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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription

2/9/98

On below date Investigating Agents interviewed JENNIFER M. PALMIERI. Also present was her attorney, RICHARD A. SAUBER. The interview was conducted in SAUBER's office at 1001 Pennsylvania Avenue, N.W., Washington D.C. 20004-2505. PALMIERI provided the following:

PALMIERI, date of birth November 15, 1966, place of birth Pascagoula, Mississippi, Social Security Account Number [REDACTED], graduated from American University in 1988. She currently resides at [REDACTED], home telephone [REDACTED], work telephone [REDACTED], White House pager [REDACTED].


PALMIERI has been employed at the White House since 1994. From 1994 through March 1997, she was the Special Assistant to the Chief of Staff, LEON PANETTA, and from March 1997 until present she has been the Deputy Director of the Scheduling Office.

PALMIERI advised that MONICA LEWINSKY was hired as an unpaid intern during the summer of 1995. LEWINSKY worked in the Chief of Staff's Correspondence Office in the Old Executive Office Building (EOB). PALMIERI had no role in hiring her. PALMIERI's office was in the West Wing next to LEON PANETTA's. PALMIERI would see LEWINSKY on occasion, as LEWINSKY at times would accompany TRACY BOBOWICK to the Chief of Staff's Office with mail. LEWINSKY would wear an orange pass as an escorted visitor.

LEWINSKY worked directly for PALMIERI for several days in November during the first government shut-down in 1995. PALMIERI, at this time, liked LEWINSKY and felt she was a good, competent, and careful worker. PALMIERI needed help answering phones. She would clear LEWINSKY into the West Wing, and LEWINSKY would be an escorted visitor. PALMIERI could not recall if she did, in fact, escort LEWINSKY during the work day. PALMIERI was shown WAVES records which indicated that she had cleared LEWINSKY in on November 15, 16, 17, and 18, 1995. PALMIERI agreed that those were the dates LEWINSKY worked with her.

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Investigation on 2/6/98 at Washington, D.C. File # 29D-OIC-LR-35063  
by SA [REDACTED]  
SA [REDACTED] Date dictated 2/6/98



29D-OIC-LR-35063

Continuation of OIC-302 of JENNIFER M. PALMIERI . On 2/6/98 . Page 2

PALMIERI advised that during the government shut-down the President came to the Chief of Staff's Office several times. The President had rarely visited this part of the West Wing prior to the shut-down. PALMIERI explained that the President "wandered" around the West Wing at this time because of the shut-down. During his visits to the Chief of Staff's Office, the President would speak with LEWINSKY. This was an exchange of pleasantries. PALMIERI advised that this was not unusual, as the President is friendly and says hello to everyone. PALMIERI stated that at this time she became concerned with LEWINSKY's behavior. LEWINSKY was giddy about being in the West Wing and about meeting the President. LEWINSKY was also like that with HAROLD ICKES, GEORGE STEPHANOPOULOS, and PANETTA. PALMIERI was concerned that LEWINSKY would say something embarrassing or in some way bother the President, but LEWINSKY never did, in PALMIERI's presence.

In December 1995, LEWINSKY moved to the Legislative Affairs Correspondence Office as a paid staff member in the East Wing. LEWINSKY had a blue pass at this time and was an unescorted visitor in the West Wing. At that point, PALMIERI would see LEWINSKY about once a week in the West Wing. They were not friends, and did not socialize.

PALMIERI stated that individuals at the White House were concerned with LEWINSKY hanging around the President too much. LEWINSKY had the reputation of being "clutchy." Senior staff members of the White House became worried that an affair between the President and LEWINSKY had begun. PALMIERI never saw an incident that lead her to believe this, and she never heard of one from another employee. However, this was the general speculation that an affair could be ongoing, and staffers were worried. PALMIERI recalls probably speaking with TIM KEATING, Legislative Affairs; SUSAN BROPHY, Legislative Affairs (now in Lisbon, Portugal); and EVELYN LIEBERMAN about this. This group wondered if there was actually an affair or just rumor. PALMIERI may have discussed this topic with HAROLD ICKES and LEON PANETTA as well.

After LEWINSKY was moved to the Pentagon, there was relief among the senior staffers that she was gone. People at the White House were generally happy she had moved as they viewed her as a problem. PALMIERI did not know who had moved LEWINSKY.

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Continuation of OIC-302 of JENNIFER M. PALMIERI, On 2/6/98, Page 3

PALMIERI saw LEWINSKY at the White House three more times after she went to the Pentagon. First she saw LEWINSKY on November 6, 1996, at the South Lawn event after the 1996 Presidential Election. Then once in the West Wing Basement, and once in the West Wing Lobby waiting for an escort. Both times she asked LEWINSKY what she was doing there, and both times LEWINSKY replied that she was there to see Presidential Secretary, BETTY CURRIE. This concerned PALMIERI as she had hoped LEWINSKY would stop visiting the West Wing. PALMIERI told Deputy Chief of Staff, EVELYN LIEBERMAN that she had seen LEWINSKY in the West Wing. LIEBERMAN was upset, but PALMIERI could not remember what, if anything, LIEBERMAN said. PALMIERI believed this may have occurred in December 1996.

PALMIERI believed that LEWINSKY and CURRIE were friendly. She often saw them chatting at CURRIE's desk.

PALMIERI was shown a diagram of the 1st floor of the West Wing. PALMIERI marked this in red ink. This diagram is attached to this FD-302 and incorporated by reference. PALMIERI described her office space in the Chief of Staff's Office area, and its location in relation to the Oval Office. PALMIERI stated she believed the door between the Oval Office study and the Presidential Dining Room is probably locked. PALMIERI knew that this is not proper access to the Oval Office. The proper routine is to be cleared in by BETTY CURRIE at the main entrance to the Oval Office.

PALMIERI was shown a series of photos for identification purposes.

She was shown color photo HB-2846 and identified the following from left to right: ANDY BLOCKER (Legislative Affairs, (L.A.), departed); CHRIS WALKER (L.A. current); STACY RUBIN (L.A.); ANN JOHNSON (left White House employ); MIKE WILLIAMS (L.A.); ANN CATALINI-SINCLAIR (living in San Francisco); and LEWINSKY. Photo taken January 30, 1996, probably at PAT GRIFFIN's going away party in PANETTA's Office.

Photo 4B-4652 - black-and-white photo dated November 17, 1995, in Chief of Staff's Outer Office: GENE SPERLING (National Economic Council Director), HAROLD ICKES,

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Continuation of OIC-302 of JENNIFER M. PALMIERI . On 2/6/98 . Page 4

President CLINTON, BARRY TOIV, ERSKINE BOWLES, and MONICA LEWINSKY.

Photo HB-4655 - black and white photo dated November 17, 1995, outside PANETTA's Office, left to right: LEWINSKY, SPERLING, STEPHANOPOLOUS, TOIV, President CLINTON, and BOWLES.

Photo HB-4656 - black and white photo dated November 17, 1995, in PANETTA's Office, left to right: SPERLING, LEWINSKY, and President CLINTON.

Photo HB-4658 - black and white photo dated November 17, 1995, in PANETTA's Office, left to right: LEWINSKY, MARTHA FOLEY, SPERLING, and President CLINTON.

PALMIERI stated that she had not been instructed by anyone on what to say at this interview. After receiving the request for this interview, PALMIERI told her superior, STEPHANIE STREET, and then spoke to CHERYL MILLS, Associate Counsel to the President. PALMIERI did not talk about her testimony. The President never spoke with her concerning LEWINSKY, or the ongoing Whitewater investigation. PALMIERI advised that White House staffers follow the story in the newspapers, and talk amongst themselves about who is going to the Grand Jury. PALMIERI stated she did know that OIC investigators were interviewing TIM KEATING this same day.

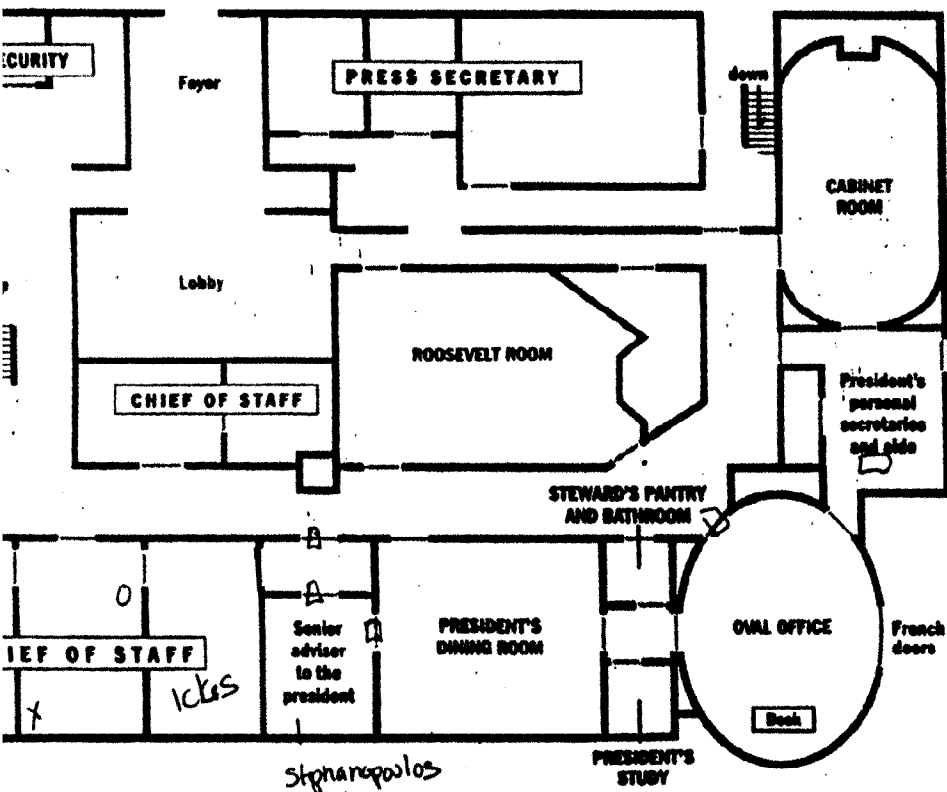
PALMIERI further advised that she never spoke to either VERNON JORDAN or BRUCE LINDSEY about this matter.

25B-2-6-78

THE WASHINGTON POST

## THE PRESIDENCY IN CRISIS

# Searches for Potential Eyewitnesses in West Wing



FILE PHOTO BY ROBERT A. REEDER—THE WASHINGTON POST

President Clinton in Oval Office last January. White House employees who have access to rooms adjoining Oval Office have been called to testify before grand jury.

Attorneys are questioning grand jury witnesses about the layout of the White House's West Wing, particularly the Oval Office. With their many questions about sight lines, furniture arrangements and security officers, they are whether it would have been possible for anyone to see President Clinton and Monica Lewinsky in the study. The diagram above is an approximation.

monitoring high-stakes votes in Congress day He had been

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Jennifer Palmieri, 2/24/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE  
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## Page 1

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

In re:

## GRAND JURY PROCEEDINGS

Grand Jury Room No. 4  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001  
Tuesday, February 24, 1998

The testimony of JENNIFER MARIE PALMIERI was taken  
in the presence of a full quorum of Grand Jury 97-2,  
empaneled on September 19, 1997, commencing at 1:47 p.m.,  
before:

SOLOMON WISENBERG  
MARY ANNE WIRTH  
DARRYL JOSEPH  
JACKIE M. BENNETT, JR.  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, Northwest  
Suite 490 North  
Washington, D.C. 20004

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(1) answer the questions we put to you and answer them  
(2) truthfully.  
(3) A Yes.  
(4) Q But you have certain privileges. You may refuse to  
(5) answer any question if a truthful answer to the question  
(6) would tend to incriminate you. Do you understand that?  
(7) A Yes.  
(8) Q It's the privilege against self-incrimination.  
(9) A Uh-huh.  
(10) Q Anything that you do say may be used against you  
(11) by the grand jury or in a later legal proceeding. Do you  
(12) understand that?  
(13) A Yes.  
(14) Q You do have other privileges in addition to the  
(15) right against self-incrimination. You've got the attorney-  
(16) client privilege, which means if I ask you a question the  
(17) answer to which would reveal a communication you had with  
(18) your lawyer, you would not have to answer that. Do you  
(19) understand that?  
(20) A Yes.  
(21) Q If a question I asked you impinged on the marital  
(22) communications, you wouldn't necessarily have to answer that.  
(23) Do you understand that?  
(24) A Yes.  
(25) Q But with the exception of those privileges that I

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(1) Whereupon,  
(2) JENNIFER MARIE PALMIERI  
(3) was called as a witness and, after having been duly sworn by  
(4) the Foreperson of the Grand Jury, was examined and testified  
(5) as follows:  
(6) EXAMINATION  
(7) BY MR. WISENBERG:  
(8) Q Would you state your full name for the record,  
(9) please, and then please spell your last name for the record?  
(10) A Jennifer Marie Palmieri and it's spelled  
(11) P-a-l-m-i-e-r-i.  
(12) Q And that's pronounced Palmieri?  
(13) A Uh-huh.  
(14) Q Ms. Palmieri, my name is Sol Wisenberg and I am  
(15) with the Office of Independent Counsel. I have no colleagues  
(16) with me right now. These are the grand jurors and this is a  
(17) grand jury court reporter.  
(18) Before we get started, I'm going to tell you a  
(19) little bit about our authority and tell you your rights and  
(20) responsibilities as a witness before the grand jury.  
(21) I'll occasionally ask you if you understand what  
(22) I'm saying and I'll ask you for an audible response because  
(23) the court reporter can't pick up a shake of the head or an  
(24) un-uh or an uh-uh. All right?

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(1) A Okay.  
(2) Q This is a federal grand jury empaneled by a federal  
(3) judge conducting an investigation of possible violations of  
(4) federal criminal laws involving perjury, obstruction of  
(5) justice and subornation of perjury.  
(6) I'm going to read you a portion of the order issued  
(7) by the U.S. Court of Appeals for the D.C. Circuit which sets  
(8) out the limits of this particular investigation.  
(9) "The Independent Counsel shall have jurisdiction  
(10) and authority to investigate to the maximum extent authorized  
(11) by the Independent Counsel Reauthorization Act of 1994  
(12) whether Monica Lewinsky or others suborned perjury,  
(13) obstructed justice, intimidated witnesses or otherwise  
(14) violated federal law other than a Class B or C misdemeanor  
(15) or infraction in dealing with witnesses, potential witnesses,  
(16) attorneys or others concerning the civil case Jones v.  
(17) Clinton."  
(18) Do you understand what I just read to you from the  
(19) court's order?  
(20) A Mm-hmm.  
(21) Q Yes?  
(22) A Yes. I'm off to a bad start.  
(23) Q Okay. I'm now going to read you your rights and  
(24) responsibilities as a grand jury witness.  
(25) As a general rule, you understand that you have to

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(1) have named to you, you understand that you have to answer the  
(2) questions put to you?  
(3) A Yes.  
(4) Q If you have retained counsel, the grand jury will  
(5) permit you a reasonable opportunity to step outside the grand  
(6) jury room to consult with counsel. Do you understand that?  
(7) A Yes.  
(8) Q You understand they can't be in here with you, but  
(9) you can go outside -  
(10) A Right. Yes.  
(11) Q And I understand you have counsel here today, is  
(12) that correct?  
(13) A Yes.  
(14) Q Who is that?  
(15) A Richard Sauber.  
(16) Q All right. And how do you spell that?  
(17) A S-a-u-b-e-r.  
(18) Q All right. We are bound by an oath of secrecy.  
(19) That is, myself, my colleagues, the grand jurors and the  
(20) court reporter. With a few exceptions, which we will get  
(21) into, we are not allowed to go and blab to the world or to  
(22) anybody what you say here today. Do you understand that?  
(23) A Yes.  
(24) Q You, on the other hand, are not bound by the oath  
(25) of secrecy. You can tell your lawyer, you can go hold a news

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(1) conference out front. I'm not encouraging you to do that.  
(2) A No.  
(3) Q But you can if you want.  
(4) A I wasn't planning on that.  
(5) Q You understand that?  
(6) A Yes, I do.  
(7) Q You are free to tell or not tell, that's up to you  
(8) and your attorney. Do you understand?  
(9) A Yes.  
(10) Q Some of the exceptions to our oath of secrecy, as  
(11) an example, if there was ever an indictment in a trial that  
(12) came out of our investigation and you were to be called as a  
(13) witness and you said something on the stand different than  
(14) you say here today, anybody could take your transcript and  
(15) say "Ms. Palmieri said something different in the grand  
(16) jury." That would be an example where we could breach the  
(17) secrecy. Do you understand that?  
(18) A That's with anybody who's testifying, it doesn't  
(19) have to be - I mean, at the actual trial, me up there -  
(20) Q Right. Any witness who says something in a court  
(21) that's different than what they said in a grand jury, that's  
(22) an example of when grand jury secrecy can be breached.  
(23) A I see. Okay.  
(24) Q Another example is we have federal agents, FBI  
(25) agents, who are helping us with our investigation. We can

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[1] tell them what goes on in the grand jury, but they also are  
 [2] bound by an oath of secrecy. Do you understand that?  
 [3] A Yes.  
 [4] Q A court can require us or allow us to reveal --  
 [5] could issue a court order, a court can always do this in any  
 [6] investigation, can issue a court order allowing or requiring  
 [7] the prosecutor to reveal some grand jury material. Do you  
 [8] understand that?  
 [9] A Yes.  
 [10] Q All right. There are several categories of  
 [11] witnesses who appear before the grand jury. I should say  
 [12] there are three basic categories: targets, subjects and  
 [13] witnesses. I don't know if your attorney has discussed that  
 [14] with you.  
 [15] A No.  
 [16] Q A target is somebody who the prosecutor and the  
 [17] grand jury feel it's more than likely that that person is  
 [18] going to be indicted at the time that they're called. You  
 [19] are not a target. Do you understand that?  
 [20] A Yes.  
 [21] Q Do you understand target as I've defined it to you?  
 [22] A Yes.  
 [23] Q A subject would be somebody who is not yet at the  
 [24] target status, but the grand jury has serious questions about  
 [25] them. They want kind of an explanation from them. There's

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[1] some suspicion on them. Do you understand that definition?  
 [2] A Yes.  
 [3] Q You are not a subject. Do you understand that?  
 [4] A Yes.  
 [5] Q Witnesses are somebody who the grand jury wants  
 [6] information from about a subject that the grand jury is  
 [7] investigating. Do you understand that definition?  
 [8] A Yes.  
 [9] Q Do you understand that you're a witness?  
 [10] A Yes.  
 [11] Q Do you understand we cannot guarantee any witness  
 [12] or subject that they will never become a target?  
 [13] A Yes.  
 [14] Q Because it's an unfolding investigation and we  
 [15] don't know what we'll find.  
 [16] A Sure.  
 [17] Q Do you understand that?  
 [18] A Yes, I do.  
 [19] Q All right. You are here today pursuant to  
 [20] subpoena. Is that correct?  
 [21] A Yes.  
 [22] Q And did the subpoena call for you to be here  
 [23] personally or personally with documents, any documents?  
 [24] A No, just personally. No documents.  
 [25] Q Okay. You understand that you have to tell the

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[1] truth?  
 [2] A Yes.  
 [3] Q Do you understand that if you lie to us about what  
 [4] the law calls a material matter that would be perjury, that's  
 [5] against a criminal law?  
 [6] A Yes.  
 [7] Q Okay. You have a right to have clear questions  
 [8] during the questioning, you have the right to have clear  
 [9] questions from your questioners.  
 [10] A Okay.  
 [11] MR. WISENBERG: Your questioner has just arrived.  
 [12] Let the record reflect that my colleague,  
 [13] Ms. Wirth, has just entered the grand jury room.  
 [14] BY MR. WISENBERG:  
 [15] Q And so along those lines, if there's any question  
 [16] that I ask or Ms. Wirth asks that's not clear, that you want  
 [17] us to repeat or to break down and ask in more coherent way,  
 [18] do not hesitate to do so. Do you understand that?  
 [19] A Yes.  
 [20] Q All right. Do you have any questions about the  
 [21] grand jury's authority or about your rights and  
 [22] responsibilities as a grand jury witness?  
 [23] A No.  
 [24] Q And, again, if you need to confer with your  
 [25] attorney or just need to take a break every so often for any

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[1] particular health related reason or anything like that, don't  
 [2] hesitate to ask.  
 [3] A Okay.  
 [4] MR. WISENBERG: All right. With that, I will hand  
 [5] over questioning.  
 [6] BY MR. WISENBERG:  
 [7] Q Can you tell us your age, please?  
 [8] A Thirty-one.  
 [9] Q And your place of birth?  
 [10] A Pascagoula, Mississippi.  
 [11] Q And what is your occupation currently?  
 [12] A I'm the Deputy Director of Scheduling at the White  
 [13] House.  
 [14] Q And how long have you been with the White House?  
 [15] A I started in August of '94.  
 [16] Q And how did you get your job in the White House?  
 [17] A I worked for Leon Panetta for many years and I was  
 [18] working for him at the Office of Management and Budget and  
 [19] then he became Chief of Staff at the White House and I went  
 [20] with him.  
 [21] Q You worked with him outside the White House before?  
 [22] A Uh-huh.  
 [23] Q And what was your first job in the White House?  
 [24] A It was Special Assistant to the Chief of Staff.  
 [25] Q Okay. And for what period of time did you hold

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[1] that job?  
 [2] A August of '94 until January of '97.  
 [3] Q Okay. And what happened in January of '97?  
 [4] A Leon Panetta left the White House when Erskine  
 [5] Bowles became the Chief of Staff and I started my job in the  
 [6] scheduling office in March of '97.  
 [7] Q Do you know Monica Lewinsky?  
 [8] A Yes.  
 [9] Q And when did you first meet her?  
 [10] A I guess it was the summer of '95.  
 [11] Q Okay. And what were the circumstances under which  
 [12] you met her?  
 [13] A She was an intern in the Chief of Staff's  
 [14] correspondence office.  
 [15] Q And as an intern, was she paid, do you know?  
 [16] A No.  
 [17] Q And how long did her internship last, if you know?  
 [18] A As I recall, I'm not sure at what point she got  
 [19] there in the summer, but she was there in the summer and the  
 [20] early part of the fall, is my recollection.  
 [21] Q Okay. And where was her work station, if you know?  
 [22] A It was in the Old Executive Office Building. It  
 [23] was actually in the correspondence office for the whole White  
 [24] House. You know, we have the Office of Presidential Letters  
 [25] for the whole White House and within that we had a

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[1] correspondence office for the Chief of Staff, but it was all  
 [2] within the same office. You know, it was all in the same  
 [3] room. So she was over there.  
 [4] Q Okay. Thank you. Did you have any role in hiring  
 [5] her?  
 [6] A Oh, as an intern? No.  
 [7] Q Do you know who did?  
 [8] A Well, she was selected -- you know, all the White  
 [9] House interns are selected by the intern program. Karen  
 [10] Abramson was the director of the program at the time and she  
 [11] would -- we had sometimes as many as four interns in the  
 [12] correspondence office. I'm not exactly sure, maybe it's  
 [13] three or five, something like that, and Karen would assign  
 [14] them to the office.  
 [15] Q Do you know anything about how she came to her  
 [16] internship?  
 [17] A I know it was someone -- it was probably Karen  
 [18] Abramson, but to be honest, I'm not sure who, told me that  
 [19] one of the reasons that she was selected was because of her  
 [20] connection with Walter Kaye.  
 [21] Q And do you know what that connection was?  
 [22] A I don't, actually. I thought it was a family  
 [23] friend. I thought that she was friends with -- you know, her  
 [24] parents were friends with Walter Kaye, something like that.  
 [25] Q Where was your office located at that time, when

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[1] she was an intern?  
 [2] A The first floor of the West Wing.  
 [3] Q Okay. And where in relation to where Mr. Panetta  
 [4] sat did you sit?  
 [5] A Well, if you have a diagram I can show you, but I  
 [6] sat right outside his door.  
 [7] MR. WISENBERG: We have a diagram.  
 [8] THE WITNESS: You do? How convenient. Here's  
 [9] one -- is this --  
 [10] MS. WIRTH: That's a blank. I'm trying to find  
 [11] another one.  
 [12] Okay. We're just going to mark this as Exhibit  
 [13] JP-1 and this is a diagram of the West Wing.  
 [14] (Grand Jury Exhibit No. JP-1 was  
 [15] marked for identification.)  
 [16] MS. WIRTH: I'm just going to show it to you and  
 [17] give you this green pen. If you could mark where your office  
 [18] was.  
 [19] THE WITNESS: No, I'm sorry --  
 [20] MS. WIRTH: You can put your initials there maybe.  
 [21] THE WITNESS: Okay.  
 [22] MS. WIRTH: Okay. And could you mark where  
 [23] Mr. Panetta's office was with his initials? Thanks.  
 [24] BY MS. WIRTH:  
 [25] Q Okay. So for the record, you've marked a room,

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[1] not sure and you all could probably figure this out -- but I  
 [2] think maybe she didn't have any pass at that point. I think  
 [3] she didn't have an intern pass.  
 [4] Her internship was, I think, officially over at  
 [5] that point and so I think that she was cleared in as an  
 [6] appointment, you know, where you just get an A badge and  
 [7] you're just a guest.  
 [8] So when that happens, you have to go -- wherever  
 [9] they're escorted into, either the west lobby on the first  
 [10] floor or the west basement on the ground floor, and normally  
 [11] a uniform division person will be, a secret service person  
 [12] will be posted there and they'll call you and they'll tell  
 [13] you that your guest is there and you have to go get them.  
 [14] Q Now, you mentioned that during the shutdown for  
 [15] this period of time that you've just described that she  
 [16] worked in the Chief of Staff's office, is that correct?  
 [17] A Yes.  
 [18] Q Where did she sit?  
 [19] A Do you want me to show you on the diagram?  
 [20] Q Yes.  
 [21] A Shall I use her initials?  
 [22] Q Yes. And if you could indicate exactly where she  
 [23] sat.  
 [24] A Okay. That is actually where I sat and that's --  
 [25] Q Indicating where your initials are and you put a

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[1] that Mr. Panetta is in room 111 and that you were in the room  
 [2] adjacent to his, directly to the right of it, if you're  
 [3] looking at this diagram.  
 [4] A Mm-hmm.  
 [5] Q Now, did you ever see Monica Lewinsky during the  
 [6] period when she was an intern?  
 [7] A Sure.  
 [8] Q And did she ever come into the office of the Chief  
 [9] of Staff?  
 [10] A Yes. When she was an intern, she did not have --  
 [11] she didn't have access to the West Wing without an escort, so  
 [12] she would come over with someone from the correspondence  
 [13] office occasionally and drop mail off. Not every day, you  
 [14] know, but, you know, maybe two or three times a week. Or  
 [15] sometimes I would go meet her in the basement and pick it up.  
 [16] Q Okay. And you mentioned a moment ago that she had  
 [17] to be escorted. Who would bring her in?  
 [18] A Tracey Bobowick was her name and she was the head  
 [19] of the correspondence office for us.  
 [20] Q And what type of pass did Monica Lewinsky have at  
 [21] that time?  
 [22] A She had an orange pass, we call them. They're just  
 [23] for -- you just have access to the Old Executive Office  
 [24] Building and the New Executive Office Building. And then  
 [25] there was a time when Monica worked in the West Wing for a

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[1] box around them.  
 [2] A Yes. I put a box. Okay. She was right here.  
 [3] Q Okay. And you've indicated, for the record, with  
 [4] her initials in the same room where you were on the other  
 [5] side of the room and that's where she sat for those days.  
 [6] A Yes.  
 [7] Q There's a desk there?  
 [8] A Yes, there's a desk there. Or there was at the  
 [9] time.  
 [10] Q Was she the only intern who sat in that same office  
 [11] with you during the shutdown?  
 [12] A As I recall, she was. -- Harold Ickes was in the  
 [13] office where your finger is right now, room 108, and it's  
 [14] possible that Harold had an intern out there as well, but I  
 [15] don't -- I just don't remember that. I recall it just being  
 [16] Monica and I.  
 [17] Q And who normally sat at the desk where Monica was  
 [18] sitting during the shutdown?  
 [19] A Nobody, actually. It was just kind of an empty  
 [20] desk.  
 [21] Q And what was her job during the shutdown?  
 [22] A During the shutdown, for at least for those few  
 [23] days, before the White House's funding bill was passed, you  
 [24] had to be deemed essential staff to work and I was the only  
 [25] person in the Chief of Staff's office that was deemed

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[1] few days during the shutdown.  
 [2] Q Okay. And approximately when was that?  
 [3] A It was in November of '95 and I didn't recall the  
 [4] dates exactly until they were shown to me in my FBI  
 [5] interview, but I think it was like the 15th through the 18th  
 [6] of November, something like that.  
 [7] MS. WIRTH: Okay. I'm going to mark as JP-2 this  
 [8] document which is a WAVE report.  
 [9] (Grand Jury Exhibit No. JP-2 was  
 [10] marked for identification.)  
 [11] BY MS. WIRTH:  
 [12] Q If you could look at that and tell us what, if  
 [13] anything, that document tells you about whether you waved her  
 [14] in during the period of time that you're talking about or  
 [15] whether you escorted her in.  
 [16] A Yes. It shows that I waved her in -- do you want  
 [17] me to say how many days and everything?  
 [18] Q And which days, if you could.  
 [19] A Okay. It shows that I waved her in twice on  
 [20] November 15th, twice on November 16th, three times on  
 [21] November 17th and once on November 18th.  
 [22] Q And when you did that, do you have to go somewhere  
 [23] to meet her and then bring her in? How does that work?  
 [24] A Well, yes. How it's supposed to work is that if  
 [25] somebody gets cleared in, a visitor, and I think -- and I'm

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[1] essential. So she came in just to help answer phones and,  
 [2] you know, do things like that, run errands, et cetera.  
 [3] Q And you agree that she was present in your office  
 [4] during the days on the WAVE report?  
 [5] A I mean, to be honest, it's not -- that's not what I  
 [6] remember. I mean, just, you know, when this first all  
 [7] happened and I first got my attorney and talked to him about  
 [8] what my recollections were, I remembered her being there just  
 [9] a couple of days, but this -- you know, I've seen the WAVE  
 [10] records, I've seen -- when the FBI interviewed me, they  
 [11] showed me photos of her being there on different days and,  
 [12] you know, that makes sense and it seems right, but to be  
 [13] honest, it wasn't -- my initial recollection was that it was  
 [14] only a couple of days but, you know, it looks like it was  
 [15] four.  
 [16] Q And the days that she was there during the  
 [17] shutdown, for what hours was she there?  
 [18] A Well, it was a very odd time, you know, and there  
 [19] was a lot of just sitting around and waiting, you know.  
 [20] Usually our budget team would be up on the Hill and I would  
 [21] say back when Leon Panetta was up there. And so -- I mean, I  
 [22] think we would come in at normal times, like around 8:00, but  
 [23] sometimes be there until 11:00 at night.  
 [24] Q And was she keeping those hours as well?  
 [25] A Yes. I would -- you know, I mean, like anybody

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1 who's volunteering, I would encourage them not to have to  
 2 stay for that long, she certainly wasn't under any obligation  
 3 to, but she -- I know that she certainly stayed -- I remember  
 4 one night in particular I think she went out to get pizza and  
 5 came back in and it was pretty late, so I remember she was  
 6 certainly willing to stay later.  
 7 Q And the pizza was for the whole group?  
 8 A Yes, I think so. You know, we would send different  
 9 kids out.  
 10 Q Now, during the shutdown, did the President come to  
 11 the Chief of Staff's office?  
 12 A Yes, he did.  
 13 Q Do you remember approximately how many times?  
 14 A I'm not sure exactly, but I remember maybe --  
 15 during the time that Monica was there, maybe three or four  
 16 times. Something like that.  
 17 Q And when he came, how long did he stay?  
 18 A He would come in -- you know, we were in the  
 19 reception area and he would come in there and he might just  
 20 chat for a couple of minutes and, you know, either then  
 21 proceed in to see Leon or, if Leon wasn't there, he would  
 22 just, you know, ask me, you know, well, what's going on, is  
 23 Leon around, is he on the Hill. But it was a very odd time.  
 24 You know, there was -- like I said, there was a lot  
 25 of people that were left back at the White House who were

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1 hadn't started yet because of the shutdown, she wasn't able  
 2 to be hired, and I liked her, she was really good when she  
 3 was in the correspondence office, she was always very willing  
 4 to work hard, she was always willing to stay late and, you  
 5 know, whatever, and she was very conscientious. So I was  
 6 pretty comfortable with her and so I thought she would be a  
 7 good person to help me out.  
 8 Q Now, you mentioned a moment ago that she was  
 9 familiar with other senior people besides the President.  
 10 A Mm-hmm.  
 11 Q Do any names spring to mind?  
 12 A Well, I mean, just whoever was around at the time,  
 13 which is the people who were nearby, which would be Leon,  
 14 Harold Ickes, George Stephanopoulos, you know, probably --  
 15 I don't know, just whoever was around. I guess -- was  
 16 McCurry around? Yeah, McCurry.  
 17 Q Okay. You mentioned a moment ago also that  
 18 Monica was slated to get a job in the Office of Legislative  
 19 Affairs.  
 20 A Uh-huh.  
 21 Q Did there come a time when she eventually got that  
 22 position?  
 23 A Yes.  
 24 Q And do you remember approximately when that was?  
 25 It was -- I think it was in December, I think. I

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1 just kind of sitting around not doing anything and he  
 2 certainly wasn't going up to the Hill himself, so he himself  
 3 was just kind of waiting around and, you know, waiting to get  
 4 information back from the Hill. And so he wandered around  
 5 and chatted more often than he normally would because he  
 6 normally wouldn't have the time to do that.  
 7 Q Okay. And during those occasions, did you ever see  
 8 him speak to Monica Lewinsky?  
 9 A Yes.  
 10 Q And can you tell us what you remember about those  
 11 conversations?  
 12 A I certainly don't remember anything specific. I  
 13 mean, I can't recall like a specific comment that he made to  
 14 her, but they were -- it was -- you know, it was normal  
 15 pleasantries that were exchanged. You know, oh, it's so nice  
 16 for you -- you know, he would say to her that it was so nice  
 17 for her to pitch in and help and stuff like that.  
 18 Q Do you have any recollection of how Monica Lewinsky  
 19 reacted to seeing the President? What her demeanor was?  
 20 A She -- I was -- I was a little bit concerned  
 21 because it was unusual for the President to come to our  
 22 office to begin with and, obviously, you don't want people  
 23 bothering him or, you know, being too chatty or familiar with  
 24 him. And she was very excited to meet him. It was my  
 25 impression that it was probably the first time she ever had.

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1 think it was right after the shutdown.  
 2 Q And that would be December of '95?  
 3 A Yes.  
 4 Q And for that position, where was her work station  
 5 located, if you know?  
 6 A It was in the East Wing.  
 7 Q And what type of pass would she have had at that  
 8 time?  
 9 A A blue pass, which would give you access to the  
 10 West Wing.  
 11 Q Without an escort?  
 12 A Right.  
 13 Q And do you know what her duties were in that job?  
 14 A She worked in the correspondence office, answering  
 15 letters from members of Congress.  
 16 Q And when she got that position, how often would you  
 17 see her approximately?  
 18 A Oh, I would see her in the hallways and stuff.  
 19 Q In the West Wing?  
 20 A Mm-hmm.  
 21 Now, could I -- excuse me for just one second.  
 22 I want to ask my lawyer one question.  
 23 MS. WIRTH: Sure.  
 24 MR. WISENBERG: When you come back, before you  
 25 enter, if you could just knock at the door.

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1 And so she was kind of giddy and bubbly and so I  
 2 was concerned, you know, I kind of -- remember just kind of  
 3 cringing, thinking, like, oh, God, is she going to say  
 4 something stupid. And she didn't, you know, I mean, it  
 5 seemed fine, but I was concerned because she was a little too  
 6 familiar. Not just with him, but with a lot of the more  
 7 senior staff, too. You know, I would prefer that interns  
 8 just sit there and answer the phone and not chat. So --  
 9 Q And did you speak to anybody about that, about your  
 10 concerns that you've just described?  
 11 A Did I speak to anybody about that? At the time?  
 12 No.  
 13 Q And the other people --  
 14 A Not that I recall. I mean, it's possible I might  
 15 have said something to Leon Panetta about it or it's possible  
 16 that Leon -- I kind of remember him maybe rolling his eyes at  
 17 me, you know, like walking by her, because she would answer  
 18 the phone really cheery and it wasn't really his style. I  
 19 mean, I didn't say anything because I was embarrassed because  
 20 I'm the one who brought her there, so I did not say -- I  
 21 don't remember that I said anything to anybody.  
 22 Q When you say you're the one that brought her there,  
 23 did you select her in particular?  
 24 A Yes, I did select her. You know, she was getting  
 25 ready to start a job at Legislative Affairs and I knew she

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1 THE WITNESS: Okay.  
 2 (The witness was excused to confer with counsel.)  
 3 BY MS. WIRTH:  
 4 Q Is there anything that you need to add to any  
 5 answer that you've given previously?  
 6 A No.  
 7 Q Okay. I think when we took our break we were  
 8 talking about Ms. Lewinsky's new job and where her work  
 9 station was located. And I believe you testified that she  
 10 got that job in late December of '95 or some time --  
 11 A No, I think it was -- I think she was actually  
 12 selected for the job before the shutdown but because they  
 13 weren't able to hire, she hadn't started.  
 14 Q All right. And I think you also were telling us  
 15 that you did see her after she got her new job.  
 16 A Mm-hmm.  
 17 Q And I believe you said in the West Wing? Yes?  
 18 A Yes. Mm-hmm.  
 19 Q And how often?  
 20 A Oh, you know, I don't know. I mean, maybe once a  
 21 week, something like that.  
 22 Q And do you know what she was doing there? If you  
 23 know.  
 24 A Not really, no. I mean, I would -- you know, I see  
 25 people all the time coming and going from their office, just

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[1] other places. I mean --  
 [2] Q Where in the West Wing did you see her?  
 [3] A I would see her -- I've seen her near -- I would  
 [4] see her in the hallway like going from the East Wing to the  
 [5] West Wing. I would see her at the mess. I would see her --  
 [6] I saw her a few times by Betty Currie's desk outside the Oval  
 [7] Office.  
 [8] Q Was she talking to anyone at that time?  
 [9] A Sure. You know, I presume she was talking -- I  
 [10] would see her talking to Betty quite a bit. As far as when  
 [11] she was in that room. You know, there are always usually  
 [12] people around there, you know, Nancy Hemreich sits there,  
 [13] too, and at the time Stephen Goodin would normally be around.  
 [14] But my recollection is when I would see her, normally she  
 [15] would be talking to Betty.  
 [16] Q Other than Betty, did you ever see her with anyone  
 [17] else?  
 [18] A You know, sure. It's possible that I saw her with  
 [19] the President, you know, standing around Betty's desk. I  
 [20] never saw her in the Oval Office. But the President, you  
 [21] know, he walks -- particularly if he's not in a meeting but  
 [22] what we call his phone and office time and, you know, making  
 [23] calls and going through paperwork and stuff, he'll wander in  
 [24] and out of his office, give papers to Betty and, you know,  
 [25] chat with whoever is standing around there. So, you know, I

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[1] can kind of envision that. I don't even know if I'm  
 [2] imagining it to be honest, but I wouldn't be surprised if I  
 [3] saw that, too.  
 [4] Q But you have no positive recollection.  
 [5] A No. I mean, other than the times I saw them  
 [6] talking in the Chief of Staff's office.  
 [7] Q During the shutdown?  
 [8] A During the shutdown. Yes.  
 [9] Q Did you ever speak to her on any occasion when you  
 [10] saw her in the West Wing when she was in the Office of  
 [11] Legislative Affairs?  
 [12] A Oh, I'm sure I did. Yes.  
 [13] Q Do you have any positive recollection of any of  
 [14] those conversations?  
 [15] A Not really. You know, just to say hello, how are  
 [16] you doing, you know, how's the new job going, that type of  
 [17] thing.  
 [18] Q Did she ever discuss the President with you?  
 [19] A Probably. I think she -- during the shutdown,  
 [20] again, I think that after he left -- you know, one time when  
 [21] he would come by and after he left, you know, we walked out  
 [22] of the room and, you know, she was like, oh, my gosh, I can't  
 [23] believe the President was just here, something like that.  
 [24] And, you know, I think I might have said something to her at  
 [25] some point like, you know, you realize that you're really

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[1] lucky to be here during this time because normally the  
 [2] President doesn't -- you know, he's too busy and doesn't have  
 [3] time to, you know, come and chat with people. So I said  
 [4] something to the effect that it was unusual probably. So,  
 [5] you know, she seemed excited that she was able to be there.  
 [6] Q Other than that conversation, any other  
 [7] conversations with her about the President at any time,  
 [8] either during the shutdown or when she was in her permanent  
 [9] job?  
 [10] A I don't remember -- I don't remember anything  
 [11] specifically. You know, it's possible. You know, I -- it is  
 [12] possible that I might have, I just don't remember anything in  
 [13] particular.  
 [14] Q And other than the possibility that you've  
 [15] discussed a moment ago, that you may have seen her talking to  
 [16] the President in the area of Betty Currie's office --  
 [17] A Right.  
 [18] Q -- do you have any other recollection of ever  
 [19] seeing her with the President at any time?  
 [20] A Oh, I saw that -- you know, that thing on CNN where  
 [21] they hugged, where he hugged her on the rope line after  
 [22] the -- the day after the election. I was there and I saw  
 [23] that. And I remember -- I mean, I didn't just remember it on  
 [24] my own, but when I saw the footage of it, I remember  
 [25] thinking, oh, yeah, I saw her come in and I saw her at -- you

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[1] know, I saw her come into the West Wing at that time and she  
 [2] didn't work there any more and I saw her on the rope line. I  
 [3] remember that.  
 [4] Q When you say you saw her come into the West Wing  
 [5] prior to going on the rope line?  
 [6] A Yes. That day.  
 [7] Q Did you speak to her that day?  
 [8] A I probably said hello.  
 [9] Q Who was she friendly with in the White House?  
 [10] A She was friendly with Tracey Bobowick, who I  
 [11] described earlier is the head of our correspondence office.  
 [12] She was friendly with Betty. She was friendly with some  
 [13] people -- Tracey worked for the admin office before she  
 [14] worked for us and so through Tracey, she became friendly with  
 [15] Ashley Raines and Kelly McClure from the Management and  
 [16] Administration Office. And beyond that, I'm not really sure.  
 [17] Q Now, did there come a time when you heard talk  
 [18] about Monica around the White House?  
 [19] A Yes.  
 [20] Q Okay. Can you tell the grand jury when that was  
 [21] approximately?  
 [22] A Well, you know, I'm not sure what you mean by talk  
 [23] around the White House exactly. I mean, what do you mean by  
 [24] that? Like someone --  
 [25] Q Talk about Monica and the President.

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[1] A Can I go outside?  
 [2] MS. WIRTH: Yes.  
 [3] (The witness was excused to confer with counsel.)  
 [4] BY MS. WIRTH:  
 [5] Q I believe the question was -- go ahead and answer.  
 [6] Do you remember the question?  
 [7] A I think it was -- what was the question?  
 [8] Q The question was something like did there come a  
 [9] time --  
 [10] A When there was talk. Yes. And basically it  
 [11] happened, you know, almost immediately in the first few days  
 [12] of the shutdown where, like I said before, she just kind of  
 [13] behaved inappropriately and, you know, there was -- and to be  
 [14] honest, I can't recall exactly when it started but just kind  
 [15] of an uneasiness about -- like her being too familiar.  
 [16] Q And the inappropriate behavior that you mentioned  
 [17] just now, was it anything beyond being too familiar?  
 [18] A Not that I ever saw.  
 [19] Q And were there people who were concerned that she  
 [20] was hanging around the West Wing too much?  
 [21] A Yes.  
 [22] Q And do you remember who that was?  
 [23] A Specifically, Evelyn Lieberman.  
 [24] Q Did you ever speak with her yourself about that?  
 [25] A Yes.

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[1] Q What do you remember about that conversation?  
 [2] A She said -- she said something to me during, you  
 [3] know, I think it must have been like on that Saturday, on the  
 [4] 18th, she hadn't been around because of the shutdown, she was  
 [5] not essential, she was the Deputy Press Secretary at the  
 [6] time, and she -- I saw her, I don't remember -- actually,  
 [7] when this all first -- the story broke and I first recalled  
 [8] this, my recollection was that Evelyn was the Deputy Chief of  
 [9] Staff and she took me into her office and now I realize that  
 [10] could not have been true because Evelyn was the Deputy Press  
 [11] Secretary at the time, in the West Wing but across the way  
 [12] from me. But having a conversation with her, I think in the  
 [13] hallway, where she told me, "I want you to get rid of that  
 [14] girl." And I was -- which seemed to me to think that she had  
 [15] seen her and, you know, didn't like the way she behaved.  
 [16] Q Do you remember when that conversation took place  
 [17] A I think it was -- I kind of remember seeing Evelyn  
 [18] in casual clothes, to my recollection, so I assume it must  
 [19] have been on that Saturday.  
 [20] Q Which was the weekend of the shutdown?  
 [21] A Yes, I think it was the Saturday. I think it was  
 [22] the 18th.  
 [23] Q And did she give any reason for why she said that?  
 [24] A No. No, she did not. She didn't say anything more  
 [25] than that.

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(1) Q Did you ask her?  
 (2) A No. I didn't ask her.  
 (3) Q Why?  
 (4) A Well, I said -- I think I might have said -- I  
 (5) don't know. I think I might have said something like "You're  
 (6) being ridiculous. What are you talking about?" And she  
 (7) didn't offer me any explanation. You know, I don't even know  
 (8) if she said it again. And those probably aren't her exact  
 (9) words, either. But --  
 (10) Q And at that time, Monica was an intern.  
 (11) A Right.  
 (12) Q And you knew that she was about to get a permanent  
 (13) job.  
 (14) A Yes, but what I think she meant by that when she  
 (15) said, "I want you to get rid of her," is she meant like I  
 (16) want her out of the West Wing. Which is not unusual for  
 (17) Evelyn. She -- even when she -- even before she became the  
 (18) Deputy Chief of Staff and she was the Deputy Press Secretary,  
 (19) she was something of a hall monitor, if you will.  
 (20) You know, she would like -- she didn't like anybody  
 (21) in the West Wing who didn't belong there because, you know,  
 (22) there's a lot of people who will just like try to walk by the  
 (23) Oval Office and hope to see the President.  
 (24) And she certainly didn't like interns in there that  
 (25) didn't belong and she didn't like interns, or staff members

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(1) for that matter, whose skirts were too short or whose blouses  
 (2) were too low cut or, you know, and she had no problem walking  
 (3) up to somebody she'd never met in her life and like send them  
 (4) home because their skirt was too short. So it was not out of  
 (5) character, I guess, for her to do something like this.  
 (6) Q Is that the only conversation you had with Evelyn  
 (7) Lieberman about Monica Lewinsky?  
 (8) A Probably not. But -- because, you know, after that  
 (9) happened, you know, once Monica was permanently installed,  
 (10) there was -- you know, rumblings about, you know, concern  
 (11) about her hanging around the Oval Office too much. So at  
 (12) that point Evelyn was the Deputy Chief of Staff, she was  
 (13) right across the hall from me, we were relatively close, so  
 (14) it is conceivable to me and probably even likely that we  
 (15) would have talked about it again, but I don't remember a  
 (16) specific conversation.  
 (17) Q Other than Evelyn Lieberman, were there other  
 (18) people who were concerned about Monica hanging around the  
 (19) West Wing too much?  
 (20) A Yes, I think there was. I would say there was kind  
 (21) of a general -- I just picked up, almost like a general  
 (22) concern, you know, she would walk -- she would be by Betty  
 (23) and, you know, I would notice, for instance, that it seemed  
 (24) to me anyway that Nancy Henreich wouldn't talk to Monica,  
 (25) which seemed to say something to me, that like Nancy did not

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(1) approve her being around whereas Betty, you all have probably  
 (2) met Betty, and she's a very friendly, open person that's nice  
 (3) to everyone. So there just kind of seemed to be a general  
 (4) feeling from Nancy and Evelyn -- you know, they just didn't  
 (5) like how she was always hanging around.  
 (6) Q But no one other than Evelyn Lieberman springs to  
 (7) mind as a person who expressed a concern?  
 (8) A You know -- not -- no. I mean, nobody -- no one --  
 (9) I can't imagine who else it would be that was really, you  
 (10) know -- it was something that Evelyn would do, that's just  
 (11) kind of her role, that she made to be her role, anyway.  
 (12) Q Did anybody ever express a concern or a worry or  
 (13) appear to be worried about an affair between Monica and the  
 (14) President?  
 (15) A I guess what I would say -- and I think this is  
 (16) what I told the FBI after much consternation because it's  
 (17) hard because I know the next question is going to be, well,  
 (18) who said that and I can't remember. I'd say that there was  
 (19) definitely general rumors going around through, you know, the  
 (20) Chief of Staff's office via Evelyn and the Office of  
 (21) Legislative Affairs where Monica worked, just kind of a  
 (22) general feeling like she's kind of -- we use the word clutchy  
 (23) which you've all probably come to learn is somebody who hangs  
 (24) around, tries to hang around the President too much. And  
 (25) there was concern about her just hanging around Betty's desk

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(1) and, you know, why is she there and, you know, she shouldn't  
 (2) be there. Just like -- you know, almost like haunting the  
 (3) President.  
 (4) And then there would be people who would speculate  
 (5) beyond that, well, gee, do you think that means they're  
 (6) having an affair. But, you know, no one's ever said to me I  
 (7) saw them come out of the Oval Office. I saw her go in alone  
 (8) or something like that.  
 (9) Q And you yourself, did you ever see anything that  
 (10) would lead you to believe that there was such a relationship?  
 (11) A No.  
 (12) Q And did you ever hear from anyone else anything  
 (13) specific that would lead you to believe that there was such a  
 (14) relationship?  
 (15) A The only thing that I heard and I can't -- I can't  
 (16) recall exactly who told me, but I remember hearing something  
 (17) about her coming in on a weekend and trying to get in to see  
 (18) the President and not and a Secret Service agent trying to  
 (19) stop her and then eventually being -- being overridden by the  
 (20) President or someone else and going in.  
 (21) Q Who did you hear that from?  
 (22) A I don't remember.  
 (23) Q Do you remember when that happened?  
 (24) A My memory is being there in the summer and being  
 (25) there on a weekend in the summer and somebody telling me

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(1) that.  
 (2) Q Summer of '96?  
 (3) A I guess it was the summer of '96.  
 (4) Q Was she still employed at the White House at that  
 (5) time?  
 (6) A I guess. I don't know.  
 (7) Q Do you have a memory --  
 (8) A You know, I just don't -- I just remember it  
 (9) being a weekend and it being hot, to be honest. I don't --  
 (10) and it was very -- you know, it's a very vague recollection.  
 (11) MR. WISENBERG: Let the record reflect that  
 (12) Mr. Bennett and Mr. Joseph have entered the grand jury  
 (13) room.  
 (14) BY MS. WIRTH:  
 (15) Q You stated a moment ago you don't remember who told  
 (16) you that.  
 (17) A No. It's possible that it was the Secret Service  
 (18) person themselves, to be honest, but I just don't remember.  
 (19) It's possible it was rumored to me by somebody who worked in  
 (20) Legislative Affairs. I just don't remember.  
 (21) Q Do you know the name of the Secret Service agent  
 (22) involved?  
 (23) A No. I mean, I presumed this might be what Officer  
 (24) Fox talked about, but I don't -- I think if he came down  
 (25) himself and told me this just happened I would remember that,

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(1) so I think it was from a third source that I heard it, it was  
 (2) not from somebody who was directly there.  
 (3) Q Did you discuss that incident with anyone else that  
 (4) you recall?  
 (5) A No. I don't remember that. My lawyer.  
 (6) Q At the time --  
 (7) A No, I don't remember that.  
 (8) Q Do you recall ever having any conversations with  
 (9) Tim Keating --  
 (10) A Mm-hmm.  
 (11) Q -- about an affair, speculation about an affair  
 (12) between the President and Monica?  
 (13) A I don't recall that, but it's possible. He is a  
 (14) likely suspect, if you will, for someone that I would have  
 (15) talked to about that.  
 (16) Q Who is he?  
 (17) A He is -- he was at the time the staff director for  
 (18) Legislative Affairs.  
 (19) Q So he was --  
 (20) A He's in the private sector now.  
 (21) Q He was above Monica in the chain?  
 (22) A Mm-hmm. Mm-hmm.  
 (23) Q And just tell us the best you can whatever  
 (24) recollection you have of speaking to him, if there is  
 (25) any.

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[1] A I just don't -- I don't have any specific  
 [2] recollection other than -- I mean, Tim is somebody who I  
 [3] would speak with many times a day so -- from '94 to '96. I  
 [4] certainly think that at some point, you know, I probably said  
 [5] like, "Hey, what's the deal with Monica? She's hanging  
 [6] around all the time." You know.  
 [7] Q So you think you probably had such a conversation,  
 [8] might have had such a conversation or you're sure you had  
 [9] such a conversation?  
 [10] A I would say I probably had such a conversation.  
 [11] BY MR. WISENBERG:  
 [12] Q Pardon me for interrupting. Let me ask a couple of  
 [13] things. If I understood you correctly, you said that there  
 [14] are a couple of things. At first, there were people talking  
 [15] about the amount of time that Monica's hanging around the  
 [16] Oval Office, is that correct?  
 [17] A Right.  
 [18] Q And then based upon that, there's some people  
 [19] speculating, do you think there's an affair, is that correct?  
 [20] A Right.  
 [21] Q Now, I take it that the -- if I understood you  
 [22] correctly, this speculating was going on primarily in the  
 [23] Chief of Staff or coming through, I think you said, the Chief  
 [24] of Staff's office and Office of Legislative Affairs?  
 [25] A Right.

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[1] Q Okay. Is that an office that -- and you probably  
 [2] just answered this -- is that an office that Mr. Keating was  
 [3] in, Office of Legislative Affairs?  
 [4] A Yes. Yes.  
 [5] Q Okay. Were you one of the people that was  
 [6] speculating about whether or not there might be an affair?  
 [7] A Was I one of the people speculating?  
 [8] Q Yes, you said --  
 [9] A I was in conversations where other people  
 [10] speculated about it. I don't recall myself ever speculating  
 [11] on it.  
 [12] Q I'm not trying to imply there's anything wrong with  
 [13] that, I was just --  
 [14] A Yes.  
 [15] Q Informationally, you had to have some knowledge, to  
 [16] have some knowledge of the speculation you had to have at  
 [17] least been on the receiving end of one conversation about it  
 [18] where somebody mentioned it, do you think this is going on,  
 [19] something like that. And, as I understand your answer, you  
 [20] don't remember necessarily speculating yourself, but you  
 [21] remember overhearing somebody speculate.  
 [22] A Well, probably more than just overhearing somebody  
 [23] else speculate, probably somebody -- probably someone saying  
 [24] to me, gee, I wonder if they're having an affair. But  
 [25] nothing -- I don't have any specific --

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[1] MR. WISENBERG: Okay. Sorry.  
 [2] BY MS. WIRTH:  
 [3] Q Is Susan Brophy someone you may have spoken to  
 [4] about this?  
 [5] A Yes. She's another person in Legislative Affairs  
 [6] that I spoke with a lot. It's possible.  
 [7] Q Is that also probably you're sure or you might  
 [8] have?  
 [9] A That is not -- I don't feel as -- I feel less  
 [10] likely of that than with Tim. I think that's probably --  
 [11] what was the range?  
 [12] Q Well, you can --  
 [13] A I liked your range.  
 [14] Q You have a definite memory, probably, you might  
 [15] have --  
 [16] A Might have. I would say might have with Susan.  
 [17] Might have.  
 [18] Q What about Evelyn Lieberman? Anything more  
 [19] specific than you've already discussed?  
 [20] A No. No. Just I would say maybe might have with  
 [21] her.  
 [22] Q What about Harold Ickes?  
 [23] A I don't recall ever discussing this with Harold.  
 [24] It's possible, but I just don't -- I don't recall that.  
 [25] Q And what about Mr. Panetta?

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[1] A I don't -- I don't recall really talking to Leon  
 [2] about it either. He wasn't a big -- you know, he wasn't one  
 [3] to really engage in chat like that. I guess you could say.  
 [4] Q And so of the whole group we've discussed, the most  
 [5] likely person that you discussed it with is Mr. Keating?  
 [6] A Mm-hmm.  
 [7] Q And is there anybody else I haven't mentioned that  
 [8] you have any recollection of discussing it with?  
 [9] A No.  
 [10] Q During any of these conversations that you have  
 [11] some recollection of, do you recall anyone giving any facts  
 [12] that formed the basis for any speculation that there was an  
 [13] affair between the President and Monica Lewinsky?  
 [14] A Do I remember -- I'm not sure I understand.  
 [15] Q Anyone mentioning any particular fact like they saw  
 [16] this or --  
 [17] A They saw this or that? No. No one -- I don't  
 [18] remember anybody ever saying to me I saw them, you know, in  
 [19] the Oval Office. No.  
 [20] Q And your relationship with Monica Lewinsky, was it  
 [21] professional?  
 [22] A Mm-hmm.  
 [23] Q Did you ever socialize with her?  
 [24] A No.  
 [25] Q Did there come a time when Monica Lewinsky left the

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[1] White House?  
 [2] A Yes.  
 [3] Q And do you know why?  
 [4] A I don't know why.  
 [5] Q What do you know about why she left the White  
 [6] House?  
 [7] A I have read -- I mean, to be honest -- I didn't  
 [8] know she was leaving, I had heard she left, and, you know,  
 [9] there was speculation, I guess, that she left because Evelyn  
 [10] didn't want her hanging around any more. I don't remember  
 [11] ever -- I don't believe I ever had a conversation with Evelyn  
 [12] about her actually leaving, though.  
 [13] Q That was my next question. Do you recall anybody  
 [14] that you discussed that with, her leaving?  
 [15] A No, I was -- you know, at that point, I felt --  
 [16] after she actually left, I remember hearing about it  
 [17] afterwards and, you know, being mildly surprised, I guess.  
 [18] Q Did you ever discuss --  
 [19] A Tim might have told me, to be honest.  
 [20] Q Did you ever discuss it with Mr. Panetta?  
 [21] A Her leaving?  
 [22] Q Yes.  
 [23] A No.  
 [24] Q You know that she was asked to leave the White  
 [25] House?

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[1] A No, I don't know she was asked to leave the White  
 [2] House.  
 [3] Q Do you know Jocelyn Jolley?  
 [4] A Mm-hmm. Yes.  
 [5] Q And she also worked at the Office of Legislative  
 [6] Affairs correspondence office?  
 [7] A Yes.  
 [8] Q And she was Monica's supervisor?  
 [9] A Yes, I guess.  
 [10] Q Did there come a time when she also left the White  
 [11] House?  
 [12] A To be honest, I didn't -- yeah, she did. I didn't  
 [13] really know.  
 [14] Q Did you know whether that was at the same time as  
 [15] Monica?  
 [16] A I have read in the newspaper that it was the same  
 [17] time as Monica, but I didn't know that at the time or  
 [18] didn't -- it didn't make any impression on me, anyway.  
 [19] Q Do you know anything about why she left the White  
 [20] House?  
 [21] A I had heard that she wasn't very good.  
 [22] Q Who did you hear that from?  
 [23] A Probably Tim.  
 [24] Q When did you hear that?  
 [25] A I think what I remember hearing, I believe Chris

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Walker is the person who took Jocelyn's place -- no, actually -- is that right? I don't know if that's right. I can't remember, to be honest. Whoever took Jocelyn's place, I think I remember Tim saying to me this is really good because we're going to have a new office and we're going to have a lot better people in it and it was, you know, it was not going well under Jocelyn and it's going to be better now. Something like that.

Q Were you personally aware of any performance problems on the part of Jocelyn Jolley?

A No, I wasn't personally aware of it. No.

Q And prior to the time that she left, had you heard from anyone that she wasn't performing well?

A You know, it's just -- I can't say. It's just hard for me to distinguish between what I think I know now and what I thought I knew then. I think that I just kind of remember hearing like she wasn't producing that well.

Q But you don't know where?

A No.

Q Do you know what happened to Jocelyn Jolley?

A No, I don't know where she went.

Q Did you know that she was given a job at GSA?

A No, I didn't know that.

Q Did you learn that Monica Lewinsky went to the Pentagon to work after she left the White House?

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A Yes.

Q And do you know how it was that she got her job at the Pentagon?

A No.

Q Is there anything unusual about her getting that position at the Pentagon given, you know, the fact that she was asked to leave the White House?

A I don't know.

Q Do you know any other staff members at the White House who were asked to leave and got jobs at the Pentagon?

A No. I mean, I feel like I should say that I have read that happened to Linda Tripp, but I do not know that and I wasn't there at the time when Linda Tripp left, so I don't know.

Q Do you know any other persons dismissed from the White House for the same reasons as Monica was?

A Well, I don't know that Monica was even dismissed from the White House.

Q Well, you said that at the time she left the White House, there was a concern that she was hanging around too much, correct?

A Yes.

Q Do you know anybody else who was dismissed for that reason?

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A I'm sorry, for that reason? No.

Q Do you recall anything about the reaction around the White House at the time Monica left?

A No. To be honest, I don't remember there was much of a reaction. I think she was actually probably gone quite a while before I had any knowledge that she had left.

Q Now, after Monica was no longer working at the White House, did you ever see her there again?

A Uh-huh. I did. I saw her there a few times.

Q Can you tell us how many times and on what occasions you can remember?

A I can't tell you specifically how many times. I remember seeing her once in the west basement of the White House on the ground floor and I remember seeing her another time in the west lobby. I remember seeing her coming in for that event in November of '96 on the South Lawn.

Q That's the rope line event you mentioned a while ago?

A Yes.

Q When you saw her in the West Wing basement, what was she doing?

A She appeared to be waiting for an escort.

Q In what area?

A In the west basement, probably sitting on one of the couches there.

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Q Was she with anyone?

A I don't remember.

Q Do you remember what time of day that was?

A It was normal business hours. I think it was morning, but I don't know.

Q And you said you saw her in the West Wing waiting for an escort? Is that right?

A She appeared to me to be waiting. I think I her what she was doing there, I think she told me that she was going to see Betty. So she seemed to be waiting for Betty or someone to come get her.

Q Did you see anybody speak to her on that day?

A Did I see anybody speak to her? I kind of n when I saw her, her talking to somebody else, you know, somebody else probably just happened to be walking by, but I don't recall anything definitive.

Q At what time of day was that, in the morning?

A It seems like it was in the morning again, but I don't know for sure. I'm pretty sure it was business hours, though.

MR. WISENBERG: Pardon me just a moment. We need to take a ten-minute break. May the witness be excused?

THE FOREPERSON: Yes, she may.

(Witness excused. Witness recalled.)

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BY MS. WIRTH:

Q Ms. Palmieri, you've just testified about three instances on which you saw Monica Lewinsky at the White House after she had left the White House to go work at the Pentagon.

A Yes.

Q And the first one was the rope line on November 6th, approximately --

A Oh, I don't know -- I mean, that's the first one I said, I don't remember the order in which they happened.

Q But in any event, after the election you saw the rope line and you were present that day.

A Mm-hmm.

Q Did you see her talk to the President on that day?

A I guess. You know, I think -- I saw him hug her. Not beyond the rope line.

Q And the other two occasions you mentioned in the West Wing basement and the other the West Wing Lobby, did you speak to Monica on those occasions, those last two?

A I think I did. Yes.

Q And what did you say to her?

A I think probably -- I remember specifically when I saw her in the west lobby, I asked her what she was doing there.

Q And what did she say?

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A She said she was there to see Betty.

Q And did you say anything further to her?

A I mean, I might have asked her how she was, something like that.

Q What about in the West Wing basement? Did you speak to her on that occasion?

A Yes, that is less -- I don't know why, but it's just less clear in my mind and I'm pretty sure I said hello to her. Actually, no, I think I remember saying hello to her and I think she had just gotten her hair cut or something and I told her I liked her new haircut or something like that.

Q Okay. Did you report her presence in the West Wing to anyone else on those two occasions?

A Not that I remember on the first occasion. E me. The occasion in the west basement. When I saw her in the west lobby, I told Evelyn Lieberman that she was there.

Q And what did Evelyn Lieberman say, if anything?

A I don't remember. To be honest, I don't think I said anything to me.

Q What was her reaction?

A She -- I went into her office, I told her that, I left and she left her office shortly after that.

Q Was she upset when you told her this?

A Was she upset?

Q Yes.

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[1] A No. I mean, I don't -- she did not appear to be  
 [2] upset to me.  
 [3] Q Do you remember telling the FBI when you were  
 [4] interviewed by them on February 6th of this year that  
 [5] Ms. Lieberman was upset when you told her you had seen  
 [6] Ms. Lewinsky?  
 [7] A I don't remember. I mean, I guess I did, but I  
 [8] don't remember saying that. She wasn't happy about it.  
 [9] She was not pleased to hear this, I guess is how I would  
 [10] characterize her reaction.  
 [11] Q And you derived that from her expression?  
 [12] A Right. I really don't think she said anything to  
 [13] me, but I think that from her expression she seemed not  
 [14] pleased and it seemed to me that she then left and went to go  
 [15] talk to her, but I don't know that. I just saw her walk down  
 [16] the hall. I don't know where she went.  
 [17] Q Why did you report these two sightings of Monica to  
 [18] Ms. Lieberman?  
 [19] A Because -- like I said before, that there were  
 [20] concerns -- you know, there had been concern about her  
 [21] hanging around too much and I knew at that point that she had  
 [22] left the White House, it had been rumored that she had left,  
 [23] that she had been, you know, asked to leave, so the fact that  
 [24] she was back hanging out in the West Wing didn't seem a good  
 [25] thing to me and so, like I said before, Evelyn was kind of

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[1] the hall monitor, so I reported it to her.  
 [2] Q Okay. Do you know if anything came of that report?  
 [3] A I walked out in the west lobby a few minutes later  
 [4] and Monica was gone. I don't know. I mean, she could have  
 [5] been in to see Betty. I don't know where she was at that  
 [6] point.  
 [7] MS. WIRTH: I'm going to show you some photographs  
 [8] which have been marked Grand Jury Exhibits JP-3 through 9.  
 [9] So you'll see 3, 4, 5, 6, 7, 8 and 9.  
 [10] (Grand Jury Exhibits Nos. JP-3  
 [11] through JP-9 were marked for  
 [12] identification.)  
 [13] MS. WIRTH: And what I'm showing you are Xerox  
 [14] copies of photographs and next to them the actual  
 [15] photographs.  
 [16] And what I'd like you to do is just go through each  
 [17] one of them, read the Grand Jury exhibit number and tell the  
 [18] grand jury what the picture is of and who is in the picture.  
 [19] And perhaps while you're doing that, you might hold up the  
 [20] original for them and just point out what you see.  
 [21] THE WITNESS: Okay. So JP-3 is --  
 [22] MS. WIRTH: Start with 3 and go all the way through  
 [23] for us, please.  
 [24] THE WITNESS: Okay. This is a photo that was taken  
 [25] in Leon Panetta's office.

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[1] BY MS. WIRTH:  
 [2] Q And you're holding up JP-3?  
 [3] A I'm sorry. 3. Should I just go through and say  
 [4] who everybody is?  
 [5] Q Sure.  
 [6] A This is Andy Blocker. I believe all of these  
 [7] people -- yes, at the time, all these people worked at  
 [8] Legislative Affairs. That's Andy Blocker. That's Chris  
 [9] Walker. This is Stacey Rubin. Elisa Milsap. You know him.  
 [10] That's Ben Freeland. Ann Johnson. Mike Williams. Ann  
 [11] Cattalini. And Monica Lewinsky.  
 [12] Q Okay. Reading from left to right. And do you know  
 [13] what that photograph -- when that was taken, what occasion?  
 [14] A Well, it says it was taken on January 30, 1996 and  
 [15] I have to believe that was Pat Griffin's going away party.  
 [16] BY MR. WISENBERG:  
 [17] Q And you said "You know him," that refers to  
 [18] President Clinton?  
 [19] A Yes. This is the President. Yes.  
 [20] BY MS. WIRTH:  
 [21] Q Okay. Next, please? You can do them in a group,  
 [22] if you like, if it's easier for you. If there are pictures  
 [23] that are duplicative of each other.  
 [24] A Oh, okay. Yes. I think some of these are.  
 [25] Q Just read the numbers out while you're talking.

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[1] A Okay. This is JP-4, 5 -- I think JP-4 and 5 are  
 [2] the only ones that are similar. This is my office and this  
 [3] is Barry Toiv. That is Harold Ickes. That's the President.  
 [4] That's Gene Sperling. That is Erskine Bowles. And that's  
 [5] Monica Lewinsky.  
 [6] Q And that's reading from left to right. And what  
 [7] occasion was that or what time?  
 [8] A That was the night -- there's the President eating  
 [9] pizza. That was the night that I believe we sent Monica out  
 [10] to get pizza for everyone.  
 [11] Q During the shutdown.  
 [12] A During the shutdown.  
 [13] BY MR. WISENBERG:  
 [14] Q And you went left to right except that Ms. Lewinsky  
 [15] is actually in the foreground, she's a little to the left of  
 [16] Mr. Bowles in the picture. Is that correct?  
 [17] A That's right.  
 [18] Q Okay. Otherwise, you went left to right, correct?  
 [19] A Yes.  
 [20] Q That appears to be the original photograph of JP-4,  
 [21] correct?  
 [22] A Right. JP-5 is going left to right Monica  
 [23] Lewinsky, Barry Toiv, George Stephanopoulos, Gene Sperling,  
 [24] the President and Erskine Bowles  
 [25] Q The same evening? If you know.

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[1] A It looks like it is. Says so on the back. Yes.  
 [2] Q Also in your office?  
 [3] A Also in my office. Okay. And then this -- JP-6 is  
 [4] left to right Barry Toiv, Monica Lewinsky and the President.  
 [5] BY MR. WISENBERG:  
 [6] Q And what is the date on that?  
 [7] A November 17th. Same day. And another one, JP-7,  
 [8] also Barry Toiv, Monica Lewinsky and the President. Same  
 [9] day. And then JP-8 is November 17th, same day, from left to  
 [10] right, Monica Lewinsky, Martha Foley, Barry Toiv, and the  
 [11] President. JP-9, from left to right is Martha Foley, Monica  
 [12] Lewinsky, Barry Toiv and the President.  
 [13] BY MS. WIRTH:  
 [14] Q Same date?  
 [15] A Same date.  
 [16] Q Okay. Did you ever hear anything about Monica  
 [17] Lewinsky moving to New York?  
 [18] A Oh, just in the newspapers.  
 [19] Q Nothing before that?  
 [20] A No.  
 [21] Q Do you know anything or have you heard anything  
 [22] about any efforts on the part of the President or anyone else  
 [23] in the White House to get her a job in New York?  
 [24] A Oh, just what I've read in newspapers.  
 [25] Q Have you heard anything about Vernon Jordan

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[1] assisting her in any way to get a job in New York other than  
 [2] what you've read in the newspapers?  
 [3] A No, I have not.  
 [4] Q Have you ever heard anything about the fact that  
 [5] Monica Lewinsky was a witness in the Paula Jones case, other  
 [6] than what you've read in the papers?  
 [7] A No.  
 [8] Q Have you ever heard anything about her, Monica  
 [9] Lewinsky, filling out an affidavit in the Paula Jones case  
 [10] other than what you've seen in the papers?  
 [11] A No.  
 [12] Q And did you speak to anyone prior to being  
 [13] interviewed by the FBI about what you would say prior to your  
 [14] talking to the FBI in February '98?  
 [15] A No, I did not discuss what I would say or what I  
 [16] remembered about Monica. Certainly there has been a great  
 [17] deal of talk in the White House about the whole incident, the  
 [18] situation as we call it. But I've never talked to anyone  
 [19] about my personal recollections of her being there.  
 [20] Q You advised your supervisor that you were going to  
 [21] be speaking with the FBI?  
 [22] A Uh-huh. I did.  
 [23] Q And you spoke to Cheryl Mills as well?  
 [24] A Yes.  
 [25] Q Did you speak to Cheryl Mills about the substance

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[1] of what you would be saying to the FBI?  
 [2] A No, I did not. No.  
 [3] Q And what about prior to your testimony here today?  
 [4] Have you spoken with anyone from the White House about your  
 [5] testimony here today?  
 [6] A I have not spoken with anyone about my testimony.  
 [7] I told a number of people that I would be here today.  
 [8] Q Okay. Who have you told?  
 [9] A I told Stephanie Streett, who is my supervisor.  
 [10] My lawyer told Cheryl Mills, Deputy Counsel. I had to  
 [11] explain to some people yesterday that I would not be able to  
 [12] be at work today, so I told Doug Sosnik. I think that's it.  
 [13] I told Nancy Henreich I would not be there today and this  
 [14] was why.  
 [15] Q The grand jurors have a couple of questions for  
 [16] you. The first pertains to the comment that you testified  
 [17] about earlier that Evelyn Lieberman made to the effect  
 [18] "I want you to get rid of that girl."  
 [19] A Yes.  
 [20] Q That comment was made during the shutdown? Is that  
 [21] right?  
 [22] A That's my recollection. Yes.  
 [23] Q And what was your understanding of what she  
 [24] meant by that comment in terms of what you were supposed  
 [25] to do?

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[1] A I'd like to talk to my lawyer about that.  
 [2] (The witness was excused to confer with counsel.)  
 [3] THE WITNESS: Okay. So if you'll say the question  
 [4] again?  
 [5] BY MS. WIRTH:  
 [6] Q I think what I asked was the comment that you  
 [7] testified about earlier, that Evelyn Lieberman made to you  
 [8] during the shutdown, something to the effect of "I want you  
 [9] to get rid of that girl," what was your understanding of what  
 [10] she wanted you to do in response to that comment?  
 [11] A What was my understanding of what she wanted me to  
 [12] do?  
 [13] Q Yes.  
 [14] A I think that she did not want her to be in the West  
 [15] Wing, was my understanding of that comment.  
 [16] A JUROR: And what did you do?  
 [17] THE WITNESS: I told Monica that she -- that it was  
 [18] quiet and I didn't need her help and she should take the rest  
 [19] of the day off.  
 [20] BY MS. WIRTH:  
 [21] Q Did you do anything further in response to that  
 [22] comment?  
 [23] A No.  
 [24] Q Did Monica come back to work the next day?  
 [25] A No, that was -- as I recall, that was the last day

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[1] of the shutdown. I think that was Saturday and on Sunday I  
 [2] think the Treasury-Postal bill passed and we had our funding  
 [3] and everybody came back to work.  
 [4] Q The grand jurors also had another question about  
 [5] the fact that Monica was reassigned to the Pentagon after she  
 [6] left the White House and the question was do you have any  
 [7] idea why she would be given a job in the Pentagon under the  
 [8] circumstances where she would have an opportunity to come  
 [9] back to the White House?  
 [10] A I'm sorry, I don't understand.  
 [11] Q The question is why would Monica Lewinsky be given  
 [12] a job in the Pentagon upon leaving the White House where that  
 [13] job would provide her with an opportunity to come back to the  
 [14] White House on occasions? As part of the job. If you have  
 [15] any idea.  
 [16] A I don't know. No.  
 [17] BY MR. WISENBERG:  
 [18] Q Okay. I just have a few questions. Did I  
 [19] understand you to say that she might not have even been an  
 [20] intern, Monica, during the shutdown? Technically? That she  
 [21] might have been in some status in between internship and her  
 [22] staff job?  
 [23] A You know, how we can find out, can we go back and  
 [24] look at these pictures?  
 [25] Q Sure.

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[1] A If she's got a pass on, you can see what kind of  
 [2] pass she has. Yes. See, she has an appointment badge on?  
 [3] Q All right.  
 [4] A And intern would have -- when she was an intern,  
 [5] she had an orange pass.  
 [6] Q Okay.  
 [7] A So I think this means that she probably had turned  
 [8] in her badge from when she was an intern and she got this  
 [9] other badge.  
 [10] Q Okay. You said that the President during the  
 [11] shutdown would come in and chat with people in your office.  
 [12] Do you recall that?  
 [13] A Yes.  
 [14] Q Would he chat with everybody?  
 [15] A There weren't that many people there. I mean, my  
 [16] recollection is it was just me and Monica and -- well, you  
 [17] know, obviously these pictures show that on different times,  
 [18] you know, George or Gene, other people might have been  
 [19] hanging around.  
 [20] Q Did he appear to spend an inordinate amount of time  
 [21] chatting with Monica as opposed to others during this time  
 [22] period?  
 [23] A Yes, he did.  
 [24] Q All right. Was that commented upon?  
 [25] A Was that commented upon?

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[1] Q By people. In other words, you obviously noticed  
 [2] that.  
 [3] A I noticed that. It made me uncomfortable because I  
 [4] didn't want her to be bothering him.  
 [5] Q Okay. All right. Anything about the President's  
 [6] interaction with -- do you recall -- let me go back. Do you  
 [7] recall discussing that? You said it bothered you. Do you  
 [8] remember discussing that with anyone at the time?  
 [9] A I don't remember discussing it at the time other  
 [10] than the interaction I had with Evelyn Lieberman, in which  
 [11] she said to get rid of her.  
 [12] Q Okay. But that was her saying that to you.  
 [13] A Right. I don't remember saying it to -- I don't  
 [14] remember talking to anyone about it at the time. I was more  
 [15] of in a watch and see mode.  
 [16] Q Okay. Was there anything -- I'm sorry, I cut you  
 [17] off.  
 [18] A In my own mind, that's where I was.  
 [19] Q Okay. Anything about the President's interaction  
 [20] with Monica Lewinsky, and I don't just mean going in and  
 [21] chatting, I mean during the entire shutdown period, the  
 [22] period that you're talking about when Monica was in your  
 [23] office helping --  
 [24] A Yes, those four days. Yes.  
 [25] Q Anything about the President's interaction with

## Page 61

[1] Monica during the shutdown that raised eyebrows, yours or  
 [2] anyone else's, other than what you've told us?  
 [3] A Interaction between the two of them?  
 [4] Q Right.  
 [5] A That I witnessed?  
 [6] Q That you witnessed or heard about that raised  
 [7] eyebrows among yourself or among others. Again, other than  
 [8] what you've already reported to us.  
 [9] A No. I'm not sure I really understand. I mean, are  
 [10] you just saying is there anything else that I haven't --  
 [11] Q Right. Anything about -- not just about when he  
 [12] came in and chatted, but anything about the whole four-day  
 [13] period or however long it was, anything else that kind of  
 [14] raised any eyebrows, either that you witnessed or heard  
 [15] about? An example would be was she seen going into the  
 [16] hallway off the dining room? That would be an example of  
 [17] something really unusual. Anything like that?  
 [18] A No.  
 [19] Q Okay. Anything having to do with her delivering  
 [20] pizza to the President? Like maybe -- you said you sent her  
 [21] out for pizza. About her personally going in and delivering  
 [22] it to him.  
 [23] A Oh. I don't -- I have never -- I don't even know  
 [24] if it's the power of suggestion, you saying that, I have  
 [25] never -- that never entered my mind, but now that you say

## Page 62

[1] that, I think she did tell me that.  
 [2] Q Okay. Just that she had gone and delivered pizza  
 [3] to him?  
 [4] A Yes. I'd like to talk to my lawyer about this  
 [5] because this never came up before.  
 [6] MR. WISENBERG: Sure. Sure. Knock when you're  
 [7] ready to come in.  
 [8] (The witness was excused to confer with counsel.)  
 [9] BY MR. WISENBERG:  
 [10] Q Okay. I think we were talking about --  
 [11] A Pizza.  
 [12] Q -- pizza and what she told you, what you remember  
 [13] Monica telling you.  
 [14] A It just kind of threw me for a loop because I  
 [15] completely forgot about it until now, but I remember her -- I  
 [16] think -- my recollection as it is coming back to me now, I  
 [17] think maybe she went out to get pizza, came back in and we  
 [18] were sharing it with everyone that was around, I think maybe  
 [19] she brought it down to give a piece to Betty or whomever was  
 [20] sitting out in front of the President's office, it was late  
 [21] at night. I mean, I think the WAVE records show it was like  
 [22] 10:00 or something like that, and so I remember -- then I  
 [23] remember her coming back and being really excited like, oh, I  
 [24] was there and the President was there and, you know, I went  
 [25] in and gave him a piece of pizza.

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[1] Q Okay. Anything other than that that you remember  
 [2] about that?  
 [3] A No.  
 [4] Q Do you remember where she said he was when she  
 [5] delivered it to him?  
 [6] A No. I think she said at his desk, but that's the  
 [7] image I have in my mind. I don't know.  
 [8] Q The desk in the Oval Office?  
 [9] A Yes.  
 [10] Q How long, if you know, how long was she gone  
 [11] delivering pizza to Betty and the President?  
 [12] A I don't know. Sorry.  
 [13] Q No ballpark even?  
 [14] A I didn't even remember it until you said it. I  
 [15] just don't know.  
 [16] Q Okay. Did you recommend her, Monica, for the  
 [17] Legislative Affairs job?  
 [18] A Yes, I did.  
 [19] Q Okay. And why was that?  
 [20] A Because I thought she was good. I mean, the same  
 [21] reason why I had her come and volunteer for us for those few  
 [22] days. She was -- you know, my experience with her, she was  
 [23] conscientious and she was very hard working.  
 [24] Q Is there anything about this situation that makes  
 [25] you angry? The whole situation, the Monica situation.

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[1] A I'd rather not be here today.  
 [2] Q Rather than that?  
 [3] A I'd rather not have hired a lawyer. No. I mean --  
 [4] no. It's too bad. It seems like a big waste of time, but it  
 [5] doesn't make me angry.  
 [6] Q Did you ever hear that Monica -- I think what you  
 [7] told us earlier was you kind of heard about her going to the  
 [8] Pentagon kind of like after it happened, right?  
 [9] A Right.  
 [10] Q Did you ever hear she was sent to the Pentagon  
 [11] because of poor work performance?  
 [12] A Yes, I remember that, too. I remember -- probably,  
 [13] again, from Tim Keating that, you know, not only was -- you  
 [14] know, not only these concerns about her hanging around the  
 [15] Oval Office too much, but that the work quality just in the  
 [16] office as a whole as poor. And so you could attribute that  
 [17] to both Jocelyn and her, I guess.  
 [18] Q Do you recall whether that was something like an  
 [19] afterthought, like -- in other words, she's moved because  
 [20] she's hanging around too much and because of the rumors and,  
 [21] by the way, she didn't do that good of work either, or did  
 [22] somebody actually tell you that was the reason that she was  
 [23] moved out?  
 [24] A I can't say that I recall that for sure.  
 [25] Q Okay. You said that you were -- you talked about

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[1] the times that she came to the White House after she had  
 [2] to the Pentagon and you had asked her what she was doing  
 [3] there.  
 [4] A Mm-hmm.  
 [5] Q Were you confrontational when you did that?  
 [6] you saw her there and asked her what she was doing the  
 [7] A I would not say I was confrontational. I was  
 [8] overtly friendly.  
 [9] Q Okay. You said you didn't hear anything about  
 [10] fact that Monica was on a list of witnesses in the Paula  
 [11] Jones case. Did you hear anything about or was there talk  
 [12] about Monica as another potential problem for the President  
 [13] in connection with people talking about the Paula Jones case  
 [14] In other words, as an example, anybody saying  
 [15] something like "They'd better not find out about Monica,"  
 [16] anything like that?  
 [17] A No. I don't recall anybody saying anything  
 [18] Monica.  
 [19] Q Are you part of a joint defense agreement  
 [20] anybody?  
 [21] A I'm not sure I know what that means.  
 [22] Q Okay. That's typically an agreement between  
 [23] group of attorneys for different witnesses involving a  
 [24] sharing of information.  
 [25] A Well, I have authorized my attorney to speak

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[1] attorneys representing other witnesses. He has spoken with  
 [2] Cheryl Mills, as I told you. He's spoken with Evelyn  
 [3] Lieberman's lawyer and Stephanie Streett's lawyer and the  
 [4] woman who works for David Kendall, Nicki Siegelman, I think  
 [5] her name is.  
 [6] Q Okay. You've authorized him. Anyone else  
 [7] think of?  
 [8] A That's all that I know of.  
 [9] Q All right. How about with anybody working  
 [10] Mr. Bennett?  
 [11] A I don't think he's talked to anybody with Be  
 [12] Q Okay. And you expect then to --  
 [13] A I wouldn't be adverse to him doing that.  
 [14] Q And you've authorized him to debrief those  
 [15] individuals.  
 [16] A Mm-hmm. Is that a joint defense agreement  
 [17] Q It could be. And do you know whether or not  
 [18] he debriefed, for instance, you mentioned Ms. Mills before  
 [19] A Mm-hmm.  
 [20] Q Do you know whether or not he spoke to her  
 [21] the general subject matter of your interview with the Bureau  
 [22] the other day?  
 [23] A I think he did. Yes.  
 [24] Q Okay. And I take it you expect that with regard  
 [25] to these four people, you expect in a general way a

## Page 67

[1] debriefing with regard to your testimony here today.  
 [2] A Not necessarily. I mean, I would not -- I think  
 [3] will ask him to talk to Cheryl about it and I will not ask  
 [4] him to speak with anyone else.  
 [5] Q Okay. I'm not --  
 [6] A Yes. That's just what my plan is. I don't know  
 [7] they may come to us, I don't know.  
 [8] Q We need your phone number at the White  
 [9] you give us -- or at your current --  
 [10] A Yes. It's [REDACTED]  
 [11] Q And how long have you had that number?  
 [12] A As a matter of fact, I've always had that number  
 [13] since August of '94. You take your number with you.  
 [14] Q Okay. And do you have a home number?  
 [15] A [REDACTED]  
 [16] Q Cell phone number?  
 [17] A Well, I have a cell phone, but you just call the  
 [18] White House operator at [REDACTED] and someone will answer  
 [19] phone and just ask them to page me.  
 [20] Q Okay. Beeper?  
 [21] A Same thing. [REDACTED] and say page Jennifer  
 [22] Palmieri.  
 [23] Q You don't have a personal beeper or cell phone?  
 [24] A No, I do not.  
 [25] MR. WISENBERG: Okay. Any other questions?

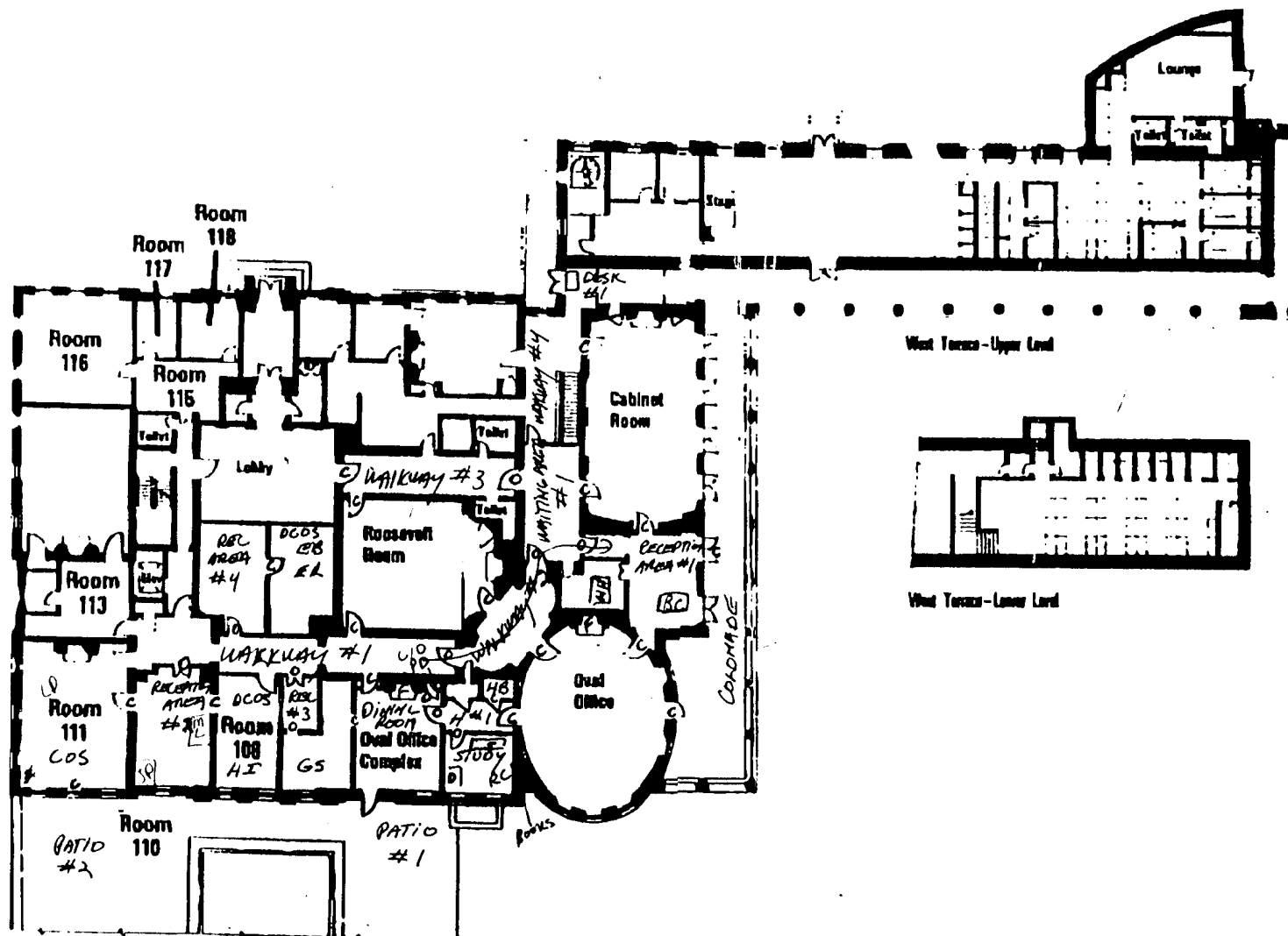
## Page 68

[1] (No response.)  
[2] MR. WISENBERG: All right. Thank you very much  
[3] Let me tell you that sometimes when people come to the grand  
[4] jury, even people who feel they've been here a long time --  
[5] THE WITNESS: It's gone by fast, actually.  
[6] MR. WISENBERG: After they leave, they might  
[7] remember something that they had forgotten about. Just like  
[8] I mentioned pizza and you remembered something you had  
[9] forgotten about --  
[10] THE WITNESS: Yes. That surprised me.  
[11] MR. WISENBERG: And it might be something that's  
[12] relevant or slightly inconsistent with what you've said here.  
[13] If that happens, I would ask you to let your attorney know  
[14] and have your attorney get in touch with Ms. Wirth or with  
[15] myself.  
[16] THE WITNESS: Okay.  
[17] MR. WISENBERG: All right. If there are no more  
[18] questions, may the witness be excused?  
[19] THE FOREPERSON: Yes, she may.  
[20] MR. WISENBERG: Thank you very much.  
[21] (The witness was excused.)  
[22] (Whereupon, at 3:34 p.m., the taking of testimony  
[23] in the presence of a full quorum of the Grand Jury was  
[24] concluded.)  
[25] \*\*\*\*\*

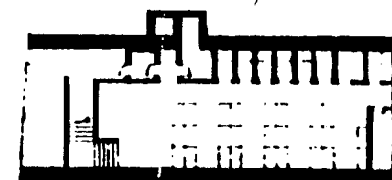
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# First Floor



West Terrace - Upper Level

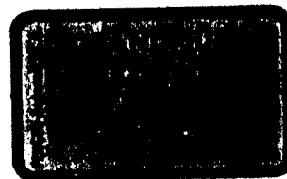


West Terrace - Lower Level

ACC-CO	LAST NAME	FIRST NAME	INI	SSN	ENTRY-C	SCHED	ENTRY-D	VISITEE	MEETING-R	REQUESTOR	DOB	ENTRY
027482	LEWINSKY	MONICA			U33133	09:00	11/15/95	PALMIERI	WW	PALMIERI	07/23/73	08:54
012712	LEWINSKY	MONICA			U11186	11:05	01/03/95	KRAUSE	469	KRAUSE	07/23/73	11:10
034369	LEWINSKY	MONICA			U92692	20:00	07/25/95	BECKETT	WESTLOB	BECKETT	07/23/73	20:21
034371	LEWINSKY	MONICA			U93426	10:00	07/31/95	POTUS	S. GRNDS	RAINES	07/23/73	** **
034370	LEWINSKY	MONICA			U94460	08:45	07/31/95	LEWIS	93	LEWIS	07/23/73	** **
016845	LEWINSKY	MONICA			U06643	08:00	09/06/95	ABRAMSO	4	ABRAMSON	07/23/73	08:00
027479	LEWINSKY	MONICA			U22651	20:00	10/17/95	BECKETT	WESTLOB	BECKETT	07/23/73	19:58
027484	LEWINSKY	MONICA			U33336	17:00	11/15/95	PALMIERI	WW	PALMIERI	07/23/73	17:07
027483	LEWINSKY	MONICA			U33257	13:00	11/15/95	PALMIERI	WW	PALMIERI	07/23/73	13:29
027486	LEWINSKY	MONICA			U33601	15:00	11/16/95	PALMIERI	WW	PALMIERI	07/23/73	14:57
027485	LEWINSKY	MONICA			U33440	09:00	11/16/95	PALMIERI	WW	PALMIERI	07/23/73	09:01
027489	LEWINSKY	MONICA			U34009	21:35	11/17/95	PALMIERI	WW	PALMIERI	07/23/73	21:38
027488	LEWINSKY	MONICA			U33919	14:45	11/17/95	PALMIERI	WW	PALMIERI	07/23/73	** **
027487	LEWINSKY	MONICA			U33706	08:15	11/17/95	PALMIERI	WW	PALMIERI	07/23/73	08:15
027490	LEWINSKY	MONICA			U34017	09:00	11/18/95	PALMIERI	WW	PALMIERI	07/23/73	09:04
027491	LEWINSKY	MONICA			U35614	08:00	11/27/95	JOLLY	EW	JOLLY	07/23/73	** **
027492	LEWINSKY	MONICA			U35274	09:00	11/27/95	BERRY	4013	BERRY	07/23/73	08:56
016862	LEWINSKY	MONICA			U38452	19:00	12/05/95	POTUS	RES	WIDDESS	00/00/00	** **

3203

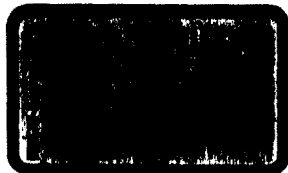
V006-DC-00000005



HB 001001



3204



V006-DC-00001839

HB 2846



V006-DC-00003737

11B 004652



V006-DC-00003740

11B 004655



V006-DC-00003741

HB 004686



V006-DC-00003742

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V006-DC-00003743

11B 004658



V006-DC-00003744

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Leon Panetta, 1/28/98

Grand Jury

Page 1 to Page 208

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CONDENSED TRANSCRIPT AND CONCORDANCE  
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## Page 1

(1) UNITED STATES DISTRICT COURT  
(2) FOR THE DISTRICT OF COLUMBIA  
(3) IN RE;  
(4)  
(5) GRAND JURY PROCEEDINGS  
(6)  
(7)  
(8) Grand Jury Room No. 4  
(9) United States District Court  
(10) for the District of Columbia  
(11) 3rd & Constitution, N.W.  
(12) Washington, D.C. 20001  
(13) Wednesday, January 28, 1998  
(14) The testimony of LEON PANETTA was taken in the  
(15) presence of a full quorum of Grand Jury 97-2, impaneled on  
(16) September 19, 1997, commencing at 9:30 a.m., before:  
(17) SOLOMON WISENBERG  
(18) BRUCE L. UDOLF  
(19) MARY ANNE WIRTH  
(20) STEPHEN JAMES BINHAK  
(21) Associate Independent Counsel  
(22) 1001 Pennsylvania Avenue, N.W.  
(23) Suite 490 North  
(24) Washington, D.C. 20004  
(25)

## Page 2

(1) Whereupon,  
(2) LEON PANETTA  
(3) was called as a witness and, having been first duly sworn by  
(4) the Foreperson of the Grand Jury, was examined and testified  
(5) as follows:  
(6) EXAMINATION  
(7) BY MR. WISENBERG:  
(8) Q Good morning. Could you state your name for the  
(9) record, please?  
(10) A My name is Leon Panetta.  
(11) Q And, Mr. Panetta, let me inform you -- my name is  
(12) Sol Wisenberg, first of all, and I'm here with my colleagues  
(13) from the Office of Independent Counsel, May Anne Wirth, Steve  
(14) Binhak, and Bruce Udolf, who you met out in the hall; is that  
(15) correct?  
(16) A That's correct.  
(17) Q And let me start by doing what we call advice of  
(18) rights and responsibilities about the grand jury. I'll ask  
(19) you -- tell you some things and occasionally ask you if you  
(20) understand what I'm saying.  
(21) And I'll also ask you that when I ask you those  
(22) things, if you can give us a yes or a no or a maybe --  
(23) A That's fine.  
(24) Q -- for the record. This is a federal grand jury  
(25)

## Page 4

(1) conducting an investigation of possible violations of federal  
(2) criminal laws involving possible perjury, obstruction of  
(3) justice, and subornation of perjury, and I'll read to you  
(4) from a portion of the order from the Special Division.  
(5) "The Independent Counsel shall have jurisdiction  
(6) and authority to investigate to the maximum extent authorized  
(7) by the Independent Counsel Reauthorization Act of 1994  
(8) whether Monica Lewinsky or others suborned perjury,  
(9) obstructed justice, intimidated witnesses, or otherwise  
(10) violated federal law, other than a Class B or Class C  
(11) misdemeanor or infraction, in dealing with witnesses,  
(12) potential witnesses, attorneys, or others concerning the  
(13) civil case, Jones v. Clinton.  
(14) So do you understand our authority in the matter?  
(15) A I do.  
(16) Q Of course, you have the privilege against self-  
(17) incrimination. And I understand you are an attorney?  
(18) A I am.  
(19) Q And you may refuse to answer any question if a  
(20) truthful answer to the question would tend to incriminate  
(21) you.  
(22) A I understand.  
(23) Q And you understand the privilege against self-  
(24) incrimination?  
(25) A Yes, I do.

## Page 5

(1) Q You understand that anything you do or say could be  
(2) used against you by the grand jury or in a subsequent legal  
(3) proceeding?  
(4) A Yes, I do.  
(5) Q If you have retained counsel, your counsel does not  
(6) have the right to sit with you in the grand jury room, but  
(7) the grand jury will permit you a reasonable opportunity to  
(8) step outside the grand jury room to consult with counsel if  
(9) you so desire. Do you understand that?  
(10) A I understand that. I am not represented by  
(11) counsel.  
(12) Q Okay. You came here by yourself today.  
(13) A That's correct.  
(14) Q All right. The grand jury is bound by certain  
(15) rules of secrecy covered in Rule 6(e) of the Federal Rules of  
(16) Criminal Procedure.  
(17) As a general matter, with certain exceptions,  
(18) myself, my colleagues, the grand jurors, the court reporter  
(19) are bound by an oath of secrecy. We can't go out and blab  
(20) what you've said here today. Do you understand?  
(21) A I understand.  
(22) Q You are not bound by that oath of secrecy. You can  
(23) go out, if you so choose, and tell the world about what you  
(24) said today. You don't have to, but you can. Do you  
(25) understand that?

## Page 6

(1) A I don't think so.  
(2) (Laughter)  
(3) Q That's fair.  
(4) A I understand.  
(5) Q Just an example of some of the exceptions. If  
(6) there were to ever be a trial arising out of anything this  
(7) grand jury did, and you were to testify differently than you  
(8) have here today, that would be an example where your grand  
(9) jury testimony could be revealed.  
(10) A I understand.  
(11) Q There are certain categories of witnesses who come  
(12) before a federal grand jury, known as subjects or targets,  
(13) and I'm going to read you the definition from the U.S.  
(14) Attorney's Manual of a target.  
(15) "A target is defined as a person as to whom the  
(16) prosecutor or the grand jury has substantial evidence linking  
(17) him or her to the commission of a crime, who, in the judgment  
(18) of the prosecutor, is a putative defendant."  
(19) You understand that definition?  
(20) A I do.  
(21) Q All right. You are not a target. Do you  
(22) understand that?  
(23) A I do.  
(24) Q A subject is defined as "A person whose conduct is  
(25) within the scope of the grand jury investigation." Do you

## Page 7

(1) understand that definition?  
(2) A I do.  
(3) Q You are technically, under the manual definition --  
(4) because that's such a broad definition, you would be a  
(5) subject. Do you understand that?  
(6) A I understand.  
(7) Q There is, as we've talked about, a more informal  
(8) division that's used by prosecutors and criminal defense  
(9) lawyers of witness/subject/target, where a subject might be  
(10) somebody in between a witness and a target.  
(11) A subject might be somebody about there's some  
(12) suspicion; whereas a witness is somebody who's just coming  
(13) giving information to the grand jury. Do you understand that  
(14) informal distinction?  
(15) A Yes, I do.  
(16) Q On that informal continuum of witness/subject/  
(17) target, you would be a witness. Do you understand that?  
(18) A I do.  
(19) Q You understand that those are not set in stone,  
(20) those categories; that we cannot guarantee that you will  
(21) never become a target.  
(22) A I understand.  
(23) Q This is an evolving investigation, and we have no  
(24) idea what we might find. You understand that.  
(25) A I understand.

## Page 8

[1] correct? Q You are here pursuant to a subpoena today; is that  
 [2] correct?  
 [3] A That's correct.  
 [4] Q Did that subpoena ask for any documents?  
 [5] A No, it did not.  
 [6] Q Let me also say that if at any time today I or my  
 [7] colleagues do not ask a question in a way that you can  
 [8] understand it -- and it will be shocking if that happened.  
 [9] But if there's anything ambiguous about any of our questions,  
 [10] that you please stop us and ask us to repeat it. Is that  
 [11] agreeable to you?  
 [12] A Yes, it is.  
 [13] Q All right. Do you understand your rights and  
 [14] responsibilities as I've read them to you?  
 [15] A Yes, I do.  
 [16] Q All right.  
 [17] A May I ask one question?  
 [18] Q Yes, sir.  
 [19] A With regards to issues of executive privilege, can  
 [20] you give me some guidance on that?  
 [21] Q We have not -- what I can tell you is, I'm unaware  
 [22] of any -- nobody from the White House has contacted us about  
 [23] any executive privilege issues regarding you, but I cannot --  
 [24] not working for the White House, I can't guarantee anything  
 [25] in that regard.

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[1] And if you need -- if you feel that you need to  
 [2] step outside and consult with anyone or call over there,  
 [3] we'll be happy to let you do so.  
 [4] A Well, if I feel that there's a question that may  
 [5] hinge on that, I'll at least raise that --  
 [6] Q Okay, all right.  
 [7] Q -- for purposes of discussion.  
 [8] Q How old are you, Mr. Panetta?  
 [9] A I'm 59.  
 [10] Q And where were you born?  
 [11] A I was born in Monterey, California.  
 [12] Q And can you tell us what your current occupation  
 [13] is?  
 [14] A My current occupation is -- I'm doing a number of  
 [15] things. I am a Distinguished Scholar at the California State  
 [16] University at Monterey Bay. I'm also a consultant to the  
 [17] Chancellor of the California State University System. I'm a  
 [18] Distinguished Scholar at Santa Clara University, doing  
 [19] teaching there.  
 [20] I am also a member of the Board of the U.S. Stock  
 [21] Exchange, and I'm a member of the Advisory Board of  
 [22] Fleischman-Hillard, which is a public relations firm.  
 [23] Those are my principal activities. I'm also doing  
 [24] public speaking.  
 [25] Q Is it fair you would identify yourself as a

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[1] politician?  
 [2] A After 30 years involved in politics, I think that's  
 [3] fair.  
 [4] Q You've had a career in politics, correct?  
 [5] A That's correct.  
 [6] Q Are you practicing law in the sense of --  
 [7] A I'm not practicing at the present time, but I am a  
 [8] member of the California Bar --  
 [9] Q Okay.  
 [10] A -- and have practiced.  
 [11] Q All right. You were a member of the Clinton  
 [12] Administration; is that correct?  
 [13] A That's correct.  
 [14] Q Can you tell us the dates, from when to when, you  
 [15] were in the Clinton Administration?  
 [16] A I was first appointed by the President, or  
 [17] nominated by the President to be Director of the Office of  
 [18] Management and Budget. That would have been soon after the  
 [19] election. I believe it was in early December that I was  
 [20] nominated for that position, and I was confirmed by the  
 [21] Senate, I believe, mid-January, just before the inauguration.  
 [22] Q That would be 1993?  
 [23] A That would have been in 19 -- January of '93.  
 [24] December of '92 that I was nominated, approved by the  
 [25] Senate -- confirmed by the Senate in January of '93, and I

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[1] served as Director of the Office of Management and Budget  
 [2] from approximately January through -- January of '93 through  
 [3] July of '94.  
 [4] I was --  
 [5] Q By the way, let me ask you, that's commonly known  
 [6] as OMB.  
 [7] A OMB.  
 [8] Q Okay. Carry on.  
 [9] A Office of Management and Budget. I was -- the  
 [10] announcement for my appointment to Chief of Staff to the  
 [11] President occurred on June 28th of 1994, and I actually  
 [12] occupied the position of Chief of Staff approximately around  
 [13] July 15th of '94 through January 20th of 1997.  
 [14] Q So it would be fair to say you've worked in the  
 [15] Clinton Administration from January of '93 to January of '97.  
 [16] A That's correct.  
 [17] Q And those are the two positions you've held,  
 [18] Director of the OMB and Chief of Staff.  
 [19] A That's correct.  
 [20] Q Before you were in the administration, you were a  
 [21] member of Congress?  
 [22] A I was elected from the 16th District in California,  
 [23] which is the central coast area of California, and my home  
 [24] area, and served in Congress for 16 years, eight terms. I  
 [25] think I was actually elected to my ninth term at the time

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[1] that I was nominated to be Director of the Office of  
 [2] Management and Budget.  
 [3] Q And you were chairman of a congressional committee,  
 [4] too, right?  
 [5] A I was Chairman of the House Budget Committee and  
 [6] also served on the House Agriculture Committee.  
 [7] Q How long have you known President Clinton?  
 [8] A I met the President when he was governor and came  
 [9] up to Capitol Hill to -- at the time I believe he was head of  
 [10] the Governors' Conference and was presenting issues related  
 [11] to education, and as Chairman of the House Budget Committee,  
 [12] I was asked by the leadership to attend a meeting in which he  
 [13] presented some issues related to education.  
 [14] And I believe I may have met him informally at  
 [15] other events on Capitol Hill.  
 [16] I did not know him that well and really did not  
 [17] develop any kind of personal relationship until I was  
 [18] nominated as Director of the Office of Management and Budget.  
 [19] Q He was governor for quite a bit of time, basically  
 [20] throughout the '80s, into the '90s. Do you recall --  
 [21] A This would have been late in his term.  
 [22] Q Okay, maybe late '80s or early '90s --  
 [23] A That's correct.  
 [24] Q -- when you would have -- you wouldn't have even  
 [25] met him till then?

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[1] A That's correct.  
 [2] Q Okay. So you were not a close friend at all until  
 [3] OMB, until you went to OMB.  
 [4] A That's correct.  
 [5] Q All right. Once you joined the administration as  
 [6] Director of OMB, then how would you characterize your  
 [7] relationship with him?  
 [8] A It was a professional relationship at that point.  
 [9] We were working almost immediately on the President's first  
 [10] economic plan, which he presented soon after he took office,  
 [11] and we actually began that process -- I believe we had an  
 [12] initial meeting in December in Little Rock, and then  
 [13] continued to have a series of meetings in Washington, both  
 [14] before and then after his inauguration, in which we worked  
 [15] through elements of the economic plan.  
 [16] And as Director of the Office of Management and  
 [17] Budget, I am responsible for overseeing the budget issues  
 [18] related to the administration, and in that capacity,  
 [19] obviously, would be called on by the President to advise him  
 [20] on budget decisions. And so it was that type of  
 [21] relationship. When I saw him, it was normally related to  
 [22] budget issues on various policies.  
 [23] Q Budget's always a big deal in any administration.  
 [24] Is that a fair statement?  
 [25] A That's a fair statement.

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[1] Q And there would be frequent interaction then  
 [2] between you and the President because of your role as  
 [3] Director of OMB.  
 [4] A That's correct.  
 [5] Q Would you consider yourself now, having served in  
 [6] the administration, both as Director of OMB and then as Chief  
 [7] of Staff, a friend or a close friend of the President?  
 [8] A I believe now, after serving, not only as Director  
 [9] of OMB, but, in particular, as Chief of Staff, I believe you  
 [10] could describe our relationship as being a friend of the  
 [11] President.  
 [12] Q By the way, where did you go to college and law  
 [13] school?  
 [14] A Went to college at the University of Santa Clara  
 [15] and also went there for law school. Graduated 1960 from  
 [16] undergraduate school, a political science major, and then  
 [17] graduated from law school in 1963, and then served in the  
 [18] Army for two years.  
 [19] Q When you were Chief of Staff, can you just give us  
 [20] a nutshell definition of what you would describe as your  
 [21] duties as the Chief of Staff of the President of the United  
 [22] States?  
 [23] A As you can imagine, the responsibilities of a chief  
 [24] of staff are very large and very encompassing, but these  
 [25] are -- the primary roles that I had were as follows as Chief

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[1] of Staff:  
 [2] Number one, to organize the White House staff. I  
 [3] think I was asked to be Chief of Staff largely to try to  
 [4] bring some sense of organization and discipline to the White  
 [5] House staff. So, first and foremost, organize the White  
 [6] House staff and provide a chain of command and discipline.  
 [7] Secondly, oversee the staff, basically coordinate  
 [8] the staff so that it would serve the President of the United  
 [9] States.  
 [10] Thirdly, oversee the development of policy for the  
 [11] President, both on domestic and foreign affairs issues, and  
 [12] ensure that whatever briefings the President needs, that they  
 [13] are properly developed for presentation to the President.  
 [14] I was, as a member of Congress, largely involved in  
 [15] congressional relations as well, so that I would deal with  
 [16] both the congressional leadership and members of Congress  
 [17] who, because of my association with them, would often call me  
 [18] on various issues. So I did a lot of congressional relations  
 [19] work in that capacity.  
 [20] Also, having been Director of the Office of  
 [21] Management and Budget and Chairman of the House Budget  
 [22] Committee, I was very involved on budget issues during that  
 [23] period of time, and so advised the President on many of the  
 [24] budget issues that he was presented with.  
 [25] I was also responsible for overseeing his schedule,

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[1] to set up a schedule for the President, and work with the  
 [2] schedulers in making final decisions on that, and the  
 [3] President.  
 [4] And then, lastly, I would periodically travel with  
 [5] the President. One of the things I wanted to do was to  
 [6] ensure that someone from the Chief of Staff's Office, either  
 [7] myself or a Deputy Chief of Staff, would accompany the  
 [8] President on trips and control the trip. And I would  
 [9] periodically do that, but my deputies would also have that  
 [10] responsibility.  
 [11] So that, in a nutshell, were some of the  
 [12] responsibilities that I had as Chief of Staff.  
 [13] Q I want to focus on the first part of your answer.  
 [14] You said that one of the things you were brought in to -- I'm  
 [15] not quoting you exactly, but to improve, perhaps,  
 [16] organization and discipline and the chain of command.  
 [17] Was there a feeling that there had been  
 [18] insufficient attention to those issues under your  
 [19] predecessor?  
 [20] A When the President asked me to become Chief of  
 [21] Staff --  
 [22] Q Pardon me must a minute.  
 [23] MR. WISENBERG: Let the record reflect that  
 [24] somebody opened the door and then closed it.  
 [25]

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[1] BY MR. WISENBERG:  
 [2] Q Carry on.  
 [3] A When the President asked me to become Chief of  
 [4] Staff, he expressed concern about the operations of the White  
 [5] House and that the operations, he felt, were not sufficiently  
 [6] disciplined or organized to serve him in the most efficient  
 [7] way, and that one of the first requirements he asked me to do  
 [8] was to try to organize the White House staff in a way that  
 [9] would be much more disciplined and much more efficient in  
 [10] serving him.  
 [11] Q What do you mean by -- well, would this include, in  
 [12] addition to just efficiency, such as getting the job done,  
 [13] was there a feeling in a physical sense that too many people  
 [14] were going in and out and too many people had access to him?  
 [15] A There were several areas of concern. One was that  
 [16] there was -- for lack of a better term, there was not  
 [17] sufficient discipline. People would wander through the  
 [18] offices in the West Wing. They would go into the Oval Office  
 [19] or into the exterior of the Oval Office without oftentimes  
 [20] any particular appointment.  
 [21] There were a number of generalists. By that I mean  
 [22] individuals that had no particular defined role other than  
 [23] kind of walking into meetings and giving opinions, and,  
 [24] therefore, there was a lack of individuals who carried a  
 [25] specific job description or responsibility.

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[1] Q That sounds like a good job, by the way, to have  
 [2] opinions and walk into meetings.  
 [3] A There's nothing like being a generalist in  
 [4] politics.  
 [5] (Laughter)  
 [6] Q I'm sorry. Carry on.  
 [7] A And then, thirdly, the briefings for the President  
 [8] would oftentimes turn into long meetings because they were  
 [9] not properly controlled or they were not properly prepared.  
 [10] And so oftentimes discussions on issues, instead of being  
 [11] limited to a period of time pursuant to a schedule, could  
 [12] often drag on for an hour or even two hours. And there was  
 [13] concern about that as well.  
 [14] So when I became Chief of Staff, there were really  
 [15] three areas that I focused on: One was to improve discipline  
 [16] within the institution, and by that, make very clear that  
 [17] people would not simply be able to walk through the West Wing  
 [18] without having some kind of specific role.  
 [19] That briefings would normally come through my  
 [20] office so that they would present the briefings to me, and I  
 [21] was assured that the briefings were well-prepared and  
 [22] presented options to the President.  
 [23] Thirdly, I provided a chain of command so that  
 [24] people knew who they were responsible to. I created two  
 [25] Deputy Chiefs of Staff, one responsible for the political

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[1] arena as well as some policy areas, and the second Deputy  
 [2] Chief of Staff responsible for personnel and scheduling and  
 [3] responsibilities under that. So that everybody knew who they  
 [4] would report to.  
 [5] And then, lastly, a created a greater focus for the  
 [6] President so that when he wanted to deal with a particular  
 [7] issue, he was not doing a number of events that --  
 [8] MR. WISENBERG: Let the record reflect that someone  
 [9] opened the door and closed it right away. Mr. Udolf is going  
 [10] to investigate.  
 [11] BY MR. WISENBERG:  
 [12] Q Carry on.  
 [13] A This was a little more of the White House you saw.  
 [14] (Laughter)  
 [15] And we used to -- and we would create a focus then  
 [16] on trying to ensure that if the President was going to do a  
 [17] part event, that that would be the event of the day, as  
 [18] opposed to having a number of events and therefore not  
 [19] present a clear message to the American people.  
 [20] Those were really the primary areas that I was  
 [21] involved in.  
 [22] Q You mentioned people wandering around in and out of  
 [23] offices in the West Wing. What do you recall specifically  
 [24] doing -- what, if anything, to restrict access in the West  
 [25] Wing?

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[1] A I mean, the most important thing was that I had  
 [2] made sure that no one should just wander down to the Oval  
 [3] Office unless a staff member was associated with a particular  
 [4] briefing. Or if, you know, we were doing something on a  
 [5] policy issue, I normally indicated who -- what individuals  
 [6] ought to go in on a policy briefing to the President.  
 [7] So that if he was having a policy briefing, I would  
 [8] normally provide clearance as to who would go in for the  
 [9] policy briefing. Or if the President was meeting with staff  
 [10] or if the President was having an event, I would normally  
 [11] review who would be there for a particular event.  
 [12] And then when we would brief the President on -- or  
 [13] sometimes prepare the President for an event, I would  
 [14] determine who would go in with me to brief the President  
 [15] before an event.  
 [16] Q I guess if you don't have a system like that, it's  
 [17] kind of natural for --  
 [18] MR. WISENBERG: Let the record reflect that Mr.  
 [19] Udolf as re-entered the room alone.  
 [20] BY MR. WISENBERG:  
 [21] Q I guess if you don't have a system like that, it's  
 [22] natural for people to want to be seen with the President or  
 [23] want to get in meetings with the President.  
 [24] A You know, obviously, people that work at the White  
 [25] House, I think it's a natural instinct to want to try to

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[1] either see or be with the President as often as you can,  
 [2] because that's one of the -- I think one of the rewards of  
 [3] working in the White House, is to have that kind of  
 [4] opportunity.  
 [5] But I wanted to, as Chief of Staff, assure that  
 [6] people met with the President if they had a responsibility to  
 [7] meet with him related to a particular issue.  
 [8] Q Are you saying -- well, like, before you came,  
 [9] basically, there were any number of people who worked there  
 [10] in policy positions who felt they could just walk in and talk  
 [11] to the President about a particular issue?  
 [12] A I was not located physically in the White House.  
 [13] As Director of the Office of Management and Budget, my office  
 [14] is over at the old Executive Office Building, which adjoins  
 [15] the White House. So there was a geographical separation from  
 [16] the White House.  
 [17] But one of the concerns that was raised with me  
 [18] when I took over Chief of Staff was the concern about  
 [19] individuals who would walk in without any appointment and try  
 [20] to see the President.  
 [21] Q And, I take it, that wasn't a security concern, it  
 [22] was a job efficiency concern.  
 [23] A That's correct.  
 [24] Q And those were raised with you by the President  
 [25] himself --

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[1] A That's correct.  
 [2] Q -- when he was telling you what he wanted you to  
 [3] accomplish as Chief of Staff?  
 [4] A That's correct.  
 [5] Q By the way, those two deputies you mentioned, the  
 [6] policy and the personnel --  
 [7] A Yes.  
 [8] Q -- who were those people?  
 [9] A When I first became Chief of Staff, Harold Ickes  
 [10] was given the responsibility to handle the political  
 [11] operations, plus some policy areas, to oversee some policy  
 [12] areas.  
 [13] The Deputy Chief of Staff for Personnel and  
 [14] Scheduling was Erskine Bowles at that time. Then when Mr.  
 [15] Bowles left, he was replaced by Evelyn Lieberman, who became  
 [16] Deputy Chief of Staff for Personnel and Scheduling.  
 [17] Q How did you get your job at the OMB? How does one  
 [18] go about doing that? I mean, did you --  
 [19] A I did not seek it, and I did not -- I did not  
 [20] request --  
 [21] Q Pardon me.  
 [22] MR. WISENBERG: Did that happen again?  
 [23] THE FOREPERSON: It almost did, but no one opened  
 [24] the door.  
 [25] MR. WISENBERG:

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[1] Q Pardon me, go ahead.  
 [2] A I did not -- I had just been reelected to the  
 [3] Congress and would have been Chairman of the House Budget  
 [4] Committee for that next term, so I did not seek the office of  
 [5] Director of OMB. But, obviously, at the time the President  
 [6] first came in, he had representatives from -- as President-  
 [7] elect talked to me about economic issues that would face the  
 [8] new administration and asked for my recommendations as to  
 [9] individuals to be in certain key economic positions.  
 [10] I did not recommend myself. But later on I was  
 [11] asked by Mr. Christopher, who headed up the re-elect team --  
 [12] Q That would be Warren Christopher?  
 [13] A Warren Christopher.  
 [14] Q Who became Secretary of State in the first one.  
 [15] A That's correct.  
 [16] Q He then communicated with me that the President was  
 [17] interested in interviewing me for that possible position of  
 [18] Director of the Office of Management and Budget.  
 [19] Q The people who would talk to you and ask you both  
 [20] about economic issues and your recommendations, who were  
 [21] they, if you recall?  
 [22] A I was first visited by Robert Reich, who came in  
 [23] and just generally asked me about issues related to the  
 [24] economy, what do to on the budget, what steps to take, what  
 [25] my recommendations were, kind of a general overview of

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[1] economic issues.  
 [2] And then after that, I think it was Mr. Christopher  
 [3] who came by and asked -- asked the same questions, but then  
 [4] asked more about personnel, who would be my recommendation  
 [5] for Secretary of the Treasury, who would be my recommendation  
 [6] for Director of OMB, who would be my recommendation for other  
 [7] economic positions within the administration.  
 [8] Q Anybody else other than Mr. Christopher and Mr.  
 [9] Reich?  
 [10] A Those are the only ones I can recall. I believe I  
 [11] may have had some phone conversations with Gene Spurling, who  
 [12] had headed up some of the economic issues during the  
 [13] campaign.  
 [14] Q After you heard your name floated, did you go in  
 [15] for interviews with anybody?  
 [16] A The President. The call came from Mr. Christopher  
 [17] that the President wanted to talk with me, and that -- I was  
 [18] asked to go to Little Rock to sit down with the President.  
 [19] And I did that and was taken to the governor's  
 [20] mansion and was interviewed by the President for well over an  
 [21] hour. We talked economic issues and --  
 [22] Q One-on-one interview?  
 [23] A Yes.  
 [24] Q And did you interview with anyone else down there  
 [25] before you went in to see the President?

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[1] A No, not that I can recall.  
 [2] Q And when you moved from OMB to Chief of Staff, was  
 [3] that also something that you were called to by others, that  
 [4] you weren't seeking yourself?  
 [5] A That's correct. I did not -- I frankly did not  
 [6] want to become Chief of Staff. I liked my position as  
 [7] Director of the Office of Management and Budget. We had  
 [8] passed the economic plan. I felt very good about my  
 [9] stewardship at the Office of Management and Budget. I felt I  
 [10] had a good team, and that I was serving the President well in  
 [11] that position, and so stated to the President.  
 [12] I said, essentially, to the President that I felt I  
 [13] would be more valuable to remain as Director of the Office of  
 [14] Management and Budget than to become Chief of Staff.  
 [15] Q And what was his response?  
 [16] A His response, essentially, was, "You can be the  
 [17] greatest Director of the Office of Management and Budget in  
 [18] the world, but if the White House is falling apart, nobody's  
 [19] going to remember you."  
 [20] Q You mentioned that one of the things, in addition  
 [21] to organization, discipline, and chain of command, that were  
 [22] needed to be done by the Chief of Staff, you mentioned that  
 [23] you wanted yourself or one of your people to accompany the  
 [24] President on all the trips. Tell us why.  
 [25] A Well, again, one of the concerns that had been

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1) raised is that there was no obvious trip director on each of  
 2) the trips that the President had taken prior to my becoming  
 3) Chief of Staff, and that sometimes it would vary, but there  
 4) was no clear leadership on a trip.  
 5) In addition to that, people would often go on the  
 6) trips that were not cleared in any manner, so that oftentimes  
 7) people would accompany the President that had no particular  
 8) policy purpose for being on the trip.  
 9) And so I did two things. Number one, I wanted to  
 10) make sure that whoever was there, either myself as Chief of  
 11) Staff, or a Deputy Chief of Staff, was recognized as the key  
 12) trip director. And, therefore, if there were questions of  
 13) policy or personnel, that that person could be turned to for  
 14) decisions.  
 15) And, secondly, we would look at who would go on a  
 16) particular trip and make decisions about who would accompany  
 17) the President.  
 18) Q When you say "we," that would be you and your  
 19) deputies?  
 20) A Myself and the deputies, that's correct.  
 21) Q Was there anybody else you ever became aware of in  
 22) addition to the President who was pushing for you to become  
 23) Chief of Staff so that you could bring this discipline that  
 24) apparently was needed?  
 25) A The Vice President is a friend that -- someone I

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1) have known for a long time. We were elected to Congress the  
 2) same year, in 1976. And it was the Vice President who  
 3) actually came to me and said that the President was  
 4) interested in talking with me about being Chief of Staff.  
 5) And I told the Vice President at that time that I was not  
 6) interested, but he continue to push.  
 7) Q Anybody else who was pushing, directly or  
 8) indirectly, for you?  
 9) A You have the President and the Vice President, you  
 10) don't many others. I don't know. I don't know. I think  
 11) that Mac McLarty, my predecessor, often talked to me -- or  
 12) asked me for my recommendations as to how to improve the  
 13) operations of the White House, and I would give him that  
 14) guidance.  
 15) Q What were your typical hours when you were Chief of  
 16) Staff?  
 17) A Obviously, in a position like that, depending on  
 18) the President's schedule, the hours could vary a great deal.  
 19) But to give you a typical example of what might be called a  
 20) typical day, if there's such a thing in the White House,  
 21) normally I would arrive at the office a little after 7:00,  
 22) between 7:00 and 7:30, would try to read the morning  
 23) newspapers and prepare for the staff meetings that I  
 24) initiated as Chief of Staff.  
 25) The first staff meeting was at 7:30, and then it

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1) was followed by a broader staff meeting at 8:15.  
 2) Normally, after those staff meetings, I would meet  
 3) with the President. There would be events that the President  
 4) would have that would involve briefings. We did try to set  
 5) aside for the President what was called phone-in office time,  
 6) normally between 12:00 and 3:00, but sometimes that worked,  
 7) sometimes it didn't, but we did try to initiate for the  
 8) President a period of time when he could deal with letters  
 9) and memos and notes and make the calls that he needed to  
 10) make.  
 11) There might be additional briefings later in the  
 12) afternoon, and sometimes receptions in the evening. If there  
 13) was a political meeting during -- as we had during the  
 14) campaign, sometimes I wouldn't get home till 12:00 or 12:30  
 15) that evening.  
 16) Normally, I think, around 8:30 or 9:00, I might be  
 17) able to leave. So a normal day would run somewhere between  
 18) 7:00 to about 9:00, 10:00 in the evening.  
 19) But I should also tell you that, as Chief of Staff,  
 20) you also continue to get calls from either the President or  
 21) from policy people that could sometimes go into the evening,  
 22) and if there's a particular event that takes place, then the  
 23) Secret Service will call you in the middle of the night.  
 24) So it's a 24-hour job.  
 25) Q How many times would you -- what do you define as

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1) the middle of the night, after midnight?  
 2) A I remember getting a -- I mean, the first call I  
 3) got as Chief of Staff was about 2:30 in the morning, and it  
 4) came from a Secret Service agent who told me that a plane had  
 5) gone into the White House.  
 6) Q If you can recall, how many times -- I don't expect  
 7) an exact number, but how many times when you were Chief of  
 8) Staff would you get a call from the President waking you up,  
 9) the President personally waking you up?  
 10) A How many times?  
 11) Q Yes.  
 12) A It was a number of times. I can't give you an  
 13) estimate. I mean, I just, you know, it -- it would happen a  
 14) number of times.  
 15) Q Can we say less than 50? Is that -- do you feel  
 16) comfortable with that?  
 17) A During the time I was Chief of Staff?  
 18) Q Yes. I mean, if we could do it like 25, 50,  
 19) understanding that you're not --  
 20) A Somewhere between 25 and 50, I guess, but, again,  
 21) that's an estimate. I don't recall, you know --  
 22) Q In a typical month -- again, we're not holding you.  
 23) We know there's no way you can remember exactly. In a  
 24) typical month, how many times would you get awakened by a  
 25) call from the President, as Chief of Staff?

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1) A In a typical month?  
 2) Q Yes.  
 3) A Sometimes maybe ten, ten times.  
 4) Q Would that be typical or unusual?  
 5) A It varied. I'm just -- I'm giving you, I guess, my  
 6) best estimate of, you know -- and, again, sometimes it would  
 7) be -- you know, if I went home and went to bed at 11:00,  
 8) 11:30 -- you're usually exhausted in these jobs, so normally  
 9) when I got home, I would try to get to bed, and then perhaps  
 10) soon after that, I might get a call from the President.  
 11) Q By the way, it's very hot in here, and I'm sure the  
 12) grand jury if you wanted to take your coat. I'm probably  
 13) going to take mine off soon.  
 14) About how many people did you supervise as Chief of  
 15) Staff?  
 16) A Well, the primary supervision, again, was, you  
 17) know, with the deputies, but if you look at the key  
 18) presidential personnel in the White House, obviously, that  
 19) would number, I would estimate, somewhere close to 20. But  
 20) then, obviously, you have the responsibility to oversee all  
 21) of the White House staff, which can total a few hundred.  
 22) Q And when you say total White House staff, you would  
 23) be the ultimate person in control, I guess, next to the  
 24) President himself.  
 25) A That's correct.

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1) Q And when you say total White House staff, would  
 2) that include -- are you not including people in the Old  
 3) Executive Office Building?  
 4) I'm just trying to see if "White House staff" is a  
 5) term of art. You know, does that mean Executive Office of  
 6) the President?  
 7) A Well, I think, yeah, you do have to break this down  
 8) so that you understand. I mean, my day-to-day contact was  
 9) with a limited group of White House staff that had key  
 10) responsibilities. That was -- and that was usually handled  
 11) at the 7:30 meeting and at the 8:15 broader staff meeting.  
 12) But then there are obviously a large number of  
 13) people under those individuals, both in the White House as  
 14) well as the Old Executive Office Building, who ultimately you  
 15) could say as Chief of Staff I am responsible for, but  
 16) obviously did not deal with on a day-to-day basis.  
 17) Q Okay. And that number of 200, is that meant to be  
 18) inclusive? What I'm asking you about is ultimate chain of  
 19) command. In other words, if a decision has to be made to  
 20) reward, discipline, transfer the people you have ultimate  
 21) line authority over -- you mentioned a figure of 200. Was it  
 22) potentially even larger?  
 23) A Yes, yes.  
 24) Q Do you include in OEB and --  
 25) A I think it goes up pretty high. I can't remember

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[1] the exact -- I think the overall number I recall in terms  
 [2] overall staff was, you know, almost 5,000 or 6,000, I  
 [3] believe.  
 [4] Q In the White House itself you think it's roughly a  
 [5] couple of hundred?  
 [6] A I think that's correct.  
 [7] (Grand Jury Exhibit No. LP-1 was  
 [8] marked for identification.)  
 [9] BY MR. WISENBERG:  
 [10] Q I've put in front of you what we've marked as Grand  
 [11] Jury Exhibit LP-1. Do you have that in front of you?  
 [12] A Yes, I do.  
 [13] Q The grand jurors have copies. This has been given  
 [14] to us and is a purported diagram of the first floor, I  
 [15] believe, of the West Wing. And what I'd like you to do is --  
 [16] if you don't have a pen, we can lend you a pen --  
 [17] A I've got a pen.  
 [18] Q And I'm going to ask you to help us determine, to  
 [19] the best of your memory, what some rooms are. Is that okay?  
 [20] A Yes.  
 [21] Q We have at kind of the center, at the bottom, the  
 [22] Oval Office; is that correct?  
 [23] A That's correct. It states, "Oval Office."  
 [24] Q That's how I knew. And it's also oval-shaped.  
 [25] That's where the President conducts most of his

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[1] A My recollection is that they're doors with a knob  
 [2] that you can close, normal doors.  
 [3] Q All right. Let's name these so that the record's  
 [4] clear. I'd like you to mark the long walkway to the left of  
 [5] the -- what I'll call the eagle right now, if you could mark  
 [6] that as Walkway 1. You would agree with me that that's a  
 [7] long walkway.  
 [8] A This is a long walkway.  
 [9] Q Okay. That would be this walkway here, this long  
 [10] one, we're going to mark as Walkway 1.  
 [11] (The witness marked the document.)  
 [12] BY MR. WISENBERG:  
 [13] Q And the area enclosed -- that you've identified as  
 [14] enclosed by doors that we've called the eagle and the map,  
 [15] I'd like you to mark that as Walkway 2.  
 [16] (The witness marked the document.)  
 [17] BY MR. WISENBERG:  
 [18] Q Now, the Walkway 2 area, in turn, goes into --  
 [19] well, it goes into the Roosevelt Room, it goes into the Oval  
 [20] Office, or it gets you access to the Roosevelt Room and  
 [21] access to the Oval Office; is that correct?  
 [22] A That's correct.  
 [23] Q Are those --  
 [24] A Those doors are normally closed.  
 [25] Q Those doors are normally closed.

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[1] business when he's in the White House?  
 [2] A That's correct. The President, and this  
 [3] President -- it's probably varied throughout history, but  
 [4] this President did much of his work in that office, the Oval  
 [5] Office, at his desk.  
 [6] Q Now, you see the little room, or odd-shaped --  
 [7] almost like a map of the United States up in the left corner?  
 [8] A Yes.  
 [9] Q What is that room? Or what is that thing? It's  
 [10] not a room.  
 [11] A This area here (indicating)?  
 [12] Q Yes. Is that a room or a walkway or --  
 [13] A That actually is a walkway. It gives the  
 [14] appearance of being a room, but if you look at that hallway  
 [15] that appears to the left of what you indicated, this is  
 [16] really a continual walkway that goes through here  
 [17] (indicating) and -- I'm not quite sure how this -- oh, okay.  
 [18] Yeah, the walkway would go like this through here  
 [19] (indicating), and then this would actually be the entrance to  
 [20] the reception area and to the Oval Office.  
 [21] Q Okay. You have drawn with a blue pen that we've  
 [22] lent you an arrow leading from -- to the left of what I've  
 [23] identified as the shape on our map that looks kind of like  
 [24] a --  
 [25] A Crossword puzzle.

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[1] Q Yeah, perverted map of the U.S., you know, with a  
 [2] unicorn on the top.  
 [3] A Right.  
 [4] Q It's actually -- it's about --  
 [5] A It's about -- if you look at the Oval Office, it's  
 [6] about at 11:00, if you were looking at a clock, and at (11:00)  
 [7] is that symbol, and that really -- this kind of distorts it,  
 [8] because I think those are the doors that open up in each --  
 [9] into these different areas, or gives the impression that it's  
 [10] an enclosure. It's not an enclosure, it's basically a  
 [11] continuous walkway that goes through there, and those doors  
 [12] are normally left open.  
 [13] Q Pardon me just a moment.  
 [14] I want to make sure I understood. The little arrow  
 [15] that we've called a map that looks like -- somebody said it  
 [16] looks like a bird --  
 [17] A JUROR: It does look like a bird.  
 [18] BY MR. WISENBERG:  
 [19] Q -- with its wings open, that is actually also a  
 [20] walkway area. It's just that there are doors -- it's  
 [21] enclosed on all these sides by doors.  
 [22] A And those doors are normally open. I rarely saw  
 [23] those doors closed.  
 [24] Q And are those like doors that you could just push  
 [25] open, or are they like doors with a knob that you open?

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[1] A That's right.  
 [2] Q Okay.  
 [3] A The Roosevelt Room door is closed and the door  
 [4] the Oval Office is closed.  
 [5] Q Do you know whether or not they're typically locked  
 [6] or just closed?  
 [7] A My recollection is that the door to the Roosevelt  
 [8] Room is normally not locked, so that if you wanted to access  
 [9] the Roosevelt Room, you could just turn the handle and walk  
 [10] in. But that access to the Oval Office is locked.  
 [11] Q Now, there's also -- Walkway 2 gives you direct  
 [12] access to Walkway 1, correct?  
 [13] A That's right.  
 [14] Q And then it goes up to a room that's not labeled,  
 [15] or perhaps to another walkway that's not labeled. What is  
 [16] that area, if you know?  
 [17] A That area there, which is, again, located -- if  
 [18] you're in Walkway 2, it would be the upper right -- it looks  
 [19] like a door or -- I'm not quite sure how to define this. But  
 [20] it would be that -- on the right-hand side of that symbol  
 [21] that we described --  
 [22] Q Walkway 2.  
 [23] A -- of Walkway 2. That leads to an area that is  
 [24] usually and can be used as a waiting area for those who  
 [25] either are visiting with the President, or if it's a cabinet

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[1] room meeting, sometimes staff will assemble there before they  
 [2] go into the cabinet room. There are some chairs in that room  
 [3] for seating.  
 [4] And it can also be used as a continual walkway that  
 [5] leads to -- back to the lobby of the White House, or if you  
 [6] continue to follow that, will ultimately lead to where the  
 [7] press is located.  
 [8] Q All right. Why don't we designate that as Waiting  
 [9] Area 1?  
 [10] (The witness marked the document.)  
 [11] MR. WISENBERG: Does everybody know where we  
 [12] A JUROR: Almost. Yes, okay.  
 [13] BY MR. WISENBERG:  
 [14] Q Now, you mentioned the lobby. We can see the  
 [15] lobby. That's marked. I take it the area between Waiting  
 [16] Area 1 -- we've called Waiting Area 1 and the lobby is yet  
 [17] another walkway.  
 [18] A That's correct.  
 [19] Q All right. Let's call that Walkway 3.  
 [20] MR. WISENBERG: We all know where that is?  
 [21] THE WITNESS: That's the area that's just north of  
 [22] the Roosevelt Room. There's a walkway there. That would  
 [23] be -- what are we going to describe that as?  
 [24] BY MR. WISENBERG:  
 [25] Q Walkway 3.

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[1] A [REDACTED]?  
 [2] (The witness marked the document.)  
 [3] BY MR. WISENBERG:  
 [4] Q Are the doors between [REDACTED] and [REDACTED]  
 [5] typically kept open?  
 [6] A The door that leads from the waiting area to  
 [7] Walkway [REDACTED] is normally open. The door that leads from Walkway  
 [8] [REDACTED] to the lobby is normally closed.  
 [9] Q And how about the Roosevelt Room, the door from  
 [10] Walkway [REDACTED] to the Roosevelt Room?  
 [11] A From Walkway [REDACTED] to the Roosevelt Room, I have to say  
 [12] that that door is normally [REDACTED], because there are meetings  
 [13] that are going on in the Roosevelt Room, so it generally is  
 [14] [REDACTED]. Both the access from Walkway [REDACTED] - I think it's fair  
 [15] to say that the doors leading to the Roosevelt Room normally  
 [16] are [REDACTED].  
 [17] Q You mentioned that Waiting Area [REDACTED] also leads, if  
 [18] you go straight ahead, to the press room; is that correct?  
 [19] A That's correct.  
 [20] Q If you'll look just to the north of Waiting Area [REDACTED],  
 [21] what is that next area?  
 [22] A The area next to Waiting Area No. [REDACTED] is an area that  
 [23] I would call another walkway. You'll notice stairs there to  
 [24] the right, a series of lines there. That's a stairwell, and  
 [25] that stairwell leads downstairs to the lower level of the

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[1] White House if you go down those stairs.  
 [2] If you continue to go around, you will - there's  
 [3] normally - there's a little area there where there's a  
 [4] [REDACTED], one of the Secret Service's [REDACTED]  
 [5] that are located at a [REDACTED] there, and that is just in that  
 [6] little area to the north of that area we were discussing.  
 [7] Q All right. Let's, first of all, call this area -  
 [8] I'd like you to mark this area just north of Waiting Area [REDACTED] -  
 [9] - everybody know where that is? - as Walkway [REDACTED].  
 [10] (The witness marked the document.)  
 [11] BY MR. WISENBERG:  
 [12] Q And, I take it, the door leading from Walkway [REDACTED] to  
 [13] the cabinet room is typically [REDACTED]?  
 [14] A [REDACTED]. I've rarely seen that door [REDACTED]. I think  
 [15] that it's only [REDACTED] if there's some kind of emergency.  
 [16] I've never seen that door used.  
 [17] Q Now, the officer that you mentioned - or Secret  
 [18] Service person -  
 [19] A Actually, I apologize. That door is used when the  
 [20] press is brought into the cabinet room for a photo  
 [21] opportunity with whoever is visiting the President in the  
 [22] cabinet room. Normally the press is brought in through that  
 [23] door.  
 [24] Q All right. Otherwise it's typically [REDACTED]?  
 [25] A That's correct.

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[1] Q That's the door from Walkway [REDACTED] to the cabinet room,  
 [2] correct?  
 [3] A That's right.  
 [4] Q You mentioned a [REDACTED] person or an [REDACTED]  
 [5] of some kind.  
 [6] A That's correct.  
 [7] Q Is that in that first little left box up and to the  
 [8] right of Walkway [REDACTED]?  
 [9] A That's right. If you follow Walkway [REDACTED] into that  
 [10] little box that has kind of a [REDACTED] shape there, just to the  
 [11] right of where that [REDACTED] is located normally is a desk that has  
 [12] a police officer located at.  
 [13] Q That would be in this little area up on top of  
 [14] Walkway [REDACTED]. Can you tell us where - and let's just call that  
 [15] Desk [REDACTED], if you could mark that as Desk [REDACTED].  
 [16] (The witness marked the document.)  
 [17] BY MR. WISENBERG:  
 [18] Q And can I ask you to tell us where your office -  
 [19] where the Chief of Staff's Office was?  
 [20] A Yes. If you go back down Walkway No. 1 to what is  
 [21] Room [REDACTED], that is the Chief of Staff's Office.  
 [22] Q And that's where you were, correct?  
 [23] A That's correct.  
 [24] Q Can you tell us, if you know, where the stewards  
 [25] who heat up the President's meals or serve coffee and

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[1] whatnot, where their pantry is, where their area is?  
 [2] A Yes. If you - if you go down Walkway [REDACTED], the  
 [3] pantry area is located where that [REDACTED] door that enters the  
 [4] Roosevelt Room is. It would be directly opposite that door  
 [5] in Walkway [REDACTED].  
 [6] Q All right. It's not actually designated on the map  
 [7] then.  
 [8] A That's correct.  
 [9] Q Okay. So the door that leads from Walkway [REDACTED] into  
 [10] the Roosevelt Room, it would be opposite that, but it doesn't  
 [11] have its own area designated on the map.  
 [12] A That's correct. But the pantry - let me try to  
 [13] get my - I'm trying to locate the President's dining room,  
 [14] because the pantry is located - and adjoins the President's  
 [15] dining area.  
 [16] Q Would this little thing mean anything to you, this  
 [17] little square (indicating)?  
 [18] A Yes. Where this door is that enters what's called  
 [19] the Oval Office Complex on this map, that is the President's  
 [20] dining area. So the pantry is actually off of that Oval  
 [21] Office Complex, actually in the upper right-hand corner, so  
 [22] - my geography's a little off here. It would actually be a  
 [23] little further down Walkway [REDACTED].  
 [24] Q All right. So you're not sure exactly on the map  
 [25] where the pantry is, or even if it's designated on the map?

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[1] A The pantry is not designated on the map, but my  
 [2] best recollection is that the pantry is located off - in the  
 [3] upper right-hand corner of what is called the Oval Office  
 [4] Complex.  
 [5] Q All right. So the presidential dining room is in  
 [6] the Oval Office Complex?  
 [7] A That's correct.  
 [8] Q It's not necessarily the entire thing, but it's  
 [9] within it. The dining room is within the Oval Office  
 [10] Complex.  
 [11] A There is - in that room called the Oval Office  
 [12] Complex there is a dining room table -  
 [13] Q Okay.  
 [14] A - that's used by the President for dining with  
 [15] visitors, and it's oftentimes used to brief the President,  
 [16] and the table is used for papers of those that are briefing  
 [17] the President. And if he's working on a statement or on a  
 [18] speech, he will use that room to work on that table to  
 [19] sometimes rewrite speeches.  
 [20] Q All right. If you could just write above "Oval  
 [21] Office Complex," write "Dining Room."  
 [22] (The witness marked the document.)  
 [23] BY MR. WISENBERG:  
 [24] Q Is that door between Walkway [REDACTED] and Oval Office  
 [25] generally kept open or [REDACTED]? I'm sorry, strike that.

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[1] The doorway between Walkway [REDACTED] and the Oval Office  
 [2] Complex where the dining room is, is that typically open or  
 [3] closed?  
 [4] A That's [REDACTED], and it's [REDACTED] with a security lock  
 [5] in which it can only be opened if [REDACTED]  
 [6] [REDACTED].  
 [7] Q All right. You're not comfortable - for now we'll  
 [8] just keep it on the issue of the pantry. It's the upper  
 [9] right-hand corner of what you've designated as Oval Office  
 [10] Complex. You don't know for sure if it's that little space  
 [11] designated on the upper right most portion?  
 [12] A I believe in - I'm pretty sure that in the middle  
 [13] of that dining room at the top, that is a fireplace that is  
 [14] encompassed there. It looks like a fireplace in the middle  
 [15] of the room. The pantry would be to the right of that area.  
 [16] It looks like that white area there that has a door  
 [17] would take you into the pantry. I'm sure of that.  
 [18] Q Okay. Why don't we put an "F" where you think the  
 [19] fireplace is and a "P" if you can fit it in.  
 [20] (The witness marked the document.)  
 [21] BY MR. WISENBERG:  
 [22] Q Well, okay, let me - are you saying the area -  
 [23] you have marked an area "F" right at the top of the dining  
 [24] room. You think that's the fireplace?  
 [25] A That's correct.

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Q All right. Then to the right of that is what you think is a doorway that leads into the pantry.  
 A That's correct.  
 Q Okay. Why don't we put a "PD" for pantry door? And if you need to an arrow there from somewhere else, you can.  
 (The witness marked the document.)  
 MR. WISENBERG: "F" is the top of the Oval Office Complex room, the top white is the fireplace, and to the right is "PD" for pantry door.  
 A JUROR: Okay.  
 BY MR. WISENBERG:  
 Q And the dining room is within the Oval Office -- what's been designated as the Oval Office Complex.  
 Can you tell us who is in -- you've mentioned in Waiting Area 1 there are chairs there. Is there typically a secretary of any kind in Waiting Area 1?  
 A No, there's not.  
 Q Can you tell us what the area is -- now heading us back to the Oval Office itself, can you tell us -- there's at the very top of the Oval Office a little area that looks -- it's shaped like the fireplace in the dining room Oval Office Complex. Is that a fireplace?  
 A That's a fireplace.  
 Q Okay. And let's just mark that with an "F," too.

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(The witness marked the document.)  
 BY MR. WISENBERG:  
 Q Then there is apparently a doorway leading at 1:00 on the upper right, a doorway to another room out of the Oval Office, is that correct?  
 A Yes. That is normally the entrance that is used when going in and out to see the President.  
 Q Is that typically -- and these questions that I'm asking you about the doors, are they typically closed or open, that's based on your service -- your answer as when you were Chief of Staff?  
 A When I was Chief of Staff. I'm basing it on my experience as Chief of Staff.  
 Q And was that generally kept closed --  
 A Yes.  
 Q -- or open? Closed?  
 A Closed.  
 Q And what is the room or walkway that that goes into, that that doorway goes into?  
 A Okay. If you're looking, again, at the doorway at 1:00 off of the Oval Office, that area there is a reception area as well. Betty Currie's desk would be located -- as you go out that door at 1:00, it would be located to the right of that entrance normally. I'm drawing a desk position here as to where her desk would be located (marking).

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Q Okay. All right. If you'll pardon me, I'm going to hold this up for the grand jurors to look at, and I'll bring it around. Betty Currie's desk, you've just marked -- you've just drawn a little --  
 A A square.  
 Q -- rectangle --  
 A That's correct.  
 Q -- right outside and to the right, and what we're going to call -- I'm going to ask you to call this Reception Area 1. That's Betty Currie's -- this whole area is a reception area (indicating)?  
 A That's correct.  
 Q If you could please mark that for us as Reception Area 1.  
 (The witness marked the document.)  
 MR. WISENBERG: I think what we'll do is take a break. Before you all leave, I need to mention one thing to you, but I'm going to ask, with the permission of the Foreman, may the witness be excused?  
 THE FOREPERSON: Yes.  
 MR. WISENBERG: We'll come get you in about ten minutes.  
 (Witness excused. Witness recalled.)  
 THE FOREPERSON: Mr. Panetta, I'd like to remind you that you're still under oath.

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THE WITNESS: All right.  
 MR. WISENBERG: Let the record reflect that Mr. Panetta has reentered the grand jury room and that we have a quorum.  
 BY MR. WISENBERG:  
 Q You were beginning to talk about the reception area, which is the room -- or the area to the upper right of the Oval Office. Everybody knows where that is on the map. And the door between the Oval Office and that reception area you stated was usually closed; is that correct?  
 A That's correct.  
 Q And then if you walk through that doorway on the map, and you go up and -- it looks like a wall area is being designated there. If you go beyond that wall and take a right, you have drawn a rectangle, which is Betty Currie's desk; is that correct?  
 A That's correct.  
 Q All right. And if you could --  
 A You want me to mark that "BC"?  
 Q "BC."  
 (The witness marked the document.)  
 BY MR. WISENBERG:  
 Q And where we've marked the general area, Reception Area 1.  
 A That's correct.

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Q All right.  
 MR. WISENBERG: You all need to see where that desk is located?  
 A JUROR: We saw it.  
 MR. WISENBERG: You saw that? Okay.  
 BY MR. WISENBERG:  
 Q Now, who else is in that reception area, typically, when you were Chief of Staff besides Ms. Currie?  
 A Normally the only people that are allowed in that area are those that are individuals that are either delivering something, obviously, to Betty Currie or to Nancy Hemreich, who's also located in that area. I assume we'll get to that, but --  
 Q Yes.  
 A And then it would be normally the staff or individuals that are about to meet with the President. It is normally not an area where people are allowed to simply stay or wander. It's an area that is, for a better term, is normally the preliminary step to going in to meet with the President.  
 Q Okay. No loitering.  
 A That's correct.  
 Q Now, who else is regularly stationed there in addition to Betty Currie?  
 A Well, if you -- again, exiting that door at 1:00

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off the Oval Office, if you proceed up, you'll see along the left-hand side a small area that has an access off of Reception Area 1. Located in that area is Nancy Hemreich.  
 Q Okay. You're talking about what looks like a doorway?  
 A That's correct. Again, it's a little V-shaped indentation off of Reception Area No. 1.  
 Q Is it, in fact, a doorway?  
 A That really is a doorway.  
 Q Okay. And is that typically kept open or closed?  
 A Normally it was open, although there were often times when Nancy, in order to do her work, would keep that closed.  
 Q Now, Nancy is exactly where?  
 A Nancy -- the desk for Nancy Hemreich is located approximately in the middle of that area.  
 Q The V-shaped area?  
 A This (indicating).  
 Q Let me look so I can be clear. Oh, okay.  
 A This area here (indicating).  
 Q So it's in the actual -- the room that is on -- basically right on top of the Oval Office.  
 A Yeah. If you look north of the Oval Office, on the other side of the fireplace, there is a little area there.  
 Q That is a very small area, but it does contain a desk for

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(1) Nancy Herrnreich, who is the other aide to the President.  
 (2) (The witness marked the document.)  
 (3) BY MR. WISENBERG:  
 (4) Q And you've drawn a -  
 (5) A A desk.  
 (6) Q A desk for her about in the middle, or the middle  
 (7) and maybe -  
 (8) A Approximately in the middle of that room.  
 (9) Q In the middle of that room would be - and you put  
 (10) an "NH"? Is that how you -  
 (11) A That's correct.  
 (12) Q Herrnreich is how you pronounce it?  
 (13) A That's correct.  
 (14) Q And what is that - is there a name for that room  
 (15) she's in? Is that considered her office?  
 (16) A It was always known as Nancy's office.  
 (17) Q Okay. And that doorway is usually open, but she  
 (18) would close it if she needed to do work.  
 (19) A That's correct.  
 (20) Q All right. And it doesn't look like there's any  
 (21) direct access from that office to the Oval Office, correct?  
 (22) A There is not.  
 (23) Q All right. So, again, in the reception area  
 (24) itself, other than Betty Currie's desk, is there any other  
 (25) manned or unmanned desk?

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(1) A No, there is not.  
 (2) Q All right. And it's typically people making  
 (3) deliveries or staff members about to meet the President; is  
 (4) that correct?  
 (5) A Right, or sometimes visitors who are going in to  
 (6) meet with the President - if they were familiar with the  
 (7) President and knew Betty Currie or Nancy Herrnreich, they  
 (8) might be allowed in that area. Normally visitors would wait  
 (9) in Waiting Area No. 1. But if they were familiar with either  
 (10) Betty Currie or Nancy they might go into that area.  
 (11) Q Okay. So, normally it would be a staffer about to  
 (12) see the President. A visitor who was well known enough -  
 (13) A Right.  
 (14) Q - might be able to wait there. Otherwise that  
 (15) visitor would be in Waiting Area 1.  
 (16) A That's correct.  
 (17) Q All right. What would be an example of a - if you  
 (18) can remember, of a visitor who would have been allowed to  
 (19) wait in Reception Area 1?  
 (20) A Well, for example, if Lloyd Bentsen, who was the  
 (21) former Secretary of the Treasury, was visiting the President,  
 (22) I think he would be comfortable going into that area before  
 (23) seeing the President.  
 (24) Q All right. It would be one where nobody would say  
 (25) you can't go in there.

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(1) A That's right.  
 (2) Q It would be people who were basically had enough  
 (3) stature and knew the White House well enough would feel  
 (4) comfortable going in there.  
 (5) A That's correct.  
 (6) Q All right. Was it one of your accomplishments as  
 (7) Chief of Staff to tighten up that area - let's start with  
 (8) Reception Area 1 - as to who could get into Reception Area  
 (9) 1?  
 (10) A That's correct. Normally - again, for example,  
 (11) for staff going in to brief the President, only those staff  
 (12) who were going to go in to brief the President were normally  
 (13) allowed into Reception Area 1.  
 (14) Q Okay.  
 (15) A I didn't particularly like a lot of staff  
 (16) accumulating in that area because that's very close to where  
 (17) the President's working.  
 (18) Q Okay. How about Waiting Area 1? Was it one of  
 (19) your accomplishments, to also tighten up even people who got  
 (20) into Waiting Area No. 1?  
 (21) A That's right. Normally people were not allowed to  
 (22) just simply wait around in that area. That was either for  
 (23) those who were about to go into a meeting with the President  
 (24) or about to go into a meeting in the cabinet room.  
 (25) Q This is just a - I'm trying to see what walkway

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(1) number we're on. Do we have a walkway here going from -  
 (2) would you call this a walkway or a short walkway that goes  
 (3) from Reception Area 1 to Waiting Area 1?  
 (4) A That's correct. It's a very short walkway.  
 (5) Q All right. No door?  
 (6) A There's no door.  
 (7) Q Until you get to Waiting Area No. 1; is that  
 (8) correct?  
 (9) A That's right. When you get to Waiting Area No. 1,  
 (10) as it shows there, there is a door, a large door, that leads  
 (11) to the cabinet room, and then there is obviously the door  
 (12) that leads to the Oval Office.  
 (13) A There is also a door that leads to the outside  
 (14) walkway that is located - as you go down that small  
 (15) passageway, it is located directly ahead. So if you're  
 (16) looking at Betty Currie's desk, and you go north a little bit  
 (17) to that dark area, to the right of the door to the cabinet  
 (18) room, there is a door to the right of there that leads to the  
 (19) walkway, the colonnade walkway.  
 (20) Q Okay. Would that be right there (indicating)?  
 (21) A That's correct.  
 (22) Q Okay. That would be this little doorway, this  
 (23) little area right here (indicating), right before you get to  
 (24) the cabinet room that juts out to the right of the reception  
 (25) area. That's a doorway to the outside?

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(1) A That's correct.  
 (2) Q Okay. That is typically kept closed?  
 (3) A That's right.  
 (4) Q Do you know if it's kept locked.  
 (5) A I don't know.  
 (6) Q Okay. The door from the reception area to the  
 (7) cabinet room, is that typically closed or open?  
 (8) A To the cabinet room is normally closed.  
 (9) Q The door from Reception Area 1 leading into Waiting  
 (10) Area 1, is that typically closed or open?  
 (11) A That's normally open. There were times on the  
 (12) weekend when that door would be closed, so that the tourists  
 (13) who normally can go through the West Wing would not be able  
 (14) to walk into the reception area.  
 (15) Q Okay. We haven't been doing something, and I'm  
 (16) going to ask you to do it for the record, and that is, we  
 (17) haven't been marking which doors are typically open or  
 (18) closed. If we could do that.  
 (19) I believe you had said that the one leading from  
 (20) the Oval Office to Reception Area 1 is typically closed. I'd  
 (21) ask you put a "C" in that doorway.  
 (22) A This is the doorway at 1:00 off of the Oval Office.  
 (23) Q Going from the Oval Office into Reception Area 1.  
 (24) I'd just ask you to put a "C" for closed.  
 (25) (The witness marked the document.)

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(1) BY MR. WISENBERG:  
 (2) Q And then I think you've testified that the door at  
 (3) 11:00, leading from the Oval Office to Walkway 2 is typically  
 (4) closed; is that correct?  
 (5) A That's correct.  
 (6) Q And if you could put a "C" there.  
 (7) (The witness marked the document.)  
 (8) BY MR. WISENBERG:  
 (9) Q Is that the one you told us is typically locked  
 (10) also?  
 (11) A That's correct.  
 (12) Q You've mentioned that the door that goes to the  
 (13) outside walkway is typically closed, so I'd ask you if you  
 (14) can fit a little tiny "C" into that.  
 (15) (The witness marked the document.)  
 (16) BY MR. WISENBERG:  
 (17) Q And I'm just going to do right now ones that we've  
 (18) talked about. You've mentioned that the door from Reception  
 (19) Area 1 to the cabinet room is typically closed, so I'll ask  
 (20) you to put a "C" there.  
 (21) (The witness marked the document.)  
 (22) BY MR. WISENBERG:  
 (23) Q You've mentioned that the door from the reception  
 (24) area to Waiting Area No. 1 is typically open. I'll ask you  
 (25) to put a zero there. We note your testimony that on the

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[1] weekends it's sometimes closed.  
 [2] (The witness marked the document.)  
 [3] BY MR. WISENBERG:  
 [4] Q You have mentioned that the door leading from  
 [5] Walkway No. 2 to the Roosevelt Room is typically closed.  
 [6] A That's correct.  
 [7] Q I'll ask you to put a "C" there.  
 [8] (The witness marked the document.)  
 [9] BY MR. WISENBERG:  
 [10] Q You've mentioned that the door from the Oval Office  
 [11] Complex, which contains the dining room, that the door from  
 [12] that to Walkway 1 is typically closed.  
 [13] A Yes.  
 [14] Q I'll ask you to put a "C" there. I think that's  
 [15] the one you testified there's a security lock?  
 [16] A That's correct.  
 [17] Q Okay.  
 [18] (The witness marked the document.)  
 [19] BY MR. WISENBERG:  
 [20] Q You've mentioned that the door from Waiting Area  
 [21] No. 1 to Walkway 3 is typically open, Waiting Area 1 to  
 [22] Walkway 3; is that correct?  
 [23] A That's correct.  
 [24] Q I'll ask you to put an "O" there.  
 [25] (The witness marked the document.)

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[1] BY MR. WISENBERG:  
 [2] Q But then on the other side, the door from Walkway  
 [3] No. 3 to the lobby, is typically closed.  
 [4] A That's correct.  
 [5] Q I'll ask you to put a "C."  
 [6] (The witness marked the document.)  
 [7] BY MR. WISENBERG:  
 [8] Q And that the door from Walkway 3 going down into  
 [9] the Roosevelt Room is typically closed.  
 [10] A That's correct.  
 [11] Q I'll ask you to put a "C" there.  
 [12] (The witness marked the document.)  
 [13] BY MR. WISENBERG:  
 [14] Q All right.  
 [15] A I should also put a "C" leading from Walkway No. 1  
 [16] into the Roosevelt Room. That door is normally closed.  
 [17] Q Okay, thank you. We haven't marked that yet.  
 [18] That's Walkway No. 1 up into the Roosevelt Room.  
 [19] (The witness marked the document.)  
 [20] BY MR. WISENBERG:  
 [21] Q And I think you mentioned the door from  
 [22] Walkway No. 4 into the cabinet room, that's the top left of  
 [23] the cabinet room --  
 [24] A Yes.  
 [25] Q -- that door is normally closed.

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[1] A That's correct. The upper door --  
 [2] Q Upper left door.  
 [3] A That's correct. And normally the lower door is  
 [4] closed as well.  
 [5] Q From the waiting area?  
 [6] A That's right.  
 [7] Q From Waiting Area 1 to the cabinet room, we'll put  
 [8] a "C" there, that's normally closed.  
 [9] (The witness marked the document.)  
 [10] BY MR. WISENBERG:  
 [11] Q Okay. Let me ask you about any other doors from  
 [12] the Oval Office. I notice if you look at about 9:00 at the  
 [13] Oval Office --  
 [14] A Yes.  
 [15] Q -- there is a doorway leading into something.  
 [16] A That's correct.  
 [17] Q Let's start with, what is that leading into?  
 [18] A That leads into a very small hallway.  
 [19] Q All right. We'll call that Hall 1.  
 [20] (The witness marked the document.)  
 [21] BY MR. WISENBERG:  
 [22] Q And then -- is that door typically closed or open,  
 [23] the door from the Oval Office to Hall 1, if you know?  
 [24] A That would be normally closed.  
 [25] Q All right. Would you put a "C" there?

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[1] (The witness marked the document.)  
 [2] BY MR. WISENBERG:  
 [3] Q Hall 1, from there there appears to be a door going  
 [4] downward into another room.  
 [5] A Right.  
 [6] Q What is that room?  
 [7] A That room I would, for lack of a better word, call  
 [8] the President's study.  
 [9] A Okay. We'll call that "Study." I'll ask you to  
 [10] mark it "Study."  
 [11] (The witness marked the document.)  
 [12] BY MR. WISENBERG:  
 [13] Q Is the door from Hall 1 to the study typically open  
 [14] or closed?  
 [15] A Actually, that normally is open.  
 [16] Q I'll ask you to put an "O" there.  
 [17] (The witness marked the document.)  
 [18] BY MR. WISENBERG:  
 [19] Q Now, from Hall 1 are there any other -- you appear  
 [20] to have a door from Hall 1 to the Oval Office Complex that  
 [21] includes the dining room.  
 [22] A That's right.  
 [23] Q Is that door typically open or closed?  
 [24] A That's typically open.  
 [25] Q And is there a doorway going up from the hall to

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[1] this -- what's this little area just due north of Hall 1?  
 [2] A The first area -- as you go from the Oval Office  
 [3] into Hall 1, that first area to the right is a bathroom.  
 [4] Q Okay. So that's a doorway to the bathroom,  
 [5] correct?  
 [6] A That's right.  
 [7] Q Is that typically open or closed?  
 [8] A Closed.  
 [9] Q Okay. Do you know if that's a full bath, half-  
 [10] bath?  
 [11] A It's really a half-bath.  
 [12] Q Okay. I'll ask you to put "HB" in there for half-  
 [13] bath.  
 [14] (The witness marked the document.)  
 [15] BY MR. WISENBERG:  
 [16] Q Then is there another room -- the other area -- is  
 [17] there another area that a doorway enters into off of Hall 1?  
 [18] A I --  
 [19] Q There's an area that's marked in white, if you can  
 [20] see here --  
 [21] A Yeah.  
 [22] Q -- due north.  
 [23] A I'm not familiar with that area, unless it's --  
 [24] it's part of the pantry area. But I -- you know, that may be  
 [25] where they've outlined the pantry, but I don't remember a

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[1] door leading into Hallway 4 from that area.  
 [2] Q Okay. You've identified already "PD" --  
 [3] A As the pantry.  
 [4] Q As the pantry door, right?  
 [5] A That's correct.  
 [6] Q Is it conceivable that that leads into --  
 [7] A It could -- there could be --  
 [8] Q Okay.  
 [9] A -- you know, an area where the mess stewards keep  
 [10] food and other articles.  
 [11] Q Okay. But you don't recall that there's actually a  
 [12] door from that to Hallway 1.  
 [13] A No, I don't.  
 [14] Q Well, let's leave that blank for a while then.  
 [15] Is it fair to say you can't exactly place the  
 [16] pantry? You've placed the pantry door, but you can't exactly  
 [17] place the pantry in here?  
 [18] A I think that's fair to say. I never really spent  
 [19] time in the pantry itself, so it's a little hard for me to  
 [20] define its geography.  
 [21] Q But based on your knowledge, is it fair to say that  
 [22] the -- if you know, that there's no door from the pantry into  
 [23] Walkway 1, if you know?  
 [24] A No, no, there is a door that leads from Walkway 1  
 [25] into the pantry.

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(1) Q Okay. And there's also a door from the pantry to  
(2) the Oval Office Complex, including the dining room. That  
(3) would be where you've marked "PD." That appears to go into  
(4) the dining room.  
(5) A That's right.  
(6) Q Okay.  
(7) A That -- the steward has -- there's not only an  
(8) entrance into the pantry from Walkway 1, there is also an  
(9) entrance into the Oval Office -- what's designated now as the  
(10) dining room, there's also an entrance into there.  
(11) Q Oval Office Complex.  
(12) A That's correct.  
(13) Q Right.  
(14) A So you can actually walk through the pantry into  
(15) that dining room.  
(16) Q Okay, from Walkway 1 -- or out into Walkway 1.  
(17) A That's right.  
(18) Q Do I need to repeat that? Or out into Walkway 1,  
(19) okay.  
(20) A All right. Is that door -- have you said whether  
(21) or not that door is typically -- well, so we've got two  
(22) different doors then, the door from the dining room into a  
(23) pantry area and from a pantry area into Walkway 1.  
(24) A That's right.  
(25) Q Do you know, first of all, if the doorway from the

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(1) dining room into the pantry is typically closed?  
(2) A That's normally closed.  
(3) Q All right. Since I don't think -- we've already  
(4) put "PD" there, you might want to put a "C" just right  
(5) underneath the pantry door somewhere, a little "C."  
(6) (The witness marked the document.)  
(7) BY MR. WISENBERG:  
(8) Q And then, I guess, a little "C" somewhere in  
(9) Walkway 1 right on top of where you might exit from the  
(10) pantry.  
(11) A Now, normally, if the stewards are there, that door  
(12) to the pantry will be open, going from Walkway 1 into that  
(13) area.  
(14) Q Okay. It's typically closed unless there's a  
(15) steward.  
(16) A That's right.  
(17) Q Okay. Now, is it possible -- and we won't  
(18) speculate on this much more -- but since you're not sure what  
(19) the blank area is to the north of Walkway 1, are you fairly  
(20) confident that there's a pantry door that goes into Walkway 1  
(21) as opposed to Walkway 2? Because it looks like --  
(22) A Yes.  
(23) Q You are.  
(24) A Yes.  
(25) Q Okay, all right. If you look at our map here, it

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(1) looks as if Walkway 2 goes into this odd-shaped -- has a door  
(2) into this odd-shaped white area that we can't identify that  
(3) you think might be another pantry area.  
(4) A Are you aware of a door from Walkway 2 into this  
(5) unidentified area?  
(6) A I'm aware of one door into the pantry area, and no  
(7) other, so --  
(8) Q Okay, so --  
(9) A Wherever that's located. I mean, I think --  
(10) Q All right.  
(11) A My recollection was that that door was located just  
(12) prior to going into Walkway No. 2.  
(13) Q Okay. Then assuming that that's right, that your  
(14) memory is right that it goes into Walkway 1, the door out of  
(15) the pantry, as opposed to Walkway 2, do you recall any other  
(16) door -- you've identified already one, two, three, four doors  
(17) going out of Walkway Area 2.  
(18) A Do you recall what would be a fifth one, if it is  
(19) indeed a door, over on the left -- kind of the left arm pit of  
(20) the eagle, for want of a better word, the left arm pit of the  
(21) Walkway 2?  
(22) A I guess I'd have to say that if that's where  
(23) they've located the pantry door, then that would be the only  
(24) door that I would recall that would lead off of Walkway 1.  
(25) There is no other door that I can remember.

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(1) Q Okay. I was asking about Walkway 2, though.  
(2) A Oh, I'm sorry.  
(3) Q You identified four doors leading out of Walkway 2,  
(4) the eagle.  
(5) A Right.  
(6) Q But then you've got what could be a little -- it  
(7) might not be a door, but you've got this odd-shaped area --  
(8) A Right here (indicating). Is that right?  
(9) Q Yes. Do you recall such a door?  
(10) A As I stated, it may be that they're identifying  
(11) what is the entrance to the pantry as being --  
(12) Q In Walkway 2.  
(13) A That's right.  
(14) Q But unless it is, you don't remember.  
(15) A That's right.  
(16) Q Okay. You don't remember that door there on our  
(17) map.  
(18) A There's only one door there, and it's a door that  
(19) leads to the pantry, and it -- at least according to this  
(20) map, they may be locating it right at that point.  
(21) Q Okay. Now, the door from Walkway 2 to Waiting Area  
(22) 1, is that typically closed or open? I don't know if I've  
(23) asked you that or not, but --  
(24) A That is typically open.  
(25) Q I'll ask you to put an "O" there.

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(1) (The witness marked the document.)  
(2) BY MR. WISENBERG:  
(3) Q And Walkway 2 to Walkway 1, is that typically open  
(4) or closed?  
(5) A Open.  
(6) Q Okay. I think you answered that before we were  
(7) writing it down.  
(8) (The witness marked the document.)  
(9) BY MR. WISENBERG:  
(10) Q Now, let's take a look at 3:00 in the Oval Office,  
(11) the middle right-hand portion of the Oval Office. Is that a  
(12) doorway leading out into the walkway?  
(13) A That's correct.  
(14) Q Is that typically kept closed or open?  
(15) A That's typically closed.  
(16) Q Is that typically locked, if you know?  
(17) A Yes, I believe so.  
(18) (The witness marked the document.)  
(19) BY MR. WISENBERG:  
(20) Q All right. Can you start with the rooms to the  
(21) right of your room, 111, and tell us what -- well, let me  
(22) stop before you do that.  
(23) The President, as a typical or usual matter, not  
(24) exclusively, will do his work in the Oval Office; is that  
(25) correct?

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(1) A That's correct.  
(2) Q And I believe you said that you thought President  
(3) Clinton used it a little more than other presidents; is that  
(4) correct?  
(5) A That was -- that was my -- at least my  
(6) understanding of history, although, for example, President  
(7) Nixon rarely used it and had his main office located in the  
(8) Old Executive Office Building. So there were other  
(9) presidents that kind of varied as to their use of it. But he  
(10) largely used the desk in the Oval Office for his work.  
(11) Q You said he also sometimes would do work in the  
(12) dining room on that dining room table.  
(13) A Yes. For example, if there was an event scheduled  
(14) for the Oval Office, where he would make an announcement in  
(15) the Oval Office or greet a visiting dignitary or a visiting  
(16) head of state in the Oval Office, then the Oval Office would  
(17) be set up for the press for that event. And so, therefore,  
(18) there were a lot of cameras and wires that had to go through  
(19) the Oval Office.  
(20) And so what we would then do is adjourn to what is  
(21) designated on this map as the Oval Office Complex to brief  
(22) the President for any particular event he might have to do in  
(23) the Oval Office.  
(24) Q Okay. Would the President ever do work in what  
(25) you've designed as his study?

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[1] A I never saw him use the study for that purpose.  
 [2] It's not to say that he doesn't, but I never saw him use the  
 [3] study for that purpose.  
 [4] Q All right. What, to your knowledge, did he use the  
 [5] study for?  
 [6] A The study really has a lot of mementoes from --  
 [7] that are very close to the President, both from his time as  
 [8] governor in Arkansas as well as president, and there are  
 [9] photographs on the walls, and there are books there that I  
 [10] think, you know, he feels very close to. So that he  
 [11] generally, I think, would use the study for resting and for  
 [12] kind of gathering his thoughts.  
 [13] And then -- for example, if he had to change -- if  
 [14] he had to change his shirt or his suit because he was going  
 [15] to an event or -- for example, when he gave addresses from  
 [16] the Oval Office and he would have to change for that address,  
 [17] he would change in that study.  
 [18] Q You mentioned resting, regathering, changing.  
 [19] Relaxation?  
 [20] A Yes.  
 [21] Q Anything else?  
 [22] A If he was speaking to someone and wanted privacy  
 [23] from staff, he would go into the study and use the phone in  
 [24] that area.  
 [25] Q What else?

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[1] A That's about all I can recall.  
 [2] Q So speaking on the phone and wanting privacy from  
 [3] the staff, okay.  
 [4] So that's all you can remember to your personal  
 [5] knowledge?  
 [6] A That's correct.  
 [7] Q What about from anything you might have heard from  
 [8] others that the study was used for?  
 [9] A I think if the President was taking a nap, he would  
 [10] use the study for that purpose.  
 [11] Q But you never saw him napping in there?  
 [12] A No, I really didn't.  
 [13] Q Well, what else? Again, based on -- we're now into  
 [14] the area of not what you saw, but what you heard while you  
 [15] were Chief of Staff.  
 [16] A It was -- as I said, it was, I think, all of the  
 [17] things that I mentioned. It was really -- it was really the  
 [18] area that was kind of his getaway from the -- I think the  
 [19] pressures of the office, if you wanted to find some peace.  
 [20] That was generally what I understood.  
 [21] Q This area, general area we've been talking about in  
 [22] here (indicating), what would you consider if you had to take  
 [23] -- first of all, let's just take a group of rooms and  
 [24] hallways. What would you consider the most private -- and  
 [25] I'm not talking about one room here, I'm talking about a

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[1] general area that you, as Chief of Staff, made sure -- you  
 [2] considered the most kind of area you wanted to maintain the  
 [3] least access and you wanted the most privacy in terms of a  
 [4] grouping here in the Oval Office area, what would you  
 [5] include?  
 [6] A I think the most important areas to protect the  
 [7] President in terms of his privacy would be following:  
 [8] Clearly, the dining room and Oval Office Complex, the study,  
 [9] that general area located to the left of the Oval Office, was  
 [10] really his private quarters, the Oval Office and the  
 [11] reception area. The reception area to a less extent because,  
 [12] I mean, obviously, that was an area in which there was  
 [13] access.  
 [14] But in terms of protecting the President's privacy,  
 [15] it was largely the Oval Office, the study, and the dining  
 [16] room area.  
 [17] Q And you feel that one of your accomplishments as  
 [18] Chief of Staff was that you made those areas more private and  
 [19] arranged for less access; is that correct?  
 [20] A That's correct.  
 [21] Q Now, within that area, what would you consider --  
 [22] based on your knowledge as Chief of Staff, what would you  
 [23] consider the most private area of the President, excluding --  
 [24] let me exclude bathrooms.  
 [25] A I think the study.

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[1] Q Now, let's take a look at 111. Who or what is to  
 [2] the right of 111, 111 being your office, the Chief of Staff's  
 [3] Office.  
 [4] A Yes. If you can look at Room 111, there is a door  
 [5] located at approximately 3:00, a little higher. That door  
 [6] went into what I would call a reception area for myself, as  
 [7] Chief of Staff, and the Deputy Chief of Staff, Mr. Ickes, who  
 [8] had Room 108. So there were several secretarial desks  
 [9] located in that open space there that is located between Room  
 [10] 111 and Room 108.  
 [11] A I don't believe we have a Reception Area 2 yet, so  
 [12] let's call this Reception Area 2.  
 [13] (The witness marked the document.)  
 [14] MR. WISENBERG: Everybody know where we are?  
 [15] JURORS: Yes.  
 [16] BY MR. WISENBERG:  
 [17] Q Is the door between Room 111 and Reception Area 2  
 [18] normally closed or open?  
 [19] A I'm sorry, could you repeat that?  
 [20] Q Sure. Was the door between 111, your office, and  
 [21] Reception Area 2 normally closed or --  
 [22] A Closed.  
 [23] Q Thank you. Then you said 108 is Harold Ickes'  
 [24] room?  
 [25] A That's right.

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[1] Q All right. If you could just put under 108 "HI."  
 [2] (The witness marked the document.)  
 [3] BY MR. WISENBERG:  
 [4] Q And if you could put under 111, your office, "COS"  
 [5] for Chief of Staff.  
 [6] (The witness marked the document.)  
 [7] BY MR. WISENBERG:  
 [8] Q Is there even a doorway from Reception Area 2 to  
 [9] 108, or is that just simply an open area?  
 [10] A No, that is a door. There's a door there.  
 [11] Q Okay.  
 [12] A It doesn't show it here, but there is a door there,  
 [13] and that door is normally closed.  
 [14] Q All right. Now, the door -- that's closed.  
 [15] Now, the door leading from Reception Area 2 --  
 [16] first of all, would you still call the area to the immediate  
 [17] north of Reception Area 2 Walkway 1?  
 [18] A That's correct.  
 [19] Q All right. I mean, I notice, for instance, that  
 [20] there's a little opening between the area due north of  
 [21] Reception Area 2 and kind of what we've designed as Walkway  
 [22] 1. But you'd still consider it all part of the same walkway?  
 [23] A Yes. That walkway kind of walks through there and  
 [24] then takes a right turn down to Room 115.  
 [25] Q Okay. There's no door in the area I'm talking

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[1] about, that little --  
 [2] A I don't remember any door there, no.  
 [3] Q Okay. So we're still talking about the area due  
 [4] north of Reception Area 2 as Walkway 1, correct?  
 [5] A That's correct.  
 [6] Q And the door from Walkway 1 to Reception Area 2 is  
 [7] typically kept open or closed?  
 [8] A That would normally be open during the business  
 [9] day.  
 [10] Q Okay. And I'll ask you whenever you designate  
 [11] these to put a "O" or a "C."  
 [12] A Okay.  
 [13] (The witness marked the document.)  
 [14] BY MR. WISENBERG:  
 [15] Q And the door from Mr. Ickes' room to Walkway 1,  
 [16] would that typically be open or closed?  
 [17] A I have to tell you that -- I mean, this map shows  
 [18] an opening into Room 108, which looks like a door leading to  
 [19] Walkway 1. I do not remember a door in that area.  
 [20] Q Okay. Well, then let's leave it blank for the time  
 [21] being.  
 [22] What is the room next to -- it looks like a room to  
 [23] the right of 108 with a partial room, or partial area within  
 [24] it.  
 [25] A Yes.

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[1] Q Can you educate us as to what's in there?  
 [2] A Yes. This was the time that I was there George  
 [3] Stephanopoulos's office.  
 [4] Q Okay. And was he called Communications Director?  
 [5] A No, he wasn't. He was really an assistant. What I  
 [6] did was -- he had been one of those that I had termed a  
 [7] generalist and I made him an assistant to the Chief of Staff.  
 [8] Q Okay. So the bigger area, the whole area is George  
 [9] Stephanopoulos's office when you were there.  
 [10] A Yes. There is a -- if you look at that block next  
 [11] to -- to the right of Room 108, there is a very small  
 [12] reception area in which there was a secretary located in that  
 [13] area, and then his desk was located in the larger kind of L-  
 [14] shaped area.  
 [15] Q Okay. Then in the larger, L-shaped area I'll ask  
 [16] you to put "GS" for George Stephanopoulos.  
 [17] (The witness marked the document.)  
 [18] BY MR. WISENBERG:  
 [19] Q And then this would be his reception area, the  
 [20] little area you talked about where his secretary was?  
 [21] A That's correct. Off of Walkway 1 --  
 [22] Q Okay.  
 [23] A -- there was a desk there and a secretary.  
 [24] Q Why don't we call that Reception Area 3, and if you  
 [25] just want to put "Rec.," or however you want to do it. It's

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[1] Reception Area 3.  
 [2] A Right.  
 [3] (The witness marked the document.)  
 [4] BY MR. WISENBERG:  
 [5] Q Okay. Is there a door between 108 and Reception  
 [6] Area 3, or is that just a --  
 [7] A No, there is no door that accesses that area.  
 [8] Q So the blank ink just didn't go all the way through  
 [9] on this -- whoever did this.  
 [10] A Well, yeah, I guess I -- I don't know the date of  
 [11] this map. I mean, there are obviously changes that have  
 [12] probably been made.  
 [13] Q Right. Well, when you were there there was no  
 [14] door, correct?  
 [15] A There was no door.  
 [16] Q Then I'll ask you to kind of connect the two lines.  
 [17] (The witness marked the document.)  
 [18] BY MR. WISENBERG:  
 [19] Q Was the doorway from Reception Area 3 to Walkway 1  
 [20] typically open or closed?  
 [21] A That was typically open.  
 [22] Q Okay. Was there a doorway between Reception Area 3  
 [23] and Mr. Stephanopoulos's office?  
 [24] A Yes, that was -- I think they were shuttered doors.  
 [25] It wasn't a hard door, but someone in that office could get

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[1] privacy by closing those doors.  
 [2] Q Okay. A shuttered door?  
 [3] A I believe it was a shuttered door.  
 [4] Q Were they typically left open or closed?  
 [5] A Normally they were open.  
 [6] Q Right. If he wanted privacy, he could close them.  
 [7] A That's right.  
 [8] Q And then the area between Mr. Stephanopoulos's  
 [9] office and the Oval Office Complex, including the dining  
 [10] room, I take it there's a doorway between those two?  
 [11] A Yes, there is. There is a very small -- there's a  
 [12] small door that leads from the office that we designed George  
 [13] Stephanopoulos, "GS," leading into the dining room.  
 [14] Q Was that typically open or closed?  
 [15] A That was closed.  
 [16] Q All right. Do you know if it was locked or not?  
 [17] A I do not know.  
 [18] Q Okay. All right. Are we all fairly on the --  
 [19] A I should state for the record, though, that I had  
 [20] made clear to George Stephanopoulos that he was not to use  
 [21] that door for access into the President's office --  
 [22] Q Okay.  
 [23] A -- and that his access would be through the normal  
 [24] entrance.  
 [25] Q Had it been your information or your personal

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[1] knowledge prior to you coming on and tightening ship, that he  
 [2] did feel free to walk through there?  
 [3] A That was my understanding.  
 [4] Q It had been his office before when he was a  
 [5] generalist?  
 [6] A That's correct.  
 [7] Q Okay. You made him into a specialist.  
 [8] A Yes, of sorts.  
 [9] Q All right. Is the area at 3:00 leading from the  
 [10] Oval Office to the outer area, is that an outer area -- you  
 [11] said the door is usually kept closed. You've referred  
 [12] generally to the outer walkway as the colonnade?  
 [13] A That's right. Those series of dots that you see  
 [14] there are the colonnades that adjoin the Oval Office. So  
 [15] that's normally called, you know, the colonnade walkway.  
 [16] Q And would that include this area that seems to be  
 [17] more enclosed just to the right of the Oval Office?  
 [18] A That's right.  
 [19] Q All right. It's all still considered part of the  
 [20] colonnade.  
 [21] A It is. There are some chairs out there that I  
 [22] guess some presidents have used. I've never seen President  
 [23] Clinton use those chairs. But it's really intended as kind  
 [24] of -- almost a porch at that point. But it really was never  
 [25] used for that purpose.

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[1] Q Okay. Can you just mark that area that you call  
 [2] the colonnade -- if you could just write "Colonnade."  
 [3] (The witness marked the document.)  
 [4] BY MR. WISENBERG:  
 [5] Q Can you tell us what the areas in the lobby -- if  
 [6] you all can see "Lobby," kind of center left in our map of  
 [7] the first floor -- what would be the two area underneath the  
 [8] lobby?  
 [9] A The area to the -- the first block to the left  
 [10] below Lobby would have been a secretarial area. The area to  
 [11] the right would have been my other Deputy Chief of Staff's  
 [12] office.  
 [13] Q Okay. Would it be fair to call that a -- also to  
 [14] call the room to the left a reception area?  
 [15] A That's correct.  
 [16] Q All right. Why don't we call that Reception  
 [17] Area 4? And I'll ask you to mark it.  
 [18] (The witness marked the document.)  
 [19] BY MR. WISENBERG:  
 [20] Q And then there's a doorway from there leading to  
 [21] the office of your Deputy Chief of Staff?  
 [22] A That's right.  
 [23] Q Harold Ickes is one of your deputies, correct?  
 [24] A That was -- he's in Room 108.  
 [25] Q Right.

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[1] A That would have been either Erskine Bowles,  
 [2] initially, and then Evelyn Lieberman would have worked in  
 [3] that office.  
 [4] Q Okay. I'll ask you to put "EB," and then under  
 [5] it -- who was the other person?  
 [6] A "EL."  
 [7] Q "EL," Evelyn Lieberman.  
 [8] (The witness marked the document.)  
 [9] BY MR. WISENBERG:  
 [10] Q She succeeded Mr. Bowles; is that correct?  
 [11] A That's correct.  
 [12] Q All right. And maybe if we could put somewhere  
 [13] above the doorway "DCOS," for Deputy Chief of Staff, just  
 [14] "DCOS."  
 [15] (The witness marked the document.)  
 [16] BY MR. WISENBERG:  
 [17] Q And if we could also put that on top of the word  
 [18] "Room" in Room 108, where you've said Mr. Ickes was.  
 [19] A Right.  
 [20] (The witness marked the document.)  
 [21] BY MR. WISENBERG:  
 [22] Q If you know, was the doorway between Reception Ar  
 [23] 4 and Mr. Bowles's office open or closed, typically?  
 [24] A Closed.  
 [25] Q And was the doorway, if there is one, between

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[1] Walkway 1 -- I guess there would have to be -- between  
 [2] Walkway 1 and Reception Area 4 typically open or closed?  
 [3] A Open.  
 [4] Q Okay. This area we haven't been able to identify  
 [5] to the north of Hall 1, getting back to the area of the study  
 [6] off of the Oval Office, is it possible that that's a closet,  
 [7] or does that job your memory that that could be a closet?  
 [8] I don't want you guessing, but just --  
 [9] A It could be a closet, but I --  
 [10] Q Okay.  
 [11] A -- I just honestly don't remember having used that  
 [12] door -- if there is a door there, having used it.  
 [13] Q Okay. All right, we'll leave it blank.  
 [14] From the Oval Office Complex, which includes the  
 [15] dining room, there appears to be a doorway going south, and  
 [16] it's marked on the map "Room 110." Tell us what that is, if  
 [17] you know. And I can't tell whether that's inside or outside,  
 [18] though it has a room number.  
 [19] A I think this is referring to perhaps a room located  
 [20] below.  
 [21] Q Okay.  
 [22] A Because to that area off of my office, which was  
 [23] Room 111, where those areas -- it opened up into the grounds.  
 [24] There is no room that's located there.  
 [25] Q Okay, all right. Do you remember a door leading

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[1] from the Oval Office Complex room out into the grounds?  
 [2] There appears to be one on the map.  
 [3] A There is a door that leads out from the Oval Office  
 [4] Complex/dining room area into a kind of a patio area that is  
 [5] sometimes used by the President for luncheons outside.  
 [6] Q Okay. Is that typically an open or closed doorway  
 [7] there?  
 [8] A That's closed.  
 [9] A All right. Why don't you put somewhere down below  
 [10] that door "Patio"?  
 [11] (The witness marked the document.)  
 [12] BY MR. WISENBERG:  
 [13] Q All right. Did your door -- did you actually have  
 [14] a door that opened onto the -- did the people in these  
 [15] offices, 111, Reception Area 2, 108, George Stephanopoulos --  
 [16] did you all have access to the grounds?  
 [17] A I do not recall any access to the grounds from  
 [18] George Stephanopoulos's room or Harold Ickes' room or  
 [19] Reception Area 2. I did have a door that led off of my room,  
 [20] Room 111, that had -- there was access to kind of a similar  
 [21] patio area.  
 [22] Q Okay. And is that door kind of marked by a line  
 [23] over to the left of 111? Or can you tell me where on 111,  
 [24] left, right, center?  
 [25] A Actually, that's a window. I think the door is

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[1] located more in the middle of that wall to the south of Room  
 [2] 111.  
 [3] Q Okay, so right in the middle.  
 [4] A Right.  
 [5] Q It doesn't look like it's noted on the map.  
 [6] A That's right.  
 [7] Q But there's kind of a white -- right in the middle,  
 [8] a white area with a line through the middle of it.  
 [9] A That's correct.  
 [10] Q That would be it?  
 [11] A That's correct.  
 [12] Q Would that typically be open or closed?  
 [13] A Closed.  
 [14] Q If you could put a "C" either on that or right  
 [15] above it or right under it.  
 [16] (The witness marked the document.)  
 [17] BY MR. WISENBERG:  
 [18] Q And then put "Patio" -- I guess we'll put "Patio  
 [19] 2."  
 [20] (The witness marked the document.)  
 [21] BY MR. WISENBERG:  
 [22] Q And I'll ask you to put number 1 under the patio --  
 [23] you've previously mentioned the one south of the Oval Office  
 [24] Complex.  
 [25] (The witness marked the document.)

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[1] BY MR. WISENBERG:  
 [2] Q You mentioned that the study had a lot of mementoes  
 [3] in it, the President's study: is that correct?  
 [4] A That's correct.  
 [5] Q How was it furnished, if you recall, other than the  
 [6] mementoes?  
 [7] A I believe it had a small desk area with a telephone  
 [8] on it to the right, and then a couch located to the left as  
 [9] you entered the study.  
 [10] Q And when you say "the right," that's as we're  
 [11] looking at it on the map here. There's a desk in the right;  
 [12] is that correct?  
 [13] A I'm sorry, as --  
 [14] Q As we're looking at the map, as you're looking at  
 [15] it.  
 [16] A I'm using my best recollection --  
 [17] Q Sure.  
 [18] A -- because we really didn't spend a lot of time in  
 [19] there, but as you go in through the door from what we've  
 [20] designated as Hallway No. 1 into the study, there was a desk  
 [21] directly -- straight ahead of that door --  
 [22] Q Okay.  
 [23] A -- as I recall. And then to the -- as you went in  
 [24] that door, to the immediate left, there would have been a  
 [25] couch.

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[1] Q Okay. I'll ask you to mark -- to draw a rectangle  
 [2] for the desk and put a "D" on it, where you remember it  
 [3] being, and then another rectangle for the couch and put "S"  
 [4] for sofa, so we won't confuse it with open and closed.  
 [5] (The witness marked the document.)  
 [6] BY MR. WISENBERG:  
 [7] Q There's a question from one of the grand jurors.  
 [8] A JUROR: Which wall is the sofa on?  
 [9] BY MR. WISENBERG:  
 [10] Q Which wall would the sofa be on?  
 [11] A The sofa would have been as you -- the wall between  
 [12] Hallway 1 and the study.  
 [13] Q Okay. And the desk is against the wall between the  
 [14] study and the Oval Office Complex?  
 [15] A That's right.  
 [16] Q Okay. Is it facing that or facing out towards the  
 [17] study?  
 [18] A It's facing the wall.  
 [19] Q Okay. All right. So if you were sitting at the  
 [20] desk, you'd be facing the wall --  
 [21] A The wall.  
 [22] Q -- to the Oval Office Complex.  
 [23] Is there an individual named Steve Goodnin who was  
 [24] there?  
 [25] A Steve Goodin.

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[1] Q Okay. And what was his position?  
 [2] A Steve Goodin was the principal person assigned to  
 [3] travel with the President as his traveling aide. I don't  
 [4] recall his specific title, but he was the principal traveling  
 [5] aide with the President.  
 [6] Q Aide. Now, is that different than -- that's not  
 [7] like a valet. That's --  
 [8] A No.  
 [9] Q Okay. There's a separate person who's a valet.  
 [10] A That's right.  
 [11] Q Okay. This is just an aide, like an aide-de-camp?  
 [12] A This was an aide-de-camp, exactly, in short, that,  
 [13] you know, would provide -- would carry the notes for the  
 [14] President, if he was traveling, would ensure that -- in  
 [15] dealing with the Secret Service, that all of the proper steps  
 [16] had been taken, would travel with the President going to  
 [17] events, although he didn't travel in the car with the  
 [18] President, he would travel in usually the accompanying cars  
 [19] with the President.  
 [20] And so that he was someone who had a great deal of,  
 [21] as you say -- I think the best way to say it is, he served as  
 [22] an aide-de-camp.  
 [23] Q And what would your definition of aide-de-camp be?  
 [24] What you've just given us as to what he does? Strike the  
 [25] question.

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[1] How do you spell that, as you recall, Goodin?  
 [2] A Goodin, G-o-o-d-i-n.  
 [3] Q d-i-n, okay, all right. Did he -- I know you said  
 [4] that you had ultimate line authority over everybody in the  
 [5] White House, but was he considered to be out of your office  
 [6] in even a more intimate sense, the Chief of Staff's Office,  
 [7] or --  
 [8] Q Well, I would work very closely with Steve. But  
 [9] Steve was responding directly to the President because, you  
 [10] know, he would have to do certain things, and so, obviously,  
 [11] he had a very close relationship to the President.  
 [12] But Steve would also communicate with me, bring to  
 [13] my attention certain things, clear things with me. So we had  
 [14] developed that kind of relationship as well.  
 [15] Q All right. He was listening to you, he was  
 [16] listening to the President; is that correct?  
 [17] A That's correct.  
 [18] Q You've mentioned the desk and the sofa in the  
 [19] study. What else do you recall being in there, other than  
 [20] the mementoes you have mentioned?  
 [21] A My recollection is that there are bookshelves that  
 [22] are located in that study that would be on the wall located  
 [23] between the study and the Oval Office, and that the rest was  
 [24] just -- there was nothing particularly distinctive that I can  
 [25] remember other than, you know, small tables and, you know,

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[1] usually trophies or awards that the President had received.  
 [2] Q So there were some small tables?  
 [3] A I believe there were some small tables in there.  
 [4] Q On which one could place these mementoes.  
 [5] A That's correct.  
 [6] Q There's a bookshelf against the wall leading to the  
 [7] Oval Office, correct?  
 [8] A That's right.  
 [9] Q Do you recall a rocking chair being in there?  
 [10] A I think there is a rocking chair in there,  
 [11] approximately in that corner located across from what we've  
 [12] designated as the sofa.  
 [13] Q A corner across, like catty-corner or --  
 [14] A I believe it was in the area that is, as I said,  
 [15] located to the south of where we designated a sofa.  
 [16] A Bottom right of the study?  
 [17] A Correct.  
 [18] Q Okay.  
 [19] A I believe.  
 [20] Q All right. Can you put "RC" for rocking chair?  
 [21] (The witness marked the document.)  
 [22] BY MR. WISENBERG:  
 [23] Q And I won't ask you to put "BS" for bookshelf, but  
 [24] if you could just put "Books," if you could kind of write  
 [25] that in where you think the books are.

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[1] (The witness marked the document.)  
 [2] BY MR. WISENBERG:  
 [3] Q All right. Thank you very much, and we'll have  
 [4] some more questions now that we've got this portion of the  
 [5] map marked out.  
 [6] Let me ask you, when you were Chief of Staff, how  
 [7] often would you estimate on a daily basis -- and I know  
 [8] you've said sometimes it's hard to come up with what a  
 [9] typical day is because you've got crises and whatnot. But,  
 [10] typically, how often on a daily basis would you interact with  
 [11] the President?  
 [12] A Again, as I said, if there is such a thing as a  
 [13] typical day. Normally, the interaction with the President  
 [14] would begin after my staff meetings. And, again, I had a  
 [15] 7:30 kind of senior staff meeting and then an 8:15 with the  
 [16] broader White House staff meeting. And that was, again,  
 [17] informational, to go over the schedules, to, you know, try to  
 [18] pick up any information from any of the staff.  
 [19] I would then go -- greet the President when he was  
 [20] coming from the residence and would then brief him, usually  
 [21] in the Oval Office, sometime between 9:00 and 9:30, and would  
 [22] spend approximately 15 minutes, perhaps longer, briefing him  
 [23] on what was the schedule for the day, different issues that I  
 [24] thought he should be aware of, and then he would present to  
 [25] me any issues or questions or concerns that he had.

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[1] Then we normally would have a briefing on foreign  
 [2] policy issues, and I would attend that briefing, and it would  
 [3] generally constitute either an intelligence briefing from the  
 [4] CIA, initially, going over CIA reports, and then the National  
 [5] Security Adviser would normally brief the President on any  
 [6] foreign policy issues that were pertinent at that time.  
 [7] Q Would you sit in for that?  
 [8] A Yes, I would. Then usually after that briefing,  
 [9] there was either an event or additional meetings for the  
 [10] President. Normally there was an event that he would have  
 [11] either in the Oval Office or the Rose Garden, or it could be,  
 [12] of course, outside of the White House.  
 [13] But if the event was in the White House, then would  
 [14] proceed from the foreign policy briefing to a briefing for  
 [15] the President on the event, in which we would go over his  
 [16] remarks, indicate how the event is supposed to take place,  
 [17] and then normally at the end of that, brief him on possible  
 [18] questions that he might get if it was a press event.  
 [19] Then if there was an event, I would normally attend  
 [20] the event in the Oval Office.  
 [21] So I would on most days be with the President  
 [22] throughout the morning through, you know, the noon period.  
 [23] Q It sounds like it was almost on a continuing basis.  
 [24] A Yes, that's correct, usually. I mean, there may  
 [25] have been times when I had to go back to my office, but

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[1] normally it was trying to make sure that the President was  
 [2] properly briefed and that the events went according to our  
 [3] strategy and our plan.  
 [4] Then, normally, at noontime, or around noontime,  
 [5] sometimes it was 12:00, sometimes it was 1:00, the  
 [6] President -- we would try to, as I said, allow him time to  
 [7] work in his office, and he would normally get a lunch at that  
 [8] point, or he might have a lunch with the Vice President.  
 [9] And, normally, during that period, I would go back  
 [10] to my office and do the work that I had to do. I would be,  
 [11] you know, working on issues, working on briefings, listening  
 [12] to staff on issues that would have to be presented to the  
 [13] President.  
 [14] Or if -- as, for example, during the budget battle,  
 [15] I would have to go up to Capitol Hill and meet with the  
 [16] leadership on Capitol Hill and meet with other members of the  
 [17] Congress, developing strategy or discussing other issues that  
 [18] they had.  
 [19] So there was usually a period in the early  
 [20] afternoon where we did not have that much access -- personal  
 [21] relationship. Now, during that time, he might call me, he  
 [22] might want to -- you know, might want to know about something  
 [23] he had run across on his desk.  
 [24] Then, usually, in the latter part of the day, from,  
 [25] as I said, maybe 3:00 to about 6:00, there would be briefings

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[1] for the President. We would either do a scheduling briefing  
 [2] for him, or if there was a budget that he had to be briefed  
 [3] on or economic issue or any of a myriad of issues, obviously,  
 [4] that the President has to deal with, we would brief him on  
 [5] foreign policy issues, and I would attend those briefings.  
 [6] And so we would have access at that point.  
 [7] Then, if he was to -- after those meetings, he was  
 [8] to go to a reception or a fundraiser or a dinner, then I  
 [9] normally would not accompany him and would go back to my  
 [10] office to again continue to work on issues.  
 [11] And then, particularly during the campaign year, as  
 [12] I said, if there were political meetings, then when he  
 [13] returned from the event, we might -- there was a group that  
 [14] met with him on political issues, and that would be over in  
 [15] the private residence, and that might run late into the  
 [16] evening. And then, obviously, I had access to the President.  
 [17] So that gives you at least a typical day.  
 [18] Now, on a travel day, if I went with the President  
 [19] on a travel day, then there were times when, frankly, I would  
 [20] have access with him from the time he got up to the time he  
 [21] went to bed.  
 [22] Q And if you didn't, you would not have access at all  
 [23] while he was gone, obviously.  
 [24] A That's right.  
 [25] Q But either you or one of your --

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[1] A Deputies.  
 [2] Q -- deputies. So you even tried to staff it at that  
 [3] level, that either Ickes or Bowles could go with him when you  
 [4] didn't.  
 [5] A Yes. On every trip that the President took it was  
 [6] either myself or Harold Ickes or Erskine Bowles, and then,  
 [7] obviously, later, Evelyn Lieberman.  
 [8] Q And that's partially to prevent the return of the  
 [9] generalist.  
 [10] A It was to ensure that at all times there was  
 [11] somebody there with authority to make the decisions that had  
 [12] to be made and to maintain discipline.  
 [13] Q Okay. What is your -- I take it you are free to  
 [14] continue this afternoon?  
 [15] A I don't have a choice, do I? Yes.  
 [16] Q Okay, thank you. I needed to ask you that for  
 [17] scheduling purposes.  
 [18] I'm going to keep questioning until the Foreman  
 [19] tells me that --  
 [20] THE FOREPERSON: You have ten minutes.  
 [21] MR. WISENBERG: Thank you.  
 [22] BY MR. WISENBERG:  
 [23] Q Okay. So it's almost fair to say that you couldn't  
 [24] even quantify, "I was with him 'x' amount of times, on a  
 [25] typical day." You were with him almost continuously in the

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[1] morning, and not as often in the afternoon, but --  
 [2] A That's correct.  
 [3] Q -- frequent interaction.  
 [4] A That's correct. And then, normally, if there was a  
 [5] political meeting, then I would be with him in the evening.  
 [6] If there wasn't, then I would not see him from, you know,  
 [7] perhaps 6:00 or 7:00 on.  
 [8] Q If you wanted to meet with him, what did you need  
 [9] to do, typically?  
 [10] A If I wanted to meet with him, I would go to the  
 [11] reception area, and then I would normally ask Betty Currie or  
 [12] Nancy if the President was occupied, and if they indicated  
 [13] that he wasn't, then I would knock and go into the Oval  
 [14] Office.  
 [15] Q Would there ever be a time when there wasn't  
 [16] somebody, such as a Nancy or a Betty, there as a buffer in  
 [17] the reception area or Nancy's office?  
 [18] A No, I --  
 [19] Q Well, let me rephrase it to say while the President  
 [20] was in the Oval Office area.  
 [21] A During the week -- and you have to kind of  
 [22] distinguish the two. During the week, Betty Currie and Nancy  
 [23] Hemreich were always there when the President was located  
 [24] there, one or the other.  
 [25] Q "There," being the Oval Office, the study, or the

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[1] Oval Office Complex.  
 [2] A Yeah, they would be -- they'd be located at their  
 [3] desks.  
 [4] Q Right.  
 [5] A So that one or the other would be there, and  
 [6] normally both.  
 [7] On weekends -- on Saturday, normally, Betty Currie  
 [8] and sometimes Nancy were there on Saturdays as well, but  
 [9] there were times when they might not be there because it  
 [10] was -- you know, like a Saturday afternoon, they would be  
 [11] gone. And sometimes the President, you know, would be  
 [12] working in the Oval Office, and at those times there wouldn't  
 [13] be, you know, usually anybody in the outer area.  
 [14] Q In the outer area. You've talked about the area  
 [15] where you've drawn the desk due north of the Oval Office and  
 [16] marked it as "NH," Nancy Hemreich's desk.  
 [17] A Right.  
 [18] Q Sometimes that area that it was in was called  
 [19] Nancy's office?  
 [20] A That's correct.  
 [21] Q Would you also consider it to be part of the  
 [22] reception area, or did it have more of an independent quality  
 [23] of its own?  
 [24] A Well, Nancy could spot anybody usually going in to  
 [25] the Oval Office. She would -- would also -- I mean, if Betty

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[1] wasn't there, she would serve as a checkpoint  
 [2] Q Okay. Would she ever sit at Betty's desk, or she'd  
 [3] just be able to see them going by?  
 [4] A Rarely. She could see them going by.  
 [5] Q Okay. Rarely she would sit at Betty's desk. She  
 [6] could see them going by and --  
 [7] A That's right.  
 [8] Q -- and be a buffer; is that correct?  
 [9] A That's right.  
 [10] Q You mentioned that on a typical morning you would  
 [11] greet the President at some point between him leaving the  
 [12] living quarters and going to his office; is that correct?  
 [13] A That's correct.  
 [14] Q Where would that typically be where you would greet  
 [15] him?  
 [16] A Well, there were a number of places. Normally,  
 [17] if -- if the President was running late on his schedule, I  
 [18] would actually go over to the private residence.  
 [19] Q Okay.  
 [20] A And I might even take the elevator up to his  
 [21] private quarters and begin to brief him there and walk with  
 [22] him over to the office.  
 [23] Q All right.  
 [24] A Sometimes I would be going over, and he would have  
 [25] just come down from the elevator so that we would walk

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[1] usually through this colonnade area, and I would even begin  
 [2] briefing him as we were walking.  
 [3] Q Down the colonnade?  
 [4] A That's right, the area. If he was on schedule,  
 [5] then, usually, right after he walked into the Oval Office, I  
 [6] would be the first one to walk in and see him and then brief  
 [7] him at that time.  
 [8] So it could be any of those things.  
 [9] Q Any of those scenarios you've mentioned?  
 [10] A (Nodding.)  
 [11] Q I know you're nodding your head, but you have to --  
 [12] A I'm sorry, yes.  
 [13] Q Okay. How late would -- I'd earlier mentioned in  
 [14] context of mentioning Ms. Currie and Ms. Hemreich, had asked  
 [15] if they were always there when the President was in the Oval  
 [16] Office -- study or Oval Office Complex.  
 [17] I take it, even if he was outside of those three  
 [18] areas, they didn't just think it was time to go off and a  
 [19] frolic and detour. They would generally stay at their post;  
 [20] is that correct?  
 [21] A Yes, that's correct.  
 [22] Q And, typically, if the President stayed at night,  
 [23] you know, left at 9:00 rather than 6:00, would one of those  
 [24] two ladies typically still be there?  
 [25] A Typically, it would -- yeah, either Betty or Nancy

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[1] would be there during the work week.  
 [2] Q Okay. Now let's take an occasion during the week  
 [3] where one of these ladies would be there. You walk into the  
 [4] Reception Area No. 1. If the door is open from Reception  
 [5] Area 1 to the Oval Office, would you even stop and inquire of  
 [6] Betty Currie or Nancy Hemreich about what the President was  
 [7] doing, or would you just walk right in?  
 [8] A I might not, although I always -- I didn't want to  
 [9] disturb him if it looked like, you know, he was working on  
 [10] something. So my normal pattern was to usually say to Betty,  
 [11] you know, "Is he working on anything in particular?" If I  
 [12] could see him at the Oval Office desk, then I would, you  
 [13] know, I would try not to just barge in on him.  
 [14] On the other hand, if I had -- and they respected  
 [15] this -- if I said I had something urgent to tell the  
 [16] President on information that I had received, then I would go  
 [17] right in.  
 [18] Q All right. You wouldn't even be --  
 [19] A That's right.  
 [20] Q -- buzzed; is that correct?  
 [21] A That's correct.  
 [22] Q Is that whether -- you said that door was typically  
 [23] closed. Would that statement you just made be true whether  
 [24] it was closed or open?  
 [25] A That's correct.

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[1] Q Okay.  
 [2] A Now, I should tell you that on the door into the  
 [3] Oval Office, that is, as we've stated, located at 1:00 --  
 [4] Q Yes.  
 [5] A -- that door does have one of those holes in the  
 [6] door in which you can look into the Oval Office and see what  
 [7] the President is doing, if he's at his desk or if he's not at  
 [8] his desk. You can usually look in. And, normally, what I  
 [9] would do if that door was closed first, is to look in through  
 [10] that hole.  
 [11] Q Okay.  
 [12] A I don't know what they call those things, but --  
 [13] Q Peepholes.  
 [14] A Peepholes? Yes.  
 [15] Q Would there ever be a time when one of the  
 [16] secretaries -- are they -- would you call them secretaries,  
 [17] administrative assistants?  
 [18] A Yeah, assistants, I think, is the more proper  
 [19] designation.  
 [20] Q Okay. Would there ever be a time when -- are they  
 [21] more or less functioning as what is commonly known as maybe  
 [22] an executive secretary or --  
 [23] A That's right. I think they were really personal  
 [24] assistants, executive secretaries. They were functioning in  
 [25] that capacity. I know Betty Currie was placing the calls

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[1] that the President wanted to place. She was -- she handled a  
 [2] tremendous amount of the mail as well as the communication  
 [3] that the President had to conduct.  
 [4] Nancy was doing much the same thing, although  
 [5] Nancy, I would say, was operating as more of an assistant, in  
 [6] the sense that she was normally looking at events and looking  
 [7] at the President's personal calendar, providing him backup on  
 [8] personal notes, personal mail, communications with friends,  
 [9] that type of thing.  
 [10] Q Would you ever walk into Reception Area 1, and the  
 [11] door was closed, and one of these ladies was there, would  
 [12] there ever be an occasion when in that situation you would  
 [13] just walk in, without at least saying to them, "What's he  
 [14] doing?" or, "I've got an important matter I've got to discuss  
 [15] with him?"  
 [16] A Normally, I would say to them, you know, what my  
 [17] business was --  
 [18] Q All right.  
 [19] A -- so that it didn't look like I was just kind of  
 [20] charging in, but that they understood that I had a reason for  
 [21] talking to him.  
 [22] Q Violating your own setup.  
 [23] A Yeah. I mean, the President's entitled to a degree  
 [24] of privacy here, but, obviously, they would never say to me,  
 [25] you know, "Don't go in because" -- particularly if I had

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[1] something serious to discuss with the President.  
 [2] Q Okay. Now, what about the situation where --  
 [3] MR. WISENBERG: Just tell me to stop when it's --  
 [4] THE FOREPERSON: Stop talking now. Your ten  
 [5] minutes are up.  
 [6] MR. WISENBERG: Okay. I'll ask the witness to be  
 [7] excused while we discuss what time we're going to be back.  
 [8] Would you step outside and then we'll let you know.  
 [9] THE WITNESS: Thank you.  
 [10] MR. WISENBERG: Thank you.  
 [11] (Witness excused. Witness recalled.)  
 [12] THE FOREPERSON: Mr. Panetta, I'd like to remind  
 [13] you that you're still under oath.  
 [14] THE WITNESS: I understand.  
 [15] BY MR. WISENBERG:  
 [16] Q The grand jurors have asked me to ask you some  
 [17] things to clear up a few points. Number one, you mentioned  
 [18] that, among other things, the study was used for napping by  
 [19] the President. Do you recall that?  
 [20] A Yes.  
 [21] Q As a general matter, you've testified that the door  
 [22] from Hall 1 to the study was open; is that correct?  
 [23] A Yeah, when I -- when I would walk through there, it  
 [24] was usually open.  
 [25] Q All right. When it would be open, and you would

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[1] see it open, do you know whether or not the President would  
 [2] be in there? The times that you saw it open, do you recall  
 [3] whether or not the President was actually in there at those  
 [4] times?  
 [5] A Yeah, usually not, because what would be happening  
 [6] is, we would be moving either from the Oval Office to the  
 [7] dining room or from the dining room to the Oval Office. It  
 [8] was not -- it was not a place where I normally met with him.  
 [9] If I -- the places I normally met with the President to do  
 [10] business was either the Oval Office or the dining room.  
 [11] Q When he was napping in there, if you know, would it  
 [12] typically be closed, the door from Hall 1 to the study?  
 [13] A Usually it would be.  
 [14] Q All right. When he was in there -- I think your  
 [15] words were resting, regathering, changing, relaxing, speaking  
 [16] on the phone when he wanted privacy from his staff, get away,  
 [17] napping -- would it typically be closed when he was doing  
 [18] those things?  
 [19] A If -- normally, if he was changing or napping or  
 [20] doing some of the work in there where he didn't want to be  
 [21] bothered, then that door would be closed.  
 [22] Q Was it typically closed, to your knowledge, when he  
 [23] was in there, when he actually occupied it?  
 [24] A I think that varied. I think it varied on -- I  
 [25] mean, sometimes it would be closed, but sometimes he would be

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[1] in there -- sometimes I would go back to meet him, and I  
 [2] would find him in the study, and the door would be open.  
 [3] Q Okay.  
 [4] A So it varied.  
 [5] Q In other words, these would be occasions when you  
 [6] would be coming in from the Oval Office --  
 [7] A That's right.  
 [8] Q -- to Hall 1 and then the study?  
 [9] A That's right.  
 [10] Q Okay. Would you ever -- in that kind of an  
 [11] instance when you came in -- you've already come in to the  
 [12] Oval Office through your normal entrance. You've said the  
 [13] doorway from the Oval Office to Hall 1 was usually closed.  
 [14] A Yes.  
 [15] Q So let's take a situation like that. You don't see  
 [16] him in the Oval Office. You see the door to Hall 1 closed.  
 [17] Would you typically have any problem with opening that door  
 [18] in that situation?  
 [19] A Normally I would knock at that door.  
 [20] Q At the hall door.  
 [21] A That's right.  
 [22] Q Okay.  
 [23] A Because at that point I didn't know whether he was  
 [24] in the bathroom or whether was in the study. But I would  
 [25] normally knock, and he might respond.

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[1] Q And if you didn't get a response, you would  
 [2] typically not come in.  
 [3] A Normally that's right.  
 [4] Q Okay. And, I take it then, it would be even more  
 [5] so if the -- I take it then, there's going to be almost no  
 [6] circumstance where you would open that closed door from the  
 [7] Oval Office to Hall 1, a typically closed door -- there would  
 [8] really never be a circumstance when you would open that  
 [9] without getting some response after having knocked; is that  
 [10] correct?  
 [11] A That's correct.  
 [12] Q All right. So we wouldn't have a situation where  
 [13] you go to that door, you knock, you don't hear anything, you  
 [14] walk in and find yourself -- that just wouldn't happen.  
 [15] A Normally what I would do is, I would knock. If I  
 [16] couldn't hear any response from the other side, I might crack  
 [17] that door open a little bit from the Oval Office into the  
 [18] area and then address the President again, say, "Mr.  
 [19] President?"  
 [20] Q Okay.  
 [21] A And if I got -- usually I'd get a response at that  
 [22] point.  
 [23] Q All right. And sometimes you'd be invited in?  
 [24] A Right. Or he'd say, "Just a minute," or, "Come on  
 [25] in."

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[1] Q Okay, all right. Would you ever be told, "See you  
[2] in five minutes," or something like that?  
[3] A Yeah. "Just a minute, I'll be right out."  
[4] Q Okay. Ever any longer period than just a minute,  
[5] like, "I'll get back to you later," or five minutes or ten  
[6] minutes or anything like that?  
[7] A He was usually -- usually if I called in and said,  
[8] "Mr. President," you know, and I would usually mention what  
[9] the issue was, he usually would come out. Sometimes it was  
[10] five minutes, sometimes it might be ten minutes, but it  
[11] wasn't usually much longer.  
[12] Q Okay. When that would happen -- was there ever an  
[13] instance when that would happen -- let me be a little more  
[14] definite. Was there ever an instance where you shouted his  
[15] name or spoke his name, and he indicated that he would be  
[16] with you in a minute or five minutes or ten minutes -- you  
[17] would usually wait in that area?  
[18] A I would -- I'd close the door and wait in the Oval  
[19] Office.  
[20] Q Okay. You would close the door between the Oval  
[21] Office and Hallway 1 and wait in the Oval Office.  
[22] A That's right.  
[23] Q In that situation, when he would finally see you,  
[24] when he would come out, was there an instance when he was not  
[25] alone?

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[1] A No.  
[2] Q Okay. He would always be alone in that situation,  
[3] when you would finally see him.  
[4] A That was -- yes, yes.  
[5] Q Okay.  
[6] A He would usually come out alone and he was, you  
[7] know, either -- if he had come out of the bathroom, he was  
[8] still putting his coat on sometimes.  
[9] Q Okay. Do you recall any situation where he told  
[10] you -- I'm talking about these situations you identified,  
[11] just a minute, five minutes or ten minutes. Was there ever  
[12] such a situation like that when he would ultimately invite  
[13] you into the study after he was ready for you -- to see you?  
[14] A Normally not. Normally he would come out, and then  
[15] we would do our business in the Oval Office.  
[16] Q Okay. Where would he typically be in the study if  
[17] there was a typical time when you might find him in the  
[18] study?  
[19] A Usually, if he had had a particularly exhausting  
[20] schedule, either the day before or he had had a hard time  
[21] sleeping during the night -- and, you know, sometimes he  
[22] would complain about not being able to sleep -- then during  
[23] the -- what we had designated as office time, he might take a  
[24] little time to take a nap, and that would usually be when I  
[25] might find him in that situation.

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[1] Q Okay. Under the circumstances you've just  
[2] described, that is to say, circumstances when you would go  
[3] looking for him beyond the door between the Oval Office and  
[4] Hall 1, would it be possible for somebody else to be in the  
[5] study with him and you not be in a position to see them?  
[6] A Well, obviously, if they had used any of the other  
[7] exits, either going into Walkway 1 out of the dining room, or  
[8] perhaps even using the pantry entrance, then it is possible.  
[9] Q Well, even aside from the question of ingress and  
[10] egress, just as a physical question of -- let's say at the  
[11] point in which you said, "Mr. President," and he said, "Just  
[12] a minute, or five minutes," would it be possible at that  
[13] moment in time when you said that for somebody to be in the  
[14] study and you not have a physical view of them?  
[15] A Yes, it would be possible. Because, as I said, I  
[16] usually stood at the door between the Oval Office and the  
[17] hallway, and if he had responded, I would then close that  
[18] door and wait in the Oval Office.  
[19] Q Was there ever a time during the time you were  
[20] Chief of Staff when you walked into the study through that  
[21] closed study door between Hall 1 and the study without being  
[22] told it was okay by the President?  
[23] A No. Normally I would not enter that area unless  
[24] the President either invited me in or indicated that he was  
[25] going to be coming out.

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[1] Q But do you ever recall a time -- I want to --  
[2] A No.  
[3] Q No, you don't?  
[4] A No, I don't.  
[5] Q In answer to my previous question?  
[6] A That's correct.  
[7] Q You mentioned you would sometimes catch the  
[8] President coming to work down the colonnade; is that correct?  
[9] A That's correct.  
[10] Q If I'm pronouncing that correctly. Is that the  
[11] typical way he would come to work in the morning?  
[12] A Yes. The majority of times when he would come from  
[13] the private residence to the Oval Office, he would walk down  
[14] that colonnade path on the outside, even during the coldest  
[15] weather, and then usually enter the Oval Office at that door  
[16] at 3:00.  
[17] Q Okay. And you're referring to the -- like hands on  
[18] a clock. You're not saying at 3:00 in the afternoon.  
[19] A No, I'm sorry, yeah. It's the door that's located  
[20] at approximately that vicinity.  
[21] Q And would that also be the typical path when he  
[22] would be heading to the living quarters, when he would go  
[23] back?  
[24] A Yes. There were usually two ways that he would go  
[25] back. Sometimes he would go back through that door from the

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[1] Oval Office to the Colonnade. He oftentimes might exit  
[2] through the door in the Reception Area No. 1. That glass  
[3] door was often used to go into the colonnade area.  
[4] Q And that's a door we haven't marked yet?  
[5] A I've marked it as closed. Normally that door was  
[6] closed. I marked it as "C." It's in the Reception Area No.  
[7] 1 in the corner.  
[8] Q Okay. That top right -- near the top right.  
[9] A That's right.  
[10] Q I notice there's a V -- a V-shape --  
[11] A That's right.  
[12] Q -- south of that other door. Do you know what that  
[13] is?  
[14] A That's not a door. There is a window there.  
[15] Q Okay. There's one thing I want to clear up. Let's  
[16] go back to the Oval Office Complex dining room, and you've  
[17] got the "PD" for pantry door, correct?  
[18] A That's correct.  
[19] Q And I think we have marked as closed the door from  
[20] what you think is the pantry into the dining room, correct?  
[21] A That's correct.  
[22] Q Typically closed. And you also said that there is  
[23] a doorway from the pantry out into, you think, Walkway 1.  
[24] A That's correct.  
[25] Q Is that -- what I don't recall is, did you say --

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[1] is that typically closed or open?  
[2] A If the steward is there, that door is usually open.  
[3] Q Okay. If he is not there?  
[4] A Usually closed.  
[5] Q Okay. So why don't we put out in the hallway there  
[6] a "C/O," because that's dependent on the circumstances.  
[7] (The witness marked the document.)  
[8] BY MR. WISENBERG:  
[9] Q Typically closed if he's not there, open if he is  
[10] there, correct?  
[11] A That's correct.  
[12] Q Now, in terms of his general movements -- we've  
[13] talked about when he came to work in the morning and when he  
[14] left. In terms of general movements --  
[15] A If I may just add to my answer.  
[16] Q Yes, sir.  
[17] A As I said, the majority of times he would walk down  
[18] that colonnade and into his offices. There were some times  
[19] when he might walk through the colonnade that you see along  
[20] that -- that upper building there in the map --  
[21] Q Okay.  
[22] A -- and he would access through the hallway where  
[23] that Desk No. 1 is and actually walk around that way to the  
[24] Oval Office. Those were rare, but there were times when he  
[25] would do that.

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(1) For example, if we were already preparing the Oval  
(2) Office for an event, and it was already being occupied by the  
(3) press and the cameramen and other technicians, he would not  
(4) then pass through the Oval Office [REDACTED]  
(5) [REDACTED]  
(6) [REDACTED]  
(7) [REDACTED]  
(8) [REDACTED]  
(9) Q Okay. Through the pantry or through the other one?  
(10) A No, through the [REDACTED]  
(11) Q Okay. Directly from Walkway?  
(12) A That's correct.  
(13) Q All right. And since you said that was usually --  
(14) I believe you testified that was usually [REDACTED] with a  
(15) [REDACTED]  
(16) A That's right.  
(17) Q -- he would have somebody who could [REDACTED] it?  
(18) A Yeah. Normally the security policeman that was  
(19) located in the hall would [REDACTED]  
(20) [REDACTED]  
(21) Q And what you have just described as Hallway, you  
(22) actually marked on the map as Walkway, correct?  
(23) A That's right, I'm sorry, Walkway.  
(24) Q Okay.  
(25) MR. WISENBERG: And you all see that?

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(1) BY MR. WISENBERG:  
(2) Q North of Walkway is -- that's the Desk No. 1 you  
(3) were talking about where the Secret Service sits.  
(4) A That's right.  
(5) Q Okay. And during the day, I take it, he would just  
(6) walk around the -- he wouldn't necessarily usually use the  
(7) [REDACTED] during the day when he's walking around the White  
(8) House?  
(9) A That's correct.  
(10) Q Okay. If he had to leave the Oval Office, would it  
(11) be more typical for him to go out through [REDACTED] or  
(12) more typical to go through -- if you know -- through Walkway  
(13) or Hall into the [REDACTED]  
(14) A During the day, if the President -- it depended on  
(15) the events that he was attending. But during the day, if he  
(16) was attending an event in the Roosevelt Room, or sometimes he  
(17) would have to go over to the Old Executive Office Building  
(18) for events that were scheduled there, he would [REDACTED]  
(19) [REDACTED] that is approximately at  
(20) [REDACTED] on a time clock. That would be the door that would be  
(21) opened up, he would then exit that way.  
(22) Q Okay.  
(23) A Sometimes, if he was going certainly into the  
(24) cabinet room, then he would use the other door that would go  
(25) into [REDACTED].

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(1) Q Okay. So that -- those were usually the [REDACTED]  
(2) he used when he was exiting for events or for meetings.  
(3) The [REDACTED] normally was only used when he  
(4) went to -- over to the [REDACTED]  
(5) Q And how about the door leading into [REDACTED] and then  
(6) into the [REDACTED]? That would not be his usual means of  
(7) ingress and egress?  
(8) A [REDACTED] He used -- I mean, it's not to say he didn't  
(9) use it at times if, you know, we had to go into the [REDACTED]  
(10) [REDACTED] or we had to move quickly to an event over at the [REDACTED]  
(11) [REDACTED], but it was certainly more rarely  
(12) used than the others.  
(13) Q I take it, it would be totally out of line for  
(14) anybody to walk in from [REDACTED] directly into the [REDACTED]  
(15) [REDACTED]  
(16) A That's right. That would -- that would be very  
(17) rare. Now, sometimes if the President was coming out of an  
(18) event in the [REDACTED] and he was being trailed by, you  
(19) know, staff or friends, they might enter into the [REDACTED]  
(20) all through that door.  
(21) When he gives his radio address, he usually gives  
(22) his radio address in the [REDACTED], and then people will  
(23) line up out of the [REDACTED] and enter the Oval Office  
(24) to be greeted by him through that door.  
(25) Q Okay. You mentioned whether or not the pantry door

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(1) -- the door leading from the pantry into Walkway 1. And  
(2) again, you think it's Walkway 1. It's possible it's Walkway  
(3) 2; is that correct? Or are you pretty sure it's Walkway 1?  
(4) A I'm going to stand on -- there's one door to the  
(5) pantry.  
(6) Q Okay, one.  
(7) A I don't know where it's located.  
(8) Q Okay.  
(9) A Maybe a question mark here.  
(10) Q But there's just one door from the pantry to a  
(11) hallway.  
(12) A That's right.  
(13) Q You said it's typically closed when the steward is  
(14) there, open when the steward is there.  
(15) A That's right.  
(16) Q How often is the steward there?  
(17) A The steward is normally there when the President is  
(18) there.  
(19) Q Okay.  
(20) A Because the President would ask for either, you  
(21) know, something to eat, something to drink. Certainly, if he  
(22) was having luncheon there, the steward would have to prepare  
(23) that lunch.  
(24) But the steward was always responding to the  
(25) President's call. You know, if there are people in the Oval

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(1) Office, dignitaries, and he had to prepare either drinks or  
(2) various -- you know, meet various requests of the visitors.  
(3) then the steward would prepare the drinks in the pantry and  
(4) then bring them into the Oval Office.  
(5) Q So the steward is going to typically be there day  
(6) or night if the President's there?  
(7) A I think that the steward is normally there when the  
(8) President's there, although, as I said, on Saturday and, I  
(9) think, late in the evenings, if, you know, the President, for  
(10) example, were to return to the Oval Office, then the steward  
(11) would not be there, if he came back to the Oval Office to,  
(12) you know, work on papers in the evening.  
(13) Or on weekends, normally the steward would get off,  
(14) you know, in the early afternoon and then there would not be  
(15) a steward present if the President went to the Oval Office.  
(16) Q Okay. An example of when a steward might be there  
(17) late at night, would that be something like if you were  
(18) having a meeting, like budget --  
(19) A Right.  
(20) Q -- you know, budget negotiations there.  
(21) A If we had late meetings on issues or we had foreign  
(22) policy issues that were taking us into the evening, then the  
(23) steward would be around to service --  
(24) Q When the stewards weren't around -- I'm sorry, did  
(25) I cut you off?

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(1) A I'm sorry. -- to service the requests of the  
(2) President and others.  
(3) Q When the stewards typically were not there because  
(4) the President wasn't there and they weren't needed -- and I'm  
(5) not talking about when they're off duty, but just when  
(6) they're not in the area of the pantry, where would they  
(7) station themselves, typically?  
(8) A I don't know the answer to that. I think they -- I  
(9) believe that they would go down to the mess facility  
(10) downstairs.  
(11) Q And who were the stewards when you were there as  
(12) Chief of Staff, if you recall?  
(13) A I know who they were. I can't recall their names.  
(14) Q Okay. Does a Mr. Nelvis ring a bell?  
(15) A Yes.  
(16) Q And Mr. Mays ring a bell?  
(17) A Yes.  
(18) Q As the stewards?  
(19) A That's right.  
(20) MR. WISENBERG: Did I touch upon the matters that  
(21) the grand jurors were interested in with respect to layout and  
(22) movement? If I haven't, don't hesitate to --  
(23) (No response.)  
(24) BY MR. WISENBERG:  
(25) Q Were there ever times when the President would be

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[1] at work in the Oval Office before you came to work that  
 [2] you're aware of?  
 [3] A That was rare that he would -- that he would be in  
 [4] the Oval Office before 7:00 in the morning.  
 [5] Q Were there ever times when he was in the Oval  
 [6] Office area, or the areas you've testified he usually was in,  
 [7] before -- while you would have been at work, but before you  
 [8] saw him for the first time in the morning?  
 [9] A I'm sorry, say that again?  
 [10] Q I think you might have partially answered that  
 [11] before. Were there ever instances where he would be in the  
 [12] Oval Office or adjoining areas after you were at work, but  
 [13] before you had seen him for the first time that day?  
 [14] A Oh, yes, yes.  
 [15] Q Okay. That could happen --  
 [16] A That's right. He might -- while I was still  
 [17] holding a staff meeting, the latter staff meeting, he might  
 [18] have come into the Oval Office. But normally they alerted me  
 [19] when he came into the Oval Office so that I could brief him  
 [20] quickly when he came in.  
 [21] Q And the "they" would be who?  
 [22] A "They" would be Betty Currie or Nancy Herreich.  
 [23] Q All right. Tell us a little bit about the White  
 [24] House intern program. What is that?  
 [25] A As best as I understand the intern program, there

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[1] is an Intern Office that operates that program, and at any  
 [2] given time there are approximately 200 to 300 interns that  
 [3] are assigned to various areas throughout the White House and  
 [4] the Old Executive Office Building.  
 [5] I believe that, you know, the number can total as  
 [6] many as perhaps a thousand or twelve hundred during one year.  
 [7] The intern office selects the interns and assigns  
 [8] the interns to the different areas. I was not -- I was not  
 [9] familiar with, nor did I request or select the interns that  
 [10] worked in my office.  
 [11] Q Okay. And you said as many as a thousand might go  
 [12] through in a year.  
 [13] A That is right.  
 [14] Q How many, if you know, would be in the White House  
 [15] itself at any one time? I don't mean like at 3 o'clock in  
 [16] the afternoon, but at a particular -- as opposed to over a  
 [17] whole year a thousand going through, at a typical time how  
 [18] many would be in the White House? What would be your  
 [19] testimony on that.  
 [20] A Well, we -- and by we, it was myself and Evelyn  
 [21] Liebermann, and the deputies -- discouraged having interns  
 [22] wandering through the West Wing of the White House. If they  
 [23] had specific responsibilities within an office that might be  
 [24] fine, but we did not want interns kind of walking through the  
 [25] West Wing on their own volition. They either had some

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[1] responsibility, or they would -- they were delivering  
 [2] material, or what have you.  
 [3] So I have to tell you on a normal -- I mean, I -- I  
 [4] did not normally see a lot of interns in the West Wing of the  
 [5] White House. If you went to the Old Executive Office  
 [6] Building you would see more.  
 [7] Q The -- do you know, do you have any idea -- I  
 [8] didn't mean to confine it to the West Wing, but maybe we  
 [9] should -- can you give an estimate as to how many would be  
 [10] allowed to be somewhere in the West Wing at a given -- on a  
 [11] given day during the time that you were Chief of Staff?  
 [12] A That is very difficult for me to answer.  
 [13] Q Okay. I mean, obviously, from what you have told  
 [14] us, less than a hundred?  
 [15] A Oh, yes.  
 [16] Q Less than fifty?  
 [17] A Yes.  
 [18] Q Less than twenty?  
 [19] A Well, I mean, the West Wing is a big place, it is  
 [20] both -- you know there are three floors there, both  
 [21] underneath the floor we have just described, as well as a  
 [22] third floor above it, so it is really difficult for me to  
 [23] say, you know, where the interns might be located.  
 [24] But, at least as far as I was concerned, I -- I had  
 [25] very limited access to interns and did not see that many

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[1] there.  
 [2] Q Okay. So you wouldn't have even seen in your area  
 [3] of the West Wing even -- even anywhere near twenty?  
 [4] A That is right.  
 [5] Q All right. What would be -- I would take it --  
 [6] and, again, in your area of the West Wing -- and we  
 [7] understand you are very high up, as the Chief of Staff --  
 [8] would you typically see -- would it be more like even under  
 [9] ten, or between ten and twenty?  
 [10] A In what area again? I'm sorry.  
 [11] Q The general area you operated in when you were  
 [12] Chief of Staff, physical area that you operated in on a daily  
 [13] basis.  
 [14] A As I said, I -- I discouraged the use of interns in  
 [15] that area, because I have always -- you know, I appreciate  
 [16] the fact that interns have the opportunity to work in the  
 [17] White House, but work that is done in the White House is very  
 [18] sensitive and I was very concerned about the use of interns  
 [19] on a regular basis. Particularly in the Chief of Staff's  
 [20] office.  
 [21] Now there were occasions where, I think, we used  
 [22] interns as backup to answer phones, particularly during the  
 [23] government shutdown. During the government shutdown we had  
 [24] to -- in response to the orders that were issued had to  
 [25] eliminate some of our hired staff, they could not work, and

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[1] so we did use interns to respond to the telephones.  
 [2] Then in, you know, maybe a few other times. But  
 [3] that was the limit of their activity in my office.  
 [4] Q And when you say your office, would that include --  
 [5] A The Reception Area.  
 [6] Q Reception Area No. 2?  
 [7] A Yes, Reception Area No. 2.  
 [8] Q Okay. Now, what about the -- distinguishing your  
 [9] office from the -- from the Oval Office Area, or was that --  
 [10] I'm trying to -- you are focusing on the Chief of Staff?  
 [11] A Yes.  
 [12] Q The Chief of Staff's office. How about the Oval  
 [13] Office, Oval Office complex, Reception Area 1, Study, the  
 [14] area you have talked about is the most -- as an area -- the  
 [15] most kind of private area, how many interns, typically,  
 [16] there?  
 [17] A None.  
 [18] Q Okay. And then, unless there is an unusual  
 [19] circumstance like the shutdown, none in your area; is that  
 [20] correct?  
 [21] A That is correct.  
 [22] Q When was the shutdown? Was that -- was that fall  
 [23] and -- fall and winter, fall and late fall of '95?  
 [24] A It was January, I think early January of '95, if I  
 [25] recall correctly, that we had the government shutdown.

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[1] Q All right.  
 [2] A Because we were in budget negotiations at the time,  
 [3] and I think that would have been -- it was during the  
 [4] Christmas period, but it extended into January of '95.  
 [5] Q Okay. So I was off by about a year.  
 [6] A I believe that is right.  
 [7] Q Yeah.  
 [8] A JUROR: Ninety-six.  
 [9] FOREPERSON: Ninety-six.  
 [10] A JUROR: Somewhere in '96.  
 [11] (Simultaneous speaking by jurors.)  
 [12] A I guess that's right. I'm sorry, yeah, because --  
 [13] well, yeah -- no -- I'm sorry, the election was in '94, and  
 [14] it was actually a year afterwards that we had the shutdown.  
 [15] So let me correct myself. I think it was January of '96.  
 [16] Q Okay. And had there been -- had there been a  
 [17] briefer -- like one day shutdown the Thanksgiving before that  
 [18] January of '96?  
 [19] A I believe there had been. I think there were two  
 [20] periods of a shutdown we had at that time.  
 [21] Q All right. The -- do you recall how many interns  
 [22] went to work for you during that period, if -- I mean --  
 [23] A I believe at most maybe two, but generally there  
 [24] was -- there was one. My regular assistant is Jennifer  
 [25] Palmura, and she was always on duty for me, so that if

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(1) someone was answering the phone it was usually one other  
 (2) intern that was doing that.  
 (3) Q Okay. So it could be as -- as few as one at a  
 (4) time?  
 (5) A That is correct.  
 (6) Q Do you know whether or not Monica Lewinsky was one  
 (7) of the interns who manned the phones during either of the  
 (8) shutdown periods?  
 (9) A I -- I believe she was, and I didn't -- I mean, I  
 (10) did not recollect that until I obviously saw her photograph  
 (11) as a result of the disclosures that had come out. And then I  
 (12) recall that she was one of those that had come over for, I  
 (13) think, a couple days to answer the phone.  
 (14) Q Okay.  
 (15) A In that reception area, called -- designated  
 (16) Reception Area No. 2.  
 (17) Q Okay. A couple of days to answer the phone?  
 (18) A That is right.  
 (19) Q Would that have been -- would that have been the  
 (20) first time you met Monica Lewinsky?  
 (21) A That is correct.  
 (22) Q Now --  
 (23) A Because, again -- just so -- for the record here,  
 (24) the interns that were assigned to the Chief of Staff's  
 (25) office, which would number, as I understand it, somewhere

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(1) between perhaps six or eight at the most, they would work at  
 (2) the Old Executive Office Building, handling mail in the Chief  
 (3) of Staff's office. So I would rarely see the interns that  
 (4) worked for me.  
 (5) Q The -- how many levels are there at the White  
 (6) House, levels in terms of floors?  
 (7) A At the -- in the West Wing, the area that we have  
 (8) been talking about --  
 (9) Q Okay.  
 (10) A -- there are three levels. And underneath the area  
 (11) we are talking about is an area where there is the Mess, plus  
 (12) the -- the National Security Office locations, the situation  
 (13) room for foreign policy discussions is located in that area  
 (14) below. The Mess, and then various offices of staff members  
 (15) are spread out throughout that area as well.  
 (16) On the third floor, there are additional offices  
 (17) that largely contain the rooms -- there are three main areas.  
 (18) One is the Counsel's office on the third floor, the second  
 (19) large area is the Legislative Assistance area, and all of the  
 (20) Legislative people that work under that individual. And then  
 (21) the third area is the Economic area, the National Economic  
 (22) Counsel has its offices up there as well.  
 (23) There are others, but those are the main ones.  
 (24) Q Okay. Now just so we are not confused, a  
 (25) particular map we have here that is our copies of LP-1, at

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(1) the top right it says "first floor." Is -- is the -- is the  
 (2) map we are looking at, at least except for the areas that say  
 (3) upper level and lower level -- off to the right -- is the map  
 (4) we have been dealing with and the rooms we have been dealing  
 (5) with, are they -- are they considered -- are they called the  
 (6) first floor?  
 (7) A Yes, they are.  
 (8) Q Okay. But they are actually the middle level of  
 (9) the West Wing?  
 (10) A That is right.  
 (11) Q Okay. And what do they call then the lower level?  
 (12) If they call it anything other than lower level?  
 (13) A Well, I used to call it the basement.  
 (14) Q Okay. And then --  
 (15) A The third floor.  
 (16) Q The third floor. So there is nothing called the  
 (17) second floor?  
 (18) A Not really.  
 (19) Q On the West Wing?  
 (20) A I mean that's -- that may have been my problem  
 (21) (chuckling.) I'm sure the elevator probably says two, but  
 (22) I -- I used to always call it the third floor.  
 (23) Q Okay. So the third floor, first floor, basement in  
 (24) the West Wing. And then there is another level in the -- in  
 (25) one of the other wings, correct?

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(1) A I'm sorry?  
 (2) Q There is another -- is there an extra level on --  
 (3) not in the West Wing of the White House?  
 (4) A (No response.)  
 (5) Q You said there are three levels in the West Wing?  
 (6) A That is right.  
 (7) Q Is there another level in the East Wing?  
 (8) A Yes. There are offices over in the East Wing, as  
 (9) well. The First Lady's offices are located over there, and I  
 (10) believe there -- there are Legislative -- part of the  
 (11) Legislative offices are located in the East Wing as well.  
 (12) Q But is there an extra level, in terms of --  
 (13) A I believe there is. I am not that familiar with  
 (14) the East Wing, since I spent all my time in the West Wing.  
 (15) Q Okay.  
 (16) A But I believe there is a second level.  
 (17) Q You are not saying the First Lady's office is in  
 (18) that extra -- on that extra level?  
 (19) A No.  
 (20) Q Okay.  
 (21) A I have never actually been to the First Lady's  
 (22) office.  
 (23) Q Okay.  
 (24) A On that side.  
 (25) Q Okay. But on the West Wing --

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(1) MR. WISENBERG: Let the record reflect Mr. Udoff  
 (2) has entered the Grand Jury room.  
 (3) On the West -- West Wing, which you have called the  
 (4) third floor of the West Wing you have got -- you mentioned  
 (5) Legislative, something about Legislative matters, is that  
 (6) called -- is that also called Office of Legislative Affairs?  
 (7) A That is correct.  
 (8) Q Okay. And you have got White House Counsel's  
 (9) Office?  
 (10) A That is right.  
 (11) Q And the Economic area; is that -- Economic --  
 (12) A National Economic Counsel Area.  
 (13) Q Okay. Economic Counsel Area. And who were the  
 (14) White House Counsel when you were there?  
 (15) A The White House Counsel --  
 (16) As Chief of Staff.  
 (17) A -- when I was Chief of Staff were Lloyd Cutler --  
 (18) was there for an initial period, then Ab Mikva came in, and  
 (19) then --  
 (20) Q Mr. Quinn?  
 (21) A Mr. Quinn.  
 (22) Q Okay.  
 (23) A Frank (sic) Quinn.  
 (24) Q And was Mr. Quinn still there when you resigned?  
 (25) A That is correct.

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(1) Q Okay.  
 (2) A Jack Quinn.  
 (3) Q All right. From what you said earlier about the  
 (4) interns, what is the -- is this -- this area (indicating) of  
 (5) the West Wing that we have been looking at on this plan, is  
 (6) this what you would call the -- is this known as the southern  
 (7) half of the West Wing, or is there any designation that you  
 (8) are aware of like southern half of West Wing?  
 (9) A I'm not familiar with that term.  
 (10) Q Okay. This whole area is what you would call the  
 (11) West Wing of the first floor; is that correct?  
 (12) A That is correct.  
 (13) Q Again, aside from areas that are designated as  
 (14) upper level and lower level?  
 (15) A That is correct.  
 (16) Q Over on the right here (indicating)?  
 (17) A That is correct.  
 (18) Q Okay. From what you have said about the Intern  
 (19) Program then you have nothing to do -- I take it -- with the  
 (20) hiring of the interns?  
 (21) A No.  
 (22) Q The -- are you typically responsible for firing of  
 (23) interns?  
 (24) A Well, normally, the intern office itself oversees  
 (25) the -- you know, the behavior of the interns, but it would

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not be out of the question that if we saw an intern either not acting appropriately, or being out of line, that we would not take steps to deal with that.

Q When you would do that, would you typically go through the interns office itself, or would you sometimes just act even without doing -- without going through the interns office?

A Well, normally my Deputy responsible for personnel would -- would deal with that, and I would imagine she would at least inform, or tell, the intern office what should happen.

Q Okay. So if you see something that -- if you see something that bothers you, or if somebody in your office sees something that bothers you and let's you know about it, you are not going to hesitate to take steps to remove or fire the --

A Yes, that is -- that is right. I was not going to say, "Please," to the intern office. We were going to tell them that action needed to be taken.

Q And what is it that the interns typically do? Or is there a typical thing, because they are in so many different areas of the EOB?

A Well, again, it can vary. But if, you know, for example they were not dressing appropriately, or they were not behaving appropriately, or they were yelling, or

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shouting, or not acting in a mature manner, or -- you know -- were -- if we had found out that an intern had somehow been involved with the local police, I mean those are all the kinds of things that would concern us.

And, if it came to my attention or the attention of, as I said, my Deputy, we would not hesitate to take action.

Q My question was -- was not -- was not clear enough. What I meant to ask you was what are the typical duties of an intern.

A I'm sorry.

Q Is there any way -- is that so broad that there is no way you can really characterize that?

A I think it varies. You would almost have to ask every office that is assigned interns what responsibilities they gave them.

Q How long is the typical tenure of a White House intern?

A Normally, my understanding is that it is for approximately a quarter, which would be, you know, three -- three months, three to four months.

Q What happens to most of them when they leave?

A Normally the interns -- again, as far as I know -- would return -- the purpose of the intern program is to give young people exposure to the White House, and to its

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operations, and then usually they return back to their schools.

Q The -- are they typically -- are they typically then college students, or are they between college and graduate school, or professional school?

A I think -- again, it can vary, but I think typically they are college age.

Q I take it they are not typically jobs of great responsibility?

A They certainly shouldn't be.

Q They should not be?

A No.

Q Are they more -- are they more honorary type jobs?

A Yeah, I think they -- they are jobs that generally involve, you know, moving paperwork, or, you know, answering phones. Or, you know, dealing with usually areas that can be supervised. That is what one would hope. That certainly was the case with regards to my office.

Q Is it considered to be a -- a plum -- for want of a better word -- for somebody to become a White House intern?

A I think -- I think it is an honor for someone to be selected to work in the Intern Program, and then to have the opportunity to work in the White House. That's -- that is an honor for anyone who is selected, and they ought to view it as an honor because not many people had that -- you know,

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that kind of access.

Q How exclusive is it, in terms of -- do you know, for instance, does one out of every ten applicant make it, or is it --

A I don't know.

Q You don't know that?

A No.

Q Now is this the same as a White House Fellow? Do they still have something called the White House Fellows?

A No. I think the fellowship program, or the White House Fellows program, that is separate and apart from the intern program.

Q That -- and that would be far more exclusive; is that correct?

A That is correct. That is -- normally, the fellowship program, as I understand it, is one in which you have people that first of all have -- are usually much more mature, have more training, and will actually be assigned to a position for a longer period of time.

Q The -- they are later -- they are -- typically, these people are later on in their professional career; is that correct?

A That is correct. Normally, for example, someone who is working at the State Department want -- may want to become a Fellow, and then -- as part of their career

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development, and might enjoy working in the National Security operation, as an example.

Q I don't mean to suggest there is anything wrong with this, but I -- I take it that political connections can play a part in helping one get a White House internship; is that correct?

A Well, I -- I never selected interns for my office, but I think it is fair to say that if someone who -- you know, was a supporter of the President wanted to try to do something for a family member that that would count for something.

Q You -- and from what you said, you would not typically evaluate -- assuming there is an evaluation of an intern -- and I don't know that there is, if they are only there for three months -- but assuming there is some kind of an evaluation like an employee would get you would not typically do that?

A No.

Q Except for the extent that transferring or firing, an evaluation of sorts?

A If there -- if there is a quick evaluation then we would act on it. But --

Q You would call that "an on the spot evaluation"?

A That is correct.

Q You said that you believe you remember -- actually,

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you said you remember now from seeing her picture on the television that -- that Ms. Lewinsky was one of these interns who filled in during the time period of the budget shutdown; is that correct?

A That is correct.

Q And we have identified the budget shutdown, I believe, of January 1996, and a -- and a briefer shutdown around Thanksgiving of '95; is that correct?

A Right. But I do not recall her doing the first shutdown, working in the office the first shutdown. I believe it was in the second shutdown she worked there.

Q All right. Do you have any idea whether or not they actually do have evaluations of interns?

A I do not. I mean, I would --

Q You don't?

A I would suspect that they would, because they -- I mean, I think the intern office would want to keep track of how interns were doing. But I cannot tell you of my own knowledge that that is the case.

Q How typical is it, in your experience and your knowledge, for an intern to get a paid job at the White House directly after his or her internship?

A It can -- it could happen if the intern was someone who was particularly responsible and did a good job, and wanted to -- you know -- to move on to a position. I have to

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[1] use an example.  
 [2] The office that I had on Capitol Hill, as a  
 [3] Congressman, if there was an intern who came in who was very  
 [4] good and did their job very well, that we might very well  
 [5] consider that intern for -- you know, for a job. For a more  
 [6] permanent job.  
 [7] And I -- I think that might be the case in the  
 [8] White House as well.  
 [9] Q Do you -- so if I understand your testimony -- I  
 [10] don't want to put words in your mouth, so correct me if I got  
 [11] it wrong, it is not typical but it could happen if -- if a  
 [12] person was very responsible, had done a standout job?  
 [13] A That is correct.  
 [14] Q You have told us how -- that generally you didn't  
 [15] want interns in this area, you didn't want them in either the  
 [16] Chief of Staff area, or the area around the Oval Office; is  
 [17] that correct?  
 [18] A Yeah. I mean I -- I mean, just so you understand,  
 [19] I did not want staff to be wandering through there.  
 [20] Q Much less interns?  
 [21] A Much less interns.  
 [22] Q All right. Was -- was one effect of your being  
 [23] Chief of Staff that there was tighter rein on interns, as  
 [24] well as staff? Is --  
 [25] A I believe -- well, I mean, to the extent that we

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[1] were -- we were controlling staff, we certainly would have  
 [2] controlled interns.  
 [3] Q There wasn't a specific intern problem that you  
 [4] remember?  
 [5] A No.  
 [6] Q That you wanted to solve?  
 [7] A That is right.  
 [8] Q But -- strike that. Were there -- when would the  
 [9] interns, if at all, typically then interact with the  
 [10] President? Would it be just on ceremonial occasions, or to  
 [11] have a picture taken once or twice during their tenure?  
 [12] A Yeah. It would normally be when the president  
 [13] would take -- take a photograph with the interns, or,  
 [14] obviously, if there were events on the south lawn, you know,  
 [15] interns might well be invited to attend those events, or  
 [16] perhaps even receptions in the White House.  
 [17] But it was largely those occasions that the  
 [18] President would interact with the interns.  
 [19] Q So, fair to say overwhelmingly on ceremonial type  
 [20] occasions?  
 [21] A Ceremonial, social occasions.  
 [22] Q Do you recall any interns during the time that you  
 [23] were Chief of Staff being fired? I want to make it -- and  
 [24] let me just say I want to make a distinction between fired  
 [25] and transferred.

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[1] Do you recall any interns being fired, while they  
 [2] were in an intern status?  
 [3] A Well, I mean, I recall that Evelyn Liebermann would  
 [4] oftentimes, you know, express concern about either a  
 [5] particular intern or -- I mean, she was -- she was a tough  
 [6] disciplinarian, and, you know, if someone did not dress  
 [7] correctly, or if they behaved inappropriately, she would not  
 [8] hesitate to act to -- you know, to discipline them in some  
 [9] way.  
 [10] What that particular action would be, I -- I cannot  
 [11] define all the particular steps she may have taken to  
 [12] discipline people. But she would definitely discipline  
 [13] people on a regular basis.  
 [14] Q The -- do you recall any being fired during your  
 [15] tenure, that you were aware of? Any interns.  
 [16] A Fired, you mean being --  
 [17] Q Asked to leave the --  
 [18] A -- expelled --  
 [19] Q -- program?  
 [20] A -- from the program? I cannot recall a particular  
 [21] instance. It wouldn't surprise me if there were some, but I  
 [22] can't recall this particular instance.  
 [23] Q Do you recall any interns being transferred from  
 [24] one area physically to another while you were Chief of Staff?  
 [25] A Do -- I do -- I mean, I do recall in this

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[1] particular instance that -- that Evelyn Liebermann expressed  
 [2] concern about the behavior of Monica Lewinsky.  
 [3] Q Okay. Now was that while -- you know we have  
 [4] got -- were you aware that after she was an intern she took a  
 [5] paid position in this Office of Legislative Affairs you have  
 [6] talked about?  
 [7] A I -- I'm aware of it now, and I did see her  
 [8] periodically, I think in the halls, sometimes when I would  
 [9] walk through the halls. So I -- I had assumed that she must  
 [10] have gotten a job some place, or at least was still, you  
 [11] know, operating as an intern.  
 [12] Q Okay. But you didn't know at the time that she was  
 [13] in the Office of Legislative Affairs?  
 [14] A No.  
 [15] Q Which, again, you have told us is on the West Wing  
 [16] but on what you have called the third floor, one level up  
 [17] from the first floor?  
 [18] A And I want to also make clear again that I believe  
 [19] there is a branch of that office in the East Wing.  
 [20] Q Okay. A branch of what office?  
 [21] A The Legislative Office.  
 [22] Q Okay. So we -- and you -- obviously, since you  
 [23] didn't -- weren't even sure she was in the office -- I'm  
 [24] going to call it the O-L-A, is that okay?  
 [25] A That is fine.

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[1] Q You all call it that ever?  
 [2] A I don't think so.  
 [3] (Laughter.)  
 [4] Q Okay. The -- you don't -- since you didn't even  
 [5] know she was in OLA you don't know whether she was in the  
 [6] West Wing OLA office or the East Wing OLA office?  
 [7] A That is correct.  
 [8] Q Okay. Let's talk about since you recall --  
 [9] A I mean, I have to tell you, I -- I would sometimes  
 [10] go up to the West Wing of the Legislative Office, to deal  
 [11] with the Legislative Assistant, the Presidential Assistant in  
 [12] charge of Legislative Affairs, and I do not recall seeing her  
 [13] up there.  
 [14] Q Monica Lewinsky?  
 [15] A That is correct.  
 [16] Q Okay. You said that you recalled incidences with  
 [17] Evelyn Liebermann and -- and -- and may I just ask -- let  
 [18] me -- let me strike that question.  
 [19] MR. WISENBERG: And -- and -- I'm oblivious to  
 [20] everything but the questioning, so when you -- I would ask  
 [21] when it is break time if you would just shut me up, please,  
 [22] Madam Foreman.  
 [23] FOREPERSON: Okay. I would be happy to.  
 [24] MR. WISENBERG: Thank you.  
 [25] (Laughter.)

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[1] Q The -- you say that you remember -- you do rememb  
 [2] an incident where Evelyn Liebermann was concerned about  
 [3] Monica Lewinsky?  
 [4] A Yes.  
 [5] Q Okay. Now, can you tell us about that, with a  
 [6] focus on what Monica Lewinsky was doing. In other words, was  
 [7] she an intern still, or had she gone somewhere else?  
 [8] A I believe at that point she was in the Legislative  
 [9] operation.  
 [10] Q Okay. And you are basing this partly on hindsight,  
 [11] or just your memory that she wasn't an intern?  
 [12] A That is correct. It is just my -- my memory that  
 [13] she was not an intern. I think I would have remembered that,  
 [14] because she was, obviously, an intern working in the Chief of  
 [15] Staff's office.  
 [16] But at the time that Evelyn Liebermann talked to me  
 [17] that was not the case.  
 [18] Q Okay. And -- and what do you remember about --  
 [19] A I remember --  
 [20] Q -- this incident?  
 [21] A -- Evelyn Liebermann coming to me and saying that  
 [22] she did not like the behavior of -- of this individual,  
 [23] Monica Lewinsky. I -- she didn't use her name, very frankly,  
 [24] at that time, she said, "There is someone that I don't like  
 [25] their behavior, they are hanging around." Were the terms

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[1] that she used. "And they are spending too much time around  
[2] the West Wing."  
[3] Q There -- you said -- pardon me for interrupting  
[4] you, but you said "their," you mean she?  
[5] A She.  
[6] Q Okay.  
[7] A "She is spending too much time around the West  
[8] Wing, and I'm going to move her."  
[9] Q Okay.  
[10] A And I -- I had complete trust in Evelyn's judgment.  
[11] Any time she acted, I trusted her judgment. I wish I had  
[12] more Evelyn Liebermann's working in the White House, because  
[13] she was such a tough disciplinarian. If she saw somebody, as  
[14] I said, who was not dressed correctly she would discipline  
[15] that person.  
[16] I have seen her discipline the press, who if they  
[17] had their cameras in the wrong place, I mean, she told them  
[18] where to place their cameras, she would go out there and tell  
[19] them to move them.  
[20] Q Okay.  
[21] A So I trusted her judgment, and when she told me  
[22] that I said, "Fine."  
[23] Q All right. She didn't like her behavior, and/or  
[24] she was hanging around the West Wing too much?  
[25] A That is right.

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[1] Q Did she get more specific than that?  
[2] A No, it was basically that, and that, you know, she  
[3] didn't like the appearance that it was creating.  
[4] Q All right. What kind of an appearance?  
[5] A I think just, you know, the appearance of someone  
[6] hanging around, and gawking, and -- you know, trying to see  
[7] the President.  
[8] Q All right. Did she complain that -- or express  
[9] concern that Monica was trying to be -- not only to gawk at  
[10] the President but to -- to be around the President?  
[11] A Yeah -- I think it was -- I mean, her terms was, "I  
[12] don't like her hanging around."  
[13] Q All right. Did she specifically mention the Oval  
[14] Office?  
[15] A No, she never mentioned the Oval Office.  
[16] Q All right. What kind of behavior, other than just  
[17] trying to -- when we say the West Wing, I take it you mean  
[18] the West Wing, first floor?  
[19] A That is correct.  
[20] Q What -- what -- other than that -- what behavior  
[21] other than hanging around the first floor of the West Wing  
[22] and gawking at the President?  
[23] A I don't -- I don't remember her adding much more  
[24] right -- as I said, I didn't even recall her using the name  
[25] of the individual. There was just -- it was enough for me

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[1] that she didn't like this person just hanging around there,  
[2] and wanted to move her out, I said, "Fine."  
[3] Q Did she express a security concern?  
[4] A Security concern would be obvious, but I can't  
[5] remember her stating that. But, obviously, anybody who is  
[6] hanging around the West Wing without any specific mission or  
[7] responsibility one has to be concerned about why they are  
[8] there.  
[9] Q Did you -- did you fear that -- did she suggest  
[10] that she heard anything about any particular -- or did she  
[11] state that she had heard anything about any particular  
[12] incidents involving Monica Lewinsky and the President?  
[13] A No.  
[14] Q Were you concerned -- strike that. Did she mention  
[15] that she had heard that there was a relationship of any kind  
[16] between Monica Lewinsky and the President?  
[17] A No.  
[18] Q Did she have to say that? Would that have been  
[19] something, based upon what she said to you, that would have  
[20] been an automatic concern to you and Ms. Liebermann?  
[21] A I -- well, again, it was more the appearance of  
[22] having somebody hanging around there that concerned us. And,  
[23] for that reason, you know, we would act on it. Because of  
[24] the concern about the appearance of somebody doing that.  
[25] Q Okay. Tell us what you mean -- tell us what you

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[1] mean by -- and I know appearance seems like a clear word --  
[2] but tell us exactly what you mean by appearance.  
[3] A Well, let me -- let me be clear. Obviously, in  
[4] going into this position as Chief of Staff, I was aware of  
[5] the -- of the rumors and the allegations that involved the  
[6] President -- beginning as Governor -- with Gennifer Flowers  
[7] and Paula Jones, and, you know, just the general rumors that  
[8] had surrounded the President.  
[9] And, as a result, we took particular precautions to  
[10] insure that there was never the appearance of the President  
[11] being with somebody, so that it could be misinterpreted, by  
[12] the public or anybody else.  
[13] So that, on trips, for example, if an acquaintance  
[14] wanted to drive with the President we would say, "No." If  
[15] there was a female acquaintance who wanted to greet the  
[16] President we would say, "No." And we just took precautions  
[17] like that because of, again, the appearance, that we wanted  
[18] to protect the President's office and protect his integrity.  
[19] Q The -- did you ever discuss that with the  
[20] President, doing those kind of things?  
[21] A Yes.  
[22] Q And what would those discussions be?  
[23] A I mean, the President was always very cooperative.  
[24] If we said, "Look, you know we don't want you --," even if it  
[25] was an old friend that he knew from his -- his days as

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[1] Governor, we would say, "You know what the problem is, it  
[2] creates the wrong appearance and it shouldn't happen." And  
[3] he would say, "Fine."  
[4] Q Okay.  
[5] A He never resisted.  
[6] Q When a particular issue would come up about  
[7] greeting somebody, or something like that?  
[8] A Yes. I mean, you know -- Barbra Streisand wanted  
[9] to come in and meet him at a certain place, and we thought it  
[10] was not appropriate, we would tell him so and -- and he would  
[11] agree.  
[12] Q I realize these are sensitive -- very sensitive  
[13] questions, if there is ever any time you want to take a break  
[14] feel free to let us know.  
[15] FOREPERSON: Actually, Sol, now would be a good  
[16] time for us to take a break.  
[17] MR. WISENBERG: Okay.  
[18] FOREPERSON: Ten minutes.  
[19] MR. WISENBERG: Thank you. May the witness be  
[20] excused?  
[21] FOREPERSON: Yes.  
[22] (Witness excused for brief break.)  
[23] MR. WISENBERG: Are we ready to bring the witness  
[24] back?  
[25] JURORS: Yes.

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[1] FOREPERSON: Mr. Panetta, I would like to remind  
[2] you once again that you are still under oath.  
[3] THE WITNESS: Thank you.  
[4] BY MR. WISENBERG:  
[5] Q And let the record reflect that Mr. Panetta has  
[6] reentered, and you are the same Mr. Leon Panetta who has been  
[7] testifying here all day; is that correct?  
[8] A That is correct.  
[9] Q The -- we were talking about this incident where  
[10] Ms. Liebermann -- who was your Deputy at the time?  
[11] A That is correct.  
[12] Q Spoke to you about Monica Lewinsky; is that  
[13] correct?  
[14] A That is correct.  
[15] Q The -- and you mentioned that there was an  
[16] appearance problem --  
[17] MR. WISENBERG: Let the record reflect that Ms.  
[18] Wirth has just entered the grand jury room.  
[19] A -- Again to make clear for the record, she did not use  
[20] Monica Lewinsky's name at the time, just said that there was  
[21] a problem with an intern.  
[22] Q Okay. What makes you --  
[23] A That I now know to be Monica Lewinsky.  
[24] Q Okay. How do you now know it to be Monica  
[25] Lewinsky, from the picture again?

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[1] A That is correct.  
 [2] Q Okay. So you had at least seen this person --  
 [3] A That is right.  
 [4] Q -- around by this time period; is that correct?  
 [5] A That is right.  
 [6] Q By the time period when Evelyn Liebermann came to  
 [7] you, correct?  
 [8] A That is correct.  
 [9] Q You mentioned security, and, obviously, I take it  
 [10] you mean that it -- it goes without saying that that is  
 [11] automatically a security type problem; is that correct?  
 [12] A That is correct. You really, you know, should not  
 [13] have -- as I said -- either staff or interns, or anyone else  
 [14] for that matter, located in the West Wing because of --  
 [15] because of security, but also because I think it then  
 [16] undermines discipline with regards to the rest of the staff.  
 [17] Q You say located in the West Wing, or located in,  
 [18] gawking, either, or both?  
 [19] A Both.  
 [20] Q Because, again, you didn't want just people --  
 [21] A I didn't -- I didn't want people located there.  
 [22] Q Okay. But there was -- was there any particular  
 [23] concern with this individual, that you were worried for  
 [24] the -- any articulation by Ms. Liebermann, "I'm worried that  
 [25] she might harm the President." Was there any articulation --

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[1] A No.  
 [2] Q Okay. Now again, she was a staffer by this time,  
 [3] she was not a -- she was not an intern, correct?  
 [4] A That is what I understand now to be the situation.  
 [5] Q And how often do you recall seeing her, Monica  
 [6] Lewinsky? Let's take -- you have told us you -- strike that.  
 [7] While we are on this topic, let me ask you how many other  
 [8] instances when you worked at the White House did you have  
 [9] somebody approach you in the way that Ms. Liebermann did, and  
 [10] say there is a problem with a particular -- a particular  
 [11] individual?  
 [12] A Had Ms. Liebermann -- Ms. Liebermann approached me  
 [13] on others --  
 [14] Q Okay.  
 [15] A -- by that, in which she would say there is -- you  
 [16] know, "There is a problem with this individual." Or, "There  
 [17] is a problem with that person." "This person is not doing  
 [18] their job." Or, "I don't like the way that person looks."  
 [19] Or --  
 [20] Q Okay.  
 [21] A She would --  
 [22] Q But I'm talking about the particular --  
 [23] A She was a good -- she was a good first sergeant,  
 [24] you know.  
 [25] (Laughter.)

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[1] Q But I'm talking about the particular issue that you  
 [2] have identified, the appearance, the appearance issue you  
 [3] have talked about.  
 [4] A This -- this particular instance, I don't recall  
 [5] any other. In other words, where somebody was just hanging  
 [6] around the West Wing.  
 [7] Q All right. But I want to be as precise as I can.  
 [8] There is only one instance you remember involving somebody  
 [9] hanging around the West Wing, correct? Other than Monica.  
 [10] But -- but my precise question is -- well, first of all let  
 [11] me stop there.  
 [12] Is that -- is that correct?  
 [13] A To the best of my recollection -- I mean, I --  
 [14] if -- I -- the best I can remember is that -- I mean I recall  
 [15] this one instance, but I don't want to say that -- you know,  
 [16] it may well have been that Ms. Liebermann came to me and may  
 [17] have referred to some others that -- you know, in terms of  
 [18] walking through the West Wing, or not, you know, having too  
 [19] much -- but this is the one I clearly remember.  
 [20] Q Okay. Now, a slightly different question. Was  
 [21] there any other person you remember -- and by definition it  
 [22] would be female -- given the problem you have identified, the  
 [23] appearance problem, about the President, I think you  
 [24] mentioned Gennifer Flowers -- was there any other person --  
 [25] irrespective of whether or not they were hanging around the

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[1] West Wing and gawking -- was there any other person who Ms.  
 [2] Liebermann or anyone else came to you about on this  
 [3] appearance issue that you have identified?  
 [4] Is my question clear?  
 [5] A Any other than this one instance?  
 [6] Q Yes.  
 [7] A Well, I mean, there were times when she would say  
 [8] she did not -- you know, if someone, for example, wanted to  
 [9] get on Air Force One that she did not want that person on Air  
 [10] Force One. And, I mean I can remember some instances like  
 [11] that, where she --  
 [12] Q Okay.  
 [13] A -- would say that, and -- you know -- and that --  
 [14] and I would -- if that person didn't have a policy  
 [15] responsibility I would -- I would agree with her.  
 [16] Q Okay. Let's -- let's -- so she would -- there was  
 [17] at least -- there were more than -- there was more than the  
 [18] Lewinsky occasion, in a global sense?  
 [19] A That is correct.  
 [20] Q Not just a sense of an employee at the White House?  
 [21] A That is right.  
 [22] Q Where Ms. Liebermann expressed a concern that, "I  
 [23] don't want this person at a particular location, or on a  
 [24] particular trip," because of what we are going to call the  
 [25] appearance issue?

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[1] A That is correct.  
 [2] Q All right. And, roughly, how many times can you  
 [3] remember Ms. Liebermann, or somebody else in her position, --  
 [4] doing that during your tenure as Chief of Staff?  
 [5] A It -- I mean, it wasn't that many times. I -- I  
 [6] certainly don't think it was, you know, more than eight or  
 [7] ten times. But, you know, just exactly what the number was  
 [8] it is difficult for me to recall.  
 [9] Q And again, by definition -- since we are talking  
 [10] about the appearance issue that you have identified -- these  
 [11] would all be involving women; is that correct?  
 [12] A That is correct.  
 [13] Q Now, taking it back a little more specifically --  
 [14] A Let me -- I don't want to -- there were many  
 [15] instances where we did not -- staff wanted to go on Air Force  
 [16] One, or staff wanted to be at a certain place, where we would  
 [17] say, you know, "Look, that person has no business being  
 [18] there, doesn't have a responsibility." And that could be  
 [19] either male or female.  
 [20] Q Right. But I was confining it just to what --  
 [21] A With regards to --  
 [22] Q -- you have identified --  
 [23] A -- these --  
 [24] Q -- as the appearance problem.  
 [25] A The appearance issue, yes. As I said, it was --

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[1] it is difficult for me to pin a number, but it was -- you  
 [2] know -- it was a few times, and I don't think it was more  
 [3] than ten.  
 [4] Q Okay. Now, going back more specifically to the --  
 [5] the issue of people who worked in the White House, or worked  
 [6] in the -- I've called it the OEGB; is that correct? The Old  
 [7] Executive Office Building?  
 [8] A Right, that is correct.  
 [9] Q The -- is that the building that used to be the War  
 [10] Department?  
 [11] A That is correct. Still --  
 [12] Q Years ago?  
 [13] A It is the old building located, I guess, to the  
 [14] west of the West Wing.  
 [15] Q Okay. Let's confine it right now -- let's forget  
 [16] about OEGB for a second -- after I've had you tell us what it  
 [17] is -- and just talk about the White House.  
 [18] And I know you have already said there is no other  
 [19] instance you remember about somebody hanging around or  
 [20] gawking, but is there any other instance where Ms.  
 [21] Liebermann, or anybody else, came to you -- anybody else came  
 [22] to you and said, "We've got this appearance problem with x-  
 [23] person, and we need to do something about it." Along those  
 [24] lines.  
 [25] Again, just on the issue of employees or people --

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(1) you know, employees in the White House on a regular basis.  
 (2) Not an event, not something related to an event, as opposed  
 (3) to somebody who was regularly in the White House.  
 (4) Is that clear?  
 (5) A Yeah.  
 (6) Q Okay.  
 (7) A I believe so.  
 (8) Q Any other occasions you recall?  
 (9) A Well, I mean I recall Evelyn would express concern  
 (10) about [REDACTED].  
 (11) Q Okay.  
 (12) A And that is the only other name that, frankly,  
 (13) comes to mind.  
 (14) Q Okay. And who is [REDACTED]?  
 (15) A She was one of the [REDACTED].  
 (16) Q And do you know what particular -- while you were  
 (17) Chief of Staff, do you recall what her particular title was?  
 (18) A No, she -- she moved around in terms of her  
 (19) responsibilities. I think she was at one point kind of the  
 (20) principal liaison to the gay community.  
 (21) Q Okay.  
 (22) A And beyond that, I think she worked in the  
 (23) Democratic Convention, Harold Ickes. But beyond that I don't  
 (24) recall all of her specific assignments.  
 (25) Q And she is an old friend of the President; is that

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(1) personnel action there could be repercussions for that.  
 (2) Q I don't mean to be highly technical, but you said  
 (3) taking action like that, do you mean any time you transfer  
 (4) anybody, or action like she took in the -- specifically in  
 (5) the appearance type of situation, the Monica type situation?  
 (6) A No, it was more than that. I mean, any time -- any  
 (7) time Evelyn acted, you know, with regards to disciplining an  
 (8) employee she usually informed me of it, to make sure that I  
 (9) would -- you know, I was aware of it and, obviously, I would  
 (10) support her.  
 (11) Q There have been reports in the -- let me  
 (12) strike that. The -- was there any -- after this decision was  
 (13) made -- well, after this conversation was had with Ms.  
 (14) Liebermann, you assumed that she would simply take care of  
 (15) the problem?  
 (16) A That is right.  
 (17) Q Did she tell you exactly what she wanted to do?  
 (18) A No.  
 (19) Q Did she indicate whether she would fire or transfer  
 (20) the employee?  
 (21) A I don't recall. She just basically said, "I'm  
 (22) moving her out."  
 (23) Q All right. We are talking about Monica Lewinsky?  
 (24) Uh-huh.  
 (25) Q Is that right?

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(1) correct?  
 (2) A That is my understanding.  
 (3) Q Going back many years?  
 (4) A That is correct.  
 (5) Q Okay. Did you speak to -- well, what did you do  
 (6) after Ms. Liebermann brought this to your attention?  
 (7)  
 (8) A It -- we would just take precautions --  
 (9) Q Well, I am now talking about the particular  
 (10) instance of Ms. Lewinsky.  
 (11) A Oh, I'm sorry. She -- she told me that she wanted  
 (12) to move her out, as a result of her concerns about her  
 (13) hanging around, and I said, "Fine."  
 (14) Q Okay. Did you -- did you tell her -- give her any  
 (15) more detail than that, or did you just give your okay?  
 (16) A No. I gave her my okay. I mean, I -- again to put  
 (17) this in context, I'm not spending all my time, you know,  
 (18) working on interns, or -- you know -- even that matter I  
 (19) think -- as I recall this, I was kind of rushing out of from  
 (20) one place to another, Evelyn came up to me, quickly told me  
 (21) this and I said, "Fine." And I went on to deal with, you  
 (22) know, the myriad of other issues that I was dealing with.  
 (23) Q Did she tell you that anybody had spoken to her?  
 (24) A No.  
 (25) Q About Ms. Lewinsky?

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(1) A Yeah.  
 (2) Q Did you -- after she was moved out, what did --  
 (3) what, if any, fallout occurred?  
 (4) A I don't recall any fallout.  
 (5) Q Okay. Did anybody ever ask you, "Why has Monica  
 (6) been moved?"  
 (7) A No.  
 (8) Q After Ms. Liebermann had brought this to your  
 (9) attention, did you discuss it at all with the President?  
 (10) A I did not.  
 (11) Q Did the President ever ask you, directly or  
 (12) indirectly, "Why has Monica Lewinsky been moved?"  
 (13) A No, not that I recall.  
 (14) Q Did the President, after she was moved, and -- are  
 (15) you aware where she was moved?  
 (16) A No, I wasn't.  
 (17) Q Okay. So you wouldn't be aware that she -- before  
 (18) she went to the Pentagon she might have gone to work for  
 (19) Patsy Thomasson, in the OEOB?  
 (20) A I -- I'm not aware of that.  
 (21) Q Okay. Did Ms. Liebermann say anything about  
 (22) denying her access, denying Monica Lewinsky access after she  
 (23) was moved, access to -- let's just say the first floor of the  
 (24) West Wing?  
 (25) A I don't remember that. You know, that she said

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(1) A No.  
 (2) Q Did anybody else, other than Evelyn, around this  
 (3) time speak to you about Ms. Lewinsky?  
 (4) A Not that I recall.  
 (5) Q Had anyone spoken to you before Evelyn came up and  
 (6) identified this problem, speak to you about Ms. Lewinsky?  
 (7) A Not that I recall.  
 (8) Q Why would -- why would Evelyn go to you in an  
 (9) instance like this? Why would -- why would Evelyn Liebermann  
 (10) come and tell you about Monica Lewinsky?  
 (11) A I -- Evelyn was very good about reporting to me on  
 (12) any actions that she took, or concerns, if the Secret Service  
 (13) expressed a concern on a particular situation, or there was a  
 (14) security issue, or there was something related to, again,  
 (15) either personnel or scheduling, Evelyn was very good about  
 (16) coming into my office and telling me about those things.  
 (17) So it -- it was -- I think it was her standard  
 (18) procedure to make sure that, you know, I was aware of the  
 (19) action she was taking.  
 (20) Q Would she tell you about any employee working in  
 (21) the White House who would be transferred or fired?  
 (22) A Yeah, she -- I mean, she would -- if she was taking  
 (23) action like that I think, as a good Deputy, she knew it was  
 (24) her responsibility to let me know that personnel, you know,  
 (25) may be moved. Because, in the end, any time you take

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(1) specifically, "I'm going to do that." Because, you know,  
 (2) when Evelyn says, "I'm going to move somebody out," I  
 (3) generally trusted that she would take that action, and that  
 (4) she would take appropriate measures to make sure that that  
 (5) didn't happen again.  
 (6) Q That being the appearance problem?  
 (7) A That is right.  
 (8) Q And -- but do you -- I asked the question kind of  
 (9) specifically about access to the West Wing, would that --  
 (10) A She did not --  
 (11) Q -- also mean she didn't ask -- she didn't  
 (12) specifically say anything about access to any part of the  
 (13) White House?  
 (14) A I don't recall her speaking as to what particular  
 (15) step she was going to take.  
 (16) Q And knowing Evelyn Liebermann, and knowing what you  
 (17) expected of her, and what she expected of you, are you saying  
 (18) that you would have expected her to make sure that this  
 (19) person simply wouldn't find her way back into the White  
 (20) House?  
 (21) A That is right.  
 (22) Q You mentioned that you could go from a -- it could  
 (23) happen that an intern could go straight from the internship  
 (24) into a White House staff job if they had -- were  
 (25) extraordinarily responsible and had done a good job. Do you

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(1) recall that?  
 (2) A Yes.  
 (3) Q Do you have any idea how good of a job Monica  
 (4) Lewinsky was considered to have done when she was an intern?  
 (5) A Not really. I mean I -- she -- she did a pretty  
 (6) good job, as I recall, you know, handling the phones. It is  
 (7) not -- it wasn't easy particularly during the shutdown  
 (8) because we had a large number of calls coming in. So she --  
 (9) she did that, you know, with, I think, pretty good  
 (10) capability.  
 (11) But beyond that, I just -- I did not follow the  
 (12) interns that closely to -- you know -- to really view their  
 (13) capabilities.  
 (14) Q Nothing that you recall as being standout about her  
 (15) intern performance?  
 (16) A That is correct.  
 (17) Q If she had been caught gawking when she was an  
 (18) intern, would you have allowed her to have a staff job in  
 (19) OLA?  
 (20) A No.  
 (21) Q What do you know about Joc -- a lady known as  
 (22) Jocelyn Jolley? Does that ring a bell?  
 (23) A No, it doesn't.  
 (24) Q Do you know whether or not she might have been the  
 (25) supervisor of Ms. Lewinsky in the Office of Legislative

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(1) Affairs?  
 (2) A I do not know that.  
 (3) Q Do you know anything about any other individual  
 (4) being transferred out at the same time that Monica Lewinsky  
 (5) was?  
 (6) A Not that I recall.  
 (7) Q Do you recall anybody being disciplined in any way  
 (8) because of not having controlled Ms. Lewinsky?  
 (9) A No, I don't.  
 (10) Q You have heard about the -- have you heard some of  
 (11) the reports that have been going out in the media in the last  
 (12) few days, about an incident in a movie theater?  
 (13) A I have heard those reports.  
 (14) Q In fact, there have been, I believe, denials issued  
 (15) at least on your behalf, and Ms. Liebermann's behalf, by the  
 (16) White House; is that correct?  
 (17) A That is correct. We were -- we were asked if that  
 (18) was true, and we indicated that was not true.  
 (19) Q And, I believe the stories are that -- I think  
 (20) there are many versions of the story by now, but I think the  
 (21) story is that some kind of an Aide, somewhere, or Secret  
 (22) Service Agent or Aide, saw the President and Ms. Lewinsky  
 (23) engaged in intimate behavior, or intimate sexual behavior,  
 (24) and that somehow it got reported to you and/or Ms.  
 (25) Liebermann.

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(1) Is that more or less how you heard it?  
 (2) A That is what I have heard.  
 (3) Q Okay.  
 (4) A In terms of the rumor.  
 (5) Q And as it applies to you, is it -- is that true in  
 (6) any way, shape, or form?  
 (7) A That is not true. I can assure you if -- if an  
 (8) agent had told me, or I had been informed of an instance like  
 (9) that, that I would not remember it but I would take it  
 (10) up with the President.  
 (11) Q Okay. And you didn't -- you didn't -- is it safe  
 (12) to say until you heard the rumor over the last few days you  
 (13) never heard a rumor to such effect?  
 (14) A That is correct.  
 (15) Q You didn't hear it firsthand, secondhand, third  
 (16) hand, eighteenth hand --  
 (17) A No.  
 (18) Q -- is that correct?  
 (19) A No.  
 (20) Q No, it is correct that you didn't hear it?  
 (21) A No, it is correct that I did not hear that.  
 (22) Q All right. The incident -- the only incident you  
 (23) recall with respect to Monica Lewinsky is Evelyn Liebermann  
 (24) coming to you on this appearance problem, this gawking  
 (25) problem?

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(1) A That is --  
 (2) Q Is that correct?  
 (3) A -- correct.  
 (4) Q Okay. Would you give us your interpretation of the  
 (5) word gawking.  
 (6) A I think just, you know, kind of standing around  
 (7) and, you know, in a way looking around, trying to, you know,  
 (8) catch somebody's eye.  
 (9) Q Trying to catch somebody's eye?  
 (10) A That is right. There has got to be a dictionary  
 (11) definition -- (laughter).  
 (12) Q And -- pardon me just a minute.  
 (13) A Sure.  
 (14) (Brief pause.)  
 (15) Q Let's go back for just a second and talk about you  
 (16) said that you first met Ms. Lewinsky during the January 1996  
 (17) government shutdown; is that correct?  
 (18) A That was -- that was my first recollection of --  
 (19) you know -- it is my only recollection of her.  
 (20) Q That is your only recollection of her?  
 (21) A Yeah. I mean, was --  
 (22) Q Okay.  
 (23) A -- when she -- when she worked there in the office.  
 (24) As I said, I think I did see her periodically, if I was  
 (25) walking, you know, in the corridors, I might see her. But, I

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(1) -- I -- it was not that often. But that was my only --  
 (2) Q Okay. And I believe you said --  
 (3) A -- recollection --  
 (4) Q -- you saw her -- recollection? You said that  
 (5) was --  
 (6) A Yeah, that was --  
 (7) Q -- your recollection?  
 (8) A -- my only recollection.  
 (9) Q I cut you off, your last part of --  
 (10) A I'm sorry.  
 (11) Q So -- and I believe you testified you saw her, she  
 (12) was there for a period of a couple of days during the  
 (13) shutdown, manning phones; is that correct?  
 (14) A That's right.  
 (15) Q And that would have been in Reception Area 2, on  
 (16) our map?  
 (17) A That is correct. There are a number of desks in  
 (18) Reception Area 2. I don't want to -- if I start drawing them  
 (19) there won't be anything left of the Reception Area 2. But  
 (20) just right outside the door into Room 111 there is a desk  
 (21) there that normally is the individual who answers phone, and  
 (22) that would have been at the approximate location where she  
 (23) was located.  
 (24) Q Did you know anything about a -- strike that.  
 (25) After this occasion, you said you saw her between

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(1) the time that -- let's -- let's try to get the time frame.  
 (2) You said you saw her a few more times after the budget  
 (3) shutdown period, in the corridors, as you were walking  
 (4) through the --  
 (5) A That is right.  
 (6) Q -- walkways, and hallways; is that correct?  
 (7) A That is correct.  
 (8) Q Now that would be generally in this West Wing area  
 (9) we were talking about today?  
 (10) A Yes. I -- I do believe there was one time when I  
 (11) was walking in the basement of the private residence where  
 (12) she was walking through that area.  
 (13) Q Okay. And what is the basement of the private  
 (14) residence?  
 (15) A I call it the basement. I mean it's -- you know,  
 (16) it's -- it's the lowest -- it's the lower level of the  
 (17) private residence. It is usually the hallway that leads you  
 (18) to the East Wing.  
 (19) Q Okay. And it is at the same level as the basement  
 (20) underneath the West Wing?  
 (21) A I think that's right, it is ground level.  
 (22) Q Okay. And --  
 (23) A From --  
 (24) Q -- you know, you have identified the basement of  
 (25) the West Wing as having the Mess, the Situation Room, and

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[1] some offices --  
 [2] A Yeah.  
 [3] Q -- correct?  
 [4] A Yeah, it is all -- actually, it would be probably  
 [5] more in line with the first floor here (indicating), because  
 [6] this is at ground level, as I recall. Yeah, it is, it is at  
 [7] ground level.  
 [8] Q The first floor is?  
 [9] A That is correct.  
 [10] Q Okay.  
 [11] A This first floor is at ground level. And, I  
 [12] mean -- you know, you -- if you walk out the north side  
 [13] (indicating) you go to the lawn area, if you walk out this  
 [14] side you are in a lawn area, as well.  
 [15] That area in the White House is at ground level  
 [16] too. If you walk out the door, as you walk out into the  
 [17] South lawn.  
 [18] Q The -- this area where you saw Ms. Lewinsky?  
 [19] A That was the corridor in the -- in the residence.  
 [20] And, as I said, it is usually an area where people walk from  
 [21] the East Wing to the West Wing.  
 [22] Q Do you walk from there directly into the residence  
 [23] area?  
 [24] A Yes.  
 [25] Q All right. Do you recall what time of day --

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[1] A No.  
 [2] Q -- you saw her?  
 [3] A No. No, I think I was -- I was rushing around, as  
 [4] I normally used to do. I was either, you know, moving --  
 [5] going to an event or going to a briefing. But I was -- I was  
 [6] rushing somewhere.  
 [7] Q How unusual would that be, to see a staffer, Office  
 [8] of Legislative Affairs staffer heading towards the --  
 [9] particularly a low level staffer, heading towards the  
 [10] residence area?  
 [11] A I -- I have to tell you, it isn't that unusual,  
 [12] because that is an area where a lot of staff will transit,  
 [13] particularly between the East Wing and the West Wing. And,  
 [14] you know, the staff that may be working in that area. So it  
 [15] isn't -- it isn't that unusual.  
 [16] Q Did you find it -- well, you remember it today, did  
 [17] you find it unusual in any way at the time, or did you think  
 [18] about it, or --  
 [19] A Well, if she was working -- I mean, if she was  
 [20] working in the Legislative office and was transitioning for  
 [21] some reason that would not have been that unusual. I just  
 [22] happened to recall it now, because, you know, it came back to  
 [23] me.  
 [24] Q Is it one of those things that when a later event  
 [25] happens that later event causes you to recall earlier events?

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[1] A It certainly does.  
 [2] (Laughter.)  
 [3] Q And --  
 [4] A It certainly does.  
 [5] Q Are there any other like that, that you -- any  
 [6] other events you have recalled? You have talked about the --  
 [7] you said you saw her a few times in the corridor, as you have  
 [8] mentioned, earlier than that, when you saw her manning the  
 [9] phones, any other -- any other instances, specific instances  
 [10] that come to mind?  
 [11] A No. That -- that really --  
 [12] Q Okay.  
 [13] A -- is the most I can remember.  
 [14] Q How many times, without -- without reference to  
 [15] remembering a specific incident, how many times that you  
 [16] recall you -- do you recall bumping into her, seeing her?  
 [17] A Oh, it can't be more than two or three times.  
 [18] Q Okay. That is in addition to her manning of the  
 [19] phones?  
 [20] A That is correct.  
 [21] Q And to the incident on the way to the residence?  
 [22] A That is correct.  
 [23] Q Okay. So if you add two or three to those two,  
 [24] maybe four or five times?  
 [25] A I think that is -- that would be fair. As best as

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[1] I can recollect it.  
 [2] Q Did you ever see her in the White House after Ms.  
 [3] Liebermann told you she was moving her out, that is moving  
 [4] Monica Lewinsky out?  
 [5] A No.  
 [6] Q If you had found out that she was a regular visitor  
 [7] to the West Wing area -- let me strike that.  
 [8] If you found -- if you had found out that she was a  
 [9] regular visitor to the White House, and that somebody was  
 [10] letting her in after this time period -- and when I say  
 [11] regular, let's say fifteen to twenty times -- if you had  
 [12] found out after this incident with Ms. Liebermann, that Ms.  
 [13] Lewinsky had, in fact, been let into the White House fifteen  
 [14] to twenty times, and you were still Chief of Staff, would you  
 [15] have -- what would you have done about that?  
 [16] A I would have gone to Evelyn Liebermann and asked  
 [17] her what is going on, why is this happening. Because it  
 [18] would have been the very problem that she was concerned  
 [19] about.  
 [20] Q The appearance problem?  
 [21] A That is correct.  
 [22] Q Would you have found this troubling, alarming?  
 [23] A It would have been troubling, in the sense that, I  
 [24] mean, the very reason that action was taken against her that  
 [25] would have been violated.

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[1] Q The -- it makes no sense in terms of transferring  
 [2] her out; is that a fair statement?  
 [3] A Yeah. I mean the whole -- the whole purpose of  
 [4] getting her out was to insure that she would not just be  
 [5] standing around, and visiting in that part of the White  
 [6] House.  
 [7] Q And I take it your -- again, you didn't have any --  
 [8] nothing that Ms. Liebermann told you gave you any kind of  
 [9] security -- she didn't say this person is a security threat  
 [10] to the President; is that correct?  
 [11] A No.  
 [12] Q And I take it your concern would be even greater if  
 [13] you found out that on these fifteen to twenty occasions the  
 [14] person was going to the West Wing, to the West Wing of the  
 [15] White House, in the Oval -- the general Oval Office area?  
 [16] A That -- that would have concerned me, based on the  
 [17] conversation that I had with Evelyn.  
 [18] MR. WISENBERG: I'm not the original author of all  
 [19] my questions.  
 [20] (Laughter.)  
 [21] FOREPERSON: I have a question.  
 [22] MR. WISENBERG: Yes, ma'am.  
 [23] FOREPERSON: While you are looking for your  
 [24] question.  
 [25] I want to get something clear in my mind again. To

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[1] the Oval Office complex are the presidential dining room,  
 [2] that door that leads from Walkway No. 1, you said that has a  
 [3] security closure to it.  
 [4] THE WITNESS: Yes.  
 [5] FOREPERSON: Now, does it have a combination to it,  
 [6] or you have to have an actual physical key?  
 [7] THE WITNESS: [REDACTED]  
 [8] [REDACTED]  
 [9] FOREPERSON: Okay. Now, one of my other questions  
 [10] for you is normally when you would leave your office, Room  
 [11] 111, which route would you take to go and see the President?  
 [12] THE WITNESS: The most direct route I would take is  
 [13] to -- I would come out my door, go out the Reception Area No.  
 [14] 2, walk down Walkway 1, through Walkway 2, into the Reception  
 [15] Area, and then into the Oval Office.  
 [16] FOREPERSON: Would there ever be a time, say, for  
 [17] instance if you were maybe doing some -- some very serious  
 [18] negotiations and say you left something in your office,  
 [19] and you would maybe take a shortcut through the Oval Office  
 [20] com -- through the Oval Office complex, through that hallway  
 [21] and back into the Oval Office?  
 [22] THE WITNESS: I'm sorry. You are talking about off  
 [23] Walkway 1?  
 [24] FOREPERSON: Yes. To take a shortcut that way, so

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[1] you could --  
 [2] THE WITNESS: No, no.  
 [3] FOREPERSON: -- bring papers back --  
 [4] THE WITNESS: No, no, no, because I -- I really --  
 [5] I considered that to be the private quarters of the President  
 [6] of the United States, and I was not going to go barging in  
 [7] there. I would go around through the other end.  
 [8] FOREPERSON: Okay. Thank you. That is all.  
 [9] BY MR. WISENBERG:  
 [10] Q You didn't want -- you didn't want anybody  
 [11] basically -- would it be fair to say you didn't want anybody  
 [12] having access to the Oval Office through the Oval Office  
 [13] complex, which includes the dining room, through that  
 [14] hallway, unless the President was literally inviting them in?  
 [15] A That is correct. The only -- I did not want  
 [16] anybody thinking that they could walk through these other  
 [17] doors. That is why I told George Stephanopoulos never to use  
 [18] that door. That is why, you know, we -- we would control  
 [19] access into the dining room.  
 [20] And what I wanted was all of the traffic that was  
 [21] to go into the Oval Office would go through the Reception  
 [22] Area, so that you could control who was going in to see the  
 [23] President.  
 [24] The only exception to that was if we were briefing,  
 [25] instead of the Oval Office we were briefing in the dining

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[1] room then we would use that access off of Walkway 2, to bring  
 [2] people into the dining room. But that was -- that was  
 [3] cleared by me.  
 [4] Q Did you ever hear any rumor -- any rumor of any  
 [5] kind before this -- this event broke a few days ago, any  
 [6] rumor of any kind about the President and Monica Lewinsky  
 [7] being involved in a relationship?  
 [8] A No, I have not.  
 [9] Q You said that if you had -- in response to some of  
 [10] our questions, some of my questions -- including one recent  
 [11] one about what would you have done if you had found out the  
 [12] person had -- had been allowed in fifteen to twenty times to  
 [13] the West Wing -- you would have discussed it with the  
 [14] President.  
 [15] Do you recall answering that --  
 [16] A No, I'm sorry. If that -- what that was referring  
 [17] to was if someone had seen the President in the theater --  
 [18] Q Oh, the --  
 [19] A -- in some kind of --  
 [20] Q -- theater incident. Okay.  
 [21] A -- in some kind of compromising situation, and had  
 [22] informed me of that I would certainly not only remember that  
 [23] I would have gone to the President and said --  
 [24] Q That's right, I stand corrected. As a matter of  
 [25] fact, I think your answer was to the -- to the question about

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[1] fifteen to twenty times you would have gone to Ms. Liebermann  
 [2] and said, "What's going on?"  
 [3] A That is right.  
 [4] Q Okay. As an initial step?  
 [5] A That's right.  
 [6] Q And, I take it if she had said something to the  
 [7] effect of, "The President wants it that way," you then would  
 [8] have spoken to the President?  
 [9] A That is correct.  
 [10] Q The -- did you -- getting back to the rumor  
 [11] incident, the movie -- movie theater rumor that we have been  
 [12] hearing about in the press, did you ever have any -- any --  
 [13] other than -- let me see if I can ask this in a halfway  
 [14] literate way.  
 [15] How many times did you have that type of discussion  
 [16] with the President, about the appearance issue? I mean, you  
 [17] have mentioned -- let me just ask you that way. How many  
 [18] times did you have the appearance type discussion with the  
 [19] President, related on -- related to an incident you heard  
 [20] about or saw?  
 [21] As opposed to you earlier talked about somebody  
 [22] going on a trip and you don't want them on. Let's just talk  
 [23] about the issue of based on any incident you saw or heard  
 [24] about, or any rumor you heard about, how many discussions  
 [25] with the President?

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[1] A Normally, that discussion usually involves  
 [2] scheduling. You know, we knew he was going to a particular  
 [3] place, and wanted to take precautions, again regarding the  
 [4] appearance, and we would raise those issues with him.  
 [5] As to other situations, I mean if someone, for  
 [6] example, wanted to see him and Nancy Hemreich alerted me, I  
 [7] might then intercede with the President, say, "You know, I  
 [8] don't think that ought to take place." Or, you know,  
 [9] indicate that -- you know -- that, "It would be better if you  
 [10] -- you know, if you kind of went --" you know, "went to a  
 [11] different area to greet them."  
 [12] Q I was referring though to a -- an historical event,  
 [13] meaning an event that happened before you would have -- prior  
 [14] to discussing it with the President. How -- how often, if  
 [15] ever, was there an event that you saw, heard about, heard a  
 [16] rumor about, a particular historical event, even if it was  
 [17] one day prior, that caused you to have one of these  
 [18] appearance discussions with the President?  
 [19] A Not -- not that many times. I mean, it is  
 [20] really -- there were very few times when, you know, I  
 [21] might -- I might have indicated a concern about something  
 [22] that had happened at an event, or at an occasion, or  
 [23] something like that, and I might just express, you know, a  
 [24] concern then.  
 [25] But it wasn't that much. It really wasn't.

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[1] Q About how many times would that happen?  
 [2] A I don't know, maybe a couple of times. Two or  
 [3] three times. Not that much.  
 [4] Q All right. Any particular incidents that stand out  
 [5] in your mind among those two or three?  
 [6] A No. I mean if -- if I had heard, for example on a  
 [7] trip, that he had, you know, gone in a car with somebody and,  
 [8] you know, while it was -- it was perfectly innocent it  
 [9] created a certain impression, then I might raise it with him.  
 [10] And that would be the kind of thing I might raise with him.  
 [11] Q Again, I want -- I just want to make sure -- I know  
 [12] it is a sensitive question, do I understand you to say there  
 [13] were two or three occasions, to the best of your memory,  
 [14] where you approached the President after learning about an  
 [15] event, on this appearance issue?  
 [16] A Again I am -- as best as I can recall, I think that  
 [17] -- that would have been the case. It wasn't -- you know, it  
 [18] wasn't that much. On the other hand, if something was  
 [19] brought to me that would concern me I would usually raise it  
 [20] with the President.  
 [21] Or if I -- he and I had a pretty straightforward  
 [22] relationship, and I never hesitated to raise those kinds of  
 [23] issues with him, if I thought they were -- they were a  
 [24] concern.  
 [25] Q As a general matter?

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[1] A (No response.)  
 [2] Q As a general matter, you mean?  
 [3] A Yes.  
 [4] Q Any concern you had?  
 [5] A That's right.  
 [6] Q On the two or three occasions that you remember, do  
 [7] you remember anything notable about the President's response,  
 [8] when you brought it to him?  
 [9] A He -- he generally would be very -- I mean, he  
 [10] would say, "You're right. You know, it shouldn't have  
 [11] happened." Or, I mean he -- he never resisted the -- you  
 [12] know, if I made that criticism, he would always be receptive  
 [13] to it.  
 [14] Q He never said the equivalent of "Back off?"  
 [15] A No. He never said, "Back off, it's none of your  
 [16] business." Or, blah, blah, blah. He always said, "You are  
 [17] right." Or, you know, "Just we have to be --," you know, he  
 [18] shouldn't do that, that kind of thing.  
 [19] Q What were -- to the best of your recollection -- to  
 [20] the best of your recollection, the best of your specific  
 [21] recollection, tell us about these two or three times.  
 [22] A (Chuckling.) That -- it is very difficult to -- I  
 [23] mean, to remember the specifics. It really is. I mean, I  
 [24] think, you know, there may have been one time when I think he  
 [25] may have ridden in a car with [REDACTED] and we just

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[1] were concerned about the appearance of that.  
 [2] And the only other thing that we took -- we wanted  
 [3] to make sure that he did not stay at the Lawrence house, in  
 [4] San Diego. To make sure that that would not happen, and it  
 [5] didn't happen.  
 [6] Q And that was based on some -- was that based on any  
 [7] rumor you have heard?  
 [8] A It wasn't based on a rumor, it was just that the  
 [9] President of the United States, we felt, ought not to be  
 [10] staying at -- at, you know, a woman's house. I believe this  
 [11] was after the death of her husband.  
 [12] Q Okay. Now that was an -- that would be one of  
 [13] those future scheduling incidences?  
 [14] A That's right.  
 [15] Q The [REDACTED] incident would have been after  
 [16] it happened?  
 [17] A I believe that was the case.  
 [18] Q Do you recall any other [REDACTED] incidences  
 [19] after the fact, like that?  
 [20] A No.  
 [21] Q Any other memories? Again, I'm trying to confine  
 [22] myself to the occasions where you would have talked -- talked  
 [23] to the President after something happened. Anything other --  
 [24] specific memories of events or people, other than the [REDACTED]  
 [25] [REDACTED]?

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[1] A I -- it is difficult for me to recall, you know,  
 [2] what the specifics of that would have been. But that's --  
 [3] those are the -- those are the only ones that come to mind.  
 [4] But I know, you know, there are others but I can't tell you  
 [5] what exactly the situation was.  
 [6] Q Okay. Did the -- who -- how did you find out about  
 [7] -- do you recall who would come to you on -- again on these  
 [8] two or three instances, how you would find out, the past  
 [9] incidences? Do you recall who would have told you?  
 [10] A Oh, it could have been, you know, any -- any Aide,  
 [11] or -- normally it -- it might well have been the Deputy who  
 [12] was on a particular trip.  
 [13] Q Okay. Did the First Lady ever speak to you,  
 [14] directly or indirectly, about any of these past incidences?  
 [15] A No.  
 [16] Q About any of these scheduling type incidences?  
 [17] A No.  
 [18] Q Do you know if Monica Lewinsky got any special  
 [19] treatment when she was an intern? That is to say, was she  
 [20] treated better than the other interns?  
 [21] A Not that I'm aware.  
 [22] Q Same question for when she was a staffer. The --  
 [23] an OLA staffer, aware of any special treatment that she got?  
 [24] A I'm not aware of any special treatment.  
 [25] Q I guess one possible exception to those two

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[1] previous answers would be the transfer from internship to  
 [2] OLA, in the sense that I believe you have told us that would  
 [3] typically be for a -- that was not typical, and if it was  
 [4] done it would be for a standout job; is that correct?  
 [5] A I -- I think that is correct.  
 [6] THE WITNESS: Is this indicative of something?  
 [7] (Laughter.)  
 [8] MR. WISENBERG: Pardon me just a minute. We have  
 [9] kind of jumped out of my order, and so I'm able to -- I'm  
 [10] sure to everybody's relief I'm going to be able to skip a lot  
 [11] of questions.  
 [12] (Brief pause.)  
 [13] Q What do you know -- what do you know about Linda  
 [14] Tripp? Did you know a woman by the name of Linda Tripp?  
 [15] A I am not familiar with Linda Tripp.  
 [16] Q You have heard about her in the last week or so?  
 [17] A Obviously, I have heard about her in the news. But  
 [18] -- I tried to see if I, you know, even remembered her, and  
 [19] I do not remember her.  
 [20] Q Office of Legislative Affairs, is that an office  
 [21] that typically you would have had a real interest in, in the  
 [22] sense of the day-to-day interest in?  
 [23] A I'm not quite sure how Legislative Affairs is  
 [24] broken down between the East Wing office and the West Wing  
 [25] office. The East Wing office may very well be involved with

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[1] the First Lady's affairs.  
 [2] I mean I'm just not sure what the role of that  
 [3] office is. I was very active with the West Wing office,  
 [4] because that was kind of our primary legislative arm, in  
 [5] dealing with Capitol Hill. So I would -- I would spend a  
 [6] great deal of time with the assistant responsible for  
 [7] Legislative Affairs.  
 [8] Q And in the West Wing?  
 [9] A That is correct.  
 [10] Q One, and who was that?  
 [11] A Well, there were two when I was there. One was  
 [12] Howard --  
 [13] Q Pastor?  
 [14] A -- Pastor. Well, Howard Pastor was there --  
 [15] actually, I think he had left by the time I became Chief of  
 [16] Staff. But I had dealt with him as Director of OMB.  
 [17] Then came Pat Griffin, and Pat Griffin worked me  
 [18] both as when I was Director of OMB as well as Chief of Staff.  
 [19] And then John Hilley.  
 [20] Q All right. Do you know -- do you recall when  
 [21] Hilley took over from Griffin, roughly?  
 [22] A I believe it would have been some time in early  
 [23] '96.  
 [24] Q The -- right around the time of the shutdown,  
 [25] roughly?

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[1] A Yeah. It -- it may have been -- I -- approximately  
 [2] in that area.  
 [3] Q The other day there were some news reports quoting  
 [4] you, right after this incident became public -- and maybe I  
 [5] just better -- rather than paraphrase take one out.  
 [6] MR. WISENBERG: I tell you what, we are not at  
 [7] break time, are we?  
 [8] FOREPERSON: If you say.  
 [9] MR. WISENBERG: Is there -- how long has it been  
 [10] since we broke?  
 [11] A JUROR: An hour.  
 [12] FOREPERSON: An hour. It's break time.  
 [13] MR. WISENBERG: Can we -- let's break. All right,  
 [14] let's take a break.  
 [15] (Brief recess.)  
 [16] FOREPERSON: We have a quorum.  
 [17] (Witness recalled.)  
 [18] MR. WISENBERG: Let the record reflect that we have  
 [19] a quorum.  
 [20] FOREPERSON: Mr. Panetta, you are still under oath.  
 [21] THE WITNESS: I understand.  
 [22] MR. WISENBERG: The witness has been reminded that  
 [23] he is still under oath.  
 [24] BY MR. WISENBERG:  
 [25] Q You are the same Leon Panetta that has been here

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[1] testifying all day?  
 [2] A Yes, I am.  
 [3] Q And it is conceivable that some of these final  
 [4] questions you might have been asked before. Maybe several  
 [5] hours ago.  
 [6] (Laughter.)  
 [7] Q The -- so let me ask you as quickly as I know how,  
 [8] do you ever recall seeing Monica Lewinsky with the President,  
 [9] during the time that you were Chief of Staff? Whether alone  
 [10] or with other people?  
 [11] A I do not.  
 [12] Q The area that you have identified as the -- on the  
 [13] map, Reception Area 1, let's go over it. I want to be  
 [14] specific here.  
 [15] Reception Area 1, including Nancy Hemreich's  
 [16] office, the Oval Office, the Walkway No. 2, Study, Hall 1  
 [17] Oval Office complex, that whole -- that's my whole area I'm  
 [18] talking about here now.  
 [19] Are you with me?  
 [20] A Yes.  
 [21] Q Including the portion of Walkway No. 1, that would  
 [22] be opened out into by those -- those areas. Do you  
 [23] understand what I'm saying?  
 [24] A Yes.  
 [25] Q Do you ever recall seeing -- you said you never

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[1] recall seeing Monica Lewinsky with the President, did you  
 [2] ever see, to your recollection, Monica Lewinsky in any of  
 [3] those areas?  
 [4] A I -- I don't remember her -- seeing her in any of  
 [5] those walkway areas.  
 [6] Q Okay. Do you remember a specific room, other -- or  
 [7] hallway, other than what you testified to, where you would  
 [8] have seen her? Other than what you have already testified  
 [9] to.  
 [10] A There, and it's possible in Walkway 3, that -- that  
 [11] might have been in another place where I might have run into  
 [12] her, or perhaps in the -- in what I call the Basement of  
 [13] the -- of the White House. That -- that is possible, as  
 [14] well.  
 [15] Q Now is that different from the other basement  
 [16] incident you have talked about, the --  
 [17] A Yes. That -- that would be in the basement here  
 [18] (indicating) of the West Wing.  
 [19] Q All right. Where you have said the Mess -- the  
 [20] Mess is and some --  
 [21] A Here is the Mess (indicating), that's right.  
 [22] Q -- other things? Okay.  
 [23] Let me ask you to help us resolve something. Where  
 [24] -- you have talked about the Secret Service person posted at  
 [25] Desk No. 1.

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[1] A Yes.  
 [2] Q We have got some reason to believe that there might  
 [3] be -- well, let me just ask it this way. Is there a Secret  
 [4] Service agent, or agents posted there in this Walkway No. 2  
 [5] area?  
 [6] A Walkway No. 2?  
 [7] Q "W.K." yeah.  
 [8] A Yes. Normally there are agents that are located in  
 [9] the Walkway 2 area.  
 [10] Q Okay. Do you recall what --  
 [11] A And these are what -- you know, the -- what I would  
 [12] call the -- I mean, the President's Secret Service detail, as  
 [13] opposed to the uniform detail.  
 [14] Q Okay.  
 [15] A There is a uniform individual that was at Desk 1.  
 [16] The people in Walkway 2 were normally the Secret Service  
 [17] agents who accompany the President.  
 [18] Q The very detail that protects the President?  
 [19] A That's right.  
 [20] Q Okay. And were in -- and there would typically be  
 [21] a detail station somewhere in Walkway 2?  
 [22] A That is usually where they would be detailed.  
 [23] Q Any particular part of Walkway 2?  
 [24] A Normally in front of that door that -- that -- in  
 [25] which there is access to the Oval Office.

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[1] Q Okay. The -- were they typically posted -- and I  
 [2] mean either, you know, standing, sitting, what have you -- in  
 [3] Reception Area 1?  
 [4] A No.  
 [5] Q Nancy Hemreich's office?  
 [6] A No.  
 [7] Q The Oval Office?  
 [8] A No.  
 [9] Q Hall 1?  
 [10] A No.  
 [11] Q The Study?  
 [12] A No.  
 [13] Q The Cabinet Room, other than when there was a  
 [14] Cabinet meeting?  
 [15] A No. The only other place I recollect the presence  
 [16] of agents would have been in the colonnade area that -- what  
 [17] I have described as kind of a porch outside the Oval Office.  
 [18] Q Okay.  
 [19] A I believe there was an agent who was located in  
 [20] that area.  
 [21] Q Okay. How about the porch -- okay, the porch --  
 [22] A I call it the porch.  
 [23] Q Yeah.  
 [24] A It is that -- it is that area as you exit the Oval  
 [25] Office through the --

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[1] Q Three o'clock door?  
 [2] A That's right, through the door to the colonnade.  
 [3] Q Okay. And did I ask you about the Oval Office  
 [4] dining room?  
 [5] A No, you didn't, but there is no agent stationed  
 [6] there.  
 [7] Q How about Patio 1?  
 [8] A Not that I'm -- not that I'm aware of. I don't  
 [9] believe so.  
 [10] Q What is this thing that looks like at attache case  
 [11] handle jutting out of the Study?  
 [12] A I don't know what the hell that is.  
 [13] (Laughter.)  
 [14] A I don't remember that.  
 [15] Q Is there any kind of a bay window, or anything like  
 [16] that, or --  
 [17] A No. No, I mean there are hedges -- there are a  
 [18] number of hedges and trees in that area there, that separate  
 [19] the patio off my office from the Oval Office patio, and --  
 [20] you know, there may well be, you know -- there could very  
 [21] well be an air conditioning unit or something that is there  
 [22] above ground. But I have never paid that much attention to  
 [23] it.  
 [24] I don't know what that represents.  
 [25] Q When the President is in the Oval Office, the Oval

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[1] Office, the Study, or Hall 1, the dining room, the Secret  
 [2] Service agents are there -- they are typically still in  
 [3] Walkway 2; is that correct?  
 [4] A That is correct. And they are stationed usually in  
 [5] a position where they can look down Walkway 1, and also,  
 [6] obviously, down Walkway -- or that waiting area. They can --  
 [7] Q Okay.  
 [8] A -- catch both of those.  
 [9] Q But it is safe to say that as he really starts  
 [10] roaming around they are going to -- outside of the areas I  
 [11] have designated they are going to follow him?  
 [12] A That is correct.  
 [13] Q So when there is a Cabinet meeting they are going  
 [14] to be either in the Cabinet Room or right outside of it?  
 [15] A That is right.  
 [16] Q Do you remember which?  
 [17] A If they -- if they are in the -- if the President  
 [18] is meeting in the Cabinet Room normally they will be posted,  
 [19] you know, in the colonnade area -- you will see some in the  
 [20] colonnade area, and there may be one posted at the door  
 [21] leading to the Cabinet Room off of the Waiting Area No. 1.  
 [22] Q The -- were you surprised to hear that Vernon  
 [23] Jordan had -- and I'm talking about his public statement now,  
 [24] the other day, were you surprised to learn that Vernon Jordan  
 [25] had taken Ms. Lewinsky to her lawyer?

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[1] A Yes.  
 [2] Q Can you tell us why?  
 [3] A Okay. Because I -- I think, you know, Vernon --  
 [4] Vernon Jordan is a close friend of the President, and someone  
 [5] who is -- you know, someone that normally, you know, you  
 [6] might speak to on a particular concern that, you know, he may  
 [7] have because he is a, you know, a close friend of the  
 [8] President, also someone who, you know, generally has pretty  
 [9] good advice on policy issues.  
 [10] But -- and he is someone, you know, who generally  
 [11] helps people. But I -- you asked the question was I  
 [12] surprised that he was involved here, and it did surprise me.  
 [13] Q He is -- he is a very major player; is that a fair  
 [14] statement?  
 [15] A He is a close friend of the President, and, I mean  
 [16] I -- you know, I did not -- on a day-to-day basis I did not  
 [17] have that many dealings with Vernon Jordan. I normally, you  
 [18] know, saw him at social events.  
 [19] And during the time that we were selecting new  
 [20] Cabinet members in the transition period, between the first  
 [21] and second terms, he was very much involved in the personnel  
 [22] selection process. And those were the occasions where I saw  
 [23] him.  
 [24] So, in that regard, you know, he plays a pretty  
 [25] high level role in terms of -- about as high level as a

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1 person can play not being a member of the administration.  
 2 Q Is it typical, based on the Vernon Jordan you know,  
 3 or know about, that he would be taking somebody -- not  
 4 meaning to insult Ms. Lewinsky at all, but somebody at her  
 5 level in life to see an attorney, over an issue like this?  
 6 A I just -- I -- I mean, I don't -- I don't recall  
 7 Vernon getting involved with many people at that level.  
 8 Q And were you similarly surprised to hear that he  
 9 had been helping Ms. Lewinsky to obtain employment?  
 10 A Yes.  
 11 BY MR. BINHAK:  
 12 Q And were you surprised there for the same reason?  
 13 A Yes. Yeah, because of his level, and as I  
 14 described it, that's right.  
 15 MR. WISENBERG: Pardon me for just a moment.  
 16 (Brief consultation.)  
 17 MR. WISENBERG: Pardon us. I apologize for  
 18 conferring with my colleagues.  
 19 BY MR. WISENBERG:  
 20 Q You mentioned -- when you were mentioning early the  
 21 two or three historical incidents that had caused you to  
 22 speak to the President about the appearance problem, do you  
 23 recall if -- I believe the only name you could recall was  
 24 [REDACTED] is that correct?  
 25 A Yes.

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1 Q Do you recall that one of these might have involved  
 2 -- one of the incidents might have involved Kathleen Willie  
 3 or Willey?  
 4 A No, I do not.  
 5 Q Have you heard anything from any source, including  
 6 rumor, hearsay, which based on your full knowledge has caused  
 7 you to -- has caused you to conclude that there may have been  
 8 sexual activity between Ms. Lewinsky and the President?  
 9 A No, I -- I am not aware -- personally aware of any  
 10 improper relationship between the President and Ms. Lewinsky.  
 11 Q Is there any information relevant to our inquiry,  
 12 as I have described it to you, that I haven't asked you  
 13 about, or you haven't told us about?  
 14 A No. You have been pretty thorough.  
 15 Q Have you spoken to anybody at the White House about  
 16 your testimony here today?  
 17 A No, I have not.  
 18 MR. WISENBERG: I am going to ask you if you would  
 19 step outside for a few moments and -- while I confer with the  
 20 grand jurors.  
 21 THE WITNESS: Okay.  
 22 MR. WISENBERG: May the witness be excused?  
 23 FOREPERSON: Yes.  
 24 (Witness excused. Witness recalled.)  
 25 FOREPERSON: Mr. Panetta, I would like to remind

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1 you, you are still under oath.  
 2 THE WITNESS: Thank you.  
 3 MR. WISENBERG: Let the record reflect that we have  
 4 a quorum, and that Mr. Panetta has returned.  
 5 BY MR. WISENBERG:  
 6 Q Mr. Panetta, I have got a couple more map questions  
 7 for you.  
 8 My first question is -- and actually you don't need  
 9 the map to answer this, but my first question is, is there  
 10 security at the Pantry door? In the sense of, number one,  
 11 are there Secret Service agents stationed right outside the  
 12 Pantry door?  
 13 A There -- usually in the area between Walkway 2 and  
 14 Walkway 1 are a combination of Secret Service agents, the  
 15 President's detail, and uniform Secret Service individuals,  
 16 the White House police.  
 17 Q You testified that --  
 18 A So that the answer to your question is that  
 19 normally that door is watched by -- and that hallway really  
 20 is watched by both the agents as well as the uniform police.  
 21 Q All right. But is there -- are there either agents  
 22 or uniform police stationed right at the Pantry door?  
 23 A Right at the door, no. They would be either a  
 24 little bit beyond -- I mean, they are not standing right in  
 25 front of the Pantry door.

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1 Q Do you recall whether or not there is running water  
 2 in the Pantry area?  
 3 A I believe there is. I believe there is. Because  
 4 normally, he will -- the stewards there will make soup, and  
 5 actually, you know -- they -- I think they have got not only  
 6 a small stove and, you know, other ways to kind of fix food,  
 7 but I'm pretty sure there is running water there.  
 8 Q I asked you a series of --  
 9 MR. WISENBERG: The -- I asked you a series -- are  
 10 there any other questions along those lines you all would  
 11 like to ask?  
 12 A JUROR: Is it possible the one portion is in the  
 13 pantry.  
 14 Q Is it possible, based on your answers, that our  
 15 mystery space here could be the Pantry?  
 16 A It -- well, you know, I've noticed. I mean, as I  
 17 said, I don't know the particular date for this map, but it  
 18 could well be that -- I mean -- that that area here that  
 19 opens up into Walkway 2 could be the entrance to the Pantry.  
 20 I don't know of any other door that leads off of  
 21 that area, in that vicinity, other than the Pantry door.  
 22 Q Okay. The -- so, in other words, you have got  
 23 the -- you have talked about the door with the security lock.  
 24 A Right.  
 25 Q And then you've got the Pantry door, whichever door

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1 that is, and then you have got the door to the Oval Office;  
 2 is that correct?  
 3 A The two doors to the Oval Office -- or three doors,  
 4 really, I guess. Exterior.  
 5 Q Now -- but let me -- as -- as -- in terms of doors  
 6 that open off of Walkway 1 and 2, okay, starting with --  
 7 starting with the one that you have testified to us is  
 8 usually locked -- is locked, closed and locked, that is the  
 9 right -- on the upper left part of the Oval Office complex  
 10 dining room, correct?  
 11 A That is correct.  
 12 Q Let's start there and let's talk about doors that  
 13 open off of hallways south. Okay.  
 14 A All right.  
 15 Q You have got that door?  
 16 A Yes.  
 17 Q Okay. Then you have got the Pantry door, whether  
 18 it is the little space to the right of the fireplace, or the  
 19 one that looks like a --  
 20 A That's correct.  
 21 Q -- a map of Texas, somewhat?  
 22 A That is correct.  
 23 Q Okay. Then your next door that opens southward, or  
 24 in this case would be southeastward, is your door to the Oval  
 25 Office; is that correct?

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1 A Off -- yeah, off Walkway --  
 2 Q Number two?  
 3 A -- No. 2.  
 4 Q All right. So if --  
 5 A Those -- those are the three doors --  
 6 Q Okay.  
 7 A -- that I am aware of, that would open into that  
 8 area.  
 9 Q So if that little panhandle-ish type area in  
 10 our mystery room -- which I have said looks a little like  
 11 Texas -- if that is the door then that room is the Pantry?  
 12 A That is right.  
 13 MR. WISENBERG: Okay. Any other questions about  
 14 the Pantry you all want me to ask?  
 15 (No response.)  
 16 Q Now, when I asked you a series of questions before  
 17 about where Secret Service agents were posted in the  
 18 Reception Area, the Oval Office, Walkway 2, Study, Hall 1,  
 19 Oval Office complex, I didn't mention uniformed officers.  
 20 In response to my last -- one of my previous  
 21 questions you are telling me that there are also uniformed  
 22 officers in the Walkway 2 area; is that correct?  
 23 A There was normally a uniformed officer in the  
 24 walk -- in the area between Walkway 1 and Walkway 2.  
 25 Q Okay. Now, other than that uniformed officer

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[1] there, any uniform officer in Reception Area 1, Oval Office?  
 [2] A No.  
 [3] Q Okay. The rooms that I had gone over before?  
 [4] A No.  
 [5] Q Okay. I want to ask you this question again. I  
 [6] would like you to listen very carefully. I know it is a  
 [7] somewhat convoluted question so if there is anything about it  
 [8] you don't understand I will -- I will re-ask it for you.  
 [9] And this question is to go up until -- up until  
 [10] now. In other words, up until this moment in time.  
 [11] Have you heard anything, up until this moment in  
 [12] time, as we speak, from any source which based on your full  
 [13] knowledge, either personal, hearsay, whatever, has caused you  
 [14] to conclude that there may have been sexual activity between  
 [15] Monica Lewinsky and the President?  
 [16] A No, there isn't. The only -- I mean, the only  
 [17] information that is in my mind any way relevant was the  
 [18] discussion I had with Evelyn Liebermann. But that clearly  
 [19] did not include any reference to, you know, any sexual  
 [20] activity. It was the appearance of it that was of concern.  
 [21] MR. WISENBERG: Let me ask you to step out again,  
 [22] and we might just come and -- let me ask you to step out one  
 [23] more time very briefly.  
 [24] (Witness excused. Witness recalled.)  
 [25] FOREPERSON: You are still under oath, Mr. Panetta.

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[1] THE WITNESS: I understand.  
 [2] MR. WISENBERG: Let the record reflect we have a  
 [3] quorum. The witness has returned.  
 [4] BY MR. WISENBERG:  
 [5] Q I want to try varying to this question again. And  
 [6] let me exclude from the question newspaper, newspaper  
 [7] accounts, at least for my question here.  
 [8] A Okay.  
 [9] Q You have -- because when you answered the last  
 [10] question you related it back to the Liebermann incident.  
 [11] Have you heard -- have you heard anything, other  
 [12] than from newspaper and press accounts, from any source, at  
 [13] any time including up to the present, which, based on  
 [14] everything you know leads you to -- leads you to conclude --  
 [15] just to conclude, not to a certainty, but to conclude in your  
 [16] mind that there may have been some sexual activity between  
 [17] Ms. Lewinsky and the President?  
 [18] A No.  
 [19] MR. WISENBERG: Now, are there any questions?  
 [20] BY MR. UDOLF:  
 [21] Q I have a question. I'm not going to ask your  
 [22] opinion or ask for any conclusions, but I would like to know,  
 [23] Mr. Panetta, earlier you told us that Ms. Liebermann had  
 [24] expressed some concern about Monica Lewinsky's behavior, and  
 [25] you described it as generally gawking or hanging around.

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[1] Do you know what precipitated that particular  
 [2] report to you, was there one particular incident that she was  
 [3] concerned about?  
 [4] A No. I don't -- I don't know, you know, in  
 [5] particular what it was. I assume that Evelyn had seen her  
 [6] there, or hanging around, and that it was based on that that  
 [7] she had taken her action.  
 [8] Q Do you --  
 [9] A But I -- specifically what that was, I don't know.  
 [10] Q Had there been equal hanging around or gawking  
 [11] before? Was that an unusual thing?  
 [12] A Well, we definitely try to -- you know, if we saw  
 [13] anybody doing that kind of thing we would -- we would act to  
 [14] limit it. But this was the one instance that I can recall.  
 [15] Q He is the President of the United States, and it  
 [16] wouldn't be unusual for people to --  
 [17] A No.  
 [18] Q -- I don't know if I would use the term gawk, but  
 [19] maybe stare or want to be around the area that he was in; is  
 [20] that correct?  
 [21] A Sure. I mean, I -- you know, there -- there  
 [22] were -- obviously, there were people sometimes that would be  
 [23] taken through the White House that would always want to catch  
 [24] a glimpse of the President. And, for that matter, even  
 [25] employees within the White House would sometimes when they

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[1] went into the Reception Area No. 1 would dally a little bit  
 [2] in the hopes of seeing the President.  
 [3] Q I guess my question is, other than Monica Lewinsky,  
 [4] who was transferred out of the White House for dallying  
 [5] around -- or spending an excessive amount of time in the area  
 [6] where the President was likely to be?  
 [7] A That was the only occasion I was aware of.  
 [8] Q Did you have a sense that the reason she was asked  
 [9] to leave was precipitated by something other than just merely  
 [10] dallying around, or gawking?  
 [11] A That -- I mean, that was not part of the discussion  
 [12] I had with Evelyn. I mean I -- I kind of -- I mean, Evelyn  
 [13] and I have a very close relationship, and when she said  
 [14] something like, "You know there is somebody that is just  
 [15] standing around and it's -- you know -- it is creating a bad  
 [16] appearance," we kind of understood, you know, what she meant.  
 [17] Q If --  
 [18] A I just -- you know, that -- it wasn't -- there  
 [19] wasn't any question in my mind that -- you know, that if  
 [20] Evelyn thought that there was a potential problem that she  
 [21] would act on it.  
 [22] Q Was there -- was there really a need to explore the  
 [23] underlying basis for the problem?  
 [24] A Not -- I mean, not as far as I was concerned. If  
 [25] she was concerned that somebody was standing around and she

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[1] wanted to get rid of them, that is fine with me.  
 [2] Q So I guess the answer is you would -- if there was  
 [3] something that precipitated her concern to such a level that  
 [4] she thought that Monica Lewinsky ought to be banned from the  
 [5] West Wing there was no need to -- to communicate that  
 [6] particular incident to you?  
 [7] A No.  
 [8] BY MR. WISENBERG:  
 [9] Q Given your --  
 [10] MR. WISENBERG: Oh, I'm sorry.  
 [11] FOREPERSON: I have a quick question. Within the  
 [12] employees that work in the West Wing, along with interns, is  
 [13] there a written dress code?  
 [14] THE WITNESS: There are -- at the time that interns  
 [15] come it I believe they are briefed as to what they are  
 [16] expected to wear in --  
 [17] FOREPERSON: Is it written?  
 [18] THE WITNESS: -- their positions. I believe it is.  
 [19] I have -- I can't tell you that I specifically have seen it,  
 [20] but I know that we raised the question that we wanted to have  
 [21] people briefed properly on what they should wear in the White  
 [22] House at all times. And, again, Evelyn would enforce that  
 [23] code.  
 [24] FOREPERSON: Okay. Would Evelyn ever bring to you  
 [25] attention, in your discussions about inappropriate dress --

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[1] would she ever bring to your attention the fact that some of  
 [2] the ladies skirts may be too short, or what type of --  
 [3] THE WITNESS: Yes.  
 [4] FOREPERSON: -- dress code.  
 [5] THE WITNESS: Yes.  
 [6] FOREPERSON: Dress being too short?  
 [7] THE WITNESS: Yeah. If the dress was too short she  
 [8] would usually tell them.  
 [9] FOREPERSON: Do you recall in your conversation  
 [10] with Ms. Liebermann if with Ms. Lewinsky that was ever an  
 [11] issue with -- besides the gawking, was her dress code in line  
 [12] with what was expected from employees in this area of the  
 [13] White House?  
 [14] THE WITNESS: I -- I don't remember it specifically  
 [15] relating to, you know, to skirt, but appearance was one of  
 [16] the concerns she had.  
 [17] FOREPERSON: Do you recall --  
 [18] THE WITNESS: Her appearance.  
 [19] FOREPERSON: Do you recall in what way her  
 [20] appearance was not acceptable?  
 [21] THE WITNESS: I don't remember. I don't remember a  
 [22] specific discussion about that. Except that, you know, she  
 [23] just didn't like the way she looked, and she didn't like her  
 [24] standing around.  
 [25] FOREPERSON: Thank you.

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[1] BY MR. UDOLF:  
 [2] Q I have another question. I assume that since this  
 [3] story has come out in the past week or so that you have had  
 [4] several discussions with your friends and colleagues from the  
 [5] Washington area; is that a fair assumption? About this  
 [6] matter.  
 [7] A Not really that much. I mean, I have -- I have  
 [8] been barraged, as you can imagine, by a lot of press calls  
 [9] and, frankly, I have not responded to most of them. As to  
 [10] people, you know, that are friends the discussions have been  
 [11] pretty limited.  
 [12] I haven't gone into this issue at all.  
 [13] Q Sometimes when things -- things like this come to  
 [14] light people are likely to say, "Well, yeah, I knew about  
 [15] this all along." Or, "I heard about this incident a long  
 [16] time ago, or this incident." Has anyone approached you with  
 [17] anything like that, or told you that they were aware of  
 [18] certain -- certain incidents that they had observed in the  
 [19] White House?  
 [20] A No.  
 [21] Q That were related to this matter.  
 [22] A No.  
 [23] FOREPERSON: By news reports -- and I'm not saying  
 [24] that this is definite, but I just would like to ask you  
 [25] something based on a possibility. It was said in the news

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[1] that the First Lady began manning the phones over the  
 [2] weekend, to call friends and garner support for the President  
 [3] in these -- in this crisis.  
 [4] Did you receive a phone call from the First Lady or  
 [5] the President himself over the weekend, to help support the  
 [6] President during this time of crisis?  
 [7] THE WITNESS: No, I did not.  
 [8] FOREPERSON: Thank you.  
 [9] BY MR. WISENBERG:  
 [10] Q If -- I want to go back to my example of Ms.  
 [11] Lewinsky. Let's say that you had heard -- you were still  
 [12] Chief of Staff, after the incident with Evelyn Liebermann she  
 [13] says she is going to transfer her -- for the reasons you have  
 [14] testified -- you assume it is done.  
 [15] Are you with me so far?  
 [16] A Yes.  
 [17] Q You then find out that on approximately fifteen  
 [18] occasions this individual has come at various times and been  
 [19] allowed access to the West Wing area, including this  
 [20] Reception Area 1.  
 [21] Are you with me so far?  
 [22] A Yes.  
 [23] Q If you found out -- I think you said before you  
 [24] found -- if you found it out you would go to Evelyn  
 [25] Liebermann and say, "What the heck is going on?" Correct?

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[1] A That is right.  
 [2] Q And if she said the President said so you would go  
 [3] to the President and demand an explanation --  
 [4] A That is right.  
 [5] Q -- is that correct? If you found out that any  
 [6] employee, other than the President -- you found out that any  
 [7] employee had allowed Ms. Lewinsky in, without the knowledge  
 [8] of the President, any employee in these approximately  
 [9] incidences in my example, would you be ticked at that  
 [10] employee?  
 [11] A Yes. I -- I would be concerned if -- if she was  
 [12] being admitted on a regular basis, no matter who was  
 [13] responsible.  
 [14] Q Would it be fair to say that employee who would do  
 [15] that without the knowledge and approval of the President, if  
 [16] you were Chief of Staff, would be gone?  
 [17] A Well, I think you would have to -- you would have  
 [18] to determine, you know, what was involved here, and what the  
 [19] nature of the reason was that was being presented. But if it  
 [20] was not a sufficient reason, and if it was, you know, not  
 [21] clear as to, you know, whether there was a specific  
 [22] responsibility for this person that they were relying on,  
 [23] then that would be a very serious matter, you know, as to  
 [24] what steps we would take. And it would be based on whatever  
 [25] information we got.

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[1] Q I believe -- I'm sorry. Pardon me just a moment.  
 [2] (Brief pause.)  
 [3] Q Given the -- given the circumstances under which  
 [4] she was transferred out, do you find it strange, odd, unusual  
 [5] -- if in fact the press reports are accurate -- that she was  
 [6] admitted on about fifteen occasions to the West Wing Oval  
 [7] Office general area?  
 [8] A It is unusual for an individual who is assigned to  
 [9] the Pentagon at her level to have that much access.  
 [10] Q So the answer is?  
 [11] A Yes.  
 [12] Q Yes?  
 [13] A Yes.  
 [14] BY MR. BINHAK:  
 [15] Q Who would have had the authority to invite her in  
 [16] after she had been at the Pentagon -- to the West Wing?  
 [17] A Well, I mean, you know -- the problem here is that,  
 [18] obviously, individuals can provide a clearance for people  
 [19] coming into the White House. They just -- you know, they  
 [20] give their name and say, "This is the reason," that they  
 [21] should be admitted. And it is a little difficult to,  
 [22] obviously, track the hundreds upon hundreds of people who --  
 [23] and sometimes thousands of people who come into the White  
 [24] House on a particular day, or a particular week.  
 [25] So, it is -- it is very difficult to oversee, you

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[1] know, the reasons people allow others to come into the White  
 [2] House complex, because people can -- you know -- call the  
 [3] station there and basically say, you know, they are coming in  
 [4] for -- you know -- whatever reason and they will get access.  
 [5] Q But if someone was working -- say if you had worker  
 [6] Smith in the Old Executive Office Building, and the call came  
 [7] from the gate and they let visitor Jones come in, could  
 [8] visitor Jones then go to the West Wing?  
 [9] A Normally people could -- did not have access to the  
 [10] West Wing unless they had a special pass.  
 [11] Q So, is it fair to say then that somebody -- if  
 [12] Monica Lewinsky was coming into the West Wing on a regular  
 [13] basis somebody from the West Wing was inviting her into the  
 [14] West Wing after she was working at the Pentagon?  
 [15] A That is correct.  
 [16] Q All right. And you have testified that you did not  
 [17] invite her in after that?  
 [18] A Absolutely not.  
 [19] Q And you believe that it is not --  
 [20] MR. WISENBERG: Liebermann?  
 [21] Q Ms. Liebermann, you certainly don't think it was  
 [22] her, based on what she told you, correct?  
 [23] A No. You better believe it.  
 [24] Q So -- and you have identified certain other people  
 [25] who work in that area of the building. There is Erskine

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[1] Bowles, or Harold Ickes, did either of those people tell you  
 [2] that they had invited Monica Lewinsky in?  
 [3] A I mean, I don't know -- what period are we talking  
 [4] about, because --  
 [5] Q After she --  
 [6] A -- I may well have left as Chief of Staff during  
 [7] that period. So I don't know, you know, the particulars.  
 [8] The -- but Erskine Bowles would not have been there. It  
 [9] would be probably Evelyn that was there, or Harold Ickes.  
 [10] MR. BINHAK: Okay. I have no further questions.  
 [11] BY MR. WISENBERG:  
 [12] Q Do you have to be at a fairly -- at a certain level  
 [13] of authority to be able to get somebody into the West Wing,  
 [14] with a pass?  
 [15] A Yeah. Normally it is -- I mean, it would be a  
 [16] presidential assistant that -- who works in the West Wing,  
 [17] that would allow people to come in.  
 [18] BY MR. UDOLF:  
 [19] Q Did Ms. Currie have that authority?  
 [20] A Oh, certainly. She is -- obviously, works for the  
 [21] President.  
 [22] BY MR. WISENBERG:  
 [23] Q The question that I have tried to ask in various  
 [24] forms, three or four times, have you heard anything from any  
 [25] source which, based on your full knowledge, has caused you to

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[1] conclude that there may have been sexual activity between  
 [2] Monica Lewinsky and the President, would you rather -- is it  
 [3] that you consider that an opinion type question that you  
 [4] would just rather not answer? That is asking your opinion,  
 [5] kind of, on the issue?  
 [6] A I -- I mean, in part it is opinion, but in part,  
 [7] you know, I did not receive, you know, either rumor or  
 [8] information to that effect, that I can recall.  
 [9] FOREPERSON: I would like for you to repeat the  
 [10] question again, but could you replace it by anyone, not just  
 [11] Ms. Lewinsky  
 [12] BY MR. WISENBERG:  
 [13] Q All right. And again we are not -- I would like  
 [14] you to focus on the -- on the exact words. Have you heard  
 [15] anything from any source which based -- anything up to today,  
 [16] from any source which, based on our full knowledge, has  
 [17] caused you to think, or conclude that there may have been  
 [18] sexual activity between the President and anybody, other than  
 [19] the First Lady?  
 [20] A I -- I honestly am not aware of -- I mean I -- of  
 [21] someone coming to me, or even through rumor, saying that, you  
 [22] know, they suspect the President is having a relationship  
 [23] with someone else.  
 [24] I really do not recall receiving that kind of  
 [25] information, or, for that matter, even rumor.

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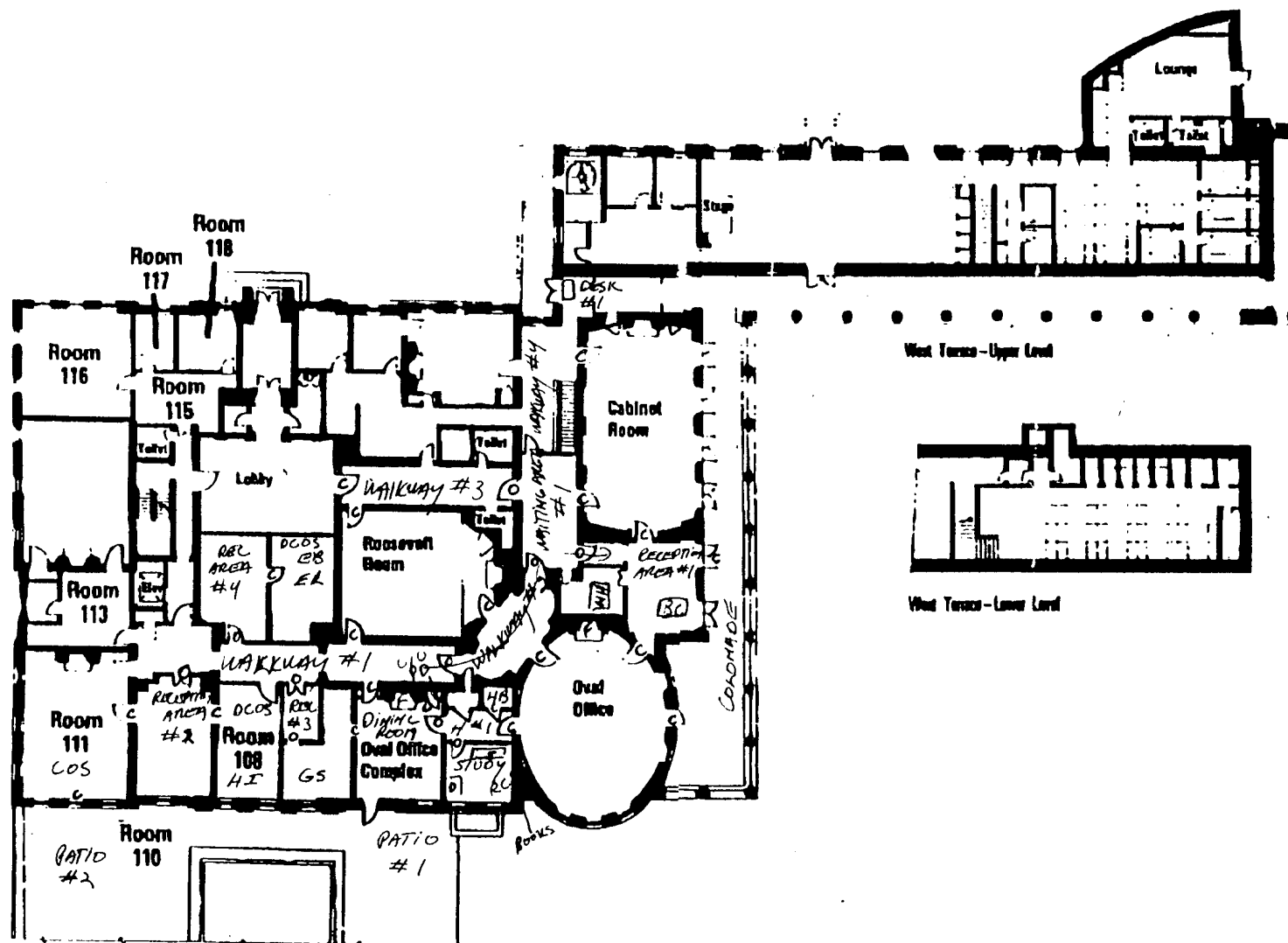
[1] MR. UDOLF: Does that answer your question?  
 [2] FOREPERSON: (Nodding.) Thank you.  
 [3] MR. WISENBERG: Mr. Panetta, I believe that is our  
 [4] last question. Anybody disagree with me?  
 [5] (Laughter.)  
 [6] MR. WISENBERG: Okay. Let's just instruct you that  
 [7] it often happens, even with witnesses questioned as  
 [8] thoroughly as you have been questioned, or boringly --  
 [9] whatever your feeling may be -- that a witness will leave the  
 [10] grand jury room and be driving his or her car and think, "I  
 [11] remember the answer, oh, my God, why didn't I think of that."  
 [12] If something like that happens to you we would -- I  
 [13] would appreciate it if you would get in touch with Agent Pat  
 [14] Fallon, or any of the FBI Agents assigned to our office, and  
 [15] let us know about that.  
 [16] THE WITNESS: I will.  
 [17] MR. WISENBERG: Thank you very much.  
 [18] May the witness be excused?  
 [19] FOREPERSON: Yes, he may.  
 [20] (The witness was excused.)  
 [21] (Whereupon, at 4:25 p.m., the taking of the  
 [22] testimony in the presence of a full quorum of the Grand Jury  
 [23] was concluded.)  
 [24] .....  
 [25]

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# First Floor



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- 1 -

## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 05/22/98

STEVEN PHILIP PAPE, white, male, date of birth [REDACTED], [REDACTED], United States Secret Service (USSS), Uniformed Division was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, NW, Washington, DC, 20004. Also present for the interview were Associate Independent Counsel (AIC) MARY ANNE WIRTH and AIC MICHAEL TRAVERS, Department of Justice (DOJ) attorneys DAVE ANDERSON and JANIS KESTENBAUM, and JOHN ROWLEY, an attorney representing PAPE. PAPE was interviewed under the terms of an agreement between DOJ and OIC. PAPE was apprised of the official identity of the interviewers and the nature of the interview and thereafter provided the following information:

PAPE has been employed by the USSS since January 7, 1991. PAPE was unassigned at the White House for the first four years of his career and thereafter was assigned to the Southwest gate. PAPE explained that he would work various assignments while unassigned, including the Control Center and the Waves Center.

PAPE advised that there are normally three officers assigned to the Southwest gate, which is also known as the B-4 post. PAPE stated that one officer is assigned to the South Grounds gate, which is just to the south and east of the Southwest gate. The South grounds gate is also known as the B-3 post. PAPE stated that two officers are in a blocking vehicle located on E street, to the south of the White House grounds. PAPE said that an additional two officers rotate among the aforementioned posts throughout the day.

PAPE said the officers assigned to the Southwest gate and related posts are divided into two sections, the B section and the C section. PAPE said the two sections alternate between working the 6:30 a.m. to 3:00 p.m. shift and the 3:00 p.m. to 11:00 p.m. shift. PAPE said his supervisor is Sergeant SAMMY ESCAMAILLA.

PAPE advised the first time he met MONICA LEWINSKY was on West Executive Drive, the avenue that runs between the White House and the Old Executive Office Building. LEWINSKY was either an intern or a White House passholder at the time and she asked PAPE about the President's schedule. PAPE told her to look in

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Investigation on 05/18/98 at Washington, DC File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 05/22/98

29D-OIC-LR-35063

Continuation of OIC-302 of STEVEN PHILIP PAPE, On 05/18/98, Page 2

the newspaper. LEWINSKY responded with another question about the President going to Room 450 of the OEOB. PAPE then told LEWINSKY to ask the press.

Prior to meeting LEWINSKY on the occasion described above, PAPE had heard a rumor that LEWINSKY was hanging around the West Wing, trying to see the President. In addition, someone in the USSS told PAPE that they had seen LEWINSKY hovering around the East steps of the OEOB, waiting for the President to pass by.

PAPE does not recall another encounter with LEWINSKY while she worked at the White House.

PAPE advised that he heard other rumors about LEWINSKY. PAPE heard that LEWINSKY was infatuated with the President and that she spent a lot of time trying to see the President. PAPE heard that LEWINSKY was caught in the family theater of the White House with the President. PAPE heard this was the reason LEWINSKY and [REDACTED] were transferred.

PAPE never heard about LEWINSKY's job performance. Around the time [REDACTED] was transferred, PAPE heard a rumor that [REDACTED] was transferred. PAPE looked [REDACTED] photograph up on the computer, to make sure he could identify her if she tried to gain access into the White House complex. PAPE heard [REDACTED] termination was not on good terms.

Eventually, PAPE was formally notified of [REDACTED] being transferred. PAPE advised this notification usually takes the form of a memorandum or an e-mail. PAPE advised it is not common practice to notify the USSS of every employee who leaves employ at the White House. However, USSS is notified of those employees who leave on unfavorable terms.

PAPE is not sure if he received formal notification of LEWINSKY's transfer. PAPE advised that he heard rumors that something was going on between LEWINSKY and the President. PAPE also heard that LEWINSKY was a stalker and that she hung out too much near the West Wing.

After LEWINSKY was transferred, PAPE heard various rumors about her. PAPE heard stories about LEWINSKY coming to see the President after she was transferred. PAPE then saw LEWINSKY on numerous occasions at the Southwest gate. PAPE can only recall three specific occasions, but believes there were more. PAPE advised LEWINSKY typically would come to the Southwest gate, show her identification and go into the White

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Continuation of OIC-302 of STEVEN PHILIP PAPE . On 05/18/98 . Page 3

House after PAPE would make sure LEWINSKY had an appointment.

PAPE advised that LEWINSKY would always advise she was there to see the President, until the Summer of 1997, after which LEWINSKY advised she was there to see CURRIE. PAPE advised that when he checked the Waves system to ensure LEWINSKY had an appointment, the system would show that LEWINSKY's appointment was made by CURRIE, and that LEWINSKY was there to see either CURRIE or the President.

PAPE advised he would typically call the E-1 post, the next post a visitor to the West Wing would see, to advise LEWINSKY was on her way. In addition, PAPE would sometimes call CURRIE to advise LEWINSKY was on her way. PAPE does not recall ever being notified by CURRIE that LEWINSKY was on her way to the White House.

PAPE heard from Officer SCOTT LEWIS that LEWINSKY came to the Southwest gate during the midnight shift, which is between 11:30 p.m. and 6:30 a.m.. LEWIS said that this incident occurred after LEWINSKY left employ and that LEWINSKY came into the White House carrying a rose.

One of LEWINSKY's visits PAPE recalls specifically occurred on July 14, 1997. PAPE recalls it was a Monday and PAPE was just coming off of leave. LEWINSKY came to the gate and asked if she was cleared in to see CURRIE or the President. When PAPE said no, LEWINSKY asked if he was sure and told him to check the Northwest gate. PAPE did and informed LEWINSKY she was not scheduled for a visit. After several minutes, LEWINSKY was cleared in to the White House.

PAPE recalls occasions when he called CURRIE regarding LEWINSKY not being entered into the Waves system. On a couple of occasions, CURRIE called PAPE to ask whether LEWINSKY could be cleared in quickly or without going through the ordinary process of scheduling through the Waves system, or to schedule through the Waves system after LEWINSKY was already in the White House. PAPE refused to honor those requests since LEWINSKY was not considered a "VIP." PAPE inferred from CURRIE's tone, or her sigh, that CURRIE did not want to clear LEWINSKY in.

PAPE recalls another specific occasion LEWINSKY was cleared in to the White House occurring approximately thirty or thirty-two days after the July 14, 1997 incident. PAPE recalls clearing LEWINSKY in on a Saturday, around August 16. PAPE advised that CURRIE came to the White House in a jogging suit,

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which was not her typical meticulous dress. Five minutes after CURRIE arrived, LEWINSKY showed up at the Southwest gate. LEWINSKY did not have a previously scheduled appointment, but she was scheduled soon thereafter to see CURRIE. Within minutes of LEWINSKY gaining access to the White House, PAPE heard on his radio that the President moved from the White House residence to the West Wing. PAPE advised that CURRIE left the White House five minutes after LEWINSKY did.

PAPE advised he would see LEWINSKY exit the White House on some occasions, on others he would not.

PAPE recalls one occasion, which could have been a weekend, when he was training new Officers at the B-4 post when he saw LEWINSKY approaching the gate. PAPE told his trainees to watch how he handled the situation, because it was "by the book." PAPE may have also told the trainees to be careful around LEWINSKY, since she was the President's mistress.

PAPE advised this incident occurred on a very hot summer day. PAPE stated LEWINSKY was wearing a blue dress with white polka-dots. PAPE advised that officer MYRICK was assigned to the gate with PAPE. LEWINSKY was told to call whomever she was to meet. LEWINSKY advised she was having trouble getting in touch with anyone.

LEWINSKY had a package she said was intended for the President. PAPE described the package as a gift-wrapped box, a size large enough to contain a man's cummerbund. PAPE advised LEWINSKY asked to sit in the air-conditioned booth, because it was so hot outside. LEWINSKY was not allowed to sit in the officer's booth, but she eventually gained access to the complex.

PAPE advised he x-rayed the package, but did not have it inspected by the Technical Support Division, as he normally would. PAPE explained because LEWINSKY was the President's mistress, he did not want to treat her poorly or make her wait any more than was necessary, since it could come back on him. PAPE also stated that what was in the box would not hurt the President. If LEWINSKY wanted to hurt the President, she would do what LORENA BOBBITT did.

PAPE stated that by the time LEWINSKY got into the complex, she had sweat stains on her dress, her make-up was smeared and her hair was all frizzy. PAPE advised that LEWINSKY was wearing a lot of perfume. Once LEWINSKY left their presence, PAPE bet MYRICK that the President would move to the Oval office

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within ten minutes. PAPE won the bet when the President moved to the Oval Office approximately nine minutes and fifty seconds after LEWINSKY arrived.

PAPE heard that it was harder for LEWINSKY to get cleared into the White House after the Summer of 1997.

PAPE was told that on approximately December 29, 1997, LEWINSKY came to the White House with a package. Officers OLIVER JANNEY and DOUGLAS DRAGOTTA were on duty at the time. JANNEY processed LEWINSKY. PAPE assumed she was there to see the President.

PAPE never saw LEWINSKY away from the White House.

PAPE recalls one incident when LEWINSKY came to the Southwest gate while PAPE was in the back of the booth and Officer GREG LADOW was the primary officer in the booth. LEWINSKY was cleared in as a "press person," and PAPE thinks she was there to see MIKE McCURRY. PAPE advised press personnel do not normally come through the Waves system. PAPE thinks LEWINSKY had trouble getting an appointment with anyone else.

At one point, LADOW told PAPE that he thought LEWINSKY was a threat and LADOW wanted to put LEWINSKY on a "do not admit" list. PAPE explained that the USSS's job is to protect the President's physical safety as well as his public image. The do not admit list has been used for BILLY DALE of the White House Travel office, and for former Federal Bureau of Investigation (FBI) Special Agent GARY HARLOW. PAPE advised the rumors about LEWINSKY and the President were becoming more widespread at the time LADOW made the suggestion.

LADOW went to Lieutenant DAVE WOLTZ, the watch commander, to try to restrict LEWINSKY's visits. WOLTZ said that it was none of the USSS's business who the President saw. WOLTZ added that no one was going to find out about LEWINSKY anyway.

At about the same time, PAPE was told by GARY BYRNE that BYRNE was going to go to someone about LEWINSKY. PAPE advised that PAPE heard a rumor that BYRNE spoke to EVELYN LIEBERMAN about LEWINSKY.

PAPE advised that whenever he cleared LEWINSKY into the White House, the President would always move to the Oval Office, if he was not already there, shortly after LEWINSKY's entry. Because of this pattern, each time LEWINSKY came through the

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Southwest gate, PAPE would call the Control Center to advise LEWINSKY had arrived. PAPE stated that he would tell the Control Center that, because LEWINSKY had arrived, the Emergency Response Team should prepare for the President to move from the Residence to the Oval Office.

PAPE does not recall seeing LEWINSKY escorted by anyone from the White House Counsel's Office.

PAPE heard a rumor about LEWINSKY coming to the Northwest gate when BRYAN HALL was on duty. PAPE heard that LEWINSKY was told she would have to wait at the Northwest gate because another woman was in the Oval Office with the President. PAPE advised that once LEWINSKY gained access to the White House, she crossed paths with the other woman.

PAPE advised he heard, as a part of this rumor, that Sergeant WILLIAMS and Captain PURDIE are the other names associated with this incident. PAPE also heard that CURRIE was upset over what was said and the fact that someone would tell an outsider what was occurring on the inside of the White House. PAPE said CURRIE was the gatekeeper for the President.

PAPE advised he asked BRYAN HALL about this incident approximately two weeks after it was supposed to have occurred and HALL denied it ever happened. PAPE felt HALL was being truthful. PAPE is not aware of any disciplinary action taken as a result of the Northwest gate incident.

PAPE heard a rumor that LEWINSKY was in the Oval Office and was seen by NANCY HERNREICH. PAPE heard that Officer JOHN MUSKETT was on duty at the E-6 post at the time. HERNREICH got upset and told the Chief of Staff, LEON PANETTA, or the Deputy Chief of Staff, HAROLD ICKES. MUSKETT was then called by the USSS liaison with the White House staff, First Name Unknown (FNU) O'MALLEY. O'MALLEY called MUSKETT to his office to ask MUSKETT about the incident. MUSKETT asked O'MALLEY what else he was supposed to do in those circumstances.

[REDACTED]

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Continuation of OIC-302 of STEVEN PHILIP PAPE . On 05/18/98 , Page     

PAPE recalls reading in Newsweek about LEWINSKY having couriers bring packages to the White House. PAPE recalls one occasion when CURRIE came to the Southwest gate to sign for a package that PAPE assumes was intended for the President. PAPE advised CURRIE would normally send an aide to retrieve packages.

PAPE recalls LEWINSKY visiting on a day of significance to the President, either his 50<sup>th</sup> birthday, his wedding anniversary or Mother's Day. PAPE recalled he thought it was ironic for LEWINSKY to visit on the day he had in mind.

PAPE recalls speaking to CURRIE approximately two to three times, but does not think CURRIE knows his name.

PAPE provided a hand drawn sketch of the Southwest gate area, a copy of which is attached. The original of the sketch was filed in an FD-340 with the Agent's original notes of the interview.



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- x  
IN RE: :

GRAND JURY PROCEEDINGS :  
:
 

----- x

Grand Jury Room No. 3  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C.  
Wednesday, August 5, 1998

The testimony of STEVEN PHILIP PAPE was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997 commencing at 3:22 p.m. before:

EDWARD PAGE

Associate Independent Counsel

MARY ANNE WIRTH

Office of Independent Counsel

1001 Pennsylvania Avenue, N.W.

Suite 490 North

Washington, D.C. 20004

PROCEEDINGS

1 Whereupon,

3 STEVEN PHILIP PAPE

4 was called as a witness and, having been first duly sworn by  
5 the Foreperson of the Grand Jury, was examined and testified  
6 as follows:

EXAMINATION

8 BY MR. PAGE:

9 Q Sir, would you tell us your full name, please?

10 A My full name is Steven, with a "v," Philip with one  
11 "l," Pape, it's pronounced. The last name is P-a-p-e.

12 MR. PAGE: Before we get started with your  
13 questions, Madam Foreperson, do we have a quorum?

14 THE FOREPERSON: Yes, we do.

15 MR. PAGE: And is it correct to say that there are  
16 no unauthorized persons in the grand jury room?

17 THE FOREPERSON: That is correct.

18 MR. PAGE: Thank you.

19 BY MR. PAGE:

20 Q Is it Officer Pape?

21 A Yes, sir.

22 Q Officer, I want to go over with you some of your  
23 rights and responsibilities in your appearance here before  
24 the grand jury, before we ask you some questions. Okay?

25 A Okay.

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CONTENTS

WITNESS:

PAGE

Steven Philip Pape

3

GRAND JURY EXHIBITS:

No. SP-1 - Report of interview of Mr. Pape's in the

Office of Independent Counsel, 5-22-98

14

...

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1 Q So please listen up. And if you do have any  
2 questions as I explain some of these things to you, please  
3 feel free to interrupt. All right?

4 First of all, my name is Edward Page. I work for  
5 the Office of Independent Counsel. And to my left is Mary  
6 Anne Wirth, who I understand you may have met before.

7 A Yes, sir.

8 Q Both of, but primarily Ms. Wirth, will be asking  
9 you some questions after we go over these preliminary  
10 matters.

11 To your left is the court reporter, and it's her  
12 job to take down what is being said, both questions and  
13 answers, during your appearance here today. Do you  
14 understand that?

15 A Yes, sir.

16 Q The first thing I want to review with you is that  
17 you understand that, under the rules that govern your  
18 appearance before the grand jury, that what you say here  
19 today is secret, as a matter of law, and that only you can  
20 disclose to others outside the grand jury what took place  
21 here today. Do you understand that?

22 A Yes, sir.

23 Q You've heard that, probably, called grand jury  
24 secrecy; correct?

25 A Yes, sir.

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1 Q There are a few exceptions to that. And that is  
 2 that if a court says that the Office of Independent Counsel  
 3 can disclose, or should disclose, or requires disclosure of  
 4 what you said here today, that it would be disclosed --  
 5 for example, if there is a case in court, or for some other  
 6 legal proceeding. Do you understand that?  
 7 A Yes, sir.  
 8 Q So, in other words, the rule is not absolute, but  
 9 it frequently is. Are you following me?  
 10 A Yes, sir.  
 11 Q Under the law, you have certain rights when you  
 12 make an appearance in front of a Federal grand jury, and I  
 13 want to ask you now if you understand the ones that I'm going  
 14 to talk to you about.  
 15 First of all, you have the Fifth Amendment right to  
 16 remain silent. Do you understand that?  
 17 A Yes, sir.  
 18 Q Do you understand further that anything that you  
 19 say can and may be used against you by this grand jury or in  
 20 a subsequent legal proceeding?  
 21 A Yes, sir.  
 22 Q Do you understand that the only thing that you can  
 23 refuse to answer about are matters that are privileged? For  
 24 example, the marital privilege, or the attorney-client  
 25 privilege, or a privilege --

1 investigation; you are a subject, in the broadest sense, of  
 2 the investigation. And that is that you are a person who the  
 3 Office of Independent Counsel and the grand jury believes  
 4 that may have pertinent information to the matters that the  
 5 grand jury has under investigation.  
 6 A Okay.  
 7 Q Do you understand that?  
 8 A Yes, sir.  
 9 Q Do you understand that, by taking the oath that the  
 10 foreperson administered to you a few moments ago, that you're  
 11 obligated to tell the truth?  
 12 A Yes, sir.  
 13 Q Do you understand that claiming faulty  
 14 recollection, when that is not accurate, is and can be  
 15 obstruction of justice?  
 16 A Yes, sir.  
 17 Q Do you have any questions before we start?  
 18 A I have none.  
 19 MR. PAGE: Thank you.  
 20 BY MS. WIRTH:  
 21 Q Officer, you've been employed by the Secret Service  
 22 since 1991; is that right?  
 23 A Yes, ma'am.  
 24 Q And you are in the Uniformed Division of the Secret  
 25 Service?

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1 A Correct. There's four. They went over them.  
 2 Q -- or a privilege, psychologist/psychiatrist  
 3 privilege; do you understand that?  
 4 A Yes, sir.  
 5 Q Do you understand further that since the litigation  
 6 has concluded, that there is no such thing anymore as a  
 7 protective function privilege?  
 8 A Yes, I do.  
 9 Q Do you understand that it is your job to claim any  
 10 of those privileges or any others that you think about that  
 11 might pertain to any of your testimony, that it's not our job  
 12 to do that?  
 13 A Okay.  
 14 Q To help you do that, you have some lawyers here  
 15 present outside the grand jury room, correct?  
 16 A Yes, sir.  
 17 Q Can you tell us who they are?  
 18 A My attorney is Bruce Blanchard, from Fairfax  
 19 County. I'm also in the union, so Mr. Leibig would also  
 20 offer advice -- Leibig.  
 21 Q Do you have some attorneys from Secret Service  
 22 -- for example, Tom Doherty -- that are representing you here  
 23 today, as well?  
 24 A They represent the Government, but they're here.  
 25 Q I represent to you that you're not a target of this

1 A Yes, ma'am.  
 2 Q You were unassigned at the White House for the  
 3 first four years of your career; is that correct?  
 4 A That is correct.  
 5 Q Eventually, you were assigned to the Southwest  
 6 Gate, or were you assigned to the Southwest Gate during that  
 7 period when you were unassigned?  
 8 A I would also possibly get that assignment. But,  
 9 for the last three years, I have been a permanent assignment  
 10 at the Main Gate, Southwest Gate.  
 11 Q At the what?  
 12 A At the Southwest Gate, Main Gate.  
 13 Q For how long, now?  
 14 A It will be three years in about 12 days.  
 15 Q Okay. And that's been your permanent assignment?  
 16 A Yes, ma'am.  
 17 Q And the Southwest Gate is also known as the B-4  
 18 post?  
 19 A Yes, ma'am.  
 20 Q Have you ever met Monica Lewinsky?  
 21 A Yes, ma'am.  
 22 Q Can you tell us about the first time that you met  
 23 her?  
 24 A Again, I think the very first time, I don't know  
 25 her status, if she was an intern or passholder at that time.

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<p>1 I bumped into her on West Exec, and --</p> <p>2 Q By "West Exec," you mean West Executive Drive?</p> <p>3 A West Executive Avenue, between the White House and</p> <p>4 the -- and the old buildings, within the complex, the secured</p> <p>5 area.</p> <p>6 Q And were you working that day?</p> <p>7 A Yes, ma'am.</p> <p>8 Q What was your post that day?</p> <p>9 A It could have been anywhere. It was just everybody</p> <p>10 crosses that road to get to their next post, it seems like.</p> <p>11 Q And what was your interaction with her that day, if</p> <p>12 any?</p> <p>13 A She inquired about the President's schedule, and</p> <p>14 what his schedule was that day.</p> <p>15 Q She asked you?</p> <p>16 A Correct.</p> <p>17 Q And what did you say?</p> <p>18 A It was -- I tried to kind of blow her off, because</p> <p>19 it was not a question most people asked. I think my first</p> <p>20 response was, "Check a newspaper."</p> <p>21 Q Did she ask you any other questions?</p> <p>22 A I think she asked me that same question twice, or</p> <p>23 something to that effect.</p> <p>24 Q Did she ever ask you a question about the President</p> <p>25 going to a specific room in the old EOB?</p>	<p>1 it was, you know -- hmm.</p> <p>2 Q Did you ever see her at the Southwest Gate?</p> <p>3 A Well, yeah, plenty of times I saw her at the</p> <p>4 Southwest Gate.</p> <p>5 Q All right. And how many times do you think you saw</p> <p>6 her at the Southwest Gate?</p> <p>7 A Minimum -- minimum of two, probably three, and I</p> <p>8 would say up to at least 10 times I personally cleared her</p> <p>9 in.</p> <p>10 Q Into the Southwest Gate?</p> <p>11 A At the Southwest Gate.</p> <p>12 Q I'm a little confused by what you just said. You</p> <p>13 said a minimum of two. Is that because you recall two</p> <p>14 specific dates?</p> <p>15 A I recall twice.</p> <p>16 Q And when you say maybe three, and then you said</p> <p>17 something like that you cleared her in 10 times, or</p> <p>18 approximately 10 times?</p> <p>19 A It could be as high as that.</p> <p>20 Q It could be as high as 10, that's what you're</p> <p>21 saying?</p> <p>22 A Correct.</p> <p>23 Q All right. Tell us about the two occasions you do</p> <p>24 remember, and if you remember dates, tell us what they are.</p> <p>25 Do you remember any occasions last summer, in 1997?</p>
Page 10	Page 12
<p>1 A Well, yeah, I think, because he had -- as I</p> <p>2 remember the schedule, the President was supposed to be</p> <p>3 coming from the West Wing into the old building that day, and</p> <p>4 so I think she phrased it a different way, or "Do you know</p> <p>5 when he's going to, you know, Room 474 Conference Room," or</p> <p>6 whatever.</p> <p>7 Q In the Old Executive Office Building?</p> <p>8 A In the old building. It would have been a bigger</p> <p>9 conference room.</p> <p>10 Q And what did you say to her?</p> <p>11 A Basically, I just, you know, said, "Check the Press</p> <p>12 Office" or, you know, I just kind of blew it off.</p> <p>13 Q Okay. And, to your memory that day, you don't know</p> <p>14 whether she was an intern or a passholder at the White House?</p> <p>15 A Correct.</p> <p>16 Q But she was employed at the White House at the</p> <p>17 time, in some capacity?</p> <p>18 A Well, interns aren't employed, they aren't paid.</p> <p>19 But she had a -- she had a pass. She was authorized to be</p> <p>20 there.</p> <p>21 Q All right. So she was either an intern or a</p> <p>22 passholder?</p> <p>23 A Yes, ma'am.</p> <p>24 Q When was the next time you saw her?</p> <p>25 A You may have seen her passing here and there, but</p>	<p>1 A Yeah. I -- I tell you what. Last time I gave the</p> <p>2 testimony, I remembered a little bit better. One was in July</p> <p>3 and one was in August.</p> <p>4 Q And when you "testimony," you had an interview with</p> <p>5 the Office of the Independent Counsel --</p> <p>6 A Correct.</p> <p>7 Q -- in the presence of an FBI agent?</p> <p>8 A Correct.</p> <p>9 Q And that took place in May of 1998? May, 1998?</p> <p>10 A Correct. But not when I cleared her in.</p> <p>11 Q I understand that.</p> <p>12 A Yes.</p> <p>13 Q And so when you say your memory was better, you're</p> <p>14 referring to May, as opposed to now?</p> <p>15 A Correct.</p> <p>16 Q Okay. I had asked you about times last summer, in</p> <p>17 1997, when you saw Monica Lewinsky. Do you remember any</p> <p>18 specific dates on which you saw her?</p> <p>19 A I want to say now it was like -- before I referred</p> <p>20 to -- I had some notes. I referred to them before.</p> <p>21 Q Did you bring your notes with you?</p> <p>22 A No, my attorney has them.</p> <p>23 Q Does your attorney have them outside?</p> <p>24 A I don't -- I don't think so. He just -- I just</p> <p>25 switched attorneys. So I just, I mean --</p>

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1 Q Are you talking about Mr. Riley may have your  
2 notes?  
3 A He might also have them. I think they both have a  
4 copy of it right now.  
5 Q Okay. Who is "they both"?  
6 A Mr. Riley, my old attorney, and Mr. Blanchard, my  
7 new attorney.  
8 Q Okay. But you don't --  
9 A JUROR: Excuse me. I'm having a hard time  
10 hearing you.  
11 THE WITNESS: I'm sorry. Mr. Riley was my old  
12 attorney, and Mr. Blanchard was my new attorney.  
13 BY MS. WIRTH:  
14 Q And Mr. Blanchard is outside?  
15 A Correct.  
16 Q Does he have your notes outside, do you know?  
17 A I don't know, but I would assume he doesn't.  
18 MS. WIRTH: Okay. Do you want to take a second to  
19 check if he does?  
20 THE WITNESS: Does he?  
21 BY MS. WIRTH:  
22 Q Anyway, what is your best memory of when you saw  
23 Monica Lewinsky last summer?  
24 A Again, I think one date was on July 18th or 28th,  
25 or something like that.

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1 MS. WIRTH: I'm marking as Grand Jury Exhibit SP-1.  
2 for your initials, this report, dated May 22, 1998, which I  
3 represent to you is a report of your interview in the Office  
4 of Independent Counsel.  
5 (Grand Jury Exhibit No. SP-1  
6 was marked for identification.)  
7 BY MS. WIRTH:  
8 Q And I'm turning your attention to the bottom of  
9 Page 3.  
10 A Okay.  
11 Q And I'll ask you just to look, to read for a moment  
12 to yourself, and to see if anything there refreshes your  
13 memory about when you saw Monica Lewinsky last summer.  
14 A Okay. I would say yes, this is -- this is more  
15 accurate.  
16 Q Does it refresh your memory?  
17 A Yes, it does.  
18 Q Okay. And when did you see Monica Lewinsky last  
19 summer?  
20 A I believe one was July 14th and the other was  
21 August 16th.  
22 Q Tell us about July 14, 1997. What happened that  
23 day? Where were you posted?  
24 A My normal post would be the Southwest Gate. And  
25 again, I've dealt with her so many times. I think one time

Page 15

1 it was a blistering summer day she had come up. Humidity was  
2 about 100 percent. It was hot. We knew who she was.  
3 Q When you say "we," who do you mean?  
4 A The other officers who were assigned to the post  
5 that day.  
6 Q Is there a trailer or some kind of a, you know,  
7 enclosure that you were in at the Southwest Gate?  
8 A It's a booth. It's a police booth.  
9 Q Is it air conditioned?  
10 A It works, on and off.  
11 Q What do you remember? Now, you're telling us, I  
12 believe, that one of those dates, either July 14th or August  
13 16th --  
14 A Correct.  
15 Q -- was a blistering hot day, you're not sure which  
16 one?  
17 A Correct.  
18 Q Tell us what you remember.  
19 A It was close to 90 degrees. Humidity was about  
20 100. She had come up, walked from the Ellipse. She was  
21 sweating, pretty much profusely, very impatient, said that  
22 she was here for an appointment for the President.  
23 I asked for her driver's license or Government ID,  
24 as I ask everybody for. She gave it to me, checked it in the  
25 WAVE system, the computer system. She was not in. I

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1 informed her that she needs to call a staff member to clear  
2 her in.  
3 And I can't remember. I may have called Betty  
4 Currie that day or not. Lots of times, if it's an  
5 appointment for the President, I take an extra step and call  
6 -- say, if it was for the President, I would call Betty and  
7 say, you know, "This person is not cleared in; could you  
8 please clear her in?"  
9 At which point, I remember, in my notes I made an  
10 annotation, "Monica is not cleared in again."  
11 Q This had happened before?  
12 A Yeah. It's kind of -- for us, it's kind of  
13 irritating, because it puts the pressure on us, because it's  
14 an appointment for the President. And when they're not in  
15 the system, it just -- you know, you want to get the  
16 presidential appointments in quick.  
17 Q Did she say she was there to see the President or  
18 Betty Currie?  
19 A She -- she was always there to see the President.  
20 Q Did she say that?  
21 A She said it the majority of the times she was  
22 there, especially earlier, prior to that, she would say that.  
23 Q When you were previously interviewed in May of  
24 1998, according to this report, on Page 3, the first  
25 paragraph, you said that Monica Lewinsky would always advise

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Page 19

1 that she was there to see the President, until the summer of  
2 1997, when Lewinsky advised that she was there to see Currie.  
3 Does that sound right to you?

4 A Correct.

5 Q Do you have any memory one way or the other  
6 whether, on the day that you're talking about last summer,  
7 she said she was there to see the President or Betty Currie?

8 A It would have been -- it would have been a 50/50  
9 chance.

10 Q But you considered her to be the President's  
11 appointment, based on your experience with her?

12 A Correct, because of the -- all the other times that  
13 she had come in.

14 Q So you said you wrote in your notes that Monica  
15 Lewinsky was not in the system again or was not cleared in  
16 again.

17 A Correct.

18 Q What did you do?

19 A Like I said, I May have called Betty and said, you  
20 know, whatever. Or Betty, lots of times, would call down to  
21 me and say, "Could you please let her in?"

22 And I don't know if it happened on this date or  
23 other dates, but the -- I mean, I can remember several  
24 conversations with Ms. Currie, that "I can break a lot of  
25 rules for you, but that's the one rule I can't break. I

1 Monday, July 14, 1997, as you sit here today?

2 A Correct.

3 Q Do you remember anything else about that day?

4 A Again, one of the two days, it was very hot. She  
5 came up. She didn't get in right away. She wasn't in the  
6 system. She kept fanning herself like this (indicating), you  
7 know.

8 Q Indicating with your hand waving at your face?

9 A Yeah. "I'm hot. Well, can't I just wait in your  
10 booth?" You never let somebody wait in your booth, because  
11 if they're an appointment, they're not allowed into the  
12 complex until they're cleared.

13 I remember, like I said, she was sweating. I mean,  
14 lots of sweat on her dress, down her back, in her -- this  
15 area (indicating).

16 Q Indicating your chest. Go ahead.

17 A Correct. Her hair, when a woman's hair, in high  
18 humidity -- it was frizzled. And she waited, I would guess,  
19 10, maybe 15 minutes in the heat.

20 And, by the time the appointment finally came up  
21 and was in the system, and she went up to see the President,  
22 or Betty, it looked like she went a couple rounds with  
23 Mohammed Ali or something. She just -- she looked terrible.  
24 But again, I mean, I was going by the regulations.

25 Q And, as you said, you don't remember whether that

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1 mean, they've got to be in the system before I can bring them  
2 into the complex."

3 Q Do you remember what day of the week July 14th was,  
4 1997?

5 A If I had to guess, I'd say it was a Monday. I had  
6 just -- I had come off of vacation.

7 Q Is that why you remember this incident in  
8 particular by date, because you had just come off of  
9 vacation?

10 A It was because of that and, last time when you  
11 questioned me, I looked at my notes right before I walked in.

12 Q So you took a note of that day?

13 A Correct.

14 Q Did you write your notes or just a notebook, or  
15 what?

16 A Your police notebook.

17 Q Do you recall whether you wrote anything else down,  
18 other than the fact that Monica Lewinsky was not cleared in  
19 again?

20 A No, that -- because that was my only problem with  
21 her, pretty much.

22 Q So there's a record in your notes of what date this  
23 was for certain, because you took those notes that day?

24 A Without a doubt, correct.

25 Q And, to the best of your memory, that date is

1 was July, the July visit or the August visit, in 1997, that  
2 was so hot?

3 A Correct. It could have been either.

4 Q Okay. Now, is there a particular reason why you  
5 remember August 16, 1997? Is that because there's a note of  
6 it in your record --

7 A Correct. There was --

8 Q -- or is there some other reason?

9 A As I remember the notes, both of them indicated  
10 that she was not cleared in the system again, meaning a  
11 problem for us.

12 On one of those occasions, you know, she's -- you  
13 know, she basically, like indirectly threatens you: "Do you  
14 know who I'm going to see?" You know, "What is he going to  
15 say if, you know, I'm late, and he's waiting for me?"

16 Q Did she say things like that to you?

17 A Yes, she would. And obviously, if somebody kind of  
18 makes a veiled threat like that, and the person who they're  
19 going to tell us the President of the United States, you take  
20 note of it.

21 Q Do you remember what day of the week the August  
22 visit was?

23 A I would guess a Saturday.

24 Q Okay. Do you remember anything with respect to the  
25 August 16, 1997 visit, with respect to Betty Currie and what

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1 she was wearing that day, or anything that happened that day  
2 with respect to her?

3 A Correct. Betty drove in her -- I believe she drove  
4 in her van that day. It looked like she was rushed, like she  
5 was just coming in. She was in a sweatsuit outfit. And  
6 normally, Betty is super professional, dressed to a tee -- I  
7 mean, the way she should. I mean. Saturdays, you didn't  
8 expect to see her in sweats.

9 She came in, just minutes before Monica had walked  
10 up. And, after her appointment was completed, where she went  
11 to Betty Currie's office, then what I'm assuming to be the  
12 President afterwards, when he came down to the -- from the  
13 residence, Betty left shortly, like right after -- right  
14 after they were gone.

15 Q Right after --

16 A Right after -- right after Monica completed her  
17 appointment, Betty was out of there, like the only reason she  
18 was there was for this appointment, to be there.

19 Q So you drew the conclusion that the only reason  
20 that Betty Currie was there was for Monica Lewinsky's  
21 appointment, because she arrived shortly before Monica  
22 arrived and left shortly after Monica left. Is that what  
23 you're telling us?

24 A I believe so, yes, ma'am.

25 Q Now, you mentioned that you were aware that the

1 probably the President's mistress, so treat her, you know,  
2 decent, but again, don't break the rules for her."

3 And, after she left our post and went up to the  
4 West Wing offices, I said: "And now watch. The President  
5 will come down within two minutes." And he still was  
6 incredulous that the President would have a mistress. And I  
7 said, "This is the way it normally happens. As soon as she  
8 comes in, within minutes, he comes down, because he's usually  
9 late."

10 Q When you say "he comes down," you mean from the  
11 residence?

12 A From the residence, or South Grounds, or wherever  
13 else he may be. He would come instantly, for this person.  
14 And the officer said, quote, "Well, I don't believe it." He  
15 says, "I'll give you ten minutes, and I betcha he still won't  
16 move," because it was -- you know, it was an early Saturday  
17 morning or something.

18 And I almost lost the bet. It was nine minutes and  
19 40 or 50 seconds before -- before he came down for that  
20 appointment.

21 Q Meaning the President?

22 A Correct.

23 Q Moved from the residence to the Oval Office?

24 A Correct.

25 Q And you were aware of that because of your radio?

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1 President moved to the Oval Office at some point, on August  
2 16, 1997?

3 A Yes, I am.

4 Q When did that occur in relation to when Monica  
5 Lewinsky arrived at the White House?

6 A One of those two days -- because I'm a senior  
7 officer in a section of 16 people, I usually train the  
8 officers. And I had new officer there, and I was --

9 Q This is on August 16th?

10 A On one of the two dates. It could have been the  
11 16th.

12 Q That summer, last summer?

13 A Correct. The officer's name was Myrick, as I  
14 remember.

15 Q M-y-r-i-c-k?

16 A Officer Myrick, M-y-r-i-c-k.

17 Q Do you know his first name or her first name?

18 A Robert. And it's a him.

19 Q Go ahead.

20 A And I had told him, as I had seen her coming up  
21 from the Ellipse, who she was, and I advised him to always go  
22 by the book: "Don't do any special favors, especially don't  
23 let her in unless she's cleared in, because someday this is  
24 going to come back on us, so always do it by the book."

25 I explained -- I basically said that, "This is

1 A Correct, ma'am.

2 Q Do you remember whether, on either of those summer  
3 occasions, Monica Lewinsky -- last summer, 1997 -- brought  
4 any gifts to the White House?

5 A Yes. On one of those occasions, she had a gift.  
6 It was gift-wrapped. It had a bow or something around it, to  
7 -- I remember, I didn't want to unwrap it, because it was for  
8 the President.

9 Q How did you know that?

10 A Well, policy is that --

11 Q How did you know it was for the President?

12 A Because she told me it was for the President.

13 Q Okay.

14 A Normally, you're supposed to have a TSD agent come  
15 down and personally inspect it.

16 Q TSP is a special --

17 A TSD.

18 Q TSD. What is that?

19 A Technical Services Division of the Secret Service.

20 Q And they would check this package for?

21 A Any gifts going to the President, they take a  
22 special interest in, and they like to check before it goes to  
23 him.

24 Q But they did not come? You did not request them?

25 A I didn't request them.

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1 Q Because?

2 A My attitude, as I said before, was: "Well, I know  
3 basically her status; I know where she goes. There hasn't  
4 been a problem in the past."

5 And If she was going to do any harm to the  
6 President, after I looked at the X-ray -- I did X-ray it, and  
7 there was nothing metal, connecting wires, or anything -- I  
8 said she would do the -- you know, it would be something  
9 along the lines of Lorena Bobbit, if she was going to hurt  
10 him, and that I couldn't stop. And that's what was going  
11 through my mind.

12 Q Was it one gift box or more than one gift box?

13 A It was one gift box. It was about the size of a  
14 man's cummerband, for like a tuxedo.

15 Q Can you show us with your hands about how big that  
16 would be?

17 A About the size of that? Sure. (Indicating.)

18 Q This folder?

19 A I would say a little bit longer. But, you know, if  
20 you take this (indicating) and squish it a little bit, a  
21 longer box.

22 Q For the record, you just picked up an 8-1/2-by-11  
23 folder. So a little longer and a little less wide?

24 A Correct. And it had very little weight. I  
25 believe, personally, it was this tie that you read about in

1 Q Douglas Draggotta?

2 A Correct. And he said that when this broke -- this  
3 broke on January 21st, I think, the Monica thing hit the  
4 papers.

5 Q 1998?

6 A And he said, "Hey, we just cleared her in, on like  
7 the 18th or something. She was just here last month." And I  
8 said, "I don't remember it." But they didn't remember the  
9 date, and I think they might have went back and looked at the  
10 dates that they worked and I didn't.

11 Q Did they have any specific record that they looked  
12 at that reflected the date that she was actually there, or  
13 did they look at a record that showed when they worked the  
14 Southwest Gate?

15 A Again, I don't know. I'm usually -- I'm pretty  
16 meticulous, sometimes. I keep notes. I don't think either  
17 of them really do.

18 Q Did they tell you whether Monica Lewinsky brought a  
19 package to the White House on December 28, 1997?

20 A I believe they did.

21 Q Did they tell you anything --

22 A Or Douglas did.

23 Q Did Douglas Draggotta tell you anything about that  
24 package?

25 A That's about it, that I remember. He said package

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1 the paper. I'm not sure. But it was -- it was light, and it  
2 had like no magnetic or metal signature in it. I mean, you  
3 could see right through the thing.

4 Q Are you aware of a visit by Monica Lewinsky to the  
5 White House in December 1997? Did you ever hear about that  
6 or were you present for that?

7 A Yes, I am. I checked my notes again, and I was not  
8 there that day. The President had given us one day off for  
9 Christmas. But, because of my holidays -- Friday, Saturday  
10 -- my day fell off on the 28th, my off day. And so I took  
11 it.

12 Q So you were off from December 28th to --

13 A I was off on the 28th, and two other officers on my  
14 post --

15 Q Which is the Southwest Gate?

16 A -- at the Southwest Gate were there.

17 Q And who were those officers?

18 A Officer Oliver Janey, J-a-n-e-y, and Officer  
19 Douglas Draggotta, D-r-a-g-g-o-t-t-a.

20 Q Did they, either one of them, tell you anything  
21 that happened on December 28, 1997?

22 A Just regular post conversation.

23 Q Let's start with this. Did either one of them tell  
24 you about this, of both of them, do you know?

25 A Correct. I think Doug told me about it. And --

1 or packages, one of the two.

2 Q Do you recall, in your experience, Monica Lewinsky  
3 visiting the White House on a day of particular significance  
4 to the President, such as, you know, a birthday or holiday or  
5 something like that, or anniversary? Do you remember  
6 anything like that?

7 A Correct. She had come, it seems like, on days that  
8 she would come, one of them particularly was kind of  
9 depressing, because I want to say it was the President and  
10 the First Lady's, either their anniversary or -- or something  
11 to that effect. And I just made a mental thought of that was  
12 not the way to celebrate a traditional family anniversary, in  
13 my opinion.

14 Q Did you make notes of every visit that she made,  
15 or --

16 A No. I specifically made notes of two times that I  
17 dealt with her specifically, because she just started, excuse  
18 my French, but pissing me off, because she would never -- she  
19 was -- she was a pain in the ass, coming in always.

20 Q Okay. And you took notes because you had problems  
21 with the fact that she was never cleared in the way that you  
22 felt she was supposed to be; is that right?

23 A Correct.

24 Q Okay.

25 A If something comes back and they say, "Well, how

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1 come she was held up," I could just go back to my notes and  
2 say, "Well, she was held up on such-and-such a date because  
3 she wasn't cleared, and no staff members cleared her in."

4 MS. WIRTH: Okay. All right. I'm going to ask you  
5 step out for a minute, officer. Thank you.

6 THE WITNESS: Yes, ma'am.

7 (Witness excused. Witness recalled.)

8 MS. WIRTH: Officer, you don't need to sit down.

9 Having no questions from the grand jury, with the forelady's  
10 permission, you are excused. Correct?

11 THE FOREPERSON: You are excused.

12 (The witness was excused.)

13 (Whereupon, at 3:55 p.m., the taking of the  
14 testimony in the presence of a full quorum of the Grand Jury  
15 was concluded.)

16 \* \* \* \* \*

- 1 -

## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 05/22/98

STEVEN PHILIP PAPE, white, male, date of birth [REDACTED], [REDACTED], United States Secret Service (USSS), Uniformed Division was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, NW, Washington, DC, 20004. Also present for the interview were Associate Independent Counsel (AIC) MARY ANNE WIRTH and AIC MICHAEL TRAVERS, Department of Justice (DOJ) attorneys DAVE ANDERSON and JANIS KESTENBAUM, and JOHN ROWLEY, an attorney representing PAPE. PAPE was interviewed under the terms of an agreement between DOJ and OIC. PAPE was apprised of the official identity of the interviewers and the nature of the interview and thereafter provided the following information:

PAPE has been employed by the USSS since January 7, 1991. PAPE was unassigned at the White House for the first four years of his career and thereafter was assigned to the Southwest gate. PAPE explained that he would work various assignments while unassigned, including the Control Center and the Waves Center.

PAPE advised that there are normally three officers assigned to the Southwest gate, which is also known as the B-4 post. PAPE stated that one officer is assigned to the South Grounds gate, which is just to the south and east of the Southwest gate. The South grounds gate is also known as the B-3 post. PAPE stated that two officers are in a blocking vehicle located on E street, to the south of the White House grounds. PAPE said that an additional two officers rotate among the aforementioned posts throughout the day.

PAPE said the officers assigned to the Southwest gate and related posts are divided into two sections, the B section and the C section. PAPE said the two sections alternate between working the 6:30 a.m. to 3:00 p.m. shift and the 3:00 p.m. to 11:00 p.m. shift. PAPE said his supervisor is Sergeant SAMMY ESCAMAILLA.

PAPE advised the first time he met MONICA LEWINSKY was on West Executive Drive, the avenue that runs between the White House and the Old Executive Office Building. LEWINSKY was either an intern or a White House passholder at the time and she asked PAPE about the President's schedule. PAPE told her to look in

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Investigation on 05/18/98 at Washington, DC File # 29D-OIC-LR-35063

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Continuation of OIC-302 of STEVEN PHILIP PAPE, On 05/18/98, Page 2

the newspaper. LEWINSKY responded with another question about the President going to Room 450 of the OEOB. PAPE then told LEWINSKY to ask the press.

Prior to meeting LEWINSKY on the occasion described above, PAPE had heard a rumor that LEWINSKY was hanging around the West Wing, trying to see the President. In addition, someone in the USSS told PAPE that they had seen LEWINSKY hovering around the East steps of the OEOB, waiting for the President to pass by.

PAPE does not recall another encounter with LEWINSKY while she worked at the White House.

PAPE advised that he heard other rumors about LEWINSKY. PAPE heard that LEWINSKY was infatuated with the President and that she spent a lot of time trying to see the President. PAPE heard that LEWINSKY was caught in the family theater of the White House with the President. PAPE heard this was the reason LEWINSKY and [REDACTED] were transferred.

PAPE never heard about LEWINSKY's job performance. Around the time [REDACTED] was transferred, PAPE heard a rumor that [REDACTED] was transferred. PAPE looked [REDACTED] photograph up on the computer, to make sure he could identify her if she tried to gain access into the White House complex. PAPE heard [REDACTED] termination was not on good terms.

Eventually, PAPE was formally notified of [REDACTED] being transferred. PAPE advised this notification usually takes the form of a memorandum or an e-mail. PAPE advised it is not common practice to notify the USSS of every employee who leaves employ at the White House. However, USSS is notified of those employees who leave on unfavorable terms.

PAPE is not sure if he received formal notification of LEWINSKY's transfer. PAPE advised that he heard rumors that something was going on between LEWINSKY and the President. PAPE also heard that LEWINSKY was a stalker and that she hung out too much near the West Wing.

After LEWINSKY was transferred, PAPE heard various rumors about her. PAPE heard stories about LEWINSKY coming to see the President after she was transferred. PAPE then saw LEWINSKY on numerous occasions at the Southwest gate. PAPE can only recall three specific occasions, but believes there were more. PAPE advised LEWINSKY typically would come to the Southwest gate, show her identification and go into the White

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Continuation of OIC-302 of STEVEN PHILIP PAPE . On 05/18/98 , Page 3

House after PAPE would make sure LEWINSKY had an appointment.

PAPE advised that LEWINSKY would always advise she was there to see the President, until the Summer of 1997, after which LEWINSKY advised she was there to see CURRIE. PAPE advised that when he checked the Waves system to ensure LEWINSKY had an appointment, the system would show that LEWINSKY's appointment was made by CURRIE, and that LEWINSKY was there to see either CURRIE or the President.

PAPE advised he would typically call the E-1 post, the next post a visitor to the West Wing would see, to advise LEWINSKY was on her way. In addition, PAPE would sometimes call CURRIE to advise LEWINSKY was on her way. PAPE does not recall ever being notified by CURRIE that LEWINSKY was on her way to the White House.

PAPE heard from Officer SCOTT LEWIS that LEWINSKY came to the Southwest gate during the midnight shift, which is between 11:30 p.m. and 6:30 a.m.. LEWIS said that this incident occurred after LEWINSKY left employ and that LEWINSKY came into the White House carrying a rose.

One of LEWINSKY's visits PAPE recalls specifically occurred on July 14, 1997. PAPE recalls it was a Monday and PAPE was just coming off of leave. LEWINSKY came to the gate and asked if she was cleared in to see CURRIE or the President. When PAPE said no, LEWINSKY asked if he was sure and told him to check the Northwest gate. PAPE did and informed LEWINSKY she was not scheduled for a visit. After several minutes, LEWINSKY was cleared in to the White House.

PAPE recalls occasions when he called CURRIE regarding LEWINSKY not being entered into the Waves system. On a couple of occasions, CURRIE called PAPE to ask whether LEWINSKY could be cleared in quickly or without going through the ordinary process of scheduling through the Waves system, or to schedule through the Waves system after LEWINSKY was already in the White House. PAPE refused to honor those requests since LEWINSKY was not considered a "VIP." PAPE inferred from CURRIE's tone, or her sigh, that CURRIE did not want to clear LEWINSKY in.

PAPE recalls another specific occasion LEWINSKY was cleared in to the White House occurring approximately thirty or thirty-two days after the July 14, 1997 incident. PAPE recalls clearing LEWINSKY in on a Saturday, around August 16. PAPE advised that CURRIE came to the White House in a jogging suit,

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Continuation of OIC-302 of STEVEN PHILIP PAPE, On 05/18/98, Page 4

which was not her typical meticulous dress. Five minutes after CURRIE arrived, LEWINSKY showed up at the Southwest gate. LEWINSKY did not have a previously scheduled appointment, but she was scheduled soon thereafter to see CURRIE. Within minutes of LEWINSKY gaining access to the White House, PAPE heard on his radio that the President moved from the White House residence to the West Wing. PAPE advised that CURRIE left the White House five minutes after LEWINSKY did.

PAPE advised he would see LEWINSKY exit the White House on some occasions, on others he would not.

PAPE recalls one occasion, which could have been a weekend, when he was training new Officers at the B-4 post when he saw LEWINSKY approaching the gate. PAPE told his trainees to watch how he handled the situation, because it was "by the book." PAPE may have also told the trainees to be careful around LEWINSKY, since she was the President's mistress.

PAPE advised this incident occurred on a very hot summer day. PAPE stated LEWINSKY was wearing a blue dress with white polka-dots. PAPE advised that officer MYRICK was assigned to the gate with PAPE. LEWINSKY was told to call whomever she was to meet. LEWINSKY advised she was having trouble getting in touch with anyone.

LEWINSKY had a package she said was intended for the President. PAPE described the package as a gift-wrapped box, a size large enough to contain a man's cummerbund. PAPE advised LEWINSKY asked to sit in the air-conditioned booth, because it was so hot outside. LEWINSKY was not allowed to sit in the officer's booth, but she eventually gained access to the complex.

PAPE advised he x-rayed the package, but did not have it inspected by the Technical Support Division, as he normally would. PAPE explained because LEWINSKY was the President's mistress, he did not want to treat her poorly or make her wait any more than was necessary, since it could come back on him. PAPE also stated that what was in the box would not hurt the President. If LEWINSKY wanted to hurt the President, she would do what LORENA BOBBITT did.

PAPE stated that by the time LEWINSKY got into the complex, she had sweat stains on her dress, her make-up was smeared and her hair was all frizzy. PAPE advised that LEWINSKY was wearing a lot of perfume. Once LEWINSKY left their presence, PAPE bet MYRICK that the President would move to the Oval office

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Continuation of OIC-302 of STEVEN PHILIP PAPE, On 05/18/98, Page 5

within ten minutes. PAPE won the bet when the President moved to the Oval Office approximately nine minutes and fifty seconds after LEWINSKY arrived.

PAPE heard that it was harder for LEWINSKY to get cleared into the White House after the Summer of 1997.

PAPE was told that on approximately December 29, 1997, LEWINSKY came to the White House with a package. Officers OLIVER JANNEY and DOUGLAS DRAGOTTA were on duty at the time. JANNEY processed LEWINSKY. PAPE assumed she was there to see the President.

PAPE never saw LEWINSKY away from the White House.

PAPE recalls one incident when LEWINSKY came to the Southwest gate while PAPE was in the back of the booth and Officer GREG LADOW was the primary officer in the booth. LEWINSKY was cleared in as a "press person," and PAPE thinks she was there to see MIKE McCURRY. PAPE advised press personnel do not normally come through the Waves system. PAPE thinks LEWINSKY had trouble getting an appointment with anyone else.

At one point, LADOW told PAPE that he thought LEWINSKY was a threat and LADOW wanted to put LEWINSKY on a "do not admit" list. PAPE explained that the USSS's job is to protect the President's physical safety as well as his public image. The do not admit list has been used for BILLY DALE of the White House Travel office, and for former Federal Bureau of Investigation (FBI) Special Agent GARY HARLOW. PAPE advised the rumors about LEWINSKY and the President were becoming more widespread at the time LADOW made the suggestion.

LADOW went to Lieutenant DAVE WOLTZ, the watch commander, to try to restrict LEWINSKY's visits. WOLTZ said that it was none of the USSS's business who the President saw. WOLTZ added that no one was going to find out about LEWINSKY anyway.

At about the same time, PAPE was told by GARY BYRNE that BYRNE was going to go to someone about LEWINSKY. PAPE advised that PAPE heard a rumor that BYRNE spoke to EVELYN LIEBERMAN about LEWINSKY.

PAPE advised that whenever he cleared LEWINSKY into the White House, the President would always move to the Oval Office, if he was not already there, shortly after LEWINSKY's entry. Because of this pattern, each time LEWINSKY came through the

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Continuation of OIC-302 of STEVEN PHILIP PAPE, On 05/18/98, Page 6

Southwest gate, PAPE would call the Control Center to advise LEWINSKY had arrived. PAPE stated that he would tell the Control Center that, because LEWINSKY had arrived, the Emergency Response Team should prepare for the President to move from the Residence to the Oval Office.

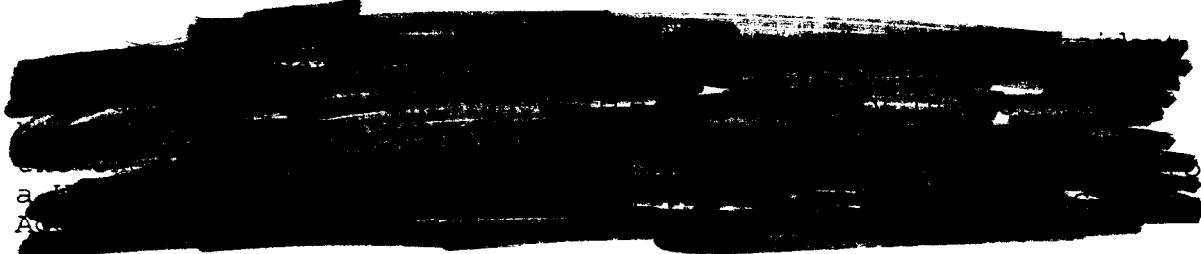
PAPE does not recall seeing LEWINSKY escorted by anyone from the White House Counsel's Office.

PAPE heard a rumor about LEWINSKY coming to the Northwest gate when BRYAN HALL was on duty. PAPE heard that LEWINSKY was told she would have to wait at the Northwest gate because another woman was in the Oval Office with the President. PAPE advised that once LEWINSKY gained access to the White House, she crossed paths with the other woman.

PAPE advised he heard, as a part of this rumor, that Sergeant WILLIAMS and Captain PURDIE are the other names associated with this incident. PAPE also heard that CURRIE was upset over what was said and the fact that someone would tell an outsider what was occurring on the inside of the White House. PAPE said CURRIE was the gatekeeper for the President.

PAPE advised he asked BRYAN HALL about this incident approximately two weeks after it was supposed to have occurred and HALL denied it ever happened. PAPE felt HALL was being truthful. PAPE is not aware of any disciplinary action taken as a result of the Northwest gate incident.

PAPE heard a rumor that LEWINSKY was in the Oval Office and was seen by NANCY HERNREICH. PAPE heard that Officer JOHN MUSKETT was on duty at the E-6 post at the time. HERNREICH got upset and told the Chief of Staff, LEON PANETTA, or the Deputy Chief of Staff, HAROLD ICKES. MUSKETT was then called by the USSS liaison with the White House staff, First Name Unknown (FNU) O'MALLEY. O'MALLEY called MUSKETT to his office to ask MUSKETT about the incident. MUSKETT asked O'MALLEY what else he was supposed to do in those circumstances.



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Continuation of OIC-302 of STEVEN PHILIP PAPE . On 05/18/98 . Page 7

PAPE recalls reading in Newsweek about LEWINSKY having couriers bring packages to the White House. PAPE recalls one occasion when CURRIE came to the Southwest gate to sign for a package that PAPE assumes was intended for the President. PAPE advised CURRIE would normally send an aide to retrieve packages.

PAPE recalls LEWINSKY visiting on a day of significance to the President, either his 50<sup>th</sup> birthday, his wedding anniversary or Mother's Day. PAPE recalled he thought it was ironic for LEWINSKY to visit on the day he had in mind.

PAPE recalls speaking to CURRIE approximately two to three times, but does not think CURRIE knows his name.

PAPE provided a hand drawn sketch of the Southwest gate area, a copy of which is attached. The original of the sketch was filed in an FD-340 with the Agent's original notes of the interview.



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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/30/98

RONALD O. PERELMAN, white male, born [REDACTED], home address [REDACTED], home telephone [REDACTED] employed as Chairman of the Board, MacAndrews & Forbes Holding Inc., 35 East 62nd Street, New York City, was interviewed in the office of his attorney, CHARLES A. STILLMAN of the firm of Stillman & Friedman, 425 Park Avenue, 21st Floor, New York City, telephone [REDACTED]. Also present during the interview was attorney JOHN B. HARRIS of the same firm.

After being advised of the personal and official identities of the interviewers and the purpose of the interview, PERELMAN provided the following information:

On about January 8, 1998, PERELMAN received a telephone call from VERNON JORDAN, a friend and member of the company's Board of Directors. The conversation was very low key and casual. During the conversation JORDAN mentioned that JORDAN had sent over an application of a terrific young girl and that she had met with JAYMIE DURNAN. JORDAN made no specific requests and did not request PERELMAN to intervene but PERELMAN volunteered to "look into it".

PERELMAN did not interpret the telephone call as a special request by JORDAN but rather that if PERELMAN could be helpful, JORDAN would like him to do so.

PERELMAN could not now recall if JORDAN even mentioned the girl's name. PERELMAN, at the time of the conversation with JORDAN, was not aware of a connection between MONICA LEWINSKY, President CLINTON and VERNON JORDAN, if any. PERELMAN assumed the girl was applying for a low-level job and didn't attach any particular significance to the telephone call.

PERELMAN contacted DURNAN to ask about the application and was told by DURNAN that the girl had already been interviewed. PERELMAN told DURNAN to see if they could be helpful.

PERELMAN recontacted JORDAN that same day and told JORDAN that DURNAN had been instructed to be helpful if DURNAN

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Investigation on 1/26/98 at New York City, NY File # 29D-LR-35063

by CI [REDACTED]  
CI [REDACTED] Date dictated 1/30/98

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Continuation of OIC-302 of RONALD O. PERELMAN, On 1/26/98, Page 2

could. JORDAN thanked PERELMAN and the conversation ended.

PERELMAN has had no contact with JORDAN or anyone else connected with the CLINTON administration since the above described telephone calls.

PERELMAN is not aware of any other recommendations made by JORDAN other than WEBSTER HUBBELL.

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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 4/2/98

RONALD PERELMAN, Chairman of the Board, MC ANDREWS & FORBES HOLDINGS (MFH), 35 East 62 Street, New York, New York, was interviewed at the law office of STILLMAN & FRIEDMAN, P.C., 425 Park Avenue, New York, New York. Present at the time of interview was his attorney CHARLES STILLMAN, JOHN HARRIS, also of STILLMAN & FRIEDMAN, as well as Assistant Independent Counsels THOMAS BIENERT and STEVEN BINHAK.

The offices of MFH on East 62 Street are located in a townhouse whose property is adjacent in the rear to a townhouse on East 63 Street which is PERELMAN's residence. The telephone number used by PERELMAN in his office is [REDACTED]. He has several additional lines for his use. When PERELMAN wants to contact VERNON JORDAN, he calls JORDAN's office number in Washington, D.C. He doubts that he has ever called JORDAN at his home or ever called JORDAN from his home. PERELMAN said he never places telephone calls himself. That is a job performed by his secretary.

PERELMAN is acquainted with VERNON JORDAN. JORDAN serves on the Board of Directors of THE REVLON GROUP, one of the corporate entities controlled by PERELMAN. He speaks to JORDAN approximately one time per month. He sees JORDAN four times per year at company board meetings in New York City. In addition, when JORDAN is in New York he sometimes stops by MFH, at which time PERELMAN may have casual conversations with him.

Prior to January 8, 1998, PERELMAN did not have any discussion with JORDAN regarding MONICA LEWINSKY and was unaware that MFH was involved with her in any way. PERELMAN said he went on vacation on or about December 18 or 19, 1997 for about two weeks. He was back at the office just after January 1, 1998.

On January 8, 1998, VERNON JORDAN called PERELMAN for the purpose of talking about MONICA LEWINSKY. There did not seem to be any other reason for the call. JORDAN told him that he had "sent a terrific young girl, very smart, for you guys to take a look at". He also described her as "very good". PERELMAN told him he would look into it. During this call, JORDAN also

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Investigation on 3/27/98 at New York, New York File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 4/2/98



29D-OIC-LR-35063

Continuation of OIC-302 of RONALD PERELMAN, On 3/27/98, Page 2

mentioned that JAYMIE DURNAN had already met with her. There was no mention of anyone else at MFH who had talked with LEWINSKY. JORDAN did not ask PERELMAN to take any specific action. JORDAN did not indicate what level position LEWINSKY was seeking or for which she was qualified.

After JORDAN's call, PERELMAN asked DURNAN to come to his office, at which time he told DURNAN about his conversation with JORDAN. DURNAN said that he had met with her recently, determined MFH had no position for her, and had forwarded her resume to REVLO. PERELMAN then said to DURNAN, "Let's see what we can do." DURNAN told him LEWINSKY was looking for a public relations job.

After speaking with DURNAN, he recalls having telephoned JORDAN to tell him he had spoken with DURNAN and they would do what they could. JORDAN did not indicate there was a time constraint in the effort to secure LEWINSKY employment.

PERELMAN did not document any contacts he had about LEWINSKY and did not make any notes.

PERELMAN had no further information about LEWINSKY until the news media started airing stories about the allegations of her relationship with President CLINTON.

PERELMAN had no recollection of personally receiving any other telephone calls from JORDAN in which he referred people for employment. He is aware that JORDAN sent WEBSTER HUBBELL to them for employment; however, JORDAN did not speak to him about the matter at the time.

On or about January 21, 1998, PERELMAN heard the news about the allegations of the connection between CLINTON and LEWINSKY. He recalled that RICHARD HALPERIN mentioned it to him upon arriving at the office. HALPERIN had made the connection between the person mentioned on the news and the woman with whom they spoke at JORDAN's recommendation.

Later, on the same day (January 21, 1998), PERELMAN learned that REVLO had made an offer of employment to LEWINSKY. A meeting was held at the offices of MFH on that morning to

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Continuation of OIC-302 of RONALD PERELMAN , On 3/27/98 , Page 3

discuss the matter. Attending the meeting were RICHARD HALPERIN, HOWARD GITTIS, BARRY SCHWARTZ, RONALD PERELMAN, and CHARLES STILLMAN, Attorney for MFH.

PERELMAN has not spoken or communicated with JORDAN since January 8, 1998. He has not had any conversation with anyone from the White House or anyone known to be representing the President.



---

Ronald Perelman, 4/23/98

OIC Deposition

Page 1 to Page 18

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CONDENSED TRANSCRIPT AND CONCORDANCE  
PREPARED BY:

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## Page 1

[1] [2] [3] IN RE: GRAND JURY INVESTIGATION [4] [5] [6] DEPOSITION of RONALD O. PERELMAN, held at [7] the offices of Messrs. Stillman, Friedman & Shaw, [8] 455 Park Avenue, New York, New York 10022, on [9] Thursday, April 23, 1998, commencing at (10:10) [10] o'clock a.m., before Annette Forbes, a Certified [11] Shorthand (Stenotype) Reporter and Notary Public [12] within and for the State of New York. [13] [14] [15] [16] [17] [18] [19] [20] [21] [22] [23] [24] [25]

## Page 4

[1] [2] that we only speak one at a time, because [3] otherwise she can't get it all down. [4] So what I will ask is, even when you [5] already know the answer to something, wait until I [6] finish my question before responding. I will do [7] my best not to talk over you. [8] A Yes. [9] Q The other thing is what we are doing [10] here is. I am assuming your attorney explained we [11] are basically replicating a grand jury appearance. [12] Do you understand that? [13] A Yes. [14] Q What we have done in order to make [15] life a little easier for you and your employees, [16] rather than requiring you to come down to [17] Washington and go into the grand jury, we are [18] going to do it in deposition format here in New [19] York. [20] Do you understand that? [21] A Yes. [22] Q But the grand jury rules apply. [23] Do you understand that? [24] A Yes. [25] Q First of all, this is a duly

## Page 2

[1] APPEARANCES: [2] OFFICE OF THE INDEPENDENT COUNSEL [3] 1001 Pennsylvania Avenue, N.W. [4] Suite 490 North [5] Washington, D.C. 20004 [6] BY: THOMAS H. BIENERT, JR., Associate [7] Independent Counsel [8] STEPHEN BINHAK, Associate Independent [9] Counsel [10] [11] [12] [13] [14] [15] [16] [17] [18] [19] [20] [21] [22] [23] [24] [25]

## Page 5

[1] [2] impaneled Federal Grand Jury that we are going to [3] be presenting your testimony to. [4] You understand that? [5] A Yes. [6] Q Because it's a Federal Grand Jury [7] looking into possible federal crimes, everything [8] that you say here is subject to the penalty of [9] perjury. [10] Do you understand that? [11] A Yes. [12] Q Do you understand that perjury is [13] the knowingly making of a materially false [14] statement. [15] Do you understand that? [16] A Yes. [17] Q Do you understand that that would [18] include failing to give information or saying that [19] you don't recall something when, in fact, you do? [20] A Yes. [21] Q Do you understand that if you were [22] to commit perjury, that that's a Federal crime and [23] it is punishable by a penalty of up to five years [24] in jail or a fine of up to \$250,000? [25] A Yes.

## Page 3

[1] [2] RONALD OWEN PERELMAN, called [3] as a witness, having first duly affirmed to [4] Annette Forbes, a Notary Public of the [5] State of New York, was examined and [6] testified as follows: [7] EXAMINATION [8] BY MR. BIENERT: [9] Q Mr. Perelman, thanks again for being [10] here. [11] My name is Tom Bienert and this is [12] Steve Binhak. You may recall that we met a few [13] weeks ago when we were here. [14] A Yes. [15] Q Let me go over a few things first so [16] we all understand the ground rules. [17] First of all, as you can see, we [18] have a court reporter here who is taking [19] everything down. The main thing is it's important [20] that you audibly articulate responses instead of [21] using gestures. [22] Do you understand that? [23] A Yes. [24] Q The second thing is because she has [25] to get everything down, let's try to make sure

## Page 6

[1] [2] Q Do you have any questions about [3] perjury? [4] A No. [5] Q You also have a couple of important [6] rights before the grand jury. [7] First, you have a Fifth Amendment [8] right not to incriminate yourself. [9] Do you understand that? [10] What that means is you have a right [11] to refuse to answer any question if you in good [12] faith believe the answer could subject you to [13] criminal punishment. [14] Do you understand that? [15] A Yes. [16] Q Do you understand that Fifth [17] Amendment right? [18] A Yes. [19] Q You also have a Sixth Amendment [20] right. [21] What that means is you are entitled [22] to counsel, but because in a grand jury type [23] setting counsel is not allowed here in the room, [24] your counsel could be outside, you are absolutely [25] free to consult with your counsel as you think

## Page 7

[1] appropriate during our proceeding here.  
 [2] Do you understand that?  
 [3] A Yes.  
 [4] Q You are represented by counsel  
 [5] today; is that correct?  
 [6] A Yes.  
 [7] Q That's Mr. Stillman?  
 [8] A Right.  
 [9] Q We are, in fact, in Mr. Stillman's  
 [10] law office?  
 [11] A Correct.  
 [12] Q Do you have any questions about your  
 [13] Sixth Amendment right?  
 [14] A No.  
 [15] Q The last thing is I am sure you have  
 [16] had your deposition taken before.  
 [17] Just to let you know one of the  
 [18] distinctions, because what we are using is a grand  
 [19] jury format, when I am done here, Ms. Forbes,  
 [20] appropriately named after your company, is going  
 [21] to make a transcript for us. You are not going to  
 [22] have an opportunity to review your transcript and  
 [23] make changes. We are going to keep the transcript  
 [24] and you may never even see it.  
 [25]

## Page 8

[1] Do you understand that?  
 [2] A Yes.  
 [3] Q Any questions before we get going?  
 [4] A No.  
 [5] Q Why don't you go ahead and tell us  
 [6] what your position is, give us in a general way -  
 [7] A I am chairman of the board of  
 [8] MacAndrews & Forbes, which is a holding company,  
 [9] and I am chief executive officer of that company.  
 [10] Q What is it that you do?  
 [11] A I basically monitor the operations  
 [12] of all our holdings, which are for the most part  
 [13] controlled pieces of consumer products operating  
 [14] companies.  
 [15] Q Do you know Vernon Jordan?  
 [16] A Yes.  
 [17] Q How do you know him?  
 [18] A He is a director of our company.  
 [19] Q Which company?  
 [20] A Revlon.  
 [21] Q How long has he been a director?  
 [22] A I think about 12 years.  
 [23] Q How often would you talk to Mr.  
 [24] Jordan as a general matter?  
 [25]

## Page 9

[1] A Irregularly. I would see him at the  
 [2] board meetings, which are like four times a year.  
 [3] Then occasionally he would pop into  
 [4] the office if he had some time while he is New  
 [5] York. Irregularly, maybe once a month, something  
 [6] like that, he would give me a call.  
 [7] Q Have you ever spoken to Mr. Jordan  
 [8] about a person named Monica Lewinsky or a person  
 [9] that you later learned was Monica Lewinsky?  
 [10] A Yes.  
 [11] Q How many times?  
 [12] A I spoke to him one time and I  
 [13] believe I called him back a second time.  
 [14] Q On the same day?  
 [15] A On the same day.  
 [16] Q That would be the only times that  
 [17] you would have spoken to Mr. Jordan about the  
 [18] person you learned was Monica Lewinsky, would have  
 [19] been on that one day?  
 [20] A Correct.  
 [21] Q Would that date have been somewhere  
 [22] around January 8th?  
 [23] A Yes.  
 [24] Q Why don't you describe for us as  
 [25]

## Page 10

[1] best you can what happened in terms of the first  
 [2] conversation that you had with him.  
 [3] A He called me in a very short, very  
 [4] light conversation, indicated that he had sent  
 [5] over to our shop the resume of this very bright,  
 [6] competent girl that he thought we should take a  
 [7] look at.  
 [8] Q What I am going to ask you to do,  
 [9] because actually this is what we did the last  
 [10] time, I have a quote here, if you could just take  
 [11] us as best you could through the conversation.  
 [12] A He said, "Hello, Mr. Chairman." He  
 [13] called me Mr. Chairman. He may have said how are  
 [14] you doing or something like that.  
 [15] Then he got right into, I have sent  
 [16] over this bright young girl, who I think is  
 [17] terrific, or something to that effect. I want to  
 [18] make sure somebody takes a look at her, something  
 [19] to that effect.  
 [20] Q Did he indicate to you that he knew  
 [21] that she had already seen any others at your  
 [22] office, for example, Jaymie Duman?  
 [23] A Yes. And I said I will take a look  
 [24] into it.  
 [25]

## Page 11

[1] He said, she has seen Jaymie Duman  
 [2] in your shop.  
 [3] Q This is Vernon Jordan telling you?  
 [4] A Yes.  
 [5] Q He made clear in that conversation  
 [6] that he was aware that she had interviewed with at  
 [7] least Jaymie Duman?  
 [8] A Yes.  
 [9] Q Was that the substance, as best you  
 [10] can recall, of the conversation?  
 [11] A The substance, yes.  
 [12] Q Was there anything else of a  
 [13] substantive nature that Vernon Jordan indicated  
 [14] that he wanted to speak to you about in that call,  
 [15] except for Monica Lewinsky?  
 [16] A No.  
 [17] Q Had Vernon Jordan ever, in the 12 or  
 [18] so years that you had known him on the Board of  
 [19] Directors of Revlon, had he ever called you to  
 [20] recommend anybody else to you?  
 [21] A Not that I recall.  
 [22] Q What, if anything, did you do after  
 [23] you got off the phone with Mr. Jordan that related  
 [24] to Ms. Lewinsky?  
 [25]

## Page 12

[1] A I called up Jaymie Duman and had  
 [2] him come to my office. And we repeated the phone  
 [3] conversation that I just had with Vernon to  
 [4] Jaymie.  
 [5] He said, "Yes, I already sent her  
 [6] over to Revlon."  
 [7] And I said, "Let's see if we can be  
 [8] helpful in this process."  
 [9] Q What, if anything, did Mr. Duman  
 [10] say?  
 [11] A He said, I met her, I think he said  
 [12] I met her. I sent her over to Revlon and I will  
 [13] just keep on top of it or something to that  
 [14] effect.  
 [15] Q What is Mr. Duman's position in the  
 [16] company?  
 [17] A He is special counsel to the  
 [18] chairman.  
 [19] Q Does he work under you?  
 [20] A Yes.  
 [21] Q Is there anybody in the company who  
 [22] doesn't work under you in terms of hierarchy? Are  
 [23] you kind of the head guy?  
 [24] A I'm the head guy.  
 [25]

## Page 13

[1] Q Or head person?  
 [2] A Head person.  
 [3] Q After you spoke with Mr. Durnan, did  
 [4] you do anything else in relation to Monica  
 [5] Lewinsky?  
 [6] A I believe that I called Vernon back  
 [7] and said to him, "I met with Jaymie and I told him  
 [8] to see if we can be helpful in this matter."  
 [9] Q What, if anything, did Mr. Jordan  
 [10] say to you?  
 [11] A Thanks. That would have been like a  
 [12] real quick conversation, 15, 20 seconds.  
 [13] Q That would have still been on the  
 [14] same day, the 8th?  
 [15] A I believe so. That's my  
 [16] recollection.  
 [17] Q After this conversation or series of  
 [18] conversations that you had on January 8th, when  
 [19] would be the next time that you heard anything  
 [20] that you realized was connected to Monica  
 [21] Lewinsky?  
 [22] A The day that this was all announced  
 [23] in the press.  
 [24] Q Does that sound like it would have  
 [25]

## Page 16

[1] you were talking to Mr. Jordan, when you were  
 [2] talking to Mr. Durnan or when you were talking to  
 [3] Mr. Gittis?  
 [4] A No.  
 [5] Q Have you had any communication of  
 [6] any form, either directly or indirectly, with  
 [7] Vernon Jordan about the Monica Lewinsky incident  
 [8] since your calls with him on January 8th?  
 [9] A No.  
 [10] Q Have you had any communication with  
 [11] anyone, President Clinton or anyone that you know  
 [12] to be his representative, in relation to the  
 [13] Monica Lewinsky incident?  
 [14] A No.  
 [15] Q Have you had any communication with  
 [16] Monica Lewinsky or any representative of hers?  
 [17] A No.  
 [18] MR. BIENERT: I think that's  
 [19] all I have.  
 [20] MR. BINHAK: I have nothing.  
 [21] (Whereupon, at 10:20 o'clock  
 [22] a.m., the deposition was concluded.)  
 [23]  
 [24]  
 [25]

## Page 14

[1] been around January 21st, somewhere around there?  
 [2] A Yes.  
 [3] Q Tell us about that.  
 [4] A I came into the office and somebody,  
 [5] I don't recall who, it may have been Howard  
 [6] Gittis, it may have been Richard Halperin, told me  
 [7] that the press had broken the story which unfolded  
 [8] as the Monica Lewinsky story, and the name didn't  
 [9] mean anything to me.  
 [10] And then they told me that this was  
 [11] the girl that Vernon had called about.  
 [12] Q At this time, were you aware as to  
 [13] whether or not your company, Revlon that is, had  
 [14] hired Ms. Lewinsky?  
 [15] A At that moment I'm not sure, but  
 [16] sometime during that morning, I did.  
 [17] Q What, if anything, happened next?  
 [18] A Howard Gittis then began meeting  
 [19] with our lawyers. Out of that came the press  
 [20] release and that was pretty much it.  
 [21] Q Other than being apprised of what  
 [22] was happening, were you involved in any of the  
 [23] actual meetings or actions that were taken about  
 [24] how to handle it, the fact that it was a public  
 [25]

## Page 17

[1] CERTIFICATE  
 [2] STATE OF NEW YORK )  
 [3] ) ss.  
 [4] COUNTY OF NEW YORK )  
 [5]  
 [6] I, ANNETTE FORBES, a Certified  
 [7] Shorthand (Stenotype) Reporter and  
 [8] Notary Public of the State of New  
 [9] York, do hereby certify that the  
 [10] foregoing Deposition, of the witness,  
 [11] RONALD O. PERELMAN, taken at the time  
 [12] and place aforesaid, is a true and  
 [13] correct transcription of my shorthand  
 [14] notes.  
 [15] I further certify that I am  
 [16] neither counsel for nor related to any  
 [17] party to said action, nor in any wise  
 [18] interested in the result or outcome  
 [19] thereof.  
 [20] IN WITNESS WHEREOF, I have  
 [21] hereunto set my hand this 28th day of  
 [22] April, 1998.  
 [23]  
 [24] ANNETTE FORBES, CSR, RPR  
 [25]

## Page 15

[1] story?  
 [2] A Not really.  
 [3] Q When you say not really --  
 [4] A Well, I knew what was going on. I  
 [5] knew we were going to issue a press release, but  
 [6] that was it.  
 [7] Q You didn't prepare the press  
 [8] release?  
 [9] A No.  
 [10] Q You didn't issue a press release?  
 [11] A No.  
 [12] Q You didn't set up another meeting  
 [13] where the decision was made about whether to do a  
 [14] press release or its contents?  
 [15] A No.  
 [16] Q Who was sort of your lead guy on  
 [17] that?  
 [18] A Gittis. I knew they were going to  
 [19] issue a press release.  
 [20] Q In other words, you were being kept  
 [21] informed?  
 [22] A To that extent, yes.  
 [23] Q Did you take any notes or write  
 [24] anything down about Monica Lewinsky, either when  
 [25]

## Page 18

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John Podesta, 2/5/98

Grand Jury

Page 2 to Page

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CONDENSED TRANSCRIPT AND CONCORDANCE  
PREPARED BY:

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## Page 2

(1) UNITED STATES DISTRICT COURT  
(2) FOR THE DISTRICT OF COLUMBIA  
(3) In re:  
(4) GRAND JURY PROCEEDINGS  
(5)  
(6) -x  
(7) Grand Jury Room No. 4  
(8) United States District Court  
(9) for the District of Columbia  
(10) 3rd and Constitution Ave., N.W.  
(11) Washington, D.C. 20001  
(12) Thursday, February 5, 1998  
(13) The testimony of JOHN D. PODESTA was taken in  
(14) the presence of a full quorum of Grand Jury 97-2, impaneled  
(15) on September 19, 1997, commencing at 3:32 p.m., before:  
(16) SOLOMON L. WISENBERG  
(17) BRUCE UDOLF  
(18) DAVID BARGER  
(19) PATRICK O'BRIEN  
(20) Associate Independent Counsel  
(21) Office of Independent Counsel  
(22) 1001 Pennsylvania Avenue, NW  
(23) Suite 490 North  
(24) Washington, D.C. 20004  
(25)

## Page 3

(1) PROCEEDINGS  
(2) Whereupon,  
(3) JOHN D. PODESTA  
(4) was called as a witness and, having been first duly sworn by  
(5) the Foreperson of the Grand Jury, was examined and testified  
(6) as follows:  
(7) EXAMINATION  
(8) BY MR. BARGER:  
(9) Q Good afternoon.  
(10) A Hi.  
(11) Q Could you please state your name and spell your  
(12) last name for the record.  
(13) A John D. for David, Podesta, P-o-d-e-s-t-a.  
(14) Q Mr. Podesta, you are here today pursuant to a grand  
(15) jury subpoena, correct?  
(16) A That is correct.  
(17) Q Mr. Podesta, let me go through with you a few  
(18) preliminary matters and then we will --  
(19) A Okay.  
(20) Q -- get to the questions. You are accompanied today  
(21) by an attorney, correct?  
(22) A That is right.  
(23) Q And is your attorney outside of the grand jury  
(24) room?  
(25) A Yes, he is.

## Page 4

(1) Q You understand that even though your attorney is  
(2) not allowed in the grand jury room you may consult with him  
(3) at any time, just provide reasonable notice to the grand jury  
(4) foreman -- forewoman, or ourselves.  
(5) Do you understand that?  
(6) A Yes, I do.  
(7) Q In addition, you, as with any witness, have a right  
(8) not to answer any question should a truthful answer provide  
(9) incriminating information against you.  
(10) Do you understand that?  
(11) A Yes, I do.  
(12) Q Now I mentioned the phrase, or the word witness,  
(13) let me advise you at this time you are not a target. You are  
(14) not a subject of this grand jury investigation. You are  
(15) viewed as a witness to provide information that may be  
(16) relevant to the grand jury investigation.  
(17) Do you understand that?  
(18) A Yes.  
(19) Q Now, even though you are viewed as a witness that  
(20) status, in theory, could change to -- to one of the  
(21) aforementioned subjects or targets.  
(22) Do you understand that?  
(23) A I do.  
(24) Q But you are not at this time a subject or a target.  
(25) A Yes.

## Page 5

(1) Q Now you also understand you have been placed und  
(2) oath?  
(3) A Yes.  
(4) Q And by being placed under oath, you have an  
(5) obligation to truthfully answer to the best of your knowledge  
(6) and belief the questions that will be put before you. Do you  
(7) understand that?  
(8) A Yes, I do.  
(9) Q And do you understand that a willful, or knowingly,  
(10) or intentionally wrong answer could subject you to possible  
(11) criminal violation, including things like perjury, or  
(12) obstruction of justice?  
(13) A I understand.  
(14) Q Thank you. Let me just briefly, for your benefit,  
(15) give you a little bit of information about the general  
(16) matters that the grand jury is investigating, to sort of give  
(17) you a frame of reference today.  
(18) This -- this is from a portion -- this portion is  
(19) from the United States Court of Appeals for the District of  
(20) Columbia, based on an application from the Office of The  
(21) Independent Counsel and the Attorney General.  
(22) "The Independent Counsel shall have jurisdiction  
(23) and authority to investigate to the maximum extent authorized  
(24) by the Independent Counsel Re-authorization Act, of 1994,  
(25) whether Monica Lewinsky, or others, suborned perjury,

## Page 6

(1) obstructed justice, intimidated witnesses, or otherwise  
(2) violated federal law, other than a Class B or C misdemeanor  
(3) or infraction, in dealing with witnesses, potential  
(4) witnesses, attorneys, or others concerning the civil case  
(5) Jones v. Clinton."  
(6) Do you understand, in general, what I just read to  
(7) you?  
(8) A Yes, I do.  
(9) Q Now if I could, briefly -- for the benefit of the  
(10) grand jurors, if you could briefly provide to us an outline  
(11) of your educational background. And I don't mean starting  
(12) with elementary school.  
(13) A Grade school (chuckling).  
(14) Q Yeah, let's say starting with college.  
(15) A I graduated from -- 1971 with a BA in Psychology,  
(16) from Knox College, which is in Galesburg, Illinois, which I  
(17) grew up in Chicago. And then I came to Washington and I went  
(18) to Georgetown University Law Center, where I received a JD  
(19) law degree in 1976.  
(20) Q After receiving your law degree, what did you do  
(21) next, with relation to employment?  
(22) A My first job out of law school was at the  
(23) Department of Justice. I was a Trial Attorney in the Land  
(24) and Natural Resources Division.  
(25) Q And how long were you there?

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(1) A Approximately 18 months.  
(2) Q So approximately from --  
(3) A I started in '76, and I left in, I think, January  
(4) of '78.  
(5) Q Thank you. And next after -- after the stint at  
(6) the Lands Division where did you go?  
(7) A I went to another federal agency, called The Action  
(8) Agency, which at the time ran VISTA and Peace Corps -- no  
(9) longer runs Peace Corps -- and Retired Senior Volunteer  
(10) Programs.  
(11) And I served there as a Special Assistant to the  
(12) Director of the agency.  
(13) Q Approximately -- as best you recollect,  
(14) approximately how long?  
(15) A I was there for probably 18 months again.  
(16) Q Okay.  
(17) A I don't remember precisely when I left.  
(18) Q That's fine. That is fine. And, generally, what  
(19) happened with regard to employment after -- after that  
(20) position?  
(21) A I then worked on Capitol Hill for some time, on the  
(22) Senate Judiciary Committee. I was a Counsel to -- to a  
(23) variety of Sub-Committees, both in the Majority and the  
(24) Minority side.  
(25) Democrats lost control -- I was on the Democratic

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(1) side, working originally for Senator John Culver, from Iowa.  
 (2) and then Senator Patrick Leahy, from Vermont.  
 (3) Q So, at that point in time, if they had lost control  
 (4) that would mean they are on -- it would be like a Minority  
 (5) Counsel?  
 (6) A I was Minority Counsel from --  
 (7) Q Okay.  
 (8) A -- 1981 to 1986, on the Senate Judiciary Committee.  
 (9) Q Okay. And then -- and then, what after that?  
 (10) A Then I moved to be the Chief Counsel of the Senate  
 (11) Committee on Agriculture.  
 (12) Q Approximately how long were you there?  
 (13) A Did that for, again, approximately 18 months.  
 (14) Q Okay. That would bring us to sometime around 1988?  
 (15) A Right.  
 (16) Q Approximately?  
 (17) A Right.  
 (18) Q All right.  
 (19) A I left -- I left the Senate in 1988, and began a  
 (20) business with my brother, the title of which was Podesta  
 (21) Associates.  
 (22) Q Generally, without -- you don't have to go into any  
 (23) great detail, I mean generally the nature of the business  
 (24) was?  
 (25) A We did public affairs work, mostly for non-profit

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(1) clients, and some lobbying for high-tech companies.  
 (2) Q And after --  
 (3) A Mostly for high-tech companies.  
 (4) Q I'm sorry. Is that -- is that -- and how long did  
 (5) you stay with that business?  
 (6) A From 1988 until 1993, when I joined the Clinton  
 (7) Administration.  
 (8) Q Now -- and I -- is that -- is -- the business you  
 (9) had with your brother, is that something you are allowed to  
 (10) maintain some type of interest in even after you -- after you  
 (11) went with the Clinton administration, or was that a full-time  
 (12) position that you now -- now you no longer have any business  
 (13) connection to?  
 (14) A I severed my relationship in 1993. I worked in the  
 (15) White House for two and a half years, until July 1, 1995. At  
 (16) that time I left the White House and took a position as an  
 (17) adjunct professor at Georgetown University Law Center.  
 (18) But while I was adjunct professor at Georgetown I  
 (19) did some consulting work for the business. So I re-  
 (20) associated myself with the business for -- and did a little  
 (21) bit of consulting work with them.  
 (22) Q I apologize. I mean -- that -- you left, at least  
 (23) work generally full-time with your brother in approximately  
 (24) '93?  
 (25) A January 20, '93.

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(1) Q And until about July of '95, during that period of  
 (2) time you were --  
 (3) A I was at the White House.  
 (4) Q And what position were you in, in the White House  
 (5) there?  
 (6) A I was the Staff Secretary.  
 (7) Q Can you briefly tell us what that means.  
 (8) A Yes. Since no one ever knows (chuckling) when you  
 (9) give the title. I, essentially, was what you might describe  
 (10) as the Executive Secretary in the White House. I managed the  
 (11) President's paper flow.  
 (12) So a paper that was being sent to the President  
 (13) would come through me, after the President acted on it it  
 (14) would come back through me.  
 (15) I manage all the official documents. I staff paper  
 (16) out, make sure that it was of the quality that ought to be  
 (17) going to the President. I summarize policy, memoranda for  
 (18) the President, and essentially kept the flow of paper.  
 (19) Which, as you can imagine, is quite extensive, going  
 (20) between -- you know -- through the staff to the President and  
 (21) back out to the staff.  
 (22) Q Okay. When you held -- when you held that  
 (23) position, who was your supervisor? Or, to whom did you  
 (24) answer?  
 (25) A I spent -- well --

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(1) Q If anybody.  
 (2) A It -- hopefully somebody (chuckling), it changed a  
 (3) little bit over time. I did answer directly to the  
 (4) President, but I was an assistant to the President, answering  
 (5) also to the Chief of Staff.  
 (6) At the beginning of the administration that was a  
 (7) person named Mac McLarty, who still is employed at the White  
 (8) House. Mac was the Chief of Staff until, I think, the summer  
 (9) of '94.  
 (10) Q And then Mr. Panetta came in?  
 (11) A At which point Mr. Panetta took over, and was --  
 (12) remained until -- Chief of Staff until I left in '95.  
 (13) Q Physically, where -- where -- I presume you had an  
 (14) office as Staff Secretary?  
 (15) A I did.  
 (16) Q Generally, can you describe for us where in the  
 (17) White House you -- you had an office, as Staff Secretary.  
 (18) A My office was in the West Wing, on the ground  
 (19) floor. To give you some sense of that, the Oval Office is on  
 (20) the first floor of the White House.  
 (21) Q Okay.  
 (22) A And so I was in -- I was in what we at least  
 (23) euphemistically called the ground floor, sometimes referred  
 (24) to as the basement. And -- but the way the building is built  
 (25) it is windowed on the ground floor as well.

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(1) Q Let me show you, as a reference, a diagram --  
 (2) A Uh-huh.  
 (3) Q -- or at least a schematic of, I believe what is --  
 (4) A This is the first floor of the White House.  
 (5) Q -- the first floor?  
 (6) A Correct.  
 (7) Q So your office would not be represented on this  
 (8) particular diagram?  
 (9) A That is correct. It would be --  
 (10) Q When you were Staff Secretary --  
 (11) A -- in essence -- when I was Staff Secretary it  
 (12) would be, in essence, under room 116 (indicating). When I  
 (13) say under it, it would be a floor below 116.  
 (14) Q Okay.  
 (15) A In that area back there.  
 (16) Q And you left that position in approximately July of  
 (17) '95, to become an adjunct professor with Georgetown Law, and  
 (18) you main -- and you also -- what is the word I'm looking  
 (19) for -- re-developed your business relationship with your  
 (20) brother?  
 (21) A That is correct, I did. As I say, I did a little  
 (22) bit of part-time consulting, which was allowed under my  
 (23) relationship with the law school.  
 (24) Q Did there come a time when you went back to the  
 (25) White House, as -- as an employee?

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(1) A Yes.  
 (2) Q Approximately when was that?  
 (3) A January of '97.  
 (4) Q And what position did you take at that time?  
 (5) A Deputy Chief of Staff.  
 (6) Q And who is the current Chief of Staff?  
 (7) A Erskine Bowles.  
 (8) Q Perhaps a dumb question, but as the Deputy, I take  
 (9) it you then answer to Mr. Bowles?  
 (10) A I do.  
 (11) Q Okay. Where is your office physically now, as a  
 (12) Deputy Chief of Staff?  
 (13) A I am in Room 108.  
 (14) Q Okay.  
 (15) A On this map (indicating). I didn't know it had a  
 (16) number.  
 (17) MR. WISENBERG: Would you mind putting your  
 (18) initials in that block where --  
 (19) THE WITNESS: Sure. (Witness complied.)  
 (20) A (Examining document.) I just want to make sure I'm  
 (21) reading the number.  
 (22) Q Yeah.  
 (23) A I'm in 108.  
 (24) MR. WISENBERG: And let the record reflect that I  
 (25) am marking this map as --

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[1] MR. BARGER: Use the middle initial --  
 [2] MR. WISENBERG: What is your middle initial?  
 [3] THE WITNESS: D.  
 [4] MR. WISENBERG: JDP-1. And have I so marked it?  
 [5] THE WITNESS: You have.  
 [6] BY MR. BARGER:  
 [7] Q Can you tell the members of the grand jury, as a  
 [8] Deputy Chief of Staff, generally what your duties entail.  
 [9] A Sure. It -- it may be helpful to note there are  
 [10] two of us. There are two Deputies who function with the  
 [11] Chief of Staff.  
 [12] Q The other is?  
 [13] A Sylvia Matthews. And the two of us sort of support  
 [14] the Chief of Staff, and we kind of divide the  
 [15] responsibilities of all of the other White House offices.  
 [16] Generally, the units of the White House are run by a person  
 [17] who would be an Assistant to the President.  
 [18] So, the National Economic Council is a domestic  
 [19] policy council, so essentially what it has in it is an  
 [20] Assistant to the President, that would operate that unit.  
 [21] Sylvia and I divide responsibility across the  
 [22] entire White House. We have some areas of specialization,  
 [23] but the three of us really share a lot of work. We do policy  
 [24] development, work on communication strategy.  
 [25] One of the two of us deputies generally travels

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[1] with the President when he is going out of town, especially  
 [2] on an extended trip. We kind of manage the internal offices  
 [3] of the White House. The -- we share responsibility, although  
 [4] I have a -- I probably spend a little more time at it for  
 [5] Management Administration. The personnel office largely  
 [6] reports to me.  
 [7] The -- I do more national security, she does more  
 [8] economic policy. She was Secretary Rubin's Chief of Staff at  
 [9] the Treasury Department, so she has got more of an economic  
 [10] background.  
 [11] We both work on a lot of policy development. We  
 [12] both worked a lot on the budget, on the State of the Union,  
 [13] et cetera. And we manage individual projects as they come  
 [14] along, big and small.  
 [15] Q From your -- from your perspective, and don't be  
 [16] modest, can you explain to us how it was you came to come  
 [17] back as Deputy Chief of Staff. I mean, what is your  
 [18] understanding? Is that something -- a position that you  
 [19] sought out, was it a position --  
 [20] A No.  
 [21] Q -- that you were requested to come back and do?  
 [22] Was it --  
 [23] A The latter.  
 [24] Q Okay.  
 [25] A My wife is asking me why, right now (chuckling.)

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[1] Q All right.  
 [2] A I had gotten to know Mr. Bowles, who served as  
 [3] Deputy Chief of Staff during -- he originally began in the  
 [4] Clinton administration as the Director of the Small Business  
 [5] Administration. At some point, I can't tell you exactly  
 [6] when, he came over to the White House and he served as Deputy  
 [7] Chief of Staff.  
 [8] And he and I ended up having a kind of rapport, he  
 [9] liked my work, I worked with him quite a bit for -- we were  
 [10] just kind of sabbatical, I guess. So -- and he -- he knew  
 [11] that I had been able, as Staff Secretary, to work over a  
 [12] broad range of policy matters, that I had fairly substantial  
 [13] communications and political experience.  
 [14] And I think he was looking for someone that was  
 [15] someone that he could just be -- you know -- have a  
 [16] partnership with and -- and work with.  
 [17] Ms. Matthews and I have worked together also over  
 [18] the years, beginning in 1988. And so, I think he was putting  
 [19] together a team and thought that we would be -- you know,  
 [20] fill out each other's strengths and weaknesses.  
 [21] Q So, essentially, at Mr. Bowles' request?  
 [22] A Mr. Bowles --  
 [23] Q You came back?  
 [24] A -- called me.  
 [25] Q Right.

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[1] A Recruited me. I told him I was reluctant to go  
 [2] back, he convinced me that it was a good thing to do, and I  
 [3] went back.  
 [4] Q Let me -- let me shift topics to some more -- some  
 [5] specific details that sort of directly relate to your  
 [6] investigation.  
 [7] A Sure.  
 [8] Q During the course of your time you have been  
 [9] employed at the White House, either in your earlier position  
 [10] or in your current position, did you ever come to know or  
 [11] come in contact with the named individual in our mandate,  
 [12] Monica Lewinsky?  
 [13] A I -- I never knew her at the White House. I have  
 [14] met her really briefly one time. And that was more recently.  
 [15] Q I'm sorry. I apologize. You met her?  
 [16] A For a few seconds recently.  
 [17] Q And approximately when was that that you met her?  
 [18] A December of 1997.  
 [19] Q And can you tell us, where was that?  
 [20] A It was at the -- well, it was at the funeral of  
 [21] Betty Currie's brother, whose name is Teddy Williams. It was  
 [22] at the Metropolitan Baptist Church, in Washington. And  
 [23] Betty, who is an old friend of mine, brother died, her sister  
 [24] also died earlier this year -- you probably are aware of  
 [25] that, and we went -- I went up to the funeral service for her

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[1] brother.  
 [2] And the service was conducted. I -- I -- I guess  
 [3] it is --  
 [4] Q That's all right.  
 [5] A -- it is somewhat a long story. I expressed my  
 [6] condolences to her and her husband, Bob Currie -- who is also  
 [7] a friend of mine, we had worked together at the Action Agency  
 [8] 20 years ago -- and went to the service.  
 [9] At the end of the service we came out, signed a  
 [10] guest book, and I noticed Bob was standing by his car, the  
 [11] funeral procession -- if you will -- had lined up. Mr.  
 [12] Williams wasn't buried that day, because he was going to be  
 [13] buried at Arlington Cemetery, but they were moving on to a  
 [14] different site for a service. And Bob was standing on the  
 [15] street. I went up, I again expressed condolences.  
 [16] Betty was in their car, I think waiting for this  
 [17] motorcade to move on. She was talking to a woman leaning  
 [18] into the car. I went up, again expressed my condolences and  
 [19] tell her how sorry I was.  
 [20] I reached in, I gave her a hug, she said, "Do you  
 [21] know --" "Do you know each other?" I said, "No." And she  
 [22] said, "This is Monica Lewinsky." I said, "It's nice to meet  
 [23] you." She -- Ms. Lewinsky walked down the street, I then  
 [24] went back to my car and that -- that's the only occasion  
 [25] which I met her

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[1] Q Other than the brief exchange of greeting with Ms.  
 [2] Lewinsky, did you have any conversation with her?  
 [3] A No.  
 [4] Q And just for clarification, Ms. Currie was inside  
 [5] the car, and Ms. Lewinsky was the one standing outside?  
 [6] A Yeah, she was standing outside.  
 [7] Q Prior to meeting -- and I don't mean -- as you have  
 [8] described, that contact or that meeting with Ms. Lewinsky,  
 [9] had you ever seen her prior to that, to --  
 [10] A Not to --  
 [11] Q -- the best of your recollection?  
 [12] A Not to the best of my recollection.  
 [13] Q Had you ever spoken with her, as you knew, prior to  
 [14] that occasion, whether in person or on the phone?  
 [15] A No, not to my knowledge.  
 [16] Q Just to -- to sort of -- to sort of cover the  
 [17] parameters of this, as far as you recollect, have you ever  
 [18] seen Ms. Lewinsky in the White House?  
 [19] A Not to my -- I don't believe so. And -- and  
 [20] certainly not to recognize her. But, as I say, I saw her for  
 [21] 10 seconds, and until this story broke out in the press I  
 [22] didn't know what she looked like.  
 [23] Q It may be somewhat -- I don't mean to beat the  
 [24] horse totally to death, but some of the questions may also  
 [25] jog your recollection. And just to be, you know, sort of to

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[1] cover all of this, as far as you recall, you do not recall  
 [2] seeing her at any social functions at the White House, for  
 [3] example?  
 [4] A No.  
 [5] Q Signings, or radio addresses, or hand shakings, or  
 [6] -- you know -- leave takings where the President is going  
 [7] somewhere, that kind of thing? As far as you recall.  
 [8] A No. No, but I want to be clear, I didn't -- I  
 [9] wouldn't have recognized her. I didn't know what she looked  
 [10] like, I didn't know who she was. So -- so, I certainly  
 [11] didn't recognize her.  
 [12] Q Okay. As far as you recall prior -- even though  
 [13] you had not previously met her until Ms -- Ms. Currie's  
 [14] brother's funeral, do you recall ever having any  
 [15] conversations with anyone else about Monica Lewinsky?  
 [16] A Yes.  
 [17] Q With whom -- with whom -- with whom have you  
 [18] conversed about Monica Lewinsky?  
 [19] A That is an opened ended question at this point in  
 [20] time. (Chuckling.)  
 [21] Q As best you can --  
 [22] A Well, let me --  
 [23] Q Should I put a date on it?  
 [24] A Yes.  
 [25] Q All right. We will put some context on it.

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[1] A Okay.  
 [2] Q Prior to January 1st of this year, 1998 --  
 [3] A Okay.  
 [4] Q -- do you recall any conversations, or do you  
 [5] recall ever having conversations with anyone about Monica  
 [6] Lewinsky?  
 [7] A Yes.  
 [8] Q All right. And with whom, as best you recollect,  
 [9] were those conversations with?  
 [10] A I initially had a conversation which I can't place  
 [11] precisely, but I would say late in the spring or early in the  
 [12] summer, initially with Mr. Bowles. Mr. Bowles said to me  
 [13] that --  
 [14] Q This is 1997?  
 [15] A 1997. And again I can't -- I can't place the  
 [16] specific time frame on it --  
 [17] Q Okay.  
 [18] A -- but I would say it would be, you know, maybe May  
 [19] or June, something like that. Life goes on there, so it is  
 [20] all kind of a swish that swirls back out quickly. Mr. Bowles  
 [21] said to me that in a conversation he had with the President  
 [22] that Ms. Lewinsky's name had come up. That she was a friend  
 [23] of Ms. Currie's, that she had worked at the White House, and  
 [24] that she -- Ms. Currie had been in touch with her -- well,  
 [25] I'm forwarding to it -- I think that was a subsequent

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[1] conversation --  
 [2] Q Okay.  
 [3] A That she was a friend of Ms. Currie's, that she had  
 [4] worked in the White House, that she had been sent over to  
 [5] work in the Pentagon. That, she was unhappy that that had  
 [6] happened, and thought that she hadn't been treated fairly in  
 [7] that job move. And that could he look into it.  
 [8] Q And -- and he look into it, meaning Mr -- could Mr.  
 [9] Bowles look into it?  
 [10] A Yeah, could Mr. Bowles -- I mean, when -- in that  
 [11] context, I think.  
 [12] Q As you understood it?  
 [13] A As I understood it. I mean the -- this is not --  
 [14] the President will just often off-load things to Mr. Bowles.  
 [15] Q Sure.  
 [16] A Expecting that Mr. Bowles would divvy up that  
 [17] responsibility. So I don't know that that was -- I don't  
 [18] take that -- from that that was personally that Mr. Bowles  
 [19] would look into it, but --  
 [20] Q Oh, I understand.  
 [21] A -- there was this person there -- that he would,  
 [22] you know, look into the matter.  
 [23] Q From your perspective, the President had enough  
 [24] confidence in Mr. Bowles' discretion that, "Here is a task I  
 [25] would like you to take care of, however you feel, however you

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[1] feel it should be taken care of. Whether you do it or  
 [2] designate someone else to do it, or --  
 [3] A That is correct.  
 [4] Q -- look into this issue." Okay. As -- as you  
 [5] understood it from Mr. Bowles, this is a conversation that  
 [6] Mr. Bowles had directly with the President?  
 [7] A I believe so. That is my recollection.  
 [8] Q I -- I take it -- and just to -- and I will come  
 [9] back to this -- but I take it because Mr. Bowles was relating  
 [10] the conversation to you that he was telling you this because  
 [11] he wanted you to have some responsibility in looking into  
 [12] this?  
 [13] A I think he was sort of saying, "What should we do  
 [14] about this?"  
 [15] Q Okay.  
 [16] A And it was -- it was in the context of a  
 [17] conversation where we are -- he was -- we are going over four  
 [18] or five things and he said, "Here is one, what should we do  
 [19] about it?"  
 [20] Q Four or five things, meaning the conversation  
 [21] between you and Mr. Bowles?  
 [22] A Yeah.  
 [23] Q I'm not going to --  
 [24] A I -- I don't remember what it was, but every day,  
 [25] once or twice a day, we sit down and go over, you know,

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[1] whatever we need to attend to that day.  
 [2] Q Do you remember, was this a discussion you had with  
 [3] Mr. Bowles in the morning, or in the afternoon, or --  
 [4] A I don't remember.  
 [5] Q The other -- the other items that occurred in the  
 [6] course of that conversation, so that we might be able to put  
 [7] a time frame or a context on it, can you generally describe  
 [8] those -- without going into any specifics that might -- might  
 [9] be in matter -- be of matters that are not relevant to the  
 [10] grand jury -- if you understand --  
 [11] A Yes, I --  
 [12] Q -- in other words, I'm not trying to get into --  
 [13] A Yes, I understand.  
 [14] Q -- any national security issues --  
 [15] A Right.  
 [16] Q -- or things like that.  
 [17] A I understand. I -- I -- but my answer is that I  
 [18] can't really.  
 [19] Q Okay.  
 [20] A I mean, we were just -- I don't remember this as a  
 [21] separate conversation. It was just like, "What have we got  
 [22] to do today?"  
 [23] Q Okay.  
 [24] A You know, "Here's a tic."  
 [25] Q Okay --

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[1] BY MR. WISENBERG:  
 [2] Q Do you have any --  
 [3] A And so I don't remember what it was in the context  
 [4] of. But we do that every day, so there is, you know, a  
 [5] thousand items like that. I can't -- I can't pull it out of  
 [6] any particular conversation.  
 [7] Q Do you have anything in terms of notes, or diary,  
 [8] or calendar that might -- you might be able to look at and  
 [9] pinpoint when this conversation occurred, or even some action  
 [10] you might have taken a couple of weeks later that would --  
 [11] that would pinpoint when -- around when the first  
 [12] conversation occurred beyond, I think you said, spring or  
 [13] summer?  
 [14] A I -- I really can't. But I -- I have looked for  
 [15] notes, and -- you know, in response to your subpoena, and I  
 [16] have no notes or calendars --  
 [17] BY MR. BARGER:  
 [18] Q That actually --  
 [19] A -- in regard to that.  
 [20] Q I'm sorry. That actually reminds me, I don't  
 [21] recall --  
 [22] A Again, this was not a separate meeting on this  
 [23] matter.  
 [24] MR. WISENBERG: Right.  
 [25] A I was just in his office, we were going over a list

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[1] of things and this came up.  
 [2] Q The subpoena also asked you to produce documents.  
 [3] as I recollect?  
 [4] A Yeah. My subpoena?  
 [5] Q Correct, your subpoena.  
 [6] A Yes.  
 [7] Q And I take it --  
 [8] A My understanding was that -- I have no personal  
 [9] documents, I have, you know, a few White House documents that  
 [10] were relevant to the White House subpoena.  
 [11] Q And it is your understanding --  
 [12] A And my lawyer sent you a letter, somebody a letter,  
 [13] saying that the White House would produce the White House  
 [14] documents. And I have no personal knowledge of that.  
 [15] BY MR. WISENBERG:  
 [16] Q Did Mr. -- did Mr. Bowles express any concern about  
 [17] this request from the President?  
 [18] A No. It was just like, you know, here is a matter  
 [19] that has come to his attention. The assumption I had was --  
 [20] I think at the time was that because Ms. Currie's name was in  
 [21] the -- was in the conversation that Ms. Currie must have said  
 [22] something to the President, the President said something to  
 [23] Erskine, Erskine said something to me.  
 [24] And, you know, that this person thought that she  
 [25] had been treated unfairly.

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[1] Q Do you recall any other -- any other occasion where  
 [2] you received a message or assignment like this from Mr.  
 [3] Bowles involving somebody who was a friend of Ms. Currie, who  
 [4] felt she needed some help, or needed something looked into  
 [5] like that?  
 [6] A No. But -- but -- but the request wasn't uncommon,  
 [7] in that the President offloads a lot of stuff. He --  
 [8] everything from people he meets on a rope-line when he is out  
 [9] campaigning to -- to -- I always dread when he goes to  
 [10] Renaissance Weekend, because he comes back with a sheaf of  
 [11] papers, and cards, and special -- you know -- requests.  
 [12] And so -- and people will -- will raise things with  
 [13] him, and he will raise them with Mr. Bowles, so it didn't --  
 [14] it didn't strike me as out of the ordinary.  
 [15] MR. WISENBERG: Okay. I'm sorry. I'm done.  
 [16] BY MR. BARGER:  
 [17] Q At the time it did not -- it was not an unusual  
 [18] request, I take it?  
 [19] A That is correct.  
 [20] Q And just to follow up on what Mr. Wisenberg was  
 [21] asking, is -- to the best of your recollection, had -- had  
 [22] the President -- or has the President or Mr. Bowles ever  
 [23] asked you to look into any other former employees -- former  
 [24] employee at the White House who had left the White House and  
 [25] was unhappy about having to leave?

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[1] In other words, is this the only sort of sour  
 [2] grapes employee that you have been asked to look into, as  
 [3] best you recall?  
 [4] A I've had certainly similar cases. I can't think of  
 [5] anything that is exactly the same.  
 [6] Q Okay.  
 [7] A But I have had -- he has asked me to look in  
 [8] everything from one who was the father of one of Chelsea's  
 [9] classmates at -- in high school, who when Ron Brown was  
 [10] killed and Bill Daley became Secretary of Commerce he reduced  
 [11] the number of political appointees and this guy lost his job,  
 [12] and said, "Go help him."  
 [13] So it wasn't -- I mean, it wasn't -- I mean this  
 [14] stuff comes around in all different directions.  
 [15] Q I'm sorry --  
 [16] A He is President, says, "Take care of these people."  
 [17] If somebody -- if it comes to his attention he usually will  
 [18] just pass it along. So -- and there -- he -- I get lots of  
 [19] personnel inquiries from the press.  
 [20] Q Okay.  
 [21] A But I -- but if you are asking me a former White  
 [22] House employee, who, blah, blah, blah, I can't think of  
 [23] anything --  
 [24] Q Okay.  
 [25] A -- that is directly the same. But it didn't -- it

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[1] wasn't, as I say, out of the ordinary.  
 [2] Q And I understand it may not have been unusual at  
 [3] the time or even -- even thereafter, but, obviously, in light  
 [4] of the inquiry now it takes on -- would it be fair to say it  
 [5] takes on some new significance, possibly -- possible new  
 [6] significance?  
 [7] A Probably --  
 [8] Q Fair enough. Now --  
 [9] BY MR. O'BRIEN:  
 [10] Q Sir, my name is Pat O'Brien, I am another Associate  
 [11] Independent Counsel. You said in your conversation with Mr.  
 [12] Bowles that he mentioned that Ms. Lewinsky was a friend of  
 [13] Betty, she had worked in the White House, and had been sent  
 [14] to work at the Pentagon?  
 [15] A Right.  
 [16] Q Did he -- did he talk about why she had been sent  
 [17] to the Pentagon?  
 [18] A I don't believe I learned that in that  
 [19] conversation.  
 [20] Q Okay. Did you later learn why she had been --  
 [21] I --  
 [22] Q -- sent to the Pentagon?  
 [23] A I said to Mr. Bowles, "Why don't I follow up with  
 [24] Betty on this?"  
 [25] Q Okay. And right now we will just stick with your

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[1] first conversation with Mr. Bowles.  
 [2] A Okay.  
 [3] Q You also mentioned that -- I think in that  
 [4] conversation -- Mr. Bowles indicated that she wasn't happy  
 [5] and didn't feel like she had been treated fairly; is that  
 [6] correct?  
 [7] A That is correct. That is my recollection.  
 [8] Q Right.  
 [9] A Of a -- of a one-minute conversation that occurred  
 [10] eight months ago.  
 [11] Q Right. Did -- during that conversation was there  
 [12] any -- did you have any understanding as to why she felt she  
 [13] hadn't been treated fairly?  
 [14] A No. But I had -- I got the information that Betty  
 [15] knew what was going on, and --  
 [16] Q Okay. You learned later?  
 [17] A I did learn later.  
 [18] Q The basis for this?  
 [19] A Right.  
 [20] MR. O'BRIEN: Okay. There you are.  
 [21] BY MR. BARGER:  
 [22] Q Sir, the basis for her feelings of being unhappy?  
 [23] A Right.  
 [24] Q But at the time -- at the time did you have any  
 [25] perception from Mr. Bowles as to why she was unhappy about

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[1] the job move?  
 [2] A No, other -- only that she had been treated  
 [3] unfairly in being moved out of the White House.  
 [4] Q Okay. And I guess -- and that -- and I didn't ask  
 [5] my question very well. From the way -- from what you have  
 [6] just testified to, that suggests that basically she was  
 [7] forced to leave, or asked to leave, or didn't want to leave  
 [8] the White House? Is that --  
 [9] A Well --  
 [10] Q Is that how you understood it, or not?  
 [11] A I didn't really -- I mean, we are making much out  
 [12] of a one minute conversation.  
 [13] Q Okay.  
 [14] A I learned a little bit more when I followed up on  
 [15] it. But I think that at the time I don't think there was any  
 [16] real texture to this.  
 [17] Q Okay.  
 [18] A Other than she was unhappy she had left the White  
 [19] House, "Could you follow up on it?"  
 [20] Q Okay. And you alluded to that you did follow up.  
 [21] Can you take us through what happened next with relation to  
 [22] the request made by Mr. Bowles? And what did you do to  
 [23] follow up, what did you find out, from whom, et cetera.  
 [24] A I talked to Ms. Currie.  
 [25] Q And what did she say?

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[1] A She said that Ms. Lewinsky -- she had befriended  
 [2] Ms. Lewinsky, she was a friend of her's, that she was -- had  
 [3] worked in the White House. I -- I -- again, I've learned a  
 [4] lot in the last couple of weeks, and it is hard to keep all  
 [5] of this separate.  
 [6] Q Okay. Can you --  
 [7] A But I think what she said to me at the time -- I  
 [8] think she said to me that she had worked in the East Wing,  
 [9] which given -- I think that is probably right -- she worked  
 [10] in the East Wing, that she was a good kid, you know a good  
 [11] young woman, good worker, she had become friends with Betty  
 [12] during the course of her employment there, she had come to  
 [13] visit her.  
 [14] That, Ms. Lieberman had decided that she was  
 [15] spending too much time in the West Wing, and had moved her  
 [16] off the -- out of the White House, and found her a job in the  
 [17] Pentagon. And that she felt, you know, that she had been --  
 [18] you know, sent across the river -- if you will, and she felt  
 [19] badly about that.  
 [20] And that she felt like she hadn't done anything  
 [21] wrong, and that she had to pay the consequence for it.  
 [22] Q Across the river is a euphemism, that sometimes  
 [23] refers to the Potomac, right?  
 [24] A I was talking about the Pentagon.  
 [25] Q Now you -- you alluded to the fact that you have

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[1] learned things recently. I take it from -- I take it that  
 [2] you just testified to, as best you are able to --  
 [3] A That is my best recollection of that conversation.  
 [4] Q -- of what you knew then, as opposed to what you  
 [5] know now?  
 [6] A That is correct.  
 [7] Q Okay. Do you recall when it was you talked to Ms.  
 [8] Currie after Mr. Bowles asked you to look into it?  
 [9] A Soon. Soon thereafter.  
 [10] Q Was it --  
 [11] A I don't know if it was the same day, or the next  
 [12] day, but soon after.  
 [13] Q Within a few days, is it fair to say?  
 [14] A Yeah, absolutely.  
 [15] Q Do you recall where it was you talked to Ms.  
 [16] Currie? Was it at the White House, on the job, for example,  
 [17] as opposed to calling her at home, or --  
 [18] A Yes. I think it was in my office.  
 [19] Q Now you earlier stated that you didn't believe you  
 [20] had any personal notes called for by the subpoena. In the  
 [21] course of looking for documents do you -- do you know whether  
 [22] there are White House documents that relate to this topic and  
 [23] what you have testified to?  
 [24] A White House documents that would be in my  
 [25] possession?

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[1] Q Well, even if they are not in your possession --  
 [2] A I mean, I don't have any documents.  
 [3] Q Yes, but are you aware --  
 [4] A Right.  
 [5] Q -- that such documents --  
 [6] A I don't have any notes but --  
 [7] Q -- exist?  
 [8] A No. I'm unaware of whether anybody else has any  
 [9] documents though. I looked through my records in the White  
 [10] House. I have a few things -- nothing related to this  
 [11] conversation -- I provided to the White House Counsel, that  
 [12] were within the scope of this.  
 [13] Q As you understood it from Ms. Currie, was it Ms.  
 [14] Lieberman's decision to have Ms or Miss Lewinsky moved out of  
 [15] the White House?  
 [16] A That is what Ms. Currie told me.  
 [17] Q Okay. What happened next, if anything, with regard  
 [18] to looking into the matter? After you talked to Ms. Currie.  
 [19] A Really, what --  
 [20] Q Or -- I'm sorry. Go ahead.  
 [21] A -- Ms. Currie was asking me was she -- she, I  
 [22] think, also said that -- that Ms. Lewinsky was kind of bored  
 [23] with her job at the Pentagon, and was there any other  
 [24] prospect for another job in the administration. Either in  
 [25] the White House or at some other agency.

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[1] Q Is that -- do you recall anything else from your  
 [2] conversation with Ms. Currie, or is that -- is that the  
 [3] extent of the conversation with her after you were told by  
 [4] Mr. Bowles, or asked by Mr. Bowles to look into it?  
 [5] A I think that -- that captures the -- captures it.  
 [6] I don't remember anything else. I remember what I -- how I  
 [7] responded, but I don't remember anything else that you asked.  
 [8] Q I may not have asked you, how did you respond?  
 [9] A I told her -- I said that -- that I wasn't sure,  
 [10] I didn't know anything about her or what was going on, but if  
 [11] -- that if she wanted -- if she, Ms. Lewinsky, wanted to call  
 [12] me I would be willing to talk to her about this.  
 [13] Q And did she?  
 [14] A No, not to the best of my knowledge. I -- I  
 [15] don't --  
 [16] Q Okay -- I'm sorry, go ahead.  
 [17] A I don't think I talked to her, and I have no phone  
 [18] notes indicating that she called.  
 [19] Q What happened next? After you advised Ms. Currie  
 [20] of that, what, if anything else, happened with regard to  
 [21] looking into the matter?  
 [22] A I just -- it kind of dropped at that.  
 [23] Q Did you ever --  
 [24] A I felt like I had done what I needed to do.  
 [25] Q Okay. Did you --

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[1] A I --  
 [2] Q I'm sorry.  
 [3] A I had a complaint, I gave her an avenue for  
 [4] pursuing it if she wanted to, and that was it.  
 [5] Q And the avenue was to call you and see --  
 [6] A If she wanted to call me and talk to me about  
 [7] whether -- whether there were other job opportunities I was  
 [8] willing to talk with her.  
 [9] Q Did you -- did you communicate, either directly or  
 [10] indirectly, back to Mr. Bowles that you had looked into it?  
 [11] A I don't -- I don't know. I don't think so. I  
 [12] think I just thought I had handled it.  
 [13] Q Okay.  
 [14] A I may have said something to them, I just don't  
 [15] remember.  
 [16] Q Okay. To the best of your recollection, did you  
 [17] ever communicate anything back, whether directly or  
 [18] indirectly, to the President about the matter?  
 [19] A No.  
 [20] Q Okay. Other than telling Betty that she could call  
 [21] you, did you communicate anything back to Betty Currie  
 [22] about -- about the matter, directly or indirectly?  
 [23] A I -- I kind of felt like the ball was in her court,  
 [24] and I was done. If -- I've got a zillion things to do every  
 [25] day, and it wasn't like --

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[1] Q This wasn't high on the list?  
 [2] A This wasn't high on the list, and I wasn't keeping  
 [3] it on the list. If she wanted to follow up she could follow  
 [4] up, and I had done a courtesy for Ms. Currie, who was, as I  
 [5] said, a close friend of mine.  
 [6] BY MR. WISENBERG:  
 [7] Q She is a close friend of yours?  
 [8] A Ms. Currie. Ms. Currie is.  
 [9] Q Okay. Has she ever --  
 [10] MR. WISENBERG: Do you mind if I ask a couple --  
 [11] MR. BARGER: No, not at all  
 [12] BY MR. WISENBERG:  
 [13] Q Has she ever asked you directly for a favor like  
 [14] that, without going through the President?  
 [15] A We have talked about a variety of things, including  
 [16] personnel, salary, working conditions, that kind of thing.  
 [17] Q So there would be some occasions where she has  
 [18] discussed similar type things with you directly, as opposed  
 [19] from having it come from the President through Erskine Bowles  
 [20] to you?  
 [21] A I -- you know, you could characterize almost as to  
 [22] whether those are similar. I don't think she would have. I  
 [23] think if she wanted to have come to talk to me about this she  
 [24] would have felt free to come talk to me about this.  
 [25] I -- but I -- but I didn't read anything much into

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[1] that either. I think if she had -- if she had raised it with  
 [2] the President it would easily follow the track that it went  
 [3] on.  
 [4] Q Okay. But since I wasn't -- I wasn't there, and I  
 [5] don't want to characterize it incorrectly, I will ask you,  
 [6] you know, would you characterize it or -- the things that she  
 [7] has discussed with you directly as similar in nature to that  
 [8] request?  
 [9] A I'm kind of a little bit back on the -- on the  
 [10] point I was earlier, which is that I think generally similar.  
 [11] and I think Ms. Currie would have probably felt open to  
 [12] discuss this with me if she had thought about it.  
 [13] Q Okay.  
 [14] A But I -- but I can't think of anything that is kind  
 [15] of directly on point that she has brought to me.  
 [16] Q And I know it is just a -- you said it was a very  
 [17] brief conversation --  
 [18] A My conversation with Ms. Currie?  
 [19] Q No, with --  
 [20] A Mr. Bowles?  
 [21] Q Mr. Bowles, I think your words were --  
 [22] A A minute or two.  
 [23] Q -- no particular texture to it --  
 [24] A Right.  
 [25] Q -- if I'm not mistaken. And I don't mean to imply

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[1] anything sinister about this, but do you recall another --  
 [2] another occasion, you know, when Mr. -- Mr. Bowles basically  
 [3] asked you to do something at the President's request that was  
 [4] purportedly coming through Betty?  
 [5] A No. I can't think of anything specific.  
 [6] MR. WISENBERG: I'm going to excuse myself. Carry  
 [7] on, for just a few minutes.  
 [8] BY MR. BARGER:  
 [9] Q I -- I take it, from the -- the friendship you had  
 [10] with Betty, if Betty wanted to come talk to you directly she  
 [11] could have?  
 [12] A Uh-huh.  
 [13] Q But in the fact that she didn't wasn't necessarily  
 [14] anything that you found unusual at the time?  
 [15] A Correct.  
 [16] Q Did you ever -- did there ever come a time when you  
 [17] -- when you had any further conversation with Betty along the  
 [18] lines, for example, of, "You know, I never heard back from  
 [19] her. She must not be interested."  
 [20] In other words, was there any follow-up by you to  
 [21] mention, you know, the ball was in her court, but --  
 [22] A I don't believe I followed up, and until the fall I  
 [23] never heard about it again.  
 [24] Q And you mentioned the fall, we will come to that.  
 [25] We will come to that next.

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[1] But just to make sure we have covered the bases on  
 [2] this -- sort of this spring/summer time period. Aside from  
 [3] Mr. Bowles and Ms. Currie, do you recollect whether --  
 [4] talking to anyone else other than those two people about that  
 [5] topic in -- in that time frame?  
 [6] A No.  
 [7] Q Okay. Now you mentioned the fall. Could you tell  
 [8] us, was there a subsequent -- was there some subsequent  
 [9] activity in the fall of -- approximately the fall of 1997  
 [10] that related to Ms or Miss Lewinsky?  
 [11] A Yes.  
 [12] Q And can you explain to the grand jury what that  
 [13] involved.  
 [14] A This time Ms. Currie approached me directly, and --  
 [15] and had a conversation with me. And reminded me who Miss  
 [16] Lewinsky was. That she was her friend from the Pentagon.  
 [17] And told me that she was moving to New York. That her mother  
 [18] -- she was living with her -- this is -- I don't remember  
 [19] exact details --  
 [20] Q Sure.  
 [21] A -- of this conversation, but --  
 [22] Q As best you recollect.  
 [23] A -- as best of my recollection, I think what she  
 [24] said to me was that her -- she had been living with her  
 [25] mother, that her mother had moved to New York, and that she

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[1] wanted to move to New York, and was going to continue to live  
 [2] with her mother. And asked me whether I could give her any  
 [3] referrals of any people she could talk to about getting a job  
 [4] in New York.  
 [5] Q Okay. So now the -- sort of the landscape had  
 [6] shifted from coming back to the White House to --  
 [7] A Or getting another federal, to -- to -- did I  
 [8] know -- could I give her some job references in New York.  
 [9] Q Okay. What happened next with reference -- is that  
 [10] essentially -- is that basically the essence of the entire  
 [11] conversation with Ms. Currie about it? About -- about Miss  
 [12] Lewinsky at that time?  
 [13] Maybe covered, as best you recollect, the entire  
 [14] context of the conversation with regard to Miss Lewinsky?  
 [15] A That is -- that is the -- that is to the best of my  
 [16] recollection on it.  
 [17] Q Okay.  
 [18] A I -- I think this only lasted a couple of minutes,  
 [19] at the most.  
 [20] Q Do you recall where that conversation occurred?  
 [21] Was that at the White House?  
 [22] A Yeah, it would have been at the White House.  
 [23] Q Do you recall whether it was in the --  
 [24] A I think it would either have been in my office  
 [25] or -- I'm often in her office. As the grand jurors may know,

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[1] her office is the place where staff assemble to go see the  
 [2] President. So it is immediately adjacent to the Oval Office.  
 [3] So if there is -- I see her five times a day.  
 [4] And so I am often in her office, standing next to  
 [5] her desk, waiting until the President is ready to see me, or  
 [6] the group of people that I am with. And so it could -- it  
 [7] could have been it happened just in the context of -- of  
 [8] standing next to her desk.  
 [9] So I don't -- I don't really remember.  
 [10] Q I apologize if I have asked you this in one way or  
 [11] another. Sometimes I forget. Has Ms. Currie ever asked you  
 [12] to help any other former White House employee obtain  
 [13] employment, as best you recollect?  
 [14] A I have to jog my memory. I don't -- nobody  
 [15] immediately comes to mind, but she is what -- has in the  
 [16] past, in my circumstances, my dealings with her over the  
 [17] years has helped people find employment. So I didn't think  
 [18] there was --  
 [19] Q She has?  
 [20] A She --  
 [21] Q No, I --  
 [22] A Ms. Currie has asked me, or has asked, you know,  
 [23] made job references, et cetera.  
 [24] Q Okay. No -- and I don't mean to suggest that there  
 [25] is anything unusual --

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[1] A Right.  
 [2] Q I'm just --  
 [3] A But I can't think of any other former employee who  
 [4] she asked me -- that she personally asked me to help.  
 [5] (Counsel conferred.)  
 [6] MR. BARGER: Mr. O'Brien just reminded me to make  
 [7] sure I don't lose sight of the clock, so we don't --  
 [8] A All right. To give some context to that, I  
 [9] probably do get -- you know -- twenty would not be an  
 [10] exaggeration, fifty might be realistic, requests like that a  
 [11] month. I just can't think of any that came from Ms. Currie.  
 [12] Q Okay. And what happened -- what happened next wi  
 [13] respect to Ms. Currie asking you, in the fall of 1997, to see  
 [14] what you could do with regard to Miss Lewinsky, you know,  
 [15] getting a position, or references, et cetera, in New York?  
 [16] Could you -- what happened next?  
 [17] A She -- (I told her I would think about it. And if I  
 [18] could come up with anybody that I would -- I would go ahead  
 [19] and let her know, or, you know, get back to her.  
 [20] Q Okay. And what happened after that? Did you come  
 [21] back and tell her?  
 [22] A No.  
 [23] Q Or did you do something?  
 [24] A I did something.  
 [25] Q Okay. And what was that?

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[1] A Shortly after that conversation -- so I would place  
[2] that conversation in early October -- the President took a  
[3] trip to South America. I was running the trip -- if you will  
[4] -- as the traveling Chief of Staff on the trip.  
[5] And during the course of that trip I talked to  
[6] Ambassador Richardson, from the UN. This was in the  
[7] context -- I believe this occurred on Air Force One.  
[8] But on these foreign trips you spend a lot of time  
[9] cooling your heels. And in -- in between. You know, they  
[10] are exciting and they are interesting, but there is also a  
[11] lot of time where you are just doing nothing. As you are  
[12] either traveling on the air plane, or you are waiting for a  
[13] meeting.  
[14] I think this actually occurred on the airplane. I  
[15] don't have a vivid recollection of it.  
[16] Q Okay.  
[17] A But in the context of talking to Ambassador  
[18] Richardson, who also I have known for a while and is a friend  
[19] of mine, I raised the fact that Ms. Currie had a friend who  
[20] was moving to New York, who was a low level, entry level  
[21] public affairs person, and did he -- could he take a look at  
[22] her, or did he have any low level public affairs jobs open in  
[23] his -- in the Mission at -- in the UN.  
[24] Q Okay. As best -- I take it the best -- your best  
[25] recollection is you believe the first conversation with

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[1] Ambassador Richardson was on the trip, or --  
[2] A I -- I'm relatively certain it was on the trip.  
[3] And I think it was on the airplane. And I think we were just  
[4] kind of shooting the breeze. And it popped into my mind and  
[5] I raised it with him.  
[6] Q What, if anything, did he say in response to your  
[7] request or suggestion?  
[8] A He asked me what her name was, which I at the time  
[9] couldn't remember. And I said that why didn't I have -- and  
[10] he -- he said that he might have something at the UN, that  
[11] they had some positions in their public affairs office.  
[12] And he said -- I said to him, "Why don't I have  
[13] Betty get you a resume of this young woman?"  
[14] Q Okay. And then what happened next? I mean, what  
[15] steps, if any, were taken, or did they get a resume, and, if  
[16] so, how?  
[17] A I think what happened next was that I kind of  
[18] forgot about it. (Chuckling.) Because Mr. Richardson's  
[19] assistant -- I don't know her exact title, but -- but I have  
[20] known her for some time, whose --  
[21] Q Do you recall her name?  
[22] A Yeah, Isabelle Watkins.  
[23] Q Okay.  
[24] A Called my assistant -- mixing names up here.  
[25] Q And your assistant?

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[1] A My assistant's name is Sarah Latham. Ms. Watkins,  
[2] Richardson's assistant, says to call Ms. Latham, and said,  
[3] "John mentioned some person that he wanted Bill to take a  
[4] look at, on the trip, or mentioned some person they want to  
[5] take a look at, do you have a resume?"  
[6] Sarah knew nothing about this, so she asked me --  
[7] she told me that Isabelle had called, and who was this  
[8] person, and what was going on. I said, "That's a friend of  
[9] Betty's, just get -- have Betty get in touch with Isabelle  
[10] and deal with this directly?"  
[11] Q Okay. The fact that Isabelle called Sarah suggests  
[12] that the Ambassador mentioned it to Isabelle; is that fair to  
[13] say?  
[14] A Absolutely.  
[15] Q Okay. Do you know whether that is the case, or  
[16] not?  
[17] A No. No, I don't know that is the case.  
[18] Q Okay.  
[19] A But it certainly suggests that.  
[20] Q Okay.  
[21] A Right.  
[22] Q So the direction was, "Check with Betty."  
[23] A I told her, I said --  
[24] Q To Sarah?  
[25] A -- "It is a friend of Betty's, tell Betty to deal

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[1] with Isabelle directly."  
[2] Q What happened next? At least as far as you know,  
[3] or as you understand it?  
[4] A I remember -- the only other thing I remember about  
[5] this whole transaction was I -- and I have the vaguest of  
[6] recollections about this -- is that I think I bumped into  
[7] Bill, Ambassador Richardson, in the White House, and he  
[8] said -- and he is there a lot, especially during this period  
[9] of time, he is there quite often because he speaks at  
[10] National Security Council meetings -- and -- so I saw him,  
[11] literally bumped into him in the hallway. And I believe he  
[12] said to me that, "We're going to talk to that friend." Or,  
[13] "We have talked to that friend of Betty's." Or, "Of yours."  
[14] Or something like that.  
[15] Q Okay.  
[16] A I don't really recall exactly. But -- I mean,  
[17] it -- I think I knew what he meant. And I just have a vague  
[18] recollection that he -- I had that much interaction with him.  
[19] Q So, as best you recollect, if you -- if you include  
[20] -- well, you had a total of two conversations with Ambassador  
[21] Richardson, one on the airplane as -- or Air Force One -- as  
[22] best you recollect on the second brief encounter at the White  
[23] House?  
[24] A In the hallway, yeah. It couldn't have lasted more  
[25] than ten seconds.

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[1] Q As far as you knew it was Sarah's responsibility to  
[2] -- to take care of getting the resume, or having Betty get  
[3] the resume to the Ambassador's staff?  
[4] A As far as I knew it was Sarah's responsibility just  
[5] tell Betty to take care of this.  
[6] Q Okay.  
[7] A If she wanted to pursue get a resume out.  
[8] Q I take it, you didn't do anything beyond that to  
[9] obtain the resume, and transmit it to the --  
[10] A No.  
[11] Q -- Ambassador?  
[12] A No.  
[13] Q What, if anything, happened after the Ambassador  
[14] indicated to you they were going to meet with her, look into  
[15] it, or deal with it?  
[16] A I, basically, lost track of it until recently when  
[17] I read about what happened.  
[18] Q Okay. When -- now, in mentioning that you read  
[19] about what happened, did there come a time in -- in about  
[20] January 18th, or the early morning hours of January 19th,  
[21] that the media published information about Monica Lewinsky,  
[22] referred to what is known as The Drudge Report?  
[23] A Yes. But --  
[24] Q I'm sorry, go ahead.  
[25] A The -- I had a previous conversation on that day

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[1] with a reporter about this.  
[2] Q On -- do you recall what day it is we are talking  
[3] about? Whether it is the 18th --  
[4] A Do you have a calendar? It is Saturday.  
[5] Q Okay. The 17th.  
[6] A I thought it was the 17th.  
[7] Q The day of the President's deposition?  
[8] A The day of the President's deposition.  
[9] Q Since you mentioned the deposition, just to give  
[10] context for the members of the grand jury, was there --  
[11] directing your -- sounds like I'm in court -- let me -- on  
[12] January 17th, of 1998 was the President -- or did the  
[13] President give a deposition in the civil case Jones v.  
[14] Clinton?  
[15] A That is -- it is my understanding that he did.  
[16] Q At least, that is what you understand. All right.  
[17] Now, you alluded to having a conversation with a reporter.  
[18] Do you remember what -- was it the same day as the  
[19] deposition?  
[20] A Yes.  
[21] Q Okay. Morning, afternoon, evening?  
[22] A The morning.  
[23] Q In general, what did the conversation with the  
[24] reporter concern?  
[25] A Well --

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(1) Q I assume the reporter contacted you?  
 (2) A No.  
 (3) Q Okay.  
 (4) A I contacted the reporter.  
 (5) Q Uh-huh.  
 (6) A Maybe I should just tell the story.  
 (7) Q All right.  
 (8) A Time magazine on -- I believe starting on  
 (9) Friday -- started calling virtually everyone on the senior  
 (10) staff in the White House who they had contact with, saying  
 (11) that Newsweek -- we live in a competitive journalistic  
 (12) environment -- Newsweek was working on a blockbuster story,  
 (13) having to do with Ken Starr and some tapes in the grand jury.  
 (14) And what was going on, what was the story, they didn't want  
 (15) to get beat, what was happening.  
 (16) I didn't -- I believe that started on Friday. So  
 (17) we got numerous calls to numerous people, from numerous Time  
 (18) magazine reporters. Their whole bureau was kind of thumb-  
 (19) banging the White House, to see if they could find out --  
 (20) that there was a rumor kind of out on the street that  
 (21) Newsweek was breaking a blockbuster story.  
 (22) And for those of you who are not in the news  
 (23) business, this is the way these people do business. They  
 (24) kind of chase each other around and they -- especially the  
 (25) news magazines, which -- whose deadlines are on Saturday.

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(1) They don't like to get beat, so they were scratching at the  
 (2) White House, to figure out whether we knew and whether we  
 (3) would tell what was going on.  
 (4) I don't think I knew about that on Friday, although  
 (5) I think those phone calls were Saturday -- Friday.  
 (6) Saturday morning Mr. Sosnik came in to see me and  
 (7) related that several Time magazine reporters had called him.  
 (8) Mr. Sosnik's title is Counsel to the President, handles a  
 (9) variety of communications and political chores for the  
 (10) President. Been with him for a while.  
 (11) He came and he -- and he deals a lot with the  
 (12) press, and deals a lot with these reporters. Came in to see  
 (13) me. We were in the White House, working on the State of the  
 (14) Union and the State of the Union rollout. So we had a  
 (15) meeting scheduled -- this was on the 17th -- that Ms.  
 (16) Matthews was chairing and that I was participating in to work  
 (17) up the -- make progress on the State of the Union text.  
 (18) Q That was -- that would still be Friday, right?  
 (19) A This was on Saturday.  
 (20) Q On Saturday. I'm sorry.  
 (21) A Right. So the President has gone off to do his  
 (22) deposition. And Mr. Sosnik came in, he said, "What's going  
 (23) on? What are all these Time magazine people doing?" Et  
 (24) cetera.  
 (25) I contacted Ms. Mills, who is the Deputy White

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(1) House Counsel, and said, "Do you know what is going on here?  
 (2) Is Starr up to something? Are we in some stories? Is  
 (3) Newsweek breaking something? Do we need to react to this?"  
 (4) And the name of the reporter in -- at Newsweek was  
 (5) also mentioned in these Time conversations. His name is Mike  
 (6) Isacof, who is someone I know. So Cheryl said to me -- Ms.  
 (7) Mills said to me that she -- she had also gotten calls from  
 (8) Mr. McCurry, our Press Secretary, and others saying, "What is  
 (9) going on?" "What is the story?"  
 (10) These people were -- they were almost  
 (11) hyperventilating, they were -- they just knew something was  
 (12) breaking and they didn't know what it was.  
 (13) Q Who are these people, Time?  
 (14) A Time.  
 (15) Q Okay.  
 (16) A And she said she had checked with Mr. Kendall, who  
 (17) is the President's private attorney in these Whitewater  
 (18) matters, and that Mr. Kendall had not gotten a call from  
 (19) Newsweek for comment.  
 (20) We were concerned -- telling you our business, how  
 (21) we do business -- we were concerned a little bit that  
 (22) Newsweek might wait until the very end of the day, call us  
 (23) for comment just before they went to bed, and -- and we would  
 (24) be sitting there with some major story that we didn't know  
 (25) the dimensions of and would have to react to it in the last

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(1) few minutes on Saturday night.  
 (2) I said -- kind of took it upon myself to say, "Why  
 (3) don't I call Mr. Isacof and find out what he is doing." So  
 (4) that we have time, at least during the day on Saturday, if  
 (5) there was some big story breaking that we would be able  
 (6) therefore to react to it.  
 (7) That was not an unusual thing. I have known Mr.  
 (8) Isacof, as I said, for a few years and I have dealt with him  
 (9) on various matters. He has even come in and taught my class  
 (10) when I was at Georgetown Law School, the role of the press in  
 (11) investigative matters.  
 (12) And so I called him, and he said to me that -- I  
 (13) said to him, "Were you --" what was going on, was he working  
 (14) on a story about Starr and the grand jury, and he said, "No."  
 (15) He said that he was working on a Paula Jones story, and that  
 (16) he had put some calls in to Mr. Bennett, who is the  
 (17) President's counsel in the Paula Jones matter, and could I  
 (18) help him get a call returned from Mr. Bennett.  
 (19) And I said that I didn't think that was likely,  
 (20) given the fact that Mr. Bennett was at the deposition with  
 (21) the President, but if I could I would see what I could do.  
 (22) BY MR. WISENBERG:  
 (23) Q Let's -- can we distinguish what Mr. Bennett we are  
 (24) talking about?  
 (25) A Bob Bennett.

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(1) Q Okay.  
 (2) A Are there more Mr. Bennetts? Oh, there is Jackie  
 (3) Bennett --  
 (4) Q Right, William --  
 (5) A He works with you?  
 (6) Q That is right.  
 (7) A Our Mr. Bennett, as opposed to your Mr. Bennett.  
 (8) BY MR. BARGER:  
 (9) Q As opposed to Mr. Bennett's brother?  
 (10) A Mr. Bill Bennett, who is a critic of the President.  
 (11) (Chuckling.)  
 (12) Q Okay.  
 (13) A They are not related, are they? Your Mr. Bennett  
 (14) is not related to this --  
 (15) MR. WISENBERG: Oh --  
 (16) Q The other two Bennetts are brothers though, right?  
 (17) A In the vast confusion of all this, we also have a  
 (18) Jackie Bennett who works at the White House. So --  
 (19) FOREPERSON: Excuse me, Mr. Barger.  
 (20) MR. BARGER: Yes, ma'am?  
 (21) FOREPERSON: I hate to interrupt, but --  
 (22) MR. BARGER: I know we are getting --  
 (23) FOREPERSON: -- we need to adjourn.  
 (24) MR. BARGER: Yes, ma'am. I didn't want to  
 (25) interrupt the witness in --

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(1) THE WITNESS: Mid-story.  
 (2) MR. BARGER: Correct. There may be one or two  
 (3) follow-ups --  
 (4) MR. WISENBERG: It is not a follow-up, I think it  
 (5) can be answered very quickly. May I ask three or four  
 (6) questions?  
 (7) FOREPERSON: Certainly.  
 (8) BY MS. WISENBERG:  
 (9) Q Could we -- I would like to have your White House  
 (10) phone number.  
 (11) A [REDACTED] is the main line that I normally use.  
 (12) Q Is that a direct line to you, or to your office?  
 (13) A That is to my office.  
 (14) Q Okay. Do you have a direct line?  
 (15) A Yes. [REDACTED]  
 (16) Q And could you give us your home phone, please.  
 (17) A [REDACTED]  
 (18) Q And do you have any cell phones?  
 (19) A I will have to get you the numbers.  
 (20) Q Okay.  
 (21) A I do have a cell phone, but I have to get you the  
 (22) number.  
 (23) Q All right. Beeper, pager?  
 (24) (Witness placed pager on table.)  
 (25) A Yeah.

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[1] Q I can't operate it, can you tell me what your  
 [2] number is?  
 [3] A It is Skypage -- can I get this for you?  
 [4] Q Yes.  
 [5] A Provide it for the record.  
 [6] MR. WISENBERG: Okay. That is all I have got.  
 [7] At any rate, we are stopping basically and you are  
 [8] not through --  
 [9] THE WITNESS: Midstream of --  
 [10] MR. WISENBERG: You are not through talking  
 [11] about --  
 [12] THE WITNESS: -- my conversation with --  
 [13] MR. WISENBERG: -- your conversation with --  
 [14] THE WITNESS: -- Mr. Isacof.  
 [15] MR. WISENBERG: -- Mr. Isacof. Okay.  
 [16] MR. BARGER: I would like the witness to finish his  
 [17] answer and then we could stop, if that is all right?  
 [18] FOREPERSON: Please understand, the grand jurors  
 [19] would like to recess.  
 [20] MR. BARGER: I understand. Can we ask the witness  
 [21] at least how much longer is the answer, approximately how  
 [22] much more would you need to complete your answer?  
 [23] THE WITNESS: Probably a few minutes.  
 [24] FOREPERSON: Okay. We will -- only a very few,  
 [25] because there are those who are concerned --

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[1] MR. BARGER: Yes, ma'am.  
 [2] FOREPERSON: -- about the darkness --  
 [3] MR. BARGER: Absolutely. It is just -- absolutely.  
 [4] I just think it would be hard to -- to pick back up in mid-  
 [5] answer.  
 [6] I know. I understand.  
 [7] BY MR. BARGER:  
 [8] Q If you could just be brief, because the grand  
 [9] jurors do have concerns about getting out of here timely.  
 [10] And we will just -- just go ahead and finish up an answer and  
 [11] we will stop for the day.  
 [12] A He then -- he then -- well, he said he was working  
 [13] on the Paula Jones story, I said, "Well what about tapes of  
 [14] grand juries," and blah, blah, blah. He said he -- he said  
 [15] that he wasn't working on anything related to the -- to the  
 [16] Starr investigation.  
 [17] He then asked me if I knew Monica Lewinsky. And he  
 [18] asked me a couple more questions about Monica Lewinsky. The  
 [19] only one I particularly remember was he asked me if I ever  
 [20] met her, I said I met her once briefly at a funeral. He  
 [21] asked me whose funeral it was, I said, "Nobody you know."  
 [22] And we kind of cut off the conversation.  
 [23] MR. BARGER: We will pick up -- we will pick up  
 [24] there.  
 [25] I don't know exactly what, we have to check with

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[1] the grand jury on schedules. We will let your attorney know  
 [2] when to return.  
 [3] And we would ask that the witness be excused for  
 [4] the day, but he still remains under subpoena. Is that  
 [5] satisfactory, Madam Forelady?  
 [6] FOREPERSON: That is satisfactory.  
 [7] MR. BARGER: All right. Mr. Podesta, thanks for  
 [8] your time and your patience.  
 [9] THE WITNESS: You are welcome.  
 [10] MR. BARGER: You may be excused.  
 [11] (The witness was excused.)  
 [12] (Whereupon, at 4:40 p.m., the taking of the  
 [13] testimony in the presence of a full quorum of the Grand Jury  
 [14] was concluded.)  
 [15] \*\*\*\*\*  
 [16]  
 [17]  
 [18]  
 [19]  
 [20]  
 [21]  
 [22]  
 [23]  
 [24]  
 [25]

## Page 0

[1] CERTIFICATE OF REPORTER  
 [2] I, Thelma M. Edens, the reporter for the United  
 [3] States Attorney's Office, do hereby certify that the witness  
 [4] whose testimony appears in the foregoing pages was first duly  
 [5] sworn by the foreperson or the deputy foreperson of the grand  
 [6] jury when there was a full quorum of the grand jury present;  
 [7] that the testimony of said witness was taken by me by  
 [8] stenomask and thereafter reduced to typewritten form; and  
 [9] that the transcript is a true record of the testimony given  
 [10] by said witness.

[11] \_\_\_\_\_  
 [12] Thelma M. Edens, Court Reporter  
 [13]  
 [14]  
 [15]  
 [16]  
 [17]  
 [18]  
 [19]  
 [20]  
 [21]  
 [22]  
 [23]  
 [24]  
 [25]



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John Podesta, 6/16/98

Grand Jury

Page 1 to Page 96

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CONDENSED TRANSCRIPT AND CONCORDANCE  
PREPARED BY:

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## Page 1

[1] UNITED STATES DISTRICT COURT  
 [2] FOR THE DISTRICT OF COLUMBIA  
 [3] - - - - - x  
 [4] :  
 [5] IN RE: :  
 [6] :  
 [7] GRAND JURY PROCEEDINGS :  
 [8] :  
 [9] :  
 [10] - - - - - x  
 [11] Grand Jury Room No. 3  
 [12] United States District Court  
 [13] for the District of Columbia  
 [14] 3rd & Constitution, N.W.  
 [15] Washington, D.C. 20001  
 [16] Tuesday, June 16, 1998  
 [17] The testimony of JOHN DAVID PODESTA was taken in  
 [18] the presence of a full quorum of Grand Jury 97-2, impaneled  
 [19] on September 19, 1997, commencing at 2:16 p.m., before:  
 [20] SOLOMON WISENBERG  
 [21] Deputy Independent Counsel  
 [22] Office of Independent Counsel  
 [23] 1001 Pennsylvania Avenue, N.W.  
 [24] Suite 490 North  
 [25] Washington, D.C. 20004

## Page 2

[1] PROCEEDINGS  
 [2] Whereupon,  
 [3] JOHN DAVID PODESTA  
 [4] was recalled as a witness and, having been first duly sworn  
 [5] by the Foreperson of the Grand Jury, was examined and  
 [6] testified further as follows:  
 [7] EXAMINATION  
 [8] BY MR. WISENBERG:  
 [9] Q Would you state your name for the record, please?  
 [10] A John D. -- David Podesta, P-o-d-e-s-t-a.  
 [11] MR. WISENBERG: And let me ask for the record, do  
 [12] we have a quorum?  
 [13] THE FOREPERSON: Yes, we do.  
 [14] MR. WISENBERG: Are there any unauthorized persons  
 [15] in the grand jury room?  
 [16] THE FOREPERSON: No, there are not.  
 [17] BY MR. WISENBERG:  
 [18] Q All right. Mr. Podesta, could you tell us what  
 [19] your position is?  
 [20] A I'm the Deputy Chief of Staff at the White House.  
 [21] Q And you have appeared in front of this grand jury  
 [22] before; is that correct?  
 [23] A Yes.  
 [24] Q And you're an attorney; is that correct?  
 [25] A That's correct.

## Page 3

[1] Q Let me go over briefly then some of your rights and  
 [2] responsibilities as a grand jury witness. We went over  
 [3] them -- I think Mr. Barger did -- the last time you were  
 [4] here.  
 [5] A I remember that.  
 [6] Q Pardon?  
 [7] A I remember that.  
 [8] Q All right. And you recall that you have a right to  
 [9] have an attorney outside and to consult with him as long as  
 [10] it's not disruptive to the grand jury process.  
 [11] A Yes.  
 [12] Q And you have brought such an attorney along with  
 [13] you today; is that correct?  
 [14] A That's correct.  
 [15] Q And his name is?  
 [16] A Peter Kadzik.  
 [17] Q Okay. Give us that spelling again?  
 [18] A K-a-d-z-i-k.  
 [19] Q And could you speak up? It would help us. I  
 [20] understand you've got a sore throat.  
 [21] A I apologize. I have a little bit of a sore throat,  
 [22] but I'll try to speak up.  
 [23] Q Okay. You understand that you have a privilege  
 [24] against self-incrimination.  
 [25] A I do.

## Page 4

[1] Q You understand what that is, correct?  
 [2] A Yes.  
 [3] Q And you understand that you have to tell the truth,  
 [4] that your testimony is subject to the penalties of perjury.  
 [5] A Yes.  
 [6] Q All right. You don't need me to explain any of  
 [7] those things further?  
 [8] A No, I understand.  
 [9] Q Okay. If there's anything about my questions that  
 [10] you don't understand, I'll be happy to rephrase them.  
 [11] A Okay.  
 [12] Q All right. I think we were -- let me just say that  
 [13] it's been a while since you were here.  
 [14] A That's true.  
 [15] Q And is it your understanding that we decided to  
 [16] delay your reappearance here until after executive privilege  
 [17] matters were litigated, even though you were not a party to  
 [18] the executive privilege litigation?  
 [19] A Well, that was carried on between the White House's  
 [20] Counsel's Office and your office.  
 [21] Q Okay. Do you understand that that's why there was  
 [22] such a long delay?  
 [23] A I understand that Mr. Ruff suggested to your office  
 [24] that it would be better --  
 [25] Q Okay.

## Page 5

[1] A -- if we can deal with it. I don't think my  
 [2] counsel made such a request.  
 [3] Q Oh, okay. Thank you for the distinction.  
 [4] A Okay.  
 [5] Q I think when we left off last time, you had just  
 [6] hung up with Mr. Isikoff of Newsweek, and I think that was on  
 [7] the Saturday of the President's deposition in the Paula Jones  
 [8] matter.  
 [9] What I'm going to do is backtrack a little bit --  
 [10] A Okay.  
 [11] Q -- and then head back up hopefully chronologically,  
 [12] or in some kind of order.  
 [13] I want to go back for a little bit to the  
 [14] Ambassador Richardson -- your testimony having to do with  
 [15] Ambassador Richardson. You had talked to us before about --  
 [16] I think you said in May or June, before Ambassador  
 [17] Richardson, that the President had asked Mr. Bowles to look  
 [18] into helping -- possibly helping Ms. Lewinsky get a job back  
 [19] at the White House or at some federal agency, and Mr. Bowles  
 [20] had spoken to you about it.  
 [21] And then later on Ms. Currie had contacted you  
 [22] directly about Ms. Lewinsky moving to New York, and you ended  
 [23] up contacting Ambassador Richardson. Is that correct?  
 [24] A Well, I think the sequence is correct. I think  
 [25] that you're putting a little more flesh on the President's

## Page 6

[1] conversation with Mr. Bowles than I remember at this point.  
 [2] Q All right.  
 [3] A I really think that my testimony was that Mr.  
 [4] Bowles had raised with me that the President had raised with  
 [5] him that this person was unhappy about the way she had been  
 [6] treated at the White House in a previous employment  
 [7] situation, and that would he look into that.  
 [8] I think your characterization was that the  
 [9] President asked him to get her a job at the White House or  
 [10] another federal agency.  
 [11] Q Okay.  
 [12] A I don't recall that. If I testified to that, today  
 [13] I don't recall saying it, and I don't recall that in the  
 [14] conversation.  
 [15] Q Okay. So you're saying "looking into," as opposed  
 [16] to --  
 [17] A Right. I mean, you're putting more into that  
 [18] conversation than I recall, at least.  
 [19] Q Okay. And, of course, you don't know -- all you  
 [20] know about the conversation between -- I take it, all you  
 [21] know about the conversation between Mr. Bowles and the  
 [22] President is what Mr. Bowles told you; is that correct?  
 [23] A That is correct.  
 [24] Q All right. Pardon me just a second while I get a  
 [25] document here. Excuse me. I'm looking for a transcript that

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[1] I thought I had and I've misplaced.  
 [2] All right. Let me -- I just want to get us  
 [3] situated. Let me read to you from a transcript from your  
 [4] testimony last time.  
 [5] A Okay.  
 [6] Q And you can tell me whether or not you still agree  
 [7] with that or not.  
 [8] "Question: Do you recall any conversations or do  
 [9] you recall ever having conversations with anyone about Monica  
 [10] Lewinsky?"  
 [11] "Answer: Yes."  
 [12] "Question: All right. And with whom, as best you  
 [13] recollect, were those conversations with?"  
 [14] "Answer: I initially had a conversation, which I  
 [15] can't place precisely, but I would say late in the spring or  
 [16] early in the summer, initially with Mr. Bowles. Mr. Bowles  
 [17] said to me that" --  
 [18] "Question: This is 1997?"  
 [19] "Answer: 1997. And, again, I can't -- I can't  
 [20] place a specific time frame on it."  
 [21] "Question: Okay."  
 [22] "Answer: But I would say it would be, you know,  
 [23] maybe May or June, something like that. A lot goes on there  
 [24] so it is all kind of a swish that swirls back out quickly.  
 [25] "Mr. Bowles said to me that in a conversation he

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[1] had with the President that Ms. Lewinsky had come up, that  
 [2] she was a friend of Ms. Currie's, that she had worked at the  
 [3] White House, and that she, Ms. Currie, had been in touch with  
 [4] her.  
 [5] Well, I'm forwarding to it. I think that was a  
 [6] subsequent conversation."  
 [7] "Question: Okay."  
 [8] "Answer: That she was a friend of Ms. Currie's,  
 [9] that she had worked in the White House, that she had been  
 [10] sent over to work in the Pentagon, that she was unhappy that  
 [11] that had happened and thought that she hadn't been treated  
 [12] fairly in that job move, and that could he look into it."  
 [13] "Question: And 'he look into it,' meaning Mr.  
 [14] Bowles look into it."  
 [15] "Answer: Yeah, because Mr. Bowles -- I mean,  
 [16] when -- in that context, I think."  
 [17] "Question: As you understood it?"  
 [18] "Answer: As I understood it, I mean, the -- this  
 [19] is not -- the President will just often offload things to Mr.  
 [20] Bowles" --  
 [21] "Question: Sure."  
 [22] "Answer: -- expecting that Mr. Bowles would divvy  
 [23] up that responsibility. So I don't know that that was -- I  
 [24] don't take that from that that that was personally that Mr.  
 [25] Bowles would look into it, but" --

## Page 9

[1] "Question: Oh, I understand."  
 [2] "Answer: There was this person there that he  
 [3] would, you know, look into the matter."  
 [4] All right. Is that basically your memory today,  
 [5] what I've just read there also?  
 [6] A Yeah.  
 [7] Q Okay. Let me also refer to another transcript.  
 [8] A I think that's consistent with what I just said.  
 [9] Q Yes, I think it is. I think it's more consistent  
 [10] with what you said than what my question was.  
 [11] Now, I want to talk for a minute about Ambassador  
 [12] Richardson. That happened later, after Ms. Currie came to  
 [13] you; is that correct?  
 [14] A That's correct.  
 [15] Q At any time when you were speaking to Ambassador  
 [16] Richardson did you get the impression from anything he said  
 [17] or the way he acted that he had already heard of Monica  
 [18] Lewinsky or heard of this person you were talking about from  
 [19] somebody other than yourself?  
 [20] A No.  
 [21] Q You testified last time to the effect that at some  
 [22] point you bumped into him after you had mentioned this  
 [23] person, this friend of Betty Currie's to him, and he had told  
 [24] you his office was going to interview her.  
 [25] After that time did you ever get any feedback from

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[1] anyone about how that interview went or anything like that?  
 [2] A I don't -- I don't think so. I don't recall  
 [3] getting anything back. I think you've put two conversations  
 [4] together, though.  
 [5] Q Okay.  
 [6] A I talked to him originally and said that I had a  
 [7] friend who had a friend, and did he have any junior level  
 [8] public affairs jobs, and he said he might. And I said,  
 [9] "Well, let me follow up" -- I don't know whether I testified  
 [10] to this in the last conversation, but I couldn't remember her  
 [11] name at the time, but said that I would follow up about it.  
 [12] That Betty was a good friend of mine -- this was a fairly  
 [13] brief conversation. He said, "Fine."  
 [14] I think at some point, probably a couple weeks  
 [15] after that, he said -- I ran into him in the hallway at the  
 [16] White House, and he said -- and I can't specifically recall  
 [17] whether he said, "I have talked to her," or, "I'm going to  
 [18] talk to her, your friend" -- or "Betty's friend."  
 [19] Q Okay.  
 [20] A He knew Betty, so --  
 [21] Q Right.  
 [22] A So in the initial conversation, he knew who -- I  
 [23] told him it was a friend of Betty's.  
 [24] Q Right.  
 [25] A So I believe that that was -- that's the

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[1] conversation you're referring to. It's that second  
 [2] conversation --  
 [3] Q Right.  
 [4] A -- in which he said -- he said, I think -- and I  
 [5] just don't remember whether he said, "I've interviewed her,"  
 [6] or, "I'm going to interview her," or something to that  
 [7] effect.  
 [8] Q Okay.  
 [9] A I said, "Great."  
 [10] Q And after that you didn't hear any feedback, as far  
 [11] as you know?  
 [12] A No. I don't recall hearing any feedback.  
 [13] Q And do you have any knowledge -- did you have it at  
 [14] the time or have you since learned that the President ever  
 [15] talked to Ambassador Richardson about Ms. Lewinsky, in  
 [16] addition to you talking to Ambassador Richardson?  
 [17] A I'm unaware of that, if it happened.  
 [18] Q Did she -- again, I'm not excluding anything that  
 [19] you've read in the papers, okay? Did you ever hear before or  
 [20] after the scandal broke from anybody that she did get a UN  
 [21] offer?  
 [22] A I heard that subsequently in the press.  
 [23] Q Okay. But aside from the press, you don't --  
 [24] A I don't believe I --  
 [25] Q nt.

## Page 12

[1] A -- knew that before I heard about that in the press  
 [2] after the story broke.  
 [3] Q And, I take it, you wouldn't know whether or not --  
 [4] or didn't hear about it before the story broke.  
 [5] A I don't think I did.  
 [6] Q Did you hear anything -- and sometimes I'm going to  
 [7] ask you a specific question after you've denied recollection  
 [8] of a general matter just to see if it jogs your memory.  
 [9] A Okay, that's fine.  
 [10] Q Did you ever hear at the time, before the scandal  
 [11] broke, that she had gotten a UN offer, but wasn't really  
 [12] interested in it, that is, Ms. Lewinsky?  
 [13] A No, I don't recall hearing that from anyone. I've  
 [14] already testified that I think I heard that she had gotten --  
 [15] actually gotten an offer after the story broke.  
 [16] Q When Ms. Currie first talked to you about New  
 [17] York -- about you helping with a New York job for her friend,  
 [18] did she say why Monica had never called you earlier, from the  
 [19] May-June incident?  
 [20] A As you recall, I think you testified -- you correct  
 [21] me if I've got it wrong -- that after you had the  
 [22] conversation with Mr. Bowles, you went to Ms. Currie and  
 [23] said, "Have her call me if she wants to." and she never did,  
 [24] is that correct?  
 [25] A That's correct.

## Page 13

[1] Q Ms. Lewinsky, that is.  
 [2] A Ms. Lewinsky, right, that's correct.  
 [3] Q And so my question to you is, when Betty Currie  
 [4] talked to you about Monica and New York, reminded you that  
 [5] she had this friend, did she say why Monica had never called  
 [6] you?  
 [7] A No, not that I recall. She said to me, as I recall  
 [8] the conversation, that she was moving -- that her mother  
 [9] lived -- I think her mother lived in Washington, had moved to  
 [10] New York, she wanted to move to New York with her mother, and  
 [11] could I give her -- you know, could I give her any ideas  
 [12] about where to look for a job.  
 [13] Q Okay. Do you recall talking to her -- you said she  
 [14] didn't talk to you. Did you ask her why Monica hadn't called  
 [15] you back earlier?  
 [16] A No, not that I recall.  
 [17] Q Okay. Do you recall -- I want to go back now to  
 [18] the May-June incident.  
 [19] A Okay.  
 [20] Q The conversation you had with Mr. Bowles that  
 [21] prompted you to go to Ms. Currie.  
 [22] When you went to her, did Ms. Currie indicate to  
 [23] you in any way -- again, this is the earlier incident. Did  
 [24] she indicate to you in any way that it might be best that  
 [25] Monica not come back to the White House?

## Page 14

[1] A I think she said to me she wanted to -- she didn't  
 [2] like the job at the Pentagon. She said that to me. She  
 [3] wanted to move on either to the White House or to another  
 [4] agency. And she gave me the circumstances that Ms. Lieberman  
 [5] had sort of asked her to go to the Pentagon.  
 [6] I don't recall whether she said it was best if she  
 [7] didn't come back or -- but there was a -- you know, there was  
 [8] a context of her feeling like she hadn't been treated  
 [9] fairly -- that was -- that was my recollection of the  
 [10] conversation -- and, you know, could I look into it. You  
 [11] know, could I look into it, et cetera.  
 [12] I said to her, as I think I testified, "Well, if  
 [13] she wants to talk to me, tell her to give me a call."  
 [14] Q And I think you -- you correct me if I'm wrong -- I  
 [15] think last time you said that Ms. Currie informed you of why  
 [16] Ms. Lieberman had had her transferred out, that she thought  
 [17] she was hanging around --  
 [18] A She was hanging around the West Wing too much.  
 [19] Q Okay, all right. And so what I'm trying to  
 [20] determine is -- let me just say that some people could  
 [21] consider it intriguing that somebody of Ms. Lewinsky's  
 [22] persistence, with her desire to get back to the White House,  
 [23] would consider it intriguing that she would be told -- of  
 [24] course, you don't know if Ms. Currie relayed your message --  
 [25] that she could be told to call you and that she wouldn't call

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[1] you.  
 [2] And with that as a preface -- that's a preface to  
 [3] my question. Did Ms. Currie say, do, act in any way to you  
 [4] to lead you to indicate that it really wouldn't be best for  
 [5] Monica Lewinsky to be back in the White House area?  
 [6] A I don't think so. I don't recall that, you know,  
 [7] other than what I've testified to. I think I've given you  
 [8] the gist of what I remember from the conversation.  
 [9] Q Okay. Would that have been enough -- well, did Ms.  
 [10] Currie ever tell you whether or not she relayed your message  
 [11] to Monica Lewinsky?  
 [12] A I don't think so.  
 [13] Q Okay.  
 [14] A I don't think she ever told me whether she did or  
 [15] she didn't.  
 [16] Q Whether she did or didn't.  
 [17] A I kind of dropped it at that conversation.  
 [18] Q Okay.  
 [19] A I mean, I felt that Ms. Currie was -- had  
 [20] befriended her, she was kind of looking out for her. I gave  
 [21] her the opportunity to have her call me. She never called  
 [22] me. I never thought about it again.  
 [23] Q Okay.  
 [24] A Then she asked me again in October would I help  
 [25] her. I had that one conversation with Richardson. That was

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[1] the end of it.  
 [2] Q Was the fact that she told you that Evelyn  
 [3] Lieberman had basically -- Mrs. Currie, Ms. Currie. The fact  
 [4] that Ms. Currie told you -- I'm not very articulate today --  
 [5] that the circumstances of Monica's transfer out -- that  
 [6] Evelyn Lieberman was involved in it, and the reasons for it,  
 [7] would that have been enough to tell you right there that she  
 [8] wasn't going to come back to the White House?  
 [9] A Oh, I think I would have looked into it more if I  
 [10] was -- had pursued -- if she had called me, wanted a job back  
 [11] in the White House, and I wanted to pursue that, I guess I  
 [12] would have checked into that.  
 [13] Q I mean, you didn't even know until you talked to  
 [14] Ms. Currie that -- you know, the reason why, or a given  
 [15] reason why Monica had been transferred out, correct?  
 [16] A That's -- the best of my recollection, that's  
 [17] right. I think I heard that from Ms. Currie, not Mr. Bowles.  
 [18] Q Okay. You get this message from the President  
 [19] through Mr. Bowles.  
 [20] A Right.  
 [21] Q And when you go to Ms. Currie to talk about it and  
 [22] to say, "Your friend can call me," you get this information  
 [23] that this is a person who basically got sent packing, in  
 [24] fact, because she hung around the West Wing a little too  
 [25] much. Is that correct?

## Page 17

[1] A I got the impression that she was moved to the  
 [2] Pentagon. Your characterization, "sent packing" --  
 [3] Q Okay. Moved to the Pentagon --  
 [4] A Yeah.  
 [5] Q -- because, among other things, Evelyn Lieberman  
 [6] thought she was hanging around the West Wing too much; is  
 [7] that correct?  
 [8] A That's correct.  
 [9] Q All right. Did that strike you as odd at all, that  
 [10] given the fact that the request is coming from the President,  
 [11] through Bowles -- I understand through Mr. Bowles --  
 [12] A It didn't at the time.  
 [13] Q Okay. In retrospect --  
 [14] A In retrospect, I think that the conversation was  
 [15] such that Betty was a friend of mine, she seemed to have  
 [16] befriended this young woman, and I thought she was trying to  
 [17] do a favor for her. She felt like she had been treated  
 [18] unfairly, and I just took it at face value and said, "Have  
 [19] her give me a call if she wants to."  
 [20] Q Did you think you would get a call?  
 [21] A I don't know. You know, it's a year ago.  
 [22] Q Yes. And I think you said that it was a brief  
 [23] conversation. At least with Mr. Bowles it was a brief  
 [24] conversation you had about this; is that correct?  
 [25] A It couldn't have lasted more than a minute.

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[1] Q Okay.  
 [2] A And my conversation with Ms. Currie couldn't have  
 [3] lasted more than, you know, four or five minutes.  
 [4] Q You're a good friend, an old friend of Ms. Currie;  
 [5] is that correct?  
 [6] A That's correct.  
 [7] Q She's a very intelligent lady; is that correct?  
 [8] A Mm-hmm.  
 [9] Q Is she known to ever convey something to you or  
 [10] others, to people, to convey her feelings about something  
 [11] through facial gestures, as an example, the raising of an  
 [12] eyebrow or something like that?  
 [13] A I don't -- I think she's expressive.  
 [14] Q Okay. And was there any kind of expressive  
 [15] activity that she engaged in when you had this conversation,  
 [16] such as a raised eyebrow or anything like that, that was a  
 [17] signal to you that you shouldn't be asking about helping  
 [18] Monica Lewinsky in any way get back into the White House  
 [19] complex?  
 [20] A I don't recall that if she did. I took this kind  
 [21] of at face value, that she was a friend of hers and she was  
 [22] trying to help her.  
 [23] Q Okay. I think last time you said that you -- you  
 [24] correct me if I'm mischaracterizing. I think you said  
 [25] something to the effect of that you assumed that the

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[1] request -- the President's request of Mr. Bowles had come  
 [2] through Ms. Currie because the President had mentioned to Mr.  
 [3] Bowles that this was a friend of Betty's.  
 [4] Is that a fair characterization of your testimony?  
 [5] A You could read it back to me, but I think so.  
 [6] Q Okay. Do you remember whether Mr. Bowles told  
 [7] you -- actually explicitly told you, "The President told me  
 [8] this is a request coming through Betty Currie"?  
 [9] A No. I don't recall that.  
 [10] Q Okay. It was more along the lines of, "The  
 [11] President said this is a friend of Betty's."  
 [12] A Right.  
 [13] Q Okay. Did Betty Currie, when you went to her with  
 [14] this, did she mention at all when you had this conversation  
 [15] with her -- again, the earlier one, not the New York  
 [16] conversation, but the initial conversation -- did she mention  
 [17] Marsha Scott at all?  
 [18] A I don't think so.  
 [19] Q All right. Did you talk to Marsha Scott at all  
 [20] about this topic?  
 [21] A About Monica Lewinsky?  
 [22] Q Yes.  
 [23] A No, I don't think so.  
 [24] Q Did you know that Marsha Scott at around this time  
 [25] was also supposed to be working on getting Ms. Lewinsky back

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[1] to the White House, in late spring through late summer of  
 [2] '97?  
 [3] A I have heard that from a reporter.  
 [4] Q Okay. But did you know it at the time?  
 [5] A I don't think I knew that at the time.  
 [6] Q Okay. You don't recall Betty saying anything like,  
 [7] as an example, you know, "Talk to Marsha Scott. She's been  
 [8] working on that, too, and she's got some insight," anything  
 [9] along those lines?  
 [10] A I don't think so, but I -- you know, the -- I have  
 [11] heard that Marsha was looking for a job from a reporter. I  
 [12] read it. I think I heard it actually from a reporter.  
 [13] Q That's post-scandal.  
 [14] A That's, I think, post-scandal or -- yeah, I think  
 [15] it's post-scandal.  
 [16] Q Are you aware of any other efforts other than what  
 [17] you've told us about to help get -- again, excluding what  
 [18] you've read in the press or seen on TV -- to get Monica a job  
 [19] -- and I'm including there a New York job or back at the  
 [20] White House or at an agency -- any efforts by Ms. Currie --  
 [21] any other efforts than what you've told us about by Ms.  
 [22] Currie, Mr. Nash, Ms. Scott, anyone else to get Monica a job?  
 [23] A In this period of time?  
 [24] Q Yes, pre-January 21st.  
 [25] A I had one more conversation with Mr. Bowles. I had

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[1] no conversations with Mr. Nash.  
 [2] Q Okay.  
 [3] A I don't believe I ever talked to Ms. Scott about  
 [4] it. I had one more subsequent conversation with Mr. Bowles.  
 [5] Q Okay. Is this the Hilley matter?  
 [6] A Yes.  
 [7] Q Okay. We'll talk about that in just a second. But  
 [8] whether or not you had conversations with anyone else --  
 [9] A No, I didn't know anything about --  
 [10] Q You didn't know anything about any other efforts to  
 [11] get Monica Lewinsky a job.  
 [12] A No.  
 [13] Q Okay. Now, tell us about then the John Hilley  
 [14] matter.  
 [15] A A few days -- you know, three, four days before the  
 [16] President's deposition, sometime in that week before it, Mr.  
 [17] Bowles once again raised Monica Lewinsky with me and said to  
 [18] me something -- I can't precisely recall the exact words of  
 [19] the conversation, and, again, it was quite brief -- that --  
 [20] asked me whether I thought John Hilley, who was the assistant  
 [21] to the President for legislative affairs and I think would  
 [22] have been her supervisor in the chain of -- in the  
 [23] Legislative Affairs Office, was -- would give Ms. Lewinsky a  
 [24] job reference.  
 [25] Q Who asked you that?

## Page 22

[1] A Mr. Bowles.  
 [2] Q Okay. And did he tell you what was causing him to  
 [3] make that request of you?  
 [4] A To the best of my recollection, I think he said  
 [5] something that she had an interview in New York -- I think he  
 [6] -- yeah, I think he mentioned New York. That she had an  
 [7] interview in New York or something, and did I know whether  
 [8] Hilley could serve as a job reference for her.  
 [9] Q Did he say who was making this request beyond him,  
 [10] "him," being Mr. Bowles?  
 [11] A No.  
 [12] Q Okay. He didn't mention that, "The President has  
 [13] asked me to ask you this," for instance?  
 [14] A I don't think so.  
 [15] Q Okay. And what did you respond to him?  
 [16] A I said, "I don't know whether John would give her a  
 [17] reference. I'll ask him if you want me to."  
 [18] Q Okay. Now, did you know -- at this point in time  
 [19] did you recognize the name, Monica Lewinsky?  
 [20] A Yeah.  
 [21] Q All right. And other than the fact that you had  
 [22] these two requests from Betty Currie --  
 [23] A I think he may have -- he may have prompted that --  
 [24] Q Okay.  
 [25] A -- but I -- you know, I mean, I remembered her.

## Page 23

[1] Q Okay. And I misspoke myself because I said -- you  
 [2] had these two previous requests, the first from Mr. Bowles,  
 [3] the second from Ms. Currie, and you said Mr. Bowles now might  
 [4] have prompted you.  
 [5] Other than those two previous requests and the  
 [6] prompting, would there have been any other reason you would  
 [7] have known the name, Monica Lewinsky, at this time?  
 [8] A No.  
 [9] Q Did anything strike you about the request as  
 [10] unusual?  
 [11] A It was -- you know, I get 20 requests a day, so it  
 [12] didn't -- it didn't like -- at the time set some lightbulb  
 [13] off. I said, "If you want me to ask him I'll ask him."  
 [14] Q But whether or not you get 20 a day or it set a  
 [15] lightbulb off, did you consider it unusual in any way?  
 [16] A I don't think I did at the time.  
 [17] Q Okay. The chief of staff asking you about a pretty  
 [18] low-level person, and it's now the third time --  
 [19] A Well, it's a third time --  
 [20] Q -- in a period of six months.  
 [21] A -- over a period of six months, which is a total of  
 [22] -- you know, I've spent eight minutes on this.  
 [23] Q Okay.  
 [24] A So it wasn't like a big deal to me.  
 [25] Q All right. You didn't consider it unusual.

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[1] A I don't think so. I don't think I thought it was  
 [2] unusual at the time.  
 [3] Q Okay.  
 [4] A I mean, a few days later I thought --  
 [5] Q All right. What did you do then as a result of  
 [6] that?  
 [7] A I had a very brief conversation with John, Mr.  
 [8] Hilley, in the hallway, as I recall. It was kind of -- it  
 [9] was a breaking up of a meeting or something, or I just ran  
 [10] into him. I think it was after a meeting or something. And  
 [11] I said -- I think I prompted him. I said, "Do you remember  
 [12] Monica Lewinsky?" He said, "No," I think.  
 [13] I said, "She worked for you. She was moved over to  
 [14] the Pentagon." And that sort of triggered some vague  
 [15] recollection in his memory. And I said, "Can you give her a  
 [16] job reference?" And he said -- he said he couldn't give her  
 [17] a personal reference -- my recollection of the conversation --  
 [18] couldn't give her a personal reference because he didn't  
 [19] really know her.  
 [20] I think he -- I sort of recall that he described  
 [21] them as "ships passing in the night," that he came in and she  
 [22] -- as she was leaving, and that there wasn't much of an  
 [23] overlap.  
 [24] He replaced a man named Pat Griffin, who had been  
 [25] head of Congressional Affairs, and I believe John started in

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[1] early '96. I don't know when she left and went to the  
 [2] Pentagon, but that he had met her, he kind of knew who she  
 [3] was, but they had kind of passed in the night. So that he  
 [4] couldn't give her a personal reference.  
 [5] Q Okay. Any other reason that he couldn't give her a  
 [6] personal reference?  
 [7] A He just said he didn't know her.  
 [8] Q Okay.  
 [9] A I said to him that -- I told him why and said that  
 [10] Erskine had asked me, that she was getting some job interview  
 [11] in New York. And he said -- again, my best recollection is  
 [12] he said, "Well, I could give her" -- he used the term -- I  
 [13] don't remember exactly what it was -- I think it was  
 [14] something like, "I could give her an institutional reference,  
 [15] like that she worked here and these were her duties."  
 [16] Q Okay.  
 [17] A I said, "Fine," and moved on. I mean, again, I  
 [18] talked to him like for 45 seconds.  
 [19] Q Did he say anything to indicate to you that her  
 [20] performance had been less than satisfactory?  
 [21] A I got the distinct impression he didn't really know  
 [22] what her performance had been.  
 [23] Q Okay.  
 [24] A That she was relatively low level, she worked in  
 [25] the East Wing, she had gone to the Pentagon, and that he

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[1] didn't really -- he didn't remember exactly the circumstances  
 [2] about it, although I think that -- that the question of  
 [3] whether Evelyn had something to do with it, I think maybe I  
 [4] said something to him about that, because I knew that fact.  
 [5] Q Okay.  
 [6] A So I was just trying to place her with him.  
 [7] Q All right. About the circumstances of her  
 [8] transfer, you mean?  
 [9] A I think I said -- you know, I may have said to him  
 [10] or he may have said to me -- I just can't remember the  
 [11] conversation -- that, "She went to the Pentagon. I think  
 [12] Evelyn may have something to do with that." And he sort of  
 [13] had some vague recollection of who she was.  
 [14] Q Okay. Did you -- it kind of segues into the next  
 [15] question, which you might have already answered, but I'll ask  
 [16] it anyway.  
 [17] A Okay.  
 [18] Q Did he say anything to you, either by way of a  
 [19] statement or a confirmation of what you had said, that  
 [20] indicated that in any way, either because of her performance  
 [21] or any of her actions while she was there, that it wouldn't  
 [22] be appropriate for him to write a recommendation, other  
 [23] than -- you've already said he doesn't personally know her?  
 [24] A No.  
 [25] Q All right.

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[1] A No, I don't remember that he said anything in that  
 [2] conversation that --  
 [3] Q Did you jog his memory about -- do you recall when  
 [4] you mentioned Evelyn to him -- of course, you keep saying you  
 [5] don't remember if he mentioned it to you or you mentioned it  
 [6] to him.  
 [7] A Yeah, right.  
 [8] Q Right.  
 [9] A I just -- you know, I mean, this seems like the  
 [10] right time to say, you know, there's a lot of water under  
 [11] this bridge of -- I'm trying to remember something that  
 [12] happened five or six months ago about events which I've read  
 [13] a lot about.  
 [14] Q Sure.  
 [15] A I think that I may have prompted who she was in  
 [16] that fashion.  
 [17] Q Okay. Do you recall him then saying anything like,  
 [18] "I don't know what you're talking about. I don't know  
 [19] anything about Evelyn Lieberman or anything like that?"  
 [20] A He just -- I think he had some glimmer of who she  
 [21] was.  
 [22] Q Okay.  
 [23] A And that she had been there when he first got there  
 [24] and she had moved to the Pentagon in something that he had  
 [25] either nothing to do with, or virtually nothing to do with.

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[1] He couldn't hardly recall.  
 [2] Q Did he have a glimmer about the Evelyn Lieberman  
 [3] input into her transfer?  
 [4] A I -- you know, I don't remember that.  
 [5] Q Okay.  
 [6] A We're making more of this conversation than the  
 [7] conversation holds. It was like a -- took about a minute.  
 [8] Q The questions I've asked you about these  
 [9] conversations have far exceeded the conversations themselves.  
 [10] A Absolutely.  
 [11] Q Yes. Probably many people feel that way about the  
 [12] questions that I ask.  
 [13] A JUROR: Excuse me, Mr. Podesta.  
 [14] THE WITNESS: I'm sorry?  
 [15] A JUROR: Do you know if that recommendation was  
 [16] ever written?  
 [17] THE WITNESS: I don't know.  
 [18] BY MR. WISENBERG:  
 [19] Q What did you do after you -- basically he's saying,  
 [20] "We'll give you an institutional," which basically means --  
 [21] A Yeah, I don't remember if that was it. It was some  
 [22] term like that.  
 [23] Q Right.  
 [24] A And it was some term he used that --  
 [25] Q Meaning, "Monica Lewinsky worked here from, you

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[1] know, 'x' date 1995 until 'x' date" --  
 [2] A "1996. And these were her duties."  
 [3] Q Okay. Nothing like, "She was a great worker," or  
 [4] anything like that? Is that your understanding of what he  
 [5] meant when he said that?  
 [6] A Yeah, he said he couldn't furnish his personal  
 [7] reference for her because he hadn't worked with her.  
 [8] Q Okay. Now, what did you do when you got that  
 [9] information from him?  
 [10] A Well, I don't think I did anything with it. It's  
 [11] like it was overtaken by events.  
 [12] Q All right, okay. Is it safe to say if it hadn't  
 [13] been overtaken by events, you would have gotten back to Mr.  
 [14] Bowles with the information?  
 [15] A I think so.  
 [16] Q All right.  
 [17] A Because he asked me could he serve as a reference.  
 [18] I don't think he asked me to get him to serve as a -- and I  
 [19] said I'd check it out and get back to him.  
 [20] Q Okay. Do you recall Mr. Bowles telling you that  
 [21] Monica had actually already listed Mr. Hilley as a reference  
 [22] and that Mr. Bowles wanted to know if he could write a  
 [23] recommendation?  
 [24] A That's not my recollection of the conversation.  
 [25] Q All right. In other words, you --

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[1] A I don't remember that he said that she had listed  
 [2] him, and I don't remember that he requested that he write a  
 [3] recommendation. I think that was your question.  
 [4] Q Yes, either one.  
 [5] A I stated what my recollection is, which is, could  
 [6] he serve as a reference, and I went out and asked that  
 [7] question.  
 [8] Q Okay.  
 [9] A And I would have reported back, but --  
 [10] Q And your recollection was it was for a job  
 [11] interview --  
 [12] A I think so. I think it was for --  
 [13] Q -- as opposed to already having the job.  
 [14] A That's my recollection, yes.  
 [15] Q Okay. Pardon me just a minute.  
 [16] MR. WISENBERG: Let me refer the grand jurors to  
 [17] page -- just for reference, in terms of reference -- to page  
 [18] 155, just for your own information, the second entry from the  
 [19] top on that page and the very bottom entry.  
 [20] BY MR. WISENBERG:  
 [21] Q Do you recall -- that's the second from the top and  
 [22] the very bottom entry on 155. Do you recall whether or not  
 [23] you told Mr. Hilley that you'd get back to him when he gave  
 [24] you his answer?  
 [25] A I don't -- I don't remember whether we just ended

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[1] the conversation. I think he just -- I think that was -- I  
 [2] think we given you what I remember of the conversation,  
 [3] Q Okay. Have you directly or indirectly been in  
 [4] contact with him since the story broke on the 21 st to try to  
 [5] get his recollection of that conversation?  
 [6] A I haven't talked to him about it.  
 [7] Q Okay. But have you directly or indirectly -- and  
 [8] I'm not suggesting that there's anything inherently wrong  
 [9] with this. But have you directly or indirectly attempted to  
 [10] find out his version of that conversation?  
 [11] A That's a mouthful of a question, and I don't even  
 [12] know if I know the answer to it.  
 [13] Q In other words, have you directed or asked anybody  
 [14] to try to find out what his version of events -- I'll ask  
 [15] that first -- what his version of that conversation was?  
 [16] A I think I need to --  
 [17] Q Sure.  
 [18] A -- have a little break.  
 [19] Q Okay.  
 [20] THE FOREPERSON: And I think it's time for the  
 [21] grand jury to take a break also. So why don't we take ten  
 [22] minutes?  
 [23] MR. WISENBERG: Okay. And we'll come get you when  
 [24] we're ready to begin again.  
 [25] THE WITNESS: Can you repeat the question that

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[1] you've asked me?  
 [2] MS. WISENBERG: Yes, and if the grand jurors can  
 [3] wait just a minute, too, for after the witness leaves.  
 [4] BY MR. WISENBERG:  
 [5] Q Did you ask anybody, direct anybody to find out Mr.  
 [6] Hilley's version of events? And I'll just go ahead and ask  
 [7] the next question, which is, if the answer to that is no, has  
 [8] somebody told you what his version is?  
 [9] I think you've established you haven't talked to  
 [10] him. correct?  
 [11] A I haven't talked to him.  
 [12] Q Okay. And we'll come get you in about 10. 11. 12  
 [13] minutes.  
 [14] A Okay. Can I ask you what you're referring to  
 [15] there? Do I get to ask what you've just told all the grand  
 [16] jurors to --  
 [17] Q I know. You can ask, but --  
 [18] A I can ask, but you don't have to tell me. I  
 [19] understand this process.  
 [20] (A brief recess was taken.)  
 [21] (Witness excused. Witness recalled.)  
 [22] MR. WISENBERG: The witness has reentered the grand  
 [23] jury room. Madam Foreperson, do we have a quorum?  
 [24] THE FOREPERSON: Yes, we do.  
 [25] MR. WISENBERG: Are there any unauthorized persons

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[1] in the grand jury room?  
 [2] THE FOREPERSON: There are none.  
 [3] Mr. Podesta, you are still under oath.  
 [4] THE WITNESS: Thank you.  
 [5] BY MR. WISENBERG:  
 [6] Q Okay. I think we had a couple of questions on the  
 [7] table.  
 [8] A Restate the question, please.  
 [9] Q I was afraid you would say something like that.  
 [10] The first question is, did you ask anybody -- I  
 [11] don't know if it's the first question, but I'll try to get it  
 [12] close as I can. Did you ask anybody to try and find out what  
 [13] Mr. Hilley's memo of this encounter was?  
 [14] A No, I don't think so.  
 [15] Q The other question is, did anybody tell you what  
 [16] Mr. Hilley's version of the encounter was?  
 [17] A Yes.  
 [18] Q Okay. And who was that person?  
 [19] A My lawyer, Mr. Kadzik.  
 [20] Q Okay.  
 [21] A JUROR: Who was it, please?  
 [22] THE WITNESS: Mr. Kadzik. I'm sorry.  
 [23] BY MR. WISENBERG:  
 [24] Q All right. And do you know what -- you certainly  
 [25] have a right to invoke the privilege on that, as to exactly

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[1] what he told you Mr. Hilley's version was. And are you doing  
 [2] so?  
 [3] A Yes.  
 [4] Q Okay. Did you know anything about the efforts of  
 [5] Vernon Jordan to assist Monica Lewinsky in locating any  
 [6] employment?  
 [7] A No. You're talking about before the -- before  
 [8] these events became public.  
 [9] Q Right.  
 [10] A No, I didn't know. I was unaware of that.  
 [11] Q And since it became public. I take it. you only  
 [12] know about it through the press.  
 [13] A That's correct.  
 [14] Q Mr. Jordan hasn't had any conversations with you  
 [15] about it?  
 [16] A No.  
 [17] Q What, if any, knowledge do you have -- let me just  
 [18] say that unless I indicate otherwise, all of my questions  
 [19] exclude what you've learned through the press, through the  
 [20] media, okay?  
 [21] A That's a tall order. but I'll try to answer as best  
 [22] as I can.  
 [23] Q Okay. Just so you're clear, that's my -- in terms  
 [24] of what our question is --  
 [25] A Yeah, I got it.

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[1] Q -- excluding that okay?  
 [2] What if any knowledge did you or do you have of  
 [3] efforts to get a lawyer for Ms. Lewinsky by Mr. Jordan or  
 [4] anyone else?  
 [5] A None. I have no knowledge of that other than what  
 [6] I've read in the papers.  
 [7] Q Okay. Assuming that Mr. Jordan did, as I believe  
 [8] he's publicly stated, helped Ms. Lewinsky get a lawyer for  
 [9] the Paula Jones case and simultaneously with helping her to  
 [10] get a job at Revlon, based on what you know about life and  
 [11] about the White House and about Vernon Jordan, do you  
 [12] consider that unusual, his actions on her behalf unusual,  
 [13] given her relatively low position and his relatively high  
 [14] position?  
 [15] A You've kind of excluded all my knowledge about this  
 [16] topic by the preface, which is all I know about it is what  
 [17] I've read in the newspapers. Some of that's been  
 [18] inconsistent. I obviously don't know what he's testified to.  
 [19] So I really have no basis to judge that.  
 [20] Q Well, just the simple issue of somebody of the  
 [21] magnitude, let's say, and the personality of Vernon Jordan,  
 [22] who's not only helping a relatively low-level person -- and  
 [23] not meaning to criticize her in any way by that -- get a  
 [24] job -- taking some time to do that.  
 [25] I mean, assume that. I assume that my predicates

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[1] are a-rate. And that he got her a lawyer and took her to a  
 [2] lawyer in connection with the Paula Jones case. Do you  
 [3] consider that to be unusual?  
 [4] A Well, I -- as I say, I don't really have a factual  
 [5] basis to -- to comment on that. I don't know what Mr. Jordan  
 [6] has done for other people. I know Mr. Jordan.  
 [7] Q Okay.  
 [8] A I know he helps people. But I know less than what  
 [9] the grand jurors know about -- in order to form an opinion to  
 [10] judge that.  
 [11] Q Okay, I understand. How about -- are you aware of  
 [12] any efforts by anybody to get a lawyer for any other  
 [13] witnesses in the Paula Jones case?  
 [14] A In the Paula Jones case?  
 [15] Q Right.  
 [16] A No, I don't think so.  
 [17] Q You hesitated a little bit. Is there any --  
 [18] A I was just trying to rack my memory. I mean, that  
 [19] goes back three, four years so I was just trying to --  
 [20] Q Do you have any personal knowledge --  
 [21] A -- think of all the possibilities that were there.  
 [22] Q Okay. Sorry I cut you off.  
 [23] Do you have any personal knowledge of any romantic  
 [24] or sexual relationship between the President and Monica  
 [25] Lewinsky?

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[1] A No.  
 [2] Q Have you heard -- again, excluding the press, but  
 [3] pre- or post-scandal --  
 [4] A Right.  
 [5] Q -- have you heard through hearsay, rumor,  
 [6] firsthand -- well, secondhand, third-hand, nineteenth-hand of  
 [7] any such relationship?  
 [8] A I've heard the President deny it.  
 [9] Q Okay. Other than the President's denial, have you  
 [10] heard from anybody that there was such a relationship?  
 [11] A No.  
 [12] Q Have you heard anything from anybody --  
 [13] A Other than the people commenting on television, you  
 [14] know.  
 [15] Q Okay. I consider that to be the press, the media.  
 [16] A Yeah.  
 [17] Q Has anybody said anything to you, before January  
 [18] 21st or after, from which a reasonable person might conclude  
 [19] that there could have been a relationship, physical,  
 [20] romantic, sexual relationship between the President and  
 [21] Monica Lewinsky?  
 [22] A As an example -- just as an example. "I saw them  
 [23] leaving the study together," something like that, where  
 [24] somebody hasn't made the statement to you, but you've heard  
 [25] either secondhand or third-hand of an event that could lead a

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[1] reasonable person to conclude that there might have been a  
 [2] relationship?  
 [3] A Other than what I have read in the press, I know of  
 [4] -- I've heard of virtually nothing factually, other than the  
 [5] President's strong denials personally to me.  
 [6] Q To you.  
 [7] A Yes.  
 [8] Q Okay, all right. Well get to that.  
 [9] A And, I take it, you never saw Ms. Lewinsky alone  
 [10] with the President.  
 [11] A Not to the best of my knowledge.  
 [12] Q Okay. And did you ever see Ms. Lewinsky entering a  
 [13] room where you thought the President was or was going to be?  
 [14] A Well, I think I testified the first time I hardly -  
 [15] - before this event happened, I don't think I would have  
 [16] recognized her. But I think the answer to that question is  
 [17] no.  
 [18] Q Okay.  
 [19] A But I didn't know what she looked like, I didn't  
 [20] know who she was, so --  
 [21] Q Okay. And my question would be broad enough to  
 [22] include somebody who you might not have known at the time,  
 [23] but now you think was Ms. Lewinsky.  
 [24] A Yes. And my answer to that is no.  
 [25] Q Okay. Did you ever see Ms. Lewinsky leave a room

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[1] where the President was or had been?  
 [2] A No.  
 [3] Q Did you ever see the President enter a room where  
 [4] you thought Ms. Lewinsky was or was going to be?  
 [5] A No.  
 [6] Q Did you ever see the President leave a room where  
 [7] you thought Ms. Lewinsky was or had been?  
 [8] A No.  
 [9] Q In light of the publicity that's happened in  
 [10] connection with the scandal, is there anything that seemed  
 [11] insignificant before the scandal that now kind of stands out?  
 [12] A In what sense? I mean --  
 [13] Q Oh, just events that you personally know about with  
 [14] respect to Ms. Lewinsky.  
 [15] A I think the answer to that is no.  
 [16] Q All right. I guess there are events that have  
 [17] taken on new significance.  
 [18] A Yeah, right.  
 [19] Q Right. What you had heard about Evelyn Lieberman,  
 [20] for instance, being involved in Ms. Lewinsky's transfer out  
 [21] of the White House. Is that an example of something that --  
 [22] A Has a different sense now than it did prior?  
 [23] Q Right, okay.  
 [24] A Right.  
 [25] Q You've told us about these three events -- I'll

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[1] call them events -- the discussion with Mr. Bowles where he  
 [2] told you about his discussion with the President. the Betty  
 [3] Currie-William Richardson event --  
 [4] A Mm-hmm.  
 [5] Q -- and the Erskine Bowles-John Hilley event.  
 [6] When the scandal broke did those events concern  
 [7] you when you looked back on those and thought about those,  
 [8] and when you first heard about the story breaking?  
 [9] A Well, when I -- the story sort of broke over the  
 [10] course of three or four days, I guess.  
 [11] Q Okay.  
 [12] A And when I understood that this was a matter under  
 [13] investigation by Mr. Starr, I certainly assumed that there  
 [14] would be questioning of those events, and that I would be  
 [15] sitting here at some point --  
 [16] Q Okay.  
 [17] A -- whether or not it would be today or not.  
 [18] Q All right. We'll kind of get back to this issue  
 [19] later because I'm going to get to the chronology because we  
 [20] got cut off with your Isikoff conversation last time.  
 [21] But let me just jump ahead to this extent. Did Mr.  
 [22] Bowles ever tell you whether or not it was the President who  
 [23] asked -- who was the originator of the John Hilley request?  
 [24] A I don't think he did.  
 [25] Q Okay. Was there an appearance issue at the White

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[1] House when you worked there -- let's just confine ourselves  
 [2] now to the pre-January 21st time frame. And what I mean by  
 [3] that is, were any special measures taken to avoid either the  
 [4] appearance of improprieties in connection with -- and I mean  
 [5] this as just a kind of political issue.  
 [6] Let me start over. Was there an appearance issue  
 [7] in this sense. That you all took special measures to make  
 [8] sure for instance that the President didn't put himself in  
 [9] a situation where there would be rumors about affairs?  
 [10] A I think that with regard to any conduct we had in  
 [11] the White House, that was pretty far from our imagination.  
 [12] Q Okay.  
 [13] A So I don't -- if there were -- I don't recall  
 [14] having any special procedures established.  
 [15] Q Okay. I want to make very dear --  
 [16] A I mean, I think that there was -- there was  
 [17] obviously -- I'm inflating some things, but that we had the  
 [18] issue of the congressional hearings on campaign finance from  
 [19] 19 -- the hearings occurred in 1997 about events in 1996, and  
 [20] we instituted a new and enhanced vetting procedure to see who  
 [21] was coming in to see the President, whether it would be  
 [22] appropriate for them to see him.  
 [23] Now that could go to the question you asked me.  
 [24] Q Right. I'm talking about like a Gennifer Flowers  
 [25] type issue, and I want to make very clear I'm not interested

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[1] in whether or not you all thought that was a real substantive  
 [2] issue. I don't care about that.  
 [3] A Right.  
 [4] Q What I'm getting at -- you know sometimes you have  
 [5] to worry about appearances, even if something isn't  
 [6] necessarily true. And so I'm saying, as deputy chief of  
 [7] staff, was that something you all were concerned about when  
 [8] you were deputy chief of staff there at the White House,  
 [9] not putting the President in a situation when, there would  
 [10] even be rumors of impropriety?  
 [11] A I must say I don't think, in my recollection, it  
 [12] really came up.  
 [13] Q Okay.  
 [14] A And I don't think we had any special procedures for  
 [15] that. I mean, obviously there are -- you know, the  
 [16] President is a public figure. There are all kinds of  
 [17] political judgments one makes about that. But not in the  
 [18] context that you're talking about.  
 [19] Q Okay. Do you recall participating in any  
 [20] discussions regarding Jones v. Clinton?  
 [21] A Yes.  
 [22] Q All right. What kinds of discussions were they?  
 [23] A I had a couple of conversations with Mr. Bennett  
 [24] that were confined really to the timing of the case --  
 [25] Q Okay.

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[1] A -- that I had with him in order to have -just in  
 [2] order to be able to plan our schedule.  
 [3] Q All right. Those were just **scheduling** as opposed  
 [4] to political -- partly political discussions, in terms of  
 [5] timing?  
 [6] A I think there were scheduling discussions. I mean,  
 [7] I guess, you know, I don't -- I'm not drawing a distinction  
 [8] there, but I think there were scheduling discussions. I  
 [9] mean, we had to know if there was a trial, when was the trial  
 [10] going to happen, et cetera, et cetera.  
 [11] Q Okay. No substantive discussion about the merits  
 [12] of the case in those discussions?  
 [13] A Not in those discussions.  
 [14] Q Okay. And you say you think a couple of times?  
 [15] A Yeah, over -- by telephone.  
 [16] Q All right. Who else did you have discussions with  
 [17] about Jones v. Clinton?  
 [18] A There was -- I recall at least one occasion when  
 [19] Mr. Bennett was going on television. I think that was  
 [20] subsequent -- I'm sure it was subsequent to the Lewinsky  
 [21] matter. And we had a briefing in your will a ~~briefing~~  
 [22] session with Bennett at the White House that lasted for 20  
 [23] minutes or so.  
 [24] Q Okay. To prep him. in other words.  
 [25] A To prep him for going on TV.

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[1] Q Moot court, so to speak.  
 [2] A Moot court, right. Moot TV.  
 [3] Q All right.  
 [4] A So he was on -- I don't know -- it was one of the  
 [5] Sunday shows, or he was going on some show, and we had a  
 [6] round of what questions we expected him to get, because all  
 [7] those questions were coming to the White House --  
 [8] Q Okay.  
 [9] A -- and what his expected answers were.  
 [10] Q Any other discussions concerning Jones v. Clinton  
 [11] that you recall having with anybody?  
 [12] A Yes.  
 [13] Q All right. Tell us about that.  
 [14] A I had a single discussion about settlement of the  
 [15] case in the summer of '97.  
 [16] Q Okay. Tell us about that. Who had it with and --  
 [17] A I'm not going to go very far on this, but --  
 [18] Q Okay.  
 [19] A The participants were Mr. Bennett, Mr. Lindsey, Mr.  
 [20] Ruff, myself, and the President.  
 [21] Q Okay.  
 [22] A The topic was settlement of the Jones lawsuit.  
 [23] Q Okay.  
 [24] A To put this in some time perspective, that was  
 [25] prior to her switching lawyers.

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[1] Q Okay. What was the substance of the discussion?  
 [2] A That is where I need to stop because I've been  
 [3] instructed by White House counsel that that's a privileged  
 [4] conversation.  
 [5] Q Okay. Privileged in -what privilege?  
 [6] A Attorney-client.  
 [7] Q Okay. Even though you're not operating as a --  
 [8] well, let me change that to a non-leading question, even  
 [9] though I don't have to.  
 [10] My understanding is you have a -- you're deputy  
 [11] chief of staff. You are not employed as a lawyer at the  
 [12] White House; is that correct?  
 [13] A I mean, I'm a senior adviser to the President. I  
 [14] give him advice.  
 [15] Q Okay. You're not in the Counsel's Office.  
 [16] A But I'm not in the Counsel's Office.  
 [17] Q Okay.  
 [18] A The counsel does at some level report to me --  
 [19] Q Okay.  
 [20] A -to the President.  
 [21] Q All right. So the White House has instructed you  
 [22] to assert attorney-client privilege.  
 [23] A That's correct.  
 [24] Q Okay. And you won't answer any questions beyond  
 [25] the general subject matter that you've given us.

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[1] A That's correct.  
 [2] Q Well let me just ask you some questions in case it  
 [3] needs to be set up for litigation.  
 [4] Q Okay.  
 [5] Q And that is, was Kathleen Willey discussed at all  
 [6] during this meeting?  
 [7] A I think I can't get into the substance of this  
 [8] conversation.  
 [9] Q Okay. So also with respect to that specific  
 [10] question, since that's within the substance, you are  
 [11] asserting at the instruction of the White House attorney-  
 [12] client privilege.  
 [13] A Right.  
 [14] Q Okay. Can you tell us -- can you enlighten us  
 [15] which attorney-client privilege, a government attorney-client  
 [16] privilege or a personal attorney-client privilege?  
 [17] A I need to go check on that.  
 [18] Q Okay. Why don't we hold that in abeyance --  
 [19] A Okay.  
 [20] Q -- and then right before we quit, we'll have you go  
 [21] out and see if you can articulate which. Because, as you  
 [22] know, you may or may not know the different --  
 [23] A Right.  
 [24] Q -- shades and variations.  
 [25] Okay. Any other discussions about Jones v.

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[1] Clinton? I take it, one since your discussion with Isikoff  
 [2] had something to do with that, that you talked about --  
 [3] A Oh, right.  
 [4] Q Okay. All right. So let's leave aside Isikoff  
 [5] because you had hung up on him when we left.  
 [6] A You've jogged my memory which is that I had  
 [7] another conversation with Isikoff in the summer of '97.  
 [8] Q Okay. Tell us about that.  
 [9] A I teach a class at Georgetown Law School. I had  
 [10] asked Mr. Isikoff, who I know -- I mean, I would not describe  
 [11] Mr. Isikoff as a friend of mine, but I know him -- to come to  
 [12] my class, and the class is on congressional investigations as  
 [13] opposed to independent counsel investigations, and to  
 [14] describe -- the students have quite an interest in how  
 [15] reporters work and what they look for.  
 [16] I had asked Mr. Isikoff if he would -- he was  
 [17] fairly well-known to the class, and even though I viewed him  
 [18] as something of an adversary of mine, we have a respectful, I  
 [19] guess, relationship. So I had asked him to come.  
 [20] At that time the notorious Matt Drudge -- this was  
 [21] kind of contemporaneous with that -- wrote something on his  
 [22] Website or Internet site, whatever he does -- that said that  
 [23] Isikoff was working on another story, which I think turned  
 [24] out to be story about Ms. Willey which ran a couple weeks  
 [25] later, about a woman who makes a claim about the President.

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[1] And I don't remember the details of -- but that it was  
 [2] related to the Jones case.  
 [3] And that -- and I don't remember the details of  
 [4] what was on the Drudge Report, but there was something on the  
 [5] Drudge Report, and that the story was going to come out in  
 [6] the Newsweek issue that came out on Sunday or Monday,  
 [7] whenever -- it usually comes out on Monday morning.  
 [8] He was scheduled to come to my class that  
 [9] afternoon. I called him on a Friday, as I recall, and this  
 [10] was -- the Drudge thing was coming out three or four days  
 [11] earlier -- and said, "I don't want to be embarrassed by this.  
 [12] If you're writing a story about this that's coming out on  
 [13] Monday, I don't think I want you to come to my class and have  
 [14] to deal with why were you in my class on Monday after you  
 [15] wrote the story."  
 [16] He said, "It's not in the magazine." So he came to  
 [17] my class. I don't think we really talked about it. I don't  
 [18] specifically remember it.  
 [19] Q Okay.  
 [20] A And then we kind of moved on. And then about two  
 [21] weeks after that, I think, something in that time frame, he  
 [22] did, in fact, write the Willey story with -- and, you know, I  
 [23] know that you've heard from Ms. Steele because I happened to  
 [24] be in the hallway when she was here last time.  
 [25] Q So you think it was post -- you know he was at your

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[1] class --  
 [2] A It was kind of in the middle of July.  
 [3] Q Okay, pm-Newsweek publication, but you think post-  
 [4] Drudge. or just you had heard --  
 [5] A It was post-Drudge.  
 [6] Q Okay.  
 [7] A Because what prompted me was, there was something  
 [8] on the Drudge Report that made me call him.  
 [9] Q Okay. All right. Any other conversations with  
 [10] anybody that you had on the Jones v. Clinton?  
 [11] A I don't recall having any other substantive  
 [12] conversations. I mean, there were obviously kind of, you  
 [13] know, passing press interest that may have come up in the --  
 [14] in conversations around the White House, you know, what --  
 [15] how is this going to play out, what's going to happen, how --  
 [16] you know, we were looking at a trial.  
 [17] I had conversations about whether the press pool  
 [18] should go with the motorcade to Mr. Bennett's office on the  
 [19] deposition, but I wouldn't describe any of those as  
 [20] substantive conversations about the case.  
 [21] Q Okay. On the conversations that you're  
 [22] invoking attorney-client privilege on, did you ever discuss  
 [23] Linda Tripp with anybody?  
 [24] A Yes.  
 [25] Q Okay. Tell us about that.

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[1] A Well, Linda Tripp worked at the White House in an  
 [2] office that actually at some level reported to me starting in  
 [3] 1993 when I had a different job.  
 [4] Q Okay.  
 [5] A And when Mr. Nussbaum wanted her -- I mean, you  
 [6] want to go back this far?  
 [7] A I don't think so.  
 [8] A You asked me a very per n-ended conversation.  
 [9] Q Yes. Let me rephrase the question. Did you have  
 [10] any conversations about Ms. Tripp since you came back to the  
 [11] White House a second time, up until January 21st?  
 [12] A I don't think so. I don't think -- I don't think  
 [13] so. I think she was kind of floating around in this Willey  
 [14] story --  
 [15] Q Okay.  
 [16] A -- but I don't remember talking to anybody about  
 [17] that.  
 [18] Q Okay.  
 [19] A And that precedes that. That's sometime early on.  
 [20] It started like July.  
 [21] Q Okay. Did you discuss any affidavits of witnesses,  
 [22] ever have any discussion about affidavits of witnesses in the  
 [23] Jones case, ones v. Clinton case?  
 [24] A Yeah.  
 [25] Q Tell us about that.

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[1] A I need to talk to my lawyer.  
 [2] Q Sure.  
 [3] A Okay.  
 [4] Q Why don't you -- when you're ready to come back,  
 [5] knock and wait for somebody to open the door, okay?  
 [6] (Witness excused. Witness recalled.)  
 [7] MR. WISENBERG: Let the record reflect that the  
 [8] witness has reentered the grand jury room. And we have a  
 [9] quorum, don't we, Madam. Foreperson?  
 [10] THE FOREPERSON: Yes, we do.  
 [11] MR. WISENBERG: No unauthorized people present,  
 [12] correct?  
 [13] THE FOREPERSON: Not a one.  
 [14] MR. WISENBERG: Okay.  
 [15] THE FOREPERSON: Mr. Podesta, you're still under  
 [16] oath.  
 [17] BY MR. WISENBERG:  
 [18] Q Okay. I had asked you the affidavit question  
 [19] A You did.  
 [20] Q Tell us about that.  
 [21] A Very early in the Jones case, I recall that Mr.  
 [22] Bennett had said to me that they had a good affidavit -- I  
 [23] don't know what the substance of it was -- from one of the  
 [24] troopers.  
 [25] Q Okay. Did he say why it was good?

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[1] A No. I mean, I think -- it was not a substantive  
 [2] conversation. I wouldn't describe it as a substantive  
 [3] conversation.  
 [4] Q Okay. And that's it? That's the only conversation  
 [5] you recall about an affidavit?  
 [6] A Mm-hmm.  
 [7] Q That's a yes?  
 [8] A Yeah, that's a yes.  
 [9] Q Okay.  
 [10] A Yeah, I don't recall any other conversation about  
 [11] affidavits. This is very early. This must have been in '94,  
 [12] and your questions jogged my memory.  
 [13] Q Okay. Can you enlighten us about the precise  
 [14] attorney-client privilege you're claiming on that previous  
 [15] question?  
 [16] A M lawyer's checking.  
 [17] Q day. Did you have any discussion about -- do you  
 [18] recall having any discussion about any motion to quash filed  
 [19] by Kathleen Willey?  
 [20] A No.  
 [21] Q What, if any, role did you play in kind of any  
 [22] political prepping or prepping of any kind of the President  
 [23] for his deposition?  
 [24] A None.  
 [25] Q Okay. For anyone else in their depositions in the

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[1] case?  
 [2] A Not at all.  
 [3] Q Okay. Were you involved at all in how to handle  
 [4] that case as a media issue, Jones v. Clinton?  
 [5] A Only -- only, as I say, insofar as we were trying to  
 [6] do our job and do other things other than dealing with Paula  
 [7] Jones.  
 [8] Q Okay. It would come up from time to time as a  
 [9] topic?  
 [10] A I think it would -- yeah, it would come up from  
 [11] time to time as a topic. But I think what we attempted -- I  
 [12] mean, I think the only context in which we were dealing with  
 [13] it was that we were making sure we were trying to get  
 [14] something done in the White House and trying the Jones  
 [15] matter was handled by Mr. Bennett, and we didn't kind of  
 [16] bleed into that.  
 [17] Q Okay, as a substantive matter.  
 [18] A As a substantive matter.  
 [19] Q But sometimes you had to deal with its effect on  
 [20] other things.  
 [21] A That's correct.  
 [22] Q Either as a matter of scheduling or as a matter of  
 [23] media relations?  
 [24] A Mostly the former. I don't -- I didn't -- I mean,  
 [25] I talked to reporters from time to time, but not -- not that

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[1] often. That was mostly McCurry's job.  
 [2] Q Did you ever urge as part of your advisory duties  
 [3] that the case be settled?  
 [4] A I think that goes to the substance of the  
 [5] conversations that we talked about.  
 [6] Q Okay, all right. Other than in that meeting, if  
 [7] you can answer it, just in terms of your job as deputy chief  
 [8] of Staff?  
 [9] A I mean, I had a view about that, but I don't  
 [10] remember expressing it other than -- other than -- you know,  
 [11] if we take that meeting out of it, I don't remember  
 [12] expressing that view.  
 [13] Q Okay. What was that view? Again, I'm not  
 [14] interested in the expression in the meeting. Did you think  
 [15] it should be settled?  
 [16] A Did I think it should be settled? I thought that  
 [17] there was -- I thought there was -- I didn't think it should  
 [18] be settled at any price. I was aware that the President, you  
 [19] know, thought that this whole thing was unfair, but I thought  
 [20] that there was potential damage from continuing the case.  
 [21] Q Okay. I think you testified that on the day of the  
 [22] President's deposition, January 17, 1998, you were preparing  
 [23] for the State of the Union Address, is that correct, doing  
 [24] some work in connection with the upcoming --  
 [25] A Give me the date?

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[1] Q Saturday, January 7, 1998.  
 [2] A Yes. The day of the deposition.  
 [3] Q Right.  
 [4] A Yeah, yes.  
 [5] Q And where exactly were you doing that?  
 [6] A In the Roosevelt Room, which is in the center of  
 [7] the West Wing of the White House.  
 [8] MR. WISENBERG: Does anybody care to see any maps?  
 [9] JURORS: No.  
 [10] A JUROR: We know exactly where it is.  
 [11] BY MR. WISENBERG:  
 [12] Q Did you see the President before he left for the  
 [13] deposition that day?  
 [14] A No.  
 [15] Q Okay. Where were you when the President returned.  
 [16] if you know?  
 [17] A I was in the West Wing.  
 [18] Q All right. Did you know when he returned?  
 [19] A No, no precisely.  
 [20] Q Okay. I believe you were telling us about the  
 [21] Isikoff call, and that was going on, I take it, while he was  
 [22] at the deposition; is that correct?  
 [23] A Yes.  
 [24] Q Lets go back to the sequence we left off at when  
 [25] you were here last time. You talked to Mr. Isikoff, he

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[1] mentions the name, Monica Lewinsky to you at some point in  
 [2] the conversation.  
 [3] A Right.  
 [4] Q Then you end the conversation. Before I ask you  
 [5] what happened next, I'm going to ask you, what did you think  
 [6] when you heard -- you're hearing about this big story. I  
 [7] think you told us last time to the effect that you first  
 [8] heard about it on Saturday, but you subsequently learned that  
 [9] some of the calls had been coming in since Friday.  
 [10] A Right, from Time magazine, not from Newsweek.  
 [11] Q Okay. And then you call Isikoff, who you know and  
 [12] he mentions -- I think you said you asked him, do you have a  
 [13] Starr -- Ken Starr and/or a grand jury story? And he said,  
 [14] "No, it's a Paula Jones story," and he mentions Monica at  
 [15] some point.  
 [16] A Right.  
 [17] Q Is that --  
 [18] A I think the information that we had all garbled up  
 [19] was --  
 [20] Q Okay.  
 [21] A --that it had something to do with tapes and  
 [22] something to do with grand jury and had something to do with  
 [23] Starr.  
 [24] Q Okay. He tells you that it's a Jones story, and he  
 [25] asks you about if you know anything about Monica Lewinsky; is

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[1] that correct?  
 [2] A That's correct.  
 [3] Q And what did you tell him that you knew about  
 [4] Monica Lewinsky?  
 [5] A He asked me whether I knew her. I told him I  
 [6] didn't know her, I don't know her. And he said, Have you  
 [7] ever met her? And I said I'd met her briefly once at a  
 [8] funeral.  
 [9] Q All right.  
 [10] A And he said, Whose funeral? And I said, It's  
 [11] nobody you would know.  
 [12] Q Right, right. Now, you get off the phone. Are you  
 [13] thinking --do you realize well, it's obvious from your  
 [14] questions you realize who Monica Lewinsky is. You don't have  
 [15] to be prompted any more than him just askwg. correct?  
 [16] A That's correct.  
 [17] Q Because from your testimony I think it was just  
 [18] about three days before when you got this request from Mr.  
 [19] Bowles, correct?  
 [20] A That's correct.  
 [21] Q All right. Did this concern you, worry you, set  
 [22] off alarm bells?  
 [23] A It concerned me.  
 [24] Q Okay. And how come?  
 [25] A Well, he was now linking, for the first time in my

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[1] mind, Monica Lewinsky to the Paula Jones matter.  
 [2] Q All right. What did you do -- what did you do  
 [3] after you talked to him?  
 [4] A I went and saw Ms. Mills in her office.  
 [5] Q Okay. Tell us about that conversation.  
 [6] A I went upstairs -- I had previously talked to Ms.  
 [7] Mills and asked whether she knew anything about the Time  
 [8] Magazine reports. And so I went back to her and I said, I  
 [9] talked to Isikoff, and that he said he wasn't working on a  
 [10] matter having to do with the grand jury or Ken Starr -- I'll  
 [11] leave it to you about his veracity -- "and he was working on  
 [12] a Paula Jones matter that involved Monica Lewinsky."  
 [13] That he was trying to get Bennett -- that was the  
 [14] other part of the conversation -- that he was trying to get  
 [15] Bennett for a reaction. And that he couldn't get Bennett,  
 [16] and could I help him get Bennett to react to the story.  
 [17] I basically just reported that to Ms. Mills, that  
 [18] this was a Paula Jones, not a Ken Starr story, that he wanted  
 [19] to talk to Bennett, and that he had raised a woman named  
 [20] Monica Lewinsky.  
 [21] Q Okay. And what did Ms. Mills say in response?  
 [22] A She said that she would contact -- I think she said  
 [23] she would contact Bruce Lindsey, who was with -- at the  
 [24] Bennett law firm where the deposition was taking place and  
 [25] let him know that that's what was going on. and that he would

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[1] talk to Bennett about how to respond to Isikoff.  
 [2] Q Okay. So she indicated she was going to try to  
 [3] contact him while they're at the deposition, Mr. Lindsey,  
 [4] that is.  
 [5] A Correct.  
 [6] MR. WISENBERG: I'm sorry?  
 [7] A JUROR: I'm sorry. Do you recall what time that  
 [8] was?  
 [9] THE WITNESS: It was probably mid-morning, 10:30,  
 [10] maybe, on Saturday.  
 [11] A JUROR: Thank you.  
 [12] BY MR. WISENBERG:  
 [13] Q Do you know whether or not she did contact Mr.  
 [14] Lindsey, get hold of him?  
 [15] A Yes.  
 [16] Q All right. And did she?  
 [17] A Yes, she did.  
 [18] Q Okay. And how do you know that?  
 [19] A She was -- I think she talked to him on the phone  
 [20] when I was there and just basically said what I said yes.  
 [21] Q Okay. Did she tell you what Mr. Lindsey told her  
 [22] in response?  
 [23] A That was, I think, kind of a one-way conversation.  
 [24] Q Okay. But after it was over did she tell you --  
 [25] did she relay anything that Mr. Lindsey had told her?

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[1] A No.  
 [2] Q Did you team later at a subsequent time what stage  
 [3] of the Presidents deposition -- what stage the deposition  
 [4] was in?  
 [5] A No. No, I don't know -- when she contacted him, I  
 [6] don't know what stage the deposition was in.  
 [7] Q Okay. And as an example, do you know or have you  
 [8] learned whether or not -- assuming that he was asked  
 [9] questions about Ms. Lewinsky at the deposition, whether or  
 [10] not those had already been asked?  
 [11] A I don't know the answer to that.  
 [12] Q Okay. Did Ms. Mills appear to be concerned either  
 [13] after you relayed the information to her or after she spoke  
 [14] to Mr. Lindsey?  
 [15] A Ms. Mills is pretty poker-faced, so she never seems  
 [16] concerned. So --  
 [17] Q Okay. All right. What happened next? I take it  
 [18] we're entering into a period of --  
 [19] A She -- I mean, she took the information. she passed  
 [20] it along, and that was it.  
 [21] Q Okay. All right. What did you do next?  
 [22] A I went back to my meeting, tried to work on the  
 [23] State of the Union.  
 [24] Q Okay. When did you next hear anything related to  
 [25] the Monica Lewinsky matter?

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[1] A Later that afternoon.  
 [2] Q And what did you hear?  
 [3] A I don't remember the sequence, but I talked to Mr.  
 [4] Isikoff once more and I talked to Mr. Lindsey.  
 [5] Q All right. Tell us about those conversations.  
 [6] A And they were about the same time, late in the  
 [7] : afternoon --  
 [8] Q All right.  
 [9] A -- and don't remember which was first.  
 [10] Mr. Isikoff called me back, as I recall, to say  
 [11] they weren't running a story.  
 [12] Q Okay.  
 [13] A And I said, "Fine." You know, it was like a -- he  
 [14] just said that, "We aren't running a story."  
 [15] Q There was no substance to the conversation, other  
 [16] than, "We're not going to run a story."  
 [17] A He -- yeah. He said to me, "We're not going to run  
 [18] the story you asked me about."  
 [19] Q Okay.  
 [20] A He said to me, "I said, 'The story I asked you  
 [21] about was Ken Starr and the grand jury and tapes.' And he  
 [22] said, 'No, the story I told you about.' And I said, 'Fine.'"  
 [23] Q Okay.  
 [24] A I didn't want to engage with him, and I didn't  
 [25] engage with him --

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[1] Q Okay.  
 [2] A -- and I just took that information.  
 [3] Q He didn't ask you any further questions?  
 [4] A No, not that I recall.  
 [5] Q And what did you --  
 [6] A I don't know why he made that -- I recall that he  
 [7] called me.  
 [8] Q Okay.  
 [9] A I don't know why he felt the need to do that.  
 [10] Q Then tell us about the Lindsey conversation.  
 [11] A I saw Mr. Lindsey in the West Wing, I think in his  
 [12] office. I can't be precise about that.  
 [13] Q All right.  
 [14] A It was after the deposition. I said to him --  
 [15] this, again, was a fairly brief conversation -- and I said to  
 [16] him, "How did it go?" He said, "Fine. They asked -- they  
 [17] did ask him about -- they asked him about Monica Lewinsky."  
 [18] Q Okay.  
 [19] A He said to me, "And I said, 'What did they ask  
 [20] him?' And he said, 'I don't know. I wasn't in the room.'"  
 [21] Q Okay.  
 [22] A But he knew that they had asked him  
 [23] Q All right. Did he indicate he knew anything about  
 [24] Monica Lewinsky or who she was?  
 [25] A We didn't have a substantive conversation about

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[1] this.  
 [2] Q Okay. Any reason why not?  
 [3] A I think at that point I didn't want to team  
 [4] anything more than I already knew --  
 [5] Q And, of course --  
 [6] A -- or we'd be there all night.  
 [7] Q Of course, by then he knew -- by then you've  
 [8] already had this conversation where you're relating to Cheryl  
 [9] Mills the original Isikoff conversation, so -- and then he's  
 [10] kind of doing that -- not confirming, but saying they  
 [11] did ask about Monica Lewinsky.  
 [12] A That the Jones lawyers asked about Monica Lewinsky.  
 [13] Q Right, right. Had you during the meantime let  
 [14] anybody know up to this point time about these events  
 [15] concerning Monica Lewinsky that you've told us about, the  
 [16] things that you're connected with?  
 [17] A I don't think so. I don't think I had a  
 [18] conversation with -- the only person I might have said  
 [19] something to is Ms. Mills, but I don't think I did.  
 [20] Q Okay. Did Ms. Mills indicate to you up to this  
 [21] point in time that she knew anything about Ms. Lewinsky?  
 [22] A No.  
 [23] Q I had a question, but it's escaped me now.  
 [24] Had you spoken up to this point in time with Mrs.  
 [25] Currie?

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[1] A No.  
 [2] Q All right. Do you recall if she was even there  
 [3] that day?  
 [4] A I don't recall. If I could -- let me restate that  
 [5] answer. I don't know whether she was there that day.  
 [6] Q Okay. You had not spoken to her up until that  
 [7] time.  
 [8] A I didn't speak to her that day.  
 [9] Q Okay.  
 [10] A And I don't know whether she was in the White House  
 [11] or not.  
 [12] Q Okay. What, if anything, did you know -- by the  
 [13] time of the second conversation with Isikoff, what if  
 [14] anything, did you know about Isikoff having placed a phone  
 [15] call to Betty Currie a day or two before, asking her some  
 [16] questions about Monica Lewinsky?  
 [17] A I don't think I knew anything about that.  
 [18] Q Did you ever know anything about that?  
 [19] A I don't think so.  
 [20] Q Okay. What, if anything, had you heard about Mrs.  
 [21] Currie going to visit Vernon Jordan related to Monica  
 [22] Lewinsky?  
 [23] A Nothing.  
 [24] Q And what have you heard since then?  
 [25] A I don't even think I've read that in the press.

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[1] Q Okay. So you can't enlighten us on that event?  
 [2] A No.  
 [3] Q Or on an alleged or possible Isikoff phone call to  
 [4] Mrs. Currie.  
 [5] A No.  
 [6] Q Okay. What next? You talked to Bruce Lindsey  
 [7] sometime: the afternoon after the deposition.  
 [8] Right.  
 [9] Q & at your next interaction with the Monica  
 [10] Lewinsky matter?  
 [11] A The next morning.  
 [12] Q All right. Tell us about that. Let me, before you  
 [13] do that -- did you talk to the President at all that day  
 [14] after he got back from the depo?  
 [15] A No.  
 [16] Q Okay. So what happens then the next day, Sunday,  
 [17] the 18th?  
 [18] A I got a call at home fairly early in the morning  
 [19] from Mr. Stephanopoulos.  
 [20] Q Okay. And how do you define "fairly early" for us?  
 [21] A 9:00.  
 [22] Q Okay.  
 [23] A But it's Sunday morning, so it was fairly early.  
 [24] Q He is not at the White House anymore, correct?  
 [25] A He's now -- he was -- you know, he had left the

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[1] White House --  
 [2] Q Okay.  
 [3] A -- he was about to go on the ABC show where he's  
 [4] a --  
 [5] Q This Week or something?  
 [6] A Yeah This Week. He's regular on a Sunday show.  
 [7] He has a contract with ABC.  
 [8] Q Okay. Tell us about that conversation.  
 [9] A He said, "Have you seen what's on the Drudge  
 [10] Report?" I said, "No." He said -- he said, "Well, let me  
 [11] read it to you." Or I think he said -- maybe he  
 [12] characterized it. I don't know -- I don't think -- I'm not  
 [13] sure he had it --  
 [14] Q Okay.  
 [15] A -- but he had heard it. I can't remember  
 [16] specifically the conversation.  
 [17] But that there was a Drudge Report that had come  
 [18] out the night before, I think, or maybe early in the morning.  
 [19] That said that Isikoff was working on a story. I don't  
 [20] remember whether it named her or not, but that it was a, you  
 [21] know, Paula Jones story, a scandal, intern, White House, sex  
 [22] you know --  
 [23] Q All right.  
 [24] A -- the Gestalt, you know. So, What should I say  
 [25] about this?"

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[1] Q All right. And he's asking you. "What should J say  
[2] about this?"  
[3] A What do you know? How am I going to react to this  
[4] if this comes up on the show?"  
[5] Q So you don't recall at this point whether this  
[6] early Drudge -- this is the first mention of the Drudge  
[7] Report on the Lewinsky matter that you can recall, this  
[8] Stephanopoulos conversation, correct?  
[9] A That's the first that I can recall. It's the first  
[10] mention. I do recall this and it's the first mention.  
[11] Q All right. And whether or not that report  
[12] mentioned Lewinsky, is it fair to say that you thought that  
[13] it was about Lewinsky, that it mentioned an intern or  
[14] whatever?  
[15] A Yeah.  
[16] Q Okay. What did you tell him to say?  
[17] A I said -- I said that -- I think I told him I'd by  
[18] to get Cheryl to call him.  
[19] Q All right.  
[20] A I'm not sure I accomplished that. I don't think I  
[21] did. I -- you know, that I hadn't seen the report, I  
[22] couldn't give him any factual, you know, response to it, and  
[23] just say -- "The only way you can respond to it is to say  
[24] this is Drudge, he's a rumor-monger, doesn't know anything  
[25] about the details of this, and you can't believe what you

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[1] scandal?  
[2] A That's correct.  
[3] Q Because -- why? You don't do that kind of stuff,  
[4] or because you already realized your potential as a witness?  
[5] A No, because I thought of this as kind of a Jones  
[6] matter --  
[7] Q Okay.  
[8] A -- which we basically had been pretty good about  
[9] keeping in Mr. Bennett's office and out of the White House.  
[10] Q Okay. What happens next in terms of your  
[11] interaction with this event?  
[12] A I don't think anything else happened on Sunday.  
[13] Q All right.  
[14] A I think Ms. Mills was going to follow up with Mr.  
[15] Bennett. And I don't think there were stories that were --  
[16] there were no stories. I think, written off of this.  
[17] Q What, if anything, is the buzz around the White  
[18] House? I mean, is there growing concern about this among the  
[19] people who were there on Sunday?  
[20] A Well, first, nobody was there -- I mean, I wasn't  
[21] there on Sunday.  
[22] Q You were called at home.  
[23] A I was called at home.  
[24] Q Did you go into the White House that day?  
[25] A I don't think so.

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[1] read in the Drudge Report."  
[2] Q Okay. And did he say something to that effect?  
[3] A I don't know.  
[4] Q Okay. What else did he say to you?  
[5] A I do recall it was raised the show by the  
[6] conservative guy, who said, you know, "This is the new  
[7] allegation against the President."  
[8] Q Okay.  
[9] A I forgot. I'm blanking on his name.  
[10] Q What else did Mr. Stephanopoulos say? I mean, he  
[11] alerted you to this, he asked you what to say. Did he have  
[12] any other comments for you about this?  
[13] A This was like going on -- "I have to walk out and  
[14] sit in front of camera. What should I say about it?" I had  
[15] a quick conversation. I said, "Let me see if I can find out  
[16] something to say from Ms. Mills."  
[17] You know, there were -- again, this was not -- the  
[18] Jones core issue case, et cetera, didn't much come into our  
[19] side of the White House yet.  
[20] Q You weren't an expert on that.  
[21] A I was not an expert on it.  
[22] Q Okay. What did you do next?  
[23] A I think I tried to get Ms. Mills, and I don't think  
[24] I talked to her till later in the morning.  
[25] Q All right. What else did you do after you were

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[1] Q All right. Did anyone tell you not to go into the  
[2] White House that day?  
[3] A No.  
[4] Q Okay. Do you usually go into the White House on  
[5] Sunday?  
[6] A I usually don't go to the white House on Sunday.  
[7] It's usually my one day I stay home.  
[8] Q Okay. Then that takes us to -- let me ask you  
[9] this. At some point in time during this time period between  
[10] the date of the deposition and The Washington Post story --  
[11] that would be January 17th through 21st --  
[12] A Mm-hmm.  
[13] -- did somebody tell you that Mr. Jordan had been  
[14] trying to get employment for Ms. Lewinsky?  
[15] A I don't think so. I think I learned about that --  
[16] well, I think I teamed about that the day before The Post  
[17] story from The Post reporters.  
[18] Q Okay. Not from anybody in the White House.  
[19] A Correct.  
[20] Q All right. Do you know whether or not -- have you  
[21] learned at any time whether or not Mr. Lindsey knew that Mr.  
[22] Jordan had been trying to get a job for Ms. Lewinsky?  
[23] A If I understood the question right, it was did I  
[24] know that Mr. Lindsey knew that Mr. Jordan was trying to get  
[25] her a job?

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[1] unable to reach Ms. Mills?  
[2] A I don't know that I did anything.  
[3] Q Okay.  
[4] A I mean, I might have watched the show.  
[5] Q All right. What did you do -- I'm interested in on  
[6] that day, as sequentially as you can get it for us, what you  
[7] did related to what looks like it's a burgeoning scandal at  
[8] this point in time, what you did in relation to that.  
[9] A I think I might have talked to -- I may have called  
[10] Mr. Emanuel. I think I talked to Mr. Emanuel.  
[11] Q Okay. Around when?  
[12] A In the morning.  
[13] Q Okay.  
[14] A I mean, I thought it was -- I mean, the Drudge  
[15] Report's not like -- things don't generally go from the  
[16] Drudge Report to the front page of The Washington Post,  
[17] although sometimes they do.  
[18] Q Right.  
[19] A And this was certainly sensational enough that I  
[20] guess it had the potential for that. So I think I alerted  
[21] Mr. Emanuel to that, and I think we concluded that whatever  
[22] was going to happen, Mr. Bennett needed to deal with it, and  
[23] Ms. Mills was getting in touch with Mr. Bennett.  
[24] Q Okay. You're not anticipating at this time that  
[25] you're going to be a primary person dealing with this

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[1] Q Well, have you learned at any time that Mr.  
[2] Lindsey, let's say -- let's assume you're coned and the  
[3] Drudge story broke in the early morning hours of the 18th.  
[4] A Right.  
[5] Q That prior to that time -- have you learned at any  
[6] time that prior to the 18th Mr. Lindsey knew Mr. Jordan was  
[7] trying to get a job -- trying to help Ms. Lewinsky get a job?  
[8] A I don't --  
[9] Q No?  
[10] A I don't understand -- I think the answer to that is  
[11] no.  
[12] Q All right.  
[13] A I don't recall hearing that Mr. Lindsey knew that  
[14] Mr. Jordan was trying to get a job -- I mean, Mr. Lindsey has  
[15] to know because it's been in every newspaper in America.  
[16] Q Right. That's why I said before we even got on  
[17] Drudge --  
[18] A I don't think so.  
[19] Q Okay. And how about Ms. Mills? Same question for  
[20] Ms. Mills.  
[21] A I didn't place Mr. Jordan in this story, so I don't  
[22] think -- think that.  
[23] Q But he got placed as soon as it broke.  
[24] A By The Post. At least I knew about it from The  
[25] Post on the Tuesday.

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[1] Cl Assuming that somebody has told investigators --  
 [2] **this is a hypothetical --**  
 [3] A Okay.  
 [4] Q -- quasi-hypothetical. Assuming ~~that~~ somebody has  
 [5] told investigators that it was no secret in the White House  
 [6] or in certain parts of the White House that Mr. Jordan was  
 [7] looking for a job for Ms. Lewinsky, is that something you're  
 [8] in a position to affirm, deny, or just can't speak to?  
 [9] A I wasn't aware of it.  
 [10] Q Okay.  
 [11] A So I don't know what it means to not be a secret.  
 [12] Cl All right. Have you subsequently learned that  
 [13] anyone was aware of it before the Drudge story broke, not  
 [14] from the press, but from any source other than the press?  
 [15] A My ~~on~~ knowledge ~~is~~ about that is from the press.  
 [16] Q Okay. All right. And, I take it that means no  
 [17] one has even confirmed it, something that you initially read  
 [18] in the press.  
 [19] A I guess you can use an example. You read in the press,  
 [20] as an example, Ms. Mills knew that Vernon Jordan was looking  
 [21] for a job for Monica Lewinsky even before the 18th, and later  
 [22] you ask Cheryl Milk. Is that true? and she says, "Yes."  
 [23] In other words, what you're saying is, your  
 [24] complete knowledge on this topic is from the press.  
 [25] A We got to tell you. I'm not doing fact-finding

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[1] here. So I'm not going around asking people --  
 [2] Q Right.  
 [3] A -- what did they know, when did they know it. But  
 [4] my knowledge is from the press.  
 [5] Q On that point.  
 [6] A Yes.  
 [7] Q Probably on some other points, too.  
 [8] A Yes.  
 [9] Q Okay. Now, Monday morning, what's happening then?  
 [10] A It's Mr. Luther King's Birthday.  
 [11] Q What are you doing?  
 [12] A I had a -- I always have a communications meeting  
 [13] in my office, and even though it was a -- since it was a  
 [14] holiday, I think some people participated by phone. But I  
 [15] was in the office, had a meeting.  
 [16] The President was going to do a service on Martin  
 [17] Luther King's Birthday. We dealt with that event, who was  
 [18] going to staff it. I can't remember who went with him. I  
 [19] think it was Matthews, who's the other deputy of chief of  
 [20] staff, went with him.  
 [21] Q Okay.  
 [22] A I had a separate meeting with the head of the AFL-  
 [23] CIO, so I know I didn't go -- I didn't go with the President.  
 [24] And the few of us who were dealing with what was going on  
 [25] vis-a-vis the press, et cetera, I think understood that this

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[1] Drudge Report was still hanging out there, even though I  
 [2] think no newspapers had picked it up.  
 [3] A And I didn't brief the President that morning, but  
 [4] I think that we decided that the right answer was just to  
 [5] kick the question to Mr. Bennett.  
 [6] Q Okay.  
 [7] A If the President was asked by the press about the  
 [8] Drudge Report to just have him respond to that -- he should  
 [9] refer the question to Mr. Bennett.  
 [10] Q Are you learning anything new factually from  
 [11] anybody on the 19th?  
 [12] A I don't think so. Not on the 19th.  
 [13] Q And, I take it, you hadn't learned anything new  
 [14] factually beyond what you've told us on the 18th also.  
 [15] You've told us everything you know factually at this point,  
 [16] right?  
 [17] A That's correct.  
 [18] Q So there's a discussion at some point "Let's kick  
 [19] it to Bennett if he's asked," when he goes out for this event  
 [20] related to Dr. King.  
 [21] A That's my recollection, yeah.  
 [22] Q All right. What's the next Monica-related  
 [23] interaction you have?  
 [24] A We kind of go through the same scenario the next  
 [25] day. And, again, I don't remember whether I was in the

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[1] briefing with the President, but he was meeting with Prime  
 [2] Minister Netanyahu.  
 [3] A We have what is described as a pool spray. That  
 [4] means all the reporters come in and they click pictures and  
 [5] they shoot some film and they can shout questions. And I  
 [6] think we had the same basic plan.  
 [7] Q And does the President -- you're actually -- maybe  
 [8] I should back up to the 19th. Were you present when the  
 [9] President was being briefed in any sense?  
 [10] A I don't think so.  
 [11] Cl Okay. Were you present on the 20th when he was  
 [12] being briefed?  
 [13] A I mean, I don't have a specific recollection of it.  
 [14] but it would be a normal thing for me to be there.  
 [15] Q Okay. Do you recall at that point any substantive  
 [16] discussion by him, like, "This story isn't true," or anything  
 [17] like that?  
 [18] A No, not -- not on -- I just -- that's why I don't  
 [19] know whether I was in the briefing or not.  
 [20] Q Okay. Anything else on the 20th. Tuesday, the  
 [21] 20th, about the scandal?  
 [22] A I learned -- I think the only new fact I learned  
 [23] was that -- back to our friend, Mr. Drudge -- Mr. Drudge had  
 [24] reported that Ms. Lewinsky had come into the White House  
 [25] after midnight on numerous occasions. I think.

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[1] Q Okay.  
 [2] A I don't remember exactly, again, what the report  
 [3] said.  
 [4] Q Is there a sense that things are getting -- did I  
 [5] cut you off? I'm sorry.  
 [6] A And I said -- I believe I said to Ms. Mills, "We  
 [7] ought to be able to knock that down if that's not true."  
 [8] Q Okay.  
 [9] A And I think she told me it wasn't true.  
 [10] Q Okay.  
 [11] A They had no records of it being true.  
 [12] Q That she had come several times after midnight?  
 [13] A Yeah, several times after midnight.  
 [14] Q And meanwhile is she telling you anything new,  
 [15] anything that she knows about -- is she telling you anything  
 [16] new or old that she knows about Ms. Lewinsky?  
 [17] A No.  
 [18] Q Is anybody doing that?  
 [19] A No.  
 [20] Q In other words, you're tracking the story.  
 [21] A Tracking the story, hoping it's all, you know,  
 [22] B.S., and it's going to go away, and that it's only a Drudge  
 [23] Report.  
 [24] Q Any pending sense of worry about this as more  
 [25] details emerge?

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[1] A Well, no more details had emerged, but --  
 [2] Q Okay. Well, at some point he starts using her  
 [3] name; is that correct?  
 [4] A Who?  
 [5] Q Drudge, if you recall.  
 [6] A I don't -- I don't remember that. I don't know.  
 [7] Q Okay.  
 [8] A You'd have to tell me.  
 [9] Q Okay. Tuesday, the 20th. I think is -- we're up to  
 [10] Tuesday, the 20th.  
 [11] A Mm-hmm.  
 [12] Q The story comes out Wednesday, the 21st. in the  
 [13] hard copy Post.  
 [14] A Right.  
 [15] Q And presumably at some point on the Internet  
 [16] edition.  
 [17] A Right. Oh, I don't know that -- I don't know that  
 [18] that's true.  
 [19] Q Okay. But certainly on Wednesday it comes out.  
 [20] You were talking before about something you heard  
 [21] from a reporter. I can't remember right now what it is,  
 [22] but --  
 [23] A Yeah. The Post called in for a response to their  
 [24] story that they were running on the 21st.  
 [25] Q Okay. When did they call, on the 20th or 21st?

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[1] A On the 20th.  
 [2] Q Okay.  
 [3] A The Post was hunting the story on Tuesday that they  
 [4] would publish on Wednesday.  
 [5] Q Okay. And who did they ask for a response?  
 [6] A They were looking for any official response.  
 [7] Q Okay. And did they get one?  
 [8] A I think Mr. Bennett responded to it.  
 [9] C Okay. Do you remember what he said?  
 [10] A No. I mean, I think he --  
 [11] Q All right. You still haven't had a substantive  
 [12] discussion with the President about this, correct?  
 [13] A That's correct.  
 [14] Q How about with Mr. Bowles?  
 [15] A I think the first time I had a discussion with Mr.  
 [16] Bowles was after the -- I don't think we talked about the  
 [17] Drudge Report.  
 [18] Q Okay.  
 [19] A I don't think we did. I don't remember doing it.  
 [20] I think, though, The Post story was significantly different  
 [21] in one regard, which was The Post put the Time Magazine and  
 [22] the Newsweek magazine story kind of together.  
 [23] They said that this was being investigated by Mr.  
 [24] Starr, that -- I think they -- I think that was the first  
 [25] time I learned about the Vernon Jordan issue as well.

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[1] Q Okay.  
 [2] A But that Mr. Starr had gone to the Attorney General  
 [3] and asked for an expansion of jurisdiction at that point  
 [4] expansion of jurisdiction, so that this was not part of the  
 [5] Starr investigation.  
 [6] Q Okay. It was much more serious when The Post story  
 [7] is published both because of the new facts some of which  
 [8] you've elucidated, and because it's published in The Post on  
 [9] the front page as opposed to the Drudge Report.  
 [10] A Both of those things are important.  
 [11] Q Okay. Did you talk to --  
 [12] A And think talked to Mr. Bowles about that.  
 [13] Q Okay. And that would have been on the 21st.  
 [14] A Yeah. I don't recall actually talking to a Post  
 [15] reporter. I think that the people who dealt with reporters  
 [16] came and told me this.  
 [17] Q And that was on the 20th, correct?  
 [18] A On the 20th.  
 [19] Q Okay. Do you remember when you talked to Mr.  
 [20] Bowles, whether it would have been --  
 [21] A I think this would be late in the afternoon or  
 [22] early in the evening.  
 [23] Q On 7  
 [24] A On the 20th.  
 [25] Q Okay.

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[1] A I think.  
 [2] Q Okay. And tell us what you remember about the  
 [3] conversation.  
 [4] A I told him what The Post was going to write the  
 [5] next day, and that, you know, it seemed, you know, that this  
 [6] was significant, serious, a bad story.  
 [7] Q Okay. And did you all talk about in any way the  
 [8] fact that you had this intersection, so to speak, you and Mr.  
 [9] Bowles, at least one intersection connected to Ms. Lewinsky?  
 [10] A Yes.  
 [11] Q And tell us about that.  
 [12] A He said to me -- again I think -- I don't think we  
 [13] had really talked about this over the weekend. I think he  
 [14] said to me something to the effect of, "I don't think we did  
 [15] anything wrong. Did we do anything wrong?"  
 [16] Q Meaning you and he.  
 [17] A Me and him.  
 [18] Q Okay.  
 [19] A And said, No, but we probably shouldn't talk  
 [20] about it."  
 [21] Q All right. And did you talk about it after that?  
 [22] A No.  
 [23] Q And when you say "it," you mean the story -- the  
 [24] burgeoning story in general or the particular things that you  
 [25] all did?

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[1] A The latter.  
 [2] Q Okay. So you didn't talk about what you all had  
 [3] done. What did you talk about with respect to the story,  
 [4] just in general?  
 [5] A I think that -- you know, it was a stunning story.  
 [6] I think it's fair to say, and that we didn't really know how  
 [7] we were going to deal with it, other than try to get Mr.  
 [8] Bennett to deal with it --  
 [9] Q All right.  
 [10] A -- and hope that there was no substance to it. But  
 [11] at that point we really didn't know.  
 [12] Q All right. It's fair to say that you got a tip  
 [13] that whoever had the call with The Post reporter had the  
 [14] general outlines of what The Post was going to be reporting  
 [15] the next day.  
 [16] A Yeah. I -- you know, I put Mr. Jordan -- I don't  
 [17] know whether I knew Mr. -- I mean, that I might have read the  
 [18] next day.  
 [19] Q The Jordan --  
 [20] A But the Ken Starr piece, that they were  
 [21] investigating this, was, I think, all in The Post story the  
 [22] next day.  
 [23] Q Okay. You're saying you might have known the  
 [24] Jordan part the day before the 20th. the Vernon Jordan aspect  
 [25] of it on the 20th.

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[1] A I just don't remember --  
 [2] Q Okey.  
 [3] A -- if that was something that they had told us  
 [4] about or hadn't told us about.  
 [5] Q Okay.  
 [6] A Because The Post will ask for a reaction, and they  
 [7] might give you threequarters of the story, as opposed to the  
 [8] whole story.  
 [9] Q Sure. Okay. You didn't tell him anything about  
 [10] Mr. Hilley? You didn't say like, "By the way, Hilley's not  
 [11] going to write that letter of recommendation?"  
 [12] A No.  
 [13] Q Okay. What happens next? That's on the 20th. Any  
 [14] other thing you can tell us about this in general on the  
 [15] 20th?  
 [16] A I tried to find Mr. Kendall Mr. Bennett Mr. Ruff,  
 [17] Mr. Lindsey, and Ms. Mills. I think I talked to virtually  
 [18] everybody.  
 [19] Q All right. Let them know.  
 [20] A I said that we had to react to The Post because we  
 [21] couldn't let this story run without anybody reacting to it.  
 [22] Q Okay. Did you all react, if you can recall?  
 [23] A Bennett, I think, reacted, as I recall.  
 [24] Q Okay. Do you recall what he said?  
 [25] A I -- you know, I think he gave some general denial,

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[1] but I don't remember --  
 [2] Q Okay. What about the -- what next?  
 [3] A I think he said, "I smell a rat," a sentiment many  
 [4] of us felt.  
 [5] Q Okay. Anything on the 20th, anything else on the  
 [6] 20th?  
 [7] A That was kind of late in the afternoon or early in  
 [8] the evening so we -- essentially, that shut -- once we -- I  
 [9] had talked to a round of the lawyers, somebody was going to  
 [10] get back The Post, and I think we concluded that Mr. Bennett  
 [11] was the right person to get back to The Post.  
 [12] It was over until the next day when we knew --  
 [13] Q Okay.  
 [14] A I mean, I went home and went to bed.  
 [15] Q Okay.  
 [16] A Got up in the morning and read The Washington Post.  
 [17] Q All right. Again, no one's giving you any new  
 [18] factual information.  
 [19] A No.  
 [20] Q All right. On the 21st The Post story comes, all  
 [21] heck breaks loose, correct?  
 [22] A That's correct.  
 [23] Q What happens -- what's your morning like on the  
 [24] 21st?  
 [25] A Gloomy.

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[1] Q Okay.  
 [2] A We had our regular morning meetings. I think the  
 [3] people really weren't sure how to deal with this, how to  
 [4] react to it.  
 [5] Q Okay.  
 [6] A And we went in to see the President.  
 [7] Q Who's "we"?  
 [8] A Mr. Bowles, myself, and Ms. Matthews.  
 [9] Q Okay. Tell us about that.  
 [10] A That's a regular meeting we always have. Not all  
 [11] three of us are always in there, but generally we try to  
 [12] always get in there together. It kind of starts his day.  
 [13] Q All right.  
 [14] A We brief him on what's going on during the course  
 [15] of the day and, you know, get any feedback from him.  
 [16] And we started off meeting -- we didn't -- I don't  
 [17] think we said anything, and I think the President directed  
 [18] this specifically to Mr. Bowles. He said, "Erskine, I want  
 [19] you to know that this story is not true."  
 [20] Q What else did he say?  
 [21] A He said that - that he had not had a sexual  
 [22] relationship with her, and that he never asked anybody to  
 [23] lie.  
 [24] Q Okay. What else?  
 [25] A I think that's all he said.

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[1] Q Okay. -- was the response of Mr. Bowles,  
 [2] yourself, or Ms. Matthews?  
 [3] A I think we were trying to kind of -- you know, I  
 [4] think was an intense or a tense period, and we were just  
 [5] trying to, you know, kind of, I guess, buck all of our  
 [6] spirits up a little bit, all four of us, not just his in  
 [7] particular.  
 [8] Q All right. Who said what?  
 [9] A I don't remember. I mean, I don't think anybody  
 [10] said anything. I don't know that there was all that much to  
 [11] say.  
 [12] Q Did anybody give him any advice about how he ought  
 [13] to handle it?  
 [14] A I don't think at that point in that meeting we did.  
 [15] I think that there was the -- Chuck was dealing with Kendall,  
 [16] Mr. Kendall, the President's lawyer in this matter, and Mr.  
 [17] Bennett, the Paula Jones lawyer, and they were going to get  
 [18] together later in the morning, and we said we would get back  
 [19] to him.  
 [20] Q Okay.  
 [21] A He had some previously scheduled press interviews.  
 [22] My recollection was those were scheduled for fairly early in  
 [23] the day, and I think we moved those back till later in the  
 [24] day so that we'd have time for Bennett and Kendall and Ruff  
 [25] and company to get together and figure out how to react to

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[1] the story. Obviously, the President was going to be asked  
 [2] about this and to give us time to kind of brief him.  
 [3] Q You were gloomy. I think you said it was a gloomy  
 [4] day.  
 [5] A It was definitely a gloomy day.  
 [6] Q Were you feeling gloomy?  
 [7] A I was feeling -- you know, it was -- I think that  
 [8] it was a shocking story.  
 [9] Q Can you describe the President's demeanor in that  
 [10] meeting you had with him that morning?  
 [11] A Intense.  
 [12] Q Okay. How do you mean?  
 [13] A He was forceful when he spoke to us. spoke to  
 [14] Erskine.  
 [15] Q When he made the denial?  
 [16] A Yes.  
 [17] Q Okay. Did he appear to be affected by the story?  
 [18] A Yeah.  
 [19] Q Bothered by the story?  
 [20] A Oh, I'd say he was bothered by the story.  
 [21] Q I don't know how soon this came out. I should  
 [22] know, and I've just forgotten. I don't know if this was in  
 [23] the original Post story, but fairly early on there were -- I  
 [24] might be jumping ahead a little here. Fairly early on there  
 [25] were reports of several visits to the White House by Ms.

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[1] Lewinsky and of several courier messages sent. I'll focus on  
 [2] the visits.  
 [3] Did the President ever speak to that issue with  
 [4] you, the issue of if he didn't have an improper relationship  
 [5] with Ms. Lewinsky, what was she doing there so often? Did he  
 [6] ever speak to that?  
 [7] A He said to me -- I don't think it was in this  
 [8] conversation, I think it was a couple weeks later. He said  
 [9] to me that after she left, that when she had come by she  
 [10] came by to see Betty, and that he -- when she was there,  
 [11] either Betty was with them -- either that she was with Betty  
 [12] when he saw her or that he saw her in the Oval Office with  
 [13] the door open and Betty was around -- and Betty was out at  
 [14] her desk.  
 [15] Q Okay.  
 [16] A So that they weren't alone in -- you know, in that  
 [17] sense, that the door was open --  
 [18] Q Okay.  
 [19] A -- and somebody was standing outside the door.  
 [20] Q I apologize that I'm jumping a head a little bit,  
 [21] because we were at the 21st, and now you're saying this  
 [22] was --  
 [23] A I think that might have been maybe like the 23rd.  
 [24] Q Okay. Is there another explanation by the  
 [25] President in your presence between this denial to Mr. Bowles

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[1] on the 21st and this conversation perhaps on the 23rd that  
 [2] you're telling us about?  
 [3] A Is -- I'm sorry, but you have to repeat that  
 [4] question.  
 [5] Q Sure. Is there another conversation -- you've  
 [6] mentioned the denial in front of yourself and Ms. Matthews  
 [7] and Mr. Bowles.  
 [8] A Right.  
 [9] Q And now you've mentioned this other conversation a  
 [10] couple of days later about saying that when she -- she would  
 [11] come by to visit Betty after she left the White House, and  
 [12] she would either be visiting Betty or if he talked to her,  
 [13] the door -- it would be in the Oval Office with the door --  
 [14] A With Betty there or the door would be open.  
 [15] Q Okay. And presumably with Betty right outside the  
 [16] door --  
 [17] A Yes.  
 [18] Q -- if she wasn't inside; is that correct?  
 [19] A That's correct.  
 [20] Q Any conversations between those two where he gives  
 [21] any kind of -- repeats his denial to you in your presence or  
 [22] gives an explanation at all in your presence?  
 [23] A Yes.  
 [24] Q All right. Tell us about that.  
 [25] A We had a couple conversations in which he cleared a

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[1] statement for McCurry -- that he just cleared it, that had  
 [2] been prepared by the lawyers.  
 [3] Q Okay.  
 [4] A He said that the lawyers signed off on this, and I  
 [5] double-checked and said yes, and he said "Fine."  
 [6] Q Okay. These were public statements.  
 [7] A Public statements --  
 [8] Q Okay.  
 [9] A -- that said no improper relationship.  
 [10] Q Okay. Other than -- I'm sorry, go ahead.  
 [11] A And then we prepped him for the press interviews,  
 [12] which he did do on that Wednesday.  
 [13] Q Pre-set interviews.  
 [14] A Pre-set interviews.  
 [15] Q Okay.  
 [16] A And then he met with Mr. Arafat the next day, and  
 [17] we had another session, kind of getting ready for the press.  
 [18] Q Okay.  
 [19] A On all those occasions Mr. Ruff was there, kind of  
 [20] led the prep and said, basically, "You shouldn't go beyond --  
 [21] you know, they've made two allegations, that you've had a  
 [22] sexual relationship, and that you've -- you know, told people  
 [23] to not tell the truth, and you should deny those." You know,  
 [24] the President was denying those things, but, "You shouldn't  
 [25] go beyond that."

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[1] Q Did he indicate he wanted to go beyond that?  
 [2] A I think he was getting that advice from his  
 [3] counsel, and he was taking the advice.  
 [4] Q Okay. Other than -- can I ask this question?  
 [5] Okay. It's a 13-part question. Just kidding.  
 [6] Other than the statements that are being worked on  
 [7] that are for public consumption --  
 [8] A Right.  
 [9] Q -- "You will say this" --  
 [10] A Right.  
 [11] Q and, "The lawyers have cleared this" --  
 [12] A Right.  
 [13] Q -- any other statements by the President to you or  
 [14] in your presence where he is speaking substantively about the  
 [15] allegations?  
 [16] I mean, you've mentioned the denial to Enkin  
 [17] Bowles --  
 [18] A Yeah, right.  
 [19] Q -- and you had mentioned what he said to you about  
 [20] Monica coming by after she was transferred out. Apparently on  
 [21] the 23rd.  
 [22] Between those two times, any substantive statement  
 [23] by him?  
 [24] A I had one conversation with him on the morning of  
 [25] Friday.

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[1] Q The 23rd in the morning.  
 [2] A The 23rd right.  
 [3] Q Tell us about that.  
 [4] A See, we were getting ready to do the State of the  
 [5] Union prep, and he was working on the State of the Union  
 [6] draft, back in his study.  
 [7] I went back there just to kind of get him going --  
 [8] this is first thing in the morning -- and he said -- you  
 [9] know, we sort of get engaged. I asked him how he was doing,  
 [10] and he said he was working on this draft, and he said to me  
 [11] that he had never had sex with her, and that -- and that he  
 [12] never asked -- you know, he repeated the denial but he was  
 [13] extremely explicit in saying he never had sex with her.  
 [14] How do you mean?  
 [15] 4 Just what I said.  
 [16] Q Okay. Not explicit in the sense that he got more  
 [17] specific than sex, than the word "sex."  
 [18] A Yes, he was more specific than that.  
 [19] Q Okay. Share that with us.  
 [20] A Well I think he said -- he said that -- there was  
 [21] some spate of, you know, what sex acts were counted, and he  
 [22] said that he had never had sex with her in any way  
 [23] whatsoever --  
 [24] Q Okay.  
 [25] A -- that they had not had oral sex.

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[1] Q Okay. You had started to talk about the --  
 [2] MR. WISENBERG: They want me to show up now? Can't  
 [3] ask a couple more? Hearing no outbreaks, I'll continue for a  
 [4] while.  
 [5] BY MR. WISENBERG:  
 [6] Q You had mentioned this other conversation that you  
 [7] think was on the 23rd also where he mentioned the  
 [8] circumstances of Ms. Lewinsky coming by --  
 [9] A Right.  
 [10] Q -- after she was transferred. Okay. That's a  
 [11] different conversation?  
 [12] A I think that's later in the day.  
 [13] Q Okay. Let's go back to the first one. No question  
 [14] in your mind he's denying any kind of sex in any way, shape,  
 [15] or form, correct?  
 [16] A That's correct.  
 [17] Q All right. What else did he say at that particular  
 [18] session?  
 [19] A He said to me, "I don't know how I could put that,  
 [20] but that's the truth."  
 [21] Q Okay. Now, what about this meeting that you think  
 [22] is later in that day? Have you given us everything he said  
 [23] about that at that point in time, the Betty Currie stuff?  
 [24] A Yeah.  
 [25] C Okay. And was that speaking specifically to this

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[1] issue of how many times -- I mean, what context did it come  
 [2] into?  
 [3] A I think it was -- the context was that was where  
 [4] the press was on lots of private meetings --  
 [5] Q Okay.  
 [6] A -- midnight meetings, et cetera.  
 [7] Q All right.  
 [8] A And he raised that with me, I think, just -- I  
 [9] think I was the only -- I think it was just with me.  
 [10] Q Okay. Tell us everything you remember about it.  
 [11] A I was in the Oval Office, and my recollection is  
 [12] that I may have briefed him on what the press was hot on then  
 [13] at that moment, which changed by the hour, but -- and I think  
 [14] he volunteered that to me.  
 [15] Q Okay. What else did he say on that topic?  
 [16] A That was it.  
 [17] Q All right. Did he tell you that he was -- at  
 [18] either of -- go ahead.  
 [19] A I'm not -- I encouraged him to talk to Mr. Ruff and  
 [20] Mr. Kendall about these matters. I should be clear.  
 [21] Q Okay.  
 [22] A So those interchanges are generally between the  
 [23] lawyers, and I encouraged that.  
 [24] Q Right. Were you alone with him on that morning,  
 [25] the 23rd, when you were in the study with him?

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[1] A Yes, it was he and I, just he and I.  
 [2] Q Did he mention anything to you the 21st, 22nd, or  
 [3] the 23rd about his being involved in kind of ministering to  
 [4] Ms. Lewinsky? She was a troubled person, and he was  
 [5] ministering to her or counseling her?  
 [6] A No.  
 [7] Q Did he ever say anything like that to you?  
 [8] A No.  
 [9] Q How good is his memory?  
 [10] A I would say it's pretty good.  
 [11] Q Okay. You've been very patient with us. We stood  
 [12] you up last time when you came. But it looks like you will  
 [13] have to make a return appearance.  
 [14] A Okay.  
 [15] Q And I apologize for that. We know that you have an  
 [16] important job, and you're doing the nation's business. I  
 [17] understand you're going to China.  
 [18] A That's correct.  
 [19] Q That's next week, right?  
 [20] A Yeah.  
 [21] Q Okay. When do you actually leave?  
 [22] A I think Wednesday, around noon.  
 [23] Q Of next week?  
 [24] A Right.  
 [25] Q Okay. I'll be in contact with your attorney about

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[1] scheduling.  
 [2] A Okay.  
 [3] MS. WISENBERG: Do we want to ask the witness to  
 [4] step outside for a couple of minutes before we excuse him for  
 [5] the day?  
 [6] THE WITNESS: I think they're ready to go.  
 [7] MR. WISENBERG: Why don't we -- I'll tell you what.  
 [8] I probably won't ask you to come back in but I'll ask you  
 [9] not to leave the area where your attorney is.  
 [10] THE WITNESS: Okay.  
 [11] MR. WISENBERG: All right. May the witness be  
 [12] excused?  
 [13] THE FOREPERSON: Yes, he may.  
 [14] (The witness was excused.)  
 [15] (Whereupon, at 4:38 p.m., the taking of the  
 [16] testimony in the presence of a full quorum of the Grand Jury  
 [17] was concluded.)  
 [18] . . .  
 [19] . . .  
 [20] . . .  
 [21] . . .  
 [22] . . .  
 [23] . . .  
 [24] . . .  
 [25] . . .



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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In re:

GRAND JURY PROCEEDINGS

----- x

Grand Jury Room No. 3  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001  
Tuesday, June 23, 1999

The testimony of JOHN DAVID PODESTA was taken in  
the presence of a full quorum of Grand Jury 97-2, impaneled  
on September 19, 1991, commencing at 10:45 a.m., before:

SOLOMON WISENBERG

Deputy Independent Counsel

Office of Independent Counsel

1001 Pennsylvania Avenue, Northwest

Suite 490 North

Washington, D.C. 20004

PROCEEDINGS

Whereupon,

JOHN DAVID PODESTA

was called as a witness and, after having been duly sworn by  
the Deputy Foreperson of the Grand Jury, was examined and  
testified as follows:

EXAMINATION

BY MR. WISENBERG:

Q Would you state your name for the record, please

A John David Podesta.

Q Are you the same John David Podesta who testified  
in front of us last week?

A Yes.

Q And this is your third --

A Was that a trick question?

Q No. Not at all. You're not a John Podesta  
impersonator or anything like that.

A I saw "The X-Files" over the weekend I don't  
know.

Q And this is your third appearance in front of the  
grand jury. Is that correct?

A Yes. The third before this grand jury.

Q Each time you have come, we've gone over some of  
your rights and responsibilities as a grand jury witness.  
Do you need to have those reviewed for you?

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WITNESS:

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John David Podesta

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GRAND JURY EXHIBITS:

No. JDP-2 Map of West Wing of White House  
with notations

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A No.

Q All right. And you are here again with your  
attorney Mr. Kadzik?

A Kadzik.

Q Is that D pronounced?

A K-a-d-z-i-k. Yes. Kadzik.

Q Kadzik. Okay. Before we go -- we were on our  
chronological trail which will end at some point, we're not  
going to do every day from January up until the present, but  
I want to go back for a little bit and ask you, did you ever  
give a copy of the Drudge Report to -- any of these Drudge  
Reports that were coming out between the 18th, I think the  
early morning of the 18th and the Post article, did you  
yourself give any of those reports to anybody?

A Not that I recall.

Q Did you tell anybody, other than the people you've  
testified about, tell anybody about the Drudge Report?

A No, I think that there were at least a few people  
in the White House knew about it and, as I said, I think we  
anticipated in our normal fashion that we get together every  
morning in my office just to think about what questions might  
get shouted at the President, and so that came up prior to  
the Post story because it was on the Drudge Report.

Q Did you -- you mentioned a meeting, a normal, daily  
meetings involving yourself, Mr. Bowles and Ms. Matthews.

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<p>1 A Correct.</p> <p>2 Q And you mentioned that it was on the 21st, the day</p> <p>3 of the Washington Post article, and this was the President's</p> <p>4 first denial that you heard personally of the story. Is that</p> <p>5 correct?</p> <p>6 A That's correct.</p> <p>7 Q Do you recall whether or not in that conversation</p> <p>8 or in any other conversation Mr. Bowles urged the President</p> <p>9 to get the story out as quickly as possible?</p> <p>10 A I don't specifically recall that he did that,</p> <p>11 especially in that conversation which I think was -- my</p> <p>12 recollection of the conversation was it was kind of a one-way</p> <p>13 conversation in that the President was aware of the Post</p> <p>14 story and, again, I have a kind of -- it was powerful in that</p> <p>15 he said to Mr. Bowles, and I kind of distinctly remember that</p> <p>16 he addressed it to Erskine, that he didn't do the things that</p> <p>17 were alleged in the newspaper.</p> <p>18 I think that -- my recollection is the way we</p> <p>19 finished up on that was just that the lawyers were going to</p> <p>20 meet, they would be back to him and that we needed to do the</p> <p>21 press interviews, but I don't have a specific recollection of</p> <p>22 him saying that in that conversation.</p> <p>23 Q How about in any other conversations? Or saying</p> <p>24 something to that effect?</p> <p>25 A I don't remember him saying that to the President</p>	<p>1 talk to people.</p> <p>2 Q As an example, we need to get a hold of so and so</p> <p>3 on this. Betty Currie, Vernon Jordan, just as example</p> <p>4 A No. No. Witnesses? No, I don't recall him doing</p> <p>5 that at all. Not with us.</p> <p>6 Q What about anybody else?</p> <p>7 A I didn't participate in the meetings with the</p> <p>8 lawyers, so I don't know whether --</p> <p>9 Q You never participated in any of the lawyer</p> <p>0 meetings?</p> <p>1 A Well, I think there were lawyers -- there were</p> <p>2 sometimes lawyers in meetings that were briefing the</p> <p>3 President about how to react, including starting virtually</p> <p>4 that day, on how to react to the press.</p> <p>5 So the lawyers came to those meetings, which I</p> <p>6 would call, I guess, press meetings or communications</p> <p>7 meetings. But the President was meeting separately with his</p> <p>8 lawyers and I did not participate in those meetings.</p> <p>9 Q Okay. Did anybody --</p> <p>0 A Did I draw that distinction sensibly?</p> <p>1 Q I understood.</p> <p>2 A Okay.</p> <p>3 Q And I'm kind of a touchstone, kind of the lowest</p> <p>4 common denominator. If I can understand it, anybody can</p> <p>5 handle it.</p>
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<p>1 Q Do you remember him saying it to anybody else?</p> <p>2 A No. I think Mr. Bowles fairly quickly put -- kind</p> <p>3 of divided the responsibility for working on this matter and</p> <p>4 focused the work of the counsel's office as handling it. And</p> <p>5 so if he had a view about how to handle it, I don't remember</p> <p>6 it other than to essentially hand it off to Mr. Ruff, the</p> <p>7 White House counsel, to deal with it and the few people who</p> <p>8 dealt with the kind of public affairs, the press reaction</p> <p>9 side of it, who would deal with Mr. Ruff and then he mostly</p> <p>10 got out of it.</p> <p>11 So, again, if he had a strong view about it, I just</p> <p>12 don't recall it, but within a day or two he wasn't really</p> <p>13 participating in any discussions about how to deal with the</p> <p>14 press on it and certainly not in any, I don't think -- I'm</p> <p>15 not aware that he was dealing with any discussions with the</p> <p>16 lawyers about what they were doing, about how to handle the</p> <p>17 matter.</p> <p>18 Q Did the President directly or indirectly in the</p> <p>19 first few days after the scandal broke, did he ask you</p> <p>20 directly or indirectly to reach out to anybody or to ask</p> <p>21 others to reach out to anybody, to a particular person, for</p> <p>22 any reason?</p> <p>23 A I think we were mostly talking to him, so if you're</p> <p>24 searching for something you've got to prompt me a little</p> <p>25 bit. I don't remember him giving any specific direction to</p>	<p>1 A Okay.</p> <p>2 Q What about somebody else? Anybody else ask you</p> <p>3 to -- in the first few days or weeks of the scandal -- reach</p> <p>4 out and get a hold of somebody who could be characterized as</p> <p>5 a potential witness?</p> <p>6 A No. Not that I recall. I mean, I think we --</p> <p>7 again, I don't recall being directed to do this, but we --</p> <p>8 you know, obviously, we're talking to the press. There</p> <p>9 were people were concerned and calling us.</p> <p>0 I had a meeting with Mr. Bowles on the Hill with</p> <p>1 the Senate Democratic Caucus but I don't remember -- you</p> <p>2 know, I'm just basically saying that the President had denied</p> <p>3 these charges and that we were going to move on and try to</p> <p>4 accomplish the goals that he set forth in the State of the</p> <p>5 Union, but beyond that, I don't remember anybody directing me</p> <p>6 to talk to a witness in any regard.</p> <p>7 Q Okay. And you didn't do that on your own, did you?</p> <p>8 A No.</p> <p>9 Q And when I say direct, no one asked you as opposed</p> <p>0 to directing which implies ordering.</p> <p>1 A No. No.</p> <p>2 Q No one requested either. Is that correct?</p> <p>3 A Total to a witness? No. I don't recall that at</p> <p>4 all.</p> <p>5 Q Or somebody who could potentially be a witness.</p>

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1 A I mean, given this investigation, I think anybody  
2 in the White House is potentially a witness, but I'm not  
3 focusing on anything. I can't remember anything that would  
4 kind of draw a bead on your question.  
5 Q Okay. And you did talk to members of the press  
6 from the get-go, I take it, both on and off the record?  
7 A I talked but not routinely to members of the press,  
8 but I talked a little bit to members of the press.  
9 Q Would that be primarily off the record or  
10 exclusively off the record?  
11 A No, I talked on the record and I may have talked  
12 off the record. The press lives in three worlds. There's  
13 something called background which usually means a White House  
14 official.  
15 Q Okay. What are the other two worlds?  
16 A Off the record, which means that they can't quote  
17 you; on background which means they quote you but not by  
18 name; and on the record, which means you're quoted by name.  
19 Q Okay; And that happens all the time, nothing  
20 inherently -- correct? That you talk to the press?  
21 A Right.  
22 Q That others at the White House talk to the press.  
23 A Right. But it was certainly not my primary  
24 responsibility. There are other people talking to the press,  
25 principally Mr. Kennedy, from the White House. Mr. McCurry

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1 was doing his on-the-record briefings on this topic daily in  
2 the White House briefing room.  
3 Q Kennedy is in the counsel's office?  
4 A Yes.  
5 Q Okay. But was he kind of the person designated to  
6 be the main interface with the press?  
7 A Yes. Other than McCurry's regular on-the-record  
8 briefings.  
9 Q Plus there's a guy named Lockhart, too, correct?  
10 A Joe Lockhart is the deputy press secretary who  
11 works for Mr. McCurry in the press secretary's office and he  
12 would on occasion talk to the press as well. He often  
13 travels. Also, he often travels with the President.  
14 Q Lockhart does?  
15 A Lockhart does. So if they're traveling, fairly  
16 often on domestic trips -- or I'd say most often, Mr. McCurry  
17 doesn't travel, one of the deputy press secretaries travels,  
18 that's usually Mr. Lockhart, so he'd be interfacing with the  
19 President in that regard.  
20 Q And Mr. Kennedy has been there from the get-go of  
21 this particular scandal?  
22 A I can't remember precisely when he started, but it  
23 was right about the time that this broke into the public. We  
24 had a person who has become kind of well known in Washington  
25 named Lanny Davis who I think overlapped for a week or two.

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1 Lanny had worked, again, in the counsel's office as the press  
2 spokesman for the counsel the previous year on the  
3 congressional hearings on the campaign finance issue.  
4 Q So Kennedy has the Lanny Davis slot?  
5 A Yes. Yes.  
6 Q Do you know through hearsay or otherwise if anyone  
7 else was asked to reach out in the first few weeks? In other  
8 words, to get a potential witness, we need to talk to talk to  
9 this person. Do you have any knowledge of that?  
10 A No.  
11 Q Is it safe to say there's a flurry of activity  
12 going on once the scandal hits the White House? And when  
13 say scandal hits, let's talk about the 21st, because from  
14 what I gather -- you correct me if I'm wrong, from what I  
15 gather from your testimony last time --  
16 Pardon me. There's a knock at the door.  
17 (Interruption to the proceedings.)  
18 MR. WISENBERG: Let the record reflect that I went  
19 to the door and I opened the door and I received a package  
20 and I closed the door.  
21 THE WITNESS: It's not donuts.  
22 (Laughter.)  
23 BY MR. WISENBERG:  
24 Q I take it that there was growing concern between  
25 the -- I guess starting the Friday before the deposition,

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1 continuing through the Drudge Reports on through the 20th,  
2 there was growing concern within the White House. Is that  
3 correct? About this story?  
4 A Well, I would break that into different elements.  
5 There was, as I said in my testimony, on Friday, we were  
6 hearing from Time Magazine which at that time sounded like a  
7 different story about Mr. Starr and his investigation. Then  
8 Saturday was the deposition. Mr. Isikoff raised a  
9 conversation with me.  
10 By Saturday night or early Sunday morning, the  
11 Drudge Report was out. I think at that point, there was  
12 concern, but I think it was at a relatively low level that  
13 Mr. Bennett needed to handle this.  
14 And then by late Tuesday, when the Post called and  
15 said that they had details, introduced Mr. Jordan, as I  
16 recall, into the story. I don't think I knew about that  
17 before. And said that Mr. Starr was investigating it. Then  
18 I think we were at a high level of concern.  
19 Q Okay. And when you said earlier --  
20 A And then, obviously, when the paper came out, we  
21 were -- you know, I would say that there was a good deal of  
22 concern.  
23 Q All right. And it becomes a big issue within the  
24 White House starting on the 21st.  
25 A Yes. Maybe the night of the 20th.

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1 Q Okay. I used the term flurry of activity. That's  
2 not exactly a term of art, but it's fair to say that there  
3 are a number of people who start getting devoted to this  
4 issue in its various aspects. Is that correct?

5 A Yes.

6 Q I want to go back for a minute to the deposition,  
7 the day of the deposition, the Saturday of the deposition,  
8 January 15th. You said that you were at the White House  
9 preparing forth state of the union address. Is that  
10 correct?

11 A That's correct

12 Q Who else do you recall being at the White House  
13 that day that you saw?

14 A Well, I mentioned my conversation with Ms. Mills  
15 and Mr. Sosnik. We had a whole team in. I would say most of  
16 the senior staff of who did any substantive work on the state  
17 of the union, so it would have been some number of speech  
18 writers led by Mr. Waldman, who is our chief speech writer.  
19 Probably Jordan Tamagni, who is one of the deputy speech  
20 writers, I think was there, who had a principal role in the  
21 state of the union.

22 I think Mr. Blumenthal was there. Ann Lewis, who's  
23 communications director. I think Gene Sperling, who is the  
24 head of the National Economic Council; Bruce Reed, who is the  
25 head of the Domestic Policy Council; Elena Kagan, who is the

1 unusual, but you would not normally expect to see on a  
2 day-to-day basis at the White House that you saw on the 19th

3 A I don't believe so. I mean, I said that I had a  
4 meeting with John Sweeney, the head of the AFL-CIO, and his  
5 number two guy over there, his executive assistant The  
6 number two guy is Trumpko, but a guy named Jerry Shay. You  
7 know, it was unusual that they were in, but we were kind of a  
8 skeletal crew that day.

9 The President went out to, I think, Cardozo High  
10 School and painted the school, doing service on that day  
11 And I think he went with Thurgood Marshall, who is the  
12 cabinet secretary, and maybe Sylvia Matthews, who is the  
13 other Deputy Chief of Staff, but I don't remember anybody  
14 unusual around the White House that day.

15 Q Do you recall --

16 A I don't remember seeing, for example, Mr. Bennet  
17 or anyone like that.

18 Q All right How about Mr. Jordan?

19 A I don't think Mr. Jordan was there then, on Monday.

20 Q Okay. When do you recall seeing him?

21 A I think I saw him there on Tuesday.

22 Q All right. Tell us what you recall about that?

23 A I remember just literally bumping into him in the  
24 hallway. I don't know, it could have been Monday, but my  
25 recollection was that it was Tuesday.

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1 deputy director of the Domestic Policy Council.

2 Someone, I'm sure, was there from the environmental  
3 CEO, probably Katie McGinty, but I can't place that for  
4 certain. The Vice President's staff was there, I think, as  
5 I recall. Mr. Begala, who is a communications person,  
6 counsellor to the President. Mr. Emanuel was there who is  
7 the same -- I guess the same job description.

8 So we had almost -- I don't think Mr. Bowles was  
9 there, but I think we had almost our whole senior staff there  
10 working on the state of the union.

11 Q Anybody unusual there who you wouldn't normally  
12 expect to be there?

13 A On that day?

14 Q Right.

15 A Not that I recall.

16 Q Did you interface at all on that day with  
17 Mr. Blumenthal about the calls you've testified about  
18 previously that were starting to come in?

19 A I don't think so.

20 Q How about on -- I think you said you were not there  
21 at all on Sunday, correct?

22 A Right.

23 Q How about on Dr. King's birthday? Did you -- any  
24 people there -- that's the 19th, any people there that were  
25 unusual? You would not normally -- and I'm not saying super

1 Q What do you remember about that?

2 A I just said hello to him. I just said, you know,  
3 like "How's it going?" And he said, "Fine. Things are  
4 fine." That was it

5 Q Okay.

6 A He was in the hallway between my office and  
7 Mr. Emanuel's office. I think he was coming out of  
8 Mr. Emanuel's office.

9 Q How well do you know Vernon Jordan?

10 A I know him professionally, I'd say, pretty well.  
11 I mean, we're friendly. We're not -- I've never been to his  
12 house to dinner or he's never been to my house for dinner. I  
13 don't think I've ever had lunch with him. But I'd say we're  
14 friendly acquaintances in a work environment.

15 Q Has he ever come specifically to visit you about  
16 anything at the White House?

17 A The only thing I recall that he -- and I would say  
18 that he popped in on me would have been months before that  
19 He's a fairly close friend of Mr. Bowles and there was a time  
20 in the -- I'd say spring of 97 when Mr. Bowles was sort of  
21 regretting having come back to the White House, a sentiment  
22 I'm sure shared by many of the people at the White House

23 But at that point, Mr. Bowles had -- the President  
24 had kind of talked Mr. Bowles into coming back to the White  
25 House in November of 96, he came back as Chief of Staff

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1 By the spring of 97, he -- you know, he had kind  
 2 of left his family in North Carolina, I think he was  
 3 somewhat, you know, as I say, regretful of having come back.  
 4 And Vernon was a good friend. I think they're pretty good  
 5 friends. And I remember him popping in on me and asking me  
 6 how is he doing, was he okay, he seemed sort of down about  
 7 the work and the job and being there.  
 8 He was a witness in the Whitewater matter, not this  
 9 matter, but the Whitewater matter. I think that was sort of  
 0 bothering him.  
 1 Q Bowles? Bowles was?  
 2 A Yes. And I think that's the only occasion I  
 3 remember where Vernon actually came to see me. I recall he  
 4 kind of popped in on me in that regard. And then he would  
 5 call me once in a while and say how is Erskine doing and I'd  
 6 say he's fine or whatever.  
 7 Q Did you ever have a conversation with him or --  
 8 well, let me start it this way. Did you ever have a  
 9 conversation with Mr. Jordan that was in any way, shape or  
 0 form about either the Paula Jones matter or the Monica  
 1 Lewinsky matter?  
 2 A No.  
 3 Q Were you ever a participant in any way or an  
 4 observer of a conversation he had with anybody else about  
 5 those two matters?

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1 A No. I don't think so.  
 2 Q I take it, then, that since the President's  
 3 deposition you've had no conversations with Mr. Jordan.  
 4 A I talked to him once by phone, same subject as my  
 5 previously phone conversation that I've described. He  
 6 actually, I think, had called for Erskine in the office and  
 7 Erskine wasn't there, Mr. Bowles, and I think I was just kind  
 8 of walking by and I picked up the phone and he just was  
 9 calling to see how he was doing.  
 0 Q Who -- again, I am excluding what you've read or  
 1 seen in the press or heard, do you know of anyone else who  
 2 has been talking to Mr. Jordan on behalf of the White House  
 3 or who works at the White House since the President's  
 4 deposition about the Monica Lewinsky issue? And I don't mean  
 5 necessarily you personally know, but do you know or have you  
 6 heard, again, excluding the press.  
 7 A The only occasion that I recall knowing that is on  
 8 Thursday, the story came out on Wednesday, the 21st, on  
 9 Thursday in one of our press prep sessions, Mr. McCurry asked  
 0 the President have you talked to Vernon and the President  
 1 said, yes, he had.  
 2 Q Any conversations beyond that? I mean in that  
 3 particular exchange. Anything about Mr. Jordan or the  
 4 conversations.  
 5 A No. I think that at that point, again, I think

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1 from the people dealing on the press side of this, we weren't  
 2 trying to get a lot of information. We wanted to give that  
 3 the lawyers. And I think Mr. McCurry said, "Well, you ought  
 4 to tell Chuck about that and find out what you want to say  
 5 about it."  
 6 Q All right. There was no more elaboration on the  
 7 conversation between the President and Mr. Jordan.  
 8 A Not that I recall. I think it was very brief, but  
 9 I remember it.  
 0 Q Okay. Now, is that it? With respect to my  
 1 question about anyone in the White House or on behalf of the  
 2 White House talking to Mr. Jordan since the President's  
 3 deposition that you --  
 4 A About this matter?  
 5 Q About the Monica Lewinsky matter.  
 6 A I don't know of any other people who I've talked to  
 7 about that.  
 8 Q How many conversations have you had with Betty,  
 9 Currie since the story broke on the 21st in any way, shape or  
 0 form about Monica Lewinsky or the Monica Lewinsky matter?  
 1 A I think the answer to that is none, although I have  
 2 asked her how she's doing. Especially after her first  
 3 appearance, I was concerned about her.  
 4 Q Just because of the --  
 5 A It was like an "Are you okay" conversation.

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1 Q And what did she say to you?  
 2 A I think especially after her first testimony I  
 3 think she was pretty shaken up.  
 4 Q Do you recall what she said?  
 5 A I tried to comfort her a little bit. I said, you  
 6 know-just things will be okay.  
 7 Q Did she say anything to you?  
 8 A No.  
 9 Q You said she was shaken up.  
 10 A Well, I think she looked and seemed shaken up.  
 11 Q How about Nancy Henrich? How many conversations  
 12 have you had with Nancy Henrich the story broke. on the 21st  
 13 in any way, shape or form about Monica Lewinsky or the Monica  
 14 Lewinsky matter?  
 15 A Again, I would say none other than one of the day  
 16 I came here she was out there. I said, "Are you done?" she  
 17 said, "Yes, I think so." And -- I mean, so it's kind of  
 18 passing, "Are you going to the grand jury today?" But I've  
 19 not had any substantive conversations with her about it.  
 20 Q Okay. Same question with respect to -- I'm going  
 21 to ask this question with respect to a few more people.  
 22 A Okay.  
 23 Q Evelyn Lieberman.  
 24 A I don't believe I've talked to her at all about  
 25 anything.

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1 Q Okay. Ever in your whole life or just since the  
2 21st?

3 A No, since the 21st. I may have, but I don't recall  
4 specifically. Well, obviously we worked together previously.

5 Q Okay. How about -- refresh my recollection,  
6 please, on how you worked together previously.

7 A She was the deputy press secretary when I was the  
8 staff secretary. And she before that was the chief of staff  
9 to the -- she was like the chief of staff to the chief of  
10 Staff of the First Lady when we first were there.

11 Q Okay. All right. Now, she was deputy--

12 A And I worked with her when she worked on the Senate  
13 Judiciary Committee. I've known her for a long time.

14 Q And the deputy -- when she was deputy chief of  
15 staff to --

16 A Oh, deputy chief of Staff --

17 Q When she was --

18 A Right.

19 Q -- to Mr. Panetta --

20 A Right.

21 Q Were you working in the White House then?

22 A No. That was after I left.

23 Q So as far as you know, you've had no conversation  
24 with her relating to the Monica Lewinsky matter.

25 A Correct. I'm certain of that. And, again, I don't

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1 recall even talking to her since then.

2 Q How about Erskine Bowles? You mentioned some of  
3 the conversations you had last time with him, I think the  
4 initial conversation. And I think you indicated, you correct  
5 me if I'm wrong, that you said we probably shouldn't be  
6 talking about the substance of kind of the history of what  
7 you and he had done.

8 A That's correct.

9 Q And did you maintain that, you didn't talk about  
10 that with him?

11 A I have not talked about that with him.

12 Q All right. I take it you've talked about  
13 certain -- you've talked about the Lewinsky matter with him  
14 in certain other respects just having to do with how it needs  
15 to be handled as an issue?

16 A Very little.

17 Q Okay.

18 A He has -- I think that he has laid down the law, if  
19 you will, to the substantive staff that they should tend to  
20 what they're working in the White House for, which is to try  
21 to get some progress on the domestic policy or national  
22 security front, and I think to some extent by example and to  
23 some extent just by preference, he has led that effort and  
24 virtually spends zero time on this.

25 Q Okay. Do you recall any discussions with him other

1 than what you've told us about about the Lewinsky matter?

2 A I think maybe, you know, just like literally  
3 passing references to, you know -- you know, there's an up  
4 story in the newspaper or -- but not the substance of it.

5 He really kind of basically doesn't get into it at  
6 all and so he -- you know, it may be -- you know, kind of  
7 where is this going or when is it going to end but literally  
8 conversations that last for seconds, not minutes.

9 He has just not gotten into any part of -- I don't  
10 know whether he's independently talked to Mr. Ruff, but not  
11 to my knowledge.

12 Q Have you ever talked with him about what you all  
13 would do, what you would do or he would do if the President's  
14 denials to you turned out not to be true?

15 A No.

16 Q Would it be fair to say that the President's denial  
17 to you, to Mr. Bowles on that first day, I think what you've  
18 characterized as a strong denial, plus you've mentioned two  
19 later statements the President made to you --

20 A Correct.

21 Q Would it be fair to say those had a strong effect  
22 on you?

23 A Yes.

24 Q And why is that?

25 A I didn't think he was equivocating at all. He was

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1 very forceful. I believed what he was saying

2 Q I want to talk about the twice daily meetings that  
3 discuss, among other things or perhaps exclusively, the  
4 Lewinsky matter. Are you ever a participant in those  
5 meetings?

6 A Yes.

7 Q They are at roughly when and when during the day?

8 A Well, you sort of implied something which isn't  
9 true.

10 Q Okay.

11 A Which is that they involve exclusively the Lewinsky  
12 matter.

13 Q Okay.

14 A We had -- previously, the whole previous year,  
15 we had met on the campaign finance issue and that meeting  
16 occurred essentially after -- we have the senior staff  
17 meeting and then we have a communications meeting, a big  
18 communications meeting, to try to plan out the day,  
19 and then we would meet on what might be put in the  
20 scandal/congressional investigation pot A somewhat  
21 different group of people.

22 After this story broke, we started having that  
23 meeting in Mr. Ruff's office, but that covers anything that  
24 we were being attacked for. I'd say in the spring, a good  
25 chunk of that was this investigation, but we still have Mr.

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1 Burton attacking us on campaign finance and we have other  
2 congressional investigations attacking us on various sundry  
3 things that they're poking at us on.

4 And now, in fact, we spend -- and to the extent  
5 that I participate in the meeting in recent days, we've spent  
6 a good deal of it on how we're responding to the China issue  
7 with regard to missile technology, satellites being launched  
8 on Chinese missiles.

9 Q And the meetings are what time of day?

0 A We meet at about 8:45 in the morning. That's kind  
1 of been drawn back to about 8:30 so that we can have time to  
2 discuss this China stuff. And then 6:30 at night.

3 Q And what would you call these? So they're not  
4 exclusively devoted to the Lewinsky matter.

5 A Yes. Although there's sort of a revolving cast of  
6 characters which is that there are some people who come and  
7 &al -- the people who deal with this investigation, campaign  
8 finance, that's kind of one group of people.

9 The people who deal with the China part, there's  
0 sort of an overlap, but some people leave and some new  
1 people -- the National Security Council people come who don't  
2 come to the --

3 Q Do you have a name for these meetings?

4 A No.

5 Q Okay. You are typically an attendee at these

1 definition than three groups getting together, is it  
2 basically -- primarily, how do we respond to the press?

3 A Yes. There is a -- you probably know this, but  
4 there is a separate meeting of lawyers that precedes this  
5 meeting, I think both in the morning and the afternoon,  
6 although I must tell you I'm not sure of that. I'm sure that  
7 it happens in the morning, I think it happens in the  
8 afternoon. In which just the lawyers meet\_

9 Q And when you say the lawyers --

0 A The White House Counsel's Office and I believe  
1 they're -- at least at one point, they were talking to the  
2 outside attorneys as well in that conversation. Mr. Kendall  
3 with respect to your investigation. Mr. Bennett I think  
4 might participate, I'm not sure.

5 Q Okay.

6 A So that's a separate meeting which excludes the  
7 communications people and excludes me. And I think the focus  
8 on that meeting is more this investigation or the Starr  
9 at-large investigation. I don't think they get into what  
0 Congressman Hoekstra is doing about the Teamsters or  
1 whatever.

2 Q But this is primarily --

3 A This is a press meeting.

4 Q What I'm going to call the twice daily meetings.

5 A Right.

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1 meetings?

2 A I would say the answer to that is no. I probably  
3 go three days a week in the morning. We do them every  
4 morning, every afternoon, and I probably -- so I'm there  
5 60 percent of the time in the morning and I probably am there  
6 maybe once a week in the afternoon. I've got more  
7 responsibility on China, so I'm a little bit there more often  
8 in the last couple of weeks.

9 Q You've told us the general things that are the  
0 subject matters of this meeting.

1 A Right.

2 Q Which I take it have to do with areas that the  
3 administration feels it's being attacked on and what is  
4 the--

5 A It's kind of that cross between what the lawyers  
6 are doing and what the press and the communications and to  
7 some extent the Capitol Hill people are doing.

8 Q All right. Is it an effort to brief various people  
9 about what the -- people who have different roles? You  
0 mentioned the legislative, legal and press people. For them  
1 to kind of get together and brief each other, be on the same  
2 page? Is that a fair statement?

3 A Yes. That's a fair statement.

4 Q Are they primarily -- you've told us the subject  
5 matter. so -- and maybe you can't give a more specific

1 Q IS a press meeting.

2 A Press/communications meeting.

3 Q At that meeting, at these twice daily meetings or  
4 at any other meetings that you're aware of do the  
5 non-lawyers -- well, let me strike that because you're a  
6 lawyer.

7 Does anybody get briefed on what witnesses have  
8 said either to the grand jury or to our investigators? I'm  
9 not implying that there's anything wrong with that.

0 A I'm going to have one exception to this rule, but I  
1 would say that virtually never.

2 Q Okay.

3 A There's very little information exchanged about  
4 what's going on in terms of the conduct of the investigation.

5 It's a meeting that's focused on what stories are working,  
6 what reporters are asking, what's going to be on the evening  
7 news, what just was on the evening news, do we have to  
8 respond to it

9 Q What's the one exception?

0 A Relatively early, you can probably place the date  
1 for me, there was one occasion which crossed over on that  
2 front which is that The Wall Street Journal had post& a  
3 story on its web site on what Master Chief Nelvis had said  
4 in the grand jury, is my recollection, which we were told  
5 was false and that his lawyer was correcting it and I

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1 believe -- then the story didn't run and it's become a kind  
2 of famous or infamous case of the press, so that the Wall  
3 Street Journal ran it on their web site but never printed  
4 it in the newspaper or they printed a different story in  
5 the newspaper.

6 So that's -- I mean, I've kind of thought about  
7 this a little bit and that's the only occasion I can think  
8 of where people said that was not what somebody testified  
9 to.

10 Q Okay. And what was --

11 A In our meeting.

12 Q And what was false, what you understood that was  
13 false, was that Nelvis testified to X in front of the grand  
14 jury.

15 A Right I mean, it was a very -- it was kind of a  
16 salacious story on the web site and the web site cited  
17 Nelvis' testimony as the basis for the story and I believe  
18 that the lawyer issued some statement that said it was not  
19 correct.

20 Q Nelvis' lawyer. That you were told --

21 A That's correct.

22 Q That you were told at this meeting, you and the  
23 other participants were told by somebody from counsel's  
24 office?

25 A Yes.

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1 Q That the story was false and that his lawyer would  
2 be correcting it.

3 A Had corrected it or issued a statement or was  
4 issuing a statement, I don't remember the sequence.

5 Q I'm not trying to be too picky here, but the story  
6 could be false in two ways: number one, Nelvis didn't  
7 testify to that in front of the grand jury; number two, the  
8 thing he supposedly testified to never happened.

9 A I think -- my recollection is both things were  
10 true. Both -- I think it started with the second and  
11 therefore at least implied the first, a, that it didn't  
12 happen and therefore he didn't testify to it

13 Q Okay.

14 A But, you know, I don't have real recollection of  
15 exactly what was said, other than the story was wrong, bad,  
16 and that they were trying to correct it and that he didn't  
17 say the things that had happened and therefore he couldn't  
18 have testified to them.

19 Q Who told you that at the meeting? Do you remember?

20 A One of the counsel's people, but I'm not positive.  
21 I think maybe Ms. Mills, but I'm not positive.

22 Q Other than that incident, either at these twice  
23 daily meetings or anywhere else, you have not received a  
24 briefing on what any witness told an OIC investigator or FBI  
25 agent or the grand jury?

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1 A That's correct. You raised one issue with me the  
2 last time I was here which I talked with my lawyer about. I  
3 don't know whether that question implies that --

4 Q Are you talking about the meeting back in the  
5 summer of '97?

6 A No.

7 Q Okay. What are you referring to?

8 A You asked me about Mr. Hilley the last time I was  
9 here.

10 Q Okay.

11 A And I told you I had a conversation with my lawyer  
12 about Mr. Hilley.

13 Q Okay. Other than that incident and the Mills  
14 incident or the -- I'm sorry, the Nelvis incident that might  
15 have been Ms. Mills.

16 A It could have been Mr. Ruff or Ms. Mills, I'm not  
17 sure which lawyer said it, but it was one of the lawyers. I  
18 guess I feel that I can be reasonably categorical that they  
19 don't discuss what witnesses are saying in the grand jury  
20 with us.

21 Q Okay.

22 A Our counsel's office staff.

23 Q Are you aware that such debriefing is going on by  
24 somebody in the White House? And, again, I'm not implying  
25 there's anything wrong with that. Are you aware that it is

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1 going on with at least some witnesses?

2 A I know that it's common practice, but I don't know  
3 much beyond that I don't know specific facts.

4 Q Okay. Are you aware that somebody is doing that?

5 A I've read that in the newspaper, but, as I said,  
6 I don't have specific facts that I can tell you that lawyer  
7 X talked to lawyer Y or talked to witness Z.

8 Q I think it's been in the newspaper and I think  
9 Mr. McCurry has acknowledged that it goes on. I'm not  
10 positive about that. But what I'm asking you is even if  
11 you're not told about X lawyer, are you aware that there are  
12 some people either at the White House or acting on behalf of  
13 the White House other than what you've read in the press that  
14 one of their jobs is to debrief --

15 A I guess I assume it, but I don't know it.

16 Q Okay. To debrief witnesses. Just to finish the  
17 question.

18 A Debrief witness --

19 Q Who have either been to the grand jury --

20 A That would be --

21 Q Well, when I say witness, I'm including --

22 A I guess I don't even assume that. I assume that  
23 some of the lawyers are taking to some of the other lawyers,  
24 but beyond that, I don't -- I mean, that's kind of standard,  
25 common practice.

Page 3:

1 Q And that would be an indirect way to find out what  
2 a witness had told an investigator. Is that correct?

3 A I assume that the lawyers talk to lawyers which is  
4 standard common practice but beyond that I don't know

5 Q Okay. Well, what I was starting to say earlier wa  
6 that my definition of witness would include a witness who had  
7 been in the grand jury or who had talked to an OIC  
8 investigator, so I just wanted to make sure what it is tha  
9 you assume. You don't know anything, you haven't been tol  
10 anything other than what you've read in the press.

11 What is it that you assume goes on? That some  
12 lawyers in the White House talk to some layers for witnesses?

13 A Yes.

14 Q Okay: And would you also assume that they would be  
15 talking about, among other things, what the witness said or  
16 was asked, either by an investigator or at the grand jury?

17 A I would be -- I guess I would assume that, but I  
18 don't know that.

19 Q Okay, Do you know based on anything, including  
20 what you've read in the press or what you've deduced from  
21 that what individuals in the White House might be receiving  
22 that information, directly or indirectly? That is to say  
23 receiving information about what witnesses have told the OIC  
24 or the grand jury?

25 A Well, I would assume it would -- I'm like totally

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1 speculating. Do you want me to go ahead and speculate?

2 Q Yes. Because you're in a better position to do  
3 that than we are because you work in the White House.

4 A I will speculate and think that it would either be  
5 Mr. Ruff, Ms. Mills, maybe Mr. Breuer, who is the Associate  
6 White House Counsel. Maybe Mr. Lindsey.

7 Q Okay. Do you know whether or not that information  
8 has been imparted to Mr. Kennedy?

9 A I don't know.

10 Q Okay.

11 A Mr. Kennedy usually works up some response, much of  
12 which is not about facts, but only that we're not going to  
13 respond to the facts until the investigation is concluded or  
14 something, but he clears that with Mr. Ruff before he says  
15 anything.

16 Q Okay. Do you know whether or not he would be,  
17 based upon your speculation, because I asked you whether or  
18 not that would be shared with him, do you know whether or not  
19 that would be natural in the course of things the way the  
20 counsel's office works that he would be one of the ones who  
21 could be being debriefed about witness testimony?

22 A By outside lawyers or witnesses?

23 Q Yes. Directly or indirectly.

24 A I would think that would be unusual. I wouldn't  
25 think so. I don't think they would.

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1 Q Okay. It would be more likely -- that scenario, it  
2 would be more likely that you would hear it from a front tier  
3 team such as Mills, Ruff, Breuer or somebody like that.

4 A Right.

5 Q Do you know if Mr. Breuer ever talks to the press?

6 A- Well, I know he has on occasion in the campaign  
7 finance matter. I don't know whether he's talked about this  
8 matter to the press.

9 Q On or off the record?

10 A On or off the record.

11 Q Are there sub-meetings of these twice daily  
12 meetings that you ever attend that deal with the same subject  
13 matter?

14 A Sub-meetings?

15 Q Right You talked about in the past kind of  
16 hallway conversation when you bump into somebody --

17 A Oh, if I think it's something that's hot, you know,  
18 people might raise it.

19 Q But I meant something more formal, a smaller group  
20 than meets in the twice daily meetings.

21 A No. Not -- no, not really. The only thing I could  
22 remember that's sort of like that is when Judge Johnson  
23 unscaled the order in the executive privilege case, there was  
24 sort of a slightly -- there was the lawyers plus a couple of  
25 others, myself, I think there was like a pre-meeting with --

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1 they knew I was a lawyer. I think for that purpose they  
2 invited me in to see how we should respond to that.

3 Q All right. How you should respond to the  
4 unsealing?

5 A To the unsealing and then after -- I think the next  
6 day we then discussed a little bit -- they got our opinion, a  
7 slightly larger group, Begala was there, myself. I don't  
8 think Mr. Emanuel was there, but I think -- Joe Lockhart was  
9 there.

0 They got our view about -- they asked for our  
1 advice about what, if anything, to appeal and whether it  
2 mattered whether they appealed executive privilege versus  
3 attorney-client privilege from a public relations and  
4 press perspective. We gave our opinion. We then left  
5 and they had a discussion about what legal advice they  
6 wanted to give to the President and I didn't participate  
7 in that.

8 Q They being the lawyer only group.

9 A The lawyer only group. Right.

0 Q I think I've told you -- certainly this was  
1 implicit in your instructions that witnesses -- or the ones  
2 that you got to first time you were here -- that witnesses  
3 in front of the grand jury are not bound by secrecy.  
4 Witnesses are free to tell anybody what happens in the grand  
5 jury.

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1 I'm giving you this by way of a preface to my next  
2 question because I'm going to use the word leak and I want to  
3 be clear that for my question, I'm not confining leak to  
4 6(e) violation. Do you understand?

5 A Yes.

6 Q I'm referring to leak as just basically any non-on  
7 the record discussion with the press. Is that clear?

8 A Yes. Well --

9 Q Any off-the-record or background discussion with  
0 the press that involves the giving of information.

1 A I think that I might quarrel with you, but I  
2 understand what the basis of your question is.

3 Q All right. You understand --

4 A I think when people speak on background and  
5 somebody says "A White House official said," I wouldn't call  
6 that a leak.

7 Q Okay. All right. Let's confine it to background,  
8 the.

9 A Or off the record.

0 Q Off the record. And my question is are you aware  
1 of any effort to let's say leak or disclose, again not saying  
2 in and of itself that there's a problem with that, any  
3 efforts to leak or disclose off the record grand jury  
4 information by anyone at or acting on behalf of the White  
5 House?

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1 A No.

2 Q Okay. Has there ever been an occasion when a White  
3 House spokesman blamed the oic for a grand jury leak when you  
4 had information either first or second-hand that it came from  
5 somebody acting by or on behalf of the White House?

6 A No.

7 Q Okay. Are you aware of any effort to in any way,  
8 shape or form attack the credibility of a person by the name  
9 of Ashley Raines?

0 A No.

1 Q There was a story a while back early in the  
2 investigation about Ms. Raines and what she did or didn't  
3 tell investigators. It had a line at the end that said  
4 something to the effect of "Sources at the White House  
5 indicated they're prepared to attack her credibility" and  
6 that's the basis of my question. You have no knowledge of  
7 any such effort?

8 A I have no knowledge of any such basis to attack her  
9 credibility.

0 Q And do you have any knowledge of who might have  
1 told that at the White House to -- and I don't want you to  
2 speculate, do you have any knowledge first or secondhand of  
3 who might have imparted that information if anybody to --

4 A To a reporter?

5 Q Yes.

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1 A No. Do you know what the reporter was?

2 Q I can't remember.

3 A But the answer is no.

4 Q All right. You have talked about -- we were going  
5 chronologically last time and you talked about your  
6 conversation with -- you were talking about what was going  
7 on --

8 THE FOREPERSON: Just another five minutes and then  
9 we need to take a break.

10 MR. WISENBERG: Oh, okay. Do you want to do it  
11 now? I'm kind of at a natural segue point.

12 THE FOREPERSON: Okay. Why don't we take a break?  
13 A little ten-minute break and then we'll be right back.

14 THE WITNESS: Ten minutes?

15 MR. WISENBERG: Yes. We'll come get you. Thanks.  
(Witness excused. Witness recalled.)

16 MR. WISENBERG: Let the record reflect the witness,  
17 John Podesta, has reentered the grand jury room.

18 Madam Foreperson, do we have a quorum?

19 THE FOREPERSON: Yes, we do.

20 MR. WISENBERG: Are there any unauthorized human  
21 beings in the grand jury room?

22 THE FOREPERSON: There are no unauthorized beings  
23 period in the grand jury room.

24 MR. WISENBERG: Okay.

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1 THE FOREPERSON: Mr. Podesta, you are still under  
2 oath.

3 THE WITNESS: Thank you.

4 BY MR. WISENBERG:

5 Q Okay. We had been talking chronologically last  
6 time about instances in the early days after the Post article  
7 when the President denied the allegations to you in various  
8 forms and we talked about three such incidents, not counting  
9 statements being cleared for lawyers. And we were also kind  
0 of going along chronologically about how things were  
1 happening.

2 Are there any other instances where the President  
3 either denied to you any of the allegations about the  
4 Lewinsky matter or where you heard him deny to others,  
5 excluding statements, press statements, you know, statements  
6 on television programs and radio interviews, things like  
7 that?

8 A I had one conversation with him, to go back into  
9 the week, the story breaks on Wednesday, we talked about  
10 that, and then Thursday he did some press and he has a press  
11 availability, I talked to you about my conversation on  
12 Friday. I remember talking to him on Sunday before the  
13 of the union.

14 Q Okay.

15 A And he was in a -- we, I think, had come by really

<p style="text-align: right;">Page 41</p> <p>1 to get him to go over and to do a state of the union prep 2 session.</p> <p>3 Q Okay.</p> <p>4 A But I think we also told him at that time that we 5 had arranged ourselves kind of in the manner that we have 6 just been previously going over, that Chuck was going to meet 7 with the lawyers and then we had a communications meeting, we 8 were going to try to work through this, he needed to get up 9 there.</p> <p>10 You know, again, we're trying to -- he was down 11 in those days prior to that. Keep your spirits up, the 12 state of the union was really good, the stuff that was in 13 it was really good and that we were kind of preparing to 14 deal with that and how we would handle Sunday's show and 15 this and that.</p> <p>16 And I remember at the time in that setting he 17 basically had kind of a little bit of a change, I think, of 18 spirit. I think he was -- he said he had had the first 19 decent night's sleep he had had and that he was -- I think 20 angry at that meeting and said -- basically, I think, 21 repeated the denial and said "I'll fight this and we're 22 going to get through it and I'm going to do this." And his 23 spirits were just sort of different.</p> <p>24 I don't think there was anything substantively 25 different, there were a couple more people in the room, but</p>	<p style="text-align: right;">Page 4</p> <p>1 lawyers and I'm not going to substantively get into it.</p> <p>2 Q What do you actually remember about the words he 3 spoke at this Sunday prep session?</p> <p>4 A I really remember more the tone than the words. 5 don't think he added anything substantively to the previous 6 conversations I had had with him on Friday. He probably said 7 less, but it was a different -- Friday, I thought he was -- 8 you know, he just seemed really down and wasn't sure exactly 9 what was going to happen. And by Sunday, I think he was back 10 to, you know, the person I'm more used to dealing with</p> <p>11 Q And I think you had said on Friday, there were two 12 conversations on Friday. I think one you were pretty certain 13 was Friday morning and the other you thought was Friday 14 afternoon, but you weren't as certain that it was on that 15 day.</p> <p>16 A Right.</p> <p>17 Q There was more detail in those conversations in the 18 sense that -- or there was some detail. I think the one in 19 the afternoon, I think, you correct me if I'm wrong, you 20 mentioned the specifics about -- when you got into the issue 21 of the press reporting the number of visits, he gave you 22 response that had to do with Monica visiting Ms. Currie, if 23 you recall and then in the morning, I think in that morning 24 discussion you had said he denied having sex in any way, 25 shape or form.</p>
<p style="text-align: right;">Page 42</p> <p>1 that's the only other -- that's a conversation I remember.</p> <p>2 Subsequent to that, we've been largely in the -- 3 you know, in the mode of doing this kind of Q&amp;A prep session.</p> <p>4 We don't talk about the specifics of the case.</p> <p>5 Q Okay. What do you mean, Q&amp;A? Prepping for 6 questions that would he asked --</p> <p>7 A Questions, press questions.</p> <p>8 Q Okay.</p> <p>9 A Here's the questions --</p> <p>10 Q About the Lewinsky matter?</p> <p>11 A About the Lewinsky matter or about the Independent 12 Counsel or about whatever -- whatever is the topic du jour 13 that the press corps is asking about. There's always 14 something.</p> <p>15 And we're in a pretty standard "we're not talking 16 about this" mode, so from the perspective of briefing him, 17 it's more -- really, the goal is to let him know what 18 questions are likely to be shouted at him so they don't seem 19 surprising to him when he's standing -- he'll be making an 20 announcement in the Rose Garden and someone is yelling, you 21 know, did you read Steven Brill's article, what's your 22 comment, he --</p> <p>23 Q He'll be ready.</p> <p>24 A He'll at least have kind of heard the question 25 before, but the standard response now is deferring to the</p>	<p style="text-align: right;">Page 4</p> <p>1 So there's some detail there that goes beyond the 2 "I didn't have sex and I didn't tell her to lie." And my 3 question to you is is there a repetition of the more detailed 4 stuff on Sunday or is it closer to the early kind of more 5 general denial, "I didn't have sex and I didn't tell anyone-- 6 to lie"?</p> <p>7 A I think the latter.</p> <p>8 Q Okay.</p> <p>9 A That's my recollection.</p> <p>10 Q Okay. You said he was angry. Who or what was he 11 angry at, if you can tell us, on Sunday?</p> <p>12 A You -- not you personally --</p> <p>13 Q Not me personally, but Judge Starr?</p> <p>14 A Probably Judge Starr, but I think the blending 15 is of the Paula Jones case which I think he always felt was 16 motivated by people out to attack him and attack his 17 presidency and the Independent Counsel investigation and 18 the kind of cross-over about those things.</p> <p>19 I think he thought it was unfair and, you know, 20 he's used to getting hit but I think some things he thinks 21 are unfair and I think he thought this was -- the blending 22 of these two matters was unfair.</p> <p>23 Q And he articulated that blending concern on Sunday?</p> <p>24 A I may be speculating a little bit, but I think 25 he -- I think that's his view.</p>

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1 Q Okay.

2 A I may be speculating a little bit about whether he

3 was that explicit in the conversation. As I say, **the one**

4 **thing I remember** about the conversation was that he had --

5 his mood had changed to **some extent** from being down and sort

6 of -- I don't know a different word to express it, but --

7 about the story and **where** it was and, you know, **his feelings**

8 **that** it wasn't true, but **being unsure** about how to handle it

9 really publicly, to one in which he was just a little bit

10 more -- he was angry, I think.

11 Q Okay.

12 A But I don't specifically remember the language he

13 used or **whether** he said, you know, be pinned this on the OIC.

14 Q Okay.

15 A At that time.

16 Q Has anybody other than -- I'm not interested in

17 getting at the content of any conversations you had **with** your

18 lawyer through this, **through what** I'm going to ask you, but

19 **has anybody reached out to you, anybody by or on behalf of**

20 **the White House since** you got your first grand jury subpoena

21 talked to you **about** your testimony?

22 A Only about legal issues. I would describe it as

23 legal issues.

24 Q Whether or not to invoke certain privileges?

25 A **Yes.**

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1 Q Okay. There was nobody other than your attorney

2 who you've discussed -- well, you've mentioned there's a

3 matter having to do **with Hilley**, with information you got

4 apparently **indirectly** from Mr. **Hilley** or **his** attorney and

5 we've talked about that.

6 Other than that, has there been any effort to

7 **directly** or indirectly talk to you by anybody **other** than your

8 lawyer about your testimony? By anybody **whether** with the

9 White House or not.

10 A **Just reporters.**

11 Q Okay. Other than reporters?

12 A No. And I haven't discussed it with reporters.

13 Q **All** right. Now, are you part of an information

14 sharing **agreement**? That is, have you authorized your

15 **attorney to be part of any agreement** by which you share --

16 and I'm not suggesting one way or the other whether that's

17 proper or improper -- to share with other attorneys

18 information **that** you have given **either** to our investigators

19 or to the grand jury?

20 A I'd have to check with him about that answer.

21 Q Okay. And, **again**, I'm not asking about **the** content

22 of that, but just --

23 A I understand.

24 Q -- are you part of that. What's sometimes called a

25 joint defense **agreement**, but I don't want to get hung up on

1 labels, so I'll say information **sharing agreement**. And I'll

2 let you -- do you want to talk with your **attorney** before you

3 answer that?

4 A **Mm-hmm.**

5 Q And we'll just defer that until right before we're

6 done.

7 A Okay. Great.

8 Q I'll defer that.

9 A So the question, though, was have you authorized

10 **any information sharing agreement on behalf of myself with my**

11 **attorney**?

12 Q Right. Have you authorized it or **are** you part of

13 any, **where** you would be -- **where** your attorney could **tell**

14 **others what you have said and you could learn what others**

15 have said, without **respect** to what it is, you know, the

16 content of it.

17 Have you talked to **anybody** at the **counsel's office**

18 about your **testimony other than the** issue of **when** you would

19 invoke **the privilege**? About **the** substance of your testimony,

20 expected or completed.

21 A I did not discuss the completed testimony. I think

22 **that --** I've told you **we've** had **discussions** about **whether** to

23 invoke initially executive privilege **and** then **attorney-client**

24 privilege and **there's been** some texture **to** that **discussion**,

25 but that's it.

1 Q Okay.

2 A **So if you're** excluding those conversations, I **think**

3 the answer is that I don't **recall** any other conversations

4 Q Okay. Texture, **define texture.**

5 A **Well, when I was last here, we had one specific**

6 **meeting in mind and there was -- since I already, I think**

7 identified that **Mr. Ruff** was **part of that meeting**, Mr. Ruff

8 **knew what the meeting was, so we talked about that and**

9 **whether there was a privilege question.**

10 Q **Oh, the July meeting**, you're **talking** about?

11 A **Yes.**

12 Q Okay.

13 A **I mean, so -- I mean, I think that you can't do**

14 this completely in an abstract fashion.

15 Q Completely theoretically.

16 A **Right.**

17 Q Okay. **Bruce** Lindsey, we talked about him a little

18 bit.

19 A Mm-hmm.

20 Q He's a senior advisor to the President.

21 A correct.

22 Q And a member of the counsel's office.

23 A That's correct.

24 Q A long-time friend and associate of the President.

25 A Right.

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1 **Q** What discussions have you had with him since the --  
 2 let's go back chronologically. You told us about your  
 3 discussions with him on the day of the deposition, both with  
 4 Ms. Mills and then later with Mr. Lindsey. What discussions  
 5 have you had with him about the Monica Lewinsky matter since  
 6 that time?

7 **A** Other than his participation to some extent in  
 8 these press meetings, I don't recall having any other  
 9 specific kind of fact based conversations with him. Now, he  
 10 sits in sometimes, he's been ill for a while so he hasn't  
 11 been there very much, but sometimes he sits in on the kind of  
 12 public relations -- what I've described as public relations  
 13 meetings.

14 **Q** And those meetings don't have directly to do with  
 15 John Podesta issues individually, correct?

16 **A** That's correct.

17 **Q** All right. So your conversation you talked about  
 18 last time that you spoke with him after the deposition and  
 19 you mentioned that there had been questions about Monica  
 20 Lewinsky. Is that correct?

21 **A** Yes.

22 **Q** That's the last substantive conversation you've had  
 23 with him about the Monica Lewinsky matter?

24 **A** I think so. That I can recall.

25 **Q** All right.

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1 **A** I mean, again, other than this kind of group  
 2 meeting context in which Bruce rarely says anything.  
 3 So I don't remember him saying anything about it and  
 4 I wouldn't describe that as a conversation between the  
 5 two of us really.

6 **Q** The kind of three things, three areas where  
 7 you interfaced, not personally, but in the broadest sense  
 8 of the word, with the concept of Monica Lewinsky prior to  
 9 the calls you got on deposition Saturday, we've talked  
 10 about those, the first is the mess&e from Bowles to the  
 11 President in -- I think you said it was in the late spring  
 12 of 1997.

13 **A** Yes. Late spring, early summer. I can't place it  
 14 exactly.

15 **Q** Right. The second is the Betty Currie approach  
 16 that led to your approach to Bill Richardson.

17 **A** Correct.

18 **Q** And the third is the John Hilley assignment from  
 19 Erskine Bowles.

20 **A** Right.

21 **Q** You've talked about a brief conversation with  
 22 Mr. Bowles along the lines of "I don't think we did anything  
 23 wrong."

24 **A** Right.

25 **Q** And I'm not interested in conversations with your

1 attorney.

2 **A** Right.

3 **Q** And we've talked a little bit about the approach  
 4 from the Hilley people. Have you spoken with anybody else  
 5 about -- or has anybody else spoken with you about since the  
 6 story started breaking -- I'll say since the Saturday call  
 7 of the deposition -- about those three areas?

8 **A** I don't recall having any conversations other than  
 9 reporters asking me and my not answering.

10 **Q** Okay.

11 **A** I don't think so.

12 **Q** Okay. Has the President of the United States in  
 13 any way, shape or form talked to you about any of those  
 14 incidents, those three incidents?

15 **A** Yes.

16 **Q** Okay. Tell us about that.

17 **A** We had just nominated Mr. Richardson -- we didn't  
 18 nominate him, we just announced our intention to nominate  
 19 Mr. Richardson to be the Secretary of Energy, and we had an  
 20 extremely brief conversation about this in which -- and I do  
 21 a lot of personnel stuff and I do some of the confirmation  
 22 issues.

23 And I said to him as we were discussing the merits  
 24 of the Richardson nomination that I thought that the Lewinsk  
 25 issue -- I don't think I probably said much more than that --

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1 I was potentially a question that would be raised in the  
 2 context of his confirmation bearing.

3 And he said to me, he said, "Well, as I understand  
 4 it," and that was from reading the papers, he said, "He  
 5 didn't do anything wrong, did he?" And I said, "I don't  
 6 think so, but you should get a briefing from Chuck about that  
 7 and you and I shouldn't discuss the facts of this matter. It  
 8 would be better to deal with Chuck on that."

9 And then we discussed the merits of the Richardson  
 10 nomination from his experience in New Mexico and what he was  
 11 doing at the U.N. and who were going to replace him at the  
 12 U.N. with, but we had a kind of fleeting conversation about  
 13 this. I pointed it out as a place where there could be an  
 14 issue in a confirmation fight and suggested that he talk to  
 15 counsel about it. Factually.

16 **Q** Did you specifically discuss anything about your  
 17 interaction with Richardson about Monica Lewinsky?

18 **A** I think this was a sentence or two worth and I  
 19 don't remember more than really what I have just said. You  
 20 know, that I asked him whether he -- I may have said that --  
 21 but I don't even think I said that much.

22 **Q** What you're telling us today, and this is, I take  
 23 it, fairly recently --

24 **A** I think he knew what the issue was, it's fair to  
 25 say. I mean, there's been a lot of press about it But I

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<p>1 identified it as an issue that could be a controversy, that  2 he could be questioned about in <b>the</b> context of confirmation  3 hearings, but we didn't discuss the merits of it or what I  4 <b>knew</b> about it or what I did  5 Q Okay. I think you said there's been some press  6 about it, about the fact that you went to Ambassador  7 Richardson on Ms. <b>Lewinsky's</b> behalf?  8 A Well, I probably wouldn't characterize it that way,  9 but, yes.  10 Q Or on Betty <b>Currie's</b> behalf?  11 A Well, I've testified to this.  12 Q I know you've testified to it, but has there been  13 press about it?  14 A Yes.  15 Q Okay. And the -- I mean, I <b>know</b> the ambassador  16 issued a statement very early on about it also, some <b>kind</b>  17 of a statement about Ms. Lewinsky. So I take it your  18 <b>assumption is he knew what you were talking about, but there</b>  19 was no <b>specific</b> reminder to <b>him</b> or discussion, you know,  20 "Mr. <b>President, remember</b> I had a conversation myself with  21 Ambassador <b>Richardson</b> about Ms. Lewinsky."  22 A <b>I think this was transacted in a sentence or two</b>  23 <b>and I think he knew what I was talking about, I knew what I</b>  24 <b>was talking about, and I think he said, "Well, he didn't do</b>  25 <b>anything wrong, did he?"</b></p>	<p>1 Q Okay.  2 A I'm sure they've appeared in the newspaper.  3 Q Okay.  4 A And that's the only context in which I've seen a  5 <b>copy</b> of it.  6 Q All right. And you have no idea who authored  7 those?  8 A I have no idea who authored those.  9 Q I believe you testified that you're old friends  10 <b>with Ms. Currie.</b>  11 A That's <b>correct.</b>  12 Q You all <b>go</b> back how far?  13 A I think we met in '78 and we worked closely  14 <b>together then.</b>  15 Q <b>And</b> that was in the Carter administration?  16 A Yes.  17 Q That was at ACTION?  18 A Yes.  19 Q And <b>ACTION controlled, among other things, VISA --</b>  20 <b>A VISTA, Peace Corps.</b> At that time, it was -- Peace  21 Corps is <b>separate</b> now, but it was <b>VISTA, Peace Corps</b> and  22 <b>Older American Volunteer Programs.</b>  23 Q And what was her position there?  24 A <b>She</b> was the executive assistant to the director.  25 Q Okay. Is that a similar position to what she has</p>
Page 54	Page 56
<p>1 And I said, "Look, you and I shouldn't have a  2 factual discussion about this. You should deal with <b>Chuck</b> on  3 it."  4 Q All right Any other time that you have spoken  5 with the President about these <b>three</b> Monica related events in  6 <b>your life that took place before Monica Lewinsky became a</b>  7 household word?  8 A I don't think so, but I'm cautious about this.  9 Q To the best of your recollection.  10 A <b>To the best of my recollection, I don't think so.</b>  11 Q All right. Have you heard of the talking points?  12 A <b>Yes.</b>  13 Q Do you know <b>either firsthand</b> or through secondhand  14 <b>or thirdhand</b> who wrote them?  15 A No.  16 Q Did you write them?  17 A <b>No.</b>  18 Q Okay. You know what I refer to, though, when I  19 talk about --  20 A You're talking about <b>the Linda Tripp/Lewinsky</b> set  21 of talking points.  22 Q <b>Right.</b>  23 A No.  24 Q Have you ever seen a copy of them?  25 A I think they've appeared in the newspaper.</p>	<p>1 now?  2 A_ Yes.,  3 Q Okay. Lot of responsibility?  4 A <b>Yes.</b> I mean, she's kind of a top level-executive  5 <b>secretary.</b>  6 Q Okay. <b>Very</b> competent at what she does?  7 A <b>Yes.</b>  8 Q Okay. Considered to be an intelligent person?  9 A Yes.  10 Q Capable?  11 A <b>Yes.</b>  12 Q Okay. How would you describe <b>her</b> reputation among  13 the people you work with?  14 A Excellent  15 Q As an overall matter, excellent?  16 A I think people are very -- both professionally and  17 personally, <b>very</b> attached to her.  18 Q Okay. What is her reputation for truth and  19 veracity?  20 A High.  21 Q How close are you with Sidney Blumenthal?  22 A I've known him a long time. I used to work <b>w</b>  23 his wife and I would say we're friendly. Friends.  24 Q Okay. Not close friends?  25 A We're not close friends, but we're friends. 1 <b>sort</b></p>

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<p>1 of get a kick out of him. He has a new theory about all 2 this.</p> <p>3 Q All right. Okay. Did you ever have a 4 discussion -- well, you've kind of answered my question. I 5 was going to ask you have you ever had a discussion with him 6 about the Monica Lewinsky matter.</p> <p>7 A Yes.</p> <p>8 Q Okay. Let me distinguish between factual and 9 press, the kind of discussions you're talking about. I think 0 you've mentioned be's at the meetings. Is he at the meetings 1 sometimes?</p> <p>2 A Yes. Yes, sometimes.</p> <p>3 Q Let me distinguish between kind of strategy and 4 facts, not that they're mutually exclusive. Have you ever 5 had a factual discussion with him about the case in which he 6 related to you something, for instance, just as an example, 7 "I saw Monica Lewinsky at the White House on three 8 occasions." Have you ever had that kind of a conversation 9 with him? -</p> <p>0 A I don't think I've ever spoken with him factually 1 about Monica Lewinsky.</p> <p>2 Q Or about the Monica Lewinsky matter.</p> <p>3 A Well, the only thing that I can recall is after one 4 of his grand jury appearances he said to me that -- he said, 5 "Your name came up in my grand jury testimony." I said,</p>	<p>1 discussions you've had with the President -- I think you've 2 now identified four conversations with the President, 3 he gave denials in various forms. Again, not counting on 4 signing off on statements for the press or any press 5 appearances where you saw him; four occasions where he 6 gave denials, the President gave denials. Do you know 7 whether or not Mr. Blumenthal was present for any of 8 those?</p> <p>9 A I'm fairly certain he wasn't</p> <p>10 Q Okay. I think two of them you were alone with the 11 President. Is that correct? The conversations that were on 12 the 23rd --</p> <p>13 A The first one I was definitely alone with the 14 President and the second one, my recollection was it was a 15 kind of one-on-one conversation, but I can't remember 16 whether -- sometimes, you know, in the Oval Office you can 17 have a one-on-one conversation where there are other people 18 in the Oval Office.</p> <p>19 Q All right. So would it be fair to say the only one 20 he might have been at was the fourth one you've talked 21 about --</p> <p>22 A No, I don't think he was there. I mean, he could 23 have been, but I don't --</p> <p>24 Q All right. You have no recollection that he was 25 there.</p>
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<p>1 "Oh?" He said, "I said you were a law professor." And I 2 said, "Thanks a lot, Sid." And that, I think, was the end of 3 that conversation." So I guess that constitutes facts:</p> <p>4 Q All right. There's no Other factual conversation 5 you've had with him.</p> <p>6 A Well, that's kind of a broad question.</p> <p>7 Q Yes, it is. Let me try to rephrase it. Any kind 8 of --</p> <p>9 A He's never given me --</p> <p>0 Q Evidentiary.</p> <p>1 A -- evidentiary information, I think, about the 2 underlying facts of this.</p> <p>3 Q Okay. All right.</p> <p>4 A He spins a lot of theories about kind of what's 5 going on.</p> <p>6 Q He's never said, "I've talked to Bruce Lindsey and 7 Bruce Lindsey says this about what was going on with Monica." 8 A Not that I recall at all.</p> <p>9 Q He's never said, "I've talked to Vernon Jordan and 0 Vernon Jordan says this about Monica."</p> <p>1 A No.</p> <p>2 Q Has he ever said, "I've talked to President Clinton 3 and President Clinton says this about Monica Lewinsky." 4 A No.</p> <p>5 Q Okay. Was he ever present in any of the</p>	<p>1 A I'm fairly certain he wasn't there, but I'm not 2 100 percent certain he wasn't there.</p> <p>3 Q And you talked to him about his theories of the 4 case.</p> <p>5 A Right.</p> <p>6 Q You are not responsible for his nickname GK, are 7 you?</p> <p>8 A No.</p> <p>9 Q Okay.</p> <p>10 A I don't know if anyone's taken credit for it.</p> <p>11 Q Okay. And, again, the general questions you've 12 answered previously about what goes on at the meetings, the 13 briefings, that you're aware of or apparently primarily not 14 aware of testimony, you have no particular -- they would all 15 cover Mr. Blumenthal, too, since he works at the White House.</p> <p>16 Any questions I've asked you about what people -- 17 do you know of any people acting by or on behalf of the White 18 House, things like that. I mean, Blumenthal works at the 19 White House, your answers would cover him, too.</p> <p>20 A To speak to witnesses? Is that the question you're 21 asking?</p> <p>22 Q As an example, debriefing witnesses, things like 23 that.</p> <p>24 A I don't think he's done that, but I don't know.</p> <p>25 Q Okay. All right. You're unaware of him having</p>

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1 either debriefed or gotten information about the debriefing  
 2 of witnesses. Is that correct?  
 3 A Yes.  
 4 Q All right. And I take it you're unaware of him  
 5 making any disclosures to anybody about what witnesses hav  
 6 said to investigators or to the grand jury. Is that correct  
 7 A That's correct  
 8 Q All right. Do you know of any interaction he might  
 9 have had with any private detectives?  
 0 A No.  
 1 a Do you know of any private detectives hired by o  
 2 on behalf of -- other than what you've read --  
 3 A Sidney's got his own case going, so I don't know  
 4 what he's done there.  
 5 Q What do you mean by that?  
 6 A He's suing Drudge.  
 7 Q Oh, okay. Okay.  
 8 A So I have no idea what he's doing there.  
 9 Q Okay. All right. Are you aware of --  
 0 A That's on a separate matter.  
 1 Q Right. Right. A libel matter.  
 2 A Alibelmatter. Right.  
 3 Q Have you -- are you aware, other than what you've  
 4 read about in the press or heard about in the press, aware of  
 5 any efforts by or on behalf of the White House to hire

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1 private investigators with respect to the Lewinsky matter?  
 2 A No. I have read in the press about that and there  
 3 was some back and forth about what McCurry could say about it  
 4 and then he has said what he has said.  
 5 Q All right.  
 6 A And that's basically all I know.  
 7 Q All right. So you know what he said and you knew  
 8 there was a discussion about whether he could say that.  
 9 A Right.  
 0 Q All right. One of these discussions with press  
 1 people and lawyer people?  
 2 A Yes.  
 3 Q Okay. And, if I'm not mistaken, he said something  
 4 to the effect of there had been some -- there have been  
 5 some --  
 6 a I think he said there have been no -- I think --  
 7 my recollection is a little hazy. I think we've said that  
 8 there have been no lawyers hired to investigate prosecutors.  
 9 Q Okay. About private matters?  
 0 A Maybe about private matters. I don't know.  
 1 Q All right. You don't know anything beyond -- you  
 2 have heard no facts beyond what Mr. McCurry's statement is.  
 3 A Correct  
 4 Q Okay. Have you ever had any conversations with  
 5 the First Lady about -- let's first confine it to the

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1 evidentiary -- evidentiary type conversations with her  
 2 concerning the Lewinsky matter?  
 3 A I've not had any conversations with her, I think  
 4 about the evidentiary matter.  
 5 Q Okay. Has she been involved in any strategy type  
 6 discussions or any of these -- well, let's just leave it at  
 7 that.  
 8 A She does not participate in any of these meetings  
 9 and I don't know that she's participated in any kind of  
 10 strategy discussions with the group of people I'm talking  
 11 about  
 12 Q Okay. What is her role, to the extent that you  
 13 know of it, in connection with the Lewinsky matter?  
 14 A I've had a couple of brief conversations with her  
 15 and I suspect she may have talked to other people in the same  
 16 vein that, you know, people needed to stay pumped up and get  
 17 out there and fight back and just essentially, you know, what  
 18 I would describe as sessions in which, you know, she's  
 19 encouraged us to not just hunker down and, you know, be proud  
 20 of what the President was trying to do for the country, get  
 21 out there and talk about it.  
 22 Q Okay. Who would you say is in charge of the  
 23 political effort on the Lewinsky matter, responding in the  
 24 press politically? Who is in charge of that?  
 25 A I think ultimately it's Chuck.

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1 Q Okay. All right. Chuck Ruff?  
 2 A Yes. I mean, there again, this is sort of -- to  
 3 some extent, it's kind of a collegial effort, I guess, and it  
 4 depends on the particular issue or the particular matter or  
 5 the particular week. But all of us participate, Begala, Ann  
 6 Lewis, Rahm Emanuel, myself, but in terms of what can be  
 7 said, what can't be said, in the end, Chuck has the kind of  
 8 final say on that.  
 9 Q Okay. But there is this division where on a lot of  
 0 the things having to do with it it's lawyers only, correct?  
 1 A That's correct.  
 2 Q Would you characterize yourself as close to the  
 3 President as Mr. Blumenthal is on a personal level?  
 4 A I don't know how close he is to Mr. Blumenthal on a  
 5 personal level.  
 6 Q Okay. Based on what you know.  
 7 A I feel like -- I've known the President a long  
 8 time, we have a close relationship.  
 9 Q Okay. As far as you know, it would be as close as  
 10 his relationship with Mr. Blumenthal?  
 11 A Yes. I think I have a different sort of  
 12 relationship with him than Mr. Blumenthal.  
 13 Q Okay. How so?  
 14 A Well, I think it's by the nature of my work, I  
 15 suppose, which is mostly I deal with him in a professional

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1 way, on a kind of -- you know, a kind of series of trying to  
2 run the White House.

3 I think Sid tends to spend more time with him  
4 about, you know, big think projects and, you know, kind of  
5 chit chats with him a little bit mom about, you know, the  
6 future of the world than I do.

7 Q All right.

8 A I kind of grind it out more.

9 Q Okay. What about the First Lady? Do you know  
10 whether or not -- would you consider yourself as close on a  
11 personal level with the First Lady as Mr. Blumenthal is?

12 A I think he probably has a closer personal  
13 relationship with her than I do. But I have a warm and  
14 friendly relationship with the First Lady.

15 MR. WISENBERG: Let me show you some stuff.  
16 I think we're near the end, if you'll have a little  
17 indulgence here with me.

18 THE FOREPERSON: It's there.

19 MR. WISENBERG: It is them? Okay. I will just  
20 speed things up very rapidly.

21 Let me give you what's been marked as JDP-1. It's  
22 a copy of what's been marked as JDP-1 from your earlier grand  
23 jury testimony.

24 And let me also give you JDP-2, something I've  
25 marked as JDP-2.

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1 (Grand Jury Exhibit No. JDP-2  
2 was marked for identification.)

3 BY MR. WISENBERG:

4 Q They're both maps of the -- appear to be maps of  
5 the west wing. Is that correct?

6 A Yes.

7 Q JDP-1 of one floor of the West Wing, the floor the  
8 Oval Office is on.

9 A Yes.

10 Q JDP-1 has only one marking made by you previously  
11 and that's in the room labeled 108. You have written down  
12 your initials. Is that correct?

13 A Right. I didn't know it had a room number, but,  
14 yes.

15 Q Okay. And JDP-2 has some writing, descriptive  
16 writing, about certain of the rooms.

17 A Right.

18 Q And that was not made by you, that descriptive  
19 writing. Is that correct?

20 A That is correct.

21 Q I thought I had left a red pen for you up where  
22 are.

23 A I have a green pen.

24 MR. WISENBERG: I had two -- oh, the court  
25 reporter's taken it.

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1 THE COURT REPORTER: I didn't steal it.  
2 (Laughter.)

3 MR. WISENBERG: I want to distinguish between the  
4 writing that is previously on there that you haven't written  
5 and anything new that I have you write a JDP-2 and I might  
6 not have you write anything.

7 THE WITNESS: Okay.

8 BY MR. WISENBERG:

9 Q I want to focus on the hallway which is labeled on  
10 JDP-2 H1 between the Oval Office and the dining room. Do you  
11 see that there? It says H1 on JDP-2?

12 A Uh-huh.

13 Q It should say that.

14 A Yes. Right.

15 Q And the study is off of that hallway and the  
16 hallway leads -- there's a hallway between the dining room  
17 and the Oval Office. Is that correct?

18 A Correct.

19 Q What I want to ask you is how do you typically go  
20 in to see the President? Do you go through the area where  
21 Betty Currie is?

22 A Yes.

23 Q Okay. Where there's a EC?

24 A Right.

25 Q And go through the door that if the Oval Office was

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1 a clock it would be the 1:00 door?

2 A Yes.

3 Q Okay. How often do you go into the Oval Office  
4 through either the 11:00 door up through walkway number 2 or  
5 through this hallway number 1 which would be at 1:00 on the  
6 Oval Office?

7 A [REDACTED]  
8 [REDACTED]  
9 [REDACTED]

10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]

13 [REDACTED]  
14 Q [REDACTED]  
15 A [REDACTED]

16 [REDACTED]  
17 [REDACTED]  
18 Q [REDACTED]

19 A [REDACTED]  
20 [REDACTED]  
21 [REDACTED]

22 [REDACTED]  
23 [REDACTED]  
24 Q Okay. And --

25 A [REDACTED]

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1 **[REDACTED]**  
 2 Q All right. And you go in, your typical way --  
 3 A Would be through Betty's office  
 4 Q Okay. Of the times that you go to the Oval  
 5 Office, what percentage -- and I take it you go in very  
 6 often --  
 7 A Yes.  
 8 Q What percentage of the time do you go in through  
 9 the 1:00 door, the Betty Currie door?  
 10 A Ninety-five.  
 11 Q Okay. Do you ever go in by going through the  
 12 dining room and through this hallway from the dining room to  
 13 the oval Office?  
 14 A Yes, but that would be on rare occasion. And,  
 15 generally, because something going on in the dining room.  
 16 Q Okay. Something's already going on in the dining  
 17 room.  
 18 A Right.  
 19 Q Some event.  
 20 A Or there's going to be some event.  
 21 Q All right.  
 22 A You know, sometimes we'll brief him in the dining  
 23 room and we might enter -- this is marked -- it was George  
 24 Stephanopoulos' office, now it's Rahm Emanuel's office, if  
 25 there is some briefing going on in the dining room or there's

1 little more -- you know, I think, at ease on walking in on  
 2 him, whether it's in the residence or here, so if he wanted  
 3 to, he could probably go the other way, but I would think  
 4 that -- but I think if you asked him that same question, he'd  
 5 probably say 90 percent or 95 percent of the time he'd go in  
 6 that way.  
 7 Q Okay. There's nobody that you know of in the White  
 8 House, and I'm excluding the First Lady, is there anybody you  
 9 know in the White House who would -- well, let me not exclude  
 10 anybody. Is there anybody you know in the White House who  
 11 typically enters through that hallway to go see the  
 12 President?  
 13 A Which hallway?  
 14 Q Hallway 1, between the dining room -- H1 on your  
 15 map between the dining room and the Oval Office.  
 16 A I don't know Rahm's pattern. I would say it would  
 17 be typical for him to go in through Betty's office, but he  
 18 may -- all those offices are connecting. Rahm's office  
 19 connects to the dining room which connects to the hallway  
 20 which connects to the Oval Office.  
 21 Q Okay.  
 22 A And then my office is next to Rahm's, but it does  
 23 not connect. There's no connecting door.  
 24 Q Right.  
 25 A So I have to go out anyway.

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1 to be a briefing that's going to happen in the dining room,  
 2 usually that happens when there's some event staged in the  
 3 Oval, I might go through Rahm's office into the dining room  
 4 and then if you have to go get the President, because he's in  
 5 the Oval office, you might go through that. But that  
 6 would not be a typical way I would enter.  
 7 Q All right. And if you didn't have that kind of a  
 8 situation that you've just described where they are being  
 9 briefed in the dining room, there's going to be something  
 10 that happens in the Oval Office, you would enter through  
 11 that way.  
 12 A That's correct.  
 13 Q Could you just put down right on page 69 of GS -- I  
 14 guess it would be E1.  
 15 A Mm-hmm.  
 16 Q Because that's now Rahm Emanuel's office.  
 17 A Right.  
 18 Q That's just to the left of the dining room,  
 19 correct?  
 20 A Mm-hmm.  
 21 Q And is that typically what people have to do in the  
 22 White House, including the Chief of Staff, or advisors,  
 23 that the typical way they come through is through the Betty  
 24 Currie entrance?  
 25 A Yes. It would be typical. Yes. Mr. Bowles is a

1 Q Do you know what --  
 2 A And I don't know whether he goes in that way or  
 3 not.  
 4 Q Okay. All right.  
 5 A But I would think that beyond Rahm, that would be  
 6 about it. And I don't know what George's pattern was with  
 7 him either.  
 8 Q Why is that atypical for people to go through that  
 9 hallway, the dining room and the hallway?  
 10 A Well, first of all, it's like the back corridor.  
 11 Q Okay.  
 12 A But also I think there's a kind of protocol that  
 13 you don't -- you know, you don't come unless you're announced  
 14 sort of.  
 15 Q Is the study considered a private area for the  
 16 President?  
 17 A Yes.  
 18 Q All right. And is that generally true of the whole  
 19 area, the dining room, study, hallway, Oval Office? They're  
 20 among the most private areas in the White House, in the  
 21 office part of the White House?  
 22 A I think the terms of use -- for example, President  
 23 Bush, I think, used the study as his private study. I think  
 24 the President tends to -- he'll be back there once in a  
 25 while. I've talked about a meeting where I saw him back

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1 there, but he tends to use the Oval Office more.

2 The dining room is used -- I mean, he has lunch  
3 with the Vice President in there once a week. I mean, he  
4 uses it as a din@ room. And kind of as a briefing room.

5 To give some context to this, when the President  
6 does a live radio address, he does it in the Oval Office.

7 [REDACTED]  
8 [REDACTED]

9 Q Okay. What do you consider -- exclude the  
10 residence, what do you consider the most private room in the  
11 office part of the White House? If you had to pick the most  
12 private room.

13 A Well, I think basically the area we're talking  
14 about, but I would probably include the Oval Office in that.  
15 I mean, obviously when he's not there, the door's open and  
16 people look in, but --

17 Q Right. And you said the area we're talking about,  
18 that would be Oval Office, dining room, study and the  
19 hallway.

20 A Right.

21 Q Okay. What about this area, and I'm near the very  
22 end, what about this area outside -- I don't really think you  
23 can see it well on the map, but the area outside of the  
24 study, the patio area.

25 A Patio 1 and patio 2?

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1 Q Right. How private are those? I mean, is  
2 everybody just allowed to walk back there? Is anybody just  
3 allowed access to that area?

4 A No. I think -- I'm not sure whether there's an  
5 agent posted back there or not. And in terms of the patio, I  
6 think they're not particularly well used or well trafficked  
7 Patio 1 is the -- there's the swimming pool which is behind  
8 some shrubs and patio 1 is the easiest point of egress to go  
9 to the swimming pool.

10 For example, after the President hurt his leg and  
11 stopped running, he used to swim, he'd swim in that pool.  
12 If I needed to go see him, I'd go out through the dining  
13 room, through the patio, to go out to the pool. But other  
14 than that, I don't think it's particularly well used, much  
15 used.

16 Q Based on your knowledge, would you call that a  
17 restricted area, patio 1?

18 A Well, I don't think -- you know, people don't go  
19 out and have lunch out there.

20 Q Okay. All right. The Orkin man isn't there  
21 spraying on a regular basis?

22 A Actually, wrong question because there's just a  
23 little -- my office has a window that's on the -- there's  
24 flowers back there and in fact -- there's not a patio out  
25 there, it's just like a foot and there's some flowers behind

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1 it, and the Park Service people are the people who one would  
2 most routinely see back there taking care of the grounds.

3 And also cm patio 1 and on patio 2. And they have pretty  
4 free access back there because sometimes we'll go out --  
5 patio 2 is the Chief of Staff's patio, which Donald Regan  
6 built and if we're out there, sometime-s we'll have a meeting  
7 out there if it's a nice day or something, and in fact  
8 there's fairly often foot traffic back in this area

9 Q In the patio 2 area?

0 A And the patio 1 area. I think there's an air  
1 conditioning thing or something, I'm not sure what it is.

2 Q Okay. Between the two of them?

3 A Between the two of them.

4 Q All right.

5 A By Park Service personnel during the day.

6 Q Okay. Tending the flowers and things like that?

7 A Yes. Tending the shrubs and flowers and things.

8 Q Okay. Are you --

9 A So in that sense, I don't think it's restricted.

0 MR. WISENBERG: Okay.

1 A question here?

2 A JUROR: Are the windows in the White House  
3 treated in any way so that you can easily see out but not  
4 have someone see in?

5 THE WITNESS: No.

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1 A JUROR: So someone standing outside, say, the  
2 dining room complex or the study complex could easily see in?

3 THE WITNESS: Yes.

4 MR. WISENBERG: Are you --

5 Oh, I'm sorry, did you have something else?

6 A JUROR: There is another question.

7 MR. WISENBERG: Sure. I'm sorry.

8 A JUROR: Does the President usually take naps in  
9 the study room?

0 THE WITNESS: No. I don't think so. He may on  
1 occasion, but I don't think so. If he's taking a nap, which  
2 he does, he usually goes back to the residence.

3 A JUROR: He goes back --

4 THE WITNESS: To the residence. Yes.

5 BY MR. WISENBERG:

6 Q Is there a period of down time during the day where  
7 he -- like he gets an hour or so just to be on his own?

8 A Generally, we have what's called phone and office  
9 time which we try to preserve three or four hours.

0 Q Oh, okay.

1 A And that's time when he works in the Oval, makes  
2 phone calls, plays golf if he can get away. Goes back to the  
3 residence. Again, especially after he hurt his leg, he did a  
4 fair amount of physical therapy during that time period.

5 Q Any set time of the day --

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1 A And that would be back in the residence.

2 Q And this question is from ~~the~~ time you've come back  
3 to the White House in '97, any set time of the day that he  
4 would typically be in the study?

5 A No. Not set. No.

6 Q But he would be in there sometimes?

7 A Yes. I would say -- sometimes. He more often uses  
8 the Oval.

9 Q Are you aware of what these -- are you personally  
0 aware of what these -- I'll call them Orkin people, Chem  
1 people, Park Service people --

2 A They're Park Service employees.

3 Q Are you aware of what these Park Service people, of  
4 where they're stationed in terms of like Secret Service  
5 policy, where they go, where they're allowed to go, depending  
6 on what rooms the President is in?

7 A I don't know.

8 Q You said that you believed the President when he  
9 made his denials to you

0 A Yes.

1 Q That was important to you, that denial?

2 A Yes.

3 Q I take it you would be -- would it be fair to say  
4 you would be concerned, upset, betrayed, if you found out  
5 that the denials were wrong, were false?

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1 A I believe him.

2 Q Okay And if you found out that he had been  
3 telling you the truth, would that affect you in any way?

4 A You know, I'm sure it would, but --

5 Q In other words, it was not pro forma to you your  
6 view of the denial. It was important to you that he denied  
7 this.

8 A Yes. And it was not pro forma.

9 MR. WISENBERG: I'm going to ask you to step  
0 outside briefly. We might not even ask you back in.

1 THE WITNESS: Okay.

2 MR. WISENBERG: If we do, it will be very briefly.

3 THE WITNESS: Okay.

4 MR. WISENBERG: I'm sorry, I didn't see your hand  
5 up.

6 A JUROR: Yes. I'm sorry. Just to follow up on  
7 that question,

8 In any of the four conversations that you had with  
9 the President in which he made these denials, could you ever  
0 suggest that Ms. Lewinsky might have come on to him or tried  
1 to initiate some kind of contact or relationship? Anything  
2 like that?

3 THE WITNESS: I mentioned in the conversation on  
4 Friday morning he said that he wasn't sure how he could ever  
5 show that what he was saying was true and I think beyond

1 that, he never really has -- I think he never -- he and I  
2 have never had that conversation, but I think he had been  
3 advised not to have the conversation by his lawyers and I was  
4 sensitive about not exchanging information because I knew I  
5 was a potential witness. So I think we have not communicated  
6 about the facts of this consciously.

7 BY MR. WISENBERG:

8 Q But as I understand your testimony, in this  
9 conversation on the morning of the 23rd, he volunteered this  
0 information to you. Is that correct?

1 A He did.

2 Q As well as the information later that afternoon.  
3 Is that correct?

4 A That's light.

5 MR. WISENBERG: Okay. I'll ask you to step outside  
6 for just a moment.

7 (Witness excused. Witness recalled.)

8 MR. WISENBERG: Let the record reflect the witness  
9 has reentered the grand jury room.

0 Madam Foreperson, do we have a quorum?

1 THE FOREPERSON: Yes, we do.

2 MR. WISENBERG: Are there any unauthorized persons  
3 present in the grand jury room?

4 THE FOREPERSON: There are no unauthorized persons  
5 in the grand jury room.

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1 MR. WISENBERG: Thank you.

2 THE FOREPERSON: Mr. Podesta, you are still under  
3 oath.

4 THE WITNESS: Correct.

5 BY MR. WISENBERG:

6 Q Okay. You want to speak to us on the question  
7 about the information sharing?

8 A Right. I've been just advised by my counsel that  
9 the answer to that question is itself privileged.

0 Q Okay. We won't revisit that right now.

1 A Okay.

2 Q Now, I had another question. You had mentioned  
3 last time when you were talking about --

4 A I could do a casebook on the privilege issues.

5 Q You say you do? You have one?

6 A I said I probably could start one.

7 Q You mentioned last time when you were talking about  
8 the conversation on the morning of the 23rd that the  
9 President had denied -- you mentioned to this effect, and you  
0 correct me if I've got it wrong, the President denied having  
1 sex in any way, shape or form with Ms. Lewinsky, including  
2 oral sex, but he said something to the effect of "I don't  
3 know how I could prove that." Other than --

4 A Or show that. I don't know if he said prove.

5 Q Or show that.

Page 8'

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1 A Right.

2 Q I guess other than the general problem that anyone  
3 has with proving a negative, have you wondered about what he  
4 meant by that?

5 A I think that -- I'd just be speculating about this,  
6 but I think that it was an issue of proving a negative in  
7 context in which Ms. Lewinsky was being pressed, my term, to  
8 give testimony, threatened with indictment, and if she said  
9 that she did, it would be hard to prove that she didn't.

10 You know, that there was sort of a -- I think we  
11 operate, this is my opinion, not his opinion, I think we  
12 operate under a presumption of guilt, that unless you can  
13 prove you absolutely didn't do it, everybody sort of assumes  
14 you're guilty. And I think he was just kind of reflecting on  
15 that.

16 Q You were mentioning Mr. Blumenthal's latest theory.  
17 Tell us, if you can -- well, I don't know how long it would  
18 take to go through it --

19 A Well, I'll do the quick version.

20 Q Okay.

21 A He's noticed that Air Force 1 and Air Force 2 have  
22 gone off, I think this has actually already been reported,  
23 that they've gone off the radar screen coming into LaGuardia  
24 recently and that that usually precedes a claim that there's  
25 been an alien abduction and that we have a new theory or a

1 THE WITNESS: Thank you.

2 THE FOREPERSON: Thank you.

3 (The witness was excused.)

4 (Whereupon, at 1:00 p.m., the taking of testimony  
5 in the presence of a full quorum of the Grand Jury was  
6 concluded.)

7 \* \* \* \* \*

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1 new defense that this whole matter is somehow linked to alien  
2 abductions, but I think that's probably the result of "The  
3 X-Files" being previewed this week. But with Sidney you're  
4 never quite sure whether he believes or he's just kidding.  
5 I think he was just kidding.

6 Q This is one reason why I can't ask you when you  
7 come back in are you the same as Podesta.

8 A That's what I thought you were getting at.

9 (Laughter.)

10 MR. WISENBERG: All right. But, of course, if  
11 somebody had taken over your body they probably wouldn't  
12 admit that anyway.

13 THE WITNESS: When Agents Siskind and Mulder are out  
14 in those green chairs, I'll really start to worry.

15 MR. WISENBERG: Okay. I understand you're going to  
16 China tomorrow.

17 Are there any other questions?

18 (No response.)

19 MR. WISENBERG: If there are, may the witness  
20 be excused?

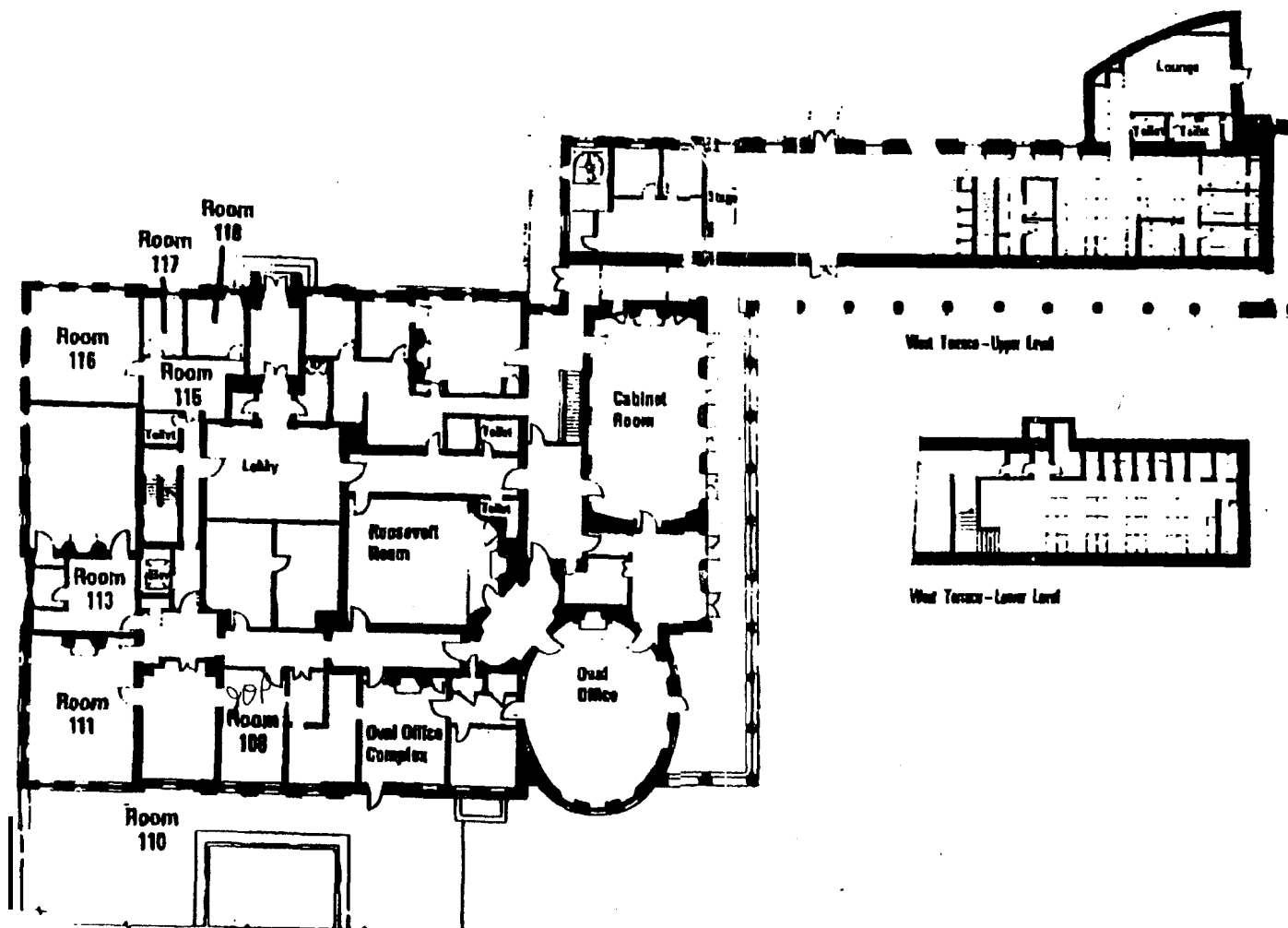
21 THE FOREPERSON: Yes, he may thank you very much.

22 MR. WISENBERG: Hopefully, bringing new evidence,  
23 hopefully we'll not need to see you again.

24 THE WITNESS: Okay. Thank you.

25 MR. WISENBERG: Thank you

# First Floor





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1002



points to make in affidavit

Your **first** few paragraphs should be about yourself -- what you do now, what you did at the White House and for how many years you were there as a career person and as a political appointee.

you and Kathleen were friends. **At around the time of her husband's death** (the President has claimed it was after her husband died. Do you really want to contradict him?), she came to you after she allegedly came out of the oval and looked (however she looked), you don't recall her exact words, but she claimed at the time (whatever she claimed) and was very happy.

You did not see her go in or see her come out.

Talk about when you became out of touch with her and maybe why.

The next you heard of her was when a Newsweek reporter (I wouldn't name him specifically) showed up in your office saying she was **naming** you as a someone who would corroborate that she was sexually harassed. You spoke with her that evening, etc. and she relayed to you a sequence of events that was very dissimilar from what you remembered happening. As a result of your conversation with her **and subsequent** reports that showed she had tried to enlist the help of someone else in her lie that the President sexually harassed her, 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.



You are not sure you've been clear about whose side you're on. (Kirby has been saying you should look neutral; better for credibility but you aren't neutral. Neutral makes you look like you're on **the** other team since you are a political appointee)

It's important to you that they think you're a team player, after all, you are a political appointee. You believe that they think you're on the other side because you wouldn't meet with them.

You want to meet with Bennett. You are upset about the comment he made, but you'll take the high road and do what's in your best interest.

December **18th**, you were in a better position to attend an **all** day or half-day deposition, but now you are into JCOC mode. Your livelihood is dependent on the success of this program. Therefore, you want to provide an affidavit laying out all of the facts in lieu of a deposition.

You want Bennett's people to see your affidavit before it's signed.

Your deposition should include enough information to satisfy their questioning.

By the way, remember how I said there was someone else that I knew about. Well, she turned out to be this huge liar. I found out she left the WH because she was **stalking** the P or something like that. Well, at least that gets me out of another scandal I know about.

**The** first few paragraphs should be about me- what I do **now**, what **I** did at the White House and for how many years I was there as a career person and as a political appointee.

Kathleen and I were friends. **At** around the time of her husband's death, she came to me after she allegedly came out of the oval and looked \_\_\_\_\_, I don't recall her exact words, but she claimed at the time \_\_\_\_\_ and was very happy.

I did not see her go in or see her come out.

Talk about when I became out of touch with her and maybe why.

The next time I heard of her was when a Newsweek reporter showed up in my office saying she was naming me as someone who would corroborate that she was sexually harassed by the President. I spoke with her that evening, etc. and she relayed to me a sequence of events that was very dissimilar from what I remembered happening. **As** a result of my conversation with her and subsequent reports that showed she had tried to enlist the help of someone else in her lie that the President sexually harassed her, I now do not believe that what she claimed happened really happened. I now find it completely plausible that she herself smeared her lipstick, **untucked** her blouse, etc.

I never saw her go into the oval office, or come out of the oval office.

I have never observed the President behave inappropriately with **anybody**.



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- X  
IN RE:

GRAND JURY PROCEEDINGS  
----- X

Grand Jury Room No. 3  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001

Thursday, August 13, 1998

The testimony of STACY DESMOND PORTER was taken in  
the presence of a full quorum of Grand Jury 97-2, impaneled  
on September 19, 1997, commencing at 10:50a.m., before:

EDWARD J. PAGE  
MARY ANNE WIRTH  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

Page 3

- 1 MS. WIRTH: Yes.
- 2 THE FOREPERSON: Officer Porter, it's going to be
- 3 important that you say yes or no rather than mm-hmm or un-uh
- 4 because it can't be recorded. We need like a yes or a no or
- 5 an audible response.
- 6 THE WITNESS: Okay.
- 7 THE FOREPERSON: Thank you.
- 8 THE WITNESS: You're welcome.
- 9 MR. PAGE: Thank you, Madam Foreperson.
- 10 Do we still have a quorum?
- 11 THE FOREPERSON: Yes, we do.
- 12 MR. PAGE: And there are no unauthorized persons
- 13 present, correct?
- 14 THE FOREPERSON: No.
- 15 BY MR. PAGE:
- 16 Q All right. Officer Porter, before the
- 17 interruption, I was explaining to you who we were and that
- 18 this was a federal grand jury and I represent to you that
- 19 this federal grand jury is investigating certain matters
- 20 related to Monica S. Lewinsky and whether she was intimidated
- 21 or influenced or obstructed justice as well as related
- 22 crimes, along with, perhaps, others. Do you understand?
- 23 A Yes.
- 24 Q The court reporter is sitting near you immediately
- 25 to your left and she is taking down everything that is said

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1 PROCEEDINGS

- 2 Whereupon,
- 3 STACY DESMOND PORTER
- 4 was called as a witness and, after having been first duly
- 5 sworn by the Foreperson of the Grand Jury, was examined and
- 6 testified as follows:

7 EXAMINATION

8 BY MR. PAGE:

- 9 Q Would you tell us your full name, please?
- 10 A My full name is Stacy Desmond Porter.
- 11 Q And is it Officer Porter with the United States
- 12 Secret Service?
- 13 A Yes.
- 14 Q My name is Ed Page and to my left is Mary Anne
- 15 Wirth. We work for the Office of Independent Counsel.
- 16 Mary Anne Wirth will be asking you the questions today
- 17 primarily, but before we do that, we wanted to explain
- 18 some things to you, okay?
- 19 A Mm-hmm.
- 20 Q First of all, you are before the federal grand
- 21 jury --
- 22 THE FOREPERSON: Somebody's knocking.
- 23 MR. PAGE: Excuse me.
- 24 (Interruption to the proceedings.)
- 25 THE FOREPERSON: May I please just make a comment?

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- 1 today, both the questions and answers, and that's why the
- 2 foreperson reminded you to say yes or no when you give your
- 3 answers. Do you understand that?
- 4 A Yes.
- 5 Q Do you understand also that Federal Rule of
- 6 Criminal Procedure No. 6(e) controls who can have access to
- 7 the information that's talked about today, both your
- 8 questions and answers? And that rule says that only you
- 9 after you leave here can share what went on in front of the
- 10 grand jury today with others. Do you understand that?
- 11 A Yes.
- 12 Q There are certain exceptions to that, however.
- 13 For example, in the future, if a court should say to the
- 14 Office of Independent Counsel you must disclose this
- 15 information or you should disclose it or a case is brought
- 16 or some other situation, that the information would no
- 17 longer remain secret. Do you understand that?
- 18 A Yes.
- 19 Q But for the time being, the idea that I want to
- 20 convey to you is that we are not free after you walk out of
- 21 here today without a court order to disclose what you said
- 22 here today. Do you understand that?
- 23 A Yes.
- 24 Q All right. I want to go over some of your rights
- 25 and responsibilities. First of all, do you understand that

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Page 5

1 you are under an obligation to tell the truth?  
 2 A Yes.  
 3 Q Do you understand that you may refuse to answer any  
 4 of the questions that are put to you if a truthful answer to  
 5 the question would tend to incriminate you?  
 6 A Yes.  
 7 Q That's commonly called your Fifth Amendment right  
 8 and you understand that?  
 9 A Yes.  
 10 Q Do you understand further that what you do say may  
 11 be used against you by the grand jury or in a subsequent  
 12 legal proceeding?  
 13 A Yes.  
 14 Q Do you understand that if you have a lawyer, the  
 15 grand jury will permit you a reasonable opportunity to step  
 16 outside the grand jury room and to consult with that lawyer  
 17 or lawyers if you want to?  
 18 A Yes.  
 19 Q Do you have a lawyer present?  
 20 A No, I don't.  
 21 Q Are you represented by Mr. Leibig or Matt Dates of  
 22 the United States Secret Service?  
 23 A Matt Dates. Yes.  
 24 Q All right. So actually you don't have a lawyer who  
 25 represents you personally, but there is a lawyer, Matt Dates,

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1 present from the Secret Service.  
 2 A Yes.  
 3 Q Do you understand that you have a right to go  
 4 outside and talk with him should you desire at any time?  
 5 A Yes.  
 6 Q I represent to you now that you are a subject of  
 7 the grand jury's investigation in the broadest sense of that  
 8 word. There are two types of witnesses that come before the  
 9 grand jury. One is a target; that is, a person who the grand  
 10 jury has substantial evidence linking them to the commission  
 11 of a crime and that is someone that they intend or are  
 12 thinking about indicting. I represent to you that you are  
 13 not a target.  
 14 There's a different category, though, and that's  
 15 the subject and at one end of that, subject can be defined  
 16 as someone whose conduct is within the scope of the grand  
 17 jury's investigation and at the far other end is a person  
 18 who is also covered by the definition subject of a grand jury  
 19 investigation but they are merely fact witnesses. For  
 20 example, they saw a bank robbery take place, but didn't  
 21 participate in it themselves. Do you understand that?  
 22 A Yes.  
 23 Q I'm representing to you that you're in that latter  
 24 category, even though some people don't like to be called  
 25 subjects of the grand jury investigation, but I'm saying and

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1 I'm representing to you that you fit in that latter category  
 2 as a fact witness. Do you understand that?  
 3 A Yes.  
 4 Q Do you understand that during your testimony today  
 5 you can't claim not to recollect something if that's not  
 6 accurate? Are you following me? In other words, you can't  
 7 say when Ms. Wirth is asking you your questions "I forget"  
 8 when that's not the truth.  
 9 A I -  
 10 Q All right. Do you have any questions for us before  
 11 we get started?  
 12 A No, I do not.  
 13 MR. PAGE: All right. Thank you very much.  
 14 THE WITNESS: You're welcome.  
 15 BY Ms. WIRTH:  
 16 Q okay. Officer, how long have you been with the  
 17 Secret Service?  
 18 A October 16th of this year will be three years.  
 19 Q Okay. And have you been assigned to the White  
 20 House for a period of time?  
 21 A Yes, I have.  
 22 Q For how long?  
 23 A October 16th will be three years at the White  
 24 House.  
 25 Q And what assignments have you had in the past three

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1 years at the White House?  
 2 A When I first got the job at the White House, I was  
 3 unassigned, which means I was everywhere. Then I got a full  
 4 position -- a permanent position, I'm sorry, which is called  
 5 the northwest gate, which is one of the exterior posts at the  
 6 White House. And I've gone through tour training at the  
 7 White House.  
 8 Q And when were you assigned to the northwest gate?  
 9 A I was assigned to the northwest gate approximately  
 10 one year ago.  
 11 Q Okay. Have you ever seen Monica Lewinsky?  
 12 A Yes, I have.  
 13 Q Can you tell the grand jury when the first time  
 14 was?  
 15 A The first time that I seen Monica Lewinsky was  
 16 during the winter of '98. I believe it was either January or  
 17 February.  
 18 Q That's this past winter?  
 19 A Yes. I'm sorry. This past winter. The beginning  
 20 of 98.  
 21 Q Okay.  
 22 A And that was the first time I seen her.  
 23 Q Okay. And was this -- you're familiar with a story  
 24 that broke about Ms. Lewinsky in the newspaper which we'll  
 25 represent to you occurred on January 21, 1998 when a story

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Page 9

Page 11

1 was published about Ms. Lewinsky and possible involvement  
2 with the President? Are you aware of that?

3 A Ya.

4 Q Are you talking about an incident that happened  
5 before or after that?

6 A No, this was an incident that happened at the  
7 northwest gate when she came up to visit -- I guess -- I  
8 believe it was like January or February the beginning of '98.  
9 It was during the wintertime.

10 Q Okay. Are you certain about the date?

11 A I'm not exactly certain about the date. I just

12 know it's during the

13 Q Okay. And it was before any information about her  
14 became public. Is that right?

15 A Yes.

16 Q Okay. Is that the first time that you had any  
17 contact with her or ever saw her, to your knowledge?

18 A Yes.

19 Q Tell us what happened that day.

20 A Well, that day, she came up to visit. She  
21 supposedly wanted to get cleared under Betty Currie's name to  
22 come into the White House.

23 Q She came to the northwest gate?

24 A Yes. She came up to the northwest gate. At that  
25 time, I was going on break to eat my lunch.

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Page 12

1 Q Do you remember about what time it was?

2 A I believe it was still morning time, between 10 or  
3 11 o'clock in the morning.

4 Q Okay. And you were about to go on break, you said?

5 A Yes. I was about to go on break. And I spoke to  
6 her, asked how she was doing and kept going.

7 Q When you say you asked her how she was doing, you  
8 had never seen her before?

9 A No.

10 Q Why did you speak to her?

11 A I mean, I always speak to people as they come up to  
12 the gate. Right now, we're in a temporary trailer. They're  
13 doing a lot of construction work around the White House, so  
14 any time someone comes up to the northwest gate, you have to  
15 open the door and find out, you know, what they need or why  
16 they're there at the White House and at that time, like I  
17 said, she walked up and I passed her going out and asked her  
18 how she was doing.

19 I was downstairs on break for --

20 Q Let me back up for a minute. Let me interrupt you  
21 just for a second. When she first came to the northwest  
22 gate, did you hear what she said?

23 A No.

24 Q Who did she deal with?

25 A She dealt with Brian Hall, Officer Brian Hall, and

1 Officer Gary Niedzwiecki.

2 Q Okay. So at that point, to your knowledge, you had  
3 no idea why she was there or who she was there to see?

4 A No.

5 Q Okay. So you went on break.

6 A Went on break and I was on break for probably 10 to  
7 15 minutes. Got a call to respond back to the northwest  
8 gate. That's when I responded back to the northwest gate.  
9 And my supervisor at the time, well, still, Keith Williams,  
10 he asked us what happened just now and I had no idea what  
11 just happened because I was on break.

12 Q Okay. All right. So did you ever hear Monica  
13 Lewinsky speak at all that day?

14 A No.

15 Q What did Keith Williams say besides what happened?

16 A Well, he just wanted to know did any of us say  
17 anything to, I guess, upset her or whatever she did, did we  
18 say anything to upset her. And I told him at that time I was  
19 on break, I have no idea what was said.

20 Now, like I mentioned, this was during the  
21 wintertime, it was cold out that day. Normally, we don't  
22 do this, but sometimes we extend our courtesy and have  
23 people standing on the inside and wait, but sometimes you  
24 can't do that because of security reasons, but at that time,  
25 she was by herself, so I guess they let her come in and wait

1 on the inside.

2 Q When you left to go on your break, was she already  
3 inside the trailer?

4 A No, she was still outside. We have a house phone,  
5 which is located on the outside of the trailer, and I guess  
6 she was going up to the house phone to use that as I was  
7 going the other way.

8 Q Did you hear what any of the other officers said to  
9 Sergeant Williams about what happened?

10 A Just when I came back to post and he asked us what  
11 just happened. At the time, Brian Hall said he was just  
12 small talking with her, you know, how's it going or whatever  
13 he was saying to her. Must have upset her and supposedly she  
14 went storming out and I guess she kept calling out to the  
15 West Wing to speak with Betty Currie and that was that.

16 Q Did Sergeant Williams say anything else?

17 A No. I guess he talked to us, still trying to  
18 get to the bottom of it and, at that time, my supervisor  
19 who is also above Keith Williams, which was Captain Purdie,  
20 also came to the trailer and at that time he said,  
21 "Whatever just happened didn't happen. You all understand."  
22 we said, "Yes, sir."

23 And he didn't want us to repeat it or have it --  
24 you know, talking to other officers about what just happened,  
25 so we said understood.

1 Q During any of the conversations that you were in a  
2 position to overhear between Sergeant Williams and either  
3 Gary Niedzwiecki or - I'm drawing a blank - Gary  
4 Niedzwiecki or Brian Hall, did you ever hear Eleanor  
5 Mondale's name mentioned?

6 A Yes.

7 Q What did you hear?

8 A I was on post at the time when she came up. She  
9 was already inside. And I guess during the small talk that  
10 Officer Brian Hall was having with Monica Lewinsky, he must  
11 have mentioned her name.

12 I guess he said Betty Currie's inside talking with  
13 Mondale or either giving her a tour, and I guess that's what  
14 got Monica Lewinsky upset and she kept calling out to the  
15 West Wing, which in turn, I guess, Betty Currie got upset  
16 because she didn't want her calling down there. And that was  
17 that.

18 Q Did you ever hear whether any of the Secret Service  
19 officers who dealt with Monica Lewinsky gave her any  
20 information about the President's location?

21 A No, I didn't.

22 Q During any of the conversations that you overheard,  
23 did you ever hear Sergeant Williams or Captain Purdie refer  
24 to the fact that they had spoken to the President?

25 A Yes, I did.

1 Q What did you hear?

2 A Well, at that time, Sergeant Keith Williams, he got  
3 called to Betty Currie's office and from what we were told,  
4 they said he was in Betty Currie's office and the President  
5 came and shut the door behind him and wanted to know who at  
6 the time was out at the northwest gate and he was upset, I  
7 guess, because of Brian Hall or Officer Brian Hall was  
8 talking or must have said something about Mondale being  
9 inside.

10 He was upset with that and supposedly Keith  
11 Williams explained to him he was just doing his job, you  
12 know, small talk or whatever, and that was that. And that's  
13 at the time that he came out to us and wanted to find out  
14 what just happened out there. And that's all I remember.

15 Q Now, you said that you had gone on break and about  
16 ten minutes after that you were called back to your post?

17 A It was probably like 10 to 15 minutes later. I  
18 remember going down, grabbing my food, ate a sandwich and at  
19 that time, "Officer Porter, respond back to the northwest  
20 gate ASAP." And that's when I was called back.

21 Q And when you got back to the northwest gate, was  
22 Sergeant Williams there waiting for you or did he arrive  
23 after that? If you remember.

24 A I know where I was on break, I was very close to my  
25 post, so it didn't take any time to get back to post and I'm

1 not sure if he came in first or both Williams and Purdie  
2 walked in together.

3 Q But you remember them both being there at some  
4 point?

5 A Yes.

6 Q You said at one point that Sergeant Williams was  
7 called to see Betty Currie. Is that right?

8 A Yes.

9 Q Did that happen while you were there?

10 A While I was -

11 Q Was Sergeant Williams called away while you were in  
12 the trailer and he was talking to everyone?

13 A No, I think all this happened at the time before he  
14 came back to post, when I was called to go back to post.  
15 Like I said, I was not too far from my trailer, he was down  
16 in the West Wing, which is a few feet from the trailer - the  
17 temporary trailer, I'm sorry, which is a few feet from the  
18 temporary trailer, which takes me no time to get there and  
19 when I was called back to post, I don't know if he called me  
20 from post or if he called me from the West Wing and asked me  
21 to respond so we can both meet up at the trailer at the same  
22 time.

23 Q Okay. So when you saw Sergeant Williams, it was  
24 your impression that he already had spoken to the President.

25 A Well, when I was told to come back to post ASAP,

1 just something in my mind said what just happened. I was  
2 just assuming that something just happened and I just  
3 couldn't think at that time what happened.

4 And when they told me to come back ASAP, that's  
5 when they came in, what just happened, the President was  
6 upset, whatever was just said out here, I want to know what  
7 just happened. Like I said, I didn't know what just  
8 happened because I was on break.

9 Q Okay. My question was, though, when you first  
10 encountered Sergeant Williams back at your northwest gate  
11 post, from what he said, what Sergeant Williams said, did  
12 you conclude that Sergeant Williams had already spoken to  
13 Betty Currie and the President?

14 A Yes.

15 Q Okay. And Sergeant Williams said things that led  
16 you to believe that he had spoken to the President  
17 personally.

18 A Yes.

19 Q And I think you said that someone shut the door?

20 A Supposedly, what he told us, while he was talking  
21 to Betty Currie in her office, he came in there.

22 Q Let me just interrupt you. Is this Sergeant  
23 Williams speaking to you directly or to the group?

24 A He's speaking to the entire group.

25 Q Okay. And you're hearing this directly from

Page 1'

Page 1'9

1 Sergeant Williams?

2 A Yes.

3 Q Wktdidksay?

4 A That whatever was said at the northwest gate upset  
5 Betty Currie. He got called to her office to talk to her and  
6 supposedly the President came into the office upset about  
7 what was said at the northwest gate.

8 Q And did he say whether anyone shut the door? I  
9 thought you mentioned a minute ago that the door was shut.

10 A Yes. The President supposedly came into the office  
11 and shut the door while he was in the office.

12 Q And did Sergeant Williams say what the President  
13 had said?

14 A Just that he wanted to know what was said at the  
15 northwest gate or what officer said something at the  
16 northwest gate. Like I said, I have no idea what was said  
17 because I wasn't there, you know, whenever they were talking  
18 to Monica.

19 And he just wanted to know who was out at the  
20 northwest gate at that time because supposedly Officer Brian  
21 Hall, I believe he was doing most of the talking with Monica,  
22 he must have said something that upset the President and in  
23 turn he wanted to know who was posted at the northwest gate  
24 at that time.

25 Q Did Sergeant Williams convey what tk President's

1 he in turn called his supervisor, which was Captain Purdie,  
2 to bring him down to Betty Currie's office to let him know  
3 what just happened.

4 Q To your knowledge, based on anything that you heard  
5 or know yourself, do you know whether the President ever  
6 spoke to Captain Purdie that day?

7 A No, not to my knowledge.

8 Q And you said earlier that Captain Purdie also  
9 addressed the group?

0 A Yes.

1 Q And he said words to the effect of this didn't  
2 happen?

3 A Yes. He asked us what just happened didn't happen,  
4 meaning if we left post going to another officer or someone  
5 else, you know, he didn't want us to repeat it. So --

6 Q If you what?

7 A He didn't want us repeating it any more.

8 Q I see. He didn't want the story spread around.

9 A No.

0 Q Did he say anything beyond what just happened  
1 didn't happen? Did he explain what he meant by that?

2 A Just to my knowledge from upsetting Betty Currie  
3 and the President, he just didn't want us repeating anything  
4 that just happened and he just said you understand and we  
5 said yes, sir.

Page 18

Page 20

1 demeanor was or manner, how he seemed when Sergeant Williams  
2 spoke to him?

3 A All he said to us was that he was just upset.

4 Q Did Sergeant Williams say anything about anybody  
5 being fired or being disciplined or losing their job or  
6 anything like that over this?

7 A Well, he said that the President wanted that person  
8 gone, whoever said it. And he said he talked to Betty Currie  
9 and explained to her that he was just doing his job and I  
10 guess Betty Currie must have talked to the President or just  
11 either talked with Keith Williams, just those two, and Keith  
12 Williams and Captain Purdie came up and talked to us, said  
13 they talked to Betty Currie, they explained to her that you  
14 were just doing your job and from this point on, whatever  
15 just happened, didn't happen.

16 Q Now, when Sergeant Williams was recounting what  
17 happened when he spoke to the President, was Captain Purdie  
18 present? If you remember.

19 A When he was talking to the entire group?  
20 I'm sorry. Yes, he was. I believe he was present.

21 Q Okay. Did Captain Purdie ever say that he, Captain  
22 Purdie, had spoken personally to the President?

23 A He didn't say that he personally spoke to the  
24 President, but at the time when Keith Williams was called to  
25 Betty Currie's office, he knew that there was a problem, so

1 Q Did anyone say anything about whether anybody would  
2 be disciplined or fired or anything like that?

3 A As far as Keith Williams or the captain?

4 Q Mm-hmm.

5 A No, they didn't say anything, to my knowledge,  
6 about anyone being fired. Just the only thing I remember was  
7 Keith Williams said that the President was upset and he  
8 wanted that person gone, whoever said whatever they said to  
9 Monica.

0 Q Was it ever conveyed to you that the whole thing  
1 had been smoothed over in some way?

2 A Yes.

3 Q Okay. And that was by Sergeant Williams?

4 A Yes.

5 Q And that's when he said that -- you said earlier  
6 you didn't know what had happened, whether Betty Currie had  
7 spoken to somebody. Do you have any idea how it got smoothed  
8 over, based on what you heard?

9 A Just supposedly Keith Williams and Betty Currie  
0 talked, as far as I know. What they said, I don't know, but  
1 I just know they talked to each other.

2 Q Okay. Did you ever hear about the incident again  
3 after that? After that conversation that you were a part of  
4 with Captain Purdie and Sergeant Williams, did the issue ever  
5 come up again after that?

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1 A No. Those two -- those two never came up to me and  
2 asked me any other questions. It was just after everything  
3 was over, just said to us, you know, you have to be careful  
4 what you say to people when they come up here to visit,  
5 just -- you know, if anyone -- I mean, anyone's allowed to  
6 ask you if the President's at home, I mean, we can answer  
7 that, but just being careful what you say while you're  
8 working on an exterior post.

9 MS. WIRTH: okay. Officer, we're going to ask you  
0 to step out for a few minutes.

1 THE WITNESS: Okay.

2 (Witness excused. Witness recalled.)

3 THE FOREPERSON: Officer Porter, I'd like to remind  
4 you that you're still under oath.

5 THE WITNESS: Yes.

6 BY MS. WIRTH:

7 Q Officer, the grand jurors had a few questions for  
8 you. The first one is did you ever have any conversations  
9 with Officer Hall or Officer Niedzwiecki after this incident  
0 that you've described and after, you know, the talk that you  
1 had with Sergeant Williams and Captain Purdie? Did you ever  
2 have any conversations yourself with Hall or Niedzwiecki  
3 about the incident?

4 A Yes. After the fact, we talked.

5 Q Do you remember what you talked about?

Page 22

1 A Just still trying to find out what happened from  
2 Officer Hall. He said he invited her to come in because it  
3 was cold outside and I guess he must have mentioned -- small  
4 talk to her, you know, Betty Currie may not be available,  
5 she's either giving a tour or either talking to Elizabeth  
6 Mondale.

7 Q Eleanor Mondale?

8 A I'm sorry, Eleanor Mondale. And from that time,  
9 I guess that's when she got upset and either -- stormed out,  
0 I believe he said. I'm not sure if she stormed out of the  
1 trailer and went back to a pay phone or something, calling  
2 out to the West Wing.

3 Q Okay. Anything else that you recall about -- did  
4 you talk to Officer Niedzwiecki? Do you remember that at  
5 all?

6 A I know I talked to him, but I don't remember what  
7 he said. It was probably something the same.

8 Q Have you ever had any subsequent conversations with  
9 Captain Purdie about this?

0 A No, just that day when he came up to us and said,  
1 you know, what just happened didn't happen. I mean, as far  
2 as down the road, nothing else was mentioned between the two  
3 of us.

4 Q What about Sergeant Williams? Have you ever had  
5 any subsequent conversations with him about this?

Page 23

1 A Same thing, down the road. That same day, he just  
2 said to us, you know, hey, you all, you have to be careful  
3 about what you say to people when they come up to visit.

4 Q Did you ever talk to Sergeant Williams again after  
5 that about this incident?

6 A Well, he's my supervisor, but as far as the  
7 incident, no. I mean, just small talk that we have on post  
8 because he's my supervisor, but as far as the incident,  
9 they just asked us --

10 Q A grand juror would like to know whether Sergeant  
11 Williams in talking about what happened when he went up to  
12 the Oval Office and met with Betty Currie and eventually the  
13 President, did Sergeant Williams ever mention that a door to  
14 the Oval Office was cracked open? Did you ever hear anything  
15 like that?

16 A I believe he said something like that. I don't  
17 know if that was the same door that the President must have  
18 walked in and shut or something like that, but at the time  
19 that he told us, he was in there alone with Betty Currie  
20 and that's when the President came in there and shut the  
21 door and must have addressed him as well because he was upset  
22 about what was said at the northwest gate to Monica Lewinsky.

23 Q Do you have an understanding as to whether the door  
24 that the President shut was the door he walked through?

25 A No, I don't have an understanding. I'm not sure if

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1 this was the same door that was supposedly cracked or not. I  
2 mean, I just know he said he came in and shut the door behind  
3 him. I don't know if there was a cracked door or not.

4 Q Okay. Did you ever hear Sergeant Williams mention  
5 a cracked door, to your memory?

6 A Not to my memory.

7 Q Okay. Do you have any knowledge as to whether  
8 Monica Lewinsky actually did get into the West Wing that day?

9 A To my knowledge, I don't think she got in that day.  
10 I mean, as far as I know.

11 Q You never saw her again that day?

12 A No, I never saw her again that day.

13 MS. WIRTH: Anybody else?

14 (No response.)

15 MS. WIRTH: Okay. With your permission --

16 THE FOREPERSON: You are excused. Thank you very  
17 much.

18 MS. WIRTH: Thank you, Officer.

19 THE WITNESS: All right. Thank you.

20 MS. WIRTH: Thank you.

21 (The witness was excused.)

22 (Whereupon, at 11:19 a.m., the taking of testimony  
23 in the presence of a full quorum of the Grand Jury was  
24 concluded.)

25 \*\*\*\*\*

## OFFICE OF THE INDEPENDENT COUNSEL

05/26/98

Date of transcription

JEFFREY J. PURDIE, Captain, United States Secret Service (USSS), Uniformed Division (UD), date of birth June 19, 1960, was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, NW, Washington, D.C. 20004. Present for the interview were Associate Independent Counsel (AIC) MICHAEL TRAVERS and AIC MARY ANNE WIRTH and Department of Justice (DOJ) attorneys DAVID ANDERSON and ANNE WEISMAN. PURDIE was interviewed under the terms of an agreement reached between the OIC and the DOJ. After being apprised of the identity of the interviewers, PURDIE provided the following:

PURDIE has been employed by the USSS since January of 1982, when he entered service in the UD. In June of 1986, having been promoted to Sergeant, PURDIE began working at the White House complex. In September of 1989, PURDIE was promoted to Lieutenant, and in January of 1997 he was promoted to Captain. PURDIE became one of eight USSS captains who are Watch Commanders at the White House. From January of 1998 until present, PURDIE has served as the Branch Administrative Captain of the White House.

PURDIE recalled an incident that occurred on a Saturday in December of 1997. PURDIE could not recall the exact date. Sometime between 11:00 a.m. and noon, PURDIE received a telephone call from Sergeant KEITH WILLIAMS. WILLIAMS asked PURDIE to respond to the Northwest gate of the White House to address a problem that had arisen. PURDIE responded and met WILLIAMS on West Executive Avenue. WILLIAMS told PURDIE that MONICA LEWINSKY had come to the Northwest gate to make an appointment with BETTY CURRIE. LEWINSKY had packages with her, but had not been cleared in through WAVES. (PURDIE knew LEWINSKY by sight and to say hello, as they both had worked in the East Wing of the White House for a period of time.) WILLIAMS advised PURDIE that the gate officers had told LEWINSKY to use the house telephone to call CURRIE and make the appointment. LEWINSKY did this, and came back in the gate house and told Officer BRYAN HALL that no one was in. LEWINSKY then left the gate house. WILLIAMS told PURDIE that WILLIAMS had received a telephone call from West Wing Lobby Officer BRENT CHINERY. CHINERY told WILLIAMS that

05/21/98

WASHINGTON, D.C.

29D-OIC-LR-35063

Investigation on

at

File #

SA

05/26/98

by

Date dictated

29D-OIC-LR-35063

JEFFREY J. PURDIE

05/21/98

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CURRIE had spoken with him. CURRIE was upset that the gate officer had told LEWINSKY the location of the President in the White House, and who the President was with.

WILLIAMS told PURDIE that he had gone to speak with CURRIE, and that CURRIE was upset. CURRIE told WILLIAMS that LEWINSKY had left the White House complex, and that she had called CURRIE several times to make an appointment. CURRIE was concerned that one of the Northwest gate officers had told LEWINSKY the President's position in the White House, and who the President was with.

PURDIE went into the Northwest gate house to speak with the officers posted there. PURDIE recalls telling the officers not to worry, that they would take care of the problem. PURDIE and WILLIAMS then went to the West Wing of the White House to speak with CURRIE. When they arrived, CURRIE was with White House photographer BOB MCNEILLY. MCNEILLY left the office. CURRIE got up, closed the office door behind PURDIE and WILLIAMS, and asked them to sit down. CURRIE was clearly upset. CURRIE told them that LEWINSKY had called from a pay phone to make an appointment to get into the White House. CURRIE told them that the gate officer had told LEWINSKY that the President was with ELEANOR MONDALE in the Oval Office. PURDIE advised that someone suggested that LEWINSKY may have seen MONDALE enter the White House, had come to her own conclusion, and then told CURRIE that the gate officer had disclosed that information. PURDIE could not recall who brought up this scenario. According to PURDIE, this explanation placated CURRIE. CURRIE told PURDIE and WILLIAMS to talk to the officers and find out what happened. CURRIE also told them to keep this incident quiet. PURDIE apologized to CURRIE.

PURDIE then went to speak with the officers at the Northwest gate. PURDIE spoke with Officer HALL, Officer GARY NIEDZIEWSKI, and perhaps one other officer. PURDIE told the officers that everything was all right, and no one would be disciplined. PURDIE stated that either on this occasion, or on the first visit-with the gate officers, PURDIE asked HALL what he said to LEWINSKY. PURDIE is not sure what HALL told him.

PURDIE met with CURRIE in her office a second time, and told her that he had spoken to the officers. PURDIE told CURRIE that if they gave out any information it would not happen again. PURDIE asked CURRIE if she wanted him to do anything else. CURRIE replied no, but that she wanted to keep things quiet. PURDIE

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JEFFREY J. PURDIE

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Continuation of OK-302 of \_\_\_\_\_ . On \_\_\_\_\_ . Page \_\_\_\_\_

agreed and left the office.

PURDIE spoke with CHINERY in the West Wing lobby and asked him to keep the incident quiet.

PURDIE advised that he spoke to WILLIAMS again that day. WILLIAMS approached PURDIE and asked PURDIE if he had spoken with the President. PURDIE refused to answer any other questions regarding this, invoking the Protective Function Privilege.

PURDIE stated that on the same day he telephoned White House Operations Deputy Chief CHARLES O'MALLEY, to explain what had happened. PURDIE told O'MALLEY that CURRIE was satisfied and that there should not be a complaint. O'MALLEY thanked PURDIE for the call.

PURDIE advised that about 45 minutes later he received a telephone call from the Presidential Protection Detail (PPD) operations desk. The PPD agent asked if PURDIE had a problem with BETTY CURRIE. PURDIE replied that he did not. The PPD officer then asked PURDIE if a PPD agent had been involved, to which PURDIE responded in the negative.

A few days later PURDIE spoke with Deputy Chief O'MALLEY. PURDIE asked O'MALLEY if he should follow up the incident with a formal report. O'MALLEY said that that was not necessary, as he had not heard anything further,

PURDIE recalled, at some point, he spoke with FREMON MYLES about LEWINSKY. MYLES stated that he was pleased that LEWINSKY was gone from the White House.. PURDIE advised that he did not know why MYLES was pleased, or how he responded to MYLES' statement.



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- x  
: IN RE: :  
: GRAND JURY PROCEEDINGS :  
: ----- x

Grand Jury Room No. 2  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001

Friday, July 17, 1998

The testimony of JEFFREY JAMES PURDIE was taken in  
the presence of a full quorum of Grand Jury 97-4, impaneled  
on December 5, 1997. Commencing at 4:27 p.m., before:

ROBERT J. BITTMAN  
SOLOMON WISENBERG  
JACKIE M. BENNETT, JR.  
Deputy Associate Independent Counsel  
TIMOTHY SUSANIN  
MARY ANNE WIRTH  
EDWARD J. PAGE  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

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1 conversations were?

2 A Give specifics or how do you want me to lead into  
3 this or --

4 Q If you recollect at this time the substance of the  
5 conversation that you had with the President. we'd like to  
6 start with that.

7 A I can start with that. At the time I was in Betty  
8 Currie's office. I was engaged in a conversation with Betty  
9 Currie in reference to an incident that occurred at the  
10 northwest gate.

11 Some time during that incident the door to the Oval  
12 Office opened up. The President walked into Mrs. Currie's  
13 office or -- let me retract. He kind of stood in the doorway  
14 there. Mrs. Currie introduced me as Captain Purdie,  
15 something in reference to being in charge of the White House  
16 at that time.

17 The President acknowledged me and Mrs. Currie made  
18 a statement something to the effect that the situation had  
19 been handled and he said, "Thank you. I hope I can count on  
20 your discretion."

21 Q Hesaidtbattoyou? "I hope I can count on your  
22 discretion"?

23 A Something to that effect, but the word discretion  
24 was used.

25 Q That was the message that the President sent to

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PROCEEDINGS

1 Whereupon,

2 JEFFREY JAMES PURDIE  
3 was called as a witness and, after having been first duly  
4 sworn by tk Foreperson of the Grand Jury, was examined and  
5 testified as follows:

EXAMINATION

7 BY MR. PAGE:

8 Q Tell us your full name, please?

9 A Jeffrey James Purdie.

10 Q Where do you work?

11 A United States Secret Service uniformed division at  
12 the White House.

13 Q I want to talk with you about Saturday, December  
14 6th.

15 A Yes, sir.

16 Q All right? 1997. Do you recall that day?

17 A Yes, sir.

18 Q There was an incident outside the White House that  
19 day, correct?

20 A Yes, sir.

21 Q As a result of that incident, you had conversations  
22 with the President. correct?

23 A Yes, sir.

24 Q Would you tell the grand jury what those

Page 4

1 you?

2 A Yes, sir.

3 Q Was he looking at you at the time?

4 A I couldn't say 100 percent looking at me. He was  
5 either looking at me or in my direction, something.

6 Q Did Mrs. Currie hear that, to your knowledge?

7 A To my understanding, I don't know how she couldn't  
8 have heard it.

9 Q And how near were you to the President when k said  
10 that?

11 A Ten to fifteen feet.

12 Q Anybody else present when he said that?

13 A No, sir.

14 Q Any other conversation with the President at that  
15 time?

16 A No, sir.

17 Q Tell us how and describe for the members of the  
18 grand jury the President's manner or how k was acting at the  
19 time.

20 A I'm not sure if I really understand that. If  
21 you're asking me if there was anything unusual, the way his  
22 mannerisms were, I would say no.

23 Q Well, when k came out, did he open the door in a  
24 hurry or in an angry fashion?

25 A No, sir. It seemed like the door was opened in a

Page 5

1 normal manner.

2 Q What about the tone of his voice?

3 A Business tone, normal speaking tone.

4 Q Did you reply back anything in response to "I hope  
5 I can count on your discretion"?

6 A It was something to that effect **that he** said to me,  
7 but the word discretion was used. I believe **I** said something  
8 to the effect of "Yes, sir." I mean, I'm sure I said "Yes,"  
9 or **something**, "Yes, sir," to that effect.

0 Q And did he **acknowledge** when you said "Yes, sir"?

1 A I don't believe there was a verbal acknowledgment.

2 Q **Was he** still looking at you?

3 A I believe so. Yes.

4 Q Any other conversation?

5 A No, sir.

6 Q **Betty Currie is there the entire time as this  
7 exchange occurred?**

8 A **Yes, sir.** At the time prior to this **occurrence**,  
9 **she** was sitting at her desk I was sitting on **the** opposite  
0 side of her desk. And as the door opened up, I of course  
1 **realized** who it was, I stood up.

2 Q How did you understand this request by **the**  
3 President to exercise discretion?

4 A It was my understanding at the time **that** the  
5 situation had been handled, meaning there was -- I'm sure

Page 6

1 you're aware **that there** was an incident at **the** northwest gate  
2 **and that I had taken -- what I'm trying to say is the**  
3 situation was taken **care** of.

4 Q But how did you understand **that request** to exercise  
5 discretion, that you should say nothing, that you **should** say  
6 a little, that you should say a lot or **what?**

7 A **At that time, it was my understanding that I wasn't**  
8 going to say **anything**.

9 Q **That's how you took it that day, at that time.**

0 A **Yes, sir.**

1 BY MR. BITTMAN:

2 Q **That's why you responded \*Yes\* to the President's**  
3 question? **Is that correct?**

4 A **Yes, sir.**

5 MR. BITTMAN: That's all we **have** for you **right** now  
6 Captain. **The grand jury has finished their business for**  
7 **today.** We will recall you next **week.** **Thank** you.

8 MR. WISENBERG: **Thank** you

9 May the witness be excused?

0 THE FOREPERSON: Yes. **Thank** you.

1 **(The witness was excused.)**

2 (Whereupon, at 4:38 pm., the taking of testimony  
3 in the presence of a full quorum of the **Grand Jury** was  
4 concluded.)

5

\* \* \* \* \*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 3  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001

Thursday, July 23, 1998

The testimony of JEFFREY JAMES PURDIE was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 3:00 p.m., before:

SOLOMON WISENBERG  
Deputy Independent Counsel  
MARY ANNE WIRTH  
EDWARD J. PAGE  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

## PROCEEDINGS

1 Whereupon,

2 JEFFREY JAMES PURDIE

3 was called as a witness and, after having been first duly  
4 sworn by the Foreperson of the Grand Jury, was examined and  
5 testified as follows:

## EXAMINATION

6 MR. WISENBERG: Madam Foreperson, we have a quorum?

7 THE FOREPERSON: Yes, we do.

8 MR. WISENBERG: Are there any unauthorized persons  
9 in the grand jury room?

10 THE FOREPERSON: There are none.

11 MR. WISENBERG: Thank you.

12 BY MR. WISENBERG:

13 Q Could you state your name for the record, please?

14 A Jeffrey James Purdie.

15 Q And how do you spell Purdie?

16 A P-u-r-d-i-e.

17 Q And can you give us your title, please?

18 A I'm a captain in the United States Secret Service  
19 uniformed division assigned to the White House branch.

20 Q All right. And so it would be appropriate to refer  
21 to you, for us to refer to you as Captain Purdie, correct?

22 A Yes, sir. If that's what you want.

23 Q Okay. Let me just before we start say that my name

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WITNESS:

Page

Jeffrey James Purdie

3

GRAND JURY EXHIBITS:

No. JJP-1 Diagram of West Wing

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1 is Sol Wisenberg and I'm attorney with the Office of  
2 Independent Counsel. To my left is Mary Anne Wirth and she  
3 is also an attorney for the Office of Independent Counsel.  
4 This is the grand jury court reporter, these are the ladies  
5 and gentlemen of the grand jury.

6 This grand jury is a federal grand jury that was  
7 impaneled by a United States district court judge here in  
8 the District of Columbia investigating, among other things,  
9 whether certain persons committed federal felonies in  
10 connection with a lawsuit known as Jones v. Clinton. Do  
11 you understand?

12 A Yes, sir.

13 Q All right. Now, before we get started, I want to  
14 briefly go over your rights and responsibilities as a grand  
15 jury witness. First of all, you don't have a right to have  
16 an attorney in the courtroom, in the grand jury room, with  
17 you, but you can have that attorney outside for consultation.

18 A Yes, sir.

19 Q Do you understand that?

20 A Yes, sir.

21 Q And do you have such an attorney?

22 A No, sir.

23 Q Okay. You're here without an attorney today?

24 A Yes. Well, I do have representation by the Secret  
25 Service.

Page 5

1 Q Okay. But no personal representation.  
 2 A No, sir.  
 3 Q Okay. Well, if you feel a need to talk to the  
 4 Secret Service attorney, just let us know. Do you  
 5 understand?  
 6 A Yes, sir.  
 7 Q And then you have certain privileges. If I ask you  
 8 a question that in order to answer it you have to talk about,  
 9 for instance, a conversation you had with your wife, you  
 10 wouldn't have to answer that because that's recognized by the  
 11 courts, that's the marital privilege. Do you understand  
 12 that?  
 13 A Yes, sir.  
 14 Q If I asked you for a conversation you had with your  
 15 attorney, you could, if you wanted, decline to answer because  
 16 that's attorney-client privilege. Do you understand that?  
 17 A Yes, sir.  
 18 Q If I ask you a question the truthful answer to  
 19 which would tend to incriminate you, you wouldn't have to  
 20 answer. Do you understand that?  
 21 A That would be my Fifth Amendment, sir?  
 22 Q Very good. And other than that, taking a privilege  
 23 on something, do you understand that you've taken an oath and  
 24 you have to truthfully answer all the questions we put to  
 25 you?

Page 6

1 A Yes, sir.  
 2 MR. WISENBERG: AH right. With that, I will turn  
 3 you over to Ms. Wirth for questioning.  
 4 BY MS. WIRTH:  
 5 Q Captain Purdie, you have been employed by the  
 6 Secret Service since January 1982?  
 7 A Yes, ma'am.  
 8 Q And you're in the uniformed division?  
 9 A Yes, ma'am.  
 10 Q And in June of 1986, you were promoted to sergeant?  
 11 A Yes, ma'am. I believe that's correct.  
 12 Q And you began working in the White House complex at  
 13 that time?  
 14 A As an officer, after I went through basic training,  
 15 was when I first was assigned to the White House and then I  
 16 rotated out to our Foreign Missions Branch. I was promoted  
 17 in 1986, I believe it was 1987 when I went back to the White  
 18 House, in June.  
 19 Q All right. And in 1989, you were promoted to  
 20 lieutenant. Is that correct?  
 21 A Yes, ma'am.  
 22 Q And in 1997, you were promoted to Captain. Is that  
 23 correct?  
 24 A No, ma'am. I believe it was 1995.  
 25 Q Okay. And where do you supervise?

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1 A My current assignment is I'm the administrative  
 2 captain at the White House branch.  
 3 Q Okay. And how long have you held that post?  
 4 A End of January, beginning of February when I  
 5 officially took over this position.  
 6 Q And that's 1998?  
 7 A Yes, ma'am.  
 8 Q In December of 1997, what was your position?  
 9 A I was a watch commander at the White House.  
 10 Q Okay. And what does a watch commander do? What  
 11 does that mean?  
 12 A A watch commander is in charge of the uniformed  
 13 day-to-day operations at the White House.  
 14 Q Okay. Do you recall an incident that occurred  
 15 in early December 1997 at the northwest gate?  
 16 A Uh --  
 17 Q Involving Monica Lewinsky.  
 18 A My understanding was June. I mean -- excuse me.  
 19 December. It wasn't early --  
 20 Q What did I say? I'm sorry.  
 21 A I thought you said early. I may be mistaken.  
 22 I'm nervous.  
 23 Q December. That's all right. I could be, too.  
 24 An incident that happened in December of 1997.  
 25 A Yes, ma'am.

Page 8

1 Q At the northwest gate.  
 2 A Yes, ma'am.  
 3 Q You know what I'm talking about?  
 4 A Yes, ma'am. I do.  
 5 Q And you were on duty that day?  
 6 A Yes, ma'am.  
 7 Q What was your first involvement with the incident?  
 8 How did you first hear about it?  
 9 A I was approached by one of my operational  
 10 lieutenants who came to me and said that Sergeant Keith  
 11 Williams, who was assigned to the northwest gate, needed  
 12 my assistance out at the gate.  
 13 Q So what did you do?  
 14 A I believe, being the weather, I believe I went and  
 15 got my coat and I met -- or started responding towards that  
 16 location. At the northwest gate currently -- or at the time,  
 17 and it still is, is being housed in a trailer because of  
 18 construction.  
 19 Q You say the weather, was it cold or was it wet or  
 20 both?  
 21 A I believe it was cold. I'm not sure if it was wet.  
 22 Q All right. So when you responded to the trailer,  
 23 who did you see there?  
 24 A Out on West Executive Avenue, I met with Sergeant  
 25 Williams, who apparently saw me coming and met me somewhat

1 halfway.

2 Q Did you speak to him?

3 A Yes, ma'am.

4 Q What did he tell you?

5 A He explained about a situation that occurred at  
6 the northwest gate in reference to a person trying to get  
7 into the gate, trying to make an appointment with the  
8 President. It subsequently led up to a phone call and a  
9 conversation.

10 Apparently, one of the officers called Sergeant  
11 Williams after this incident occurred. Sergeant Williams  
12 then went and had a conversation with Ms. Betty Currie.

13 Q Do you know Betty Currie?

14 A Not personally. I know who she is.

15 Q Did you hear what -- did Sergeant Williams tell you  
16 what Betty Currie told him?

17 A Yes, ma'am.

18 Q What did he tell you?

19 A Sergeant Williams told me basically that the person  
20 trying to get into the White House didn't get in, departed  
21 the northwest gate, made several phone calls from a pay phone  
22 to Betty Currie's office, tried to get cleared in to get an  
23 appointment with tk President or Mrs. Currie, which of  
24 course led to Sergeant Williams responding to Mrs. Currie's  
25 Off-lee. sergeant Williams also went on to explain that tk

1 spoken to Officer Hall at that point?

2 A Yes, he did.

3 Q And did he tell you what Officer Hall told him  
4 about the incident?

5 A He briefly explained that Officer Hall had some  
6 conversations with the person trying to get in and he wasn't  
7 at the time -- Officer Hall wasn't sure if he gave out the  
8 President's location or the President's appointments.

9 Q He wasn't sure?

10 A At that time, no.

11 Q Okay. What happened next?

12 A Myself and Sergeant Williams went to the northwest  
13 gate, which again as I said is housed in a trailer. At  
14 the northwest gate I had a brief conversation with Officer  
15 Hall and reassured him that I didn't see this being a major  
16 problem at the time and there were two other officers also  
17 present. I explained to them that, you know, whatever  
18 happened we would get to the bottom of it and we would handle  
19 it.

20 Q And did you speak to Officer Hall about what in  
21 particular happened that day?

22 A I briefly spoke to him. Officer Hall at that time  
23 was not sure if he gave out any information erroneously.

24 Q Was Sergeant Williams present for that  
25 conversation?

1 Resident was upset.

2 Q Did Sergeant Williams tell you how k knew that the  
3 President was upset?

4 A He went on to say that he got that from  
5 Mrs. Currie.

6 Q Okay. So Betty Currie told him that?

7 A Yes, ma'am.

8 Q Did Sergeant Williams tell you wtkr Betty Currie  
9 was upset?

10 A Yes, he did. Mrs. Currie was also upset.

11 Q Okay. Did Sergeant Williams tell you wtkr k  
12 himself had spoken to tk President?

13 A At that time, no.

14 Q AU right. What happened next?

15 A He also explained to me that the officers,  
16 particularly one officer, Officer Brian Hall, was extremely  
17 upset, worried about losing his job.

18 Q Did he tell you why?

19 A Because apparently there was an accusation king  
20 made towards Officer Hall at the time that he had give out  
21 the President's location and who the Resident was in with  
22 an appointment at the time.

23 Q And who was that accusation coming from?

24 A Mrs. Currie.

25 O Now, did Sergeant Williams tell you wtkr k had

1 A Yes, ma'am.

2 Q All right. What happened then?

3 A Sergeant Williams and myself went to Mrs. Currie's  
4 office.

5 Q Okay. And who did you see there?

6 A As we arrived into Mrs. Currie's office, Ralph, a  
7 White House photographer was present, as well as Mrs. Currie  
8 in her office.

9 Q And what happened to Ralph?

10 A I spoke with him momentarily, he soon departed.  
11 Once he departed, Mrs. Currie closed the door and had  
12 Sergeant Williams and myself take a seat.

13 Q The photographer that you spoke to, did he speak to  
14 you about this incident at all?

15 A No.

16 Q He basically congratulated for the promotion?

17 A Yes, ma'am. Because I hadn't seen him in a while.

18 Q All right. After the photographer left, what  
19 happened?

20 A Mrs. Currie sat us down.

21 Q Wastkdoorshut?

22 A Yes, ma'am. The door was shut.

23 Q Did she shut it?

24 A Yes. She shut the door once the photographer left.

25 Sergeant Williams and myself sat down and I'm not sure who

Page 13

1 exactly initiated the conversation, but, of course, the  
2 conversation was in reference to this problem.

3 Q Excuse me. Were you in Betty Currie's office at  
4 that point?

5 A Yes, ma'am.

6 Q And you knew what Betty Currie's office was?  
7 You're familiar with where it was?

8 A Yes, ma'am.

9 Q Okay. And were you able to see the door of the  
0 Oval Office at that point?

1 A What door to the Oval Office?

2 Q Does Mrs. Currie's office, is it anywhere near a  
3 door that leads to the Oval Office?

4 A Yes, ma'am.

5 Q And did you look at that door?

6 A Yes, ma'am.

7 Q Was it open or closed?

8 A The door was closed.

9 Q All right. So you're in Mrs. Currie's office with  
0 Sergeant Williams. what happened?

1 A We briefly went through the synopsis of the events  
2 that happened at the northwest gate. Betty Currie went on to  
3 say how upset she was at what happened and she also stated  
4 that the President was very upset.

5 Q Okay. Did she say why the President was upset?

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1 A Apparently, again, the accusation was made that  
2 Officer Hall, and I don't believe Mrs. Currie ever had the  
3 officer's name, but was upset that one of the officers, of  
4 course, King Officer Hall, gave out the information about  
5 the President's location and who his appointment was with.

6 Q Okay. And did Betty Currie tell you anything that  
7 the President had said about this?

8 A Betty Currie went on to say the President was very  
9 upset about it.

0 Q What was Betty Currie's demeanor at that point?

1 What did she seem like?

2 A Betty Currie, as far as her demeanor, obviously in  
3 my opinion she was upset, but I don't think she was as upset  
4 as Sergeant Williams had originally described her as being.

5 Q Okay. How had he described her as being to begin  
6 with?

7 A Extremely upset.

8 Q All right. Did Betty Currie tell you how she  
9 and/or the President found out about what had been said at  
0 the northwest gate?

1 A Yes, ma'am.

2 Q What did she tell you?

3 A She explained that at this point, I believe she  
4 used Monica Lewinsky's name for the first time, she explained  
5 that Monica Lewinsky apparently tried to get in for an

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1 appointment. Of course, the officers checked through the  
2 computer, I'm sure you're aware that they have a computer  
3 system for checking for appointments. She wasn't cleared in  
4 for an appointment.

5 The officer directed her to the house phone which  
6 is outside the box. She attempted to call Betty Currie's  
7 office at this time on the house phone and apparently  
8 couldn't get through.

9 After a few minutes of conversation with the  
10 officer -- and I'm not completely sure if the conversation  
11 occurred outside the post or inside the post with Officer  
12 Hall -- she departed, went to a phone booth somewhere in the  
13 vicinity of the White House and tried in several different  
14 attempts to get through to Betty Currie.

15 On at least one occasion, she got through to Betty  
16 Currie and she was turned down on an appointment by Betty  
17 Currie.

18 Q And she was what?

19 A She was turned down. Betty Currie did not make an  
20 appointment for her on that day.

21 Q That's what Betty Currie told you?

22 A Yes, ma'am.

23 Q And then what happened?

24 A What led to the phone calls where I ended up going  
25 up to the northwest gate.

Page 16

1 Q Did Betty Currie tell you whether Monica had  
2 complained to her about what she had heard one of your  
3 officers at the northwest gate say?

4 A The subject came around somehow that -- part of the  
5 reason why Betty Currie was upset is that Monica Lewinsky  
6 apparently found out that the President was in with another  
7 appointment,

8 Q Okay. And did Betty Currie tell you how Monica  
9 Lewinsky had found that out?

0 A That's where the allegation came in, that it came  
1 from the officer.

2 Q Okay. Did Betty Currie tell you what Monica  
3 Lewinsky said the officer had said?

4 A Not specifically, other than the fact that the  
5 officer gave out the information to Ms. Lewinsky.

6 Q Did the name of the other appointment come up in  
7 your conversation with Betty Currie?

8 A Yes, it did.

9 Q What was it?

0 A Eleanor Mondale.

1 Q And did Betty Currie tell you that Monica Lewinsky  
2 had found out that the President was with Eleanor Mondale?

3 A Yes, ma'am.

4 Q What did you and/or Sergeant Williams say to Betty  
25 Currie?

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1 A At this point, it somehow got on the subject that  
2 it may not have been the officer, and who exactly brought  
3 this up I'm not 100 percent sure, but given the timeframe and  
4 the close proximity of the appointments between the time  
5 Ms. Mondale showed up and the time Ms. Lewinsky showed up, it  
6 was decided upon it's possible that Ms. Lewinsky could have  
7 observed Ms. Mondale going in.

8 Q You said earlier that when you spoke to Officer  
9 Hall he -- at that time, he was stating that he did  
10 not recall whether he had given the President's location  
11 out. At some point, did he tell you that he had given it  
12 out?

13 A When I questioned him afterwards, because I went  
14 back out to the northwest gate, he said it was possible, but  
15 k wasn't 100 percent sure.

16 Q That was after you spoke to Betty Currie?

17 A Yes, ma'am.

18 Q All right. Well, let's go back to your  
19 conversation, then, with Betty Currie. So basically you  
20 and/or Sergeant Williams explained to her that this  
21 information could have come from -- Monica Lewinsky could  
22 have obtained the information in other ways or in another  
23 way. Did you tell her what that other way was?

24 A Well, I don't know if it was me that actually told  
25 her that. To be honest with you, I don't remember, but I do

Page 18

1 know that the timeframe came up in the close proximity to the  
2 appointments. It was possible. Betty Currie seemed to agree  
3 with that.

4 BY MR. WISENBERG:

5 Q Were you trying to protect Officer Hall?

6 A No, sir.

7 Q I'm not saying there would be anything wrong with  
8 that.

9 A No, I'm just saying -- well, in a situation like  
10 this, it was more of a fact finding. But on the same token,  
11 I certainly wouldn't have given up Officer Hall at that  
12 point.

13 Q Okay. Given him up, in other words --

14 A I wouldn't have made an accusation to a passholder,  
15 saying that, "Yeah, you're right, he did wrong."

16 BY MS. WIRTH:

17 Q And you said Betty Currie seemed to be satisfied  
18 with&at? Or calmed down by then or --

19 A At this point, I made the suggestion that I was  
20 going to go out and talk to the officers just to make sure  
21 that they didn't in fact give out any information and she did  
22 seem satisfied with that.

23 Q Did the subject of anyone being fired ever come up?  
24 Or disciplined?

25 A I believe Mrs. Currie said something the effect

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1 that the President was so upset he wants somebody fired over  
2 this. But I kind of need to add this, that at no point in my  
3 mind was I thinking, "Oh, my God, somebody will be fired over  
4 this."

5 Q Because?

6 A That's not the way things are done, at least in our  
7 organization.

8 Q Meaning that the President wouldn't be the one to  
9 fire somebody? Or that this is out of proportion to the  
10 incident or what?

11 A I think it was kind of out of proportion for the  
12 incident. Especially without doing an investigation or a  
13 fact finding mission.

14 Q Okay. Was there anything else about your  
15 conversation with Betty Currie that you remember?  
16 Was anything mentioned at that point about keeping the  
17 incident quiet or not speaking about it or telling the  
18 officers involved not to speak about it? Anything like  
19 that?

20 A That was part of my conversation with Mrs. Currie.  
21 I explained to her that I would tell the officers that --  
22 you know, to kind of keep it under their hat.

23 Q Did she ask you to do that?

24 A Yes, ma'am.

25 Q What did she say?

Page 20

1 A She asked me to make sure that the officers  
2 didn't give out any information on the President as far  
3 as location and who his appointments were. And I explained  
4 to her that's pretty much our policy.

5 Q Did she have any conversations with you about  
6 whether anyone should speak about the incident that day?

7 A Not specifically, no.

8 Q Was there any discussion whatsoever any time that  
9 day with anyone about whether it would be a good idea that  
10 the people involved not speak about this incident, not  
11 discuss it, not tell the story to others?

12 A I went out to the gate with Sergeant Williams  
13 afterwards and explained to the officers not to talk about  
14 this.

15 Q Why?

16 A Because a lot of the story could have been based on  
17 rumors and I don't think it was fair for anybody to engage in  
18 rumors.

19 Q Did you instruct the officers to do that because of  
20 something that Betty Currie had said?

21 A No, ma'am.

22 Q Did Betty Currie ever state to you that the  
23 incident should not be discussed or it should be kept quiet?

24 A Not in so many words, but she reiterated that we  
25 shouldn't talk about the President's location.

1 BY MR. WISENBERG:  
 2 Q That's two different things, though.  
 3 A Right.  
 4 Q One is that we shouldn't talk about the President's  
 5 location.  
 6 A Right.  
 7 Q One is we shouldn't talk about what happened that  
 8 day, the whole "incident." Do you understand the distinction  
 9 I'm making?  
 10 A Right. Sure.  
 11 MR. WISENBERG: And let me back up for a second --  
 12 Pardon me for butting in.  
 13 MS. WIRTH: That's all right.  
 14 BY MR. WISENBERG:  
 15 Q Were still -- chronologically, you're still up  
 6 there with Sergeant Williams having your first conversation  
 7 with Betty Currie, correct?  
 8 A That's correct.  
 9 Q Now, you testified last Friday, very limited scope,  
 0 you recall that?  
 1 A Right. Absolutely.  
 2 Q You were only asked them about what the President  
 3 said, correct?  
 4 A That was on my second visit.  
 5 Q That's the second visit of the day.

1 A In Betty Currie's office?  
 2 Q Right.  
 3 A No.  
 4 Q Other than that photographer who you saw at the  
 5 very beginning.  
 6 A In the beginning, who departed shortly thereafter.  
 7 Q All right. What did you do when you left Betty  
 8 Currie's office?  
 9 A Myself and Sergeant Williams went back to the  
 0 northwest gate.  
 1 Q When you left Betty Currie, was it understood  
 2 between you and her that you would come back and report to  
 3 her?  
 4 A I told Betty Currie as we were departing that I was  
 5 going to go out and talk to the officers and make sure they  
 6 didn't give out the location of the President or any of his  
 7 appointments and she at that point was satisfied and I said  
 8 something to the effect that once I'm done with that I will  
 9 come back. I don't know my words exactly that I said to her,  
 10 but I did indicate that I would return back to her office.  
 11 Q Were you telling her that you were going to make  
 12 sure that they had not done that that day or that they  
 13 wouldn't do it in the future?  
 14 A Kind of both.  
 15 Q All right. So where did you go next?

1 A Yes, sir.  
 2 Q All right. Just getting that --  
 3 A That did not occur during this visit.  
 4 MR. WISENBERG: Okay. Go ahead. Sorry.  
 5 BY MS. WIRTH:  
 6 Q Okay. So getting back to the question that I was  
 7 asking you before --  
 8 (Interruption to the proceedings.)  
 9 MR. WISENBERG: Let the record reflect that Ed Page  
 0 of our office, of the Office of Independent Counsel, has  
 1 entered the grand jury room.  
 2 BY MS. WIRTH:  
 3 Q okay. So getting back to the question I was  
 4 asking, was there anything that Betty Currie said that  
 5 inspired you or led you to believe it would be a good idea to  
 6 tell your officers not to speak about this incident?  
 7 A Not that I can remember.  
 8 Q Okay. Did you see the President at that time when  
 9 you went to see Betty Currie with Sergeant Williams?  
 0 A No, ma'am.  
 1 Q When you left, was the door to the Oval Office  
 2 still shut?  
 3 A To my belief, it was.  
 4 Q Did you see anybody else up there besides Betty  
 5 Currie?

1 A Back to the northwest gate or trailer.  
 2 Q Did you ever speak to Officer Chinery that day?  
 3 A I believe I did.  
 4 Q Did you speak to him on your way to Betty Currie's  
 5 office?  
 6 A Probably just acknowledged him, myself and Sergeant  
 7 Williams, on the way to Mrs. Currie's office the first time.  
 8 Q Did you speak to him on the way back from Betty  
 9 Currie's office at that point?  
 0 A I either spoke to him that time in acknowledgement  
 1 or told him, asked him -- there was a point, it was either  
 2 after the first visit or -- I'm jumping a little bit ahead of  
 3 myself here, after the second visit, I asked Officer Chinery  
 4 if he knew what was going on, which obviously he did know  
 5 what was going on because he made the phone call to Sergeant  
 6 Williams and he said yeah and I said, "Well, let's just make  
 7 sure that we kind of keep it under our hats."  
 8 And then he did make an inquiry to me at the time  
 9 if the officer was in trouble and I said, "I don't think so,  
 10 something to that effect.  
 11 Q Okay. Then as you left Betty Currie's office,  
 12 then, you proceeded down to the trailer. Whether you spoke  
 13 to Officer Chinery or not at that point --  
 14 A Right. It was one of the two trips. Right.  
 15 Q Okay. When you got down to the trailer, was

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1 Sergeant Williams with you?

2 A Yes, ma'am.

3 Q Did you discuss with Sergeant Williams on the way  
4 down what you would do when you got to the trailer?

5 A We probably did. I don't remember specifically if  
6 we did, but more than likely we did.

7 Q What did you do when you got to the trailer?

8 A I just basically reassured to Officer Hall, who at  
9 that time to me appeared visibly upset, that everything was  
10 under control. As far as I was concerned, the incident was  
11 pretty much resolved.

12 Q Did you ask him any questions about what had  
13 happened that day?

14 A No.

15 Q You said earlier that Officer Hall at that point  
16 did not acknowledge that k had given the President's  
17 location out and that was earlier. Did he acknowledge that  
18 at this time when you came back to the trailer?

19 A When he came back, he said something, "I might  
20 have, but I don't remember." And he also made a suggestion  
21 that it might have been talked about among the officers and  
22 Ms. Lewinsky may have heard it. In my mind set, I wasn't  
23 sure if Ms. Lewinsky at any time had been in the trailer or  
24 outside of tk trailer.

25 Q So you did not know at that point that she had been

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1 in the trailer?

2 A Well, I know at one point she had been inside the  
trailer.

Q Oh, but you didn't know if she had been in at the  
point when it was discussed?

6 A Right. Nor did Officer Hall remember.

7 Q Did you believe Officer Hall?

8 A Yes.

9 Q Did you speak to any of tk other officers besides  
10 Officer Hall?

11 A The other officers were all present at this time.

12 Q Did you speak to Officer Niedzwiecki?

13 A Yes, I did.

14 Q What did he say had happened?

15 A Officer Niedzwiecki basically had the same story  
16 that Officer Hall had.

17 Q Meaning what?

18 A That it was almost uncertain on how Ms. Lewinsky  
19 had overheard directly or indirectly tk location of the  
20 President.

21 Q All right. What --

22 A JUROR: Excuse me.

23 MS. WIRTH: Yes? -

24 A JUROR: Excuse me. Did you speak to the officers  
25 individually, separately, or together?

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1 THE WITNESS: They were all together.

2 A JUROR: This is Hall and Niedzwiecki?

3 THE WITNESS: And there was anotkr officer.

4 Officer Porter, present. There were three officers.

5 Yes, sir.

6 A JUROR: Thank you.

7 BY MR. WISENBERG:

8 Q Do you know whether or not Sergeant Williams might  
9 have questioned them separately before you got there?

0 A I think it's very possible, but I don't know for  
1 sure.

2 Q And did you discuss with them just the question of  
3 whether Ms. Lewinsky overheard the President's location or  
4 also the twin things of his location and the fact that  
5 Eleanor Mondale --

6 A They were grouped together. I mean, it wasn't a  
7 separate subject. They were both -- it was like an inclusive  
8 discussion.

9 Q Okay. And it was what about Eleanor Mondale, that  
0 she was in the White House for a tour or that she might have  
1 been in the Oval Office with the President?

2 A That she was in the Oval Office for a tour, I  
3 believe is the terminology that was used.

4 BY MS. WIRTH:

5 Q At this point, did you tell the officers that they

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1 should not discuss this incident?

2 A I believe I told the officers to use some  
3 discretion.

4 Q Okay. What does that mean?

5 A Basically that any time that they talk about the  
6 President, they need to be careful on who's around.

7 Q But with respect to this particular incident, did  
8 you give them any instructions about whether they could or  
9 should speak about it?

0 A I believe that was Sergeant Williams who did that.

1 Q What did he say?

2 A Pretty much that we need to kind of keep this quiet  
3 because we didn't want the rumors to get out on anything that  
4 did or didn't happen.

5 Q Do you know why Sergeant Williams said that?

6 A I just think it was just common sense that made him  
7 say that.

8 Q Had you instructed Sergeant Williams to say that?

9 A No.

20 Q Did you join in on that instruction that they  
1 should keep this quiet?

2 A It's possible. I don't believe I did, but it is  
3 possible that I did

4 Q All right. What happened after that?

5 A I went back and had a second meeting with

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1 Mrs. Currie.

2 Q Did you go by yourself?

3 A Yes, ma'am.

4 Q Do you know whether at any time up until that point  
5 Sergeant Williams had spoken to the President?

6 A At that point, no.

7 Q Do you know if later in the day he did?

8 A This is where I need to jump a little bit ahead in  
9 time. Do you want me to do that now?

10 Q Just briefly.

11 A Okay. About a week ago I heard a rumor that  
12 Sergeant Williams may have had a conversation with the  
13 President here.

14 I approached Sergeant Williams on it. Sergeant  
15 Williams made a statement to me that when he was in seeing  
16 Mrs. Currie the first time that the door to the Oval Office  
17 was left open a little bit and at that point I told Sergeant  
18 Williams that he needed to talk to the legal people, the  
19 Secret Service legal counsel.

20 Q Okay. So then --

21 A But during that day, that had not been brought up  
22 to me.

23 Q Okay. But Sergeant Williams did not go so far as  
24 to tell you that he had spoken to the President or he had  
25 not?

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1 A No, ma'am. That was not brought up.

2 Q AU right. So, anyway, getting back to the point  
3 of the story where we were, you were on your way back to  
4 Betty Currie's office.

5 A Right.

6 Q To talk to her. Do you know if you saw Officer  
7 Chinery on the way?

8 A I'm sure I saw him.

9 Q Did you speak to him? Do you remember?

10 A Not that I remember.

11 Q Are you friendly with him?

12 A Yes, I am.

13 Q Is it possible that you spoke to him?

14 A It's very possible.

15 Q All right. When you got to Betty Currie's office,  
16 what did you do?

17 A Again, Mrs. Currie stood up, she was seated at her  
18 desk. I knocked on the door, I walked in. She closed the  
19 door behind me.

20 She had me take a seat and I explained to her that  
21 I -- or basically reassured to her that the officers had been  
22 told not to talk about the President's location and who his  
23 appointments were and she was satisfied with that.

24 Q Did you give her any more information on what had  
25 happened that day?

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1 A Did I give her any more information? No.

2 Q Okay. Did you tell her that you had spoken to the  
3 officers involved?

4 A Yes.

5 Q Did you tell her what your opinion was of what had  
6 happened?

7 A Well, at that point, it was somewhat agreed upon  
8 before we left and it was also kind of reiterated that it is  
9 possible that she overheard the officers. It is possible  
10 that Ms. Lewinsky observed Ms. Mondale come into the White  
11 House.

12 Q Okay. And this conversation, just you and Betty  
13 Currie were present?

14 A Yes, ma'am.

15 Q All right. How was Ms. Currie's manner at that  
16 point?

17 A Somewhat more calm. In fact, I would say for lack  
18 of a better word normal.

19 Q Okay. And what did she say when you told her what  
20 you told her?

21 A She was -- in my opinion, she was satisfied with  
22 that explanation.

23 Q Did the subject of anybody being disciplined or  
24 fired or anything like that come up at this meeting?

25 A No.

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1 Q What happened next?

2 A Just right about that point, I heard the door from  
3 the Oval Office, which I'm sure you're aware there's a door  
4 right behind Mrs. Currie that leads to the Oval Office. It  
5 opened up and it was the President.

6 Q Okay. And was he alone?

7 A Yes, ma'am.

8 Q And what did he do?

9 A As he stood at the doorway, both Mrs. Currie and  
10 myself, we stood. Mrs. Currie introduced me to the President  
11 and the President -- he used the word "discretion," what his  
12 exact words were, I believe, and I have to stress I believe,  
13 it was "I hope you use your discretion."

14 Q Okay. And did you respond to that?

15 A I believe I said, "Yes, sir."

16 Q Can you tell the grand jury what the President's  
17 manner was when he said that?

18 A Again, you know, for lack of a better word, I  
19 believe normal.

20 Q Had you ever talked to the President before?

21 A Yes, ma'am.

22 Q Did he say anything more than that?

23 A No.

24 Q After you said, "Yes, sir," what happened?

25 A There was a pause at the time and I have to go back

1 to my feelings on this, I felt it was time for me to leave, I  
 2 told everybody, "Have a nice day," and I left. And I closed  
 3 the door behind me. The door was closed and I closed it  
 4 behind me.

5 Q Okay. And where did you go then?

6 A I went back down into our operations office, which  
 7 is in the basement of the Old Executive Office Building.

8 Q Okay. Did you speak to Officer Chinery on the way?  
 9 Do you know?

10 A Again, that's -- it was either on that time or the  
 11 time before, but one of the times I know I spoke with him.

12 Q And it was on that occasion that you said what?  
 13 Whenever you had that conversation.

14 A When I asked him if he knew what was going on,  
 15 obviously he did know what was going on, I said, Hey, just  
 16 kind of keep it under your hat.

17 Q Okay. Did you ever go back to the trailer that  
 18 day?

19 A No, ma'am.

20 Q Did you ever speak to Sergeant Williams again about  
 21 this incident?

22 A Later on in the day, he approached me and asked me  
 23 if I had a conversation with the President. And at that  
 24 time, I just kind of shook my head and I said, Hey, just  
 25 kind of keep that to yourself."

1 Q Did you tell him what the President had said to  
 2 you?

3 A No, ma'am.

4 Q Did he ask you?

5 A No.

6 Q Did he tell you that he had had a conversation with  
 7 the President?

8 A No, ma'am.

9 Q Did you discuss the incident with anybody else that  
 10 day?

11 A Yes, ma'am.

12 Q who?

13 A When I went down to our operations office, there  
 14 was at least one other lieutenant in that office, I believe  
 15 there were two. I had them leave the room, leave the office,  
 16 I locked the door behind them, and I called my deputy chief,  
 17 Charles O'Malley, at his home.

18 Q And you reported the incident to him?

19 A Yes, ma'am.

20 Q And what did he say?

21 A He pretty much agreed with the way that I handled  
 22 it.

23 Q Okay. Did he say anything else?

24 A In reference to?

25 Q Anything that you remember.

1 A No, ma'am.

2 Q Was any paperwork created on this incident?

3 A No, ma'am. That was one of the issues that the  
 4 deputy chief and I discussed on it.

5 Q And what did he say?

6 A It was my recommendation to him, of course, he  
 7 would have the final say, that no paperwork be generated as  
 8 far as memo writings and with that he asked if my feeling was  
 9 that this issue was over with and I said, "I believe it is  
 10 over with."

11 Q What was the basis for your advice that there not  
 12 be any paperwork?

13 A That Mrs. Currie was satisfied with the way things  
 14 were handled.

15 Q If you were to fill out any paperwork, what form  
 16 would you use or what --

17 A Probably a government memorandum, which is a  
 18 standard memorandum form and it would have gone to my deputy  
 19 chief from me.

20 Q To your knowledge, has anybody filled out any  
 21 paperwork at this incident?

22 A No, ma'am. To my knowledge, no paperwork has been  
 23 done.

24 BY MR. WISENBERG:

25 Q What would that have been, like a -- would that

1 memorandum have referenced a complaint by Ms. Currie about  
 2 something that occurred?

3 A Well, since I was involved in the issue, it would  
 4 have been a memorandum from me to my deputy chief explaining  
 5 what my involvement would have been in it and I probably  
 6 would have had the sergeant and at least Officer Hall write a  
 7 memo on it. And possibly Officer Chinery, because he  
 8 received the call from Mrs. Currie.

9 Q Would it have been the normal practice for this  
 10 kind of event to have written a government memorandum?

11 A If Mrs. Currie wasn't satisfied, it would have been  
 12 the normal practice.

13 Q Okay. Was your decision not to do a memorandum  
 14 influenced by the President's comments to you about  
 15 discretion?

16 A No, sir.

17 Q It was influenced by the fact that Ms. Currie  
 18 seemed satisfied?

19 A Right.

20 Q When the President walked out -- or walked in --  
 21 came out, you and Mrs. Currie stood up, You testified?

22 A Mm-hmm.

23 Q And did he stay in the doorway or did he come close  
 24 to you?

25 A He stood right in the doorway.

Page 3:

1 Q Did he ask you to come close to him?  
 2 A No, sir.  
 3 Q Had he been -- you had just been discussing this  
 4 matter with Mrs. Currie, is that correct?  
 5 A That's correct.  
 6 Q He didn't say "What's going on" or anything like  
 7 that?  
 8 A Mrs. Currie, as she introduced me, said "This  
 9 is the person in charge of the uniformed forces" or  
 10 "the uniformed division and the situation's been handled by  
 11 him," or something to that effect.  
 12 Q And then the President went right into his  
 13 discretion comment, is that correct?  
 14 A Yes, sir.  
 15 BY MS. WIRTH:  
 16 Q After you spoke to your commander, did you have any  
 17 further conversations with anyone that day about this  
 18 incident?  
 19 A Yes, I did.  
 20 Q Who?  
 21 A An agent from -- and I use the word [REDACTED], but do I  
 22 need to explain what [REDACTED] is?  
 23 Q Yes.  
 24 A [REDACTED] is the agents' command center, which is an  
 25 office in the West Wing which is directly [REDACTED]

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1 [REDACTED] It's the agents' down room.  
 2 Q You're talking about the president's protective  
 3 detail?  
 4 A Yes, ma'am.  
 5 Q Who was that person?  
 6 A At the time of our interview, I didn't remember his  
 7 name but I do remember it now. I believe it was Don Mite.  
 8 Q Don what?  
 9 A Mite.  
 10 Q Could you spell that?  
 11 A I have no idea.  
 12 Q Okay. Do you know him?  
 13 A No, ma'am.  
 14 Q Is this the first time you spoke to him?  
 15 A That I remember?  
 16 Q That you know of.  
 17 A sum. I mean, I'm sure I've spoken with him  
 18 before, but that's the first time I remember speaking with  
 19 him.  
 20 Q He called you?  
 21 A Yes, ma'am.  
 22 Q What did he say?  
 23 A At the time, I remember this pretty good, at the  
 24 time he said there was a lieutenant in Mrs. Currie's office  
 25 and he wanted to know if there was a problem and I explained

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1 to him it wasn't a lieutenant, it was in fact me.  
 2 And k said, "Well, was there a problem with one of  
 3 my agents?" I said, "No."  
 4 And he said, "Do you mind if I ask you what the  
 5 problem was?" And I said, "Well, it was a personal problem.  
 6 And again, k seemed satisfied with that.  
 7 Q Any further discussion?  
 8 A Sergeant Williams approached me in the hall.  
 9 Q That same day?  
 10 A Yes, ma'am.  
 11 Q And what happened there?  
 12 A I touched upon that a little while ago. He asked  
 13 me if I had a conversation with the President.  
 14 Q Right. Okay. Any further conversations that day  
 15 with anyone about this incident that you recall?  
 16 A No, ma'am.  
 17 Q Okay. Have you discussed this incident with  
 18 Sergeant Williams since that day other than the one  
 19 conversation that you mentioned about a week or so ago that  
 20 we're going to talk about in a minute?  
 21 A He's asked me a little bit, you know, about what  
 22 had happened when all the stories started breaking, but  
 23 nothing as far as into details at all.  
 24 Q When he asked what had happened, what do you mean  
 25 by that?

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1 A When the stories started breaking about our  
 2 involvement in this issue and the issue came up, k  
 3 approached me about it.  
 4 Q And said what?  
 5 A Just, you know, something to the effect that,  
 6 "Hey, is this going to affect us? Are we going to have  
 7 to testify?" That type of thing.  
 8 Q Other than that type of conversation, anything  
 9 else?  
 10 A No.  
 11 Q Did he ever review any of the details of what  
 12 happened that day with you?  
 13 A No, ma'am.  
 14 Q At any time since that day?  
 15 A No, ma'am.  
 16 Q How did you hear that Sergeant Williams had seen  
 17 the President that day?  
 18 A. That-I don't know. That's kind of -- I mean,  
 19 how do I think Sergeant Williams found out about that?  
 20 Q No. No. You said about a week ago you had a  
 21 discussion with Sergeant Williams about whether k had seen  
 22 the President and it was based on something you had heard.  
 23 A Right. During the past several -- couple of weeks  
 24 anyways, I've been gathering information for one of the  
 25 subpoenas that's been issued as far as our postings are

1 concerned and one of the sergeants -- well, I have one  
 2 sergeant assigned on this detail with me, he told me that he  
 3 heard that rumor.  
 4 Q Who was the sergeant?  
 5 A Sergeant Tom Mach.  
 6 Q M-o-c-k?  
 7 A M-a-c-h.  
 8 MS. WIRTH: M-a-c-h  
 9 MR. WISENBERG: Pardon me just a minute.  
 10 (Pause.)  
 11 BY MS. WIRTH:  
 12 Q All right. okay. Other than this incident that  
 13 you've testified about today, have you had any other  
 14 encounters or knowledge of any encounters with Monica  
 15 Lewinsky?  
 16 A I remember when she was assigned to the East Wing  
 17 of the White House.  
 18 Q Did you know her?  
 19 A Nothing more than exchanging, you know, hellos,  
 20 that type of thing.  
 21 Q Okay. Did you ever hear anything about any  
 22 relationship between her and the President at the time that  
 23 she was assigned to the White House or working at the White  
 24 House?  
 25 A I mean, of course I've heard things since, but at

1 the time, no.  
 2 MS. WIRTH: okay.  
 3 BY MR. WISENBERG:  
 4 Q I've got a couple of questions for you. Captain  
 5 Purdie. Now, you said that you were originally called on  
 6 this day by your operational lieutenant. Who was that?  
 7 A Lieutenant Joe Stump or Joseph Stump.  
 8 Q Okay. How do you spell that?  
 9 A S-t-u-m-p.  
 10 MR. WISENBERG: Let me show you real quickly what's  
 11 been marked as JJP-I.  
 12 (Grand Jury Exhibit No. JJP-I  
 13 was marked for identification.)  
 14 BY MR. WISENBERG:  
 15 Q Those are your initials, JJP, correct?  
 16 A That's correct.  
 17 Q And this is kind of a rough scheme of the West Wing  
 18 and it's a map with pre-printing and somebody's printed, also  
 19 handprinted, and that's not your printing, is it?  
 20 A No, it's not.  
 21 Q I want to show you the Oval Office here and you'll  
 22 see 8 door. Assuming the Oval Office is a clock, you'll see  
 23 a door going out at 1:00.  
 24 A Right.  
 25 Q To an area that is marked on this map as reception

1 area 1 and there's a little square or rectangle that says  
 2 BC for Betty Currie, or I'm going to say for Betty Currie.  
 3 Do you see that?  
 4 A Yes, sir. I do.  
 5 Q Okay. I want to just get for us so that we'll  
 6 know, when you met with Betty Currie, I think you said on  
 7 each occasion, did she close the door to her office?  
 8 A Yes, sir. And that would be this door here.  
 9 Q okay. That is the door?  
 10 A Yes, sir.  
 11 Q There's an arrow going through a zero or an O right  
 12 near that door, right?  
 13 A Right. The door adjacent to the hallway.  
 14 Q Okay. I need a red pen. Would you just do me the  
 15 favor of marking with a red pen approximately on this map  
 16 where that door was that she closed?  
 17 A Circle it?  
 18 Q Yes. A dot or circle. Okay. As far as you knew,  
 19 was there anybody other than Betty Currie in -- not counting  
 20 the Oval Office, but just in reception area 1, including the  
 21 interior office where Nancy Hernandez usually sits, was there  
 22 anybody else there other than you and on one occasion you  
 23 and -  
 24 A The photographer.  
 25 Q -- and Sergeant Williams. Well, after she got rid

1 of the photographer.  
 2 A Right. To my knowledge, there was nobody else  
 3 present.  
 4 Q Okay. On either of those meetings.  
 5 A On either of those. The first time it would be  
 6 Sergeant Williams, myself and Betty Currie.  
 7 Q Okay.  
 8 A And the second time it would have been Betty Currie  
 9 and myself.  
 10 Q And then the President came out in that second  
 11 meeting.  
 12 A Yes, sir.  
 13 Q Okay. Thank you. The only time that you spoke to  
 14 Sergeant Williams about this issue of whether or not he might  
 15 have seen the President that day was the one you've talked to  
 16 us about already, correct?  
 17 A Yes, sir.  
 18 MR. WISENBERG: Okay. That's all I had.  
 19 Can we ask you to step outside for just a moment or  
 20 two?  
 21 THE WITNESS: sm. In the hallway?  
 22 MS. WIRTH: Yes.  
 23 MR. WISENBERG: Yes. Just down tk hallway there.  
 24 We'll come get you in a minute or two.  
 25 (Witness excused. Witness recalled.)

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1 MR. WISENBERG: Let the record reflect that Captain  
2 Purdie has reentered the grand jury room.

3 Madam Foreperson, are there any unauthorized  
4 persons here?

5 THE FOREPERSON: No, there are none.

6 MR. WISENBERG: And what's the other question?  
7 And we do have a quorum?

8 THE FOREPERSON: Yes, we do.

9 MR. WISENBERG: Thank you

0 MS. WIRTH: Captain Purdie, I'd like to remind you  
1 that you are still under oath.

2 THE WITNESS: Yes, ma'am.

3 BY MR. WISENBERG:

4 Q There are some questions that the grand jurors  
5 wanted asked and I will ask them and they might also have  
6 some further questions that they'll personally ask.

7 A Okay.

8 Q When you went back at either time that day, when  
9 you were talking to the officers in the trailer, did you  
0 reprimand them at all, mildly or otherwise, for telling  
1 anybody the President's location?

2 A No.

3 Q Did you reprimand them in any way, mildly or not,  
4 about putting themselves in a situation where somebody could  
5 overhear talk either among officers or on a radio about the

1 he's just & parted from the elevator. He's two minutes  
2 away."

3 Q So somebody who is a fairly high level --

4 A Sure. Depending on who the person is.

5 Q How about somebody who is not an official employee,  
6 but who is a very important person, like a Vernon Jordan?

7 What if a Vernon Jordan --

8 A I don't believe -- my gut feeling is that wouldn't  
9 be appropriate to tell.

10 Q Okay. Now, how about the idea of letting somebody  
11 even into that trailer?

12 A People come in that trailer all the time, sir.

13 Q Is there a policy against that?

14 A No, sir.

15 Q Even though it puts them in a position where they  
16 might be more than likly to hear the President's location?

17 A Well, the trailer is actually a main entrance post  
18 to the White House grounds.

19 Q Okay. But I take it also people shouldn't be in a  
20 position where they overhear on a Secret Service radio the  
21 President's location.

22 A That's correct.

23 Q Is that correct?

24 A That's correct.

25 Q Now, what I want to ask now is did you feel if the

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Page 4.

1 President's location?

2 A No. I reminded them that they shouldn't. Now, to  
3 me there's a clear-cut difference. A reprimand is done on a  
4 one-on-one basis.

5 Q What was it exactly that you reminded them of?

5 A I reminded them as a group that whenever they're  
7 talking about the location of the President or any  
8 presidential guest, they need to be sure nobody is listening.

3 Q Okay. And how serious of a rule is that in the  
3 Secret Service?

1 A You know, it's a policy. I don't know if I can  
2 really come out with saying the severity of it. There's a  
3 lot of contingents that are in there with that.

4 Q Would one contingent be if it's somebody who they  
5 know visits the White House a whole lot and sees the  
5 President a lot, somebody who's fairly important, would that  
7 be a contingency where, as an example, it wouldn't be that  
3 weird of a thing to say where the President is?

9 A Well, really, by policy, we're not supposed to tell  
0 anybody where the President is.

1 Q Right.

2 A But I'll give an example, if the Chief of Staff  
3 calls out, walks out to one of the posts or Mrs. Currie walks  
4 out and says, "Is the President en route to the Oval Office?"  
5 It would be appropriate for the officer to say, "Yes, ma'am,

1 only issue was, and I'm not trying to downplay the importance  
2 of it, but if the only issue was revealing the President's  
3 location to somebody who had been to the White House before,  
4 was not considered a threat, did you feel that the situation  
5 when you came on the scene, the kind of upsetness of  
6 Mrs. Currie and the President, according to what she said,  
7 was kind of out of proportion to just somebody was told where  
8 the President's location was?

9 A If I understand the question correctly, I really  
10 didn't give it any thought to why they were upset, I just --  
11 the fact that she was upset was evident to me when I first  
12 visited her.

13 Q That was your main concern.

14 A Yes, sir.

15 Q Has this ever been done before, where the location  
16 gets revealed?

17 A I'm sure. Yes.

18 Q Are you aware of anyone who's ever been reprimanded  
19 for it?

20 A Not that I can remember in recent history.

21 Q Okay. What was the big deal that the President of  
22 the United States or the executive secretary to the President  
23 of the United States and/or the President were so upset over  
24 the violation of this policy?

25 A I never gave that any thought. When I first

<p style="text-align: right;">Page 49</p> <p>1 visited Mrs. Currie, my main concern was that she was upset  2 and she is a high ranking passholder.  3 Q Why do you think she told you, and you correct me  4 if I get it wrong, why do you think she told you that this  5 information that Monica Lewinsky was told about the fact that  6 Eleanor Mondale was with the President, why do you think she  7 shared those specifics with you?  8 A Again, I think that was the root of the problem, of  9 why she was upset.  10 Q The root of tk problem in what sense? Just that's  11 what happened that day?  12 A Mrs. Currie was upset and I believe that's why she  13 was upset.  14 Q Okay. Do you think she was upset because it was  15 those two individuals, Monica Lewinsky and Eleanor Mondale?  16 A I really couldn't give an answer to that. What I  17 can give an answer to, she was upset.  18 Q You had mentioned on this issue of Sergeant  19 Williams, assuming that Sergeant Williams did talk to the  20 President that day --  21 A Okay.  22 Q Would one of the reasons that he might not  23 volunteer that to you have to do with rank, the fact that the  24 President would k talking to him about it before k talked  25 to you?</p>	<p style="text-align: right;">Page 51</p> <p>1 A JUROR: That's right.  2 THE WITNESS: It was about a week ago or so.  3 A JUROR: I understand. Thank you.  4 BY MR. WISENBERG:  5 Q Did Sergeant Williams ever tell you that he  6 personally overheard the President say anything?  7 A No, sir.  8 Q On that day?  9 A No, sir. When Sergeant Williams told me what I  10 just explained about the door being cracked, k continued to  11 go on. I can only surmise what he was going to tell me, but  12 I don't think it would be fair to Sergeant Williams, wouldn't  13 be fair to anybody.  14 MR. WISENBERG: Okay. Fair enough.  15 Any other questions?  16 (No response.)  17 MR. WISENBERG: If there are no more questions, may  18 the witness be excused?  19 THE FOREPERSON: Yes, k may.  20 MR. WISENBERG: Thank you very much.  21 THE FOREPERSON: You are excused.  22 THE WITNESS: No more questions?  23 MS. WIRTH: No.  24 MR. WISENBERG: No.  25 THE WITNESS: Thank you.</p>
<p style="text-align: right;">Page 50</p> <p>1 A I know Sergeant Williams personally. First of all,  2 I don't know for sure if k did talk to tk President. When  3 I approached him about it at a later date, which wasn't that  4 long ago from today's date, he told me that the door to the  5 Oval Office was cracked and at that point I told him that k  6 needed to talk to the Secret Service legal counsel. And in  7 generalities, I don't think that would have anything to do  8 with rank, why k wouldn't -- if that in fact did happen, and  9 I don't know in fact it did happen.  10 A JUROR: Excuse me. Why did you advise him to  11 talk to counsel because the door had been cracked? What  12 prompted you?  13 THE WITNESS: Well, I had heard a rumor that  14 Sergeant Williams had a conversation with the President.  15 And I approached Sergeant Williams about this rumor and when  16 he told me that when he was in with Mrs. Currie on his first  17 visit, which was by himself, I believe he was by himself in  18 the office at that time, that the door to the Oval Office was  19 cracked.  20 Before Sergeant Williams could tell me any more  21 about this issue, I told him pretty much that I didn't want  22 to discuss it with him, I think he needed to seek our legal  23 counsel.  24 A JUROR: Oh, this is recently.  25 THE WITNESS: Yes, sir.</p>	<p style="text-align: right;">Page 52</p> <p>1 MS. WIRTH: Thank you.  2 THE FOREPERSON: You are excused. Thank you.  3 (The witness was excused.)  4 (Whereupon, at 4:04 p.m., the taking of testimony  5 in the presence of a full quorum of the Grand Jury was  6 concluded.)  7 *****</p>



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- x  
: RE: :  
GRAND JURY PROCEEDINGS :  
----- x

Grand Jury Room No. 3  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001

Tuesday, August 11, 1998

The testimony of JEFFREY JAMES PURDIE was taken in  
the presence of a full quorum of Grand Jury 97-2, impaneled  
on September 19, 1991, commencing at 4:18 p.m., before:

MARY ANNE WIRTH  
EDWARD J. PAGE  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.Y.  
Suite 490 North  
Washington, D.C. 20004

1 Q So you've never been invited to a dinner in the  
2 residence of the White House?  
3 A The private residence, no, ma'am.  
4 Q Okay. When you say a Secret Sea-vice Christmas  
5 function, what is that?  
6 A They have a party for Secret Service where they  
7 also invite some White House staff and military. Last year.  
8 I believe it was about 300 to 500 people, somewhere in that  
9 area, people that are invited. It's a Christmas reception.  
10 You come in -- it's just like any social function at the  
11 White House. They give you a number and you get your picture  
12 taken with the President and you get hors d'oeuvres and  
13 beverages.  
14 Q Okay. And that is not in the residence, that's in  
15 the main part?  
16 A That would be on the ground floor or the state  
17 floor, which are considered the public rooms of the White  
18 House.  
19 Q Okay. And did you attend such a Christmas function  
20 in December of 1997?  
21 A Yes, I believe I did.  
22 Q Okay. And had you attended one like that  
23 previously?  
24 A Yes, ma'am.  
25 Q Okay. Do you go every year?

Page 2

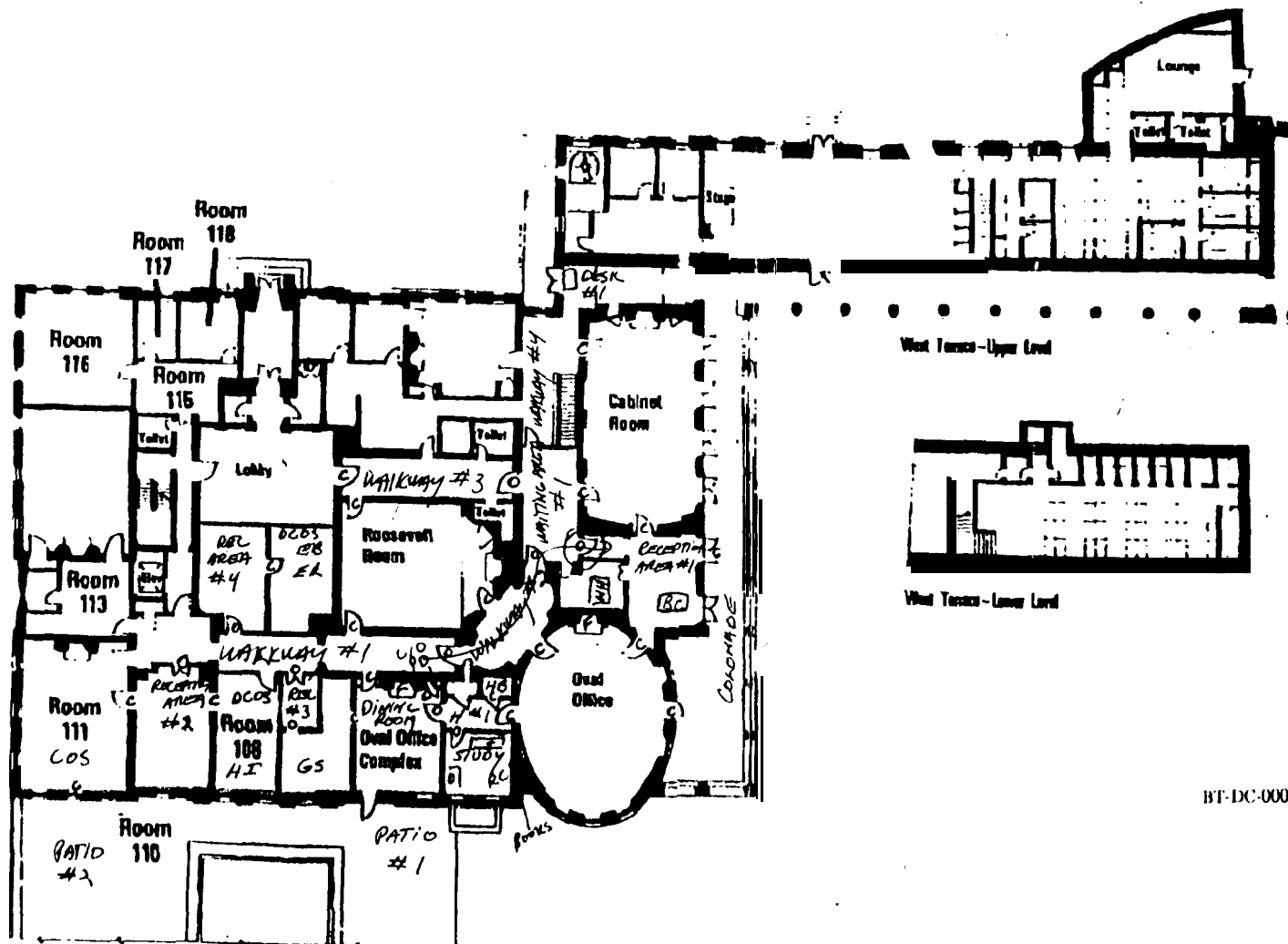
1 PROCEEDINGS  
2 Whereupon,  
3 JEFFREY JAMES PURDIE  
4 was called as a witness and, after having been first duly  
5 sworn by the Foreperson of the Grand Jury, was examined and  
6 testified as follows:  
7 EXAMINATION  
8 BY MS. WIRTH:  
9 Q Captain Purdie, do you remember your rights and  
10 responsibilities as a witness in the grand jury as they were  
11 explained to you the last time you appeared?  
12 A Yes, I believe I do.  
13 Q Okay. And you understand that you've taken an oath  
14 to tell the truth today, correct?  
15 A Yes, ma'am.  
16 Q Okay. Can you tell the grand jury whether you have  
17 ever been invited to a dinner in the residence?  
18 A When you say "the residence" --  
19 Q Of the White House.  
20 A I have been invited to social functions as well  
21 as other captains at the White House, meaning the Christmas  
22 party. It's called the Secret Service Christmas party.  
23 But as far as in the private residence, meaning the second  
24 floor, no, ma'am. I have not. However, I have heard those  
25 rumors as well as you have.

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1 A There may have been one year I didn't go because of  
2 my wife being pregnant, but every year that I've been  
3 invited -- all captains in the uniform division and above are  
4 invited. Excuse me. All captains at the White House are  
5 invited.  
6 Q All right. And other than the Secret Service  
7 Christmas party, have you ever been to any other parties in  
8 the White House?  
9 A Not when I wasn't working. No, ma'am.  
10 Q Okay. Okay. Other than the conversation that  
11 you've testified about previously that you had with the  
12 President on the day of the incident --  
13 A Yes, ma'am.  
14 Q Approximately December 6, 1997, when the President  
15 said something to you to the effect of -- something about  
16 discretion?  
17 A The word "discretion" was used. Yes, ma'am.  
18 Q Use your discretion. Other than that conversation,  
19 have you had any other conversations with the President about  
20 the incident at the northwest gate?  
21 A No, ma'am.  
22 MS. WIRTH: Okay. We're going to ask you to step  
23 outside for just a moment.  
24 THE WITNESS: okay.  
25 MS. WIRTH: Thanks.

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# First Floor



BT-DC-00000001