job; is that correct?
A  I hadn't seen any progress.
Q  Okay. After you met with Mr. Jordan in early December, you began to interview in New York and were much more active in your job search; correct?
A Yes.
Q In early January, you received a job offer from Revlon with the help of Vernon Jordan; is that correct?
A Yes.
Q Okay. With regard to gifts, regarding the gifts that were subpoenaed in the Jones case, you are certain that Ms. Currie called you and that she understood you had something to give her; is that correct?
A That's my recollection.
Q You never told Ms. Currie to come pick up the gifts or that Michael Isikoff had called about them; is that correct?
A I don't recall that.
Q Regarding stalking, you never stalked the President; is that correct?
A I--I don't believe so.
Q Okay. You and the President had an emotional relationship as well as a physical one; is that right?
A That's how I'd characterize it.
Q Okay. He never rebuffed you?
A I--I think that gets into some of the intimate details of--no, then, that's not true. There were occasions when he did.
Q Un-huh. Okay. But he never rebuffed you initially on that first day, November the 15th, 1995?
A  No, sir.

MR. BRYANT: With that question, I would like to close my direct examination and reserve the balance of time.

SENATOR EDWARDS: May I ask a question?

SENATOR DeWINE: We are now at 3 minutes and 20 seconds--I'm sorry--3 hours and 20--you would have 40 minutes reserved.

SENATOR EDWARDS: Does that complete the direct examination?

MR. BRYANT: That completes your direct.

SENATOR EDWARDS: That was my question.

THE WITNESS: Do you want these back?

[Witness handing documents.]

SENATOR DeWINE: We will now turn to White House Counsel.

MS. SHELIGNAN: We have no questions of the witness.

Ms. Lewinsky, on behalf of the President, we'd like to tell you how very sorry we all are for what you have had to go through.

THE WITNESS: Thank you.

SENATOR DeWINE: All right. Ms. Lewinsky, thank you very much.

This concludes the deposition.

MR. CACHERIS: May the witness be excused?
SENATOR DeWINE: The witness is excused.

[Witness excused.]

THE VIDEOGRAPHER: This does conclude the
deposition of Monica S. Lewinsky.

We are going off the record at 1509 hours--

SENATOR DeWINE: Let me, before we go off the
record--Ms. Lewinsky is done with the testimony, but let me
just read for the record and for everyone who is in the
room--and we do have a number of people in the room--Section
205 that I noted earlier, which reads: "All present must
maintain the confidentiality of the proceedings," end of
quote.

For Senators and Senate employees, they should be
aware that this deposition is a, quote, "confidential
proceeding of the Senate under Senate Rule 29.5." This
deposition may be discussed only with Members of the Senate
and staff designated by Members of the Senate.

House Managers and House employees may only
discuss this deposition with fellow Managers and staff
designated by the Managers.

The President's counsel may only discuss this
deposition with the President and counsel and staff
representing the President in this matter.

Ms. Lewinsky and her counsel may only discuss this
deposition with each other.
This injunction remains in effect unless ordered
otherwise by the United States Senate. Moreover, any record
of this deposition made available must similarly be kept
confidential until further order of the United States
Senate.

All persons are admonished to conduct themselves
accordingly.

Ms. Lewinsky, again, thank you very much.

MR. BRYANT: Mr. Chairman?

SENATOR DeWINE: Mr. Bryant?

MR. BRYANT: It may be a technical point, and I
want to be clear. Mr. Cacheris has asked that his witness
be excused, and I'm thinking there is that slight
possibility that she could be called, and we ought to make
sure that she stays on call.

SENATOR DeWINE: The witness is excused from this
particular deposition.

MR. ROGAN: Senator, may we have you state for the
record that the witness is to remain on call to the United
States Senate in the event that becomes necessary in later
proceedings?

SENATOR DeWINE: We'll go off the record for the
moment.

THE VIDEOGRAPHER: We're going off the record at
1511 hours.
[Discussion off the record.]

THE VIDEOGRAPHER: We're going back on the record at 1512 hours.

SENATOR DeWINE: I want to make it clear to everyone that it would take a separate subpoena for Ms. Lewinsky to appear again. And when I stated that this concludes this deposition, that's what I meant--this concludes this particular deposition.

Again, Ms. Lewinsky, thank you very much.

THE VIDEOGRAPHER: This does now conclude this deposition. We're going off the record at 1512 hours.

The total number of tapes used is three.

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

[Signature]

CATHY JARDIM
## MANAGER'S EXHIBITS

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<td>Definition of &quot;Sexual Relations&quot; used in 1/17/98 Deposition</td>
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<tr>
<td>1</td>
<td>identifying her. How would you characterize her, please?</td>
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<td>THE WITNESS: Initially, I would consider her as an</td>
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<td>intern who had been maligned improperly. Later on, I</td>
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<td>considered her as a pain in the neck, more or less.</td>
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<td>5</td>
<td>MR. BITTMAN: Or lower, I think you said.</td>
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<td>6</td>
<td>THE WITNESS: Well, yes, sir.</td>
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<td>7</td>
<td>A JUROR: This is the third question. Do you know</td>
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<td>8</td>
<td>to call</td>
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<td>of anyone who ever received, in your lifetime, the number of</td>
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<td>10</td>
<td>favorable supports in seeking employment through people like</td>
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<td>11</td>
<td>Vernon Jordan, the President, several other people in the</td>
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<td>12</td>
<td>White House and yourself included, as one of those important</td>
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<td>13</td>
<td>people?</td>
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<td>14</td>
<td>THE WITNESS: In my lifetime?</td>
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<td>15</td>
<td>A JUROR: Yes, ma'am.</td>
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<td>16</td>
<td>THE WITNESS: That's a long time. Let me think.</td>
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<td>17</td>
<td>I have heard people tell me that when they say</td>
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<td>that you've approached Vernon for a job. I say, &quot;Yes.&quot; They</td>
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<td>19</td>
<td>say, &quot;Do you know,&quot; the list goes on and on, the people who</td>
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<td>20</td>
<td>have approached Vernon for a job.</td>
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<td>21</td>
<td>obviously,</td>
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<td>22</td>
<td>very seen</td>
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<td>23</td>
<td>The fact that Monica did was just minor.</td>
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<td>24</td>
<td>I haven't had the President's backing on it, so I couldn't go</td>
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<td>25</td>
<td>as far as I would like to.</td>
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<tr>
<td>1</td>
<td>Q I think his question is more the number and the</td>
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<td>high level of the people. That is to say, the President</td>
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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).
him that -- I asked him if we could sort of bump into the
hallway, bump into each other in the hallway on purpose this
time, because when it happened accidentally, that seemed to
work really well and I felt more comfortable doing that. So,
that's what we did. We both said, okay, I'm going to leave
now.

And indeed we bumped into each other in the hall
and went through the Rose Garden into the Oval Office. And I
think we went right into the back office. The -- when we got
there.

Q When you say the back office, you mean the study?
A Yes. And -- let's see.

You know, I need to take a break.

Q Okay. Let's take a break.

(Whereupon, the deposition was recessed from 1:10 p.m.
until 1:15 p.m.)

BY MS. INGERGUT:

Q Ms. Lewinsky, you are still under oath.
A Yes.

Q We are still on February 4th, 1996. You've
described going into the office and starting to kiss the
President. What happened then?
A We were in the back office and we were kissing, al
I was -- I had a dress on that buttoned all the way, all the
way up and down.
Q To the neck?
A Correct. It was long and down to the, to my ankles, or whatever. And he unbuttoned my dress and he unhooked my bra, and sort of took the dress off of my shoulders and took the bra off of my, off of my -- I'm not explaining this right. So that he moved the bra so that my bra was kind of hanging on one shoulder and so was off. And he just was, he was looking at me and touching me and telling me how beautiful I was.
Q And did he touch your breasts with his hands?
A Yes.
Q Did he also touch them with his mouth?
A Yes.
Q And at that point, that is directly on your skin, is that right?
A Yes.
Q Did he touch your genitals?
A Yes, he did.
Q Did he bring you to orgasm on that date?
A Yes, he did.
Q
A
Q
Q And again, just with respect to bringing you to an orgasm, did he touch you directly on your skin on your genitals, or was it through underwear?
A First it was through underwear and then it was directly touching my genitals.
Q Did he take your underwear off, or did you take your underwear off?
A Hmm.
Q Or did they stay on?
A I think that -- I believe that he touched me first with my underwear on, and then placed his hand under my underwear. And I think at some point I, I removed them.
Q Okay. Did you also perform oral sex on him at th
A: Unfortunately, yes.

Q: And I think we've already gone into detail about the dress on that. The next encounter is March 29th, 1997. Would you tell us how that encounter was set up?

A: It was, it was set up through my conversations with Betty.

Q: Did you contact Betty?

A: Yes. I contacted Betty and Betty -- my understanding was Betty spoke with the President, and then Betty got in touch with me and told me to come that afternoon. I did. I was waiting for the President in the back study and then he hobbled in because he was on crutches. And we were, we were in the back office. Actually, it was sort of an overcast day. It had been raining earlier. So, it was just sort of dark and overcast.

And we were, he was -- I think he had put his crutches down and he was kind of leaning on me. So, I was holding him, you know, I mean, sort of romantically but at the same time literally holding him. And --

Q: This is in the back study?

A: Uh-huh, yes. And I was -- this was another one of those occasions when I was babbling on about something, and he just kissed me, kind of to shut me up, I think. And so we were kissing and then we sort of -- we turned around and he was leaning against -- he has a little, it's like a little
table that I think has this stereo. I don't know if the
stereo was always there. I know it was there later. But he
was leaning against this little table a little bit just, I
think, kind of for support.

And he unbuttoned my blouse and just sort of
touched me over, over my bra. And I don't think he took, I
don't think he exposed my breasts that day. And we were, we
were just kissing a lot.

And then he -- oh, he went to go put his hand down
my pants, and then I unzipped them because it was easier.
And I didn't have any panties on. And so he manually
stimulated me.

Q Did he bring you to orgasm?
A Yes, four times.

Q

A

Q

A

Q

A

Q

A

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.
I remember -- I know that he -- I believe I unbuttoned my jacket and he touched my, my breasts with my bra on, and then either -- I don't remember if I unhooked my bra or he lifted my bra up, but he -- this is embarrassing.

Q Then touched your breasts with his hands?
A Yes, he did.

Q Did he touch your breasts with his mouth?
A Yes, he did.

Q Did he touch your genital area at all that day?
A Yes. We moved -- I believe he took a phone call in his office, and so we moved from the hallway into the back office, and the lights were off. And at that point, he, he put his hand down my pants and stimulated me manually in the genital area.

Q And did he bring you to orgasm?
A Yes, he did.

Q Back to the touching of your breasts for a minute, was that then through clothing or actually directly onto your skin?
A He touched my breasts through clothing, being my bra, and then also without my bra on.

Q On that occasion, did you perform oral sex on the President?
A Yes.

Q Who actually initiated your performing oral sex?
MR. EMNICK: Just to clarify, the witness is looking at Grand Jury Exhibit ML-6.

THE WITNESS: I'm not really sure, because I don't think it was to necessarily gratify him or arouse him.

A JUROR: What was it for?

THE WITNESS: It was just -- I thought it was funny and it was sort of a -- I don't know how to explain it.

A JUROR: Contact.

BY MR. EMNICK:

Q Would it be better described as perhaps affectionate or playful?

A Playful, I think. It was just -- playful, not something I'd ever thought I'd have to discuss publicly.

A JUROR: While we're on this. I wanted to like finish it up, but I had a couple of questions with regards to the definition.

THE WITNESS: Sure.

A JUROR: Because I want to be sure in my own mind. At the bottom it says -- it says "Contact means intentional touching, either directly or through clothing."

THE WITNESS: Mm-hmm.

A JUROR: Out of all of the times you had intimate contact, were there times when the President would touch you either on the breasts or in the genital area directly to the skin or was it always through clothing?

8/20/91
THE WITNESS: Directly to the skin. Both.

MR. EMMICK: Yes, ma'am?

A JUROR: I have some questions about the 50th birthday. That's when you gave the President the yellow tie. Is that when you gave the President the yellow tie?

THE WITNESS: Not on that date.

A JUROR: But just before that.

THE WITNESS: But before that. Correct.

A JUROR: When it shows on the chart here, it says "Some time before August 16, 1996."

THE WITNESS: Correct.

A JUROR: And that tie is the same tie that at the end of your appearance here we saw some evidence that the President has worn a number of times this summer.

THE WITNESS: Yes.

A JUROR: There's been some press accounts about that tie, last night and today.

THE WITNESS: Sure.

A JUROR: My question to you is have you authorized your attorneys or any other spokesperson through you to discuss that evidence?

THE WITNESS: Gosh. I don't think I've necessarily given a direct authorization.

A JUROR: Do you know that they have?

THE WITNESS: Do I know if they -- I -- I don't
February 2, 1999

BY FAX (202) 546-1502
Cathy Jardim
Christopher Bisko
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. Bisko:

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

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

cc: Monica S. Lewinsky (by hand)
    Thomas B. Griffith, Esquire (by hand)
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 K. ROGAN
APPEARANCES: (continued)

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

WILLIAM G. HUDNLEY, ESQ.
ANTHONY T. PIERCE, ESQ.
GLENDIA 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. COON
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, DPR
THOMAS C. BITSKO, CVR-CM
Miller Reporting Company, Inc.
507 C Street, N.W.
Washington, D.C. 20002

VIDEOGRAPHERS:

THOMAS W. O'LENDER, CLVS
GREGORY K. SMITH
Video Age, Inc.
1522 K Street, N.W., Suite 215
Washington, D.C. 20005
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THE VIDEOGRAPHER: We are going on the record at 9:10 a.m.

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

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

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

By unanimous consent of the Senate, the Majority Leader and the Democratic Leader were authorized, acting jointly, to determine the time and place for the taking of the depositions authorized by Senate Resolution 30. The
leaders, through Senate Legal Counsel, have conferred with
counsel for Mr. Jordan, the House Managers, and the
President's counsel, and have determined, acting jointly,
that Mr. Jordan's deposition should take place on this date,
Tuesday, February 2nd, 1999, in room S-407 of the Capitol
beginning at 9 o'clock a.m.

By unanimous consent of the Senate, the time
allotted for examination of Mr. Jordan by the parties shall
not exceed 8 hours. Each side may examine Mr. Jordan for up
to 4 hours. Time consumed by objections shall not be
charged to the questioning period. Senate Legal Counsel
shall advise the Presiding Officers of the time spent in
questioning by the parties. The Presiding Officers
anticipate that a 5-minute break will be taken every hour,
and that the deposition will recess for one hour at lunch at
approximately 12:30. Should the witness desire a recess at
any point, he should direct a request to the Presiding
Officers, who will make every effort to accommodate his
request. At any point, if the reporter or videographer
needs a pause in the proceedings for technical reasons,
please make that known so that we can accommodate you.

According to the terms of the Senate Resolution
30, the scope of the examination of Mr. Jordan by the
parties shall be limited to the subject matter reflected in
the Senate record. The questioning will begin first by
House Managers, to be followed by the President’s counsel. Subsequent questioning by the parties will be permitted within the time allotted, but the scope of such questioning shall be limited to the subject matter of the prior questioning.

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

Section 205 of Senate Resolution 30 requires that these depositions be conducted in private. Attendance at this deposition is limited to the witness, his counsel, the House Managers and counsel, counsel for the President, the Presiding Officer Senators, Senate Legal Counsel and Deputy Legal Counsel, Senate personnel whose presence is required as determined by the Majority Leader and the Democratic
Leader, and those persons whose attendance is required to
make and preserve a record of these proceedings.

I note that according to the terms of Section 205:
"All present must maintain the confidentiality of the
proceedings." For Senators and Senate employees, they
should be aware that this deposition is a
"confidential...proceeding[] of the Senate," under Senate
Rule 29.5. This deposition may be discussed only with
members of the Senate and staff designated by members.
House Managers and House employees may only discuss this
deposition with fellow Managers and staff designated by the
Managers. The President's counsel may only discuss this
deposition with the President and counsel and staff
representing the President in this matter. The witness and
his counsel may only discuss this deposition with each
other. This injunction remains in effect unless ordered
otherwise by the United States Senate. Moreover, any record
of this deposition made available must similarly be kept
confidential until further order of the United States
Senate. All persons are admonished to conduct themselves
accordingly.

A videotape record and transcription of this
deposition are being made and will be made available for
review by Members of the Senate, one designated staff member
per Senator, the Chief Justice of the United States, the
House Managers, the President's counsel, and the witness' counsel for their review in connection with the impeachment proceedings.

As I mentioned, I am joined today as Presiding Officer of this deposition by Senator Chris Dodd.

Senator Dodd, do you have anything that you would like to add?

SENATOR DODD: Well, thank you, Senator Thompson.

For the record, I am Senator Christopher Dodd, and along with Senator Fred Thompson, been appointed by the Majority Leader and the Democratic Leader of the United States Senate, acting jointly, to preside over this deposition which is being taken in the trial of the impeachment of William Jefferson Clinton, President of the United States.

I concur with everything that Senator Thompson has said in his opening remarks, and would just add two points, if I may.

With regard to the objections--this is, by the way--yesterday, Senator DeWine and Senator Leahy worked out several questions regarding some process issues, one of those dealing with objections. Counsel for the witness and the parties may make objections, which shall be directed to the Presiding Officer Senators who have the authority to rule as an initial matter upon any question arising out of
the deposition. The Presiding Officers will confer, as necessary, to address objections, and will seek, where possible, to reach agreement. For this purpose, we may need to go briefly off the record to discuss any pending objections.

Lastly, I just want to mention on the section that Senator Thompson read about the confidentiality of these proceedings, I think about a half an hour passed yesterday before the details of all of these matters were available to the press, and I just want to reinforce that notion that this has to be taken very, very seriously. And we hope that all involved here will take note of what Senator Thompson has said about the confidentiality of these proceedings.

And with that, Senator, I'm--

SENATOR THOMPSON: Thank you very much, Senator Dodd.

At this time, I would invite each of those present around the table to introduce themselves.

May we start with you?

MS. WALDEN: Yes. I'm Glenda Walden.


SENATOR THOMPSON: Counsel for?

MR. HUNDELEY: Counsel for Mr. Jordan.

SENATOR THOMPSON: All right.

MR. JORDAN: I'm Vernon E. Jordan, Jr.
MS. OVERTON: Amy Overton.

MR. PIERCE: Anthony Pierce.

MR. FRANKEL: Morgan Frankel, Deputy Senate Legal Counsel.

MR. GRIFFITH: Tom Griffith, Senate Legal Counsel.

SENATOR THOMPSON: All right.

MS. BOGART: Susan Bogart, with the House Managers.

SENATOR DODD: You've got to speak up a little bit. Do we have it?

MS. BOGART: Susan Bogart, with the House Managers.

MR. HUTCHINSON: Asa Hutchinson, representing the House Manager.

MR. KENDALL: I'm David Kendall, personal counsel to President Clinton.

MS. MILLS: Cheryl Mills, Deputy Counsel to the President.

SENATOR THOMPSON: Okay. Assisting Senator Dodd and myself are Senate Legal Counsel, Tom Griffith, and Deputy Legal Counsel, Morgan Frankel.

I would also note the presence in the room of Senators DeWine and Leahy, who have also been appointed Presiding Officers by the Majority Leader and the Democratic Leader.
The videographers today are Thomas Glender and Gregory Smith, employed by Video Age of Washington, D.C. The court reporters today are Cathy Jardim and Christopher Bitsko of Miller Reporting Service.

If there are no questions from the parties or counsel for the witness, I will now swear the witness. Mr. Jordan, please raise your right hand.

MR. KENDALL: Senator Thompson?

SENATOR THOMPSON: Yes.

MR. KENDALL: Excuse me. I do have an objection. We received the exhibits for today's deposition in a binder here, approximately 15 minutes ago. I object because Senate Resolution 30 quite clearly provides in Section 204 that parties taking a deposition will provide to the other side, 18 hours in advance of the deposition, copies of the deposition exhibits.

Now, yesterday, at the deposition of Ms. Lewinsky, Deputy White House Counsel, Cheryl Mills, filed a similar objection because, likewise, we had not been provided the exhibits to the Lewinsky deposition in an appropriate and timely manner.

The Presiding Officers, Senator DeWine and Senator Leahy, ruled yesterday that the language of Section 204 means what it says, 18 hours in advance, we're to be provided copies of deposition exhibits.
Now, yesterday afternoon, mid-afternoon, I did receive a schedule of deposition exhibits, which appears to be somewhat different than the schedule I see in this binder, and I received about, perhaps, half-an-inch of documents. We elected to proceed yesterday, not abandoning our objection. We’ll do our best to proceed in good faith today, but I want to put the House Managers on notice that tomorrow, we will move to strike any exhibit that we do not receive in a timely fashion, and that would be by 3 o’clock this afternoon. We will attempt to go forward today, reserving our objection.

SENATOR THOMPSON: All right. Representative Hutchinson, do you have any comments to make on that issue?

MR. HUTCHINSON: Senator Thompson, yes. The House Managers did submit to the White House and to Mr. Hundley an itemization of the exhibits that would—could be referred to in the testimony today by description, in reference to the Senate record, volume, and part, and description of the particular exhibit.

For example, we referenced as an exhibit the deposition of Vernon Jordan and exhibits thereto, which was taken—which is in Senate record, Volume IV, Part 2. We did not put the page citation to the deposition of Vernon Jordan and the exhibits, but, of course, that is very bulky and would encompass, I think, about 200 pages for that...
particular deposition, and so on through the itemization
that was submitted to the White House and to Mr. Hundley.

Subsequent to that--and we were not aware, Senator
Thompson, of the ruling that was made at the deposition
yesterday. When Ms. Mills called and advised us of that
issue and requested the page citations, we set about doing
that, along with the actual copies of the exhibits, and that
was not available until a little after 8:00 last night
because, understandably, they were--had left the White
House, that was not delivered to them at that point.

SENATOR THOMPSON: If I might interject at that
point, I don't want to create an issue where there's not
one. I do believe that the objection of counsel for the
White House is a good one. I don't--I don't believe that a
general reference, such as you described, really complies
with the rule, but, as I understand it--and I think we
would—we would want to make any accommodation to you,
however, to—if actual notice is provided and time enough is
given to opposite counsel, I think it is probably something
we could work out, but as I understand it, counsel is—is
agreeable to go forward.

If counsel needs any time as we proceed with these
exhibits, then please tell us. We'll give you any
reasonable time that you might need with regard to these
exhibits, and I will state again today what evidently was
ruled yesterday. And I've conferred with Senator Dodd on
this previous, and I believe I'm speaking for him, too, that
we should--we should go on notice from here on that we do
need to comply with that more specifically in terms of
providing actual copies of the exhibits as far as tomorrow's
deposition is concerned.

So let's--let's proceed. The point is--is noted,
well taken, and as we proceed, as I indicated, if some time
is needed to go over these exhibits, we can accommodate
that.

Senator Dodd?

SENATOR DODD: Yeah. I agree with what Senator
Thompson has said and would just note for the record that I
was at the deposition yesterday. I counted some eight
members of the House Managers team who were here for that
deposition. And certainly, given the fact that it was a
problem yesterday or matter that did not become an issue--it
was resolved to the satisfaction of everyone--I would just
urge today, House Manager Hutchinson, that whatever
communications you may need to make to the other Managers
that we not have a repeat performance of this tomorrow when
we come in here. So I agree otherwise with Senator
Thompson.

MR. HUNDELEY: We certainly concur. We received
them, I think, 10 o'clock last night, and we're ready to
proceed and we want to proceed.

SENATOR THOMPSON: All right. And same as I indicated to House counsel, Mr. Hundley, if you need time as we proceed with any--any document, just please inform us and we'll make that available to you.

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

SENATOR THOMPSON: All right. If there are no further questions from the parties or counsel for the witness, I'll now swear in the witness. Mr. Jordan, will you please raise your right hand?

Do you, Vernon E. Jordan, Jr., swear that the evidence you shall give in this case now pending between the United States and William Jefferson Clinton, President of the United States, shall be the truth, the whole truth, and nothing but the truth, so help you, God?

THE WITNESS: I do.

Whereupon,

VERNON E. JORDAN, JR.

was called as a witness and, after having been first duly sworn by Senator Fred Thompson, was examined and testified as follows:

SENATOR THOMPSON: All right. The House Managers may begin their questioning of the witness.

MR. HUTCHINSON: Thank you, Senator Thompson and Senator Dodd.

EXAMINATION BY HOUSE MANAGERS

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

A I believe that's correct.

Q And, Mr. Jordan, what is your profession?

A I am a lawyer.

Q And where do you practice your profession?


Q And how long have you been a senior partner?

A I have been a senior partner--well, I didn't start out as a senior partner. I started out as a partner, and at some point--I don't know when, but not long thereafter I was elevated to this position of senior partner.

Q And what type of law do you practice?

A I am a corporate international generalist at Akin, Gump.

Q And does Akin, Gump have about 800 lawyers?

A We have about 800 lawyers, yes.

Q Which is an incredible number for lawyers from someone who practiced law in Arkansas.

How do all of those lawyers--

A We have some members of our law firm who are from Arkansas, so it's not unusual for them.

Q And how is it that you are able to obtain enough
business for 800 lawyers?

A I don't think that's my entire responsibility.

I'm just one of 800 lawyers, and that is what I do in part, but I'm not alone in that process of making rain.

Q When you say "making rain," that's the terminology of being a rainmaker?

A I think even in Arkansas, you understand what rainmaking is.

Q We've read Grisham books.

And so, when you say making rain or being a rainmaker, that is to bring in business so that you can keep the lawyers busy practicing law?

A Well, that is—that is part and parcel of the practice of law.

Q And do you bill by the hour?

A I do not.

Q And I understand you used to, but you do not anymore?

A I graduated.

Q A fortunate graduation.

And when the—when you did bill by the hour, what was your billable rate the last time you had to do that?

A I believe my billable rate at the last time was somewhere between 450 and 500 an hour.

Q Now, would you describe--
A Not bad for a Georgia boy. I'm from Georgia.
You've heard of that State, I'm sure.
Q It's probably not bad from Washington standards.
Would you describe the nature of your relationship
with President Clinton?
A President Clinton has been a friend of mine since
approximately 1973, when I came to your State, Arkansas, to
make a speech as president of the National Urban League
about race and equal opportunity in our Nation, and we met
then and there, and our friendship has grown and developed
and matured and he is my friend and will continue to be my
friend.
Q And just to further elaborate on that friendship,
it's my understanding that he and his--and the First Lady
has had Christmas Eve dinner with you and your family for a
number of years?
A Every year since his Presidency, the Jordan family
has been privileged to entertain the Clinton family on
Christmas Eve.
Q And has there been any exceptions in recent years
to that?
A Every year that he has been President, he has had,
he and his family, Christmas Eve with my family.
Q And have you vacationed together with the Clinton
family?
A Yes. I think you have seen reels of us playing
golf and having fun at Martha's Vineyard.
Q And so you vacation together, you play golf
together on a semi-regular basis?
A Whenever we can. We've not been doing it
recently, for reasons that I think are probably very obvious
to you, Counsel.
Q Well, explain that to me.
A Just what I said, for a time, I was going before
the grand jury, and under the advice of counsel and I'm sure
under advice of the President's counsel, it was thought best
that we not play golf together.

So, from the time that I first went to the grand
jury, I don't think—we have not played golf this year,
unfortunately, together.
Q Since you—I think your first appearance at the
grand jury was March 3 of '98. Then you went March 5, and
then in May, I believe you were two times before the grand
jury and then one in June of '98.

Since your last testimony before the grand jury in
June of '98, have you been in contact with the President of
the United States?
A Yes, I have.
Q And are these social occasions or for business
purposes?
A Social occasions. I was invited to the Korean State Dinner. I forget when that was. I think that was the first time I was in the White House since Martin Luther King Day of last year.

I saw the President at Martha's Vineyard. I was there when he got off Air Force One to greet him and welcome him to--to the Vineyard, and I was at the White House for one of the performances about music. The Morgan State Choir sang, and so I've been to the White House only for social occasions in the last year since Martin Luther King's birthday, I believe.

Q Have you had any private conversations with the President?

A Yes, I have, as a matter of fact.

Q And has this been on the telephone or in person?

A I've talked to him on the telephone, and I talked to him at the Vineyard. He was at my house on Christmas Eve. There were a lot of people around, but, yes, I've talked to the President.

Q And did you discuss your testimony before the grand jury or his testimony before the grand jury?

A I did not.

Q There was one reference that he made in his Federal grand jury testimony, and I'll refer counsel, if they would like. It was on page 77 of the President's
testimony in his appearance before the grand jury on August 17th.

And he referenced discussions with you, and he said, "I think I may have been confused in my memory because I've also talked to him on the phone about what he said, about whether he had talked to her or met with her. That's all I can tell you," and I believe the "her" is a reference to Ms. Lewinsky.

And it appeared to me from reading that, that there might have been some conversations with you by the President, perhaps in reference to your grand jury testimony or your knowledge of when and how you talked to Ms. Lewinsky.

A If I understand your question about whether or not the President of the United States and I talked about my testimony before the grand jury or his testimony before the grand jury, I can say to you unequivocally that the President of the United States and I have not discussed our testimony. I was advised by my counsel, Mr. Hundley, not to discuss that testimony, and I have learned in this process, Mr. Hutchinson, to--to take the advice of counsel.

Q I would certainly agree that that is good counsel to take, but going back to the question--and I will try to rephrase it because it was a very wordy question that I asked you--and it's clear from your testimony that you have
not discussed your grand jury testimony--

A  That is correct.

Q  --but did you, subsequent to your last testimony
before the grand jury, talk to the President in which you
discussed conversation that you have had with Monica
Lewinsky?

A  I have not discussed a conversation that I have
had with Monica Lewinsky with the President of the United
States.

Q  And have you had any discussions about Monica
Lewinsky with the President of the United States since your
last testimony before the grand jury?

A  I have not.

Q  Now, going back to your relationship with the
President, you have been described as a friend and advisor
to the President. Is that a fair terminology?

A  I think that’s fair.

Q  And in the advisor capacity, had you served as
co-chairman of the Clinton-Gore transition team in 1992?

A  I believe I was chairman.

Q  That is an important distinction.
And have you served in any other official or
semi-official capacities for this administration?

A  I have not, except that I was asked by the
President to lead the American delegation to the
inauguration of President Li in Taiwan, and that was about
as official as you can get, but that beyond that, I have
not--not had any official capacity.

For a very brief moment, very early in the
administration, I was appointed to the Foreign Intelligence
Advisory Committee, and I went to one meeting and stayed
half that meeting, went across the street and told Bruce
Lindsey that that was not for me.

Q    Now, let's move on. After we've established to a
certain degree your relationship with the President, let's
move on to January 20th of 1998, and just to put that in
clearer terms, this is a Tuesday after the January 17
deposition of President Clinton in the Paula Jones civil
rights case. Do you recall that time frame?

A    [Nodding head up and down.]

Q    This is in the afternoon of January 20th, again,
after the President's deposition. You contacted Mr. Howard
Gittis, who I believe is General Counsel of McAndrews &
Forbes Holdings?

A    Howard Gittis is Vice Chairman of McAndrews,
Forbes, and he is not the General Counsel. He is a lawyer,
but he is not the General Counsel.

Q    And what was the purpose of you contacting Mr.
Howard Gittis on January 20th?

A    If I talked to Howard Gittis on the 20th, I don't
recall exactly what my conversation with Howard Gittis was about. I think it was a telephone call, maybe.

Q  And that's difficult. Let me see if I can't help you in that regard.

A  Right.

Q  Was the purpose of that call with Mr. Gittis to arrange breakfast the next morning on January 21st?

A  Yeah. I was in New York, and I did call Mr. Gittis and say--and as I remember, I had breakfast with him on the 21st, I believe. Yes, I did.

Q  And this is a breakfast that you had set up?

A  Yes.

Q  And what was the reason you made the decision to request a breakfast meeting with Mr. Gittis?

A  Yes. As I remember, I had gotten a telephone call from David Bloom at 1 o'clock in the morning at the St. Regis Hotel about the matter that was about to break having to do with the entire Lewinsky matter, and I had not at any time discussed the Lewinsky matter with--with Howard Gittis. And so I had breakfast with him to tell him that reporters were calling, that this would obviously involve Revlon, which had responded to my--my efforts to find Ms. Lewinsky employment, and so Howard Gittis is a friend of mine. Howard Gittis is a fellow board member with me at Revlon. He is the Vice Chairman of McAndrews & Forbes, and I thought...
it—I thought I had—it was incumbent upon me to stop and say, "Listen, there's trouble a-brewing."

Q And just—you've mentioned McAndrews & Forbes and Revlon. McAndrews & Forbes, am I correct, is the parent company of--

A It's the holding company.

Q The holding company of Revlon and presumably other companies.

And you sit on the board of McAndrews & Forbes?

A I do not. I sit on the board of Revlon.

Q All right. And that is a position that brings you an annual salary--

A There is a director's fee.

Q You receive a director's fee, and in addition, your law firm receives—from business from--

A We do--

Q --Revlon?

A We do. We do business. We've represented Revlon, and we represented Revlon before I was elected a director.

Q And you mention that things were breaking that you felt like you needed to advise Mr. Gittis concerning. At the time that you made the arrangements for the breakfast on January 21st, had you become aware of the Drudge Report?

A Yes, I had.

Q And you had had lunch with Bruce Lindsey on
January 20th?

A No. I don't think it was on January--it was on Sunday. No, that was not the 20th.

Q And during that luncheon, did you become aware of the Drudge Report--

A That is correct.

Q --and receive a copy of it?

A That is correct.

Q And that was from Bruce Lindsey?

A That is correct.

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

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

Q Was there some news stories that had mentioned your name in reference to Ms. Lewinsky and the President?

A I believe that my name has been an integral part of this process from the beginning.

Q And did you in fact have the breakfast meeting with Mr. Gittis?

A Yes, I did.

Q And what information did you convey to Mr. Gittis concerning Ms. Lewinsky at that breakfast meeting?

A I just simply said that the press was calling about Ms. Lewinsky; that while I had not dealt with him, I had dealt with Richard Halperin, I had dealt with Ronald Perelman. I had not dealt with him, but that he ought to
know and that I was sorry about this.
And I also said that it would probably be even
more complicated because early on I had referred Webb
Hubbell to them to be hired as counsel.

Q   And I want to get to that in just a moment, but
you indicated that you said you were sorry. Were you
referring to the problems that this might create for the
company?

A   Well, I was obviously concerned. I am a director.
I am their counsel. They’re my friends. And publicity was
breaking. I thought I had some responsibility to them to
give them a heads-up as to what was going on.

Q   Now, is it true that your efforts to find a job
for Ms. Lewinsky that you referenced in that meeting with
Mr. Gittis—were your efforts carried out at the request of
the President of the United States?

A   There is no question but that through Betty
Currie, I was acting on behalf of the President to get Ms.
Lewinsky a job. I think that’s clear from my grand jury
testimony.

Q   Okay. And I just want to make sure that that’s
firmly established. And in reference to your previous grand
jury testimony, you indicated, I believe, on May 28th, 1998,
at page 61, that “She”—referring to Betty Currie—“was the
one that called me at the behest of the President.”
A That is correct, and I think, Congressman, if in fact the President of the United States' secretary calls and asks for a request that you try to do the best you can to make it happen.

Q And you received that request as a request coming from the President?

A I--I interpreted it as a request from the President.

Q And then, later on in June of '98 in the grand jury testimony at page 45, did you not reference or testify that "The President asked me to get Monica Lewinsky a job"?

A There was no--there was no question but that he asked me to help and that he asked others to help. I think that is clear from everybody's grand jury testimony.

Q And just one more point in that regard. In the same grand jury testimony, is it correct that you testified that "He"--referring to the President--"was the source of it coming to my attention in the first place"?

A I may--if that is--if you--if it's in the--

Q It's at page 58 of the grand jury--

A I stand on my grand jury testimony.

Q All right. Now, during your efforts to secure a job for Ms. Lewinsky, I think you mentioned that you talked to Mr. Richard Halperin.

A Yes.
Q: And he is with McAndrews & Forbes?

A: Yes.

Q: And you also at one point talked to Mr. Ron Perelman; is that correct?

A: I made a call to Mr. Perelman, I believe, on the 8th of January.

Q: And he is the--

A: He is the chairman/CEO of McAndrews Forbes. He is a majority shareholder in McAndrews Forbes. This is his business.

Q: Now, at the time that you requested assistance in obtaining Ms. Lewinsky a job, did you advise Mr. Perelman or Mr. Halperin of the fact that the request was being carried out at the request of the President of the United States?

A: I don't think so. I may have.

Q: Well, the first answer you gave was "I don't think so." Now, in fact, you did not advise either Mr. Perelman or Mr. Halperin of that fact because am I correct that Mr. Perelman--or, excuse me, Mr. Gittis--expressed some concern that Revlon was never advised of that fact?

A: Then, uh, I cannot say, I guess, precisely that I told that "I am doing this for the President of the United States."

I do believe, on the other hand, that given the fact that she was in the White House, given the fact that
she had been a White House intern, I would not be surprised
if that was their understanding.

Q    Well, in your conversation with Mr. Halperin.
A    Yes—I'm certain I did not say that to Richard
Halperin.

Q    Okay. So there's no question that you did not
tell Mr. Halperin that you were acting at the request of the
President?
A    I'm fairly certain I did not.

Q    And in your conversation with Mr. Perelman, did
you indicate to him that you were calling—or you were
seeking—employment for Ms. Lewinsky at the request of the
President?
A    Yes—I don't think that I, that I made that
explicit in my conversation with Mr. Perelman, and I'm not
sure I thought it necessary to say "This is for the
President of the United States."

    By the same token, I would have had no hesitance
in doing that.

Q    Now, at the time that you had called Mr. Perelman,
which I believe you testified was in January of '98—
A    That's right.

Q    --I think you said January 8th—
A    Right.
Q    --you were aware at that time, were you not, that
Ms. Lewinsky had received a subpoena to give a deposition in the Jones versus Clinton case?
A That is correct.
Q At the time that you talked to Mr. Perelman requesting his assistance for Monica Lewinsky, did you advise Mr. Perelman of the fact that Ms. Lewinsky was under subpoena in the Jones case?
A I did not.
Q And when you--did Mr. Perelman, Mr. Gittis or Mr. Halperin ever express to you disappointment that they were not told of two facts--either of these two facts--one, that Ms. Lewinsky was being helped at the request of the President; and secondly, that she was known by you and the President to be under subpoena in that case?
A No.
Q Now, you are on the board of directors of Revlon.
A I am.
Q And how long have you been on the board of Revlon?
A I forget. Ten years, maybe.
Q And as a member of the board of directors, do you not have a fiduciary responsibility to the company?
A I do.
Q And how would you define a fiduciary responsibility?
A I define my fiduciary responsibility to the
company about company matters.

Q  And how would you define fiduciary responsibility
in reference to company matters?

A  Anything that has to do with the company, that I
believe in the interest of the company, I have some
fiduciary responsibility to protect the company, to help the
company in any way that I—that is possible.

Q  And is fiduciary responsibility sometimes
considered a trust relationship in which you owe a degree of
trust and responsibility to someone else?

A  I think—I think that "trust" and "fiduciary" are
probably synonymous.

Q  Okay. Do you believe that you were acting in the
company’s interest or the President’s interest when you were
trying to secure a job for Ms. Lewinsky?

A  Well, what I knew was that the company would take
care of its own interest. This is not the first time that I
referred somebody, and what I know is, is that if a person
being referred does not meet the standards required for that
company, I have no question but that that person will not be
hired. And so the referral is an easy thing to do; the
judgment about employment is not a judgment as a person
referring that I make. But I do have confidence in all of
the companies on whose boards that I sit that, regardless of
my reference, that as to their needs and as to their
expectations for their employees that they will make the right decisions, as happened in the American Express situation.

American Express called and said: We will not hire Ms. Lewinsky. I did not question it, I did not challenge it, because they understood their needs and their needs in comparison to her qualifications. They made a judgment. Revlon, on the other hand, made another judgment. I am not the employer, I am the referrer, and there is a major difference.

Q Now, going back to what you knew as far as information and what you conveyed to Revlon, you indicated that you did not tell Mr. Halperin that you were making this request or referral at the request of the President of the United States.

A Yes, and I didn't see any need to do that.

Q And then, when you talked to Mr.--

A Nor do I believe not saying that, Counselor, was a breach of some fiduciary relationship.

Q And when you had your conversation with Mr. Perelman--

A Right.

Q --at a later time--

A Right.

Q --you do not remember whether you told him--you do
not believe you told him you were calling for the President.

A I believe that I did not tell him.

Q --but you assumed that he knew?

A No. I did not make any assumptions, let me say.

I said: Ronald, here is a young lady who has been
interviewed. She thinks the interview has not gone well.
See what you can do to make sure that she is properly
interviewed and evaluated--in essence.

Q And did you reference her as a former White House
intern?

A Probably. I do not have a recollection of whether
I described her as a White House intern, whether I described
her as a person who had worked for the Pentagon. I said
this is a person that I have referred.

I think, Mr. Hutchinson, that I have sufficient,
uh, influence, shall we say, 'sufficient character, shall we
say, that people have been throughout my career able to take
my word at face value.

Q And so you didn't need to reference the President.
The fact that you were calling Mr. Perelman--

A That was sufficient.

Q --and asking for a second interview for Ms.

Lewinsky, that that should be sufficient?

A I thought it was sufficient, and obviously, Mr.
Perelman thought it was sufficient.

Q  And so there is no reason, based on what you told him, for him to think that you were calling at the request of the President of the United States?

A  I think that's about right.

Q  And so, at least with the conversation with Mr. Halperin and Mr. Perelman, you did not reference that you were acting in behalf of the President of the United States. Was there anyone else that you talked to at Revlon in which they might have acquired that information?

A  The only persons that I talked to in this process, as I explained to you, was Mr. Halperin and Mr. Perelman about this process. And it was Mr. Halperin who put the--who got the process started.

Q  So those are the only two you talked about, and you made no reference that you were acting in behalf of the President?

A  Right.

Q  Now, the second piece of information was the fact that you knew and the President knew that Ms. Lewinsky was under subpoena in the Jones case, and that information was not provided to either Mr. Halperin or to Mr. Perelman; is that correct?

A  That's correct.

Q  Now, I wanted to read you a question and answer of
Mr. Howard Gittis in his grand jury testimony of April 23, 1998.

The question was: "Now, you had mentioned before that one of the responsibilities of director is to have a fiduciary duty to the company. If it was the case that Ms. Lewinsky had been noticed as a witness in the Paula Jones case, and Vernon Jordan had known that, is that something that you believe as a person who works for McAndrews & Forbes, is that something that you believe that Mr. Jordan should have told you, or someone in the company, not necessarily you, but someone in the company, when you referred her for employment?"

His answer was "Yes."

Do you disagree with Mr. Gittis' conclusion that that was important information for McAndrews & Forbes?

A I obviously didn't think it was important at the time, and I didn't do it.

Q Now, in your previous answers, you reference the fact that you--

A I think, on the other hand, that had she been a defendant in a murder case and I knew that, then I probably wouldn't have referenced her. But her being a witness in a civil case I did not think important.

Q Despite the fact that you were acting at the request of the President, and this witness was potentially
adverse to the President's interest in that case?

A I didn't know that. I mean, I don't--I don't know what her position was or whether it was adverse or not.

Q All right. Mr. Jordan, prior to you answering that, did you get an answer from your attorney?

A My attorney mumbled something in my ear, but I didn't hear him.

MR. HUNDLEY: It was a spontaneous remark. I'll try to refrain.

MR. HUTCHINSON: I know that--

THE WITNESS: He does have a right to mumble in my ear, I think.

MR. HUNDLEY: I mumble too loud because I don't hear too well myself.

BY MR. HUTCHINSON:

Q Now, going back to a complicating factor in your conversation with Mr. Gittis and this embarrassing situation of the Lewinsky job, the complicating fact was that you had also helped Webb Hubbell get a job or consulting contracts with the same company; is that--

A Yes. You use the word "complicated." I did not view it as a complication. I viewed it as a, as another something that happened, and that that caused some embarrassment to the company, and here again, we were back for another embarrassment for the company, and I thought I
had a responsibility to say that.

Q    Would you explain how you helped Webb Hubbell secure a job or a contract with Revlon?

A    Yes. Webb Hubbell came to me after his resignation from the Justice Department. Webb and I got to be friends during the transition, and Webb came to me and he said, "I'm leaving the Justice Department," or "I've left the Justice Department"--I'm not sure which--and he said, "I really need work."

And I said, "Webb, I will do what I can to help you."

I called New York, made arrangements. I took Webb Hubbell to New York. We had lunch. I took him to the headquarters of McAndrews & Forbes at 62nd Street. I introduced him to Howard Gittis, Ronald Perelman, and I left.

Q    And did, subsequently, Mr. Hubbell obtain consulting contracts with Revlon?

A    Subsequently, Mr. Hubbell was hired, as I understand it, as outside counsel to McAndrews & Forbes, or Revlon, or some entity within the Perelman empire.

Q    And was that consulting contracts of about $100,000 a year?

A    I--I think so, I think so.

Q    And did you make other contacts with other
companies in which you had friends for assistance for Webb Rubbell?

A I did not.

Q And was the effort to assist Mr. Webb Rubbell during this time--was it after he left the Department of Justice and prior to the time that he pled guilty to criminal charges?

A That is correct.

Q And at the time you assisted Webb Rubbell by securing a job with Revlon for him, was he a potential adverse witness to the President in the ongoing investigation by the Independent Counsel?

A I don't know whether he was an adverse witness or not. What he was was my friend who had just resigned from the Justice Department, and he was out of work, and he asked for help, and I happily helped him.

Q And did you know at the time that he was a potential witness in the investigation by the OIC?

A I don't know whether I knew whether he was a potential witness or not. I simply responded to Webb Rubbell who was a friend in trouble and needing work.

Q Now, let's backtrack to the time when you first had any contact with Ms. Lewinsky. We've talked about this January 20-21st meeting with Mr. Gittis and covered a little bit of the tail end of this entire episode. Now I would
like to go back in time to your first meetings with Ms. Lewinsky.

Now, when was the first time that you recall that you met with Monica Lewinsky?

A. If you've read my grand jury testimony--

Q. I have.

A. --and I'm sure that you have--there is testimony in the grand jury that she came to see me on or about the 8th of November. I have no recollection of that. It was not on my calendar, and I just have no recollection of her visit. There is a letter here that you have in evidence, and I have to assume that in fact that happened. But as I said in my grand jury testimony, I'm not aware of it, I don't remember it--but I do not deny that it happened.

Q. And Ms. Lewinsky has made reference to a meeting that occurred in your office on November 5, and that's the meeting that you have no recollection of?

A. That is correct. We have no record of it in my office, and I just have no recollection of it.

Q. And in your first grand jury appearance, you were firm, shall I say, that the first time you met with Ms. Lewinsky, that it was on December 11th?

A. Yes. It was firm based on what my calendar told me, and subsequently to that, there has been a refreshing of my recollection, and I do not deny that it happened. By the
same token, I will tell you, as I said in my grand jury
testimony, that I did not remember that I had met with her.

Q And in fact today, the fact that you do not
dispute that that meeting occurred is not based upon your
recolletion but is simply based upon you’ve seen the
records, and it appears that that meeting occurred?

A That is correct.

Q Okay. And you’ve made reference to my first
exhibit there, which is front of you, and I would refer you
to this at this time, which is Exhibit 86.

Now, this is captioned as a “Letter from Ms.
Lewinsky to Mr. Vernon Jordan dated November 6, 1997,” and
it appears that this letter thanks you for meeting with her
in reference to her job search. And do you recall this--

MR. KENDALL: Mr. Hutchinson, excuse me. May I
ask--this is an unsigned copy. Do you have a signed copy of
this letter?

MR. HUTCHINSON: Let me go through my questions if
I might.

BY MR. HUTCHINSON:

Q Do you recall receiving this letter?

A I do not.

Q Do you ever recall seeing this letter before?

A The first time I saw this letter was when I was
before the grand jury.
Q. And am I correct that it's your testimony that the first time you ever recall hearing the name "Monica Lewinsky" was in early December of '97?

A. That's correct. I--I may have heard the name before, but the first time I remember seeing her and having her in my presence was then.

Q. Well, regardless of whether you met with her in November or not, the fact is you did not do anything in November to secure a job for Ms. Lewinsky until your activities on December 11 of '97?

A. I think that's correct.

Q. And on December 11, I think you made some calls for Ms. Lewinsky on that particular day?

A. I believe I did. I have some--it's all right for me to refresh my recollection?

Q. Certainly.

A. Thank you. [Perusing documents.] I did make calls for her on the 11th, yes.

Q. And may I just ask what you're referring to?

A. I'm referring here to telephone logs prepared by counsel here for me to refresh my recollection about calls.

MR. HUDSON: You are welcome to have a copy of that.

THE WITNESS: You are welcome to see it.

MR. HUTCHINSON: Do you have an extra copy?
THE WITNESS: Yes—in anticipation.

MR. HUNDELY: There are a few calls.

SENATOR THOMPSON: Might this be a good time to take a 5-minute break?

MR. HUTCHINSON: Certainly.

SENATOR THOMPSON: All right. Let’s adjourn for 5 minutes.

THE VIDEOGRAPHER: We are going off the record at 10:03 a.m.

[Recess.]

THE VIDEOGRAPHER: We’re going back on the record at 10:16 a.m.

SENATOR THOMPSON: All right. Counsel has consumed 36 minutes.

Counsel, would you proceed?

MR. HUTCHINSON: Thank you, Senator Thompson.

At this time, I would offer as Jordan Deposition Exhibit 86, if you don’t mind me going by that numerology—

SENATOR THOMPSON: Would it be better to do that or make it Jordan Exhibit Number 1? Does counsel have any preference on that—is that—

MR. HUTCHINSON: One is fine.

SENATOR THOMPSON: Let’s do it that way. It will be made a part of the record, Jordan Deposition Number 1.

[Jordan Deposition Exhibit No.
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
believe--would you dispute if the record shows that you
received the resume of Ms. Lewinsky on December 8th?
A  I would not.
Q  And presumably, the meeting on December 11th was
set up somewhere around December 8th by the call from Ms.
Lewinsky?
A  I--I would not dispute that, sir.
Q  All right. Now, you mentioned that she had sent
you a--I guess some people refer to it--a wish list, or a
list of jobs that she--
A  Not jobs--companies.
Q  --companies that she would be interested in
seeking employment with.
A  That's correct.
Q  And you looked at that, and you determined that
you wanted to go with your own list of friends and companies
that you had better contacts with.
A  I'm sure, Congressman, that you too have been in
this business, and you do know that you can only call people
that you know or feel comfortable in calling.
Q  Absolutely. No question about it. And let me
just comment and ask your response to this, but many times I
will be listed as a reference, and they can take that to any
company. You might be listed as a reference and the name
"Vernon Jordan" would be a good reference anywhere, would it
not?

A I would hope so.

Q And so, even though it was a company that you might not have the best contact with, you could have been helpful in that regard?

A Well, the fact is I was running the job search, not Ms. Lewinsky, and therefore, the companies that she brought or listed were not of interest to me. I knew where I would need to call.

Q And that is exactly the point, that you looked at getting Ms. Lewinsky a job as an assignment rather than just something that you were going to be a reference for.

A I don't know whether I looked upon it as an assignment. Getting jobs for people is not unusual for me, so I don't view it as an assignment. I just view it as something that is part of what I do.

Q You're acting in behalf of the President when you are trying to get Ms. Lewinsky a job, and you were in control of the job search?

A Yes.

Q Now, going back--going to your meeting that we're talking about on December 11th, prior to the meeting did you make any calls to prospective employers in behalf of Ms. Lewinsky?

A I don't think so. I think not. I think I wanted
to see her before I made any calls.

Q    And so if they were not before, after you met with
her, you made some calls on December 11th?

A    I--I believe that's correct.

Q    And you called Mr. Richard Halperin of McAndrews &
Forbes?

A    That's right.

Q    You called Mr. Peter--

A    Georgescu.

Q    --Georgescu. And he is with what company?

A    He is chairman and chief executive officer of
Young & Rubicam, a leading advertising agency on Madison
Avenue.

Q    And did you make one other call?

A    Yes. I called Ursie Fairbairn, who runs Human
Resources at American Express, at the American Express
Company, where I am the senior director.

Q    All right. And so you made three calls on
December 11th. You believe that they were after you met
with Ms. Lewinsky--

A    I doubt very seriously if I would have made the
calls in advance of meeting her.

Q    And why is that?

A    You sort of have to know what you're talking
about, who you're talking about.
Q And what did you basically communicate to each of
these officials in behalf of Ms. Lewinsky?
A I essentially said that you're going to hear from
Ms. Lewinsky, and I hope that you will afford her an
opportunity to come in and be interviewed and look favorably
upon her if she meets your qualifications and your needs for
work.
Q Okay. And at what level did you try to communicate
this information?
A By--what do you mean by "what level"?
Q In the company that you were calling, did you call
the chairman of human resources, did you call the CEO--who
did you call, or what level were you seeking to talk to?
A Richard Halperin is sort of the utility man; he
does everything at McAndrews & Forbes. He is very close to
the chairman, he is very close to Mr. Gittis. And so at
McAndrews & Forbes, I called Halperin.

As I said to you, and as my grand jury testimony
shows, I called Young & Rubicam, Peter Georgescu as its
chairman and CEO. I have had a long-term relationship with
Young & Rubicam going back to three of its CEOs, the first
being Edward Ney, who was chairman of Young & Rubicam when I
was head of the United Negro College Fund, and it was during
that time that we developed the great theme, "A mind is a
terrible thing to waste." So I have had a long-term
relationship with Young & Rubicam and with Peter Georgescu, so I called the chairman in that instance. At American Express, I called Ms. Ursie Fairbairn who is, as I said before, in charge of Human Resources. So that is the level--in one instance, the chairman; in one instance a utilitarian person; and in another instance, the head of the Human Resources Department.

Q And the utilitarian connection, Mr. Richard Halperin, was sort of an assistant to Mr. Ron Perelman?
A That's correct. He's a lawyer.

Q Now, going to your meeting on December 11th with Ms. Lewinsky, about how long of a meeting was that?
A I don't--I don't remember. You have a record of it, Congressman.

Q And actually, I think you've testified it was about 15 to 20 minutes, but don't hold me to that, either. During the course of the meeting with Ms. Lewinsky, what did you learn about her?
A Uh, enthusiastic, quite taken with herself and her experience, uh, bubbly, effervescent, bouncy, confident, uh--actually, I sort of had the same impression that you House Managers had of her when you met with her. You came out and said she was impressive, and so we come out about the same place.
Q And did she relate to you the fact that she liked being an intern because it put her close to the President?
A I have never seen a White House intern who did not like being a White House intern, and so her enthusiasm for being a White House intern was about like the enthusiasm of White House interns—they liked it.
She was not happy about not being there anymore—she did not like being at the Defense Department—and I think she actually had some desire to go back. But when she actually talked to me, she wanted to go to New York for a job in the private sector, and she thought that I could be helpful in that process.
Q Did she make reference to someone in the White House being uncomfortable when she was an intern, and she thought that people did not want her there?
A She felt unwanted—there is no question about that. As to who did not want her there and why they did not want her there, that was not my business.
Q And she related that—
A She talked about it.
Q —experience or feeling to you?
A Yes.
Q Now, your meeting with Ms. Lewinsky was on December 11th, and I believe that Ms. Lewinsky has testified that she met with the President on December 5—excuse me, on
December 6--at the White House and complained that her job
search was not going anywhere, and the President then talked
to Mr. Jordan.

Do you recall the President talking to you about
that after that meeting?

A I do not have a specific recollection of the
President saying to me anything about having met with Ms.
Lewinsky. The President has never told me that he met with
Ms. Lewinsky, as best as I can recollect. I--I am aware
that she was in a state of anxiety about going to work. She
was in a state of anxiety in addition because her lease at
Watergate, at the Watergate, was to expire December 31st.

And there was a part of Ms. Lewinsky, I think, that thought
that because she was coming to me, that she could come today
and that she would have a job tomorrow. That is not an
unusual misapprehension, and it's not limited to White House
interns.

Q I mentioned her meeting with the President on the
same day, December 6th. I believe the record shows the
President met with his lawyers and learned that Ms. Lewinsky
was on the Jones witness list. Now, did you subsequently
meet with the President on the next day, December 7th?

A I may have met with the President. I'd have to--I
mean, I'd have to look. I'd have to look. I don't know
whether I did or not.
Q If you would like to confer--I believe the record shows that, but I'd like to establish that through your testimony.

MS. WALDEN: Yes.

THE WITNESS: Yes.

BY MS. HUTCHINSON:

Q All right. So you met with the President on December 7th. And was it the next day after that, December 8th, that Ms. Lewinsky called to set up the job meeting with you on December 11th?

A I believe that is correct.

Q And sometime after your meeting on December 11th with Ms. Lewinsky, did you have another conversation with the President?

A Uh, you do understand that conversations between me and the President, uh, was not an unusual circumstance.

Q And I understand that--

A All right.

Q --and so let me be more specific. I believe your previous testimony has been that sometime after the 11th, you spoke with the President about Ms. Lewinsky.

A I stand on that testimony.

Q All right. And so there's two conversations after the witness list came out--one that you had with the President on December 7th, and then a subsequent
conversation with him after you met with Ms. Lewinsky on the
11th.

Now, in your subsequent conversation after the
11th, did you discuss with the President of the United
States Monica Lewinsky, and if so, can you tell us what that
discussion was?

A If there was a discussion subsequent to Monica
Lewinsky's visit to me on December the 11th with the
President of the United States, it was about the job search.

Q And during that, did he indicate that
he knew about the fact that she had lost her job in the
White House, and she wanted to get a job in New York?

A He was aware that--he was obviously aware that she
had lost her job in the White House, because she was working
at the Pentagon. He was also aware that she wanted to work
in New York, in the private sector, and understood that
that is why she was having conversations with me. There is
no doubt about that.

Q And he thanked you for helping her?

A There's no question about that, either.

Q And on either of these conversations that I've
referenced that you had with the President after the witness
list came out, your conversation on December 7th, and your
conversation sometime after the 11th, did the President tell
you that Ms. Monica Lewinsky was on the witness list in the
Jones case?

A He did not.

Q And did you consider this information to be important in your efforts to be helpful to Ms. Lewinsky?

A I never thought about it.

Q Was there a time that you became aware that Ms. Lewinsky had been subpoenaed to give a deposition in the Jones versus Clinton case?

A On December 19th when she came to my office with the subpoena—I think it’s the 19th.

Q That’s right. Now, you indicated you never thought about it, because of course, at that point, you didn’t know that she was on the witness list, according to your testimony.

A [Nodding head up and down.]

Q Now, you said that she came to see you on December 19th—I’m sorry. I’ve been informed you didn’t respond out loud, so—

A Well, if you’d ask the question, I’d be happy to respond.

Q I was afraid you would ask me to ask the question again.

A Fine.

Q How did it come about that you met with Ms.
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  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. 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.
Q  Now, we're talking about December 19th, that you
had received a call from Monica Lewinsky; she had been
subpoenaed in the Jones case. She was upset. You said,
Come to my office.

Now, when she got to the office, I asked you,
actually, before that, what was your reaction to her having
this subpoena, and she had a problem because of the
subpoena.

A  Yes.

Q  And I believe you previously indicated that any
time a witness gets a subpoena, they've got a problem that
they would likely need legal assistance.

A  That's been my experience.

Q  And in fact she did subsequently come to see you
at the office on that December 19th, is that correct?

A  That's correct.

Q  And what happened at that meeting in your office
with Ms. Lewinsky on the 19th?

A  She, uh, as I said, was quite emotional. She was-
she was disturbed about the subpoena. She was disturbed
about not having, in her words, heard from the President or
talked to the President.

It was also in that meeting that it became clear
to me that the--that her eyes were wide and that she, uh,
that--let me--for lack of a better way to put it, that she
had a "thing" for the President.

Q    And how long was that meeting?
A    I don't know, uh, but it's in the record.

MR. HUndley: You testified 45 minutes.

THE WITNESS: Forty-five minutes. Thank you.

MR. HUTCHINSON: Thank you.

MR. HUNDLEY: Is that okay if I--

MR. HUTCHINSON: That's all right, and that's

helpful, Mr. Hundley.

MR. HUNDLEY: Thank you. I'm trying to be

helpful.

BY MR. HUTCHINSON:

Q    And during this meeting, did she in fact show you
the subpoena that she had received in the Jones litigation?
A    I'm sure she showed me the subpoena.

Q    And the subpoena that was presented to you asked
her to give a deposition, is that correct?
A    As I recollect.

Q    But did it also ask Ms. Lewinsky or direct her to
produce certain documents and tangible objects?
A    I think, if I'm correct in my recollection, it
asked that she produce gifts.

Q    Gifts, and some of those gifts were specifically
enumerated.

A    I don't remember that. I do remember gifts.
Q And did you discuss any of the items requested under the subpoena?
A I did not. What I said to her was that she needed counsel.
Q Now, just to help you in reference to your previous grand jury testimony of March 3, '98--and if you would like to refer to that, page 121, but I believe it was your testimony that you asked her if there had been any gifts after you looked at the subpoena.
A I may have done that, and if I--if that's in my testimony, I stand by it.
Q And did she--from your conversation with her, did you determine that in your opinion, there was a fascination on her part with the President?
A No question about that.
Q And I think you previously described it that she had a "thing" for the President?
A "Thing," yes.
Q And did you make any specific inquiry as to the nature of the relationship that she had with the President?
A Yes. At some point during that conversation, I asked her directly if she had had sexual relationships with the President.
Q And is this not an extraordinary question to ask a 24-year-old intern, whether she had sexual relations with
the President of the United States?
A  Not if you see—not if you had witnessed her
emotional state and this "thing," as I say. It was not.
Q  And her emotional state and what she expressed to
you about her feelings for the President is what prompted
you to ask that question?
A  That, plus the question of whether or not the
President at the end of his term would leave the First Lady;
and that was alarming and stunning to me.
Q  And she related that question to you in that
meeting on December 19th?
A  That's correct.
Q  Now, going back to the question in which you asked
her if she had had a sexual relationship with the President,
what was her response?
A  No.
Q  And I'm sure that that was not an idle question on
your part, and I presume that you needed to know the answer
for some purpose.
A  I wanted to know the answer based on what I had
seen in her expression; obviously, based on the fact that
this was a subpoena about her relationship with the
President.
Q  And so you felt like you needed to know the answer
to that question to determine how you were going to handle
the situation?

A No. I thought it was a factual data that I needed
to know, and I asked the question.

Q And why did you need to know the answer to that
question?

A I am referring this lady, Ms. Lewinsky, to various
companies for jobs, and it seemed to me that it was
important for me to know in that process whether or not
there had been something going on with the President based
on what I saw and based on what I heard.

Q And also based upon your years of experience--I
mean your--

A I don't understand that question.

Q Well, you have children?

A I have four children; six grandchildren.

Q And you’ve raised kids, you’ve had a lot of
experiences in life, and do you not apply that knowledge and
experience and wisdom to circumstances such as this?

A Yes. I’ve been around, and I’ve seen young
people, both men and women, overly excited about older,
mature, successful individuals, yes.

Q Now, let me just go back as to what signals that
you might have had at this particular point that there was a
sexual relationship between Ms. Lewinsky and the President.
Was one of those the fact that she indicated that she had a
fascination with the President?

A Yes.

Q And did she relate that "He doesn't call me enough"?

A Yes.

Q And was the fact that there was an exchange of gifts a factor in your consideration?

A Well, I was not aware that there had been an exchange of gifts. I thought it a tad unusual that there would be an exchange of gifts, uh, but it was just clear that there was a fixation by this young woman on the President of the United States.

Q And was it also a factor that she had been issued a subpoena in a case that was rooted in sexual harassment?

A Well, it certainly helped.

Q And that was an ingredient that you factored in and decided this is a question that needed to be asked?

A There's no question about that.

Q Now, heretofore, the questions or the discussions with Ms. Lewinsky had simply been about a job?

A Had been about a job.

Q And I think you indicated that you didn't have to be an Einstein to know that this was a question that needed to be asked after what you learned on this meeting?

A Yes, based on my own judgment, that is correct.
Q Now, at this point, you're assisting the President in obtaining a job for a former intern, Monica Lewinsky?

A Right.

Q It comes to your attention from Ms. Lewinsky that she has a subpoena in a civil rights case against the President. And did this make you consider whether it was appropriate for you to continue seeking a job for Ms. Lewinsky?

A Never gave it a thought.

Q Despite the fact that you were seeking the job for Ms. Lewinsky at the request of the President when she is under subpoena in a case adverse to the President?

A I--I did not give it a thought. I had committed that I was going to help her, and I was going to--and I kept my commitment.

Q And so, however she would have answered that question, you would have still prevailed upon your friends in industry to get a job for her?

A Congressman, that is a hypothetical question, and I'm not going to answer a hypothetical question.

Q Well, I thought you had answered it before, but if--so you don't know whether it would have made a difference or not, then?

A I asked her whether or not she had had sexual relationships with the President. Ms. Lewinsky told me no.
MR. HUNLEY: I'd just like to interject. My recollection, Congressman, is that in the grand jury, he gave basically the same answer, that it was a hypothetical question, and that he really didn't know what he would have done had the answer been different. You could double-check it if you want, but I'm sure I'm right.

BY MR. HUTCHINSON:

Q Okay, I'm not asking you a hypothetical question. I want to ask it in this phrase, in this way. Did her answer make you consider whether it was appropriate for you to continue seeking a job for Ms. Lewinsky at the request of the President?

A I did not see any reason why I should not continue to help her in her job search.

Q Now, was the fact that she was under subpoena important information to you?

A It was additional information, certainly.

Q If you were trying to get Ms. Lewinsky a job, did you expect her to tell you if she had any reason to believe she might be a witness in the Jones case?

A She did in fact tell me by showing me the subpoena. I had no expectations one way or the other.

Q Well, I refer you to your grand jury testimony of March 3, '98 at page 96. Do you recall the answer: "I just think that as a matter of openness and full disclosure that
she would have done that.*

A And she did.

Q Precisely. She disclosed to you, of course, when she received the subpoena, and that's information that you expected to know and to be disclosed to you?

A Fine.

Q Is--

A Yes. Fine.

Q And in fact, if Ms. Currie—I'm talking about Betty Currie—if she had known that Ms. Lewinsky was under subpoena, you would have expected her to tell you that information as well since you were seeking employment for Ms. Lewinsky?

A Well, it would have been fine had she told me. I do make a distinction between being a witness on the one hand and being a defendant in some sort of criminal action on the other. She was a witness in the civil case, and I don't believe witnesses in civil cases don't have a right for—to employment.

Q Okay. I refer you to page 95 of your grand jury testimony, in which you said: "I believe that had Ms. Currie known, that she would have told me."

And the next question: "Let me ask the question again, though. Would you have expected her to tell you if she knew?"
And do you recall your answer?

A I don't.

Q "Yes, sure."

A I stand by that answer.

Q And so it's your testimony that if Ms. Currie had known that Ms. Lewinsky was under subpoena, you would have expected her to tell you that information?

A It would have been helpful.

Q And likewise, would you have expected the President to tell you if he had any reason to believe that Ms. Lewinsky would be called as a witness in the Paula Jones case?

A That would have been helpful, too.

Q And that was your expectation, that he would have done that in your conversations?

A It--it would certainly have been helpful, but it would not have changed my mind.

Q Well, being helpful and that being your expectation is a little bit different, and so I want to go back again to your testimony on March 3, page 95, when the question is asked to you--question: "If the President had any reason to believe that Ms. Lewinsky could be called a witness in the Paula Jones case, would you have expected him to tell you that when you spoke with him between the 11th and the 19th about her?"
And your answer: "And I think he would have."

A My answer was yes in the grand jury testimony, and my answer is yes today.

Q All right. So it would have been helpful, and it was something you would have expected?

A Yes.

Q And yet, according to your testimony, the President did not so advise you of that fact in the conversations that he had with you on December 7th and December 11th after he learned that Ms. Lewinsky was on the witness list?

A As I testified--

MR. KENDALL: Objection. Misstates the record with regard to December 11th.

MR. HUTCHINSON: I--I will restate the question. I believe it accurately reflects the record, and I'll ask the question.

BY MR. HUTCHINSON:

Q And yet, according to your testimony, the President did not so advise you of the fact that Ms. Lewinsky was on the witness list despite the fact that he had conversations with you on two occasions, on December 7th and December 11th?

A I have no recollection of the President telling me about the witness list.
Q And during this meeting with Ms. Lewinsky on the
11th, did you take some action as a result of what she told
you?
A On the 11th or the 18th?
Q Excuse me. I'm sorry. Let me go to the 19th.
A Nineteenth.
Q Thank you for that correction.
Did you refer her to an attorney?
A Yes, I did.
Q Okay, and who was the attorney that you referred
her to?
A Frank Carter, a very able local attorney here.
Q And did you give her two or three attorneys to
select from, or did you just give her one recommendation?
A I made a recommendation of Frank Carter. That was
the only recommendation.
Q Now, let me go to I believe it's the next three
exhibits that are in front of you, if you'd just turn that
first page, and I believe they are marked 29, 31, 32 and 33.
And these are, I believe, exhibits that you have seen before
and are summaries and documents relating to telephone
conversations on this particular day of December 19th.
(Witness perusing documents.)
SENATOR DODD: How are these going to be marked--
as Jordan Deposition Exhibits--
MR. HUTCHINSON: These should be marked as
Exhibits 2, 3, and 4.

SENIOR DODD: Okay.

MR. KENDALL: Excuse me, Mr. Manager. Are you
offering these in evidence?

MR. HUTCHINSON: Not at this time.

I guess it’s 2, 3, 4 and 5.

SENIOR THOMPSON: Are we referring to the next
four exhibits in the package here?

MR. HUTCHINSON: Yes, sir.

SENIOR THOMPSON: Well, we’ll just--identify them
one at a time, and we’ll--

MR. HUTCHINSON: All right.

BY MR. HUTCHINSON:

Q Let’s go to Exhibit 29 as it’s marked, but for our
purpose, we’re going to refer to it as Deposition Exhibit 2.

SENIOR THOMPSON: All right. For identification
for right now, we’ll call that Jordan Exhibit Number 2 for
identification, which is marked as, I assume, Grand Jury
Exhibit Number 29.

[Jordan Deposition Exhibit No.
2 marked for identification.]

BY MR. HUTCHINSON:

Q And from this record, would you agree that you
received a call from Ms. Lewinsky at 1:47 p.m.?
A For 11 seconds.
Q All right. And subsequent to that, you placed a
call to talk to the President at 3:51 p.m. and talked to
Deborah Schiff?
A Yes.
Q And what was the purpose of that call to Deborah
Schiff?
A I---I'm certain that I did not call Deborah Schiff.
I had no reason to call Deborah Schiff. My suspicion was
that if I in fact called 1414, that somehow Deborah Schiff
was answering the telephone.
Q Were you trying to get hold of the President?
A I think maybe I was.
Q All right. And then, subsequent to that, Ms.
Lewinsky arrived in your office at 4:47 p.m.---and I believe
that would be reflected on Exhibit 3---excuse me---Exhibit 4.

MR. HUNTLEY: Four.
THE WITNESS: Yes.

BY MR. HUTCHINSON:
Q And does it also reflect, going back to the call
records, that you talked to the President during the course
of your meeting with Ms. Lewinsky at approximately 5:01
p.m.?
A I beg your pardon?

MR. HUTCHINSON: This would be Exhibit 5.
SENATOR THOMPSON: All right. Let’s mark these for identification purposes.

We have already identified Deposition Exhibit Number 29 as Exhibit Number 2 for identification in Mr. Jordan’s deposition.

The next one would be Grand Jury Exhibit Number 31, and we will mark that as Exhibit Number 3 for identification purposes. Following that will be Grand Jury Exhibit Number 32, that we will identify as Exhibit Number 4 to Mr. Jordan’s deposition for identification purposes; and Grand Jury Exhibit Number 33 will be Exhibit Number 5 to Mr. Jordan’s deposition for identification purposes.

Now, do we need to go any further at this time?

MR. HUTCHINSON: No. Thank you.

SENATOR THOMPSON: All right.

[Jordan Deposition Exhibit Nos. 3, 4 and 5 marked for identification.]

BY MR. HUTCHINSON:

Q Mr. Jordan--
A Yes.

Q --under Exhibit--
A Yes.

Q --according to these records, specifically Exhibit 5, does it reflect that you talked to the President during
the course of your meeting with Ms. Lewinsky at
approximately 5:01 p.m.?

MR. KENDALL: Object to the form of the question.

MR. HUTCHINSON: You may answer.

THE WITNESS: I'm confused.

MR. HUTCHINSON: There's an objection as to the
form of the question.

THE WITNESS: Oh.

SENATOR THOMPSON: We can resolve it.

MR. KENDALL: The question was do these records
indicate this. If he offers Number 2, I'm going to object
to it. It's not the best evidence. It's a chart. I don't
know who prepared it--

SENATOR THOMPSON: He's referring to 5 now, I
believe, isn't he?

MR. HUTCHINSON: Yes.

SENATOR THOMPSON: I believe this had to do with

5.

MR. HUTCHINSON: All right.

THE WITNESS: Would you ask your question?

BY MR. HUTCHINSON:

Q Mr. Jordan, I'm simply trying to establish, and
using Exhibit 5 to refresh your recollection--

MR. KENDALL: I withdraw the objection, I withdraw
the objection.
SENATOR THOMPSON: All right, sir; very fine.

MR. HUTCHINSON: Thank you.

BY MR. HUTCHINSON:

Q --that this record, Exhibit 5, reflects that you talked to the President during the course of your meeting with Ms. Lewinsky at approximately 5:01 p.m.

A Yes. I--I have never had a conversation with the President while Ms. Lewinsky was present. The wave-in sheet from my office said that she came in at 5:47--

Q Four forty-seven.

A --4:47. She may have been in the reception area, or she may have been outside my office, but Ms. Lewinsky was not in my office during the time that I had a conversation with the President.

Q And the other alternative would be that she came into your office, and then you excused her while you received a call from the President?

A That's a possibility, too--

Q All right.

A --but she was not present in my office proper during the time that I was having a conversation with the President.

Q Absolutely, and that is clear.

Now, because we got a little bogged down in the records, let me just go back for a moment. Is it your
understanding, based upon the records and recollection, that
you received a call from Ms. Lewinsky about 1:47; you talked
to Deborah Schiff trying to get hold of the President about
3:51 that afternoon; Ms. Lewinsky arrived at about 4:47 p.m.
A Yes.
Q Am I correct so far?
A Yes.
Q And then you received a call from the President at
about 5:01 p.m.?
A That’s correct.
MR. HUTCHINSON: I want to say "Your Honor"--I’ve
wanting to do this all day, Senator--I would offer these
Exhibits 2, 3, 4 and 5 at this time.
MR. KENDALL: I would object to the admission of
Exhibit Number 2.
SENATOR THOMSON: Mr. Hutchinson, could you
identify what this exhibit is from?
MR. HUTCHINSON: Well, this exhibit is a summary
exhibited based upon the original records that establish
this. Now, we’ve established it clearly through the
testimony, so it’s not of earth-shattering significance
whether this is in the record or not, because the witness
has established it.
SENATOR THOMSON: All right. But this is a
compilation of what you contend--
MR. HUTCHINSON: Yes.

SENATOR THOMPSON: --is otherwise in the record?

MR. HUTCHINSON: Yes.

SENATOR THOMPSON: Counsel, do we really have a problem with that?

MR. KENDALL: Senator Thompson, I don't know who prepared this or what records it's based on. I have not objected to any of the original records, and I'll continue my objection.

I'll sustain that.

SENATOR THOMPSON: I think in light of that we will sustain it, if Mr. Hutchinson thinks it's otherwise in the record anyway, and not make an issue out of that.

So we will, then, make as a part of the record Exhibits Numbers 3, 4 and 5 that have previously been introduced for identification purposes; they will now be made a part of the record.

MR. HUTCHINSON: Thank you, Senator.

[Jordan Deposition Exhibit Nos. 3, 4 and 5 received in evidence.]

BY MR. HUTCHINSON:

Q Now, Mr. Jordan, you indicated you had this conversation with the President at about 5:01 p.m. out of the presence of Ms. Lewinsky. Now, during this conversation with the President, what did you tell the President in that
conversation?

A That Lewinsky--I'm sure I told him that Ms. Lewinsky was in my office, in the reception area, that she had a subpoena and that I was going to visit with her.

Q And did you advise the President as well that you were going to recommend Frank Carter as an attorney?

A I may have.

Q And why was it necessary to tell the President these facts?

A I don't know why it was not unnecessary to tell him these facts. I was keeping him informed about what was going on, and so I told him.

Q Why did you make the judgment that you should call the President and advise him of these facts?

A I just thought he ought to know. He was interested in--he was obviously interested in it--and I felt some responsibility to tell him, and I did.

Q All right. And what was the President's response?

A He said thank you.

Q Subsequent to your conversation with the President about Monica Lewinsky, did you advise Ms. Lewinsky of this conversation with the President?

A I doubt it.

Q And if she indicates that she was not aware of that conversation, would you dispute her testimony in that
regard?

A I would not.

Q And you say that you doubt it. Was there a reason that you would not disclose to her the fact that you talked to the President when she was the subject of that conversation?

A No. I-I didn't feel any particular obligation to tell her or not to tell her, but I did not tell her.

Q Now, we have discussed to a limited extent the gifts that were mentioned in the subpoena in this discussion that you had with Ms. Lewinsky. Did she in fact tell you about the gifts she had received from the President?

A I think she told me that she had received gifts from the President.

Q Did she also indicate that there had been an exchange of gifts?

A She did.

Q And did you think that it was somewhat unusual that there had been an exchange of gifts?

A Uh, a tad unusual, I thought.

Q These--

A Which again occasioned the question.

Q Pardon?

A Which again occasioned the ultimate question.

Q On--on whether there was a sexual relationship?
A That is correct.
Q And so that was a significant fact in determining whether that question should be asked?
A It was an additional fact.
Q Now, the subpoena also references "documents constituting or containing communications between you"--
which would have been Ms. Lewinsky under the subpoena--"and the Defendant Clinton, including letters, cards, notes, et cetera."

Did you ask Ms. Lewinsky at all whether there were any kinds of cards or communications between them?
A Uh, I did not, but she may have volunteered that.
Q And did she tell you about telephone conversations with the President?
A She did tell me that she and the President talked on the telephone.
Q And did she express it in a way that it was frustrating because the President didn’t call her sufficiently?
A Well, that—that is correct, and she was disappointed, uh, and disapproving of the fact that she was not hearing from the President of the United States on a regular basis.
Q During this conversation with Ms. Lewinsky, she 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 asked if you thought that the President would leave the First Lady at the end of his term?
3 A That is correct.
4 Q And what was your reaction to this statement?
5 A My reaction to the statement after I got over it was that—no way.
6 Q Did it send off alarm bells in your mind as to her relationship with the President?
7 A I think it’s safe to say that she was not happy.
8 Q You’re speaking of Ms. Lewinsky?
9 A That’s the only person we’re talking about, Congressman.
10 Q Now, based upon all of this, was it your conclusion the subpoena meant trouble?
11 A Beg your pardon?
12 Q Based upon all of these facts and your conversation with Ms. Lewinsky, was it your conclusion that the subpoena meant trouble?
13 A Well, I always, based on my experience with the grand jury, believe that subpoenas are trouble.
14 Q I think you’ve used the language, "ipso facto" meant trouble?
15 A Yes, yes, right.
Q Now, subsequent to your meeting with Ms. Lewinsky on this occasion, did you in fact set up an appointment with Mr. Frank Carter?

A Yes—for the 22nd, I believe.

Q Which I believe would have been the first part of the next week?

A That's right.

Q And still on December 19th, after your meeting with Ms. Lewinsky, did you subsequently see the President of the United States later that evening?

A I did.

Q And is this when you went to the White House and saw the President?

A Yes.

Q At the time that Ms. Lewinsky came to see you on December 19th, did you have any plans to attend any social function at the White House that evening?

A I did not.

Q And in fact there was a social invitation that you had at the White House that you declined?

A I had—I had declined it; that's right.

Q And subsequent to Ms. Lewinsky visiting you, did you change your mind and go see the President that evening?

A After the—a social engagement that Mrs. Jordan and I had, we went to the White House for two reasons. We
went to the White House to see some friends who were there, two of whom were staying in the White House; and secondly, I wanted to have a conversation with the President.

Q And this conversation that you wanted to have with the President was one that you wanted to have with him alone?

A That is correct.

Q And did you let him know in advance that you were coming and wanted to talk to him?

A I told him I would see him sometime that night after dinner.

Q Did you tell him why you wanted to see him?

A No.

Q Now, was this--once you told him that you wanted to see him, did it occur the same time that you talked to him while Ms. Lewinsky was waiting outside?

A It could be. I made it clear that I would come by after dinner, and he said fine.

Q Now, let me backtrack for just a moment, because whenever you talked to the President, Ms. Lewinsky was not inside the room--

A That's correct.

Q --and therefore, you did not know the details about her questions on the President might leave the First Lady and those questions that set off all of these alarm
bells.
A [Nodding head up and down.]
Q And so you were having--is the answer yes?
A That's correct.
Q And so you were having this discussion with the President not knowing the extent of Ms. Lewinsky's fixation?
A Uh--
Q Is that correct?
A Correct.
Q And, regardless, you wanted to see the President that night, and so you went to see him. And was he expecting you?
A I believe he was.
Q And did you have a conversation with him alone?
A I did.
Q No one else around?
A No one else around.
Q And I know that's a redundant question.
A It's okay.
Q Now, would you describe your conversation with the President?
A We were upstairs, uh, in the White House. Mrs. Jordan--we came in by way of the Southwest Gate into the Diplomatic Entrance--we left the car there. I took the elevator up to the residence, and Mrs. Jordan went and
visited at the party. And the President was already
upstairs—I had ascertained that from the usher—and I went
up, and I raised with him the whole question of Monica
Lewinsky and asked him directly if he had had sexual
relations with Monica Lewinsky, and the President said, "No,
ever."

Q  All right. Now, during that conversation, did you
tell the President again that Monica Lewinsky had been
subpoenaed?

A  Well, we had established that.

Q  All right. And did you tell him that you were
cconcerned about her fascination?

A  I did.

Q  And did you describe her as being emotional in
your meeting that day?

A  I did.

Q  And did you relate to the President that Ms.
Lewinsky asked about whether he was going to leave the First
Lady at the end of the term?

A  I did.

Q  And as--and then, you concluded that with the
question as to whether he had had sexual relations with Ms.
Lewinsky?

A  And he said he had not, and I was satisfied—end
of conversation.
Q  Now, once again, just as I asked the question in reference to Ms. Lewinsky, it appears to me that this is an extraordinary question to ask the President of the United States. What led you to ask this question to the President?

A  Well, first of all, I'm asking the question of my friend who happens to be the President of the United States.

Q  And did you expect your friend, the President of the United States, to give you a truthful answer?

A  I did.

Q  Did you rely upon the President's answer in your decision to continue your efforts to seek Ms. Lewinsky a job?

A  I believed him, and I continued to do what I had been asked to do.

Q  Well, my question was more did you rely upon the President's answer in your decision to continue your efforts to seek Ms. Lewinsky a job.

A  I did not rely on his answer. I was going to pursue the job in any event. But I got the answer to the question that I had asked Ms. Lewinsky earlier from her, and I got the answer from him that night as to the sexual relationships, and he said no.

Q  It would appear to me that there's two options. One, you asked the question in terms of idle conversation, and that does not seem logical in view of the fact that you
made a point to go and visit the President about this alone.

A  Yes. I never said that--I never talked about
options. I told you I went to ask him that question.

Q  Well, was it idle conversation, or was there a
purpose in you asking him that question?

A  It obviously, Congressman, was not idle
conversation.

Q  All right.

A  For him nor for me.

Q  There was a purpose in it--and would you describe
it as being important, the question that you asked to him?

A  I wanted to satisfy myself, based on my visit with
her, that there had been no sexual relationships, and he
said no, as she had said no.

Q  And why was it important to you to satisfy
yourself on that particular point?

A  I had seen this young lady, and I had seen her
reaction, uh, and it raised a presumption, uh, and I wanted
to satisfy myself, as I had done with her, that there had
been no sexual relationship between them.

Q  If you had--

A  And I did satisfy myself.

Q  And if you had--well, let me rephrase it. If you
believed the presumption, or if you had evidence that Ms.
Lewinsky did have sexual relations with the President, would
this have affected your decision to act in the President's
interest in locating her a job when she had been subpoenaed
in a case adverse to the President?
   A I do not think it would have affected my decision.
   Q Now, you mentioned that you set up an appointment
for Ms. Lewinsky at the office of Frank Carter for December
22nd.
   A Right.
   Q Prior to that appointment with Mr. Carter, did Ms.
Lewinsky come to see you in your office?
   A I took Ms. Lewinsky from my office, in my Akin
Gump, chauffeur-driven car, to Frank Carter's office.
   Q And when she arrived at your office, did you have
a discussion with her?
   A I think I got my coat, she got her--she had on her
coat--and we left.
   Q While in your office before going to see Mr.
Carter, did Ms. Lewinsky ask about her job?
   A Every conversation that I had with Ms. Lewinsky
had at some point to do with pending employment.
   Q And I take that as a "yes" answer, but I would
also refer you to page 184 of your previous testimony in
which that answer was "yes."
   A Yes.
   Q And so prior to going to see Mr. Carter, you met
with Ms. Lewinsky and--where she asked about her job?

A  Well, as I'm putting on my coat, I mean, we did
not sit down and have a conference. We had an appointment.

Q  \^\  Now, you last testified before the grand jury in
June of 1998, and you have not had the opportunity to
address some issues that Ms. Lewinsky raised when she
testified before the grand jury in August of 1998, and I
would like to--there will be a number of questions as we go
through this today relating to some things that she
testified to, because it's important that we hear your
responses to it, and so I'd like to ask you about a couple
of these particular areas.

During this meeting--and you say it was a short
meeting, that you really didn't sit down--but during this
time, did Ms. Lewinsky ask if you had told the President
that she had been subpoenaed in the Jones case?

A  She may have, and--and if she did, I answered yes.

Q  Even though you did not tell her about the
conversation on December 19th that you had with the
President in which you told the President she had been
subpoenaed?

A  If she had asked, I would have told her. If she
asked me on the 22nd, I answered yes.

Q  And did Ms. Lewinsky show you any gifts that she
was bringing to Mr. Frank Carter?
A: Yeah. I'm not aware that Ms. Lewinsky showed me any gifts. I have no--I have no recollection of her having shown me gifts given her by the President. And my best recollection is that she came to my office, I got myself together, and that we left. I have no recollection of her showing me gifts given her by the President.

Q: Would you dispute if she in fact had gifts with her on that occasion?

A: I don't know whether she had gifts with her or not. I do have--I have no recollection of her showing me, saying, "This is a gift given me by the President of the United States."

Q: And if she testifies that she showed you the gifts she was bringing Mr. Carter, you would dispute that testimony?

A: I have no recollection of her showing me any gifts.

Q: And I take that as not denying it--

MR. KENDALL: Objection to form.

BY MR. HUTCHINSON:

Q: --but that you have no recollection.

A: Uh, I don't know how else to say it to you, Mr. Congressman.

Q: Well--

A: I have no recollection of Ms. Lewinsky coming to
my office and showing me gifts given her by the President of
the United States.

Q    Let me go on. Did Ms. Lewinsky tell you that she
and the President had had phone sex?

A    I think Ms.--I know Ms. Lewinsky told me about,
uh, telephone conversations with the President. If Ms.
Lewinsky had told me something about phone sex, I think I
would have remembered that.

Q    And therefore, if she testifies that she told you
that Ms. Lewinsky and the President had phone sex, then
you'd simply deny her testimony in that regard?

A    I--

MR. KENDALL: Object to the form.

THE WITNESS: I have no recollection, Congressman,
of Ms. Lewinsky telling me about phone sex--but given my
age, I would probably have been interested in what that was
all about.

SENATOR THOMPSON: We'll overrule the objection.
It's a leading question, but I think that it will be
permissible for these purposes.

MR. HUTCHINSON: It's my understanding, Senator,
that under the Senate rule, that the witness would be
considered an adverse witness.

SENATOR THOMPSON: That's correct.

BY MR. HUTCHINSON:
Q Well, I don't mean to engage in disputes over fine
points, but I guess--
A Well, you obviously, Congressman, have Ms.
Lewinsky saying one thing and me saying another. I stand by
what I said.
Q Which is that you have no recollection of that
discussion taking place.
A But I do think that I would have remembered it had
it happened.
Q All right. Now, after your brief encounter or
meeting with Ms. Lewinsky in your office, did you take Ms.
Lewinsky in your vehicle to Mr. Carter's office?
A Yes.
Q And when you arrived at Mr. Carter's office, did
you meet with Mr. Carter in advance, while Ms. Lewinsky
waited outside?
A I said a brief hello to him. We talked about
lunch. I never took off my coat. I did take off my hat,
because it was inside. And I left them, and I got a piece
of his candy.
Q Now, I was looking at the testimony of Mr. Carter.
Now, do you recall a meeting with Mr. Carter in his office
while Ms. Lewinsky waited outside, even if it might have
been a brief meeting?
A Yes, I think maybe I went in. I just don't know--
I was there for a very short time.

Q  Did you explain to Mr. Carter that you were seeking Ms. Lewinsky a job at the request of the President?

A  No, I did not, but I think he knew that.

Q  And why do you think he knew that?

A  I must have told him.

Q  So at some point, you believe that you told Mr. Carter that you were seeking Ms. Lewinsky a job at the request of the President?

A  I think I may have done that.

Q  Now, you have referred other clients to Mr. Carter during your course of practice here in Washington, D.C.?

A  Yes, I have.

Q  About how many have you referred to him?

A  Oh, I don't know. Maggie Williams is one client that I--I remember very definitely.

I like Frank Carter a lot. He's a very able young lawyer. He's a first-class person, a first-class lawyer, and he's one of my new acquaintances amongst lawyers in town, and I like being around him. We have lunch, and he's a friend.

Q  And is it true, though, that when you've referred other clients to Mr. Carter that you never personally delivered and presented that client to him in his office?

A  But I delivered Maggie Williams to him in my
office. I had Maggie Williams to come to my office, and it was in my office that I introduced, uh, Maggie Williams to Mr. Carter, and she chose other counsel. I would have happily taken Maggie Williams to his office.

Q But this is the only occasion that you took your Akin, Gump-chauffeured vehicle and delivered the client to Mr. Carter in his office?

A It was.

Q Now, we're not going to go through, probably to your relief, each day's phone calls, but is it safe to say that Ms. Lewinsky called you regularly, both keeping you posted on her interviews and contacts, but also asking you what you knew about her job desires?

A That is correct.

Q And it is also true that during this process, you kept the President informed?

A That, too, is correct.

Q And did the President ever give you any other instruction other than to find Ms. Lewinsky a job in New York?

A I do not view the President as giving me instructions. The President is a friend of mine, and I don't believe friends instruct friends. Our friendship is one of parity and equality.

Q Let me rephrase it, and that's--
A Thank you.

Q That's a fair comment that you certainly made.

Did you ever receive any other request from the President in reference to your dealing with Monica Lewinsky other than the request to find her a job in New York?

A That is correct.

MR. HUTCHINSON: I've been informed that there's a few minutes left on the tape. Do you want to break?

THE VIDEOGRAPHER: Yes.

SENATOR THOMPSON: All right. Let's take a 5-minute break at this point.

Also, if it's not objectionable to anyone, let's move a little closer to 1 o'clock, after all, for lunch, if that's okay. We have a conference that that will coincide with a little better, but for right now, let's take a 5-minute break.

SENATOR DODD: Just before we do, just to make it--and the admonition about these--these--this matter being in--confidential.

SENATOR THOMPSON: Right.

SENATOR DODD: And I'm going to restate that over and over again today, so that people understand the rules under which we're operating here, and this is confidential and no one is to reveal anything they hear, except to the people that was listed in Senator Thompson's opening
remar ks.

SENATOR THOMPSON: Absolutely.

We'll be in recess.

THE VIDEOGRAPHER: This marks the end of Videotape
Number 1 in the deposition of Vernon E. Jordan, Jr. We are
going off the record at 11:35 a.m.

[Recess.]

THE VIDEOGRAPHER: This marks the beginning of
Videotape Number 2 in the deposition of Vernon E. Jordan,
Jr. We are going back on the record at 11:49 a.m.

SENATOR THOMPSON: All right, Mr. Hutchinson, and
you have consumed an hour and 40 minutes.

MR. HUTCHINSON: Thank you, Senator Thompson.

BY MR. HUTCHINSON:

Q Mr. Jordan, I was reminded that the last question
I asked you received an answer that I didn't, at least,
understand, so I'm going to reask that question, and the
question that I had asked, I believe, was: Did you ever
receive any other request from the President in reference to
your dealings with Ms. Lawinsky other than the request to
find her a job in New York? And I think your answer was:
That's correct. And that confuses me a little bit, so let
me rephrase the question.

Did you ever receive--not rephrase it, but restate
the question. Did you ever receive any other request from
the President in reference to your dealings with Monica
Lewinsky other than the request to find her a job in New
York?

Q. Now, let me go to December 31, 1997, in reference
to another issue that Ms. Lewinsky has testified about in
her August grand jury appearance and in which you have not
had the opportunity to discuss in detail.

Ms. Lewinsky has testified that she met you for
breakfast at the Park Hyatt—

MR. HUNDLEY: Excuse me. I think you misspoke
yourself. You said '97.

MR. HUTCHINSON: This is '97, right?

MR. HUNDLEY: It is? I apologize.

MR. HUTCHINSON: Okay. Thank you, Mr. Hundley.

The years are confusing, but I believe this is December 31,
1997.

BY MR. HUTCHINSON:

Q. And Ms. Lewinsky has testified that she met you
for breakfast at the Park Hyatt, and even specifically as to
what she had for breakfast on that particular occasion when
she met with you and as to the conversation that she had.

And I want to show you, in order to hopefully
refresh your recollection, an exhibit which I'm going to
mark as the next exhibit number, which will be 6, I believe?
SENATOR THOMPSON: Yes. What--

MR. HUTCHINSON: And it's in the binder as Exhibit 42. It is not there, but it is in the binder as Exhibit 42.

SENATOR THOMPSON: Let's take a moment so everyone can refer to that.

BY MR. HUTCHINSON:

Q Have you located that, Mr. Jordan?

A [Nodding head up and down.]

Q And this receipt, is this a receipt for a charge that you had at the Park Hyatt on December 31st?

A That's an American Express receipt for breakfast.

Q And is the date December 31st?

A That is correct.

Q And does it reflect the items that were consumed at that breakfast?

A It reflects the items that were paid for at that breakfast.

[Laughter.]

BY MR. HUTCHINSON:

Q Does it appear to you that this is a breakfast for two people?

A The price suggests that it was a breakfast for two people.

Q All right. And the fact that there's two coffees, there is one omelet, one English muffin, one hot cereal, and
can you identify from that what you ordinarily eat at
breakfast?

A What I ordinarily eat at breakfast varies. This
morning, it was fish and grits.

Q All right. Now, Ms. Lewinsky in her testimony, I
think, referenced as to what she ate, which I believe would
be confirmed in this record.

Do you recall a meeting with Ms. Lewinsky at the
Park Hyatt on December 31st of--

A If you--

Q --1997?

A If you would refer to my testimony before the
grand jury when asked about a breakfast with Ms. Lewinsky on
December 31st, I testified that I did not have breakfast
with Ms. Lewinsky on December 31st because I did not
remember having had breakfast with Ms. Lewinsky on December
31st. It was not on my calendar. It was New Year's Eve. I
have breakfast at the Park Hyatt Hotel three or four times a
week if I am in town, and so I really did not remember
having breakfast with Ms. Lewinsky. And that's an honest
statement, I did not remember, and I told that to the grand
jury.

It is clear, based on the evidence here, that I
was at the Park Hyatt on December 31st. So I do not deny,
despite my testimony before the grand jury, that on December
That I was there with Ms. Lewinsky, but I did testify before the grand jury that I did not remember having a breakfast with her on that date, and that was the truth. My recollection has subsequently been refreshed, and so it is—it is undeniable that there was a breakfast in my usual breakfast place, in the corner at the Park Hyatt. I'm there all the time.

Q  All right. And so—and that would be with Ms. Lewinsky?

A  Yes.

Q  And so the—so your memory has been refreshed, and I appreciate the statement that you just made.

Let me go to that meeting with her and ask whether during this occasion that you met her for breakfast that there was a discussion about Ms. Linda Tripp and Ms. Lewinsky's relationship with her and conversations with her.

A  I also testified in my grand jury testimony that I never heard the name "Linda Tripp" until such time that I saw the Drudge Report. I did not have a conversation with Ms. Lewinsky at the breakfast at the Park Hyatt Hotel on December 31st about Linda Tripp. I never heard the name "Linda Tripp," knew nothing about Linda Tripp until I read the Drudge Report.

Q  All right. And do you recall a discussion with Ms. Lewinsky at the Park Hyatt on this occasion in which
there were notes discussed that she had written to the
President?

A  I am certain that Ms. Lewinsky talked to me about
notes.

Q  On this occasion?

A  Yes.

Q  And would these have been notes that she would
have sent to the President?

A  I think that there was--these notes had to do with
correspondence between Ms. Lewinsky and the President.

Q  And would she have mentioned the retention or
copies of some of that correspondence on her computer in her
apartment?

A  She may have done that.

Q  And did you ask her a question, were these notes
from the President do you?

A  I understood from our conversation that she and
the President had correspondence that went back and forth.

Q  And did you make a statement to her, "Go home and
make sure they're not there"?

A  Mr. Hutchinson, I'm a lawyer and I'm a loyal
friend, but I'm not a fool, and the notion that I would
suggest to anybody that they destroy anything just defies
anything that I know about myself. So the notion that I
said to her go home and destroy notes is ridiculous.
Q Well, I appreciate that reminder of ethical responsibilities. It was--
A No, it had nothing to do with ethics, as much as it's just good common sense, mother wit. You remember that in the South.
Q And so--and let me read a statement that she made to the grand jury on August 6th, 1998. This is the testimony of Ms. Lewinsky, referring to a conversation with you at the Park Hyatt that, "She," referring to Linda Tripp, "was my friend. I didn't really trust her. I used to trust her, but I didn't trust her anymore, and I was a little bit concerned because she had spent the night at my home a few times, and I thought--I told Mr. Jordan. I said, 'Well, maybe she's heard some'--you know, I mean, maybe she saw some notes lying around, and Mr. Jordan said, 'Notes from the President to you?,' and I said, 'No. Notes from me to the President,' and he said, 'Go home and make sure they're not there.'"
A And, Mr. Hutchinson, I'm saying to you that I never heard the name "Linda Tripp" until I read the Judge--Drudge Report.
Secondly, let me say to you that I, too, have read Ms. Lewinsky's testimony about that breakfast, and I can say to you, without fear of contradiction on my part, maybe on her part, that the notion that I told her to go home and
destroy notes is just out of the question.

Q    And so this is not a matter of you not recalling
whether that occurred or not--
A    I am telling you--
Q    Well, let me--
A    --emphatically--
Q    Mr. Jordan, let me finish the question.
A    Okay, all right.
Q    Please, sir.
A    Okay.
Q    It's sort of important for the record.
    This is a statement by Ms. Lewinsky that you
flatly and categorically deny?
A    Absolutely.
Q    Now, you talked about "mother wit," I think it
was; that you knew at the time that you had this discussion
with Ms. Lewinsky that these notes would have been covered
by the subpoenas based upon your discussion of that on
December 19th?
A    Ask that question again.
Q    All right. This is a meeting on December 31st at
the Park Hyatt.
A    Right.
Q    A discussion about the notes, correspondence
between Ms. Lewinsky and the President.
A Right.

Q You are aware, based upon your discussion of the subpoena on December 19th, that these were covered under the subpoena?

A Yes.

Q And did you tell Ms. Lewinsky that you need to make sure you tell your attorney, Mr. Carter, and that these are turned over under the subpoena?

A What I did not tell her was to destroy the notes. Whether I told her to give them to Mr. Carter or not, I have no recollection of that.

Q But you knew at the time that these notes were a matter of evidence?

A I think that's a valid assumption.

Q But you knew that?

A It's a valid assumption.

Q Now, during this meeting at the Park Hyatt, did Ms. Lewinsky also make it clear to you that she was in love with the President?

A That, I had already concluded.

Q And if Ms.--now, was there anything else at the Park Hyatt at this meeting on December 31st that you recall discussing with Ms. Lewinsky?

A Job, work, in New York, in the private sector.

Q And that was the--was this a meeting that was set
up at her request or your request?

A I'm certain it was at her request. I am fairly certain that I did not call Ms. Lewinsky and say will you join me at the Park Hyatt for breakfast on December 31st, on New Year's Eve.

Q All right. And did you also talk about her situation under the subpoena and the fact that she was going to have to give testimony, it looked like?

A I am not Ms. Lewinsky's lawyer, and I did not view it as my responsibility to give Ms. Lewinsky advice and counsel.

I had found her very able, competent counsel.

Q Respectfully, I am simply asking whether that was discussed.

A And I am simply saying to you, I did not provide her legal counsel.

Q Okay. Was it discussed in--not in terms of legal representation, but in terms of Mr. Jordan to Monica Lewinsky about any emotional concerns she might have about pending testimony?

A I have no recollection of talking to her about pending testimony.

Q Fair enough. Now, let's go back to Mr. Carter's representation of Ms. Lewinsky that you referred to. Were you aware that Mr. Carter was preparing an affidavit for Ms.
Lewinsky to sign in the Jones case?

A Yes.

Q And on or about the 6th or 7th of January, did you become aware that she in fact had signed the affidavit and that Mr. Carter had filed a motion to quash her subpoena in the case?

A She told me that she had signed the affidavit.

Q And did in fact Mr. Carter also relate to you that that had occurred?

A Yes.

Q And I think you made a statement in your March grand jury testimony that there was no reason for accountability, that he reassured me that he had things under control?

A That is correct. I stand by that testimony.

Q And now, if you would, look at the next exhibit, which is in that stapled bunch of exhibits that have been provided to you.

MR. HUTCHINSON: This will be Exhibit No. 7, we'll mark for your deposition.

And, Senator, did we put Exhibit No. 6 in?

SENATOR THOMPSON: No, we didn't.

MR. HUTCHINSON: I would like to offer that as an exhibit to this deposition.

SENATOR THOMPSON: It will be made a part of the
record.

[Jordan Deposition Exhibit Nos. 6 and 7 marked for identification.]

[Witness perusing document.]

SENATOR DODD: That is Number 6?

MR. HUTCHINSON: Six. That's the Park Hyatt.

SENATOR DODD: Oh, that is going to be Number 6, the Park Hyatt, not the--

MR. HUTCHINSON: Yes.

SENATOR THOMPSON: Now, what is 7?

MR. HUTCHINSON: Now, 7 is the affidavit of Jane Doe Number 6, which in the--I think everybody has found that in the book.

SENATOR THOMPSON: What is the grand jury number?

MR. HUTCHINSON: It's 85, the grand jury number.

This will be Deposition Exhibit Number 7.

BY MR. HUTCHINSON:

Q Now, Mr. Jordan, I think you're reviewing that affidavit bears the signature on the last page of Monica S. Lewinsky, is that correct?

A Yes.

Q And have you ever seen this signed affidavit before?

A I don't think so.
Q  Do you not recall that Ms. Lewinsky brought this
in and showed it to you?
A  She may have.
Q  And I'd be glad to refresh you. I know that some
of this--
A  Yeah, if it's in the testimony, Congressman.
Q  Page 192 of your previous grand jury testimony.
Is it your recollection that she showed this to you in a
meeting in your office after she had signed it?
A  I stand by that testimony.
Q  And so the date of that signature of Ms. Lewinsky,
is that January 7th?
Q  Right. Now, whenever she presented this
signed affidavit to you, did you read it sufficiently to
know that it stated that Ms. Lewinsky did not have a sexual
relationship with the President?
A  I was aware that that was in the affidavit.
Q  And I believe you previously testified that you're
a quick reader and you skimmed it and familiarized yourself
with it?
A  Skimmed it.
Q  And prior to seeing the signed affidavit that she
brought to you, the day after it was signed, was there a
time that Ms. Lewinsky called you concerning the affidavit
and said that she had some questions about the draft of the
affidavit?

A Yes. I do recollect her calling me and asking me
about the affidavit; and I said to her that she should talk
to the--talk to Frank Carter, her counsel, about the
affidavit and not to me.

Q And if I could go into, again, some areas that had
not been previously asked to you, and since Ms. Lewinsky
testified to the grand jury on August 6th.

Ms. Lewinsky has testified that she dropped a copy
of the affidavit to you, and that you--and that you and she
had a telephone conversation in which you discussed changes
to the affidavit. Does this refresh your recollection, and
do you agree with Ms. Lewinsky's recollection of a
discussion on changes in the affidavit?

A I do agree with the assumption--I mean, I do agree
with the statement that Ms. Lewinsky dropped the affidavit
off and called me up about the affidavit and was quite
verbose about it, and I sort of listened and said to her,
"You need to talk to Frank Carter."

She was not satisfied with that, and so she kept
talking and I kept doodling and listening as she went on in
sort of a, for lack of a better word, babble about
this--about this thing, but it was not my job to advise her
about an affidavit. I don't do affidavits.
Q Now, if I may show you, which would be Exhibit—

MR. HUTCHINSON: First, let me go ahead and offer

7.

SENATOR THOMPSON: It’s made a part of the record.

[Jordan Deposition Exhibit No.
7 received in evidence.]

MR. HUTCHINSON: It’s part of the record.

And then go to Exhibit 8, which was marked as

Exhibit 39 as your previous grand jury testimony.

[Jordan Deposition Exhibit No.
8 marked for identification.]

[Witness perusing document.]

BY MR. HUTCHINSON:

Q Now, Exhibit 8 is a summary of telephone calls on
January 6th, which would be the day before the affidavit was
signed by Ms. Lewinsky on the 7th.

Now, you may reflect on that for a moment, but in
reviewing these calls, it appears that Mr. Carter was paging
Ms. Lewinsky early on in the day, 11:32 a.m., and then at
3:26, you had a telephone call with Mr. Carter for 6 minutes
and 42 seconds.

And then there was—call number 6 was to Ms.

Lewinsky, which was obviously a 24-second short call, and
then a subsequent call for almost 6 minutes at 3:49 p.m. to
Ms. Lewinsky.
Was this last call for 5 minutes to Ms. Lewinsky
the call that you just referenced in which the draft
affidavit was discussed?
A  I think that is correct. The 24-second call, I
think, was voice mail.
Q  Was--was--pardon?
A  Voice mail.
Q  Certainly.
And subsequent to your conversation with Ms.
Lewinsky for 5 minutes and 54 seconds, did you have two
calls to Mr. Carter, which would be No. 9 and 10?
[Witness perusing document.]
THE WITNESS: Yes.
BY MR. HUTCHINSON:
Q  Do you know why you would have been calling Mr.
Carter on three occasions, the day before the affidavit was
signed?
A  Yeah. I--my recollection is--is that I was
exchanging or sharing with Mr. Carter what had gone on, what
she had asked me to do, what I refused to do, reaffirming to
him that he was the lawyer and I was not the lawyer. I
mean, it would be so presumptuous of me to try to advise
Frank Carter as to how to practice law.
Q  Would you have been relating to Mr. Carter your
conversations with Ms. Lewinsky?
A I may have.
Q And if Ms. Lewinsky expressed to you any concerns about the affidavit, would you have relayed those to Mr. Carter?
A Yes.
Q And if Mr. Carter was a good attorney that was concerned about the economics of law practice, he would have likely billed Ms. Lewinsky for some of those telephone calls?
A You have to talk to Mr. Carter about his billing.
Q It wouldn't surprise you if his billing did reflect a--a charge for a telephone conversation with Mr. Jordan?
A Keep in mind that Mr. Carter spent most of his time in being a legal services lawyer. I think his concentration is primarily on service, rather than billing.
Q But, again, based upon the conversations you had with him, which sounds like conversations of substance in reference to the affidavit, that it would be consistent with the practice of law if he charged for those conversations?
A That's a question you'd have to ask Mr. Carter.
Q They were conversations of substance with Mr. Carter concerning the affidavit?
A And they were likely conversations about more than Ms. Lewinsky.
Q  But the answer was yes, that they were conversations of substance in reference to the affidavit?
A  Or at least a portion of them.
Q  In other words, other things might have been discussed?
A  Yes.
Q  In your conversation with Ms. Lewinsky prior to the affidavit being signed, did you in fact talk to her about both the job and her concerns about parts of the affidavit?
A  I have never in any conversation with Ms. Lewinsky talked to her about the job, on one hand, or job being interrelated with the conversation about the affidavit. The affidavit was over here. The job was over here.
Q  But the--in the same conversations, both her interest in a job and her discussions about the affidavit were contained in the same conversation?
A  As I said to you before, Counselor, she was always interested in the job.
Q  \[\text{Jay}\]. And she was always interested in the job, and so, if she brought up the affidavit, very likely it was in the same conversation?
A  No doubt.
Q  And that would be consistent with your previous grand jury testimony when you expressed that you talked to
her both about the job and her concerns about parts of the affidavit?

A  That is correct.

Q  Now, on January 7th, the affidavit was signed.

Subsequent to this, did you notify anyone in the White House that the affidavit in the Jones case had been signed by Ms. Lewinsky?

A  Yeah. I'm certain I told Betty Currie, and I'm fairly certain that I told the President.

Q  And why did you tell Betty Currie?

A  I'm--I kept them informed about everybody else that was--everything else. There was no reason not to tell them about that she had signed the affidavit.

Q  And why did you tell the President?

A  The President was obviously interested in her job search. We had talked about the affidavit. He knew that she had a lawyer. It was in the due course of a conversation. I would say, "Mr. President, she signed the affidavit. She signed the affidavit."

Q  And what was his response when you informed him that she had signed the affidavit?

A  "Thank you very much."

Q  All right. And would you also have been giving him a report on the status of the job search at the same time?
A. He may have asked about that, and--and part of her problem was that, you know, she was--there was a great deal of anxiety about the job. She wanted the job. She was unemployed, and she wanted to work.

Q. Now, I think you indicated that he was obviously concerned about--was it her representation and the affidavit?

A. I told him that I had found counsel for her, and I told him that she had signed the affidavit.

Q. Okay. You indicated that he was concerned, obviously, about something. What was he obviously concerned about in your conversations with him?

A. Throughout, he had been concerned about her getting employment in New York, period.

Q. And he was also concerned about the affidavit?

A. I don't know that that was concern. I did tell him that the affidavit was signed. He knew that she had counsel, and he knew that I had arranged the counsel.

Q. Do you know whether or not the President of the United States ever talked to her counsel, Mr. Carter?

A. I have--I have no knowledge of that.

Q. Did you ever relate to Mr. Carter that you were having discussions with the President concerning his representation of Ms. Lewinsky and whether she had signed the affidavit?
A: I don't know whether I told him that she had--he
had--I don't know whether I told Mr. Carter that I told the
President he had signed the affidavit. It is--it is not
beyond reasonableness.
Q: Now let's go on. After the affidavit was signed,
were you ultimately successful in obtaining Ms. Lewinsky a
job?
A: Yes.
Q: And in fact, the day after Ms. Lewinsky signed the
affidavit, you placed a personal call to Mr. Ron Perelman of
Revlon, encouraging him to take a second look at Ms.
Lewinsky?
A: That is correct, based on the fact that Ms.
Lewinsky thought that her interview had not gone well, when
in fact it had gone well.
Q: And in fact, Ms. Lewinsky had called you on
a couple of occasions after the interview and finally got a
hold of you and told you she thought the interview went
poorly?
A: That's correct.
Q: And as a response to that information, you did not
call Mr. Halperin back, who you had previously talked to
about the issue, but you called Mr. Perelman?
A: That's right.
Q: Was there a reason that you called Mr. Perelman in
contrast to Mr. Halperin?

A  Well, the same reason I would have called you
about a committee if you were chairman of it, as opposed to
calling to a member of the committee.

Q  All right. You wanted to go to the top?

A  When it's necessary.

Q  And I remember a phrase you used. I might not
have it exactly right, but you don't get any richer or more
powerful than Mr. Perelman?

A  Certainly not much richer.

Q  Okay. And--and so you had a conversation with Mr.
Perelman, and did you tell him something like, make it
happen if it can happen?

A  I said, "This young lady"--I mean, I think I said,
"This young lady has been interviewed. She thinks it did
not go well. Would you look into it?"

Q  And what was his response?

A  That he would look into it.

Q  Now I'd like to show you the next exhibit, and
before I do that, I would go back and offer Number 7.

SENATOR THOMPSON: Seven is the last.

This would be Number 8 that you--that you have
been discussing. The compilation of the telephone call
record?

MR. HUTCHINSON: Yes..
MR. KENDALL: I object. Same ground as before.

It's not best evidence. We don't know who compiled these.

These are not primary records.

SENATOR THOMPSON: Mr. Jordan has verified several

of these items, but I do notice there are some items here

that do not have to do with Mr. Jordan, that we could not

expect him to be able to verify.

So I would ask counsel, if he needs to identify

any more of these conversations and use this to reflect Mr.

Jordan's memory, he's free to do so, but as an exhibit, I

think the objection is probably well taken.

MR. HUTCHINSON: Let me just state, Senator, that

this is a compilation of calls based upon the records that

have been in the Senate record, and this has been--this

compilation has been in there some time.

Now, I, quite frankly, understand the objection,

and it might have meritorious if this was being introduced

into evidence in the actual trial, and so I would suggest

perhaps, since he's identified most of the calls already,

that this could be referenced as a deposition exhibit

because he's referred to it and that's helpful,

without--obviously, there might in a more--it might not be

entered into evidence as such.

SENATOR THOMPSON: Could I ask you if it's been in

the record as a compilation?
MR. HUTCHINSON: Yes, it has.

SENIOR THOMPSON: In this form? I notice that it has a grand jury--

MR. HUTCHINSON: It's--Senator, it's Volume III of the Senate record, page 161, and so it's all in there, anyway.

SENIOR THOMPSON: I notice in the record here, counsel is informing me that it is in the record, but there are several redactions. Is that correct?

MR. HUTCHINSON: That is correct, and for that reason--in fact, a number of these summaries are not redacted in our form and they're redacted in the record, and we'd like to have the opportunity to redact it in the form of taking out the personal telephone numbers.

MR. KENDALL: Senator Thompson, if I may be heard, my objection is--to this is a summary. We don't know who did it. We don't know what it's based on.

The witness has testified, and his testimony is in the record, so far as his recollection is refreshed.

I have no objection to original phone records, but I do object to the summary.

SENIOR THOMPSON: Counsel, could I suggest that maybe you just make a reference specifically to where it is in the existing record? I think it would serve your same purpose and to keep you from having--
MR. HUTCHINSON: Sure.

SENATOR THOMPSON: --to go through and redact everything. Would that be satisfactory?

MR. HUTCHINSON: I think that would be satisfactory, and what I can do is that I can withdraw this exhibit and reference in the transcript of this deposition that the exhibit is found in Table 35 of Senate record, Volume III, at page 161.

SENATOR DODD: Let me just ask the House Manager, if I can as well. Are these from the Senate record? I'm told that some of these are not from the Senate record, and we're kind of confined to the Senate record, as I understand it.

MR. HUTCHINSON: Well, other than the redactions, this summary itself is in the Senate record.

SENATOR THOMPSON: Yes.

Counsel informs me, it's already in. It refers to evidentiary record Volume IV.

MS. BOGART: Is it IV or III?

SENATOR THOMPSON: It says IV here, Part 2 of--Part 2 of 3.

So, for the record, this would be pages 1884 and 1885 of the evidentiary record, Volume IV, Part 2 of 3, all right?

MR. HUTCHINSON: Thank you.
SENATOR THOMPSON: All right. So the record will
be--the objection will be sustained, and reference has been
made.

SENATOR DODD: And can we just--because I presume
you may have more of these coming along, and it seems to me
you might want to have staff or others begin to work so we
don't go through this every time, particularly with the
unredacted material that may be included in here, which is
not part of the Senate record.

The unredacted information comes out of the House
record, as I understand, and that is a distinction.

MR. HENDLEY: I would just add that Mr.
Jordan--the last 3 days of his grand jury testimony, they
asked him about every phone call, and if you want to use
those, you know, go to his grand jury testimony, you know, I
think it would move things along.

There isn't a phone call. We produced like a
telephone book of phone calls that Mr. Jordan made, and they
called them all out, after they got through asking about
who's that, who's that and who's that--you've got a pretty
good record of calls that might have some relevance in this.

SENATOR THOMPSON: All right, sir. All right.

SENATOR DODD: Let me also just suggest on the
earlier--Senator Thompson, in the earlier objection raised
by Counsel Kendall, sustained the objection, but had made
reference to the fact that since this material had been
brought into the record that those--if any documentation is
included there, that we--we do use the Senate documents with
the redacted information, rather than the House records for
the purposes of this deposition.

SENATOR THOMPSON: All right, sir.

MR. HUTCHINSON: Thank you.

SENATOR THOMPSON: Proceed.

BY MR. HUTCHINSON:

Q And I will handle it this way, Mr. Jordan, and let
me say that I was sort of constructing my questioning, so as
not to get bogged down in an extraordinary number of
telephone calls, but let me go to the chart in front of you
which is Grand Jury Exhibit 44, which is marked for our
purposes as Exhibit 9 for identification purposes.

[Jordan Deposition Exhibit No.
9 marked for identification.]

[Witness perusing document.]

BY MR. HUTCHINSON:

Q And I'm going to--I'd like for you to refer
that--refer you to that for purposes of putting this
particular day, January 8th, in context and asking you some
questions about some of those telephone calls.

SENATOR THOMPSON: I'm sorry. What was the
question? Are you making reference for identification
purposes?

MR. HUTCHINSON: Yes. This is Exhibit 9, which is Grand Jury Exhibit 44.

SENATOR THOMPSON: All right, for identification purposes.

MR. HUTCHINSON: Yes.

SENATOR THOMPSON: All right.

BY MR. HUTCHINSON:

Q Now, this is the day, January 8th, which is the day that Ms. Lewinsky felt like she had a poor job interview. Does this reflect calls from the Peter Strauss residence to your office?

A I see a call number 3, 11:50 a.m., Peter Strauss residence. The number is here to my office.

Q All right.

A And it says length of call, one minute.

Q All right. And, in fact, calls 3, 4 and 5 and 9 are calls from the Peter Strauss residence to your office?

A That is correct.

Q And Peter Strauss is the residence in which Ms. Lewinsky was staying while in New York?

A I just know that Peter Strauss, my old friend, is Monica Lewinsky’s stepfather.

MR. HUNDLEY: But he wasn’t there.

THE WITNESS: You know, where she was and all of
that, I don't know. I'm just--

BY MR. HUTCHINSON:

Q You received calls from Ms. Lewinsky on this particular day?
A From this number, according to this piece of paper.

Q And does this time reference coincide with your recollection as to when you received calls from Ms. Lewinsky on this particular day?
A Yes.

Q And during these calls is when she related the difficulty of the job interview; is that correct?
A I believe so--that it had not gone well.

Q All right. And then, subsequently, you put in a call to Mr. Perelman at Revlon?
A Yes.

Q And that was to encourage him to take a second look. Is that call number 6 on this summary?
A Call number 6; it lasted one minute and 42 seconds.

Q And is that the call that you placed to Mr. Perelman?
A I believe that is correct.

Q And this was subsequent to the calls that you received from Ms. Lewinsky?
A  That is correct.

Q  And then you let Ms. Lewinsky know that you had called Mr. Perelman; and do you recall what you would have told her at that time?

A  I think I told her that I had spoken with, uh--with, uh, Mr. Perelman, the chairman, and that I was hopeful that things would work out.

Q  All right. And, in fact, they did work out because the next day you were informed that a temporary job--or a preliminary job offer had been made to Ms. Lewinsky?

A  That's right.

Q  So she was able to secure the job based upon your call to Mr. Perelman?

A  Based upon my call, from the time that I called Halperin through to Mr. Perelman.

Q  All right.

A  I take credit for that.

Q  All right. Now, in fact, you've used terms like "the Jordan magic worked"?

A  It--it has from time to time.

Q  And it did on this occasion?

A  I believe so.

Q  And then, you also informed Ms. Betty Currie that the mission was accomplished?

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 than 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, necessary completed. There is — as you know from your own
experience in helping young people with work, there tends to be some sense of responsibility to follow through, that they get to work on time, that they work hard, and that they succeed. So I don't think that I felt that my responsibility had terminated. I felt like I had a continuing responsibility to just make sure that it happened and that she--that it worked out all right. But I don't think I acted on that responsibility.

Q Well, this is--the job was completed--I believe it was January 8th when she secured the job?

A That was the day that I called Ronald Perelman.

Q Okay, so it would have been the 9th that she would have been informed that she had the job.

A That's right.

Q So this is the 9th of January, and that mission had been accomplished. Now, I want you to recall your testimony of May 28th before the grand jury in which the question was asked to you--and this is at page 81; the question begins at the bottom of page 80.

Question: "When you introduced Monica Lewinsky to Frank Carter on December 22, 1997, what further involvement did you expect to have with Monica Lewinsky and Frank Carter?"

Answer: "Beyond getting her the job, I thought it was finished, done"--and what's that last word you used?
"Finishing..."

Q. "Finishing..." 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
helping Ms. Lewinsky secure a job, this was widely know at
the White House, is that correct?

A I--I don't know the extent to which it was widely
known. I dealt with Ms. Currie and with the President.

Q In fact, Ms. Cheryl Mills, sitting here at counsel
table, knew that you were helping Ms. Lewinsky?

A I believe that's true.

Q And Betty Currie knew that you were helping Ms.
Lewinsky?

A Yes.

Q The President knew it?

A Yes.

Q And you presumed that Bruce Lindsey knew it?

A I presumed that. That's a very small number,
given the number of people who work at the White House.

Q Now, after that December 19 meeting--and I'm
backtracking a little bit--the meeting that you had with Ms.
Lewinsky in which she covered with you the fact that she had
been subpoenaed, after that, you had numerous conversations
with Ms. Betty Currie; is that correct?

A I'm not sure I had numerous conversations with Ms.
Betty Currie, but I have always during this administration
been in touch with Ms. Currie.

Q And during those conversations with Ms. Betty
Currie, did you let her know that Ms. Lewinsky had been
I think I've testified to that.

All right, and so would that have been fairly shortly after the meeting on December 19th with Ms. Lewinsky that you notified Betty Currie that Ms. Lewinsky had in fact been subpoenaed?

I--I think that's safe to say, Counselor.

Senator, I--this would be a good time for a break, if that would meet with your approval, for lunch.

All right, sir.

And I'm--it's hard to estimate, and you probably don't trust lawyers when they tell you how long it's going to take after lunch, but--

Try your best. Do you want to make an estimate, or you'd rather not?

Oh, I think it would be less than an hour that I would have remaining, and most likely much shorter than that.

All right, sir.

May I make a suggestion? It's 25 minutes to 1. Do you want to go to 1 o'clock?

I think a break would be helpful.

To you or to me?

[Laughter.]
SENATOR THOMPSON: I think some of us have some scheduling issues, and I do understand that, so I'm open to any suggestions, Senator Dodd or anyone else, as to how long we want to take. Yesterday, they took an hour. I'm not—we have a conference and I could use a little extra time, I suppose, in addition to the hour, but it's not of major concern to me.

I assume you want to get back as soon as possible.

THE WITNESS: I'm prepared to forgo lunch and stay here as long as need be so we can finish. And we don't have to have lunch; we can just keep going, if it's all right with counsel.

SENATOR THOMPSON: Well, we've got some scheduling issues that we are going to have to take care of. So let's just make it—let's just make it—

SENATOR DODD: That clock is a little fast, I think.

SENATOR THOMPSON: Is it?

SENATOR DODD: Is that right? It's about 12:30?

THE VIDEOGRAPHER: It's 12:35.

SENATOR DODD: So an hour and 15 minutes. Is that—

SENATOR THOMPSON: What about—what about—let's come back at 1:45. That will be about, what—-that's an hour and 10 minutes, isn't it, or 8 minutes, something like that?
All right. Without objection, then--

SERGEANT-AT-ARMS: Senator, we have lunch outside here. It's sandwiches--

SENATOR DODD: Can we go off the record?

SENATOR THOMPSON: Are we off the record? Let's go off the record.

THE VIDEOGRAPHER: We're going off the record now at 12:33 p.m.

[Whereupon, at 12:33 p.m., a luncheon recess was taken.]
AFTERNOON SESSION

[1:49 p.m.]

THE VIDEOGRAPHER: We are going back on the record at 1:49 hours.

SENATOR THOMPSON: All right. Mr. Hutchinson?

MR. HUTCHINSON: Thank you, Senators.

DIRECT EXAMINATION BY HOUSE MANAGERS - Resumed

BY MR. HUTCHINSON:

Q Mr. Jordan, good afternoon.

A Good afternoon.

Q You testified very clearly earlier today that you were a close friend of the President. Would you also describe yourself as a friend of Mr. Kendall, sitting to my left, one of the attorneys for the President?

A Not only is Mr. Kendall my friend, Mr. Kendall has, unfortunately, the distinction of graduating from Wabash College, a little, small town in Indiana, and I'm a graduate of DePauw University, and we have a 100-year rivalry. And Mr. Kendall and I bet.

Mr. Hutchinson, I am pleased to tell you that Mr. Kendall is in debt to me for 2 years because DePauw--

MR. KENDALL: May I object?

[Laughter.]  

THE WITNESS: --because DePauw University has defeated Wabash College two times in succession. And so,
yes, we are very good friends. I have great respect for him as a person, as a lawyer, and despite his undergraduate degree from Wabash, I respect his intellect.

BY MR. HUTCHINSON:

Q  May I assume from that answer that the answer to my question is yes?
A  The answer--the answer to your question is, indubitably, yes.
Q  Now I am going to ask another question in similar vein. You can answer yes or no. Do you consider yourself a friend of Cheryl Mills?
A  That requires more than just a "yes" answer.
Q  I do not want to shortchange her, but I know that--in fact, I think you might have, to a certain extent, mentored her. Is that a fair description?
A  And vice versa.
Q  All right. And Bruce Lindsey, is he also a friend of yours?
A  Yes.
Q  Now--so when was the last time that you met with any member of the President's defense team?
A  I have not had a meeting with a member of the President's defense team. They were right nextdoor to me just a few minutes ago, and we said hello, but we have not had a meeting. And maybe if you'd tell me about what, I can
be more specific.

Q Well--and that's a good point. Certainly, we're lawyers, and we have casual conversations, and we visit and we exchange pleasantries, and that's the way life should be.

A I guess I was more specifically going to the question as to whether you have discussed with the President's defense team any matter of substance relating to the present proceedings in the United States Senate.

Q Any matter of substance relating to these proceedings here in the United States Senate have been handled very ably by my lawyer, Mr. William Hundley.

A And I understand that, but my question is--despite your able representation by Mr. Hundley--my question is--is whether you had any meetings or discussions with the President's defense team in regard to these proceedings.

Q The answer is no.

A Thank you.

Q And has anyone briefed you other than your attorney, Mr. Hundley, on yesterday's deposition of Ms. Lewinsky?

A The answer is no.

Q Now, you know Greg Craig?

A I do know Greg Craig.

Q And he's a member of the President's defense team as well?
A Yes.
Q And you have not had any meetings of substance with him in regard to the present proceedings?
A I have not.
Q And have you had any meetings with any of the President’s defense team in regard to not just the present proceedings, but prior proceedings related to your testimony before the grand jury or the investigation by the OIC?
A I have had conversations with the President’s lawyer, Mr. Bennett, and a conversation or two with Mr. Kendall on the issue of settlement of the Paula Jones case, and I believe I testified to that before the grand jury.
Q All right. Thank you, Mr. Jordan, and now let me move to another area.

Do you recall an occasion in which Ms. Betty Currie came to see you in your office a few days before the President’s deposition in the Jones case on January 17th?
A Yes, I do.
Q And I believe you have previously indicated that it was on a Thursday or Friday, which would have been around the 15th or 16th?
A Yeah. I’ve testified to that specifically as to the date in my grand jury testimony, and I stand on that testimony.
Q Certainly. But in general fashion, it would have
been a couple of days before the President's testimony on January 17th?

A I believe that is correct, sir.

Q And did--was this meeting with Betty Currie originated by a telephone call with Ms. Betty Currie?

A Ms. Currie called me.

Q And did she explain to you why she needed to see you?

A Yes, she did.

Q And was that that she had a call from Michael Isikoff of Newsweek magazine?

A That is correct.

Q And what did she say about that that caused her to call you?

A She had said that Mr. Isikoff had called her and wanted to interview her, having something to do with Monica Lewinsky, and I said to her, why don't you come to see me.

Q And why did you ask her to come see you, rather than just talking to her about it over the telephone?

A I felt more comfortable doing that, and I think she felt comfortable or more comfortable doing that, rather than doing it on the telephone. And so I asked her to come to my office, and she did.

Q Did you consider--or did she seem upset at the time that she called?
A I think she was concerned.
Q And as--you did in fact meet with her in your office?
A I did.
Q And what did she relate to you in your office?
A That Michael Isikoff was a friend of hers, and that Michael Isikoff had called to--pursuant to a story that he was about to write having to do with Ms. Lewinsky, and she--she was concerned about what to do. And I suggested to her that she talk to Bruce Lindsey and to Mike McCurry as to what she should do, Bruce Lindsey on the legal side and Mike McCurry on the communications side.
Q Did she explain to you what it was specifically that Mr. Isikoff was inquiring about in reference to Ms. Lewinsky?
A No. I don't remember the exact nature of Isikoff's inquiry. What I do remember is that Isikoff, a Newsweek magazine reporter, had called and was making these inquiries, and she was at a loss as to where to turn or to what to do, and I think that stemmed from the fact of some White House policy saying that before you talk to anybody in the media, you check it out.
Q And did she explain to you that she had already seen Bruce Lindsey about it before she came to see you?
A She did not.
Q And so you were basically telling her to see Bruce Lindsey, and if she had already seen that, then that might have not been that helpful?
A I don’t know whether I was being helpful or not. I responded to her, and I gave her the advice to call Bruce Lindsey and to call Mike McCurry.
Q Let me refer you to the testimony of Ms. Betty Currie, and perhaps that will help refresh you, and if not, perhaps you can respond to it.
A Sure.
Q And for reference purposes, I’m referring to the grand jury testimony of Ms. Betty Currie on May 6th, 1998, at page 122.

MR. HUTCHINSON: Is there a way --
MR. HUNDLEY: We don’t have that. If you want to--if you want us to read along or just--
THE WITNESS: Wait a minute. I might have it right here. What page?
MR. HUTCHINSON: What’s the exhibit number?
MR. HUNDLEY: How long is it, Mr. Hutchinson?
MR. HUTCHINSON: This would just be some short question-and-answers.
MR. HUNDLEY: Why don’t you just read it? We don’t--go ahead.
THE WITNESS: Oh, fine.
BY MR. HUTCHINSON:

Q. I'm going to read it, and if there's--it's at page 122, but this just puts it in context.

The question: "Ms. Currie, if I'm not mistaken, if I could ask you a couple of questions. When you found out Mr. Isikoff was curious about the courier receipts, you were concerned enough to go visit Vernon Jordan?"

The answer is: "Correct."

And I'm skipping on down. I'm trying to point to a couple of things that are of interest.

And question: "And you went to Bruce Lindsey because you said you knew that he was working on the matter?"

And question: "What did Bruce tell you after you told him this?"

And answer: "He told me not to call him back, referring to Mr. Isikoff, make him work for the story. I remember that."

And then she refers to going to see Mr. Jordan. Why did you tell him, or, "Why did you call Mr. Jordan?"

Answer: "Because I had a comfort level with Vernon, and I wanted to see what he had to say about it."

MR. KENDALL: Counsel, excuse me. I object to your reading of that, but my understanding that the
conversational with Bruce Lindsey occurred later. Are you representing that it occurred before the visit to Mr. Jordan? I don't have the transcript in front of me.

MR. HUTCHINSON: Well, I'm--I'm not making a representation one way or the other. I'm just representing what Ms. Currie testified to, and that is the context of it, that the visit to Mr. Lindsey was prior to going to see Mr. Jordan. And that is at page 122 through 130 of Betty Currie's transcript of May 6th, 1998.

BY MR. HUTCHINSON:

Q  But the first question, Mr. Jordan, is that she refers to courier receipts. I believe that was referring to courier records of gifts from Ms. Lewinsky to the President.

Did Ms. Currie come to you and say specifically that Mr. Isikoff was inquiring about courier records on gifts from Ms. Lewinsky to the President?

A  I have no recollection of her telling me about the specific inquiry that Isikoff was making. The issue for her was whether or not she should see him, and I said to her, before she made any decision about that, that she should talk to these two particular people on the White House staff.

Q  Well, again, if Ms. Currie refers to the courier receipts on gifts, would that be in conflict in any way with your recollection as to what Mr. Isikoff was inquiring
about, what Ms. Currie told you?

A I stand on what I've just said to you.

Q Now, you followed this case, and, of course--

SENATOR THOMPSON: While we're on that subject,

does counsel need any additional time to look over that? I
don't want to leave an objection on the record. If you feel
like you need to press it--

SENATOR DODD: Do you have a copy of the document?

MR. KENDALL: Senator Thompson, we don't have the
full copy of the Currie transcript. This was not--

SENATOR THOMPSON: Why don't we reserve this,
then, and you can be looking at it, and then we'll--we'll
take it up a little later.

MR. KENDALL: We're still actually missing some
pages of the transcript. I don't know if somebody has that.

SENATOR DODD: Why don't you see if you can't get
them for them?

SENATOR THOMPSON: Okay.

SENATOR DODD: All right?

SENATOR THOMPSON: We'll let them be doing that,
if that's okay with everyone and--

SENATOR DODD: And you'll withdraw your objection
as of right now, or--

MR. KENDALL: Yes. I'll withdraw it until I can
scrutinize the pages, but I may then renew it.
SENATOR THOMPSON: All right, sir.

BY MR. HUTCHINSON:

Q On--there's been some testimony in this case by Ms. Lewinsky that on December 28th, there was a gift exchange with the President; that subsequent to that, Ms. Currie went out and picked up gifts from Ms. Lewinsky, and she put those gifts under Ms. Currie's bed. Are you familiar with that basic scenario?

A I read about it and heard about it. I do not know that because that was told to me by Ms. Lewinsky or by Ms. Currie.

Q Certainly, and I'm just setting that forth as a backdrop for my questioning.

Now, you know, I guess it's--it might be difficult to understand a great deal of concern about a news media call, but if that news media call was about gifts or evidence that was in fact under Ms. Currie's bed or involved in that exchange, then that would be a little heightened concern.

A Yes.

Q Would that seem fair?

A I do not, as I've said to you, know specifically the nature of Mr. Isikoff's inquiry to Ms. Currie, and I know nothing at that particular time about Mr. Isikoff making an inquiry about gifts under the bed.
Q. All right. I refer you to your grand jury testimony of March 5, 1998, at page 73, when the question was asked of you about Ms. Currie's visit to you, "What exactly did she tell you?" and your answer: "She told me that she had a call from Isikoff from Newsweek magazine, who was calling to make inquiries about Monica Lewinsky and some taped conversations, and I said you have to talk to McCurry and you have to talk to Bruce Lindsey."

And so, despite your statement today that you have no recollection as to what she told you, going back to your March testimony, you referred to her relating Isikoff inquiring about taped conversations.

A. That's what it says, "taped conversations," and I stand by that.

Q. What was taped, I don't know.

MR. HUNLEY: Well, I don't really think your question would have called for that response, but I'm not going to object.

MR. HUTCHINSON: Thank you, Mr. Hundley.

BY MR. HUTCHINSON:

Q. I'm trying to get to the heart of the matter. Ms. Currie is concerned enough that she leaves the White House and goes to see Mr. Vernon Jordan, and she raises an issue.
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 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
States testified before the grand jury in the--excuse me--testified in his deposition in the Jones case. After the President’s deposition, did he have a conversation with you on that day?

A Yes. I’m sure we talked.

Q And then, on the next day, and without getting into the entire record of telephone calls, there was, is it fair to say, a flurry of telephone calls in which everyone was trying to locate Ms. Monica Lewinsky?

A The next day being which day?

Q The next day would have been--well, January 18th.

A That’s Sunday.

Q Correct.

MR. HUNDLEY: I think it’s the 19th.

THE WITNESS: I think it’s the 19th when there was a flurry of calls.

MR. HUTCHINSON: I think you’re absolutely correct.

THE WITNESS: We’ll be glad to be helpful to you in any way we can.

MR. HUNDLEY: We’re even now. I was wrong on one.

You were wrong.

MR. HUTCHINSON: That’s fair enough, fair enough.

BY MR. HUTCHINSON:

Q And on the 19th--of course, the 18th is in the
record where the President visited with Ms. Betty Currie at
the White House--on the 19th, which would have been Monday,
was there on that day a flurry of activity in which there
were numerous telephone calls, trying to locate Monica
Lewinsky?

A  Yes. And you have a record of those telephone
calls, and those telephone calls, Congressman, were driven
by two events--first, the Drudge Report; and later in the
afternoon, driven by the fact that, uh, I had been informed
by Frank Carter, counsel to Ms. Lewinsky, that he had been
relieved of his responsibilities as her counsel. And that
is the basis for these numerous telephone calls.

Q  And you yourself were engaged in some of those
telephone calls trying to locate Ms. Lewinsky?

A  Oh, yes, to ask her--I mean, I had just found out
that she had been involved in these conversations with this
person called Linda Tripp, and that was of some curiosity
and concern to me.

Q  And you had heard Ms. Tripp's name previously on
December 31st at the Park Hyatt?

A  I've testified already that I never heard the name
"Linda Tripp" until I saw the Drudge Report. I did not
testify that I heard the name "Linda Tripp" on December
31st.

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 19th, I believe it was.

MR. HUNDELEY: 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 a lawyer.

Q And a lawyer. And, as you had said at one point, job finished--fini. 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?
A I was not trying to help the President of the United States. At that point, I was trying to satisfy myself as to what had gone on with this person for whom I had gotten both a job and a lawyer.

Q Now, subsequent to this, you felt it necessary to make a public statement on January 22 in front of the Park Hyatt Hotel?

A I did make a public statement on January 22nd at the Park Hyatt Hotel.

Q And what was the reason that you gave this public statement?

A I gave the public statement because I was being rebuked and scorned and talked about, sure as you're born, and I felt some need to explain to the public what had happened.

MR. HUTCHINSON: All right. And I have a copy of that public statement that is marked as Grand Jury Exhibit 87, but we will mark it as Exhibit—

SENATOR THOMPSON: Seven, I believe.

SENATOR DODD: We've gone through 9, haven't we?

You're marking it. If you're only marking it, I think we—

SENATOR THOMPSON: We have six exhibits, didn't we?

SENATOR DODD: We've done more than that, haven't we?
MR. HUTCHINSON: I have nine.

SENATOR DODD: Mine. Did you enter 9, or did you just note it?

SENATOR THOMPSON: Six were entered, two were sustained, I think.

MS. MILLS: I have seven.

SENATOR DODD: Nine, you have here, but we didn’t—I don’t know if you—you don’t have 9 as an exhibit, or just noted?

MR. GRIFFITH: Nine was Grand Jury 44.

MR. HUTCHINSON: We just noted it, I believe.

SENATOR DODD: You didn’t ask that it be entered in the record?

MR. HUTCHINSON: I believe that’s correct.

SENATOR DODD: Yes.

SENATOR THOMPSON: How about those we sustained objections to? That doesn’t count.

SENATOR DODD: Well, they’re still marked.

SENATOR THOMPSON: They were marked?

SENATOR DODD: So which one should this be? Ten?

SENATOR THOMPSON: This will be 10?

SENATOR DODD: This is 10, then.

MR. HUTCHINSON: All right, Number 10.

[Jordan Deposition Exhibit No. 10 marked for identification.]
BY MR. HUTCHINSON:

Q. Do you have a copy of that, Mr. Jordan?
A. I have a copy of it. Thank you.

Q. Thank you. Now, prior to making this public statement, did you consult with the President’s attorney, Mr. Bob Bennett?
A. I did not, not about this statement.

Q. Did you consult with the President’s attorney, Mr. Bob Bennett?
A. I did not consult with him. Mr. Bennett came to my office and met with me and my attorney, Mr. Hundley, in my office.

Q. All right. And that was sometime prior to making this statement?
A. That is correct.

Q. And it would be--and it would have been between the 19th and the 22nd?
A. That is correct.

Q. It would have been after all of the public issues--
A. It was after--

Q. --came up?
A. --I returned from Washington, and it may have been--from New York--and it may have been, I think, Wednesday afternoon.
Q Now, in this statement, you indicated that you
referred Ms. Lewinsky for interviews at American Express and
at Revlon.

A That is correct, and Young & Rubicam.

Q And in fact, as your testimony today indicates,
you did more than refer her for interviews, did you not?

A Explain what you mean, and I'll be happy to
answer.

Q Well, in fact, when the interview went poorly,
according to Ms. Lewinsky, you made calls to get her a
second interview and to make it happen.

A That is safe to say.

Q All right. And I think you've also described your
involvement in the job search as running the job search?

A Yes.

Q And so it was a little bit more than simply
referring her for interviews. Is that a fair statement?

A That's a fair statement.

Q And then, in this statement, you also indicate
that "Ms. Lewinsky was referred to me by Ms. Betty Currie"--

A Yes.

Q --is that correct?

A That is correct.

Q And in fact, you were acting, as you stated, at
the behest of the President?
A Through Ms. Currie. I'm satisfied with this statement as correct.

Q So--but you were acting in the job search at the behest of the President, as you have previously testified?

A I've testified to that.

MR. HUTCHINSON: Now, we would offer this as Exhibit No. 10.

SENATOR THOMPSON: Without objection, it will be made a part of the record.

[Jordan Deposition Exhibit No. 10 received in evidence.]

MR. HUNDELEY: The only problem with this line of questioning is I think I wrote that thing.

[Laughter.]

BY MR. HUTCHINSON:

Q After you--after you last testified before the grand jury in June of '98, since then, the President testified before the grand jury in August, and prior to his testimony before the grand jury in August, he made his statement to the Nation in which he--I believe the language was admitted to "an inappropriate relationship with Ms. Lewinsky."

Now, at the time that you testified in June of '98, you did not have this information, did you?

A He had not made that statement on the 17th of
August, that's for sure.

Q And was he in fact, to your knowledge, still denying the existence of that relationship?

A I think, as I remember the statement, he said he misled the American people.

Q And subsequent to this admission, did you talk to your friend, the President of the United States, about his false statements to you?

A I have not spoken to him about any false statements, one way or the other.

Q Now, you have testified that you in the job search were acting at the behest of the President of the United States; is that correct?

A I stand on that.

Q And there is no question but that Ms. Monica Lewinsky understood that?

A I have to assume that she understood that.

Q And in the law, there is the rule of agency and apparent authority. Is it safe to assume that Ms. Lewinsky believed that you had apparent authority on behalf of the President of the United States?

A I think I know enough about the law to say that the law of agency is not applicable in this situation where there was a potential romance and not a work situation. I think the law of agency has to do with a work situation and
an employment situation and not having to do with some sort
of romance. I think that’s right.
Q   Well, let me take it out of the legal realm.
A   You raised it—I didn’t.
Q   And let’s put it in the realm of mother wit. Ms.

Lewinsky is looking to you as a friend of the President of
the United States, knowing that you’re acting at the behest
of the President of the United States. Is it not reasonable
to assume that when she communicates something to you or she
hears something from you, that it’s as if she is talking to
someone who is acting for the President?
A   No. When she’s talking to me, she’s talking to
me, and I can only speak for me and act for me.

MR. HUTCHINSON: Could I have just a moment?

SENATOR THOMPSON: Yes.

MR. HUTCHINSON: At this time, Your Honors, the
House Managers would reserve the balance of its time.

SENATOR THOMPSON: Counsel?

MR. HUNDELEY: Fine.

SENATOR THOMPSON: All right.

MR. HUTCHINSON: Thank you, Mr. Jordan.

THE WITNESS: Thank you, Mr. Hutchinson.

SENATOR THOMPSON: Mr. Kendall?

EXAMINATION BY COUNSEL FOR THE PRESIDENT

BY MR. KENDALL
Q Mr. Jordan, is there anything you think it appropriate to add to the record?

A Mr. Hutchinson, I'd just like to--

MR. HUTCHINSON: I'm going to object to the form of that question. I think that even though--and that's not even a leading question; that's an open-ended question that calls for a narrative response. And I think in fairness to the record that that is just simply too broad for this deposition purpose.

SENATOR THOMPSON: Mr. Kendall, is there any chance of perhaps your rephrasing the question somewhat?

MR. KENDALL: Certainly.

BY MR. KENDALL:

Q Mr. Jordan, you were asked questions about job assistance. Would you describe the job assistance you have over your career given to people who have come to you requesting help finding a job or finding employment?

A Well, I've known about job assistance and have for a very long time. I learned about it dramatically when I finished at Howard University Law School, 1960, to return home to Atlanta, Georgia to look for work. In the process of my--during my senior year, it was very clear to me that no law firm in Atlanta would hire me. It was very clear to me that, uh, I could not get a job as a black lawyer in the city government, the county government, the State government
or the Federal Government.

And thanks to my high school bandmaster, Mr. Kenneth Days, who called his fraternity brother, Donald L. Hollowell, a civil rights lawyer, and said, "That Jordan boy is a fine boy, and you ought to consider him for a job at your law firm," that's when I learned about job referral, and that job referral by Kenneth Days, now going to Don Hollowell, got me a job as a civil rights lawyer working for Don Hollowell for $15 a week.

I have never forgotten Kenneth Days' generosity. And given the fact that all of the other doors for employment as a black lawyer graduating from Howard University were open to me, that's always--that's always been etched in my heart and my mind, and as a result, because I stand on Mr. Days' shoulders and Don Hollowell's shoulders, I felt some responsibility to the extent that I could be helpful or got in a position to be helpful, that I would do that.

And there is I think ample evidence, both in the media and by individuals across this country, that at such times that I have been presented with that opportunity that I have taken advantage of that opportunity, and I think that I have been successful at it.

Q Was your assistance to Ms. Lewinsky which you have described in any way dependent upon her doing anything
MR. KENDALL: I have no further questions.

MR. HUTCHINSON: Nothing further.

SENATOR THOMPSON: All right.

THE WITNESS: Mr. Chairman, may I be just permitted a moment of personal privilege? I don’t know about the rules here, but, uh, I’d like to say something if you would permit.

MR. HUTCHINSON: Mr. Chairman--

SENATOR THOMPSON: Well, Mr. Jordan, quite frankly, it depends on what the subject matter is and what you’d like--

THE WITNESS: Well, it won’t be a declaration of war.

[Laughter.]

SENATOR THOMPSON: Counsel, did you have--

MR. HUTCHINSON: I would reserve the objection. I think that’s permissible under the rules. So I would state my objection, let him answer it, and if— we can debate that if it becomes an issue in the Senate. I’d like to reserve the objection.

SENATOR THOMPSON: All right.

THE WITNESS: It’s just something I want you, Mr. Hutchinson, and the House Managers to understand about
Vernon Jordan. And that is, you know, it's a very long way
from the first public housing project in this country for
black people, where I grew up. It's a long way from there
to a corner office at Akin Gump. It's a long way from
University Homes to the corporate board rooms of America.
It's a long way from University Homes to the Oval Office.
And I have made that journey understanding one thing, and
that is that the only thing I have in this world that
belongs to me in fee simple absolute, completely and
totally, is my integrity.

My corner office at Akin Gump is at best tenuous.
My house, my home, is at best tenuous. My bank account, my
stocks and my bonds, they are ultimately of no moment.

But what matters most to me, and what was taught
to me by my mother, is that the only thing that I own
totally and completely is my integrity. And my integrity
has been on trial here, and I want to tell you that nothing
is more important to me than that.

The President is my friend. He was before this
happened, he is now, and he will be when this is over. But
he is not a friend in that I have no friends for whom I
would sacrifice my integrity. And I want you to understand
that.

SENATOR THOMPSON: Thank you, Mr. Jordan.

If there is no further question, then this
deposition is completed, and we stand adjourned.

THE WITNESS: Thank you.

THE VIDEOGRAPHER: This concludes the deposition

of Vernon E. Jordan, Jr. We are going off the record at

1421 hours. The total number of tapes used today is two.

[Whereupon, at 2:21 p.m., the deposition was

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
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
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.

Salary: 833-DC-00000981

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
$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.
### Presidential Call Log

**Date:** December 19th, 1997

<table>
<thead>
<tr>
<th>TIME</th>
<th>PLACED</th>
<th>DISC</th>
<th>NAME</th>
<th>ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>3:51</td>
<td></td>
<td></td>
<td>Mr. Vernon E. Jordan, Jr.</td>
<td>OFF: WASHINGTON, D.C.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Mr. Vernon Jordan TAD</td>
<td>WITH MS. DEBRA SCHIFF</td>
</tr>
</tbody>
</table>

**Exhibit:** JORDAN DEP 3

**REDACTED**

**GRAND JURY EXHIBIT IDENTIFICATION NUMBER:** 1178-DC-00000013

---

2388 VOL. III: DEPOSITIONS AND AFFIDAVITS
Friday 12-19-97 Cont'd

Name: Monica Lawrence
Time: 4:47
Contact: J. Jordan
## The White House

**WASHINGTON**

### Presidential Call Log

**December 19th, 1997**

<table>
<thead>
<tr>
<th>Time</th>
<th>Name</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:57 PM</td>
<td>Mr. Vernon E. Jordan, Jr.</td>
<td>Tel-OK 5:02 P.M.</td>
</tr>
</tbody>
</table>

**1178-DC-00000014

REDACTED

EXHIBIT JORDAN

DEP

- 0 004988
<table>
<thead>
<tr>
<th>ITEM</th>
<th>PRICE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 O. JUICE</td>
<td>7.75</td>
</tr>
<tr>
<td>1 COFFEE</td>
<td>5.00</td>
</tr>
<tr>
<td>1 OMELET</td>
<td>9.75</td>
</tr>
<tr>
<td>1 ENGLISH PUDDING</td>
<td>1.00</td>
</tr>
<tr>
<td>1 HOT CEREAL</td>
<td>7.75</td>
</tr>
<tr>
<td>FOOD SALES</td>
<td>20.25</td>
</tr>
<tr>
<td>SERVICE CHARGES</td>
<td>3.00</td>
</tr>
<tr>
<td>TIP</td>
<td>1.25</td>
</tr>
<tr>
<td>TOTAL PAID</td>
<td>77.79</td>
</tr>
<tr>
<td>* CHARGE TIP</td>
<td>5.00</td>
</tr>
<tr>
<td>TAX</td>
<td>12.99</td>
</tr>
<tr>
<td>AMERICAN EXPRESS</td>
<td>22.79</td>
</tr>
<tr>
<td>TOTAL CLOSED SALES</td>
<td>$147.49</td>
</tr>
</tbody>
</table>

**Receipt Details:**
- Date: 7/1
- Itemized receipt for one customer.
AFFIDAVIT OF JANE DOE # 6

1. My name is Jane Doe #6. I am 24 years old and currently reside at __________.

2. On December 19, 1997, I was served with a subpoena from the plaintiff to give a deposition and to produce documents the lawsuit filed by Paula Corbin Jones against President William Jefferson Clinton and Danny Ferguson.

3. I can not fathom any reason that the plaintiff would seek information from me for her case.

4. I have never met Ms. Jones, nor do I have any information regarding the events she alleges occurred at the Excelsior Hotel on May 8, 1991 or any other information concerning any of the allegations in her case.

5. I worked at the White House in the summer of 1992 as a White House intern. Beginning in December, 1995, I worked in the Office of Legislative Affairs as a staff assistant to the Assistant Secretary for Public Affairs at the U.S. Department of Defense. I maintained that job until December 26, 1997. I was currently unemployed but seeking a new job.

6. In the course of my employment at the White House, I met President Clinton several times. I also saw the President at a number of social functions held at the White House. When I worked as an intern, he appeared at occasional functions attended by other interns. The correspondence I drafted while working at the Office of Legislative Affairs was seen and edited by supervisors who either had the President's signature affixed. I believe, had the President sign the correspondence itself.

7. I have the utmost respect for the President who always behaved appropriately in my presence.

8. I have never had a sexual relationship with President Clinton. He did not propose that we have a sexual relationship, he did not offer me employment or other benefits in exchange for sexual relationship, he did not deny me employment or other benefits for rejecting a sexual relationship. I do not know of a
other person who had a sexual relationship with the President, offered employment or other benefits in exchange for a sexual relationship, or was denied employment or other benefits for rejecting a sexual relationship. The occasions that I saw the President after I left my employment at the White House in April 1996, were official receptions, formal functions or events related to the U.S. Department of Defense, where I was working at the time. There were other people present on those occasions.

9. Since I do not possess any information that could possibly be relevant to the allegations made by Paula Jones or that is not admissible evidence in this case, I asked my attorney to provide this affidavit to plaintiff’s counsel. Requiring my deposition in this matter would cause disruption to my life, especially since I am looking for employment. Unwarranted attorney’s fees and costs would constitute an invasion of my right to privacy.

I declare under the penalty of perjury that the foregoing is true and correct.

[Signature]
MONICA L. LEMINSKY
DISTRICT OF COLUMBIA, ss:

MONICA S. LEWINSKY, being first duly sworn on oath according to law, deposes and says that she has read the foregoing AFFIDAVIT OF JANE DOE #6 by her subscribed, that the matters stated herein are true to the best of her information, knowledge, and belief.

\[\text{Signature: Monica S. Lewinsky}\]

SUBSCRIBED AND SWORN to before me this 7th day of January 1998.

\[\text{Signature: Kathleen M. Primeau}\]

NOTARY PUBLIC, D.C.

My Commission expires:

\[\text{Commission expires August 31, 1998}\]

\[\text{Number: 842-DC-00000316}\]
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.
<table>
<thead>
<tr>
<th>Deposition Exhibit</th>
<th>Binder Tab</th>
<th>Record Cite</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>29</td>
<td>Vol IV, Pt 2, page 1865</td>
</tr>
<tr>
<td></td>
<td></td>
<td>See also:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(Vol III, Pt 1, page 157)</td>
</tr>
<tr>
<td>8</td>
<td>39</td>
<td>Vol IV, Pt 2, page 1884</td>
</tr>
<tr>
<td></td>
<td></td>
<td>See also:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(Vol III, Pt 1, page 161)</td>
</tr>
</tbody>
</table>
### Telephone Calls

#### TABLE 31

<table>
<thead>
<tr>
<th>No.</th>
<th>Time</th>
<th>Call From</th>
<th>Call To</th>
<th>Length of Call</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1:47 PM</td>
<td>Ms. Lewinsky's office</td>
<td>Mr. Jordan's office</td>
<td>1:50</td>
</tr>
<tr>
<td>2</td>
<td>3:01 PM</td>
<td>Mr. Jordan's office</td>
<td>President Clinton; talked with Debra Schiff</td>
<td>1:00</td>
</tr>
<tr>
<td>3</td>
<td>4:17 PM</td>
<td>Mr. Jordan's office</td>
<td>White House Social Office</td>
<td>2:42</td>
</tr>
<tr>
<td>4</td>
<td>5:01 PM</td>
<td>President Clinton</td>
<td>Mr. Jordan's office</td>
<td>4:06*</td>
</tr>
<tr>
<td>5</td>
<td>5:06 PM</td>
<td>Mr. Jordan's office</td>
<td>Francis Carter's office</td>
<td>1:54</td>
</tr>
</tbody>
</table>

#### 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 5:03 PM.
## Telephone Calls

### TABLE 35

**January 6, 1998**

<table>
<thead>
<tr>
<th>No.</th>
<th>Time</th>
<th>Call from</th>
<th>Call to</th>
<th>Length of call</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>11:32 AM</td>
<td>Mr. Carter</td>
<td>Ms. Lewinsky's pager; message reads: &quot;PLEASE CALL FRANK CARTER @ [redacted]&quot;</td>
<td>N/A</td>
</tr>
<tr>
<td>2</td>
<td>2:08 PM</td>
<td>Mr. Jordan's office</td>
<td>Ms. Lewinsky's residence</td>
<td>1:48</td>
</tr>
<tr>
<td>3</td>
<td>3:14 PM</td>
<td>Mr. Carter</td>
<td>Ms. Lewinsky's pager; message reads: &quot;FRANK CARTER AT [redacted] I WILL SEE YOU TOMORROW MORNING AT 10:00 IN MY OFFICE.&quot;</td>
<td>N/A</td>
</tr>
<tr>
<td>4</td>
<td>3:26 PM</td>
<td>Mr. Jordan's office</td>
<td>Mr. Carter</td>
<td>6:42</td>
</tr>
<tr>
<td>5</td>
<td>3:38 PM</td>
<td>Mr. Jordan's office</td>
<td>Ms. Hertel, White House</td>
<td>2:12</td>
</tr>
<tr>
<td>6</td>
<td>3:48 PM</td>
<td>Mr. Jordan's office</td>
<td>Ms. Lewinsky's residence</td>
<td>0.24</td>
</tr>
<tr>
<td>7</td>
<td>3:49 PM</td>
<td>Mr. Jordan's office</td>
<td>Ms. Lewinsky at Ms. Finerman's residence</td>
<td>5:54</td>
</tr>
<tr>
<td>8</td>
<td>4:19 PM</td>
<td>President Clinton</td>
<td>Mr. Jordan's office</td>
<td>13:00</td>
</tr>
<tr>
<td>9</td>
<td>4:22 PM</td>
<td>Mr. Jordan's office</td>
<td>Mr. Carter</td>
<td>1:06</td>
</tr>
<tr>
<td>10</td>
<td>4:34 PM</td>
<td>Mr. Jordan's office</td>
<td>Mr. Carter</td>
<td>2:30</td>
</tr>
<tr>
<td>11</td>
<td>5:15 PM</td>
<td>Mr. Jordan's office</td>
<td>White House</td>
<td>4:06</td>
</tr>
</tbody>
</table>

## Source Documents

Calls 1 and 3: [831-DC-00000010] (Pager/Smart, all times have been adjusted from Pacific to Eastern Standard Time)

Calls 2, 4, 5, 6, 7, 9, 10, and 11: [V004-DC-00000195] (Akin, Gump, Strauss, Hauer & Feld call log)

Call 8: [1176-DC-00000016] (Presidential call log)
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 9:35
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. PETTerson, ESQ.
Special Counsel to the President
The White House
Washington, D.C. 20510

MAX STIER, ESQ.
Williams & Connolly
725 12th Street, N.W.
Washington, D.C. 20005

On Behalf of the Managers of the House of
Representatives:

Hon. JAMES E. ROGAN
Hon. LINDSAY O. GRAHAM
Hon. ASA HUTCHINSON
Hon. CHARLES T. CANADY
APPEARANCES: (continued)

On Behalf of the Deponent Sidney Blumenthal:

WILLIAM A. MCDANIEL, ESQ.
JO BENNETT MARSH, ESQ.
McDaniel & Marsh
118 West Mulberry Street
Baltimore, Maryland 21202-3600
(410) 685-3810

Senators Present:

HON. ARLEN SPECTER
HON. JOHN EDWARDS
HON. CHRISTOPHER J. DODD
HON. MIER DAVIES
HON. PATRICK J. LEAHY

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

COURT REPORTERS:

CATHY JARDIN, RPR
THOMAS C. BITISO, CVR-CN
Miller Reporting Company, Inc.
507 C Street, N.E.
Washington, D.C. 20002

VIDEOGRAPHERS:

THOMAS W. GLENDEER, CLVS
GREGORY K. SMITH
Video Age, Inc.
1522 K Street, N.W., Suite 215
Washington, D.C. 20005
<table>
<thead>
<tr>
<th>WITNESS</th>
<th>EXAMINATION BY COUNSEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sidney Blumenthal</td>
<td>10</td>
</tr>
<tr>
<td>By Mr. Regan</td>
<td></td>
</tr>
<tr>
<td>By Mr. Graham</td>
<td>39</td>
</tr>
<tr>
<td>Further By Mr. Graham</td>
<td>72</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EXHIBITS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>DEPOSITION EXHIBIT NO.</strong></td>
</tr>
<tr>
<td>White House Nos. S.B. 1 thru S.B. 7</td>
</tr>
<tr>
<td>Tab Nos. 15 and 20</td>
</tr>
<tr>
<td>Tab No. 10</td>
</tr>
<tr>
<td>Tab No. 9</td>
</tr>
</tbody>
</table>
THE VIDEOGRAPHER: We are going on the record at 9:15 a.m.

SENATOR SPECTER: For the record, Arlen Specter, along with my colleague, Senator John Edwards, having been appointed by the Majority Leader and the Democratic Leader of the United States Senate, acting jointly, to preside over this deposition which is being taken in the trial of the impeachment of William Jefferson Clinton, President of the United States.

The protocol of the proceedings calls for reading the following format: "The deposition is being conducted pursuant to Senate Resolution 30, which the Senate considered and agreed to on January 28th, 1999. Section 201 of that resolution authorized the issuance of a subpoena to Mr. Sidney Blumenthal for the taking of testimony on oral deposition. That subpoena was issued by Chief Justice Rehnquist on Friday, January 29th. Counsel for Mr. Blumenthal agreed to accept service of that subpoena, which was made on the same day."

"By unanimous consent of the Senate, the Majority Leader and the Democratic Leader were authorized, acting jointly, to determine the time and place for the taking of the depositions authorized by Senate Resolution 30. The
Leaders, through Senate Legal Counsel, have conferred with
counsel for Mr. Blumenthal, the House Managers and the
President's counsel and have determined, again acting
jointly, that Mr. Blumenthal's deposition should be--take
place on this day, Wednesday, February 3rd, 1999, in this
room, S-407, of the Capitol Building beginning at or about
9:00 a.m."

"By unanimous consent of the Senate, the time
allotted for examination of Mr. Blumenthal by the parties
shall not exceed 8 hours. Each side may examine Mr.
Blumenthal for up to 4 hours. Time consumed by objections
shall not be charged to the questioning period."

"Senate Legal Counsel shall advise the Presiding
Officers of the time spent in questioning by the parties.
The Presiding Officers anticipate that a 5-minute break will
be taken every hour, and the deposition will recess for 1
hour for lunch at approximately 1 p.m. Should the witness
desire a recess at any point, he should direct the request
to the Presiding Officers who will make every effort to
accommodate his request."

"At any point, if the reporter or videographer
needs a pause in the proceeding for technical reasons,
please make that known so we can accommodate you."

"According to the terms of Senate Resolution 30,
the scope of the examination of Mr. Blumenthal by the
parties shall be limited to the subject matter reflected in
the Senate record. The questioning will begin first by the
House Managers, to be followed by the President's counsel.
Subsequent questioning by the parties will be permitted
within the time allotted, but the scope of such questioning
shall be limited to the subject matter of the prior
questioning."

"Any objections by counsel for the witness or the
parties shall be directed to the Presiding Officer Senators,
who shall have authority to rule as an initial matter upon
any question arising out of the deposition. Rulings of the
Presiding Officers may be appealed to the full Senate
following the completion of the deposition. The Senate will
consider any such appeals when it next convenes in this
impeachment proceeding on Thursday, February 4th."

"The reporters shall note any objection upon the
record, but the examination shall proceed, and the witness
shall answer such question. The witness may refuse to
answer a question only when necessary to preserve a legally
recognized privilege or constitutional right."

"Section 205 of Senate Resolution 30 requires that
these depositions be conducted in private. Attendance at
this deposition is limited to the witness' counsel and his
wife, the House Managers and counsel, counsel for the
President, the Presiding Officer Senators, Senate Legal
Counsel and Deputy Legal Counsel, Senate personnel whose presence is required as determined by the Majority Leader and the Democratic Leader, and those persons whose attendance is required to make and preserve a record of the proceedings."

"I note that according to the terms of Section 205, all present must maintain the confidentiality of the proceedings. For Senators and Senate employees, they should be aware that this deposition is a confidential proceeding of the Senate, under Senate Rule 29.5. This deposition may be discussed only with Members of the Senate and staff designated by Members. House Managers and House employees may only discuss this deposition with fellow managers and staff designated by the managers. The President's counsel may only discuss this deposition with the President and counsel and staff representing the President in this matter. The witness, his counsel and his wife may only discuss this deposition with each other."

"This injunction remains in effect unless ordered otherwise by the United States Senate. Moreover, any record of this deposition made available must similarly be kept confidential until further order of the United States Senate. All persons are admonished to conduct themselves accordingly."

"A videotape record and transcription of this
deposition are being made and will be made available for
view by Members of the Senate, one designated staff member
per Senator, the Chief Justice of the United States, the
House Managers, the President's counsel and the witness'
counsel for their review in connection with the impeachment
proceedings."

Senator Edwards, would you care to add anything?

SENATOR EDWARDS: No, except I think we should
emphasize, Senator Specter, the provisions of Section 205
and the confidential nature of these proceedings.

SENATOR SPECTER: At this time, according to the
script, I am inviting everybody present around the table to
introduce themselves. Let's start with you.

MR. BREUER: I am Lanny Breuer, the Special
Counsel to the President, representing the White House.

MS. PETERSON: Michelle Peterson, from the White
House Counsel's Office.

MR. STIER: Max Stier, with Williams & Connolly.

MS. MARSH: Jo Bennett Marsh, counsel for Sidney
Blumenthal.

MR. MCDANIEL: William McDaniel, representing Mr.
Blumenthal.

MR. FRANKEL: Morgan Frankel, Deputy Senate Legal
Counsel.

MR. GRIFFITH: Tom Griffith, Senate Legal Counsel.
MR. GRAHAM: Lindsey Graham, House Manager.

MR. ROGAN: James E. Rogan, House Manager.

SENATOR SPECTER: I also note the presence in the
room of our colleagues who have been present at these
depositions, Senators Mike DeWine, Fred Thompson, Pat Leahy,
Chris Dodd, who have been appointed by the Majority and
Minority Leadership.

The videographers today are Thomas Glender and
Gregory Smith, employed by Video Age of Washington, D.C.
The court reporters today are Cathy Jardim and Christopher
Birsko of Miller Reporting Service.

Any questions from the parties or counsel?

MR. McDaniel: No, thank you, sir.

SENATOR SPECTER: If none, I will swear the
witness.

Mr. Blumenthal, will you please stand up and raise
your right hand?

You, Sidney Blumenthal, do swear that the evidence
you shall give in this case now pending between the United
States and William Jefferson Clinton, President of the
United States, shall be the truth, the whole truth, and
nothing but the truth, so help you, God?

MR. BLUMENTHAL: I do.

Whereupon,

SIDNEY BLUMENTHAL
was called as a witness and, after having been first duly
sworn by Senator Specter, was examined and testified as
follows:

SENATOR SPECTER: Thank you.
THE WITNESS: Thank you.
SENATOR SPECTER: The House Managers may begin
their questioning.
MR. ROGAN: Thank you, Senator.
EXAMINATION BY HOUSE MANAGERS
BY MR. ROGAN:
Q Mr. Blumenthal, first, good morning.
A Good morning to you.
Q My name is Jim Rogan. As you know, I am one of
the House Managers and will be conducting this deposition
pursuant to authority from the United States Senate.
First, as a preliminary matter, we have never had
the pleasure of meeting or speaking until this morning,
correct?
A That's correct.
Q If any question I ask is unclear or is in any way
ambiguous, if you would please call that to my attention, I
will be happy to try to restate it or rephrase the question.
A Thank you.
Q Mr. Blumenthal, where are you currently employed?
A At the White House.
Q Is that in the Executive Office of the President?
A It is.
Q What is your current title?
A My title is Assistant to the President.
Q Was that your title on January 21st, 1998?
A It was.
Q For the record, that is the date that The Washington Post story appeared that essentially broke the
Monica Lewinsky story?
A Yes.
Q On that date, were you the Assistant to the
President as to any specific subject matter?
A I dealt with a variety of areas.
Q Did your duties entail any specific matter, or
were you essentially a jack-of-all-trades at the White House
for the President?
A Well, I was hired to help the President develop
his ideas and themes about the new consensus for the
country, and I was hired to deal with problems like the
impact of globalization, democracy internationally and
domestically, the future of civil society, and the
Anglo-American Project; and I also was hired to work on
major speeches.
Q You testified previously that your duties are such
as the President and Chief of Staff shall decide. Would
that be a fair characterization?

A  Oh, yes.

Q  How long have you been employed in this capacity?

A  Since August 11th, 1997.

Q  And in the course of your duties, do you personally advise the President as to the matters that you just shared with us?

A  Yes.

Q  How often do you meet with the President personally to advise him?

A  It varies. Sometimes several times a week; sometimes I go without seeing him for a number of weeks at a time.

Q  Is dealing with the media part of your--your job?

A  Yes. It's part of my job and part of the job of most people in the White House.

Q  Was that also one of your responsibilities on January 21st, 1998, when the Monica Lewinsky story broke?

A  Yes.

Q  You previously testified that you had a role in the Monica Lewinsky matter after the story broke in The Washington Post on that date, at least in reference to your White House duties; is that correct?

A  I'm unclear on what you mean by "a role."

Q  Specifically, you testified that you attended
meetings in the White House in the Office of Legal Counsel in the morning and in the evening almost every day once the story broke?

A  Yes.

Q  And what times did those meetings occur after the story broke, these regular meetings?

A  The morning meetings occurred around 8:30, after the morning message meeting, and the evening meetings occurred around 6:45.

Q  Are those meetings still ongoing?

A  No.

Q  Can you tell me when those meetings ended?

A  Oh, I'd say about the time that the impeachment trial started.

Q  That would be about a month or--about a month ago?

A  Yeah, something like that.

Q  Thank you.

A  I don't recall exactly.

Q  Sure. But up until that point, were these essentially regularly scheduled meetings, twice a day, 8:30 in the morning and 6:45 in the evening?

A  Right.

Q  Did you generally attend those meetings?

A  Generally.

Q  Now, initially, when you testified before the
grand jury on February 26th, 1998, your first grand jury
appearance, you stated that these twice-daily meetings dealt
exclusively with the Monica Lewinsky matter, correct?
A  They dealt with our press reaction, how we would
respond to press reports dealing with it. This was a huge
story, and we were being inundated with hundreds of calls.
Q  Right.
A  So--
Q  What I'm--what I'm trying to decipher is that at
least initially, at the time of your first grand jury
appearance, which was about a month after the story broke--
A  Right.
Q  --the meetings were exclusively related to Monica
Lewinsky. Is that correct?
A  Pretty much.
Q  And then, 4 months later, when you testified
before the grand jury in June, you said these meetings were
still ongoing, and you referenced them at that time as
discussing the policy, political, legal and media impact of
scandals and how to deal with them. Do you remember that
testimony?
A  If I could see it.
Q  Certainly. I'm happy to invite your attention to
your grand jury testimony of June 4th, 1998, page 25, lines
1 through 5.
MR. ROGAN: And that would be, for the Senators' and counsel's benefit--I believe that's in Tab 4 of the materials provided.

[Witness perusing document.]

THE WITNESS: Right. I see it.

BY MR. ROGAN:

Q You've had a chance to review that, Mr. Blumenthal?

A I have.

Q And that—that's correct testimony?

A Yes.

Q Thank you.

At the time you spoke of—you used the word "scandals" in the plural, and you were asked on June 4th what other scandals were discussed and you said they range from the Paula Jones trial to our China policy. Is that a fair statement?

A Oh, yes, yes. I do.

Q Who typically attended those meetings?

A As I recall, there were about a dozen or so people, sometimes more, sometimes less.

Q Do you remember the names of the people?

A I'll try to.

Q Would it be helpful if I directed your attention to a couple of passages in the grand jury testimony?
A Sure, if you’d like.
MR. ROGAN: Inviting the Senate and counsel’s
attention to the February 26th grand jury testimony, page
11, lines 2 through 16.
[Witness perusing document.]
BY MR. ROGAN:
Q That would be Tab Number 1.
A Right, I see that.
What it says here is that the names listed are
Charles Ruff, Lanny Breuer, who is right over here, Cheryl
Mills, Bruce Lindsey, John Podesta, Rahm Emanuel, Paul
Begala, Jim Kennedy, Mike McCurry, Joe Lockhart, Ann Lewis,
Adam Goldberg, Don Goldberg, and that’s--those are the names
that I—that I recall.
Q Thank you.
And just for my benefit, Mr. Ruff, Mr. Breuer, Ms.
Mills, and Mr. Lindsey, those are all White House counsel?
A Yes.
Q Could you just briefly identify for the record the
other individuals that are--that are listed in your
testimony?
A Sure. John Podesta was Deputy Chief of Staff.
Rahm Emanuel was a Senior Advisor. Paul Begala had the
title of Counselor. Jim Kennedy was in the Legal Counsel
Office. Mike McCurry was Press Secretary. Joe Lockhart at that time was Deputy Press Secretary. Ann Lewis was Director of Communications, still is. Adam Goldburg worked as an Assistant in the Legal Counsel Office, and Don Goldberg worked in Legislative Affairs.

Q Thank you.

Mr. Blumenthal, specifically inviting your attention to January 21st, 1998, you testified before the grand jury that on that date, you personally spoke to the President regarding the Monica Lewinsky matter, correct?

A Yes.

Q When you spoke to the President, did you discuss the Washington Post story about Ms. Lewinsky that appeared that morning?

A I don’t recall if we talked about that article specifically.

Q Do you recall on June 25th testifying before the grand jury, and I’m quoting, “We were speaking about the story that appeared that morning”?

A Right. We were--we were speaking about that story, but I don’t know if we referred to The Post.

Q Thank you.

You are familiar with The Washington Post story that broke that day?

A I am.
Q That story essentially stated that the Office of Independent Counsel was investigating whether the President made false statements about his relationship with Ms. Lewinsky in the Jones case, correct, to the best of your recollection?

A If you could repeat that?

Q Sure. The story stated that the Office of Independent Counsel was investigating whether the President made false statements about his relationship with Ms. Lewinsky in the Jones case.

A Right.

Q And also that the Office of Independent Counsel was investigating whether the President obstructed justice in the Jones case. Is that your best recollection of what that story was about?

A Yes.

Q How did you end up speaking to the President on that specific date?

A I don’t remember exactly whether he had summoned me or whether I had asked to speak him—to him.

Q And I realize, by the way, I—just so you know, I’m not trying to trick you or anything. I realize this is a year later—

A Right.

Q —and your testimony was many months ago, and so
if I invite your attention to previous grand jury testimony
to refresh your recollection, I don't want you to feel that
in any way I'm trying to imply that you're not being candid
in your testimony.

With that, if I may invite your--your attention to
the June 4th grand jury testimony on page 47, lines 5
through 6.

[Witness perusing document.]

BY MR. ROGAN:

Q  Let me see if this helps to refresh your
recolletion. You said, "It was about a week before the
State of the Union speech."

A  I see.

Q  "I was in my office, and the President asked me to
come to his office."

Does that help to refresh your recollection?

A  Yes.

Q  And so you now remember that the President asked
to speak with you?

A  Yes.

Q  Did you go to the Oval Office?

A  Yes.

Q  During that conversation, were you alone with the
President?

A  I was.
Q. Do you remember if the door was closed?
A. It was.
Q. When you met with the President, did you relate to him a conversation you had with the First Lady earlier that day?
A. I did.
Q. What did you tell the President the First Lady told you earlier that day?
A. I believe that I told him that the First Lady had called me earlier in the day, and in the light of the story in The Post had told me that the President had helped troubled people in the past and that he had done it many times and that he was a compassionate person and that he helped people also out of his religious conviction and that this was part of--part of his nature.
Q. And did she also tell you that one of the other reasons he helped people was out of his personal temperament?
A. Yes. That's what I mean by that.
Q. And the First Lady also at least shared with you her opinion that he was being attacked for political motives?
MR. McDaniel: Can I get a clarification, Senator--Senator Specter? The earlier question, I thought, had been what Mr. Blumenthal had relayed to the President
MR. ROGAN: That's correct.

MR. McDANIEL: And now the questions are back—it seems to me we have moved to another topic--

MR. ROGAN: No. That's--

MR. McDANIEL: --which is what--

MR. ROGAN: I'm--

MR. McDANIEL: --did the First Lady say,

MR. ROGAN: And I thank--I thank the gentleman for that clarification. I'm specifically asking what the witness relayed to the President respecting his conversation with--his earlier conversation with the First Lady.

MR. McDANIEL: Thank you.

Do you understand that, what he said?

THE WITNESS: I understand the distinction, and I don't--

BY MR. ROGAN:

Q I'll restate the question, if that would help.

A Please.

Q Do you remember telling the President that the First Lady said to you that she felt that with--in reference to this story that he was being attacked for political motives?

A I remember her saying that to me, yes.

Q And you relayed that to the President?
A I'm not sure I relayed that to the President. I may have just relayed the gist of the conversation to him. I don't--I'm not sure whether I relayed the entire conversation.

MR. ROGAN: Inviting the Senators' and counsel's attention to the June 4th, 1998, testimony of Mr. Blumenthal, page 47, beginning at line 5.

BY MR. ROGAN:

Q Mr. Blumenthal, let me just read a passage to you and tell me if this helps to refresh your memory.

A Mm-hmm.

MR. ROGAN: Do you have that, Lanny?

MR. BREUER: Yes, I do. Thank you.

BY MR. ROGAN:

Q Reading at line--at line 5, "I was in my office, and the President asked me to come to the Oval Office. I was seeing him frequently in this period about the State of the Union and Blair's visit"--and I--that was Prime Minister Tony Blair, as an aside, correct?

A That's right.

Q Thank you.

And then again, reading at line 7, "So I went up to the Oval Office and I began the discussion, and I said that I had received--that I had spoken to the First Lady that day in the afternoon about the story that had broke in
the morning, and I related to the President my conversation
with the First Lady and the conversation went as follows.
The First Lady said that she was distressed that the
President was being attacked, in her view, for political
motives for his ministry of a troubled person. She said
that the President ministers to troubled people all the
time," and then it goes on to--
A  Right.
Q  --relate the substance of the answer you just
gave.
Does that help to refresh your recollection with
respect to what you told the President, the First Lady had
said earlier?
A  Yes.
Q  Thank you.
And do you now remember that the First Lady had
indicated to you that she felt the President was being
attacked for political motives?
A  Well, I remember she said that to me.
Q  And just getting us back on track, a few moments
ago, I think you--you shared with us that the First Lady
said that the President helped troubled people and he had
done it many times in the past.
A  Yes.
Q  Do you remember testifying before the grand jury
on that subject, saying that the First Lady said he has done
dozens, if not hundreds, of times with people--
A Yes.
Q --with troubled people?
A I recall that.
Q After you related the conversation that you had
with the First Lady to the President, what do you remember
saying to the President next about the subject of Monica
Lewinsky?
A Well, I recall telling him that I understood he
felt that way, and that he did help people, but that he
should stop trying to help troubled people personally; that
troubled people are troubled and that they can get you in a
lot of messes and that you had to cut yourself off from it
and you just had to do it. That's what I recall saying to
him.
Q Do you also remember in that conversation saying
to him, "You really need to not do that at this point, that
you can't get near anybody who is even remotely crazy.
You're President"?
A Yes. I think that was a little later in the
conversation, but I do recall saying that.
Q When you told the President that he should avoid
contact with troubled people, what did the President say to
you in response?
A: I'm trying to remember the sequence of it. He—he said that was very difficult for him. He said he— he felt a need to help troubled people, and it was hard for him to—to cut himself off from doing that.

Q: Do you remember him saying specifically, "It's very difficult for me to do that, given how I am. I want to help people"?

A: I recall—I recall that.

Q: And when the President referred to trying to help people, did you understand him in that conversation to be referring to Monica Lewinsky?

A: I think it included Monica Lewinsky, but also many others.

Q: Right, but it was your understanding that he was all—he was specifically referring to Monica Lewinsky in that list of people that he tried to help?

A: I believe that—that was implied.

Q: Do you remember being asked that question before the grand jury and giving the answer, "I understood that"?

A: If you could point it out to me, I'd be happy to see it.

Q: Certainly.

MR. ROGAN: Inviting the Senators' and counsel's attention to the June 25th, 1998, grand jury, page 5, I believe it's at lines 6 through 8.
[Witness perusing document.]

THE WITNESS: Yes, I see that. Thank you.

BY MR. ROGAN:

Q You recall that now?

A Yes.

Q Thank you.

Mr. Blumenthal, did the President then relate a conversation he had with Dick Morris to you?

A He did.

Q What was the substance of that conversation, as the President related it to you?

A He said that he had spoken to Dick Morris earlier that day, and that Dick Morris had told him that if Nixon, Richard Nixon, had given a nationally televised speech at the beginning of the Watergate affair, acknowledging everything he had done wrong, he may well have survived it, and that was the conversation that Dick Morris— that's what Dick Morris said to the President.

Q Did it sound to you like the President was suggesting perhaps he would go on television and give a national speech?

A Well, I don't know. I didn't know.

Q And when the President related the substance of his conversation with Dick Morris to you, how did you respond to that?
Q Did he reply?
A He did.
Q What did he say?
A He said, "I haven't done anything wrong."
Q And what did you say to that response?
A Well, I said, as I recall, "That's one of the stupidest ideas I ever heard. If you haven't done anything wrong, why would you do that?"
Q Did the President then give you his account of what happened between him and Monica Lewinsky?
A As I recall, he did.
Q What did the President tell you?
A He, uh--he spoke, uh, fairly rapidly, as I recall, at that point and said that she had come on to him and made a demand for sex, that he had rebuffed her, turned her down, and that she, uh, threatened him. And, uh, he said that she said to him, uh, that she was called "the stalker" by her peers and that she hated the term, and that she would claim that they had had an affair whether they had or they hadn't, and that she would tell people.
Q Do you remember him also saying that the reason Monica Lewinsky would tell people that is because then she wouldn't be known by her peers as "the stalker" anymore?
A: Yes, that’s right.
Q: Do you remember the President also saying that—
and I’m quoting—"I’ve gone down that road before. I’ve
caused pain for a lot of people. I’m not going to do that
again"?
A: Yes. He told me that.
Q: And that was in the same conversation that you had
with the President?
A: Right, in—in that sequence.
Q: Can you describe for us the President’s demeanor
when he shared this information with you?
A: Yes. He was, uh, very upset. I thought he was, a
man in anguish.
Q: And at that point, did you repeat your earlier
admonition to him as far as not trying to help troubled
people?
A: I did. I—I think that’s when I told him that you
can’t get near crazy people, uh, or troubled people. Uh,
you’re President; you just have to separate yourself from
this.
Q: And I’m not sure, based on your testimony, if you
gave that admonition to him once or twice. Let me—let me
clarify for you why my questioning suggested it was twice.
In your grand jury testimony on June the 4th, at page 49,
beginning at line 25, you began the sentence by saying, and
I quote, "And I repeated to the President."--
A Right.
Q ""that he really needed never to be near people
who were"--
A Right.
Q "troubled like this," and so forth. Do you
remember now if you--if that was correct? Did you find
yourself in that conversation having to repeat the
admonition to him that you'd given earlier?
A I'm sure I did. Uh, I felt--I felt that pretty
strongly. He shouldn't be involved with troubled people.
Q Do you remember the President also saying
something about being like a character in a novel?
A I do.
Q What did he say?
A Uh, he said to me, uh, that, uh, he felt like a
closest a character in a novel. Uh, he felt like somebody, uh,
surrounded by, uh, an oppressive environment that was
creating a lie about him. He said he felt like, uh, the
closest to the novel Darkness at Noon.
Q Did he also say he felt like he can't get the
truth out?
A Yes, I---I believe he said that.
Q Politicians are always loath to confess their
ignorance, particularly on videotape. I will do so. I'm
unfamiliar with the novel *Darkness at Noon*. Did you--do you have any familiarity with that, or did you understand what the President meant by that?

A I--I understood what he meant. I--I was familiar with the book.

Q What--what did he mean by that, per your understanding?

a Uh, the book is by Arthur Koestler, who was somebody who had been a communist and had become disillusioned with communism. And it's an anti-communist novel. It's about, uh, uh, the Stalinist purge trials and somebody who was a loyal communist who then is put in one of Stalin's prisons and held on trial and executed, uh, and it's about his trial.

Q Did you understand what the President was trying to communicate when he related his situation to the character in that novel?

A I think he felt that the world was against him.

Q I thought only Members of Congress felt that way.

Mr. Blumenthal, did you ever ask the President if he was ever alone with Monica Lewinsky?

A I did.

Q What was his response?

A I asked him a number of questions that appeared in the press that day. I asked him, uh, if he were alone, and
he said that, uh, he was within eyesight or earshot of
someone when he was with her.

Q What other questions do you remember asking him?
A Uh, there was a story in the paper that, uh, there
were recorded messages, uh, left by him on her voice-mail
and I asked him if that were true.

Q What did he say?
A He said, uh, that it was, that, uh, he had called
her.

Q You had asked him about a press account that said
there were potentially a number of telephone messages left
by the President for Monica Lewinsky. And he relayed to you
that he called her. Did he tell you how many times he
called her?
A He--he did. He said he called once. He said he
called when, uh, Betty Currie's brother had died, to tell
her that.

Q And other than that one time that he shared that
information with you, he shared no other information
respecting additional calls?
A No.

Q He never indicated to you that there were over 50
television conversations between himself and Monica Lewinsky?
A No.

Q Based on your conversation with the President at
that time, would it have surprised you to know that there were over 50—there were records of over 50 telephone conversations with Monica Lewinsky and the President?

A  Would I have been surprised at that time?

Q  Yes.

A  Uh, I—to see those records and if he—I don’t fully grasp the question here. Could you—would I have been surprised?

Q  Based on the President’s response to your question at that time, would it have surprised you to have been told or to have later learned that there were over 50 recorded—50 conversations between the President and Ms. Lewinsky?

A  I did later learn that, uh, as the whole country did, uh, and I was surprised.

Q  When the President told you that Monica Lewinsky threatened him, did you ever feel compelled to report that information to the Secret Service?

A  No.

Q  The FBI or any other law enforcement organisation?

A  No.

Q  I’m assuming that a threat to the President from somebody in the White House would normally send off alarm bells among staff.

A  It wouldn’t—

MR. McDANIEL: Well, I’d like to object to the
question, Senator. There's no testimony that Mr. Blumenthal learned of a threat contemporaneously with it being made by someone in the White House. This is a threat that was relayed to him sometime afterwards by someone who was no longer employed in the White House. So I think the question doesn't relate to the testimony of this witness.

MR. ROGAN: Respectfully, I'm not sure what the legal basis of the objection is. The evidence before us is that the President told the witness that Monica Lewinsky threatened him.

[Senators Specter and Edwards conferring.]

SENATOR SPECTER: We've conferred and overrule the objection on the ground that it calls for an answer; that, however the witness chooses to answer it, was not a contemporaneous threat, or he thought it was stale, or whatever he thinks. But the objection is overruled.

MR. ROGAN: Thank you.

BY MR. ROGAN:

Q Let me--let me restate the question, if I may. Mr. Blumenthal, would a threat--

SENATOR SPECTER: We withdraw the ruling.

[Laughter.]

MR. McDANIEL: I withdraw my objection, then.

[Laughter.]

MR. ROGAN: Senator Specter, the ruling is just
fine by my light. I'm just going to try to simplify the
question for the witness' benefit.

SENATOR SPECTER: We'll hold in abeyance a
decision on whether to reinstate the ruling.

MR. ROGAN: Thank you. Maybe I should just quit
while I'm ahead and have the question read back.

BY MR. ROGAN:

Q  Basically, Mr. Blumenthal, what I'm asking is, I
mean, normally, would a threat from somebody against the
President in the White House typically require some sort of
report being made to a law enforcement agency?

A  Uh, in the abstract, yes.

Q  This conversation that you had with the President
on January the 21st, 1998, how did that conversation
conclude?

A  Uh, I believe we, uh--well, I believe after that,
I said to the President that, uh--who was--seemed to me to
be upset, that you needed to find some sure footing and to
be confident. And, uh, we went on, I believe, to discuss
the State of the Union.

Q  You went on to other business?

A  Yes, we went on to talk about public policy.

Q  When this conversation with the President
concluded as it related to Monica Lewinsky, what were your
feelings toward the President's statement?
A Uh, well, they were complex. Uh, I believed him.

uh, but I was also, uh--I thought he was very upset. That
troubled me. And I also was troubled by his association
with troubled people and thought this was not a good story
and thought he shouldn't be doing this.

Q Do you remember also testifying before the grand
jury that you felt that the President's story was a very
heartfelt story and that "he was pouring out his heart, and
I believed him"?

A Yes, that's what I told the grand jury, I believe;
right.

Q That was--that was how you interpreted the
President's story?

A Yes, I did. He was, uh--he seemed--he seemed
emotional.

Q When the President told you he was helping Monica
Lewinsky, did he ever describe to you how he might be
helping or ministering to her?

A No.

Q Did he ever describe how many times he may have
tried to help or minister to her?

A No.

Q Did he tell you how many times he visited with
Monica Lewinsky?

A No.
Q Did he tell you how many times Monica Lewinsky visited him in the Oval Office complex?
A No.
Q Did he tell you how many times he was alone with Monica Lewinsky?
A No.
Q He never described to you any intimate physical activity he may have had with Monica Lewinsky?
A Oh, no.
Q Did the President ever tell you that he gave any gifts to Monica Lewinsky?
A No.
Q Did he tell you that Monica Lewinsky gave him any gifts?
A No.
Q Based on the President's story as he related on January 21st, would it have surprised you to know at that time that there was a repeated gift exchange between Monica Lewinsky and the President?
A Well, I learned later about that, and I was surprised.
Q The President never told you that he engaged in occasional sexual banter with her on the telephone?
A No.
Q He never told you about any cover stories that he
and Monica Lewinsky may have developed to disguise a
relationship?

A  No.

Q  He never suggested to you that there might be some
physical evidence pointing to a physical relationship
between he--between himself and Monica Lewinsky?

A  No.

Q  Did the President ever discuss his grand jury--or
strike that.

Did the President ever discuss his deposition

A  Oh, no.

Q  Did he ever tell you that he denied under oath in
his Paula Jones deposition that he had an affair with Monica
Lewinsky?

A  No.

Q  Did the President ever tell you that he ministered
to anyone else who then made a sexual advance toward him?

A  No.

Q  Mr. Blumenthal, after you testified before the
grand jury, did you ever communicate to the President the
questions that you were asked?

A  No.

Q  After you testified before the grand jury, did you
ever communicate to the President the answers which you gave
to those questions?
A No.
Q After you were subpoenaed to testify but before
you testified before the Federal grand jury, did the
President ever recant his earlier statements to you about
Monica Lewinsky?
A No.
Q After you were subpoenaed but before you testified
before the federal grand jury, did the President ever say
that he did not want you to mislead the grand jury with a
false statement?
A No. We didn't have any subsequent conversation
about this matter.
Q So it would be fair also to say that after you
were subpoenaed but before you testified before the Federal
grand jury, the President never told you that he was not
being truthful with you in that January 21st conversation
about Monica Lewinsky?
A Uh, he never spoke to me about that at all.
Q The President never instructed you before your
testimony before the grand jury not to relay his false
account of his relationship with Monica Lewinsky?
A We--we didn't speak about anything.
Q And as to your testimony on all three appearances
before the grand jury on February 26th, June 4th and June
25th, 1998—as an aside, by the way, let me just say I think this question has been asked of all the witnesses, so this is not peculiar to you—but as to those three grand jury appearances, do you adopt as truth your testimony on all three of those occasions?

A Oh, yes.

MR. ROGAN: If I may have a moment?

SENATOR SPECTER: Of course. Would you like a short break?

MR. ROGAN: That might be convenient, Senator.

SENATOR SPECTER: All right. It’s a little past 10. We’ll take a 5-minute recess.

THE VIDEOGRAPHER: We’re going off the record at 10 o’clock a.m.

[Recess.]

THE VIDEOGRAPHER: We’re going back on the record at 10:12 a.m.

SENATOR SPECTER: We shall proceed; Mr. Graham questioning for the House Managers.

MR. GRAHAM: Thank you, Senator.

BY MR. GRAHAM:

Q Again, Mr. Blumenthal, if I ask you something that’s confusing, just slow me down and straighten me out here.

A Thank you.
Q Okay. I'm going to ask as direct, to-the-point questions as I can so we all can go home.

June 4th, 1998, when you testified to the grand jury, on page 49--I guess it's page 185 on tab 4.

MR. McDaniel: Page 49?

MR. Graham: Yes, sir.

MR. McDaniel: Thank you.

BY MR. GRAHAM:

Q That's where you start talking about the story that the President told you. Knowing what you know now, do you believe the President lied to you about his relationship with Ms. Lewinsky?

A I do.

Q I appreciate your honesty. You had raised executive privilege at some time in the past, I believe.

MR. McDaniel: I object, Senator. Mr. Blumenthal was a passive vessel for the raising of executive privilege by the President. It's not his privilege to assert, so the question, I think, is misleading.

BY MR. GRAHAM:

Q At any time--I'm sorry.

[Senators Specter and Edwards conferring.]

SENATOR SPECTER: Senator Edwards and I have conferred and believe that he can answer the question if he did not raise the privilege, so we will overrule the
SENATOR EDWARDS: Either he asserted it or it was asserted on his behalf.

THE WITNESS: If you could repeat it, please.

BY MR. GRAHAM:

Q I believe early on in your testimony and throughout your testimony to the grand jury, the idea of executive privilege covering your testimony or conversations with the President was raised. Is that correct?

A It was.

Q Do you believe the White House knew that this privilege would be asserted in your testimony? That was no surprise to them?

A Uh--

MR. ERBUER: I'm going to object. It's the White House's privilege to assert it could not have been surprised. It's a mischaracterization of the facts.

[Senators Specter and Edwards conferring.]

SENATOR SPECTER: Senator Edwards and I believe the objection is well-founded on the ground that he cannot testify as to what someone else knew. So would you rephrase the question? The objection will be sustained.

BY MR. GRAHAM:

Q When executive privilege was asserted, do you know how it came about? Do you have any knowledge of how it came
about?

A What I recall is that—in my first appearance
before the grand jury, I was asked questions about my
conversations with the President. And I went out into the
hall, asked if I could go out in the hall, and I spoke with
the White House legal counsel who was there, Cheryl Mills,
and said, "What do I say?"

Q And she said?

A And I was advised to assert privilege.

Q So the executive privilege assertion came about
from advice to you by White House counsel?

A Yes.

Q Now, you’ve stated, I think, very honestly, and I
appreciate, that you were lied to by the President. Is it a
fair statement, given your previous testimony concerning
your 30-minute conversation, that the President was trying
to portray himself as a victim of a relationship with Monica
Lewinsky?

A I think that’s the import of his whole story.

Q During this period of time, the Paula Jones
lawsuit, other allegations about relationships with the
President and other women were being made and found their
way in the press. Is that correct?

A Yes.

Q Now, when you have these morning meetings and
evening meetings about press strategy, I believe your
previous testimony goes along the lines that any time a
press report came out about a story between the President
and a woman, that you would sit down and strategise about
what to do. Is that correct?

A Well, we would, uh, talk about what the White
House spokesman would say about it.

Q Does the name "Kathleen Willey" mean anything to
you in that regard?

MR. BREUHR: I'm going to object. It's beyond the
scope of this deposition. In the proffer from the Managers,
they explicitly state the areas that they want to go into,
and they explicitly state that they want to speak to Mr.
Blumenthal about his January 21, 1996, conversation with the
President about Monica Lewinsky. And any aspects as to
Kathleen Willey are--have nothing to do with the Articles of
Impeachment, nor do they have anything to do with the
proffer made by the Managers, and it's beyond the scope of
this deposition.

SENATOR SPECTER: Just wait one second.

[Senators Specter and Edwards conferring.]

SENATOR SPECTER: Mr. Graham, as you know, the
scope of the examination of Mr. Blumenthal is limited by the
subject matters reflected in the Senate record. Are you
able to substantiate the Senate record as a basis for asking
the question?

MR. GRAHAM: I'm assuming, yes, Senator, that the
grand jury testimony of Mr. Blumenthal is part of the Senate
record. And on June 25th, 1998, on page 21, there's a
discussion between Mr. Blumenthal and the Independent
Counsel's Office about strategy meetings and other women,
and in that testimony, he mentions that "we discussed Paula
Jones, Kathleen Willey, in our strategy meeting."

And I think the question will not be as ominous as
some may think it sounds. I think I can get right to the
point pretty quickly about what I'm trying to do with--

SENATOR SPECTER: Well, would you make an offer of
proof so that we can see what the scope is that you have in
mind?

MR. GRAHAM: Basically, his testimony is that when
a press report came about concerning Ms. Jones or Kathleen
Willey or a relationship between the President and another
woman, they sat down and strategized about how to respond to
those press accounts, what to do and what to say—at least
that's what his testimony indicates. And I just want to ask
him, once the January 21st story about Ms. Lewinsky came
cut, how they discussed her in relationship to other
strategy meetings.

SENATOR SPECTER: Mr. Breuer, how would you
respond to Congressman Graham's statement that as he refers
MR. BREWER: Senator, I haven't seen the one
to a reference to Ms. Willey in the record?
reference, but I may—I would acknowledge that there may be
one passing reference to Ms. Willey in the voluminous
materials that are before us here in the grand jury,
Senator. But it's clearly not germane to this deposition.
It's clearly not germane to the proffer made by the Managers
about why Mr. Sidney Blumenthal was a witness. It is
clearly not germane to the Articles of Impeachment.

And, indeed, in Mr. Lindsey Graham's proffer just
now, he said that he wants to go back and ask about the
January 21 conversation. It's my view that Kathleen Willey
is tangential, at best, and is not germane to this
deposition and ought not to be inquired into.

SENATOR EDWARDS: And, Senator Specter, I would
ask that we go off the record for this discussion, given the
question of whether this is within the scope of the Senate
record.

SENATOR SPECTER: We shall go off the record.

THE VIDEOGRAPHER: We're going off the record at
10:20 a.m.

[Discussion off the record.]

THE VIDEOGRAPHER: We're going back on the record
at 10:48 a.m.

SENATOR SPECTER: Congressman Lindsey, you may
MR. GRAHAM: Thank you, sir.

BY MR. GRAHAM:

Q Thank you for your patience, Mr. Blumenthal. I appreciate it.

A Thank you.

Q Let's get back to the--we'll approach this topic another way and well try to tie it up at the end here. The January 21st article breaks, and I think it's in The Washington Post, is that correct, the January 21st article about Ms. Lewinsky being on tape, talking about her relationship with the President? Are you familiar with that article?

A I'm familiar with an article on January 21st in The Washington Post.

Q And what--what was the essence of that article, as you remember it?

A If you have it there, I'd be happy to look at it.

Q Yeah. Let's see if we can find it, what tab that is. Tab 7.

(Witness perusing document.)

THE WITNESS: Well--

BY MR. GRAHAM:

Q If you'd like a chance to read it over, just take your time.
A Yes. Thank you. 

(Witness perusing document.)

THE WITNESS: It's a long article.

BY MR. GRAHAM:

Q Yes, sir, it is, and just--

A Yeah.

Q --just take your time. I'm not going to give you a test on the article. I just wanted--

A No. I just wanted to read it.

Q --to refresh your memory. Absolutely, you take your time.

A I hope you don't mind if I took the time here.

Q No, sir. Are you--you're okay now?

A I am.

Q Okay. In essence, what this article is--is alleging is what we now know, the allegations that Ms. Lewinsky had a relationship with the President, that Mr. Jordan was trying to help her secure counsel, to file an affidavit saying they had no relationship, and the relationship on January 21st was being exposed through some tape recordings, supposedly, the Independent Counsel had access to between Ms. Lewinsky and Ms. Tripp. Is that correct?

A Well, there are a lot of questions in there.

Q Okay, yeah, and I'm sorry.
This article seems to suggest that Ms. Lewinsky is
telling a friend--
A  Mm-hmm.
Q  --that she has a relationship with the President,
a sexual relationship with the President.
A  Mm-hmm.
Q  You understand that from the article?
A  Yes.
Q  This article also alleges that an affidavit was
filed by Ms. Lewinsky denying that relationship, and Mr.
Jordan sought an attorney for her, a friend of the
President. Is that correct?
A  It says she filed an affidavit, and I'm just
looking for where it says that Jordan had secured the
attorney.
Q  The very first paragraph, let me read it. "The
Independent Counsel Kenneth Starr has expanded his
investigation of President Clinton to examine whether
Clinton and his close friend, Vernon Jordan, encouraged a
24-year-old"--
A  Right.
Q  --"former White House intern to lie to lawyers for
Paula Jones about whether the intern had an affair with the
President, sources close to the investigation said
yesterday."
A  Right.
Q  So I guess that first paragraph kind of sums up
the accusation.
A  I think--
Q  What type reaction did the White House have when
this--as you recall--when this article came to light?
A  I--I think the White House was overwhelmed with
press inquiries.
Q  Was there a sense of alarm that this was a bad
story?
A  Yes.
Q  And wasn't there a sense of reassurance by the
President himself that this was an untrue story?
A  The President did make a public statement that
afternoon.
Q  And I believe White House officials on his behalf
denied the essence of this story; is that correct?
A  Yes.
Q  And basically, you were passing along what
somebody you trust and admire told you to be the case, and
from the White House point of view, that was the response to
this story, that we deny these allegations.
MR. McDANIEL: Senator, I really object to the
question where we mix "you" and "we" and the "White House."
I'd like, if possible, for the question--if they want to
know what Mr. Blumenthal did, to ask him what he did, and
questions about what the White House did and what we and you
did.

MR. GRAHAM: That's fair enough.

MR. McDANIEL: Okay, we thank you.

SENATOR SPECTER: We think that's well-founded.

MR. GRAHAM: Yes, and I agree. I agree that is
well-founded.

BY MR. GRAHAM:

Q Did you have any discussions with White House
press people about the nature of this relationship after
this article broke?

A No.

Q Did you have any discussions with White House
lawyers after this article broke about the nature of the
relationship?

A No.

Q After you had the conversation with the President,
sometime the week of the 21st—I believe that's your
testimony—shortly after the news story broke, this
30-minute conversation where he tells you about—

A There's not a question.

Q Okay. Is that correct? When did you have this
conversation with the President? Do you recall?

A Yes. It was in the early evening of January 21st.
Q Early evening of January 21st?
A Yes.
Q The same day the story was reported?
A Yes.
Q Okay. So, from your point of view, this was something that needed to be addressed?
MR. McDaniel: Your Honor, I--Senator, I object to the question about "this" is something that needs to be addressed. I don’t understand what the "this" is, exactly, that the question refers to. Does it refer to the story?
Does it refer to the President’s statement to Mr. Blumenthal?
SENATOR SPECTER: Well, we think--Senator Edwards and I concur that the witness can answer the question. If he does not understand it, he can say so and then can have the question rephrased.
BY MR. GRAHAM:
Q You have a conversation with the President on the same day the article comes out, and the conversation includes a discussion about the relationship between him and Ms. Lewinsky. Is that correct?
A Yes.
Q Okay. So it was certainly on people’s minds, including the President, is that correct, the essence of this story?
MR. MCDANIEL: I object to the question about
whether it's on people's minds. I think he can answer about
what he knew or about what he learned from people who spoke
to him, but the question goes far beyond that.

BY MR. GRAHAM:

Q Well, let me ask you this. We know it was on the
President's mind.

SENATOR SPECTER: Senator Edwards and I think
that, technically, that's correct, and perhaps you can avoid
it by just pinpointing it just a little more.

MR. GRAHAM: Yes. We'll try to be laser-like in
these questions.

BY MR. GRAHAM:

Q You had a conversation with the President of the
United States about his relationship with Ms. Lewinsky on
the same day The Washington Post article came out. That's
correct? Yes or no?

A That--I--I--that's right.

Q Okay. During that period of time, that day or any
day thereafter, were you involved in any meeting with White
House lawyers or press people where the conversation--or
where the topic of Ms. Lewinsky's allegations or the--Ken
Starr's allegations about Ms. Lewinsky came up?

A I'm confused about which allegations you're
talking about.
Q That she had a relationship with the President, and they were trying to get her to file a false affidavit. Did that topic ever come up in your presence with the Press Secretary, White House press people or lawyers for the White House?

A I think the whole story was discussed by senior staff in the White House.

Q When did that begin to occur?

A I'm sure we were discussing it on January 21st.

Q Do you recall that everyone--

A Everyone--everyone in the country was talking about it.

Q Well, do you recall the tenor of that conversation? Do you recall the flavor of it? Can you describe it the best you can, about--was there a sense of alarm, shock? How would you describe it?

A I think we felt overwhelmed by the crisis atmosphere.

Q Did anybody ever suggest who is Monica Lewinsky, go find out about who she is and what she does?

A No.

Q So is it your testimony that this accusation comes out on January 21st, and the accusation being that a White House intern has an inappropriate relationship with the President, filed a false affidavit on his behalf, and nobody
at this meeting suggested let's find out who Monica Lewinsky
is and what's going on here?

A    Well, I wasn't referring to any meeting, but in
any of my discussions with members of the White House staff,
obody discussed Monica Lewinsky's personal life or decided
that we had to find out who she was.

Q    Could I turn you now to Tab 15, please? Okay.

MR. McDaniel: Would you like him to read this?

MR. Graham: Yes. Yes, please. Just take your
time. And I am now referring to an AP story by Karen
G-u-l-l-o. I don't want to mispronounce her name.

(Witness perusing document.)

THE WITNESS: I'm ready, Congressman.

BY MR. GRAHAM:

Q    Thank you.

And this article--do you know this reporter, by
any chance?

A    I do know this reporter, but I did not know this
reporter on January 30th.

Q    All right. Do you subsequently know--

A    Some months later, I met this reporter.

Q    And the basic essence of my question, Mr.

Blumenthal, will be this report indicates some derogatory
information about Ms. Lewinsky, and it also has some
statements by White House Press Secretary and Ms. Lewis.
And I want to ask how those two statements go together.

This report indicates that a White House aide called this reporter to suggest that Ms. Lewinsky’s past included weight problems, and she was called "The Stalker."

And it says that "Junior staff members, speaking on condition that they not be identified, said she was known as a flirt, wore her skirts too short, was "a little bit weird." And the next paragraph says: "Little by little, ever since the allegations of an affair between President Clinton and Ms. Lewinsky surfaced 10 days ago, White House sources have waged a behind-the-scenes campaign to portray her as an untrustworthy climber obsessed with the President."

Do you have any direct knowledge or indirect knowledge that such a campaign by White House aides or junior staff members ever existed?

A No.

Q Okay. Do you ever remember hearing Ms. Lewis or Mr. McCurry admonishing anyone in the White House about "watch what you say about Ms. Lewinsky"?

A No. I don't recall those incidents described in this article, but I do note that among senior advisors at one of the meetings that we held--it could have been in the morning or late afternoon--we felt very firmly that nobody should ever be a source to a reporter about a story about
Monica Lewinsky's personal life, and I strongly agreed with that and that's what we decided.

Q When did that meeting occur?
A I'd say within a week of the story breaking.

Q Who was at that meeting?
A I don't recall exactly, but I would say that the list of names that I mentioned before.

Q And that would be?
A I may not get them all, but I would say Chuck Ruff, Cheryl Mills, Bruce Lindsey, Lanny Breuer, Jim Kennedy, Mike McCurry, Joe Lockhart, Adam Goldberg, Don Goldberg, Ann Lewis, Paul Begala, Rahm Emanuel, myself.

Q And this occurred about a week after the January 21st article?

A I don't recall the exact date.

Q At least 7 days?
A Within a week--

Q Okay.
A --I believe.

Q Would it be fair to say that you were sitting there during this conversation and that you had previously been told by the President that he was in essence a victim of Ms. Lewinsky's sexual demands, and you said nothing to anyone?

MR. MCDANIEL: Is the question, "You said"--
THE WITNESS: I don't--

MR. McDANIEL: Is the question, "You said nothing to anyone about what the President told you"?

MR. GRAHAM: Right.

THE WITNESS: I never told any of my colleagues about what the President told me.

BY MR. GRAHAM:

Q And this is after the President recants his story--recounts his story--to you, where he's visibly upset, feels like he's a victim, that he associates himself with a character who's being lied about, and you at no time suggested to your colleagues that there is something going on here with the President and Ms. Lewinsky you need to know about. Is that your testimony?

A I never mentioned my conversation. I regarded that conversation as a private conversation in confidence, and I didn't mention it to my colleagues. I didn't mention it to my friends, I didn't mention it to my family, besides my wife.

Q Did you mention it to any White House lawyers?

A I mentioned it many months later to Lanny Breuer in preparation for one of my grand jury appearances, when I knew I would be questioned about it. And I certainly never mentioned it to any reporter.

Q Do you know how, over a period of weeks, stories
about Ms. Lewinsky being called a stalker, a fantasizer, obsessed with the President, called the name "Elvira"—do you know how that got into the press?

A   Which—-which—-which question are you asking me?
Which part of that?

Q   Okay. Do you have any idea how White House sources are associated with statements such as "She's known as 'Elvira'," "She's obsessed with the President," "She's known as a flirt," "She's the product of a troubled home, divorced parents," "She's known as 'The Stalker'"? Do you have any idea how that got in the press?

MR. BREUER: I'm going to object. The document speaks for itself, but it's not clear that the terms that Mr. Lindsey has used are necessarily—-any or all of them—are from a White House source. I object to the form and the characterization of the question.

MR. GRAHAM: The ones that I have indicated are associated with the White House as being the source of those statements and--

SENATOR SPECTER: Senator Edwards and I think that question is appropriate, and the objection is overruled.

WRN WITNESS: I have no idea how anything came to be attributed to a White House source.

BY MR. GRAHAM:

Q   Do you know a Mr. Terry Lenzner?
A I--I met him once.
Q When did you meet him?
A I met him outside the grand jury room.
Q And who is he?
A He's a private investigator.
Q And who does he work for?
A He works for many clients, including the President.
Q Okay. Mr. Blumenthal, I appreciate your candor here.
Do you know Mr. Harry Evans?
A Harold Evans?
Q Yes, sir.
A Yes. I do.
Q Who is Mr. Harold Evans?
A Harold Evans is--I don't know his exact title right now. He works for Mort Zuckerman, involving his publications, and he's the husband of my former editor, Tina Brown.
Q Has he ever worked for the New York Daily News?
MR. BREUER: I'm going to object to this line of questioning. It seems well beyond the scope of this deposition. I have never heard of Mr. Harold Evans, and it's not clear to me that's anywhere in this voluminous record or any of these issues.
SENATOR SPECTER: Senator Edwards and I think it would be appropriate to have an offer of proof on this, Congressman Graham.

MR. GRAHAM: I'm going to ask Mr. Blumenthal if he has ever at any time passed on to Mr. Evans or anyone else raw notes, notes, work products from a Mr. Terry Lenzner about subjects of White House investigations to members of the press, to include Ms. Lewinsky.

SENATOR SPECTER: Relating to Monica Lewinsky?

MR. GRAHAM: Yes, and anyone else.

MR. McDANIEL: That's a good question. I think we don't have any objection to that question.

SENATOR SPECTER: Well, we still have to rule on it. Overruled. The objection is overruled.

MR. GRAHAM: All right. Now I think I know the answer.

[Laughter.]

BY MR. GRAHAM:

Q So let's phrase it very clearly for the record here. You know Mr. Evans; correct?

A I do.

Q Have you at any time received any notes, work product from a Mr. Terry Lenzner about anybody?

A No.

Q Okay. So, therefore, you had nothing to pass on?
A Right.

Q Fair enough. Do you know a Mr. Gene Lyons?

A Yes, I do.

Q Who is Mr. Gene Lyons?

A He is a columnist for the Arkansas Democrat Gazette.

Q Are you familiar with his appearance on "Meet the Press" where he suggests in an article he wrote later that maybe the President is a victim similar to David Letterman in terms of somebody following him around, obsessed with him?

A Is this one of the exhibits?

Q Yes, sir.

A I wonder if you could refer me to it.

Q Sure. I can't read my writing. [Pause:]

BY MR. GRAHAM:

Q Well, while we are looking for the exhibit, let me ask you this. Do you have any independent knowledge of him making such a statement?

A Well, I'd like to see the exhibit so--

Q Okay.

A --so I could know exactly what he said.

Q Okay.

MR. McDANIEL: If I might--Congressman, I don't
know whether the one you're thinking of is—I note in Exhibit 20, there are—well, it's not a story by Mr. Lyons--

MR. GRAHAM: And that's it.

MR. McDaniel: There are references to him in—in that story.

MR. GRAHAM: That's it. Thank you very much.

MR. McDaniel: You're welcome.

MR. GRAHAM: I appreciate it.

THE WITNESS: This is 20?

BY MR. GRAHAM:

Q Yes, sir.

A Thank you.

Q Do you mind if I just read through it?

A Yes, sir. Take your time.

Q Thank you. [Witness perusing document.] I've read this.

Q My question is that this article is a Boston Globe article, Saturday, February the 21st, and it references an appearance on "Meet the Press" by Mr. Gene Lyons. And I believe you know who Mr. Gene Lyons is; is that correct?

A I do.

Q Did you know who he was in January of 1998?

A I did.

Q And in this press appearance, it refers to it being the Sunday before the Saturday, February 21st,
sometime in the middle of February.

He indicates on the show, at least this article recounts that he indicates, that the President could be in fact in "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."

Do you know how Mr. Lyons would come to that conclusion? I know word travels fast, but how would he know that? Do you have any independent knowledge of how he would know that?

A   What exactly is the question?

Q   Well, the question is Mr. Lyons is indicating in the middle of February that the truth of the matter may very well be that the President is in an "innocent relationship in which the President was, in a sense, the victim of someone, rather like the woman who followed David Letterman around," and the question is that scenario of the President being a victim of someone obsessed seems rather like the conversation you had with the President on January the 21st. Do you know how Mr. Lyons would have had that take on things?

MR. McDaniel: Well, I object to a question that sort of load up premises, Senators. That question sort of, you know, says, well, this conversation is a lot like the one you had with the President, and then asks the question.
And the danger to the witness is that he'll—by answering
the question accepts the premise.

And I ask that if you want to ask him whether it's
like the conversation with the President, that's a fair
question, he'll answer it, but it ought to be broken out of
there.

[Senators Specter and Edwards conferring.]

SENATOR SPECTER: Senator Edwards and I disagree
on the ruling, so we're going to take Senator Edwards and
ask you to rephrase the question since it—

[Laughter.]

MR. GRAHAM: Fair enough.

BY MR. GRAHAM:

Q The characterization embodied here indicates this
could be a totally innocent relationship in which the
President was in a sense the victim of someone. Is it fair
to say, Mr. Blumenthal, that is very much like the scenario
the President painted to you when you talked with him on
January the 21st?

A It could be like that.

Q Okay. And it goes on further: "rather like the
woman who followed David Letterman around." Is that very
much like the characterization the President indicated to
you between him and Ms. Lewinsky?

A Could be.
Q    Did you ever at any time talk with Mr. Gene Lyons about Ms. Lewinsky or any other person that was the subject of a relationship with the President?
A    I did talk to Gene Lyons about Monica Lewinsky.
Q    Could you tell us what you told him?
A    He asked me my views, and I told him, in no uncertain terms, that I wouldn't talk about her personally. I talked about Monica Lewinsky with all sorts of people, my mother, my friends, about what was in the news stories every day, just like everyone else, but when it came to talking about her personally, I drew a line.

Q    So, when you talk to your mother and your friends and Mr. Lyons about Ms. Lewinsky, are you telling us that you have these conversations, and you know what the President has told you and you're not tempted to tell somebody the President is a victim of this lady, out of his own mouth?
A    Not only am I not tempted, I did not.
Q    You don't know how all this information came out? You have no knowledge of it at all?

MR. McDaniel: I don't understand the question about--

MR. GRAHAM: About her being a stalker, her being obsessed with the President, the President being like David Letterman in relationship to her.
BY MR. GRAHAM:

Q You had no knowledge of how that all happened in
the press?

A I have an idea how it started in the press.

Q Well, please share that with us.

A I believe it started on January 21st with the
publication of an article in Newsweek by Michael Isikoff
that was posted on the World Wide Web and faxed around to
everyone in the news media, in Washington, New York,
everywhere, and in the White House. And in that article,
Michael Isikoff reported the contents of what became known
as the talking points.

And there was a mystery at the time about who
wrote the talking points. We know subsequently that Monica
Lewinsky wrote the talking points. And in that document,
the author of the talking points advises Linda Tripp that
she might refer to someone who was stalking the "P", meaning
the President, and after that story appeared, I believe
there were a flood of stories and discussions about this,
starting on "Nightline" that very night and "Nightline" the
next night and so on. And that's my understanding from
observing the media of how this started.

Q How long have you been involved in the media
yourself?

A Before I joined the White House staff, I was a
Is it your testimony that the Isikoff article on
the 31st explains how White House sources contact reporters
in late January and mid-February trying to explain that the
President is a victim of a stalker, an obsessed young lady,
who is the product of a broken home? Is that your
testimony?

A No.

MR. BREUER: I'm going to object to the form of
the question. There is no evidence that White House
officials, both in January and in February, if at any time,
contacted sources, press sources.

MR. GRAHAM: I will introduce these articles. The
articles are dated with White House sources, unsolicited,
calling about this event, saying these things in January and
February.

MR. BREUER: Well--

SENATOR SPECTER: Senator Edwards and I agree that
the question may be asked and answered. Overruled.

THE WITNESS: If you could restate it, please?

BY MR. GRAHAM:

Q Is it your testimony that the White House sources
that are being referred to by the press are a result of the
31st of January Isikoff article? That's not what you're
saying, is it?
A No.

MR. MCDANIEL: Well--

MR. GRAHAM: Thank you.

MR. MCDANIEL: --I don't think that there ought to be argument with Mr. Blumenthal. I think he ought to be asked a question and given an opportunity to answer it, and that's an argumentative question and followed up by, "That's not what you're saying, is it?"

I also think the questions are remarkably imprecise, in that they do not specify what information it is this questioner is seeking to get Mr. Blumenthal to talk about, and in that regard, I think the questions are both irrelevant and unfair.

SENATOR EDWARDS: Are you objecting to a question that's already been asked and answered?

MR. MCDANIEL: I might be, Senator, and I had that feeling when I heard Mr. Blumenthal say something, that I might be doing that.

MR. GRAHAM: That would be my reply. He understood what I asked, and he answered, and I'll accept his answer and we'll move on.

SENATOR SPECTER: Well, I think the objection is mooted at this point.

MR. GRAHAM: Okay.

SENATOR SPECTER: I do--I do think that to the
extent you can be more precise, because these articles do
contain--

MR. GRAHAM: Yes, sir.

SENATOR SPECTER: --a lot of information. We're
still looking for that laser.

MR. GRAHAM: Yes, sir.

BY MR. GRAHAM:

Q And these--and the reason this comes up, Mr.
Isikoff--excuse me--Mr. Blumenthal, is you've referenced the
Isikoff article on the 21st, and my question goes to White
House sources indicating that Ms. Lewinsky is a stalker, the
January 30th article, that she's obsessed with the
President, that she wears tight skirts.

What I'm trying to say is that you--you are not
saying--it is not your testimony--that those White House
sources are picking up on the 21st article, are you?

A I don't know about any White House sources on
these stories.

Q When you talked to Mr. Lyons, you never mentioned
what time at all that Ms. Lewinsky was making demands on the
President and he had to rebuff her?

A Absolutely not.

Q You never at one time told Mr. Lyons or anyone
else that the President felt like that he was a victim much
like the person in the novel, Darkness at Noon?
MR. MCDANIEL: Well, I object to that question.

This witness has testified that he told his wife and that he
told White House counsel at a later date, and the question
included anyone else. So I think it--

MR. GRAHAM: Yes. Strike that.

BY MR. GRAHAM:

Q Excluding those two people?

A Well, I believe I've asked-- I've been asked, and

answered that, and I haven't told anyone else.

Q Was there--

A I didn't tell anyone else.

Q Was there ever an investigation at the White House

about how these stories came out, supposedly?

A No.

Q Was anybody ever fired?

A No.

MR. GRAHAM: Thank you, Mr. Blumenthal.

THE WITNESS: I thank you.

MR. ROGAN: No further questions.

MR. BRUER: Could we take a 5-minute break,

Senator?

SENATOR SPECTER: We can. We will recess for 5

minutes.

THE VIDEOGRAPHER: We are going off the record at

11:24 a.m.
THE VIDEOGRAPHER: We're going on the record at 11:40 a.m.

SENATOR SPECTER: Turn to White House counsel, Mr. Lanny Breuer.

MR. BREUER: Senators, the White House has no questions for Mr. Blumenthal.

SENATOR SPECTER: We had deferred one line of questions which had been subject objection and considerable conference, and we put it at the end of the transcript so it could be excised. Do you wish to--

MR. GRAHAM: Yes.

SENATOR SPECTER: --proceed further?

MR. BREUER: May we approach off the record.

[Discussions off the record.]

THE VIDEOGRAPHER: We are going back on the record at 12:10 p.m.

SENATOR SPECTER: The Senators have considered the matter, and in light of the references, albeit abbreviated, in the record and the generalization that answers--questions and answers would be permitted, reserving the final judgment.
to the full Senate, we will permit Congressman Graham to
question on pattern and practice with respect to Ms. Willey.

MR. GRAHAM: Okay. Thank you.

FURTHER EXAMINATION BY HOUSE MANAGERS

BY MR. GRAHAM:

Q Mr. Blumenthal, we're really close to the end
here. If you could turn to Tab 5, page 193.

A We have it.

Q Okay, thank you.

And page 20, the last question, it's in the
right-hand corner. I'll read the question, and we'll kind
of follow the testimony. "Have you ever had a discussion
with people in the White House or been present during any
meeting where the allegation has come up that other women
are fabricating an affair with the President?"

Now, could you read the answer for me, please?

A Sure. My--my answer in the grand jury is this:
"We've discussed news stories that arose out of the Jones
case, which was dismissed by the judge as having no basis,
in which there were allegations made against the President,
and these were stories that were in the press."

Q "And you--" "And did you discuss those with the
President?"

You said, "No."

And the next question is: "So what form did you
discuss those news stories in?"
A "In strategy meetings."
Q Okay. "And that would include the daily meetings, the morning and the evening meetings?"
A Yes.
Q And your answer was "Yes."

Now, within that context, I want to walk through a bit how those strategy meetings came about and the purpose of the strategy meetings.

The next question goes as follows: "And there were names of the women that you discussed in that context that there had been news stories about and public allegations of an affair with the President?"
A "As I recall, we discussed Paula Jones, Kathleen Willey, we’ve discussed"--and the rest is redacted.
Q Redacted--and that’s fine, that’s fine.
And the question later on, on line 24: "When you say that that was a complete and utter fraudulent allegation--", the answer is: "In my view, yes." Right?
A Well--
Q About a woman?

MR. Mc DANIEL: Senator, I must object to this, because I believe that question, clearly from the context,
refers to redacted material--

MR. GRAHAM: Right.

MR. MCDANIEL: --which has been preserved as
secret by the grand jury, and I think it's somewhat
misleading to talk about a fraudulent allegation that the
grand jury heard that Mr. Blumenthal testified about, which
is clearly not in the record before the Senate.

SENATOR SPECTER: Well, it is unclear on the face
of the record. So, Congressman Graham, if you could--

MR. GRAHAM: The point I'm trying--

SENATOR SPECTER: --excuse me, let me just finish-

MR. GRAHAM: Yes.

SENATOR SPECTER: --if you could specify on what
is on the record that you've put in up to now.

MR. GRAHAM: Okay. What I'm reading from,

Senator, is--is a question and answer and a redacted name,
and the point I'm trying to make is ever who that person
was, the allegation was considered to be fraudulent based on
your prior testimony.

THE WITNESS: That was--that was my testimony,
that it was my view.

BY MR. GRAHAM:

Q And that leads to this question. Was there ever a
discussion in these strategy meetings where there was an
admission that the allegation was believed to be true
against the President in terms of relationship with other
women?

MR. BREWER: I'm going to object to the form of
the question in that it's referring to other women. Even
based on the discussion that went off the record, I think
that what Mr. Graham is doing now is certainly beyond any
record in this case.

SENATOR SPECTER: Senator Edwards would like to
hear the question repeated.

MR. GRAHAM: The strategy meetings--

SENATOR SPECTER: Good idea?

MR. GRAHAM: Yes, sir.

BY MR. GRAHAM:

Q The strategy meetings involved press accounts of
allegations between the President and other women. The
question is very simple. At any of those meetings, was it
ever conceded that the President did have in fact a
relationship?

MR. BREWER: Object. I object to the question for
the reasons I just previously stated.

SENATOR SPECTER: Senator Edwards raises the
concern that I think he's correct on, that we have limited
it to Willey, Ms. Willey. So, if you would—if you would
focus--
MR. GRAHAM: Absolutely.

SENATOR SPECTER: --there--

MR. GRAHAM: Absolutely.

SENATOR SPECTER: --it would be within your
proffer and what we have permitted.

MR. GRAHAM: Yes, sir. Very well.

BY MR. GRAHAM:

Q In regards to Ms. Willey, is it fair to say that
the consensus of the group was that these allegations were
not true?

A I don't know.

Q Do you recall Ms. Willey giving a "60 Minutes"
interview?

A Yes.

Q Do you recall any discussions after the interview
at a strategy meeting about Ms. Willey?

MR. BREWER: I want the record to be clear that
the White House has a continuing objection as to this line
of inquiry.

SENATOR SPECTER: The record will so note.

THE WITNESS: If you could repeat the question,
please.

MR. GRAHAM: Yes.

THE WITNESS: Sorry.

BY MR. GRAHAM:
Q. After the "60 Minutes" interview, was there ever a strategy meeting about what she said?

A. At one of the morning or evening meetings, we discussed the "60 Minutes" interview.

Q. And can you--I--I know it's hard because these meetings go on a lot. How--do you know who was there on that occasion, who would be the players that would be there?

A. They would be the same as before. I'd be happy to enumerate them for you, if you want me to.

Q. But the same as you previously testified to?

A. Yes.

Q. Okay, that's fine.

Do you recall what the discussions were about in terms of how to respond to the "60 Minutes" story?

A. Yes.

Q. Could you tell us?

A. They were what our official spokes-people would say.

Q. Did they include anything else?

A. Yes.

Q. Could you please tell us?

A. There was a considerable complaining about how, in the "60 Minutes" broadcast, Bob Bennett was not given adequate time to speak and present his case, and how he was, as I recall, poorly lighted.
Q: Was there any discussion about what Ms. Willey said herself and how that should be responded to?

A: I don't recall exactly. We just spoke about what our official spokespeople should respond to.

Q: Did anybody ever discuss the fact that Ms. Willey may have had a checkered past?

A: No, absolutely not. We never discussed the personal lives of any woman in those meetings.

Q: Did it ever come up as to, well, here's what we know about Kathleen Willey and the President, or let's go see what we can find out about Kathleen Willey and the President?

A: No.

Q: Who had the letters that Kathleen Willey wrote to the President?

A: I don't know exactly. The White House had them.

Q: Isn't it fair to say that somebody found those letters, kept those letters, and was ready to respond with those letters, if needed to be?

MR. BREUER: I'm going to object to the form of the question that it's outside the proffer of the Manager. [Senators Specter and Edwards conferring.]

MR. McDaniel: Yes. I object to the compound nature of the question, and--

SENATOR SPECTER: Could you rephrase the question,
Congressman Lindsey--

MR. GRAHAM: Yes, sir.

SENATOR SPECTER: --or, Graham?

MR. GRAHAM: Yes, sir.

SENATOR SPECTER: I think that would solve your problem.

BY MR. GRAHAM:

Q. There were letters written to Ms. Willey to the President that were released to the media. Is that correct?

A. Yes.

Q. Do you know who gathered those letters up and how they were gathered up?

MR. BREUER: Objection.

SENATOR SPECTER: Senator Edwards and I agree that the Congressman may ask the question. Overruled.

THE WITNESS: No.

BY MR. GRAHAM:

Q. Would it be fair to say, using common sense, that somebody was planning to answer Ms. Willey by having those letters to offer to the press?

MR. BREUER: Objection.

MR. MCDANIEL: It's argumentative.

MR. BREUER: It certainly is.

SENATOR SPECTER: Would you repeat that question?

BY MR. GRAHAM:
Q The question is: Mr. Blumenthal, do you believe it's a fair assumption to make that somebody in the White House made a conscious effort to go seek out the letters between the President and Ms. Willey and use in response to her allegations?

[Senators Specter and Edwards conferring.]

THE WITNESS: Well, that's an opin--

MS. MARSH: Wait, wait, wait.

MR. MCDANIEL: Please, Mr. Blumenthal.

THE WITNESS: Yes.

SENATOR SPECTER: Senator Edwards says, and I agree with him, that you ought to direct it to somebody with specific knowledge so you don't--

BY MR. GRAHAM:

Q Do you have any knowledge--

SENATOR SPECTER: --deal totally with speculation.

BY MR. GRAHAM:

Q Do you have any specific knowledge of that event occurring, somebody gathering the letters up, having them ready to be able to respond to Ms. Willey if she ever said anything?

A No.

Q You have no knowledge whatsoever of how those letters came into the possession of the White House to be released to the press?
A No, I don't. I don't know--
MR. GRAHAM: Thank you. I--
THE WITNESS: --who had them--
MR. GRAHAM: --don't have any--
THE WITNESS: --in the White House.
MR. GRAHAM: --further questions.
SENATOR SPECTER: White House counsel, Mr. Breuer?
MR. BREUER: Senators, the only thing I would do
at this point is introduce just for--to keep the record as
complete as we can, given Mr. Graham's two references to
articles introduced, a White House exhibit that contains the
January 21, 1998, Isikoff story in Newsweek; the January 21,
1998, ABC "Nightline" transcript; the January 22, 1998, ABC
"Nightline" news transcript; the January 29, 1998,
Washington Post article; the February 2, 1998, Washington
Times article; the July 29, 1998, Washington Times article;
and the August 8, 1998, L.A. Times article, just to have a
complete record with respect to news stories.

The Managers have seen these articles previously,

Senators.

SENATOR SPECTER: Any objection?
MR. GRAHAM: Not at all, and let's just make sure
that the articles I have referenced are into the record--Tab
15, the Associated Press article of January--

SENATOR SPECTER: We'll rule first on the offer by
the White House counsel. Without objection, they will be
admitted to the record.

[White House Exhibit Nos. S.B.
1 through S.B. 7 marked and
received in evidence.]

SENATOR SPECTER: Any objection to Congressman
Graham's offer, Mr. Breuer?

MR. BREUER: No. With respect to Tab 15, none at
all.

MR. GRAHAM: Tab 20?

MR. BREUER: No. That--no objection.

SENATOR SPECTER: Tabs 15 and 20 will be admitted.

[Tab Nos. 15 and 20 received
in evidence.]

MR. GRAHAM: Tab 11?

MR. BREUER: We object to Tab 11. There is
no--there's been no questions about Tab 11.

SENATOR SPECTER: Are you pressing Tab 11--in
which event, we'll take a look at it.

MR. GRAHAM: Well, I would--I haven't asked any
questions about theirs, so I'm just trying to have a balance
here. Yes, Tab 11, I would like to be entered into the
record.

SENATOR SPECTER: Well, we'll take a look at it
and make a ruling.
MR. GRAHAM: Okay. And in that regard, Tab 10.

[Senators Specter and Edwards conferring.]

MR. GRAHAM: I'll tell you what—why don't we make this easy. I understand what you're saying. Let's substitute 9 for 10.

SENATOR SPECTER: Well, you were on 11, weren't you?

MR. GRAHAM: Well, yes, sir. I'm pressing 11, and I'll—I'll take 9 for 10.

SENATOR SPECTER: Well, we've already admitted 10. [Tab No. 10 received in evidence.]

SENATOR SPECTER: Do you have an objection, Mr. Breuer, to 9?

MR. BREUER: In principle, Senator, it's my view that Mr. Graham has now been given ample opportunity to ask questions. Whatever articles he questioned Mr. Blumenthal about, I think should be in the record, and all the rest of the articles that he chose not to question Mr. Blumenthal about, I believe should not be in the record. That is really my principal position, and I think, candidly, Senators, it's a very fair one.

[Senators Specter and Edwards conferring.]

MR. GRAHAM: Yes, that's my--I'm assuming they are, John. That's why I didn't make a big deal about going
through each one of them—and if that’s my mistake, I’m
sorry, but I assumed that the whole time.

MR. GRIFFITH: Are they part of the Senate record?

MR. GRAHAM: I don’t want to make a statement
about that and just make it up. I don’t know.

SENATOR SPECTER: Well, I think this is less than
much ado about nothing, but, Congressman Graham, why do you
think they are important to your case, and then we will hear
from Mr. Breuer about why he is objecting to them.

MR. GRAHAM: I think these articles go along the
line of questioning about the events concerning—

SENATOR SPECTER: So that you’ve spared us the
travail of having questions?

MR. GRAHAM: In all honesty, Senator, I want to
get this thing over as much as you all do, and I could go
through every article if I need to, but it is a continuation
of the questioning that I inquired of the witness, and I
think it reflects—

SENATOR SPECTER: And, Mr. Breuer, are you
contending—

MR. GRAHAM: --that record.

SENATOR SPECTER: --that the admission of these
couple of newspaper stories would be prejudicial to your
client?

MR. BREUER: No, I don’t think they’d be
prejudicial at all, Senator. I simply believe—and I will
defy the ruling of the Senators—I simply believe that
if Mr. Graham didn’t inquire about them, they ought not to
be in the record. And indeed, I questioned, without going
off the record—I indeed tried to find out the evidentiary
rules of this proceeding prior to this coming, before us
doing this here, and that was my understanding, that if Mr.
Graham did indeed did not question about an article or seek
to introduce it in his case, it wouldn’t be introduced.

SENATOR SPECTER: Mr. Breuer, didn’t you offer and
we admitted into evidence many stories which had not been
the subject of questions?

MR. BREUER: I did, but I did that—I began to do
that in my case, in my—I wanted to do that in my
presentation, but, Senator, I will defer. I don’t think
that these articles hurt the President at all, and if for
purposes of a complete record, the Senator—

SENATOR SPECTER: Well, that’s a generous
conciliation statement, and my instinct would be to put them
in, since they have so little weight one way or another.

MR. BREUER: Okay.

SENATOR EDWARDS: I agree.

MR. BREUER: Before—

SENATOR SPECTER: Senator Edwards and I agree they
should be admitted into evidence.
MR. BREUER: More importantly, though, may we take another 5-minute break before the White House decides whether it--

SENATOR SPECTER: Yes, you may. We'll take another 5-minute break.

THE VIDEOGRAPHER: This marks the end of Videotape Number 1 in the deposition of Sidney Blumenthal. We're going off the record at 12:28 p.m.

[Recess.]

THE VIDEOGRAPHER: We're continuing with Videotape Number 1 in the deposition of Sidney Blumenthal. The time is 12:34 p.m.

SENATOR SPECTER: Mr. Breuer, you may proceed.

MR. BREUER: Senator--Senators, the White House has no questions for Mr. Blumenthal.

Thank you, Mr. Blumenthal.

THE WITNESS: Thank you.

SENATOR SPECTER: Well, I believe that concludes the proceeding. Thank you very much, Mr. Blumenthal, for being here to testify. I thank counsel for Mr. Blumenthal.

MR. Mc DANIEL: Thank you, Senator.

THE WITNESS: Thank you, Senator. Thank you.

SENATOR SPECTER: Thank counsel, all.
And that concludes our proceeding.

THE VIDEOGRAPHER: This concludes the deposition of Sidney Blumenthal.

We're going off the record at 12:35 p.m. The number of tapes used is one.

[Whereupon, at 12:35 p.m., the deposition was 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.

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CATHY JARDIM
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
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.

TABULAR OR GRAPHIC MATERIAL SET FORTH IN THIS DOCUMENT IS NOT DISPLAYABLE.

PHOTO: Caption: Lewinsky

-- INDEX REFERENCES --

KEY WORDS: U.S. PRESIDENT; SCANDALS; RELATIONSHIPS; SEXUAL BEHAVIOR; INVESTIGATIONS

STORY ORIGIN: WASHINGTON

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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 flustered. 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.
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 worked 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 $20,600. She was making $18,736 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
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."

Word Count: 697
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, over 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 arm," 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"
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, when 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.
Another reason to keep quiet is a fear that criticizing 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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CLINTON'S THE VICTIM OF LEWINSKY? NOW, THAT'S A STRETCH

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 him 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..."
2/21/98 BOSTON All

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 smear 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 nuzzling 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 fell deluded to long-running, highly detailed fantasies in which they are obliged to perform hurried, loveless acts of sexual service upon his Alpha-ship 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 house, 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 apparatuses 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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Editor's Note: Newsweek posted the following online exclusive on its America Online page. Newsweek Interactive, an online addition.

Last weekend, there were two extraordinary dramas playing out in Washington. On Saturday, as 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.

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 saying 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.
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 disturbed 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 1991. 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 "vaces 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 as 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 nextstands 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
lawyers, whom she feared were too close to the White House. 

Angry, she left her lawyer's office and called the office of 

White House 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 1993 shortly after graduating 

from Lewis and Clark College in Oregon. In December 1993, 

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 1993, 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 smudged 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 revealing 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 funneling 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
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 be” and “the creep,” but it is obvious from the tape that she is referring to Clinton. She wonders 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. And—just—do you ever [by telling others about the affair, now you have this information, do whatever you want with it].” Lisa 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, “We 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—I’m going to 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 flirtation 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 [Hemsach, 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 Schmacko, 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 three 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 him 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, Feb. 21,
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 Revice, confirmed that they offered Lewinsky a public relations job this month after she was referred to the company by Jordan, a member of Revice's board of directors.) The incriminating tape gave Starr's deputies hope that they could "flip" Lewinsky and make 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.
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' 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' 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, unzipped 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' 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 F 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 obstruction 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 appeal court panel that supervises the independent counsel gave its blessing. 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.
Monday, January 19. Negotiations between Starr's staff and her attorneys broke down. On Monday morning, Lewinsky's name surfaced in the Dodge Report, a widely read but somewhat unreliable gossip column on the Internet. Dodge 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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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.

Pres. Bill Clinton: I can tell you I did not do that.
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 midnight 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 intern, 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 lawyer’s 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,
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Levinson "can be heard weeping and clearly indicating 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 19th, 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 34-year-old secretary would draft.

This is Jackie Judd for Nightline in Washington.

JOE KOPPEL: Clearly, the White House itself is taking the potential impact of all these new 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 wire and on the air. McCurry was later to confirm that three lawyers had worked on that statement. In an attempt to muffle this bomb blast, every word is critical.

GEORGE STEPHANOPOULOS, ABC News Analyst, Former Clinton Advisor: 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 in the next room up.
"OBERT 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?

BOB 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.

BOB 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 DOWNAN: (voice-over) By now, reporters are taking a closer look at the McCurry statement and they're seeing problems with it.

LAURENCE McQUEELEN, 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 DOWNAN: (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 GRIN, "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 DOWNAN: 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 advisors. 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 today. 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
different ways to get me to amplify on this statement. I'm clearly not going to do it.

JOHN DOVAN: But the White House message was to be honored 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 new organizations about his State of the Union address next week. Cancelling the interviews was not an option because doing so would leave the impression that Mr. Clinton is hiding something.

JIM LEHNER: Mr. President, welcome.

JOHN DOVAN: (voice-over) So they go forward. 3:15 P.M., the president is asked by Jim Lehrer of Public Broadcasting to clarify.

JIM LEHNER, 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 DOVAN: (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 LEHNER: You had no sexual relationship with this young woman?

Pres. BILL CLINTON: There is not a sexual relationship. That is accurate.

JOHN DOVAN: (voice-over) 4:26 P.M., Mr. Clinton talks by telephone with Martin Cendron. (ph) from the biweekly Roll Call. This time as the tape is played back, Mr. Clinton sounds more specific.

MARTIN CENDRON: 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 DOVAN: (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 DOVAN: (voice-over) The work of the country.

Pres. BILL CLINTON: The first lady of the United States.

JOHN DOVAN: (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 House. His staff says this scandal will not distract Mr. Clinton. At one point 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 Doan 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 sent 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 MARGERIS: 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 things 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 NIEN: 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 haled Jordan before a grand jury because of allegations he helped steer lucrative legal work to Webster Hrubshy (ph) in an effort to buy his silence in the Whitewater investigation. Hrubshy 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
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Street Journal doubts Jordan would ask anyone to lie under oath.

CHRIS BURY: (voice-over) In fact, ABC has learned Jordan did try to get Monica Lewinsky a $60,000 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 $60,000 for legal work in 1994 after he left the Justice Department. Nightline has also learned U.S. 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 that 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 egotism 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 KOPFEL: 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 tape, his client is being victimized.

Mr. Ginsberg, you made a particularly delightful comment this morning suggesting that if one set of circumstances are true then the president is a nazi and 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 KOPFEL: 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 KOPFEL: 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 KOPFEL: Oh, so in other words it was at his recommendation that she went to this lawyer?

WILLIAM GINSBERG: His suggestion.

TED KOPFEL: His suggestion. And at whose suggestion was it that she go to Vernon Jordan?

WILLIAM GINSBERG: I don't know.

TED KOPFEL: 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 as 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 notions and techniques in order to find out what the GIC has, doesn't have and to see what they want to do and what we can do with them in some form.

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 Counsel, 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, wouldn'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 bullied 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 furnishings 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 tape alleging a possible 
handicapping of justice, possible perjury in the Oval Office and then to be able 
and 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 
return, 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 twenty-something intern in a position to define the Clinton legacy.

4th TALK SHOW HOST: The Clinton presidency will be characterized and his legacy 
will be sealed.

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 "out." However, and unfortunately he provided the ammunition to his enemies. I think there is a parallel here.

MICHELE 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. W. 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.

MICHELE 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 Lindsey 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.

MICHELE 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.

MICHELE 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, 43 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 74 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
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their share of crisis meetings at advisers to the president in the Clinton White
house. David Gergen joins us here in Washington. George Stephanopoulos is in
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 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
to be like that because you have a conflict between the lawyers on the one hand
who are thinking about legal proceedings and court action 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 we're dealing with legal judgments is
any inconsistency 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 this kind of
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, 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 court 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 -
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TED KOPPEL: George, I need to tap into your personal 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 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, 60 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 Watergate days, and I wasn't one in those days and maybe not now, said no, no, it will pave out. You know, Ted, the old phrase, the mists 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
know 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.

At 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 KOOPPEL: 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 11:30 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 KOOPPEL: 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 McKeef and all the rest of the people.

TED KOOPPEL: 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 KOOPPEL: 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.
BLUMENTHAL DEPOSITION

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SHOW: WORLD NEWS TONIGHT WITH PETER JENNINGS (6:30 pm ET)

JANUARY 22, 1998

Transcript # 98011240-594

TYPE: PACKAGE

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LENGTH: 475 words

HEADLINE: THE NEXT STEP FOR MONICA LEWINSKY

LINE: 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

S.B. 3
ABC News learned today, that after Lewinsky was confronted at this hotel by investigators and told these 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 did come from a lawyer obviously concerned about limiting damage to President Clinton. Peter?

PETER JENNINGS: Thanks very much, Jackie Judd in Washington.

LANGUAGE: ENGLISH

LOAD-DATE: JANUARY 21, 1998
Aide's Interest in President Was Known to Friends

Byline: Amy Goldstein; William Clasehme, Washington Post Staff Writers

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 was given a badge that allowed her into the White House's restricted West Wing, one friend said, she'd told him that she looked 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, some of her co-workers, both while she worked at the White House and later when she was sent to the Pentagon.

These 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 normal 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 N. 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. Beiler, 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.
Then, too, there was the relationship Lewinsky had with a high-ranking 
vilian 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 Bliler -- have said in recent 
days that they often have discussed her stories of sexual trysts as mere 
fiction. Bliler 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 
Blilers 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 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 Ana Novales 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 
"margined in recent days almost entirely from her acquaintances -- and, in one 
instance, from the liberal arts college where, in 1991, 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.

Bliler, the drama teacher, said he believed the letter, reportedly written 
to provide the continuation of someone's state unemployment benefits, had been 
prepared on his behalf. Giles, his lawyer, added that the letter was composed 
without Bliler's knowledge.

After the Blilers 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 Blilers 
under oath.

The attorney declined to discuss specifics of the interviews but said the 
Blilers 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 Blilers 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

White House at a fairly high level,' but Giles said he also believes from last '92'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 Blitzer somehow discredits his client, Lewinsky's lawyer William J. 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 "demoted 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. Inevitably, the office's television was tuned 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 internship 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 Starbuck's, 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 writer's David Maraniss and Dana Priest contributed to this report. Claiborne reported from Portland.

...AP Photo, afp; Photo, lucian perkins; Photo, sp/joel maller;sp,sp/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 Cosmos 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
2527 BLUMENTHAL DEPOSITION

Thomas Jefferson may have done it. Andrew Jackson was accused of doing it. We know that Grover Cleveland and Warren Harding did it. So did it with maybe only one woman. Jack Kennedy did it with most of the women on the Atlantic deck.

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 Roberts, 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 chico then as now. Jackson married 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 neither nevertheless pushed their daughters at the bachelor presidency. He eventually married a very young woman who turned out to be a great asset as first lady.

Florence Harding visited Madame Xerxes, 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. Madame Xerxes 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 duddy 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-pig 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 boudoir adventures of his predecessors. Mr. Clinton arrived when all the rules had been changed.

WHITE HOUSE EXHIBIT
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It is a postmodern fact of life that the media sees almost nothing iffy 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 told 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 said his 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 commitment: "I can wish the women of our county 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.

Susanna Felds, a columnist for The Washington Times, is nationally syndicated. Her column appears here Monday and Thursday.

LANGUAGE: ENGLISH
LOAD-DATE: February 2, 1998
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.

Treasury Secretary Michael McCurry brushed aside queries about her agreement with independent counsel Kenneth W. Starr in an interview with the Washington Post about 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 despairing because of the latest turn in the 4-month-old Lewinsky scandal.

"Do I look under siege? This is her deal, not ours," said one aide.

"People are kind of lumped in this, we've been used to this. It's a roller coaster over here. Everyone assumed that this was going to happen just like everyone assumed 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 with his recent practice of aggressively challenging reporters. Instead employing heavy-handed and offering at the start of his daily briefing that the president was happy for Ms 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 said.

"I'm just pleased that things are working out for her," said Mr. McCurry.
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 Mr. 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
For years, whenever a woman surfaced with a story that threatened the man,
the Clinton team had the same response: Assume attack mode and assail her
credibility.

Monika 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
McFadden 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
taking 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.

McFadden 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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WHITE HOUSE
EXHIBIT
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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 Ralph Reemael, senior advisor
for policy and strategy.

The legal peril Lewinsky poses to the president is one factor in the kid
glove treatment, some Clinton advisors said. "I think anybody who tried to
impeach 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 too loyal to the president to be involved."-

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 gropped by the president in the White House, aides quickly
raised questions about her credibility. They produced a pile of correspondences
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 adviser, 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 advisers 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: ??

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. Sidney Blumenthal and I are social friends and journalistic acquaintances.


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
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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 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 conversation 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