

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/4/98

URSULA "URSIE" FAIRBAIRN, Executive Vice President, Human Resources and Quality, AMERICAN EXPRESS, INC. (AE) was made available for interview by AE Corporate attorney, MARK BELNICK, at the AE Financial Center Tower, 200 Vessey Street, New York, NY. BELNICK and his associate JOYCE SZUYUN HUANG of the law firm PAUL, WEISS, RIFKIND, WHARTON and GARRISON, 1285 Avenue of the Americas, New York City, NY were present during the interview. All persons present were advised of the purpose of the interview and the official and personal identity of Investigator BASTIN and FBI Special Agent PATKUS. FAIRBAIRN thereafter provided the following information.

On December 10 or 11, 1997 FAIRBAIRN learned that she had a message indicating that VERNON JORDAN had called and would like for her to return the call. FAIRBAIRN called JORDAN at telephone number [REDACTED] JORDAN said he would like to send FAIRBAIRN a resume of a talented young lady and see if she matches up with any company openings. FAIRBAIRN agreed to talk to her and JORDAN said he would send the resume. FAIRBAIRN thought he was going to send the resume by fax, however it arrived by Federal Express.

FAIRBAIRN stated that it was not unusual for board members or other company officers to recommend talented people for employment with AE.

FAIRBAIRN said JORDAN did not mention BETTY CURRIE or any other WHITE HOUSE official in the telephone call and additionally there was no perceived pressure exerted by JORDAN. JORDAN has made another employment recommendation approximately two months ago.

After receiving the cover letter and resume from LEWINSKY, it was a few days before LEWINSKY called. FAIRBAIRN believes she called on December 15, 1997 and the conversation lasted 7 to 10 minutes. LEWINSKY was cordial and pleasant and expressed a desire to obtain employment in the areas of Communications or Governmental Relations. FAIRBAIRN concluded that both of these areas were under THOMAS SCHICK and she therefore informed LEWINSKY that she would check with him in order to get the process started. FAIRBAIRN recalls LEWINSKY

Investigation on 1/29/98 at New York City, NY File # 29D-LR-35063
 by SA [REDACTED]
 CI [REDACTED] Date dictated 2/4/98

29D-LR-35063

Continuation of OIC-302 of Ursula Fairbairn, On 1/29/98, Page 2

mentioning working at the Pentagon and the WHITE HOUSE but does not recall discussing in detail her work experiences in this phone call.

FAIRBAIRN wrote a note to TOM SCHICK on December 16, 1997 telling him that the attached resume was forwarded to AE by VERNON JORDAN and that HARVEY GOLUB, Chairman of the Board (COB), AE, is aware of the recommendation. FAIRBAIRN stated that it is her policy to always advise the COB when an employment recommendation comes from one of the members of the board.

FAIRBAIRN recalls that she saw SCHICK in the building on the 16th and mentioned the resume to him, he indicated that he would be in Washington the following week and asked FAIRBAIRN to call LEWINSKY and give her his telephone number so that maybe the interview could be done while he was in Washington. FAIRBAIRN called LEWINSKY and gave her SCHICK's telephone number.

FAIRBAIRN remembers receiving a "thank you" letter from LEWINSKY and kept it for a period of time next to her telephone just in case JORDAN called and inquired about the progress. She didn't receive a call and she didn't follow up with any other contacts.

FAIRBAIRN then recalls reading about the controversy in the newspaper. She has not been contacted by anyone at the WHITE HOUSE concerning LEWINSKY nor has she been contacted by JORDAN since the controversy received publicity.

FAIRBAIRN is described as follows from observation and interview.

NAME:	Ursula Fairbairn
SEX:	Female
RACE:	Caucasian
DOB:	[REDACTED]
SSAN:	[REDACTED]
RESIDENCE:	[REDACTED]
TELEPHONE:	[REDACTED]
EMPLOYMENT:	American Express, Inc.
TITLE:	Executive Vice President, Human Resources and Quality

29D-LR-35063

Continuation of OIC-302 of Ursula Fairbairn . On 1/29/98 . Page 3

TELEPHONE: 

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 2
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001

vs
Friday, July 17, 1998

The testimony of ROBERT C. FERGUSON was taken in
the presence of a full quorum of Grand Jury 97-4, impaneled
on December 5, 1997, commencing at 2:43 p.m., before:

ROBERT J. BITTMAN
SOLOMON MISENBERG
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

PROCEEDINGS

1
2 Whereupon,
3 ROBERT C. FERGUSON
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:

EXAMINATION

7
8 MR. PAGE: All right. Mr. Foreperson, may I begin?
9 THE FOREPERSON: Actually, it's Madam.
10 MR. PAGE: I'm sorry. Madam Foreperson, may I
11 begin?

12 THE FOREPERSON: Yes, you may. Thank you.
13 MR. PAGE: Thank you.

14 I'd like the record to reflect that we have a
15 quorum and, is it true, Madam Foreperson, that there are no
16 unauthorized individuals in the grand jury room?

17 THE FOREPERSON: Yes.

18 MR. PAGE: Thank you.

19 BY MR. PAGE:

20 Q Mr. Ferguson, my name is Edward J. Page. I have
21 the honor and privilege of working for Mr. Starr, who is the
22 Independent Counsel in regard to certain matters. Do you
23 understand that?

24 A Yes, sir. I do.

25 Q Thank you. This is what's called a grand jury and

CONTENTS

WITNESS:	Page
Robert C. Ferguson	3
GRAND JURY EXHIBITS:	
No. RF-1 Schematic of West Wing	22

1 you are in front of a group of citizens here to answer some
2 questions that I will be asking you. All right?

3 There is a court reporter present. He's seated to
4 your right. That's not a microphone. He is recording what
5 you're saying and what I'm saying and what questions the
6 grand jurors might have of you, should they have any.

7 A Yes, sir.

8 Q Do you understand?

9 A Yes, sir.

10 Q All right. Before I ask you the questions that we
11 have for you, I need to explain some things for you. If at
12 any time you have a question about those, please interrupt
13 because it's easier to deal with questions when they arise
14 rather than if you save them.

15 First of all, any things that would prevent you
16 from testifying here today? For example, you don't have any
17 hearing problems?

18 A No, sir. I have no reason.

19 Q All right. Do you understand what we're talking
20 about today? You've been following so far?

21 A Yes, sir.

22 Q All right. Do you understand, number one, that
23 what goes on today in front of the grand jury, the questions
24 and the answers, are secret under law and that none of the
25 people here except one can tell other people what happens in

Page 5	Page 7
<p>1 the grand jury?</p> <p>2 A Yes, sir. I understand.</p> <p>3 Q The one person I left out is you and that is you</p> <p>4 have a right after you leave here to share with people what</p> <p>5 happened here today, should you choose. Do you understand</p> <p>6 that?</p> <p>7 A I do.</p> <p>8 Q Do you understand by my visiting with you about</p> <p>9 this law that I'm not suggesting in any manner what you</p> <p>10 should do later on with regard to that right?</p> <p>11 A Yes, sir. I understand.</p> <p>12 Q Do you understand that you can speak of your own</p> <p>13 free will to whomever you choose?</p> <p>14 A Yes, sir. I do.</p> <p>15 Q Under the law, you have certain rights before your</p> <p>16 testimony is given in front of a grand jury. Do you</p> <p>17 understand that?</p> <p>18 A I do.</p> <p>19 Q All right. I want to read to you now some of those</p> <p>20 rights, making sure that you understand them before we go</p> <p>21 forward. Okay?</p> <p>22 A Yes, sir.</p> <p>23 Q The first right that I want to tell you about is</p> <p>24 more of a general nature, to tell you what this is about,</p> <p>25 and that is that the grand jury here is conducting an</p>	<p>1 A I understand.</p> <p>2 Q Do you have a lawyer?</p> <p>3 A No, sir.</p> <p>4 Q All right. You seemed to hesitate when I asked</p> <p>5 that.</p> <p>6 A Well, the reason being is there were some issues</p> <p>7 earlier regarding some of the security information that may</p> <p>8 be asked and, in that regard, Justice has picked up that</p> <p>9 proceeding for us, so if in fact that were to become an</p> <p>10 issue, I would like the opportunity to confer with them.</p> <p>11 Q All right. That's the Department of Justice.</p> <p>12 A That's correct.</p> <p>13 Q Is there an individual with whom you've been</p> <p>14 dealing?</p> <p>15 A Ann Weisman.</p> <p>16 Q Do you understand that besides the items that</p> <p>17 you've mentioned, the only rule that you can invoke here to</p> <p>18 avoid testifying is a rule that governs privileged</p> <p>19 information? For example, the marital privilege, the</p> <p>20 attorney-client privilege, the psychologist or psychiatric</p> <p>21 privilege?</p> <p>22 A Yes, sir. I understand.</p> <p>23 Q All right. There is no, as you're probably well</p> <p>24 aware by now, a protective function privilege.</p> <p>25 A I understand that. Yes, sir.</p>
<p>Page 6</p> <p>1 investigation of possible violations of federal criminal</p> <p>2 laws involving whether Monica Lewinsky or others suborned</p> <p>3 perjury, obstructed justice, intimidated witnesses or</p> <p>4 otherwise violated federal law, other than a class B or C</p> <p>5 misdemeanor or infraction, in dealing with witnesses,</p> <p>6 potential witnesses, attorneys or others concerning the civil</p> <p>7 case Jones v. Clinton. All right? The grand jury is also</p> <p>8 investing other related matters. Do you understand that?</p> <p>9 A I do, sir.</p> <p>10 Q Do you understand that you may refuse,</p> <p>11 Mr. Ferguson, to answer any question if a truthful answer</p> <p>12 to it would tend to incriminate you?</p> <p>13 A Yes, sir. I understand that.</p> <p>14 Q That's commonly called your Fifth Amendment right.</p> <p>15 A Yes, sir.</p> <p>16 Q Do you understand that?</p> <p>17 A I do, sir.</p> <p>18 Q Anything further that you do say may be used</p> <p>19 against you by the grand jury or in a subsequent legal</p> <p>20 proceeding. Do you understand that?</p> <p>21 A I do understand that.</p> <p>22 Q If you have a lawyer, the grand jury will permit</p> <p>23 you a reasonable opportunity to step outside the grand jury</p> <p>24 room to consult with that lawyer if you so desire. Do you</p> <p>25 understand that?</p>	<p>Page 8</p> <p>1 Q Do you understand that?</p> <p>2 A I do.</p> <p>3 Q And, in fact, that's why you're now here, correct?</p> <p>4 A Yes, sir.</p> <p>5 Q Do you understand that the law makes a distinction</p> <p>6 between being a target of a grand jury investigation and a</p> <p>7 subject?</p> <p>8 A Yes, sir. I do.</p> <p>9 Q All right. I represent to you now at this time</p> <p>10 that you are a subject of this grand jury investigation</p> <p>11 because that is defined as someone whose conduct, meaning</p> <p>12 whose actions in the past, are within the scope of the grand</p> <p>13 jury's investigation and, in your situation, I represent to</p> <p>14 you that it's in a broad sense in the sense that you may be a</p> <p>15 fact witness to some things the grand jury is looking at</p> <p>16 under that mandate that I read earlier. Do you understand</p> <p>17 that?</p> <p>18 A Yes, sir. I do.</p> <p>19 Q All right. Do you understand that you have to tell</p> <p>20 the truth here today and that you've taken an oath to do</p> <p>21 that?</p> <p>22 A I do.</p> <p>23 Q All right. Do you understand that I'm going to be</p> <p>24 asking questions and you will answer and then the grand jury</p> <p>25 will have an opportunity as well as my colleagues to ask</p>

Page 9	Page 11
<p>1 you questions and to answer? Sort of like playing tennis: 2 I serve you a question and you volley back with an answer. 3 Do you understand that? 4 A I do. 5 Q Have you ever testified before? 6 A Before a grand jury? 7 Q Or in any situation. 8 A Oh. Yes, sir. 9 Q Under oath. 10 A Yes, sir. 11 Q So you know what this process is. 12 A Yes, sir. 13 Q All right. Do you have an understanding right now 14 as you sit there about whether you should volunteer 15 information or just answer the questions as they're put? 16 A I will answer you as truthfully and fully as I can. 17 Q All right. In other words, I'm telling you that I 18 will probably need your help along the way in bringing out 19 all of the information and I would ask you to volunteer where 20 you think it's appropriate. 21 A I can assure you, sir, that I will answer you fully 22 and to all of the information, the extent that I have. 23 Q As a part of your obligation to tell the truth here 24 because you're under oath, do you understand that you can't 25 without basis say you forget or you can't remember when in</p>	<p>1 Q Those are the only two official categories that 2 the Department of Justice recognizes, but there is an 3 unofficial -- and a subject is basically anybody who has 4 information relevant to the grand jury. Do you understand 5 that? 6 A I do. 7 Q There is an informal designation that has grown up 8 among prosecutors and defense attorneys of target, subject 9 and witness. Within that category, you would be considered a 10 witness. Do you understand that? 11 A I do. 12 MR. WISENBERG: All right. 13 Pardon me for the interruption. 14 BY MR. PAGE: 15 Q Okay. Before we get started, do you have any 16 questions about the topics that we've discussed? 17 A No, sir. 18 Q All right. Where do you live? 19 A I live in Davison, North Carolina. 20 Q And how long have you worked there? I'm sorry, 21 lived there. 22 A Lived there? I've lived there approximately two 23 and a half months, sir. 24 Q Were you previously employed or do you now work? 25 A Yes, I was previously -- I do now work, but I was</p>
Page 10	Page 12
<p>1 fact you can? 2 A Oh, I understand. Yes, sir. 3 Q All right. Do you understand, finally, that the 4 oath that you took earlier makes your statements here if they 5 are false subject to the penalties of perjury and obstruction 6 of justice in some cases? Do you understand that? 7 A Yes, sir. I do. 8 Q Do you understand that those two crimes are 9 felonies punishable by up to five years in jail and a fine? 10 A Yes, sir. 11 Q All right. All right. I would ask you to speak 12 loudly so that the woman in the far left of this room can 13 hear you as well as my colleagues and the court reporter and 14 the foreperson. Do you have any problem with that? 15 A No, sir. 16 MR. WISENBERG: Ed, pardon me just a minute. Can I 17 clarify one thing? 18 MR. PAGE: Yes. 19 MR. WISENBERG: My name is Sol Wisenberg. I'm also 20 with the Office of Independent Counsel. 21 BY MR. WISENBERG: 22 Q Mr. Page mentioned to you the categories of target 23 and subject and said that you were a subject. Do you recall 24 that? 25 A I do.</p>	<p>1 previously employed by the United States Secret Service. 2 Q For how long? 3 A Approximately 14 years. 4 Q Your last assignment was where? 5 A With the Special Services Division of the Secret 6 Service and prior to that the Presidential Protective 7 Division. 8 Q All right. Can you tell the grand jury 9 approximately the timeframe that you worked or that spanned 10 your service with the protective detail? 11 A With the protective detail? Approximately, and 12 these are approximations, sir, late 1994 through January of 13 '97. 14 MR. WISENBERG: Pardon me just a minute. 15 BY MR. WISENBERG: 16 Q Could you state your name for the record, please? 17 A Certainly. It's Robert C. Ferguson. 18 MR. WISENBERG: I'm sorry. 19 BY MR. PAGE: 20 Q All right. Go ahead with your dates again. 21 A Approximately late 1994 until early 1997. 22 Q And those dates are the dates that you were 23 assigned to the presidential protective detail? 24 A Yes, sir. That's correct. 25 Q Tell the grand jury what that is.</p>

Page 13

1 A The Presidential Protection Division is men and
 2 women who have had former assignments throughout the United
 3 States Secret Service, generally on duty between seven and
 4 ten years, and you are chosen or are assigned to a detail
 5 that would guard, in this case, the President of the United
 6 States for a 24-hour basis. You're generally there
 7 between -- depending on your promotional considerations,
 8 you're generally on that detail approximately four years.
 9 Your responsibilities would be the obvious
 10 protection of the President of the United States, which
 11 has many facets. You're going to have a working shift
 12 of individuals which are the four to five to six men and
 13 women that you see around the President at any one time.
 14 We have various functions which is our intelligence
 15 community and also what we call our advance function, which
 16 are those that go out in advance of the President and the
 17 First Lady and obviously Chelsea in regards to the United
 18 States and prepare for their coming to a particular location.
 19 Very elementary, that's what your assignment would
 20 be for that period of time.
 21 Q All right. During the course of your assignment
 22 from late '94 to early 1997, did you meet a person by the
 23 name of Monica Lewinsky?
 24 A I know who Monica Lewinsky is. I don't know her
 25 personally, no.

Page 14

1 Q You never said hi to her or met her where you were
 2 introduced?
 3 A No, sir. Not introduced. I may have spoken to her
 4 on an occasion I'll be happy to discuss, but I do not know
 5 her personally.
 6 Q So your testimony is you never met her, but you
 7 know her.
 8 A That's correct. Yes. That's correct.
 9 Q How did you first know her?
 10 A The dates in the testimony I'm about to give you is
 11 the absolute best of my recollection. My first encounter
 12 with Monica Lewinsky was, to the best of my recollection, the
 13 winter, I believe it to be in December, of 1996. I recall it
 14 being during the week.
 15 I recall it being on an average -- I don't know
 16 what day of the week, but I would expect it was Monday
 17 through Friday, one of those days. It was not a weekend and
 18 there are reasons that I recall that, but it was during the
 19 normal course of business and I was working a protective
 20 shift which are the men and women that are around the
 21 President for that period of time.
 22 I was on a post [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

Page 15

1 [REDACTED] The President of the United States was in the
 2 Oval Office at that time.
 3 Most of the people who work in the West Wing of the
 4 White House are commonly known to all of the agents. We
 5 work with them on a daily basis, those comings and goings.
 6 There are those presidential appointments who we do not know
 7 that we pay more direct attention to because they are not
 8 immediately recognizable to us and we would know them.
 9 Obviously to get into those locations, they've had
 10 to go through many security checkpoints and they are issued a
 11 pass that they would wear obviously to be into those
 12 particular areas.
 13 The reason I did not know who she was, she came
 14 from the hallway past the Oval Office which would be --
 15 the offices housed would have been down the hall,
 16 Mr. Stephanaopoulos' office, the vice presidential office.
 17 The reason being there is a stairwell that comes up into that
 18 level and I did not know Mrs. Lewinsky at that time and the
 19 only reason I recall that, and I can recount this for you, is
 20 that I did not recognize her face and I immediately looked
 21 down for her pass and found it to be proper.
 22 I know that Mrs. Lewinsky -- I may have said hello
 23 or I may have said excuse me, which would have been something
 24 that we commonly would have done to stop that person for
 25 recognition purposes, just for a moment, just to make sure

Page 16

1 that everything is fine before you're actually going into
 2 what we considered to be the West Wing suite, which would
 3 house Mrs. Currie, the President's personal secretary, and
 4 Mrs. Nancy Herreich, who is the President's appointments
 5 secretary.
 6 Now, this is not into the oval itself, but just
 7 into that suite of offices outside of the oval but are
 8 adjacent to.
 9 I do believe that I would have said something to
 10 her, to pause for a moment. We would see the pass and there
 11 was -- under a reasonable course, we would have allowed them
 12 to go into that suite of offices.
 13 I know that Mrs. Lewinsky went into those offices
 14 and, further than that, I had no other dealings or viewed
 15 Mrs. Lewinsky in any way.
 16 We have a rotational shift that would -- you're not
 17 going to stand in one location for hours and hours at a time.
 18 We rotate those assignments so you have some down time, so
 19 you can get off your feet, hopefully, particularly if the
 20 President's in the Oval Office for a long period of time.
 21 So I viewed Mrs. Lewinsky go into the office at
 22 that time, don't know where she went inside the office and
 23 I was subsequently pushed -- I mean left that post, was
 24 replaced by another agent, and I went to another post, so
 25 that's my first encounter with Mrs. Lewinsky at all.

Page 17	Page 19
<p>1 Q What time of day was this, approximately?</p> <p>2 A It was during daylight hours, during a normal</p> <p>3 working day, which is generally nine to five at the White</p> <p>4 House, but, other than that, I have no specific recollection</p> <p>5 of what time of day it would have been.</p> <p>6 Q Do you remember the agent that replaced you?</p> <p>7 A I don't, sir.</p> <p>8 Q So where does Ms. Lewinsky come from again this</p> <p>9 day?</p> <p>10 A Well, she came from -- which would be west to east,</p> <p>11 but she came from a hallway -- she would have come up, I</p> <p>12 assume, depending if she in fact had come from wherever she</p> <p>13 was coming from, which is not unusual, but she came from a</p> <p>14 hallway which would have been from like the vice presidential</p> <p>15 offices, which are located at one end of the hall, past the</p> <p>16 Oval Office, to where Mrs. Currie and Mrs. Herreich's office</p> <p>17 would be.</p> <p>18 And so I was -- if in fact the door here is an</p> <p>19 example, this room would have been into the suite, I would</p> <p>20 have been posted approximately where we are currently,</p> <p>21 Mrs. Lewinsky would have come down the hall, we would have</p> <p>22 said something to her to stop, just to make sure it was</p> <p>23 appropriate, and then she proceeded into the suite, and that</p> <p>24 was my last encounter with her during that period of time.</p> <p>25 Q And you believe that this was in December of 1996?</p>	<p>1 come directly to us. And most people acknowledge us and we</p> <p>2 acknowledge them, that everything is proper. And she did</p> <p>3 that similarly and then she proceeded into that suite and I</p> <p>4 have no recollection of anything occurring after that.</p> <p>5 Q And tell us again who is in the suite of offices</p> <p>6 that Ms. Lewinsky went into.</p> <p>7 A Well, Betty Currie, who is the President's</p> <p>8 secretary, personal secretary, and Nancy Herreich, who is</p> <p>9 the President's appointments secretary.</p> <p>10 Now, there are -- oftentimes, there are many people</p> <p>11 in these offices. They're not a very large suite of offices,</p> <p>12 but there's also a television set that's located directly</p> <p>13 through the door, so oftentimes there will be other</p> <p>14 presidential staff or workers of one nature or another that</p> <p>15 are there routinely. But as to who was in there that</p> <p>16 particular day, I couldn't venture a guess.</p> <p>17 MR. WISENBERG: Ed, do you mind if I interrupt for</p> <p>18 just a second?</p> <p>19 MR. PAGE: No.</p> <p>20 BY MR. WISENBERG:</p> <p>21 Q Let me ask you a quick question. Assume the Oval</p> <p>22 Office is a clock and there is an 11:00 door to the Oval</p> <p>23 Office. Is that correct?</p> <p>24 A From --</p> <p>25 Q Well, what I'm trying to get at is exactly where in</p>
<p>Page 18</p> <p>1 A I have thought about this at length and it's the</p> <p>2 best of my recollection. I'm sorry I can't provide you any</p> <p>3 more -- because that was not an unusual occurrence for us.</p> <p>4 That's a daily occurrence, not with just Mrs. Lewinsky, but</p> <p>5 many, many people throughout the mansion. So I have no</p> <p>6 specific recollection of the exact time that that would have</p> <p>7 taken place.</p> <p>8 Q Is it fair to say that you've thought about this</p> <p>9 since the publicity surrounding the Monica Lewinsky matter?</p> <p>10 A Yes, sir. There's no question.</p> <p>11 Q And thought about this more?</p> <p>12 A Certainly.</p> <p>13 Q And is that how you've come to date this</p> <p>14 approximately?</p> <p>15 A Until this story became public, I did not even know</p> <p>16 who Monica Lewinsky was personally. I mean, I've come to</p> <p>17 know her and quite honestly through seeing her on television</p> <p>18 and the breaking of this possibility of a story that I was</p> <p>19 able to connect that person with the two encounters that I</p> <p>20 had with Monica Lewinsky.</p> <p>21 Q Where was she headed when she and you saw each</p> <p>22 other and she passed by you?</p> <p>23 A Well, actually, she would have approached me to</p> <p>24 have made a right turn, into a small hallway, by the way,</p> <p>25 into that suite where they are located, so she would have</p>	<p>Page 20</p> <p>1 relation to -- let's say you've got Betty Currie's desk right</p> <p>2 outside of the Oval Office. You're aware of that?</p> <p>3 A Oh, I am. What position is that for you and I can</p> <p>4 go from there.</p> <p>5 Q That's outside of the 1:00 door.</p> <p>6 A That's a 1:00 door?</p> <p>7 MR. WISENBERG: Yes.</p> <p>8 Let me just show you a scheme of the White House</p> <p>9 which we've marked as Grand Jury Exhibit 1.</p> <p>10 (Grand Jury Exhibit No. 1</p> <p>11 was marked for identification.)</p> <p>12 THE WITNESS: All right, sir.</p> <p>13 MR. WISENBERG: And what I mean by 11:00, this</p> <p>14 would be 1:00, this would 11:00 --</p> <p>15 THE WITNESS: Oh, I see. You're looking at it this</p> <p>16 way.</p> <p>17 MR. WISENBERG: Okay.</p> <p>18 THE WITNESS: All right, sir.</p> <p>19 BY MR. WISENBERG:</p> <p>20 Q And I want to know just simply, you said you were</p> <p>21 outside the post. Could you mark where you were on this</p> <p>22 map?</p> <p>23 A Yes, sir.</p> <p>24 Q You can use this green pen.</p> <p>25 A This is the colonnade of the White House. This is</p>

1 the standard colonnade. These are the doors. This is the
2 door that would typically go into the suite. If you draw
3 this, this is Nancy's office, this is where Betty sits right
4 here.

5 [REDACTED]
6 [REDACTED]. So
7 she would have come down the hallway, she would had to have
8 approached us to go into this area.

9 Q Okay. You are where in relationship to Nancy
10 Herreich?

11 A Well, actually, that's not inside her office. What
12 you're going to find is the cabinet room. This is actually a
13 hallway.

14 So this comes down -- here's the oval. They're
15 going to come down this hallway, they're going to take --
16 here's the Oval Office door.

17 She's going to come to here, where the [REDACTED] post is,
18 and then into this suite of offices.

19 Q Okay. So I just want to -- the 11:00 door that
20 I've pointed out, assuming the Oval Office is a clock, this
21 would be [REDACTED] my question to you is [REDACTED]
22 [REDACTED]?

23 A I can't.

24 Q You can (sic).

25 A Yes, sir.

1 Q Right. And I guess what I'm asking you is you've
2 got -- you have an end down here?

3 A Well, Betty's office is actually here.

4 Q Okay.

5 A Nancy and Betty, they're in here together often.

6 Betty alone is primarily here. But it's almost
7 interchangeable. It's almost interchangeable for the two.

8 But Nancy Herreich primarily sits in this office, the
9 appointments secretary. Betty's desk, which is right outside
10 the Oval Office door, is primarily here, sir.

11 MR. WISENBERG: Okay. Thank very much.

12 THE WITNESS: You're welcome.

13 MR. WISENBERG: Pardon the interruption.

14 BY MR. PAGE:

15 Q I think during your past answer you said that this
16 was one of two occasions where you had some interaction with
17 Monica Lewinsky?

18 A Yes, sir.

19 Q Let's talk about the next one.

20 A All right, sir.

21 Q Tell us that one.

22 A Approximately two weeks, it could have been three
23 weeks because we don't -- there was nothing unusual about
24 this at the moment, I know that my next encounter with her
25 was on a Saturday. This will take some explaining, but I

1 Q Okay. And by the way, this is called -- it's
2 Robert Ferguson, correct?

3 A That's correct.

4 MR. PAGE: We're going to relabel this RF-1, Grand
5 Jury Exhibit RF-1.

6 (Grand Jury Exhibit No. RF-1
7 was marked for identification.)

8 BY MR. WISENBERG:

9 Q And would you agree that I have changed that to be
10 RF-1?

11 A I would.

12 MR. WISENBERG: Okay. Thank you.

13 Let me just say one other thing.

14 BY MR. WISENBERG:

15 Q This is the -- our information is that this is
16 actually a door out of the Oval Office which I've called 1:00
17 and that Betty Currie's desk would be out here and assuming
18 that that's correct, I just want to make sure that we get --

19 A Absolutely. When you come through this, down this
20 hall, what happens is you can come right through there and it
21 goes right into the oval.

22 Q Okay.

23 A The doorway into the oval. This hallway, if you
24 will, is what I'm telling you that she has to come past us to
25 come into this area.

1 think you'll get the gist of it.

2 We were in the mansion of the White House, and
3 although these two buildings, there is the West Wing -- are
4 you familiar with the layout, sir?

5 Q Somewhat.

6 A All right. This is the West Wing of the White
7 House. You go down what's called a colonnade area into
8 what is commonly referred to as the White House, which is
9 the mansion is what the terminology is called, the mansion.
10 The President and the First Family live on the second floor.

11 On this particular Saturday, the President was on
12 the second floor and as a shift, the Secret Service moves
13 with the President even within the confines of the White
14 House grounds from one location to another.

15 The presidential shift at that time, while the
16 President is in the mansion, on the second floor, takes up
17 posts so that we can defend his positions while on that floor
18 to the best of our ability.

19 When he moves down either a staircase or an
20 elevator and proceeds over into the West Wing, we will
21 precede the President, we will follow the President in
22 reasonable proximity until he arrives wherever he is going,
23 be that the West Wing, be that the Oval Office, be that the
24 Old Executive Office building, wherever within the compound
25 structure.

1 That particular morning, the President moved --
 2 came down the elevators, I do recall that, unannounced which
 3 is not untypical for anybody on a Saturday morning, and we
 4 proceeded over to the Oval Office, which, again, is not
 5 unusual for him to do.

6 That particular morning, as opposed to taking a
 7 left down the colonnade, which is the typical route the
 8 President chooses to enter the oval, which would have been
 9 the 3:00 door that you've indicated, he came down inside.
 10 Normally he does that only on the weekends, the reason being
 11 is there's no one else in that wing during that period of
 12 time. The common staff of the White House generally are
 13 greatly diminished on the weekends and so he runs into no
 14 one.

15 So he came in a different door, which would be the
 16 11:00 door that particular day. And we within that
 17 particular shift obviously know the President very well and
 18 he knows us and I had driven the President, I had been the
 19 limousine driver with our transportation section for two
 20 years, so the President, he may not know everything there is
 21 to know about you, but he certainly knows you enough to speak
 22 to you and to say something to you.

23 And what was unusual that particular day is that
 24 the President was in a good mood and he was coming into the
 25 oval and I happened to have been asked to go to the post

1 A time later, being it could have been 10 minutes,
 2 it could have been 15, within that length of time, the
 3 door as you show it, which we call it the door to the
 4 Oval Office, the post, the President opened the door and
 5 he says, "I'm expecting some staffers." I believe that is
 6 close to correct. And he says, "Let me know when they
 7 arrive."

8 I said, "Yes, sir." And the door closed.

9 For me, maybe not other agents, but this is
 10 unusual, that he would ask us directly, but you have to
 11 realize that as far as we were concerned that this was
 12 an unannounced movement, that his staff, being Mrs. Currie,
 13 his secretary, and Nancy Herrreich were not there, they were
 14 off, I would assume. It was a Saturday.

15 And I guess he was expecting -- you know, we don't
 16 know he's expecting, quite honestly, but it was a short
 17 time later and obviously my posting,
 18
 19
 20
 21

22 When a lady who I did not know came to the Oval
 23 Office door and made the comment, "The President needs me."
 24 And I knocked on the Oval Office door, I told the President
 25 that his appointment was there and he -- I think he nodded or

1 which is known as
 2 Now, is the post that you may or may not have
 3 heard of before. That is a post that is held by the agents
 4
 5
 6

7 So I took up that post. I was in a down position,
 8 which means I was in a Secret Service room, which is below
 9 the Oval Office. Its approximate size, it's similar to the
 10 size of this room here which has a lot of other security
 11 measures inside it, but it actually has some couches and
 12 things of that nature where we can actually take some down
 13 time, you know, without standing all the time.

14 So when we heard the traffic, I moved, being a
 15 shift member, I moved to the Oval Office door. And the
 16 President in fact instead of going down the colonnade did
 17 come in that door.

18 And he made the comment to me, he says, he says,
 19 "Ferg," he says, "Did you get a haircut?"

20 And I says, "No, sir. Mr. President."

21 And he goes, "Oh." And what he meant was is
 22 that obviously the bald spot on the top of my head is
 23 getting larger and that was his way of kidding with me.
 24 So he went on into the oval at that time and he closed
 25 the door.

1 he made some affirmative gesture to me to realize that that
 2 was proper. I let the lady into the Oval Office. I then
 3 closed the door.

4 And that was the last -- while on that post,
 5 that had any indication or -- there was nothing awry, in
 6 other words. I mean, there was no reason for us to feel
 7 that there was anything strange that had occurred.

8 I mean, staffers on Saturdays or any other times
 9 when he has meetings, certainly we're not privy to all of the
 10 interworkings of what occurs in a presidency, so there are
 11 other times that the President in fact has other staffers or
 12 people that we don't know in fact he would be meeting with
 13 for one reason or another. This one was not out of the
 14 ordinary as far as I was concerned.

15 A short time after that, I recall it -- I want
 16 to think it was December because it was cold outside, not
 17 frigid but cold, and I recall when the next agent came to
 18 replace me our next post which would have normally been a
 19 post for us called
 20
 21

22 For our shift for that particular day, that post
 23 was not held and there are -- we change them occasionally for
 24 one reason or another so that post was not being utilized at
 25 that period of time.

Page 29

1 My next post would have been what's called E-5 and
 2 the [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 When I left my [REDACTED] post, I hurriedly went down to
 7 what's called [REDACTED]. I'm giving you a lot of acronyms, but
 8 [REDACTED] the
 9 [REDACTED]
 10 [REDACTED]. I picked up an overcoat hurriedly, back up some
 11 stairs and proceeded outside to the [REDACTED]. Because I was
 12 gone for -- because I was gone for a couple of minutes, the
 13 agent who I was replacing hurriedly left to go to his next
 14 assignment, because it was very cold, and I took up the [REDACTED]
 15 position.
 16 I had heard no radio traffic in regard to
 17 presidential movements, [REDACTED]
 18 [REDACTED]. I did look into the Oval Office to see where
 19 the President -- in fact if he was still in the oval and to
 20 see his proximity there.
 21 I did see the President and I did see Mrs.
 22 Lewinsky. What I saw was the President and Mrs. Lewinsky
 23 proceeding into an area commonly referred to by the agents as
 24 the study. The door was then closed.
 25 For the remainder of that period of time that I was

Page 30

1 on that particular post, I did not see the President nor did
 2 I see Mrs. Lewinsky.
 3 I was subsequently pushed off that post in
 4 approximately 30 -- within the 30-minute time period and I
 5 don't recall this exactly, but I do recall -- I mean, what I
 6 do recall is being pushed from the post.
 7 Our next reasonable post would have been down into
 8 the [REDACTED] area where it's very warm because it's very cold out
 9 there and I am assuming at that stage that I went back down
 10 to [REDACTED], I was off my post, and I had never seen Monica
 11 Lewinsky again except when the television story came out.
 12 Q Before the last segment of your testimony you
 13 seemed to delay or hesitate for a little bit. What was that
 14 about?
 15 A I wanted to make sure that I give you the absolute
 16 accurate testimony that I can recall because I think this is
 17 tremendously important and I want there to be no doubt in my
 18 mind that I've told you everything that I know.
 19 MR. SUSANIN: Can I interrupt with a question?
 20 BY MR. SUSANIN:
 21 Q Sir, you've testified with regard to this last
 22 incident that the President -- or that you let a woman into
 23 the Oval Office on this morning before you went to the
 24 outside post. Was that woman indeed Ms. Lewinsky?
 25 A Yes, sir.

Page 31

1 BY MR. PAGE:
 2 Q Can you tell us, from the time that you saw
 3 Ms. Lewinsky enter the room until approximately the time you
 4 went off shift how much time had gone by?
 5 A I can give you a general approximation.
 6 Q All right.
 7 A Depending on the time the President came to the
 8 oval originally, and our shifting, so you understand, is that
 9 if he got there 15 minutes before the half hour itself, we
 10 would have been there 15 minutes and an agent would have
 11 taken you on the half hour so that we don't get the rotations
 12 askew.
 13 So my best recollection is that I was on [REDACTED] the
 14 first post, maybe 20 minutes, but I don't have an exact
 15 recollection of that. That's an approximation.
 16 Then it would have occurred on the half hour or the
 17 hour, whichever it would have been, and then it's very clear,
 18 because I would have -- it was less than a minute and a half
 19 to have actually gone down the stairway to grab a jacket to
 20 come back up and then to take the post and then to look into
 21 the oval.
 22 So I would have been on that post no more than 25
 23 minutes at max, so you're looking at my total time being 45
 24 minutes total. With those approximations.
 25 Q So to summarize, approximately 45 minutes, the

Page 32

1 President was with Ms. Lewinsky, in your estimation.
 2 A Well, sir, I'm not aware of any other people that
 3 were in the oval. Is there a possibility --
 4 Q Excuse me. Oval Office, correct?
 5 A Yes. I only -- well, once they entered the study
 6 area, which is private -- when I say study, there is also in
 7 that area there's a dining facility in there, there's
 8 different rooms within a separate very small suite, but the
 9 agents are -- anybody you talk to in this grand jury
 10 typically are going to say the study because that's how it's
 11 denoted to us, but in fact there are other rooms in there.
 12 So I do not know that the President actually went
 13 into his private study. He went through the door into that
 14 small suite. The door was closed and from there I do not
 15 know anything further than that.
 16 MR. PAGE: Can you mark on this diagram, RF-1, your
 17 position at [REDACTED] when you saw the President and Ms. Lewinsky
 18 together?
 19 MS. WIRTH: And, for the record, you're using a
 20 blue pen now.
 21 THE WITNESS: Yes.
 22 BY MR. PAGE:
 23 Q You're holding a blue pen, you're marking in blue,
 24 correct?
 25 A That's correct.

Page 33

1 Q And you've just underlined the position E-5,
2 correct?
3 A That's correct.
4 Q And you're putting a dot --
5 A That represents me. That would have been my view
6 into the oval through the window and the doorway.
7 Q And would you draw a line from the dot and just
8 then initial at the end of the line RF?
9 Now, this is your viewpoint from E-5 into the
10 Oval Office on this day we've been discussing where you see
11 Ms. Lewinsky and the President, correct?
12 A Correct.
13 Q How near, approximately, to them are you when you
14 see them together?
15 A Twenty feet, twenty-five feet.
16 Q Twenty to twenty-five feet?
17 A Approximately from here to that doorway, sir.
18 Q From your seat in this grand jury room to the door,
19 the exit, correct?
20 A Yes, sir. That's correct.
21 Q How long do you see them together before they leave
22 the Oval Office or the oval, in your words, and depart the
23 Oval Office?
24 A As I looked into the oval to find the presence of
25 the President, to make sure where the actual body is located,

Page 34

1 it was at that same time that I saw them proceeding into that
2 study area, so the same time. As I looked, I saw them
3 proceeding into that area.
4 Q Can you describe what they were doing?
5 A I don't recall any physical contact at all.
6 Q Well, I mean, were they walking together?
7 A Yes. Together being in close proximity, yes, sir.
8 As to who closed the door, I don't know.
9 Q Did they appear to be talking to each other?
10 A Not that I recall specifically.
11 Q Before you saw the President and Ms. Lewinsky
12 together in the Oval Office, was the President in the Oval
13 Office alone?
14 A To the best of my knowledge, the President was in
15 the oval alone.
16 Q Can there be any reason in fact that would suggest
17 that he was with anybody else other than Ms. Lewinsky?
18 In other words, did you hear any radio traffic, did
19 you have any personal observations yourself?
20 Did anybody else tell you he's in there with
21 someone or is expecting someone else?
22 A I was the first person to that post prior to the
23 arrival of the President and in doing so, every agent will
24 open the Oval Office door.
25 It's unusual to come through that door to begin

Page 35

1 with, which is a solid door, so we would open it, we would
2 look inside, and then we would normally leave that door open
3 so that when he comes in that he can either leave it open or
4 close it behind him.
5 Q Did you do that?
6 A I did.
7 Q When you looked in the Oval Office on this day
8 we've been talking about, was it empty?
9 A Yes.
10 Q No other person was in the Oval Office on this day
11 that we've been talking about when you looked in to see.
12 A Yes, that's correct.
13 Q And no one entered before the President entered,
14 correct?
15 A That's correct.
16 Q And no one other than Ms. Lewinsky entered after
17 she entered, correct?
18 A Not while I was on that post, sir.
19 BY MR. BITTMAN:
20 Q When you noticed her pass the first time --
21 A Yes, sir.
22 Q Was that an intern pass or a full-time pass?
23 A I've thought and thought about that, trying to
24 recall, and I do not recall. But it's not -- in our normal
25 course of business, it would not be reasonable for us to have

Page 36

1 ever allowed her into that area without one of the two, but I
2 do not recall specifically which pass she had on.
3 Q The second occasion that you're now describing, was
4 there a uniformed division officer also in your proximity
5 when Ms. Lewinsky entered?
6 A Proximity, sir? The normal course is that the
7 uniformed division officer will hold the agent post [REDACTED]
8 outside the oval only during those times that the President
9 is not in proximity. In other words, in that area. They are
10 delegated to different postings and move from that area.
11 That agent or officer generally moves to a post called [REDACTED]
12 [REDACTED] is a post which is down a hallway between the
13 oval and the Vice President's office, well down a hallway
14 from the oval.
15 Q That specific incident.
16 A Right.
17 Q The President came outside and told you he was
18 expecting someone or some people.
19 A Yes, sir.
20 Q Was there a uniformed division person there as far
21 as you can recall?
22 A Not that I recall.
23 Q Do you know Officer Lou Fox?
24 A Yes, sir.
25 Q Was he there?

Page 37

1 A Not that I recall.
 2 Q And so no one was there that you recall.
 3 A No, sir. The reasonable course would be there
 4 would have been an officer there. Oftentimes, they will move
 5 ahead of his arrival which is the appropriate thing to do.
 6 Some stand there as long as they can and as he arrives, but
 7 quite honestly, because he was not at the [redacted] my reasonable
 8 expectation would have been that he would have been at the
 9 [redacted] But do I recall specifically a person, no, sir. I
 10 don't.
 11 Q The President told you he was expecting someone or
 12 some people. When Ms. Lewinsky arrived, did she appear to be
 13 the person that he was expecting?
 14 A Yes. No one else during my period on that post
 15 arrived. She was the first. His acknowledgment of her to me
 16 would have suggested to me reasonably that that was who he
 17 was expecting.
 18 Q And when you say she was in the Oval Office with
 19 the President for 45 minutes, it was at least 45 minutes in
 20 that she entered, you were there outside the Oval Office and
 21 then you switched posts to outside, saw them in the Oval
 22 Office and then saw them move to the study area or into the
 23 study, actually, I guess, right?
 24 A Well, not to mince words, but my positive testimony
 25 is, sir, that I did let her into the Oval Office when I came

Page 39

1 change. But for this circumstance, we did not find there to
 2 be a protective problem with where he was located.
 3 Q And they were in behind that closed door for the 30
 4 minutes that you were on that post.
 5 A To the best of my knowledge, that's correct.
 6 Q Had they left that area, you would likely have been
 7 notified. Isn't that correct?
 8 A Would I have been notified if -- if the President
 9 had left the confines of that oval suite, yes, we would know.
 10 Q And you were not so notified. Is that correct?
 11 A That's correct.
 12 MR. BITTMAN: I'm sorry, Ed.
 13 BY MR. PAGE:
 14 Q With this pen, Mr. Ferguson, can you mark the
 15 study, the area where you saw the President and Monica
 16 Lewinsky go to when they left the Oval Office?
 17 A Yes, sir.
 18 Q Mark it with a dot and then draw a line off of it,
 19 please, and initial it.
 20 So they entered this area here, correct?
 21 A That's correct.
 22 Q And that's known as the study?
 23 A Agents commonly refer to that, and all of the
 24 uniformed division personnel that you will speak with, that
 25 will be commonly referred to as the presidential study.

Page 38

1 to the [redacted] post.
 2 After that, if somebody came in between the time
 3 that I was gone, did not come there between the time I was
 4 gone, I have no recollection or knowledge of. I can only
 5 testify that I did let her in at that time and that when I
 6 did look through the window and a door that I did see
 7 Mrs. Lewinsky and the President proceed into what we commonly
 8 refer to as the private study area which is adjacent to or --
 9 we call it behind the oval, but, in fact, off to the side of
 10 the oval, which is his private study area and there is also a
 11 private dining room when the President is in there and other
 12 rooms, but the fact of the matter is it was very brief.
 13 I saw them enter the doorway, the door closed and
 14 that's the last I saw them. So as far as how much time, was
 15 there anybody else in there during that period of time,
 16 there's no way I can answer. I don't know.
 17 Q Did you note to anyone that the President had moved
 18 from the oval to the study?
 19 A No, sir. We would not typically -- that is not --
 20 we would not typically do that. He is within the confines of
 21 the oval. The only time that we would mention that is during
 22 a normal day when he would have guests in, say, for a private
 23 luncheon of one nature or another or the Vice President and
 24 he had lunch in his particular private dining room, we would
 25 denote that because postings during those activities would

Page 40

1 Q Now, under your initials there, can you put in
 2 parentheses study?
 3 And under the first location on RF-1 I asked you to
 4 mark your position when you looked in the Oval Office?
 5 A Yes, sir.
 6 Q Can you put under RF in parens position outside of
 7 Oval Office? That's accurate, correct?
 8 A It is.
 9 BY MS. WIRTH:
 10 Q Could I ask you a couple of questions when you're
 11 done with that?
 12 I'm going to switch topics just for a moment.
 13 Are you aware of any other Secret Service employees who have
 14 seen Monica Lewinsky in the area of the Oval Office?
 15 A None.
 16 Q The day that you're referring to the second time
 17 that you saw Monica Lewinsky?
 18 A Yes, ma'am.
 19 Q Do you know whether the President's stewards were
 20 working that day?
 21 A They were not there. If they were working or not,
 22 I do not know.
 23 Q Do you know who replaced you at the [redacted] post that
 24 day?
 25 A No, ma'am. I don't.

Page 41

1 BY MR. PAGE:
 2 Q From your vantage point and knowledge that day that
 3 we've been discussing, was the door at the 1:00 position
 4 closed or was it open?
 5 A Closed, sir.
 6 Q Closed?
 7 A Yes, sir. It was closed.
 8 Q Did you ever see Betty Currie or Nancy Hemreich
 9 that day?
 10 A No, sir.
 11 Q In your time on the PPD, either before the event
 12 we've been talking about or after, did you ever hear from any
 13 source, any person, any rumors about Ms. Lewinsky and/or the
 14 President?
 15 A No, sir.
 16 Q None from fellow PPD member or uniformed division?
 17 A I have a longer answer, if I may. The answer is --
 18 MR. PAGE: Hang on a second.
 19 MR. WISENBERG: Go ahead.
 20 THE WITNESS: The presidential protective detail
 21 understands the importance of confidentiality in regards to
 22 what the President does or does not do.
 23 I can tell you without a doubt in my mind that any
 24 conversations in regard to that First Family that will
 25 jeopardize how close a proximity we can work jeopardizes the

Page 42

1 way that the Secret Service will do their job.
 2 Obviously a court has ruled otherwise, but I can
 3 tell you forthrightly and having been there that this will
 4 affect -- and every agent knows that this will affect the way
 5 that we can protect the President of the United States.
 6 We have sworn an oath to do that. We have done the
 7 best that we can and we realize after hearing things such as
 8 the Gennifer Flowers situation, after hearing about the Paula
 9 Jones information, that we are counselled what occurs there
 10 stays there.
 11 We know that to protect them in their private lives
 12 it is of great value. The reason being is that if we lose
 13 the confidence of the presidency, we lose the proximity and
 14 when we lose that proximity, we feel that his life is in
 15 greater jeopardy and those of the agents who protect him.
 16 So that's the long answer and I appreciate you
 17 hearing me. But the short answer is, sir, that we will not
 18 speak among ourselves, to the best of my knowledge, about
 19 anything like that.
 20 If there is something irregular or something we
 21 feel that is of a protective nature -- and that's not only
 22 physical, that's from what we call protective intelligence,
 23 if we hear or we have any information at all based on --
 24 we call it gut, but that's on your experience, that we
 25 will do something to let others in that detail know. A

Page 43

1 strange person, a strange event, something out of the
 2 ordinary. We would. But in regards to Mrs. Lewinsky, there
 3 was nothing as far as I was concerned that was out of the
 4 ordinary.
 5 I didn't even recall her specifically until I
 6 realized that the person that I saw on television was in fact
 7 the lady that I'd had those two encounters with.
 8 BY MR. PAGE:
 9 Q Speaking about television, are there monitors that
 10 would have picked this up that day? Meaning video monitors,
 11 closed circuit T.V., things like that?
 12 A I would respectfully like to take a moment in
 13 regards to -- I mean, certainly I have to answer you, sir,
 14 and I want you to know that I will do that forthrightly,
 15 but I would like the opportunity to talk to my legal counsel
 16 for just a moment in regards to that issue.
 17 Q All right. Before we go there, let me temporarily
 18 pass the question and ask you, without doing the math in your
 19 head, you're saying at a minimum the President was with
 20 Ms. Lewinsky for approximately 45 minutes during your -- from
 21 the first time you saw her until you made a shift change off
 22 of E-5.
 23 A Yes, sir. Again, it was approximately between 10
 24 and 15 minutes while on [redacted] and certainly 30 minutes during
 25 the [redacted] posting.

Page 44

1 MR. PAGE: I think we're going to, Mr. Ferguson,
 2 excuse you right now and leave that question about cameras,
 3 video, for another day.
 4 THE WITNESS: May I do this? May I provide that
 5 question to our counsel so that I can give you an accurate --
 6 MR. WISENBERG: You're free to talk, of course, to
 7 your counsel about anything that you want. We very well
 8 might have to see you again at a future time, but for today,
 9 this is all the time that we have.
 10 THE WITNESS: Understandable.
 11 MR. WISENBERG: Thank you very much.
 12 May the witness be excused?
 13 THE FOREPERSON: Yes. You are excused,
 14 Mr. Ferguson, subject to recall at a later date.
 15 MR. WISENBERG: Thank you.
 16 THE WITNESS: Thank you.
 17 (The witness was excused.)
 18 (Whereupon, at 3:40 p.m., the taking of testimony
 19 in the presence of a full quorum of the Grand Jury was
 20 concluded.)
 21 * * * * *

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.

Thursday, July 23, 1998

The testimony of ROBERT CHARLES FERGUSON was taken
in the presence of a full quorum of Grand Jury 97-5,
impaneled on December 5, 1997 commencing at 1:53 p.m. before:

EDWARD PAGE
Associate Independent Counsel
TIMOTHY SUSANIN
Associate Independent Counsel
JACKIE M. BENNETT, JR.
Deputy Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490 North
Washington, D.C. 20004

Page 3

1 PROCEEDINGS
2 Whereupon,
3 ROBERT CHARLES FERGUSON
4 was recalled as a witness and, having been previously duly
5 sworn by the Foreperson of the Grand Jury, was examined
6 further and testified as follows:
7 THE FOREPERSON: Before you sit down, sir, you were
8 sworn in to a grand jury?
9 THE WITNESS: Yes, ma'am.
10 THE FOREPERSON: About this particular matter that
11 we're hearing today?
12 THE WITNESS: Yes, ma'am, I have been.
13 THE FOREPERSON: Okay. So you understand that you
14 are still under oath?
15 THE WITNESS: I do.
16 THE FOREPERSON: Okay. Please be seated.
17 MR. PAGE: And again, let the record reflect that
18 we have a quorum and that there are no unauthorized
19 individuals in this grand jury room.
20 THE FOREPERSON: That is correct.
21 MR. PAGE: Thank you.
22 EXAMINATION
23 BY MR. PAGE:
24 Q Would you tell us your full name, please?
25 A Yes. Robert Charles Ferguson.

Page 2

CONTENTS

WITNESS:	PAGE
Robert Charles Ferguson	3
GRAND JURY EXHIBITS:	
No. RF-1 - Diagram	5
* * *	

Page 4

1 Q Mr. Ferguson, I spent a good amount of time last
2 Friday in this very room before a different grand jury
3 advising you of your rights and responsibilities, correct?
4 A Yes, sir, you did.
5 Q Do you have any questions about those in today's
6 session?
7 A No, sir, Mr. Page, I don't.
8 Q I'm not going to go over them with you, with your
9 permission, because you understood them at the time, you have
10 no questions today, and you have served in the Federal
11 service for a number of years, correct?
12 A I have, yes, sir.
13 Q So you understand your obligations and
14 responsibilities?
15 A Yes, sir. Yes, sir.
16 Q Would you please speak up --
17 A Certainly.
18 Q -- so that the woman in the far left of this room
19 could hear you, and have the benefit of your testimony.
20 Last Friday, we visited -- I should say I asked you
21 about -- several topics, correct?
22 A Yes, sir, you did.
23 Q I want to first show you what I have marked today
24 as Grand Jury Exhibit RF-1.
25 A Yes.

1 It's called [REDACTED] which stands for [REDACTED]
 2 [REDACTED] which is the Secret Service command post.
 3 which also doubles as many functions for us. But that's
 4 where we have a ready supply of other personnel that are
 5 rotating through, and also in response mode, of whatever we
 6 need to do.
 7 Above that, in the West Wing, there are other
 8 offices, to include the First Lady's office which, obviously,
 9 if she is in there as well, there would be agents on those
 10 postings, as well.
 11 Q Now, last week, when you were here testifying, you
 12 mentioned two incidents that you recall, where you saw Monica
 13 Lewinsky, correct?
 14 A Yes, sir, I did.
 15 Q I want to visit with you briefly about those two,
 16 again, to give the members of the grand jury here an overview
 17 of what you saw and testified about.
 18 A Yes, sir.
 19 Q Let's talk about the first one. Can you summarize
 20 what you saw on that occasion?
 21 A Yes, sir. The information that I can provide for
 22 you is -- is the best of my recollection. I have no hard
 23 facts, nor do I have any notations or anything other than the
 24 general memory of a person in that situation.
 25 So I can tell you this. My first -- first

1 encounter with a woman, later that I believed to be Monica
 2 Lewinsky, was in the winter, I want -- the winter of '96.
 3 And it was a normal business day.
 4 And the reason that I know it was a normal, it was
 5 Monday through Friday -- which day of the week, I don't
 6 recall -- I was on [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 That suite of offices does have a door that leads
 11 directly into the Oval Office. Therefore, the Secret Service
 12 would hold a post just outside that door, for the comings and
 13 goings.
 14 In the West Wing of the White House, after the
 15 years that we have been there, most of the staff know us and
 16 we know, at least by face, if for no other reason, most of
 17 their staff.
 18 The reason that was of note to me is because the
 19 woman I believe to Mrs. Lewinsky approached that. And I
 20 don't know specifically that I stopped her, but we would
 21 routinely stop, say "Hello," something, in order to slow
 22 them, to look at a pass that they would be wearing.
 23 I do recall allowing her to continue into Betty
 24 Currier's office, which would indicate to me that the pass was
 25 appropriate and that she proceeded into that suite of

1 offices. And, once inside there, I have no idea who she saw
 2 or what she did.
 3 Q I want to ask you some questions about the time
 4 frame.
 5 A Yes, sir.
 6 Q You earlier characterized this with, I believe,
 7 some hesitation -- correct me if I'm accurate, or inaccurate
 8 -- that this, you believed, was in the winter of 1996?
 9 A It is purely speculation on my part. I do recall
 10 it being the winter. Obviously, by the testimony I'll
 11 probably provide you later, I recall it being cold. I recall
 12 it being a regular workday.
 13 Because of that period of time, sir, it's very
 14 -- I'm giving you my best guess, in regards to the time
 15 frame.
 16 Q I'm more interested in the accuracy of the year --
 17 -- and hear me out -- rather than, I should say, the time of
 18 year.
 19 A Okay.
 20 Q I represent to you that Monica Lewinsky was working
 21 from in or about July of 1995 through in or about April of
 22 1996, at the White House.
 23 She first began, I represent to you, as an intern,
 24 in an unpaid status. And then, in or about November,
 25 December changed from a paid employee -- I'm sorry -- changed

1 to a paid employee in another office within the East Wing.
 2 If those representations are accurate, and I don't
 3 say that they are -- I don't say that they're not -- I want
 4 you to think about whether this was the winter of '95, right
 5 after the Government shutdown that you may recollect or, as
 6 you've testified, the winter of '96.
 7 Because I'll further represent to you that, in
 8 April of 1996, Monica Lewinsky was transferred to the
 9 Department of Defense and began working at the Pentagon in
 10 Virginia.
 11 Knowing that, and knowing those representations,
 12 can you tell us if that helps with you, in accurately telling
 13 us about the year you think you saw these things?
 14 A Yes, sir. I wasn't aware of any of that
 15 information at all, Mr. Page. But, quite honestly, I'm
 16 saying '96 as my best guess. Could it have been '95? The
 17 answer is also yes.
 18 Q Well, are you at the White House at the time?
 19 A At the winter of -- yes, sir, at the winter of '95,
 20 yes, sir.
 21 Q The winter of '95. So that is important,
 22 correct --
 23 A I was there. Yes, sir.
 24 [REDACTED]
 25 A Yes, sir

Page 17

Page 19

1 Q And, if she is at the Pentagon from April of 1996
2 onward, she wouldn't have a White House pass.
3 A Well, sir, let me say this, Mr. Page. I don't
4 recall a White House pass, being a permanent pass. She may
5 have, in fact, had an intern pass.

6 But as I indicated to you, I think, my testimony
7 last week is that I don't recall the pass. But I know that,
8 for me to have allowed her into that area, would have been an
9 appropriate pass, be that an intern or bet a permanent staff.
10 But I don't recall, Mr. Page, right offhand, which pass that
11 would have been.

12 I appreciate the information you provided but,
13 quite honestly, it wouldn't change my best guesstimate. But
14 I really don't recall exactly. I know it was winter, and I
15 can recall those kind of factual information, but as far as
16 the period of time, I cannot, sir.

17 Q All right. Thank you. You don't have much other
18 information about that day we've been talking about, whether
19 it's the winter of '95 or '96, other than what you've told
20 the grand jury today?

21 A That's correct, I don't. From what you and I -- I
22 mean, we talked about in the previous one, the information
23 was that I don't recall who would have taken my post or any
24 of that. I have no other recollection of who I believe to be
25 Monica Lewinsky after she went into that suite.

1 and the grand jury previously, I recall it only being a few
2 short weeks between the two, because I had never seen Mrs.
3 Lewinsky before.

4 And a few -- it wasn't -- I would say within a few
5 weeks, it was on a Saturday, and we came -- being, "we" being
6 the President and the shift of agents working that day
7 -- came from the mansion, down the colonnade, and into the
8 West Wing, through the door we normally don't go through.

9 And my assumption would be that we went that way
10 because there's nobody working. I mean, the President very
11 rarely comes inside the West Wing to enter the Oval from that
12 direction.

13 That particular day, I was leading the President
14 well up the colonnade, and I actually go through a couple of
15 sets of doors, and make sure that the Oval is prepared and
16 the doors are open, before the President, to check it, to
17 make sure that everything looks appropriate, and we step to
18 the side, and the President enters.

19 Well, as the President enters -- I have driven the
20 President, through our transportation section, for almost two
21 years, so the President knows some of the agents very well.
22 And the comment he made to me was -- and I don't know if it's
23 appropriate -- he made a comment to me.

24 He says something like, "Bob," or "Ferg," did you
25 get a haircut?" And I says, "No, sir." And the President

Page 18

Page 20

1 Q So, to summarize, you're on duty; you see Lewinsky;
2 she goes into that outer office; you don't see her come out?

3 A That's correct.

4 Q Now, you had another day that you saw Ms. Lewinsky,
5 correct?

6 A Yes, sir.

7 Q And I want to ask you some questions about that day
8 now.

9 A Yes, sir.

10 Q Are you at [REDACTED] on this day?

11 A Yes, sir.

12 Q And [REDACTED] is a position in the PPD that you have
13 indicated on RF-1, that is right outside the Oval Office;
14 correct?

15 A On the -- well, to begin that process, sir, when I
16 first, obviously, observed her -- oh, well, to answer your
17 question, yes, sir. That's much later. But, yes, sir,
18 that's correct.

19 Q So let's back up. Because before that, you were
20 actually at [REDACTED]?

21 A I was. Yes, sir.

22 Q Let's start there, and summarize, for the members
23 of the grand jury, what took place at [REDACTED]?

24 A At that particular day, I know it was Saturday, I
25 can tell you, and it was only -- I believe I told Mr. Page

1 goes. "Oh," meaning -- I think he's talking about the spot
2 getting larger all the time.

3 But, at any rate, he made the comment. And he went
4 into the Oval, and he must have closed the door. I didn't.

5 A short time thereafter, the President opens the
6 door and says, "I'm expecting" -- to the best of my
7 recollection -- "I'm expecting staffers" -- "some staffers."
8 "Yes, sir." And "Let me" -- something to the effect of, "Let
9 me know when they're here," which is unusual for me.

10 Now, this may not be unusual for others. It was
11 unusual for me. And I said, "Yes, sir." I found nothing out
12 of the ordinary. It just -- I hadn't had that occur with
13 this President.

14 So I was there for, I don't think it was a long
15 period, a short period of time. I would have only been on
16 that post, at the maximum, 30 minutes.

17 And that's when a woman I believe to be Monica
18 Lewinsky, who I recall, having never seen before, from a
19 couple of weeks, or maybe even three weeks earlier, going
20 into the west lobby. She came to the door and said, "The
21 President needs me."

22 So I knocked on the Oval Office door, at [REDACTED]
23 opened the door. The President acknowledged -- I don't
24 recall him saying anything, but I recall some acknowledgement
25 that would have made me understand that that was the person

Page 21

1 he was there to see.
 2 She went into the Oval Office, and then I closed
 3 the door. And that's the last that I had seen her during
 4 that period of time.
 5 Q Now, that was from the vantage point of [REDACTED]
 6 correct?
 7 A Yes, sir. That's an interior post at the Oval
 8 Office, on the inside of the West Wing.
 9 Q At the, some would call 11 O'clock position?
 10 A Yes, sir.
 11 Q If the Oval Office is a clock?
 12 A Yes, sir. North being, obviously 12:00, that would
 13 have been that position, yes, sir.
 14 Q Did you maintain that position?
 15 A Yes, sir. I maintained that until, we call it a
 16 push but, in fact, it's when you're relieved by another agent
 17 in your working shift of, generally, five to seven men and
 18 women. So I was relieved from that position to go to my next
 19 position.
 20 Again, the reason I recall it being a Saturday is
 21 that normally we would go from the [REDACTED]
 22 [REDACTED] to [REDACTED], which is just from here to the doorway, 20
 23 feet, 30 feet, as another observation post that would watch
 24 the comings and goings from -- into, excuse me -- into Mrs.
 25 Currie's office, which would be another entrance into the

Page 22

1 Oval, which we would want to have view of.
 2 Well, we were not holding [REDACTED] post, and the reason
 3 we did not is because Mrs. Currie's office and all the others
 4 were closed that day, and would have been locked. So that
 5 -- and from the [REDACTED] is a very good vantage point to see all
 6 the way down the hallway. So there was no reason for us to
 7 hold [REDACTED].
 8 Our next post normally, in a normal course of
 9 business, if I would have left, would have been to go outside
 10 the complex to the Rose Garden, and go to what is called [REDACTED],
 11 or [REDACTED].
 12 That particular day, we did not hold the [REDACTED] post.
 13 And postings change, depending on what's happening. We
 14 -- that particular day, we did not, on that particular shift,
 15 we did not hold the [REDACTED] post. There could be a myriad of
 16 reasons we didn't, but we did not.
 17 So I went right from our [REDACTED] position to what is
 18 commonly referred to as [REDACTED] or [REDACTED], which is the post just
 19 outside the Oval.
 20 I recall it being a winter day because, when I left
 21 the [REDACTED] post, which was hurriedly coming over from the
 22 mansion, I did not bring my overcoat from down in -- which
 23 was located in [REDACTED], which is our operations center.
 24 As I left [REDACTED] I proceeded toward the [REDACTED] post,
 25 stopping, going down the stairs for a moment to grab an

Page 23

1 overcoat, and then hurriedly going back up the stairs and
 2 outside to the colonnade, where I relieved another agent who
 3 was already standing out there, and then he went to, would
 4 have been [REDACTED], would have been to go back down to [REDACTED].
 5 So that's -- so that states, sir, my movements.
 6 Q All right. Thank you. Now, you're at [REDACTED]. And
 7 tell the members of the grand jury what you see from that
 8 vantage point.
 9 A Because I had gone to [REDACTED], that's probably another
 10 45 seconds longer than I would have normally anticipated, I
 11 didn't -- and the agent on post is cold, and wants to come
 12 off. So there was no communication, to the best of my
 13 recollection.
 14 So I stepped further toward the Oval on the
 15 colonnade, and looked through the window door, which are
 16 glass, glass framings, into the -- yes, sir?
 17 Q Excuse me. Both windows that you've marked with a
 18 "W" are glass?
 19 A Yes, sir.
 20 Q Correct? Not tinted?
 21 A They are not tinted, to the best of my knowledge.
 22 Q You can see through, into the Oval Office?
 23 A Yes, sir.
 24 Q Correct?
 25 A Yes, sir.

Page 24

1 Q And the door, is that a solid door or a glass door?
 2 A It's glass paned.
 3 Q Glass paned?
 4 A Yes, sir.
 5 Q And you can see through that, as well, correct?
 6 A Yes, sir, that's correct.
 7 Q No curtains blocking your line of vision?
 8 A No, sir, not to obstruct your view. There are
 9 curtains, but they don't obstruct the views. They're -- I've
 10 never seen them closed.
 11 Q Go ahead. Thank you.
 12 A I stepped closer to the Oval, to look through the
 13 window quickly, to make sure that the President, in fact, was
 14 in the Oval, that there hadn't been a movement, or I didn't
 15 miss a signal on the radio of a movement of the President.
 16 As I was -- as I looked through there to find the
 17 President, I saw the President and, again, who I believe to
 18 be Monica Lewinsky going through, into what most of us refer
 19 to as the study, in fact, into a private quarters belonging
 20 to the President, which -- which houses his private dining
 21 room, there's a study, and other small rooms, into that area.
 22 As they -- as I saw them, I saw them proceed into
 23 the room, and the door closed.
 24 Q All right. I want to ask you some additional
 25 questions about what you've just testified about.

Page 25	Page 27
<p>1 A Yes, sir.</p> <p>2 Q When you say "study," I want you to look at RF-</p> <p>3 1 --</p> <p>4 A Yes, sir.</p> <p>5 Q -- and tell us what you mean by study. Because,</p> <p>6 to that side of the Oval Office, is it not true that there</p> <p>7 are a number of rooms?</p> <p>8 A Yes, sir. The Oval Office complex, we're talking</p> <p>9 about the study, there's his dining room, that's the -- and</p> <p>10 only one doorway into that area.</p> <p>11 So what I observed are the two of them actually go</p> <p>12 through that door and then, in fact, the door closed. But</p> <p>13 most of the agents and officers that will testify will say</p> <p>14 that he went into the study. If, in fact, he went into the</p> <p>15 study or not, we don't know. It's just that that's what we</p> <p>16 call the area.</p> <p>17 But he proceeded in -- the President and, I</p> <p>18 believe, Monica Lewinsky, went through that door, and then</p> <p>19 the door closed.</p> <p>20 Q All right. Now, with your pen, can you mark where,</p> <p>21 when you looked through the window and door from #-5, into</p> <p>22 the Oval Office, where you saw the President and Monica</p> <p>23 Lewinsky first, before they started on into the study?</p> <p>24 A Well, actually, they were approaching it as I</p> <p>25 looked through the window.</p>	<p>1 I had seen her picture on television, and then</p> <p>2 that's when, for me, the two clicked, if you will. That's</p> <p>3 when I recognized her as the woman I believed to have been</p> <p>4 with the President during that period of time.</p> <p>5 Q And the same woman who had been -- that you had</p> <p>6 seen earlier, approximately three weeks, you believe?</p> <p>7 A Roughly, yes, sir.</p> <p>8 Q Correct.</p> <p>9 A Yes, sir, that's correct.</p> <p>10 Q So you see picture on the television?</p> <p>11 A Yes, sir.</p> <p>12 Q "Monica Lewinsky" is either underneath it on the</p> <p>13 TV, or somebody is describing that picture as Monica</p> <p>14 Lewinsky, and you put two and two together?</p> <p>15 A Exactly. That's the woman I believed I had seen,</p> <p>16 and then three weeks later, in fact, seen her go into the</p> <p>17 -- was in the Oval.</p> <p>18 I know for a fact that that's, first of all, the</p> <p>19 woman I let into the Oval the second time. And, obviously,</p> <p>20 the one I saw going into the study area when I took the E-5</p> <p>21 post, I believe that to have -- based on the TV, I believe</p> <p>22 that to have been Monica Lewinsky.</p> <p>23 Q Now, can you give the members of the grand jury an</p> <p>24 estimate about how far they were from the door into the study</p> <p>25 when you first saw them together?</p>
<p>Page 26</p> <p>1 Q That's fine.</p> <p>2 A So they --</p> <p>3 Q Indicate that area.</p> <p>4 A Yeah. They were approximately in this area here,</p> <p>5 proceeding to the doorway, which is just a few feet away.</p> <p>6 Q All right. You've just indicated with two "Xs."</p> <p>7 correct?</p> <p>8 A Yes, sir.</p> <p>9 Q And that's the position that you saw the President</p> <p>10 and Monica Lewinsky at when you first looked through the door</p> <p>11 and/or the window, from E-5?</p> <p>12 A That's correct.</p> <p>13 Q And their backs were to you?</p> <p>14 A Yes, sir.</p> <p>15 Q And was this the same woman who had approached you</p> <p>16 before you had changed positions this day?</p> <p>17 A Yes, sir, it is.</p> <p>18 Q And you testified that you believed it to be Monica</p> <p>19 Lewinsky?</p> <p>20 A I believe it to be here, yes, sir.</p> <p>21 Q Because you had seen her, a few weeks before, come</p> <p>22 to the Oval Office?</p> <p>23 A Yes, sir. I didn't -- that was not when I came to</p> <p>24 know who she was. I still didn't know who she was until this</p> <p>25 news came out, in regard to this investigation.</p>	<p>Page 28</p> <p>1 A Five feet maybe less.</p> <p>2 Q Five feet?</p> <p>3 A Yes, sir. They were proceeding to the door, as I</p> <p>4 looked through the the Oval windows and door. They were</p> <p>5 proceeding. It's a direct line of sight.</p> <p>6 Q Is the door into the study -- I should say into the</p> <p>7 Oval Office complex; is that more accurate?</p> <p>8 A That's fine. I understand what you're talking</p> <p>9 about, sir.</p> <p>10 Q Is that door a single door?</p> <p>11 A Yes, sir, it is.</p> <p>12 Q And you know that because you've been in there</p> <p>13 before?</p> <p>14 A Many, many times.</p> <p>15 Q So you see the President and Monica Lewinsky</p> <p>16 situated as you've described, and indicated on RF-1 with the</p> <p>17 two "Xs," they both walk into the Oval Office complex?</p> <p>18 A Complex, yes, sir.</p> <p>19 Q And the door closes?</p> <p>20 A Yes, sir.</p> <p>21 Q You have a radio on at the time, correct?</p> <p>22 A Yes, sir.</p> <p>23 Q And what is the purpose of that radio?</p> <p>24 A To provide communication information in regards to</p> <p>25 protective movements throughout the complex, regarding the</p>

Page 29

Page 31

1 President and the First Family.

2 Q Is it routine practice for you to hear on the radio
3 a change in the President's location within the West Wing?

4 A Within the West Wing, yes, sir, it would be.

5 Q Give us a representative exchange that you might
6 hear on the radio.

7 A If, in fact, he moved from the Oval to the
8 Roosevelt Room, you would hear the verbiage, "Horsepower
9 Eagle Roosevelt Room," which would indicate to us,
10 "Horsepower" be the Secret Service command structure;
11 "Eagle," which is the Presidential code name, is moving to
12 the Roosevelt room.

13 And then we would change our positioning more
14 adequately for that area.

15 Q What about a change from the two "Xs" on RF-1 into
16 the Oval Office complex on that diagram?

17 A Not -- sometimes you do, sometimes you do not. The
18 reason being is that I personally feel that that is, in fact,
19 part of the Oval.

20 Q Did you make a radio transmission after seeing the
21 President and Monica Lewinsky go into that Oval Office
22 complex?

23 A I did not.

24 Q Was it appropriate to do so?

25 A I don't believe so.

1 A That's correct.

2 Q So, but to your recollection, you heard no
3 transmission, and you would have heard had there been one,
4 indicating that the President moved in, for example, to the
5 Roosevelt Room?

6 A Oh, no question.

7 Q Or any other room outside the Oval Office complex?

8 A Yes, sir. Normally, I would.

9 Q Is that accurate?

10 A Yes, sir, we would have heard the transmission.

11 And I do not recall, while I was on that post, any
12 transmission of that nature.

13 Q What about the President, now, with a guest? Does
14 the Secret Service track the movements of guests that the
15 President may be with?

16 A If they're with him.

17 Q All right. So, in other words, really, it's radio
18 transmission because of the President --

19 A Yes, sir.

20 Q -- not because of that he has a guest?

21 A Absolutely.

22 Q It happens as a result of the fact that he's with
23 somebody?

24 A Yes, sir.

25 Q So, in other words, if the President would have

Page 30

Page 31

1 Q And that's because that general quadrant of the
2 West Wing was still guarded?

3 A Oh, yes, sir.

4 Q Is that why you didn't, or was it a discretionary
5 thing for you?

6 A To the best of my understanding in how we do the
7 protective function there, I did not feel that it was
8 necessary to provide radio traffic. There is no further
9 protective interest, if you will, when he moves from this
10 area to that area. It's covered the same.

11 Q Did you hear any transmission that day, from your
12 vantage point at [REDACTED], indicating that the President had left
13 the Oval Office complex, after you saw Monica Lewinsky and
14 the President enter?

15 A Not during my period on shift. And, once I left
16 that position, I would have gone down to [REDACTED]. And I don't
17 recall any traffic indicating that she was there or not.

18 What often happens, Mr. Page, is that the President
19 will go from the Oval into the Oval Office complex many
20 times. So --

21 Q In and out?

22 A In and out, yes, sir. So we would be constantly on
23 the radio calling movements that are, in my judgment,
24 unnecessary.

25 Q Unnecessary?

1 moved, you would have heard a radio transmission, correct,
2 out of that area?

3 A I would have assumed, within that period of time.

4 There could have been traffic, sir, but I don't recall any
5 radio traffic in that regard.

6 Q Did you make any other observations of Monica
7 Lewinsky or the President that day, that we haven't discussed
8 today?

9 A No, sir. That's the last time I've ever seen her.

10 Q Except for a likeness of her on television?

11 A Yes, sir.

12 Q All right. Now, I represent to you that the
13 publicity surrounding Monica Lewinsky and President Clinton
14 began in or about January 18th or 19th of 1998.

15 And specifically, I represent to you that, on
16 January 21, 1998, a Wednesday, the Washington Post, among
17 others, published stories about this alleged relationship
18 between the two.

19 Since then, I take it that you have read stories or
20 seen press coverage, whether it's TV, radio, or otherwise,
21 about this matter?

22 A Yes, sir. I have.

23 Q And, as you've done so, you've testified earlier
24 that it came to you, your understanding, I should say, that
25 the woman you saw in there that day, as well as three weeks

Page 33

1 approximately before this, was Monica Lewinsky?
 2 A I believe it to be, sir, yes.
 3 Q Did anything else besides that come to you, that
 4 helps you recollect what you may have seen or heard during
 5 your tour of service at the White House?
 6 A Mr. Page, I have no other information or
 7 recollection about that lady I believe to be Monica Lewinsky,
 8 at all.
 9 There are, as you know, sir, many, many, many
 10 interns and staff that come through those areas. Nothing
 11 significantly ever stuck out in my mind, in regards to her,
 12 other than the two events that I've mentioned to you, sir.
 13 Q Do you have any recollection as we talk here now,
 14 without looking at records, of about who was positioned at E-
 15 8 and [REDACTED] after the shift change we've discussed?
 16 A [REDACTED] normally would be, that would have been the
 17 Uniformed Division officer that would have been moved from
 18 the Oval door a considerable way down a hallway, the reason
 19 being is that there is another exit out from this complex
 20 area, through what we commonly refer to as "the pantry."
 21 And they would position themselves for this
 22 hallway, which -- and down to the Vice President, chief of
 23 staff's office, down in this area. But they would have
 24 positioned themselves further down.
 25 I do not recall who the Uniformed Division officer

Page 34

1 was. I don't even recall that he was there. Routinely, they
 2 would be, and I have no reason to believe that he wasn't
 3 there. But I don't recall who it would have been that
 4 particular day.
 5 Q Are they on the same radio frequency as --
 6 A No. No --
 7 Q -- PPD?
 8 A No, they're not.
 9 Q They're not?
 10 A No, sir.
 11 Q They have their own?
 12 A Well, within the -- yes, they have their own. They
 13 have several. The White House complex has many different
 14 radio frequencies.
 15 The Secret Service operate -- the Presidential
 16 Detail operate off one primary frequency. The First Lady
 17 detail would operate off their frequency. The Chelsea Detail
 18 would operate off their frequency.
 19 But, obviously, in the command structure, we have
 20 everybody's, and we can, from our command structure, we can
 21 make calls to anybody, and everybody.
 22 Q Have you told anybody at any time, since making
 23 these observations, besides this grand jury, the grand jury
 24 that you spoke with Friday --
 25 A Yes, sir.

Page 35

1 Q -- and a couple of agents that came and visited
 2 with you and spoke to you about some of these events
 3 approximately a month ago?
 4 A Yes. I -- the agency came down, were as
 5 professional as they could be, but I gave them absolutely no
 6 information, because I didn't feel it proper.
 7 I think, philosophically, from the Secret Service
 8 standpoint, I understand the job to do here. On the other
 9 hand, philosophically, this is tremendously detrimental, in
 10 my opinion, on how the Secret Service is going to do their
 11 job from here on. And I know -- with that being said, I gave
 12 them absolutely no information.
 13 The only other person I've ever provided this
 14 specific information about was the Department of Justice
 15 attorney, on the night prior to my previous testimony, and
 16 the reason being is that there were some issues in regard to
 17 privileged information. But on one outside that I've ever
 18 told anything like this to.
 19 Q No friends?
 20 A No, sir.
 21 Q No buddies? Nobody knows this --
 22 A No, sir.
 23 Q -- but the people I've described?
 24 A Yes, sir.
 25 Q Is it accurate to say that part of your

Page 36

1 responsibility as a Secret Service agent is to keep secure
 2 the information that you gather from being stationed at posts
 3 like E-8, E-6, and E-5?
 4 A Yes, sir. Absolutely. We do our best to provide
 5 as much privacy, as well as security, for that family.
 6 Q While you were working at the White House, as a
 7 member of the PPD, or in any other capacity, did you ever
 8 hear any rumors about the President and Monica Lewinsky?
 9 A Only from the -- no, sir. I was from -- I was gone
 10 from those areas to the Special Services Division, or even
 11 retired by most of this, by the time I heard this. But no,
 12 not in regard to Monica Lewinsky. The only other rumors were
 13 with other litigants in other cases that I've heard from
 14 television. But no recollection of ever a conversation.
 15 As a matter of fact, I think you're going to find
 16 that the service doesn't want you to have those kind of
 17 conversations, because we understand the impact, what that
 18 causes. So information that you have in that regard, they
 19 expect you to keep to yourself.
 20 Q So other than what you've heard on TV, since 1-21-
 21 98, when the story broke --
 22 A Yes, sir.
 23 Q -- if that's accurate, and I say it is, no rumors
 24 that you heard about while you were working in any capacity
 25 at the White House?

Page 37

1 A No, sir.

2 Q Does President Clinton, in your view, based upon

3 the time that you served in the PPD at the White House, did

4 he have favorites in the Secret Service -- in other words,

5 people that he was more fond of than others -- such as,

6 perhaps, yourself?

7 A I think the President knows some of the agents who

8 have been with him longer. Therefore, he would have greater

9 familiarity with them than he would others.

10 The average agent doesn't necessarily, on -- when I

11 say "average agent," being on the Presidential Detail -- they

12 don't normally carry on long conversations with the

13 President. Quite honestly, if you're conversing with the

14 President, you're not doing your job.

15 And we have a special agent in charge of that

16 detail, who that's his job, is to interact with the

17 President.

18 We've all talked to the President on many, many

19 occasions, generally not long, in-depth conversations. It'll

20 be about one thing or another, or about an activity, or a

21 golf game, or whatever it would be.

22 In my case, not only was I on his shift, but I was

23 also in the transportation section, so I had occasion to

24 drive him personally in the limousine for two years, at

25 different stages. So -- so that's probably why he has more

Page 38

1 familiarity with me than maybe some of the others.

2 People do rotate off of that. We stay, on average,

3 on the Presidential Detail, four years so, after four years,

4 people will rotate into other assignments, and so there will

5 be new faces.

6 So he generally talks to those that he knows. But

7 as far as favorites, sir, I don't -- am not a favorite that

8 I'm aware of. And I think he goes through what our chain of

9 command would be a majority of the time, which would be the

10 special agent in charge and those directly under him.

11 Q When you were there, who were the special agents in

12 charge?

13 A Lou Merletti, who is now our director; Dave

14 Carpenter, who is, I think, over at Treasury now, I think.

15 These are all gone. Excuse me. Not Treasury, State

16 Department. I'm sorry. Those are the two. And then,

17 obviously, Brian Stafford, just before that; and now, Mr.

18 Cockell. Now, I didn't -- I did not work for Mr. Cockell in

19 that capacity.

20 Q So those people that you've just named were the

21 head of the PPD during the time that you served at the White

22 House?

23 A Yes, sir. The agents will commonly refer to that

24 as the special agent in charge, or SAC, or the detail.

25 Q I want to talk to you now about recordkeeping that

Page 39

1 the Secret Service engages in as a result of the protective

2 service they provide the President.

3 Are there such things called movement logs?

4 A Yes.

5 Q And are there Uniformed Division itineraries that

6 you're aware of?

7 A Not to my knowledge, but that doesn't mean they

8 don't exist, sir. Not to my knowledge.

9 Let me say this in regard to presidential

10 movements. Anytime he moves from the mansion, off the second

11 floor, which is their residence, within that mansion, to

12 another location -- be it anything from the state floor, a

13 floor down, on -- we normally keep records that would appear

14 on that shift log, it's called a shift log, of that shift,

15 that was actually working the President for that day.

16 Q And give the members of the grand jury a

17 representative entry, say for the day you walked the

18 President down from the mansion, doing the advance for the

19 entry into the Oval Office.

20 A Okay. It would reflect something like, "Depart

21 mansion at 9:05, arrive Oval at 9:08." And there would be no

22 other entry until he departed the Oval Office, as an example,

23 at a particular period.

24 Now, movements outside the complex become much more

25 detailed, the reason being is we have a greater security

Page 40

1 factor involved and, therefore, we keep a lot, in my

2 estimation, much more accurate records.

3 But movements within, from the mansion to the Oval,

4 I mean, they're pretty routine times, for the most part.

5 Now, would we have a record of a movement from the

6 Oval into the Roosevelt Room, which is directly adjacent? To

7 the best of my recollection, I don't think that we would

8 necessarily keep an exact record of his movement into the

9 Roosevelt Room. We would consider that to be West Wing. His

10 movements within the West Wing, I don't think we would

11 denote, particularly, rooms.

12 Q Is there a report that's made that's called a PPD

13 shift report?

14 A The shift report, yes, sir.

15 Q Are there reports or logs made called F-1 movement

16 logs?

17 A F-1, F-1 is -- yes, that's common, but the agents

18 do not keep those logs. The Uniformed Division would keep

19 that log, and that would indicate an elevator movement that

20 would go from the diplomatic -- from the ground floor up.

21 Q Are there records entitled First Family locator

22 command post logs, that you're aware of?

23 A We keep a log -- not specifically. I think, to the

24 best of my recollection of what they're looking for here is,

25 is we have what is called a locator board in our command

Page 41	Page 43
<p>1 structure and, on that, in digital form, is the exact 2 whereabouts of the President, First Lady, and Chelsea at all 3 times. 4 And, as an example, if it were the President into 5 the West Wing, it would say, "POTUS" or "Eagle, West Wing." 6 It wouldn't necessarily denote Oval Office. It may. But it 7 all depends on who puts it in. 8 Q That's a digital entry? 9 A It's a digital entry. I'm not familiar with 10 another log outside that, sir. 11 Q And then, finally, there are E-pass records, 12 correct? 13 A Yes, sir. 14 Q Are there any other records that detail the 15 movement of the President or the First Family, that we've not 16 talked about? 17 A No, sir. I think you've covered it. There are 18 logs, obviously, for each protectee, being the President, the 19 First Lady, and Chelsea, independent of one another. So each 20 of those people would have an independent movement log. 21 As an example, a shift report, if it's a First Lady 22 shift, that shift report would, in fact, be -- contained on 23 the shift report is a movement log. 24 Q Are you aware of any other Secret Service agent, 25 whether a protective detail or Uniformed Division, or any</p>	<p>1 in the grand jury room? 2 THE FOREPERSON: That is correct. 3 MR. PAGE: Thank you. 4 BY MR. PAGE: 5 Q Mr. Ferguson, several followup questions, if you 6 bear with me. 7 A Yes, sir. 8 Q First, we talked about a presidential movement log. 9 A Yes, sir. 10 Q In those records, if the President is with someone 11 at the time when he is making, or moving within the Oval 12 Office or the White House complex, is the name of the person 13 who he may be with recorded in the movement log as well? 14 A No, sir. It's strictly his movement. 15 Q Now, we asked several questions of you regarding 16 RF-1, the exhibit, correct? 17 A Yes, sir. 18 Q And specifically, the Oval Office. The door inside 19 the Oval Office into what is marked on this diagram as the 20 Oval Office complex, that door I'm pointing to here -- 21 A Yes, sir. 22 Q -- which I'm now going to mark with a "D," all 23 right? Do you see that "D" there? 24 A Yes, sir. 25 Q Is that a solid door that you can't see through, or</p>
<p>1 other person that you are aware of that has any information 2 relevant to the matters that we've been asking you about? 3 A No, sir, I -- I do not. I've never discussed 4 -- first of all, this wasn't of interest to me personally, 5 until this story broke, and I had those recollections, so I 6 would have had no reason to have had a conversation about 7 them. 8 MR. PAGE: If you give me just a minute, I may have 9 another question. 10 THE WITNESS: Yes, sir. 11 MR. PAGE: Thank you. 12 Mr. Ferguson, could you step outside for just a 13 moment? 14 THE WITNESS: Certainly. 15 MR. PAGE: Thank you. 16 (Witness excused. Witness recalled.) 17 MR. PAGE: Mr. Ferguson, you're back in front of 18 the grand jury. And is it correct that -- 19 THE FOREPERSON: And you understand you are still 20 under oath, sir? 21 THE WITNESS: I do, yes. 22 THE FOREPERSON: Okay. 23 MR. PAGE: And is it correct that we have a quorum? 24 THE FOREPERSON: We have a quorum present. 25 MR. PAGE: And no unauthorized persons are present</p>	<p>1 can you see through it because it's glass or something else? 2 A It is a solid door, yes, sir. You cannot see 3 through the door. 4 Q Does the door close automatically, or do you have 5 to pull it shut? 6 A No, sir, you would have to manually close or open 7 that door. 8 Q Can you tell us approximately the distance between 9 the surveillance position, [REDACTED] or where you were when you 10 saw the President and Monica Lewinsky approach that door into 11 the Oval Office complex? 12 A Yes, sir. I was just a few feet from the window. 13 I had actually moved past the corner, because I didn't see 14 him initially, so I moved a few feet, and that's when I 15 observed them going into that door area. 16 Because I -- he may have been approaching it, but 17 my first reaction was, I expect to view him immediately at 18 the desk, and he wasn't there, and then I moved a few more 19 feet, as I was looking, and then I saw him and who I believe 20 to be Ms. Lewinsky moving, how many feet? It was like -- 45 21 feet. That's to include the Oval Office. 22 Q Approximately 45 feet? 23 A Approximately, yes, sir. 24 Q You didn't measure by tape? 25 A No, sir.</p>

Page 45	Page 47
<p>1 Q It's an estimation?</p> <p>2 A That's correct.</p> <p>3 Q And you haven't been there in a while?</p> <p>4 A Well, I don't think it's changed. But I've never</p> <p>5 measured it across. I'm assuming. That's an approximation,</p> <p>6 sir.</p> <p>7 Q Can you tell us what time of day it was? Morning,</p> <p>8 noon?</p> <p>9 A I can give you my best guesstimate, which I believe</p> <p>10 to be late morning. The reason I say that, I do recall it</p> <p>11 being daylight. I do recall it -- yes, sir, I -- before 2</p> <p>12 O'clock. I would say late morning, my best guesstimate, for</p> <p>13 that period of time.</p> <p>14 Q I want to ask you some questions about this</p> <p>15 interior door separating the Oval Office from the Oval Office</p> <p>16 complex.</p> <p>17 Is it routine for that door to be open while the</p> <p>18 President is inside the Oval Office, or closed?</p> <p>19 A Routine. I have seen it closed more often than I</p> <p>20 have seen it open. In other words, I have seen it both ways,</p> <p>21 but the most routine way would be closed.</p> <p>22 Q You testified that you had been in that Oval Office</p> <p>23 complex, and I believe including the study, several times?</p> <p>24 A Many, many times.</p> <p>25 Q Is that pursuant to your job --</p>	<p>1 understand?</p> <p>2 Q Yes. I guess we're really asking about habit.</p> <p>3 A Normally, that door would be closed.</p> <p>4 Q With personal friends?</p> <p>5 A Yes, sir. And the reason I say that is that,</p> <p>6 unless he has gone, normally gone back into that for a</p> <p>7 reason, and had left it open, it would not normally be open.</p> <p>8 As an example, when we would bring the President</p> <p>9 over in any situation, that door would normally be closed.</p> <p>10 Q Going back to the two dates that we've been talking</p> <p>11 about, on either occasion, did Monica Lewinsky have anything</p> <p>12 with her?</p> <p>13 A Not that I recall.</p> <p>14 Q Senior agents are assigned to the PPD, correct?</p> <p>15 A That's correct.</p> <p>16 Q And where does the Secret Service get new agents</p> <p>17 from?</p> <p>18 A For that detail?</p> <p>19 Q Correct.</p> <p>20 A They would come from -- we maintained 50 what we</p> <p>21 called field offices, and within that field office, and</p> <p>22 different divisions, once they're in service seven to 10</p> <p>23 years, they would become available for a protective</p> <p>24 assignment -- Vice Presidents, former Presidents, dignitary</p> <p>25 protective divisions, a majority.</p>
<p>Page 46</p> <p>1 A Yes, sir.</p> <p>2 Q -- to check out the area in advance?</p> <p>3 A Not normally during advance. but I would be in</p> <p>4 there for one reason or another. But I've been in that area</p> <p>5 many, many times.</p> <p>6 Q All right. Give us a reason that you would be in</p> <p>7 that area.</p> <p>8 A Other security operational procedures would warrant</p> <p>9 me to be into that area occasionally. Let me say this, not</p> <p>10 when the President was in the Oval. This would be when he is</p> <p>11 removed from the Oval, not during the period of time he would</p> <p>12 be there.</p> <p>13 Q Well, first, do you know whether it is more likely</p> <p>14 that that door that we've been talking about, between the</p> <p>15 Oval Office and the Oval Office complex on this diagram, is</p> <p>16 more likely to be closed when the President has guests, or is</p> <p>17 it --</p> <p>18 A It is more likely that the door would be closed.</p> <p>19 Q When he has a guest?</p> <p>20 A I have to think. I don't -- when we say "guest,"</p> <p>21 sir, are you talking in an official capacity, friends of his?</p> <p>22 Q Let's separate them, if the answer is different.</p> <p>23 A I have had occasion, when he had personal friends,</p> <p>24 and have had an observation over the years -- now, this is</p> <p>25 not -- you mean specifically to this particular President, I</p>	<p>Page 47</p> <p>1 The Presidential Detail is generally more of a</p> <p>2 hand-picked group from within the Secret Service. It's not a</p> <p>3 position that you apply for. You're selected for that</p> <p>4 assignment.</p> <p>5 Q The Oval Office has a number of windows that look</p> <p>6 out to the grounds of the White House complex, correct?</p> <p>7 A Yes, sir.</p> <p>8 Q The study and the pantry area located within the</p> <p>9 Oval Office complex in RF-1 is more private, correct?</p> <p>10 A Yeah, that's correct.</p> <p>11 Q Than the Oval Office?</p> <p>12 A More -- yes, sir. As a matter of fact, we consider</p> <p>13 that to be the President's private study, is how we refer to</p> <p>14 it normally.</p> <p>15 Q Are there any windows from the southern wall here</p> <p>16 on the bottom of RF-1, by the study and the Oval Office</p> <p>17 complex, that look outside?</p> <p>18 A There are. You have them denoted here, 1, 2, and</p> <p>19 obviously 3, and with the doorway.</p> <p>20 Q I wanted to go back to one last issue. And that is</p> <p>21 when you believe, to the best of your recollection, this</p> <p>22 occurred, not with regard to the month, season, but with</p> <p>23 regard to the year.</p> <p>24 Is it your testimony that you're still uncertain,</p> <p>25 '95 or '96?</p>

1 A It is, sir. The -- I tried to give you my best
 2 judgment, and I just don't have a specific recollection of
 3 that.
 4 Q But you do have a recollection of Monica Lewinsky
 5 having a pass?
 6 A She would have had. She couldn't have come to that
 7 area without out. Do I specifically recall that? No. But
 8 routinely, in everything that we've ever been trained to do,
 9 particularly into those areas, we would never have allowed
 10 anyone into those areas that were not properly identified.
 11 I can never remember a situation, in the history of
 12 the service, where proper identification -- particularly into
 13 the most secure area in the world, the way we see it, most
 14 sensitive -- would be anything other than that.
 15 So one of those two passes would have been the
 16 norm. To the best of my recollection, there was nothing
 17 outside of that norm, which would indicate to me that she
 18 would have had the appropriate pass.
 19 Q And, if she lost her pass, in April of 1996 --
 20 A Okay.
 21 Q -- because she transferred from the White House to
 22 the Pentagon --
 23 A Yes, sir.
 24 Q -- it makes it almost impossible, does it not,
 25 that these observations that you've testified about occurred

1 different date because of that situation? I wouldn't have
 2 know that until you told me. It certainly could have been
 3 the occurrence. But I couldn't give you a more specific
 4 recollection.
 5 MR. PAGE: All right.
 6 A JUROR: I have one more question, if I might.
 7 Previous Presidents have had means of automatically recording
 8 conversations in the Oval Office. Does President Clinton
 9 have any means that you know of, for recording automatically
 10 or manually, conversations that occur in the Oval Office, or
 11 in that area?
 12 THE WITNESS: I'll be more than happy to address
 13 that issue, if you can -- if I could beg your -- give me two
 14 minutes. I'd like to speak to counsel in regards to that.
 15 Let me ask you this sir. When you say does the
 16 President personally have a way to record conversations -- is
 17 that correct, sir?
 18 A JUROR: I guess my question is, are there
 19 recordings of conversations that occur in the Oval Office,
 20 whoever makes them?
 21 THE WITNESS: I'll be more than happen to answer
 22 that question, but I would like your indulgence for just one
 23 minute, so that I could clear an issue with our legal
 24 counsel.
 25 Certainly, I'll answer that, but I would like a

1 eight months later, in December of 1996?
 2 A She could come in on what is called an appointment
 3 pass. But an appointment would have had to have been made.
 4 She would have had to show proper identification at the
 5 gates, be screened like anyone else coming into the Oval
 6 Office complex.
 7 That appointment would have had to have been
 8 acknowledged, and would be in what is called our WAVE center,
 9 with that appointment, because that would have -- that goes
 10 to -- now you're talking about things within the Secret
 11 Service that would have occurred.
 12 So that appointment would have been noted, and she
 13 would have been issued a red pass, or whatever color we used
 14 at the time, with an "A," which stands for appointment. Even
 15 that would have been proper credentialing. We had a specific
 16 color for the West Wing, for that period of time.
 17 So I would have been more suspect of an appointment
 18 pass, which is not a permanent pass, if you will. An intern
 19 certainly is. We have a permanent passholder, which is.
 20 We even have a "T," which stands for temporary,
 21 which is a permanent passholder who, for one reason or
 22 another, didn't bring their pass that day, left it, you know,
 23 for whatever reason. But those are people that, in fact, we
 24 know work there, that are issued by the Secret Service.
 25 Now, with that in mind, could it have been a

1 moment to do that, if you don't mind -- 30 seconds.
 2 MR. PAGE: All right.
 3 THE WITNESS: Excuse me.
 4 (Witness excused. Witness recalled.)
 5 THE FOREPERSON: We're back on record again.
 6 MR. PAGE: And with a quorum and no unauthorized
 7 people, correct?
 8 THE FOREPERSON: That is correct.
 9 MR. PAGE: Thank you.
 10 THE WITNESS: Thank you. I apologize for the time.
 11 THE DEPUTY FOREPERSON: And you are still under
 12 oath, sir.
 13 THE WITNESS: Yes, sir. To make sure I understand
 14 it correctly, your question is, does the President of the
 15 United States have the ability to manually or automatically
 16 tape conversations within the Oval Office; is that correct,
 17 sir?
 18 THE WITNESS: Yes.
 19 THE WITNESS: To the best of my knowledge, he does
 20 not.
 21 MR. PAGE: All right, Mr. Ferguson. Barring any
 22 other questions, thank you for --
 23 A JUROR: I have one. How was she dressed that
 24 day, from what you saw?
 25 THE WITNESS: I was asked that in the last grand

Page 53

1 jury, ma'am. I don't recall. I would --

2 A JUROR: Jeans, dress, what? It was an off day.
3 right?

4 THE WITNESS: Yes, ma'am. I know for a fact it was
5 a Saturday. I do recall that. But how she was -- most
6 staffers, on a weekend, do not dress as they would during the
7 business week, to include the President. He will oftentimes
8 go to the Oval, on a weekend, for hours at a time, in jeans
9 or, you know, down clothing, as we would describe it.

10 But I -- I really don't have a recollection how she
11 was dressed that day.

12 THE FOREPERSON: Does anyone else have any
13 questions?

14 (No response.)

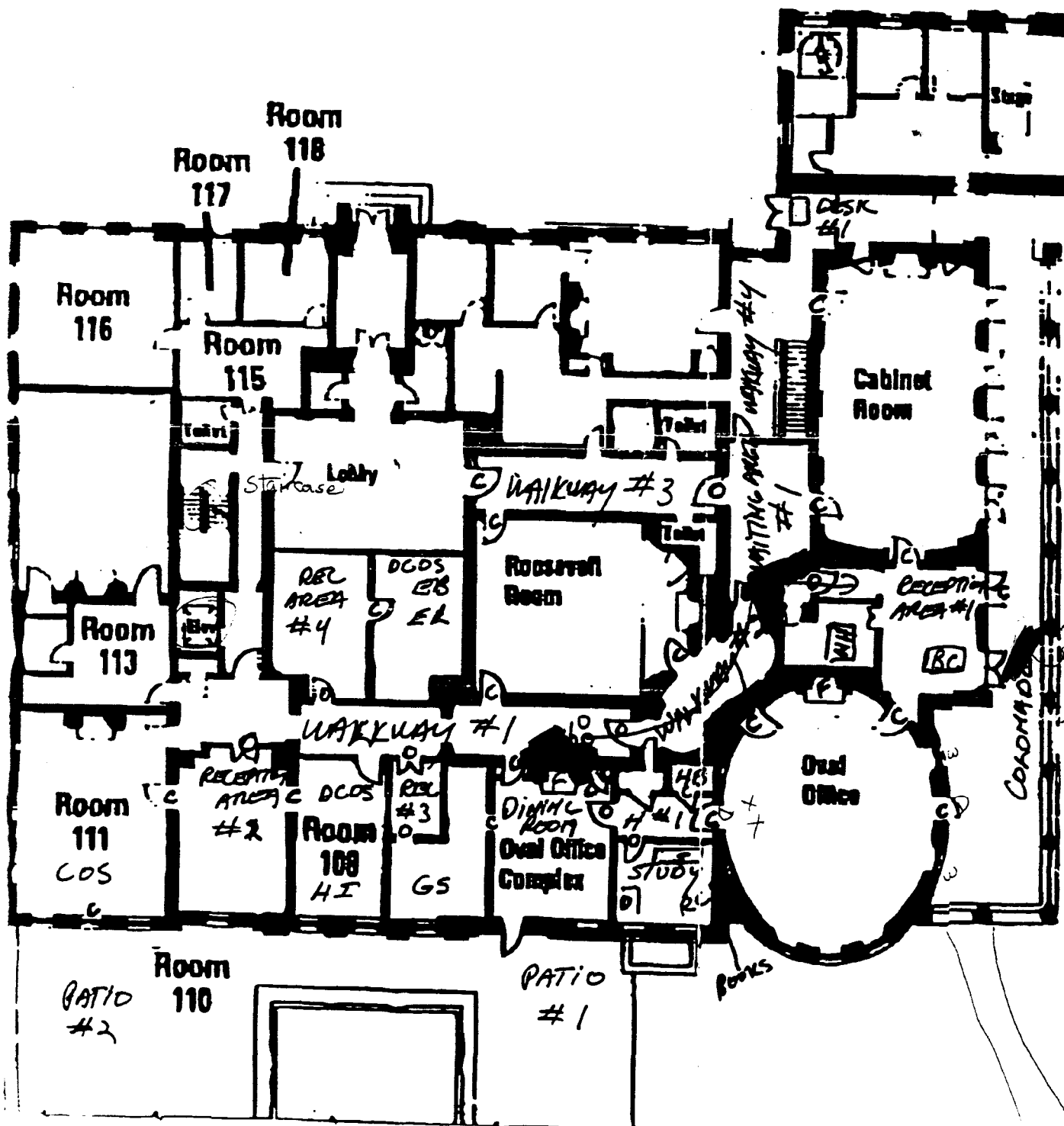
15 MR. BENNETT: We ask that he be excused.

16 THE FOREPERSON: You're excused.

17 (The witness was excused.)

18 (Whereupon, at 3:21 p.m., the taking of the
19 testimony in the presence of a full quorum of the Grand Jury
20 was concluded.)

21 * * * * *



OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/23/98

DEBRA SUSAN FINERMAN, white, female, date of birth [REDACTED], place of birth [REDACTED], Social Security Account Number [REDACTED], was apprised of the official identity of the interviewers and the nature of the interview. Also present for the interview, conducted at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, Northwest, Washington, DC, were Associate Independent Counsel MICHAEL EMMICK and FINERMAN's attorney, STEVEN D. GORDON. FINERMAN was interviewed under a cooperation agreement between FINERMAN and the OIC, a copy of which is attached to this FD-302. The information provided herein attributed to LEWINSKY is what LEWINSKY told FINERMAN. FINERMAN provided the following information:

FINERMAN is a journalist and writes for the magazine Capitol Style. FINERMAN graduated from the University of California at Los Angeles with a degree in pre-med and political science. FINERMAN works from her homes in Warrenton, Virginia and Washington, DC. FINERMAN advised she spends approximately twenty percent of her time at the family's Washington, DC residence, [REDACTED].

FINERMAN described her relationship with her niece, MONICA LEWINSKY, as being a close companionship. FINERMAN advised she speaks with LEWINSKY once every three weeks at a minimum. FINERMAN advised MONICA LEWINSKY and her mother, MARCIA LEWIS, FINERMAN's sister, are close friends. LEWINSKY would not bare her soul to her mother. FINERMAN advised LEWINSKY and LEWIS were close because they lived together. LEWIS has a key to FINERMAN's apartment.

LEWINSKY told FINERMAN about going to a birthday party for President WILLIAM JEFFERSON CLINTON on the White House lawn. LEWINSKY said that CLINTON was so nice and that LEWINSKY thought CLINTON liked her. LEWINSKY then advised that CLINTON came to a birthday party for someone in LEWINSKY's office at the White House. LEWINSKY advised that CLINTON smiled at her and that he kept looking at her. LEWINSKY was upset that a co-worker said that CLINTON never came to the offices for birthday parties, indicating the co-worker may have been aware of CLINTON's eye contact with LEWINSKY.

Investigation on 2/23/98 at Washington, DC File # 29D-OIC-LR-35063
 by SA [REDACTED]
 SA [REDACTED] Date dictated 2/23/98

29D-OIC-LR-35063

Continuation of OIC-302 of DEBRA SUSAN FINERMAN, On 2/23/98, Page 2

LEWINSKY said that EVELYN LIEBERMAN was a mean woman. LEWINSKY indicated she was reprimanded by LIEBERMAN for walking in a hallway near the Oval Office. LEWINSKY said that CLINTON would call LEWINSKY in her office and tell her to walk by his office and wave to him as she walked by. LIEBERMAN labeled LEWINSKY a stalker. LEWINSKY could not tell LIEBERMAN that CLINTON had asked her to walk by, so she was put in a bad position.

The only sexual contact FINERMAN knew of specifically between LEWINSKY and CLINTON was one incident, which LEWINSKY told her about. LEWINSKY and FINERMAN were having coffee, something they often did on Sunday mornings. FINERMAN described LEWINSKY as being excited and anxious to tell FINERMAN that she saw "him" again. In the context of this conversation and other conversations FINERMAN had with LEWINSKY, FINERMAN knew "him" to mean CLINTON. LEWINSKY said it was really weird, but they fooled around in a little room off of the Oval Office and CLINTON [REDACTED] FINERMAN responded by saying something to the effect of "yuck." Because of FINERMAN's response, LEWINSKY did not provide further details to FINERMAN of this or other sexual encounters LEWINSKY may have had with CLINTON.

FINERMAN advised she believes this conversation took place within a week of the sexual encounter described above. FINERMAN advised she believes LEWINSKY was working at the White House when this conversation took place. FINERMAN advised that LEWINSKY would go to the White House to visit CLINTON on weekends when there were fewer people there.

LEWINSKY told FINERMAN that in July of 1996, she went to the White House to visit CLINTON on a weekend. CLINTON and LEWINSKY had a long talk. CLINTON told LEWINSKY that they could not continue their physical relationship as he had to be "good." CLINTON told LEWINSKY that his advisers told him that he could not have any more "bimbo" eruptions. FINERMAN assumed that this was because of the upcoming Presidential election. LEWINSKY understood this and also thought that she would be working at the White House again after the 1996 election.

FINERMAN is familiar with a White House "butler" named NELL. LEWINSKY said that NELL would give her White House M&M

29D-OIC-LR-35063

Continuation of OIC-302 of DEBRA SUSAN FINERMAN . On 2/23/98 . Page 3

candies, Air Force One souvenirs and other trinkets. On one occasion, LEWINSKY, giggling, told FINERMAN that NELL had a "secret." LEWINSKY then explained that NELL knew about the physical relationship between CLINTON and LEWINSKY. LEWINSKY said that she and NELL would go to dinner, and remained friends after LEWINSKY left employ at the White House.

FINERMAN advised that she felt sorry for LEWINSKY because LEWINSKY did not have any friends at the White House and felt ostracized by some people at the White House. LEWINSKY was known by some as the "stalker."

FINERMAN advised that MARCIA LEWIS knew about LEWINSKY's relationship with CLINTON. FINERMAN told LEWIS about the physical relationship. LEWIS may not have known the details before FINERMAN told her, but she knew LEWINSKY was emotionally involved with CLINTON. FINERMAN believes LEWIS understood the physical nature of the relationship. LEWIS knew about BETTY CURRIE's relationship with LEWINSKY.

LEWINSKY told FINERMAN that LINDA TRIPP said TRIPP knew CLINTON. LEWINSKY said TRIPP told her that TRIPP was psychic and a witch. LEWINSKY said that TRIPP advised that LEWINSKY's relationship with CLINTON was different than any of CLINTON's other relationships. FINERMAN advised that LEWINSKY was not into sorcery.

FINERMAN advised that LEWINSKY was very careful about mentioning anything about the White House when in public. LEWINSKY said she told some friends in Los Angeles about her relationship with CLINTON. FINERMAN has met ASHLEY RAINES. LEWINSKY told RAINES about her relationship with CLINTON. RAINES did not approve of LEWINSKY's relationship with CLINTON, but still remained LEWINSKY's friend. LEWINSKY's friend KATHRYN (phonetic) Last Name Unknown (LNU) also knew about LEWINSKY's relationship with CLINTON.

FINERMAN advised that WALTER KAYE and his wife, SELMA KAYE, visited Los Angeles a lot. Approximately twelve years ago, MARCIA LEWIS's friend, ALISE SPILKER, introduced LEWIS and FINERMAN to WALTER KAYE. LEWIS, FINERMAN and WALTER KAYE became friends and social acquaintances.

29D-OIC-LR-35063

Continuation of OIC-302 of DEBRA SUSAN FINERMAN, On 2/23/98, Page 4

KAYE may have guessed about CLINTON's relationship with LEWINSKY. KAYE would make comments about CLINTON's habit of flirting with women. KAYE was friends with people in the White House who did not like LEWINSKY.

WALTER KAYE's grandson served as a White House intern at one time. FINERMAN asked WALTER KAYE to put in a good word for LEWINSKY during her application process to become a White House intern. WALTER KAYE has a lot of friends at the White House.

Sometime after LEWINSKY left employ at the White House, LEWINSKY received telephone calls from CLINTON at her home late at night. FINERMAN believes the telephone calls occurred in January or February of 1997. LEWINSKY did not explain what was discussed during the telephone conversations. FINERMAN has never heard answering machine tapes with CLINTON's voice on them. CLINTON would call from his bedroom when HILLARY CLINTON was not around.

In February of 1997, KAYE hosted a party in New York for CLINTON. LEWINSKY expressed an interest in going and asked FINERMAN if she could get LEWINSKY tickets. FINERMAN asked KAYE, who responded that FINERMAN's niece was very pushy. FINERMAN retorted that it was CLINTON telephoning LEWINSKY late at night, not the other way around. KAYE appeared shocked.

KAYE is friendly with DEBBI SCHIFF and MARSHA SCOTT, two people LEWINSKY said were ex-girlfriends of CLINTON's. FINERMAN has never heard the term "graduate" used to describe an ex-girlfriend of CLINTON's. LEWINSKY told FINERMAN that SCHIFF has been transferred to the State Department.

LEWINSKY was told she was transferred out of the White HOUSE because the personnel allotment of her office was being restructured. LEWINSKY told FINERMAN this was the only reason for the transfer. FINERMAN believes LEWINSKY did not connect the rumors about her being a stalker to her transfer. FINERMAN does not know if KAYE had anything to do with LEWINSKY getting a job at the Pentagon.

29D-OIC-LR-35063

Continuation of OIC-302 of DEBRA SUSAN FINERMAN , On 2/23/98 , Page 5

LEWINSKY was sad to leave the White House. LEWINSKY liked her job at the Pentagon, but the hours were long and there was a lot of travel. LEWINSKY was not suited for her position at the Pentagon.

CLINTON told LEWINSKY she would return to employment at the White House after the 1996 Presidential Election. CLINTON told LEWINSKY that SCOTT would help LEWINSKY find a job at the White House. LEWINSKY had an interview with MARSHA SCOTT at the White House in 1997. SCOTT told LEWINSKY there were no jobs available at the White House.

In June of 1997, MARCIA LEWIS moved to New York City. LEWINSKY decided she would move to New York as well. FINERMAN believes CLINTON arranged an interview for LEWINSKY at the United Nations. LEWINSKY felt the United Nations' position was too much like her job at the Pentagon.

FINERMAN found out in November of 1997, that LEWINSKY was leaving her job at the Pentagon.

FINERMAN and LEWIS were walking down Fifth Avenue in New York City when LEWIS said that LEWINSKY had a meeting with VERNON JORDAN. FINERMAN was aware of two meetings LEWINSKY had at JORDAN's office. One meeting was a breakfast meeting, the other was during lunch. FINERMAN is aware that LEWINSKY had other interviews. Until LEWINSKY got a job offer, FINERMAN was concerned that CLINTON would just dump LEWINSKY. FINERMAN was aware of LEWINSKY's interviews at AMERICAN EXPRESS and REVLON, though FINERMAN was not familiar with the name MCANDREWS & FORBES. LEWINSKY told FINERMAN about her job offer from REVLON, and LEWINSKY appeared to be happy about it.

WALTER KAYE had told FINERMAN and LEWIS that all the telephones in Washington, DC were tapped. FINERMAN advised that LEWIS came up with the code name "GWEN" when referring to JORDAN during telephone conversations.

The only conversations FINERMAN recalls about the PAULA JONES lawsuit was related to LEWIS's, LEWINSKY's and FINERMAN's opinions. FINERMAN thought JONES' suit had merit; LEWIS thought it did not, and LEWINSKY thought CLINTON should settle it.

29D-OIC-LR-35063

Continuation of OIC-302 of DEBRA SUSAN FINERMAN . On 2/23/98 . Page 6

FINERMAN may have heard LEWINSKY mention KATHLEEN WILLEY's name. FINERMAN did not understand the story about WILLEY and CLINTON.

FINERMAN advised that she knew LEWINSKY had to go to something court related a week before LEWINSKY went, and knows LEWINSKY had to sign something, but FINERMAN was not aware it had anything to do with the PAULA JONES lawsuit. FINERMAN did not know anything about a witness list. FINERMAN knew LEWINSKY had to see a lawyer named FRANK CARTER. FINERMAN did not know of the relationship between CARTER and JORDAN. FINERMAN is not aware of the fee arrangements between LEWINSKY and CARTER.

FINERMAN only knows of one meeting between CARTER and LEWINSKY, but is aware of several telephone calls between the two.

FINERMAN did not see LEWINSKY often in late December of 1997. In January 1998, FINERMAN was with LEWIS in New York when LEWINSKY called to ask LEWIS to come to Washington because the Federal Bureau of Investigation (FBI) wanted to talk to LEWINSKY. LEWIS told FINERMAN that she did not want FINERMAN to know why LEWINSKY was meeting with the FBI. When their train arrived in Washington, DC, FINERMAN went to her apartment at the Watergate.

The following day, LEWIS told FINERMAN about TRIPP taping TRIPP's telephone conversations with LEWINSKY.

After January 16, 1998, FINERMAN did not talk to LEWINSKY or LEWIS about LEWINSKY's relationship with CLINTON. LEWIS did not want to testify before the grand jury. FINERMAN was not aware that LEWIS was asked to be interviewed by the OIC.

FINERMAN is not familiar with the names BOB NASH or ERSKINE BOWLES. FINERMAN knew that LEWINSKY was friends with BETTY CURRIE. FINERMAN remembers when CURRIE's brother was killed, LEWINSKY sent balloons. LEWINSKY said she would call CURRIE to see when LEWINSKY could visit CLINTON.

FINERMAN saw a hat pin CLINTON gave LEWINSKY, which FINERMAN believes was in 1996. FINERMAN also remembers some "junky souvenir" items CLINTON gave LEWINSKY in the summer of

29D-OIC-LR-35063

Continuation of OIC-302 of DEBRA SUSAN FINERMAN . On 2/23/98 . Page 7

1997. Included in that was a canvass bag with the logo of the "Black Dog" (a "tourist place") on it, a beige cotton shirt and a t-shirt with the "Black Dog" on it. FINERMAN saw a hard cover version of "The Leaves of Grass," which LEWINSKY said CLINTON gave her. FINERMAN did not see an inscription in the book. When LEWINSKY worked at the White House, LEWINSKY showed FINERMAN a cigar that LEWINSKY said belonged to CLINTON.

FINERMAN is aware of LEWINSKY giving CLINTON some ties. FINERMAN has read the book titled "Vox", and knows it is about telephone sex, but does not know the book in relation to CLINTON. FINERMAN is not aware of a compact disc CLINTON gave LEWINSKY. FINERMAN remembers LEWINSKY buying a book in Annapolis, Maryland, and giving it to CLINTON for his birthday. LEWINSKY gave CLINTON a ceramic frog. FINERMAN is not aware of LEWINSKY giving CLINTON an audio or video cassette.

In 1997, LEWINSKY took out a "personal" advertisement for Valentine's Day in the Washington Post, and directed it to CLINTON. LEWINSKY told CLINTON about the advertisement.

FINERMAN is not aware of a dress of LEWINSKY's with a stain on it. LEWINSKY referred to CLINTON as the "creep" the "big creep" and "Bubba." FINERMAN does not recall LEWINSKY referring to CLINTON as "handsome."

Someone at the White House made a derisive comment about MARCIA LEWIS's book "The Three Tenors" being a "kiss and tell" book. LEWIS said she was going to send a copy of the book to the White House and FINERMAN may have suggested sending a copy of the review of the book in the New York Times Book Review.

FINERMAN is not aware of any notes or cards exchanged between CLINTON and LEWINSKY. FINERMAN did not hear of an incident involving CLINTON and LEWINSKY in the White House movie theater. LEWINSKY did tell FINERMAN about the time CLINTON invited LEWINSKY to watch a movie with CLINTON and others in the theater, but LEWINSKY turned the offer down because she did not think it was a good idea. LEWINSKY was still working at the White House at the time.

29D-OIC-LR-35063

Continuation of OIC-302 of DEBRA SUSAN FINERMAN . On 2/23/98 . Page 8

FINERMAN advised she does not know when LEWINSKY and CLINTON's physical relationship began. FINERMAN does not recall any conversations about what CLINTON and LEWINSKY would say if they got caught together. FINERMAN is not aware of any codenames used by LEWINSKY. LEWINSKY recently began using a pager.

Debra Finerman, 3/18/98

OIC Deposition

Page 2 to Page

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004
Phone: 202-514-8688
FAX: 202-514-8802

Page 2

OFFICE OF THE INDEPENDENT COUNSEL
 DEPOSITION OF : Wednesday, March 18, 1998
 DEBRA FINERMAN : Washington, D. C.
 Deposition of
 DEBRA FINERMAN
 before the Independent Counsel, held in the Conference Room
 of the Office of the Independent Counsel, in Suite 400-North,
 1001 Pennsylvania Avenue, N. W., Washington, D. C. 20004,
 beginning at 3:14 p.m., when were present:
 For the Independent Counsel:
 MICHAEL EMMICK, ESQUIRE
 Associate Independent Counsel
 BRUCE UDOLF, ESQUIRE
 Associate Independent Counsel
 STEPHEN BINHAK, ESQUIRE
 Associate Independent Counsel
 Court Reporter: Elizabeth A. Eastman

Page 5

obligation that you have. At the beginning of this
 deposition you were placed under oath by the court reporter.
 Because you are testifying under oath, that means that if you
 were to make an intentional false statement, that could
 expose you to a prosecution for perjury. Perjury is a
 federal felony and it has a five-year maximum sentence.
 Do you understand what perjury is and what it means
 to be under oath?
 A Yes.
 Q Are there any questions that you have about any of
 those rights or obligations as I've described them to you?
 A No.
 Q What I would like to do is just make a couple of
 matters clear on somewhat of an informal basis. What I mean
 by that is, we are going to be talking about some things that
 may be somewhat difficult for you. You are here with a court
 reporter whom you don't know. You've met me on one prior
 occasion, I believe.
 But I just wanted to say, bear with us if some of
 the subject matter is more explicit than you might ordinarily
 like to talk about publicly.
 A (Witness nodded indicating an affirmative
 response.)
 Q That is the introductory material that I would like
 to have gone over with you before we get started. Unless you

Page 3

PROCEEDINGS
 WHEREUPON,
 DEBRA FINERMAN
 having been called for examination by the Office of the
 Independent Counsel, and having been first duly sworn by the
 notary, was examined and testified as follows:
 EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL
 BY MR. EMMICK:
 Q Would you state and spell your name for us?
 A Debra Finerman, D-E-B-R-A, F-I-N-E-R-M-A-N.
 Q What I would like to start with, Ms. Finerman, is
 to explain to you certain rights and obligations that you
 have as a witness in a deposition of this type.
 The first right that I would like to explain to you
 is your right to consult with an attorney in the course of
 the deposition. Let me first ask you, do you have an
 attorney?
 A Yes, I do.
 Q Who is that?
 A Steve Gordon.
 Q Is he somewhere in the vicinity?
 A Yes. He is outside this room.
 Q So, you understand that if you feel a need to
 consult with him with regard to any of the questions that I
 ask, you can simply say, I wonder if we could stop for a

Page 6

have any questions, we'll jump right in and ask questions on
 the subject matter.
 A Okay.
 Q What I would like to ask first is for you to
 describe your familial relationship with Marcia Lewis and
 with Monica Lewinsky.
 A Marcia Lewis is my sister and Monica Lewinsky is my
 niece.
 Q Let me ask you to describe more colloquially and
 more in an informal fashion what kind of a relationship you
 have with Monica Lewinsky.
 A Well, I've known Monica since the day she was born
 and I'm very fond of her.
 Q Do you have a relationship with her that you would
 describe as a close relationship?
 A Yes.
 Q Let's direct your attention to, say, the last three
 years, that is, from 1995 or so. Have you had frequent
 conversations with Monica Lewinsky?
 A Yes.
 Q And have some of those conversations been in
 person?
 A Yes.
 Q And some by telephone, I take it?
 A Hmm, yes, some of them.

Page 4

minute while I consult with my attorney?
 A Yes.
 Q All right. Second, as a general matter, you, like
 all witnesses, have a Fifth Amendment right to refuse to
 answer any questions that might tend to incriminate you.
 Now, in this case, your attorney and I have discussed and
 agreed upon what is called transactional immunity for you.
 Are you aware of those discussions?
 A Yes.
 Q All right.
 (Deposition Exhibit DF 1 was
 marked for identification.)
 BY MR. EMMICK:
 Q I have in my hand a three-page document that we
 have labeled as DF 1. Just so that you know, that means
 Debra Finerman #1. It is a copy of what is called
 Cooperation/Immunity Agreement, Debra Finerman. Do you
 recognize that?
 A Yes.
 Q That is a document that describes the immunity that
 you have and, on the flip side of that, describes the
 cooperation that you have agreed to give in exchange for that
 immunity. Is that correct?
 A Yes.
 Q All right. Next, let me describe for you an

Page 7

Q About how often would you say you have met with
 Monica Lewinsky? Is there a way that you can give us some
 average, or some ballpark about how often you meet with her?
 A Varying, dependent upon circumstances. Within that
 time, maybe not weekly, maybe twice a month on the average.
 Q Fine. And when you mentioned earlier that you have
 what you describe as a close relationship with Ms. Lewinsky,
 would you tell us what you mean by a close relationship?
 A Yes. We go out to movies together sometimes and
 sometimes we go out for coffee and family events.
 Q And do you sometimes talk about somewhat personal
 matters with her?
 A Yes.
 Q When you have those discussions of personal
 matters, are they generally with just you and Ms. Lewinsky?
 A Yes, sure.
 Q We will get into more detail about that in just a
 moment. Would you describe for us the relationship that
 Monica Lewinsky has with her mother, your sister?
 A Sure. She lives with her mother, although they
 didn't intend it to be that way permanently. But when she
 first moved here to Washington she moved in with her mother,
 thinking she would then meet kids her age and she would get
 roommates and move out. But that didn't happen.
 Q That would have been in 1995?

Page 8

A Right. That didn't happen. So, she has stayed with her mother. And her -- what was the question, is she close with her mother?

Q Or just describe her relationship. My followup question would have been, how close are they.

A Right. I think that they are close, as a mother and daughter usually are.

Q Are there differences in the kind of relationship that you have with Monica than the kind of relationship that Monica has with her mother?

A Hmm. Sure. I don't discipline Monica as her mother would. I don't pay for her things. I'm more, I guess, closer in age to her; not a contemporary, but I think that she feels that I am closer in age maybe.

Q Would you regard yourself as more of a confidante, if you will?

A Yes.

Q What do you mean by that?

A Well, I think in a way Monica might think that she could tell me things that I would want to hear, that maybe her mother wouldn't be interested in.

Q Okay. Let me turn your attention then to the third relationship there, and that is your relationship with your sister.

A Uh-huh.

Page 9

Q Would you describe that relationship?

A Very close, professionally and in our family.

Q What do you mean by professionally?

A We've always worked together. We are writers and we are partners writing, and we've always been. Well, always, meaning from when we started our writing career.

Q And personally close. Can you explain what you mean by that?

A Sure. Our father passed away when we were little girls. And when you have a father who passes away, it brings you closer to your siblings. So, she and I have always been close in terms of her looking out for me. I'm seven years younger. And in that way, we have always maybe relied on each other more than other siblings.

Q Does she sometimes talk with you about Monica?

A Sure.

Q And the problems that a mother might encounter with a daughter, for example?

A Yes.

Q What I would like to turn my attention to next is a discussion of what you know of Monica's relationship with President Clinton.

A Okay.

Q What I would like to do is start off with a few particular incidents and then proceed from there.

Page 10

A Okay.

Q Let me ask you first if you know anything about a birthday party that was thrown for President Clinton where Monica made some comments to you about that birthday party?

A Yes.

Q Would you tell us about that, and I will ask followup questions to clarify things.

A Okay. As I recall, when she first became an intern, I think she was invited, along with all the whole staff, to a birthday party for President Clinton, which I think must have been in August. And I think that's where they first maybe met.

Well, anyway, she told me that she first met him and that he seemed attracted to her or interested in her or something. And in sort of an immature way, she said, oh, he's so cute and I think he looked at me, and that sort of thing.

Q Now, is this something that she told you shortly after the birthday party?

A Probably, yes.

Q And at the time, did you think anything unusual about that?

A No, not -- well, I don't know. I wasn't sure whether it was her imagination or he -- I had heard that he often looks at women in crowds. So, I didn't think much of

Page 11

it. It didn't mean a lot to me.

Q Let me then direct your attention to another incident, if you will, in fact, another birthday party that Monica may have described to you of a coworker with Monica. Do you remember the incident I am speaking of?

A Yes, I do.

Q Would you tell us what you recall Monica saying about that incident?

A Okay. This was later. I think she was still an intern. I don't think she was -- I'm not sure whether she was an employee or an intern. But there was a coworker of hers who was having a birthday party. And this was -- these are low-level people in the White House.

And she told me that President Clinton had come by to say hello, or somehow wish this person a happy birthday, which was very unusual. And the other people who worked in that office commented on it and said something like, wow, look, the President came.

And she commented to me -- I think that was the time that she said, I think he came to see me and he was looking at me and he was making it very obvious.

Q And did that distress her as she was describing it to you, or did it make her happy? What was her reaction as she was describing this incident?

A I remember clearly that she thought this was either

Page 12

inappropriate of him or would make other people notice, and that would be not a good thing.

Q Over the course of your conversations with Ms. Lewinsky, did you come to know that she used some nicknames to describe President Clinton?

A Well, I've read about it. So.

Q Did you hear from her though? I am going to be focusing here on what things she told you prior to all of this hitting the news, if you will.

A She may have said Big Creep, but that was much later.

Q That was later?

A Much later.

Q And when you say much later, can you give us a best estimate of when you started hearing her describe him that way?

A I think she jokingly referred to him that way after she had already moved to the Pentagon. So, that would be months later.

Q And did she give any indication how she had come up with that name, or why she wanted to refer to him as the Big Creep?

A I think she was mad at him or disaffected or something like that.

Q Now let me ask you about gifts that you know of

Page 13

that Monica received from President Clinton.

A Okay. She showed me a hatpin.

Q Can you describe it at all?

A Yes. Well, it was kind of round, about that big (indicating), and gold, and it may have had some enamel on it. And then there's a long thin part to it. That's how I remember it.

Q How is it that you came to see this hatpin?

A She showed me. She said, look, look, I got a present. She was all excited.

Q Now, when she said she got a present, how is it that you connected the present with President Clinton?

A Oh, she said, the President gave me this.

Q Can you tell us where you were in order to see the hatpin? Was this at her apartment or --

A Her apartment.

Q Can you tell us when this happened?

A Oh, boy. I think it was sometime during the summer, a summer. Or I can't really say. I just remember that she used it and put it in a straw hat, which makes me think it was some warm time of year, either spring or summer.

Q Can you tell us whether it would have been '95 or '96 or '97? And just to help you bracket those times, '95 would have been the summer during which she started as an intern, '96 would have been the time when she had been at the

Page 14

[1] Pentagon for only a couple of months; and '97 would have been
 [2] eight months or so ago.
 [3] A I can guess. I'm sorry.
 [4] Q Guessing is probably not the best practice. But if
 [5] you can give us your best estimate or your best belief,
 [6] having in mind that you don't have much certainty.
 [7] A Okay. '96.
 [8] Q What other gifts from President Clinton do you know
 [9] about?
 [10] A Okay. I know about a bunch of touristy things from
 [11] Martha's Vineyard, from Black Dog. I don't know whether it's
 [12] a tavern or a hotel or something. And there was a T-shirt
 [13] and a kind of cotton dress, sleeveless, long cotton dress.
 [14] And I think some kind of a bag, like a canvas bag. And, what
 [15] else?
 [16] Okay. Then I also saw --
 [17] Q Before we leave that topic, can you tell us under
 [18] what circumstances you saw these items? And naturally I'll
 [19] ask you when or what is your best estimate of the time you
 [20] saw it.
 [21] A Okay. She showed me them in her apartment. And
 [22] when? The summer, this summer.
 [23] Q This summer?
 [24] A Right.
 [25] Q This would have been '97 then?

Page 17

[1] been working at the White House. Then after that, she would
 [2] have been at the Pentagon.
 [3] A It was during the time she was working there. So
 [4] around that time.
 [5] Q The White House?
 [6] A Right, the White House.
 [7] Q How did she say she had obtained this cigar from
 [8] the President?
 [9] A Hmm. She didn't tell me.
 [10] Q Okay. What did she say about the cigar? She just
 [11] said, I have this cigar from the President?
 [12] A She said, look, look, I have this cigar. He gave
 [13] it to her.
 [14] Q Okay.
 [15] A I know that. But I don't know what circumstances.
 [16] Q Was it a cigar that would be in a cigar tube, for
 [17] example?
 [18] A No. It was not in a tube. It was just there. It
 [19] was just a cigar.
 [20] Q Was it in plastic packaging at all?
 [21] A No, I don't think so.
 [22] Q Do you remember if it had a cigar band or any
 [23] little paper --
 [24] A I don't remember. No. But I know it was not in a
 [25] package.

Page 15

[1] A Yes.
 [2] Q And when she showed them to you, what did she say
 [3] about them?
 [4] A She said, look, I got some presents from the
 [5] President. And she showed them to me and she was happy. And
 [6] I must tell you, I was surprised that a man could pick out a
 [7] dress, such a perfect size of a dress, which made me think, I
 [8] wondered whether maybe some aide, some woman had picked out
 [9] these things for him to give her, because it's very hard to
 [10] choose someone's size so accurately.
 [11] Q Okay. Did she say anything more about those
 [12] presents as she showed them to you?
 [13] A No, I don't think so.
 [14] Q You were about to mention some other items?
 [15] A Right. And then he gave her a book, the Leaves of
 [16] Grass, or whatever it is, leaves-of-something book.
 [17] Q When did you come to know about that?
 [18] A I think it was around the same time.
 [19] Q The same time, being the summer of '97?
 [20] A Summer of '97.
 [21] Q How did you come to know about that? Did she show
 [22] it to you?
 [23] A She showed it to me.
 [24] Q What did she say as she showed it to you?
 [25] A She said, oh, look at this beautiful book that the

Page 18

[1] Q Okay. When you started to describe under what
 [2] circumstances she showed you the cigar, you sort of made a
 [3] giggling-type motion with your hand and your mouth. Did she
 [4] seem to be giggling about it at all?
 [5] A Oh, yes. She's always like that. She's always all
 [6] excited and, look, look what I have, look what he gave me, oh
 [7] boy, that sort of attitude.
 [8] Q All right. Well, let's talk about any gifts you
 [9] know that she gave to President Clinton.
 [10] A Okay. I know she gave him some ties. And I know
 [11] she gave him a book. That's recently. I think that was this
 [12] summer for his birthday.
 [13] Q All right. Let's go back to the ties.
 [14] A Okay.
 [15] Q And take it a bit at a time.
 [16] A Okay, sure.
 [17] Q How many ties do you think she may have given him
 [18] A I think two.
 [19] Q And how do you know that she gave him these ties?
 [20] A Because she would say something like, I'm watching
 [21] him on TV today and he's wearing my tie. Or, I watched him
 [22] on TV, he's wearing my tie.
 [23] Q When would she have then given him these ties, wha
 [24] timeframe?
 [25] A I think during the time she worked there and then

Page 16

[1] President gave me.
 [2] Q And did she say why the President had given her
 [3] either the book or the other items?
 [4] A No.
 [5] Q What other items that were gifts?
 [6] A I don't think there is anything else.
 [7] Q Let me ask you about one item that I think you
 [8] mentioned as we were discussing these items a couple of weeks
 [9] ago. You indicated during that initial interview -- proffer-
 [10] interview, I believe we have been calling it -- that she had
 [11] a cigar that --
 [12] A Oh, right.
 [13] Q -- the President had given her.
 [14] A Yes.
 [15] Q Can you tell us how you came to know about that?
 [16] A Yes. Again, sometime she said to me, look, look, I
 [17] have a cigar, his cigar. And it was, I think it wasn't
 [18] smoked. It was just a cigar. And she had it in her room and
 [19] she showed it to me. But that was earlier than all of this.
 [20] Q Then let's try to clarify the time as best we can.
 [21] A Okay.
 [22] Q The cigar time would have been approximately when?
 [23] Again, I can help bracket the time by indicating that she was
 [24] an intern during the summer of '95 until about November. And
 [25] then from November of '95 until April of '96, she would have

Page 19

[1] maybe when she was at the Pentagon. So, it may have been
 [2] more than two. I don't know.
 [3] Q Can you describe the ties at all?
 [4] A No. I don't know.
 [5] Q You started to mention a book that she had
 [6] purchased perhaps last summer?
 [7] A Right.
 [8] Q Tell us about that.
 [9] A She bought him -- she happened to be in Annapolis,
 [10] and she knew that he liked books about sailing or the Navy or
 [11] something. So, she bought him a book as a birthday present.
 [12] Q Do you know what the book was?
 [13] A No. Something to do with sailing or ships, or
 [14] something like that.
 [15] Q How did you come to know about this?
 [16] A She told me.
 [17] Q Did she say that she had made a special trip to
 [18] Annapolis? Or what were the circumstances under which she
 [19] bought this book?
 [20] A I don't know. I don't think -- I don't know.
 [21] Either she was there or something. For some reason she was
 [22] in Annapolis.
 [23] Q When you say she bought the book, did she
 [24] specifically say she bought it for the President?
 [25] A Yes.

Page 20

[1] Q Did she say how she had given the book to the
 [2] President?
 [3] A No.
 [4] Q Did you ask her anything about how she plans to
 [5] give the book to the President, anything like that?
 [6] A No.
 [7] Q Okay. What about any other gifts from her?
 [8] A To him?
 [9] Q Yes.
 [10] A Oh, she bought him some little things, like a frog,
 [11] or a little frog doll or something, because she said he likes
 [12] frogs.
 [13] Q A frog doll. When you say a frog doll, do you mean
 [14] like a fabric kind of a frog, or do you mean a ceramic frog?
 [15] A I didn't see it. I don't know what it was. Some
 [16] kind of a figure of a frog. I don't know if it was ceramic
 [17] or a stuffed animal or what.
 [18] Q And how did she describe to you the fact that she
 [19] had given him a frog of some kind? How did this come up?
 [20] A She probably said something like, I saw such a cute
 [21] frog doll, so I got it for the President because he likes
 [22] frogs. Something like that.
 [23] Q When did this conversation occur, or when did she
 [24] give him this frog?
 [25] A I don't know. I'm guessing during the time that

Page 21

[1] she worked at the Pentagon.
 [2] Q Okay.
 [3] A But I don't know exactly.
 [4] Q She would have been working at the Pentagon from
 [5] April of '96 all the way until the very, very end of '97.
 [6] So, that's a long period of time. Can you bracket it a bit
 [7] more?
 [8] A I'm sorry. I can't. It's just so insignificant.
 [9] Q Okay. Any other gifts that you can think of?
 [10] A That's all I can remember.
 [11] Q Let me ask you about a book by the name of Vox.
 [12] A Okay.
 [13] Q Are you familiar with that book?
 [14] A Uh-huh.
 [15] Q What is the book Vox about?
 [16] A It's a long book, I think about one phone
 [17] conversation.
 [18] Q Okay.
 [19] A I read it. I don't remember it that clearly.
 [20] Q Have you talked with Monica about that book?
 [21] A No, not really.
 [22] Q Is it a book that you own?
 [23] A I read it. I don't think I have it any more.
 [24] Q All right. I next want to ask you about anything
 [25] you know about a Valentine's Day ad --

Page 22

[1] A Yes.
 [2] Q -- that Ms. Lewinsky may have placed in The
 [3] Washington Post.
 [4] A Yes, I do.
 [5] Q What can you tell us about that?
 [6] A That she did place an ad and it was made out to
 [7] Handsome, which I guess was her nickname for him or
 [8] something, one of them. And she did place it in The
 [9] Washington Post. And she told me that she had told him about
 [10] it, or showed it to him. I don't know which. And he liked
 [11] it very much.
 [12] Q Did she say what year she was talking about, '97 or
 [13] '96?
 [14] A I'm going to guess '96.
 [15] Q I can help you out.
 [16] A Yes. This is -- wait now. I don't know.
 [17] Q Last year would have been '97.
 [18] A Right.
 [19] Q Let me show you a document that we obtained. We
 [20] will mark this as DF 2.
 [21] (Deposition Exhibit DF 2 was
 [22] marked for identification.)
 [23] BY MR. EMMICK:
 [24] Q This is a two-page document that says on the front,
 [25] Fax Transmission, From Debra Finerman, For Mrs. Marcia Lewis,

Page 23

[1] and there is attached to it a page of Valentine's Day ads.
 [2] You can see at the top it has a date indicated.
 [3] What I would like you to do is take a look at
 [4] these. You might want to look at both pages, because I will
 [5] ask you some questions about both.
 [6] Do you recognize that?
 [7] A Yes. That's my writing. Where's the ad for him?
 [8] Oh, there it is. Oh, okay. Oh, yeah, okay. Yes, I know
 [9] what this is.
 [10] Q Okay.
 [11] A Okay. I know what this is.
 [12] Q Do you see on the second page there is an ad there
 [13] for Handsome?
 [14] A Right.
 [15] Q And at the bottom of that ad, it says simply M.
 [16] A Right.
 [17] Q Did you know anything about that ad going into the
 [18] paper before it went into the paper? In other words, did you
 [19] know about the planning of it at all?
 [20] A I suppose I did.
 [21] Q Okay. In what way? What do you mean?
 [22] A I guess Monica told me she was going to place the
 [23] ad. Yeah.
 [24] Q All right. What about that first page that has Fax
 [25] Transmission and --

Page 24

[1] A What's this?
 [2] Q I don't know. Why don't you tell us what that
 [3] means? I think you indicated that that was your handwriting.
 [4] There is a reference to "Amount: 5099.00." Do you know what
 [5] that refers to?
 [6] A No, I don't. I know that I must have -- Monica
 [7] must have asked me to fax her a copy of this ad, that I had
 [8] it and she hadn't seen it or something.
 [9] Q And Marcia hadn't seen it? Marcia, being your
 [10] sister?
 [11] A I don't think Marcia -- yes. I don't think she was
 [12] there. Well, anyway, I don't know. I have this feeling --
 [13] well, this is because it's Marcia's apartment. So, I'm not
 [14] sure I faxed it to Marcia. I'm sure it was Monica who said,
 [15] fax it to me.
 [16] Q All right.
 [17] A And probably because it's Marcia's apartment. I
 [18] think. See, I don't remember exactly.
 [19] Q What is the reference to 5099?
 [20] A I have no idea. Really, I seriously don't know. I
 [21] don't know.
 [22] Q And as you sit here, are you certain that you were
 [23] sending this to Monica rather than to Marcia, even though it
 [24] says for Marcia?
 [25] A Hmm. No, I'm not certain. I'm sorry. I'm not.

Page 25

[1] Q What fax machines would you have been sending this
 [2] to?
 [3] A The Watergate, I think, the office. You have to
 [4] put the resident's name on it.
 [5] Q All right. And at whose request were you sending
 [6] this, as best you can recall?
 [7] A I thought Monica, but maybe not, because I don't
 [8] know what this is.
 [9] Q When you say "this", you are pointing to the amount
 [10] 5099.00?
 [11] A I mean this amount. I don't know what that is.
 [12] Unless Marcia may have said, would you check my -- why,
 [13] though? Wait, let me try to think. This could have been
 [14] Marcia's balance, okay, in her checking account.
 [15] Q I see.
 [16] A Why would Marcia ask me to do that? I'm sorry. I
 [17] don't know. It's nothing important to you, I'm sure. I
 [18] don't know.
 [19] Q All right. That's fine.
 [20] A I'm sorry.
 [21] Q There is a date indicated up at the top of the
 [22] first page, and I believe it's repeated on the second page.
 [23] The date appears to be February 15th, 1997.
 [24] A Hmm, okay.
 [25] Q Does that look accurate to you?

Page 26

1 A Yes.
 2 Q It looks like it says 10:29 a.m., and I guess that
 3 would be the day after Valentine's Day?
 4 A Right.
 5 Q Did Monica at any time talk with you about any
 6 phone calls that she got from President Clinton?
 7 A Yes, she did.
 8 Q Can you tell us about those conversations with
 9 Monica and what she said about the phone calls?
 10 A Yes. She used to get phone calls in the middle of
 11 the night. And, for example, if I talked to her at work, she
 12 would say, oh, I'm so tired, because the President called me
 13 at two in the morning, or three in the morning, and I was so
 14 excited I couldn't go back to sleep.
 15 And then I guess, I think I told you in the
 16 interview, my reaction was, he called you from the White
 17 House? I mean, to me, this was just crazy. And she said,
 18 yes. And I thought, or I may have said to her, isn't that,
 19 won't somebody hear this, won't he be caught calling you in
 20 the middle of the night? And I don't remember her response,
 21 but something to the effect of, no, it's okay.
 22 Q All right.
 23 A That was shocking to me. I couldn't believe that.
 24 Q Do you remember during what periods of time she was
 25 getting these calls, or at least telling you that she was

Page 29

1 A That's all she said. I think when I -- that is
 2 when I said, how could that be, how could he call you, from
 3 where, how could he do that. It seemed to me that somebody
 4 would be listening or his phone calls would be monitored
 5 somehow. So, she said that he called from the bedroom, which
 6 I think is in the residence.
 7 Q Did you discuss at all the fact that the
 8 President's wife, Hillary Clinton, might have been around?
 9 A No. I assumed she was not.
 10 Q All right. You don't recall discussing that with
 11 Monica at all?
 12 A Well, I don't think. I think I assumed. I may
 13 have said, was -- I mean, obviously, she wouldn't be sitting
 14 there. No.
 15 Q All right. What I want to turn to next is some
 16 questions about the sexual nature of the relationship between
 17 President Clinton and Monica Lewinsky.
 18 A Okay.
 19 Q At some point, did you come to believe that the
 20 relationship between President Clinton and Monica Lewinsky
 21 was sexual?
 22 A At one point she told me about an incident that
 23 happened.
 24 Q Let me turn right to that incident.
 25 A Okay.

Page 27

1 getting these calls?
 2 A I think it was while she was still working there.
 3 And it may have continued until after she was at the
 4 Pentagon.
 5 Q One of the things that you indicated when we spoke
 6 during our proffer-interview was that you thought that at
 7 least some of the calls might have been in January or
 8 February of 1997. Is that consistent with your recollection
 9 now, or is it a bit different from your recollection now?
 10 A This is after the election, right?
 11 Q The election would have been November of '96.
 12 A Right. I don't think so.
 13 Q You think it was earlier than January and February
 14 of '97?
 15 A Yes, I think so.
 16 Q Okay.
 17 A Oh, yes, I'm sure.
 18 Q Now, do you mean to say that it started earlier
 19 than that and --
 20 A Yes.
 21 Q -- it was --
 22 A Yes.
 23 Q Can you tell me your best estimate of the time when
 24 these telephone calls started, or when you first heard of
 25 them?

Page 30

1 Q And then we will ask questions on either side of
 2 that incident.
 3 A Okay.
 4 Q First, as best you can, give us the date when this
 5 discussion took place.
 6 A Hmm. Well, all I know is that I think it was when
 7 she was working there. So, I would guess it's in the winter
 8 of '95. I can't say exactly. Or it could have been January
 9 '96. It would be in that timeframe. I think.
 10 Q Where were the two of you when you had this
 11 discussion?
 12 A We were at Starbuck's on Connecticut Avenue.
 13 Q Just the two of you?
 14 A Yes.
 15 Q Tell us what the two of you talked about on that
 16 subject.
 17 A Well, she had been telling me that she went to
 18 visit the President sometimes, or when she was working there
 19 she would go into the Oval Office sometimes. And I didn't
 20 know what, you know, what for, what, did they have
 21 discussions or was it work-related.
 22 And then this particular time she told me about an
 23 incident where she said that he -- I guess they had been
 24 somehow getting physical. And she said that he did something
 25 odd. And so, when I said, what, she said that he

Page 28

1 A I think they started when she still worked there
 2 until a little bit after the Pentagon, she went to the
 3 Pentagon.
 4 Q All right.
 5 A So, that would have been '95 to early '96.
 6 Q Although actually she started at the Pentagon in
 7 April of '96.
 8 A Right.
 9 Q Did she at some point simply stop telling you about
 10 any phone calls? Or what is the basis for your bracketing
 11 the time?
 12 A Right. I stopped hearing about them.
 13 Q About how many of these phone calls did Monica talk
 14 about?
 15 A Five maybe.
 16 Q What did she say about what the President said
 17 during those phone calls?
 18 A Hmm. She didn't tell me.
 19 Q Did she say anything about who else might be
 20 around? For example --
 21 A In the White House?
 22 Q Right.
 23 A No, because I think he was calling her from -- one
 24 time I know he called her from his bedroom.
 25 Q What did Monica say about that?

Page 31

1 [REDACTED]
 2 Q All right. Can you give us more context as to how
 3 this came up? For example, did she say why she was there?
 4 A Hmm. Honestly, I don't remember anything but that
 5 part, because it was sort of strange. And she also, the way
 6 she said it was, she said, Debbie, I have to tell you
 7 something so weird. And so I said, what. And she told me
 8 that. And I didn't ask any more questions, because that was
 9 kind of, that was weird.
 10 Q Right. When you were describing it just now, I
 11 thought you said something like they were involved in
 12 something sexual?
 13 A Physical.
 14 Q Physical.
 15 A Yeah, something physical.
 16 Q Can you remember what her words were when she
 17 described that? Did she use the words "fooling around", or
 18 did she use some other way of describing what they were
 19 doing?
 20 A Fooling around? Maybe. I'm sorry. I don't
 21 honestly remember. She could have said that. Maybe she said
 22 fooling around.
 23 Q But you don't remember what her words her?
 24 A She didn't say that to me. I don't remember that.
 25 Q The idea that was conveyed to you was, what?

Page 32

[1] A Oh, well, I do remember that I said, in the Oval
[2] Office? And she said, no, in this little office next to the
[3] Oval Office. I think I told you at the interview where I was
[4] very surprised that anything that personal could be going on
[5] with all those windows. And then she told me, no, it's off
[6] this little office.
[7] And until recently, I didn't quite understand where
[8] the sink was, but apparently there's a bathroom. Right? Off
[9] that little office. So, I suppose that's where it was.
[10] Q All right. But that's not based on anything you
[11] learned from her during this conversation?
[12] A No.
[13] Q That's --
[14] A Right.
[15] Q -- reconstructing it --
[16] A Yes.
[17] Q -- with recent news. All right. And what was your
[18] reaction when she described this incident?
[19] A Well, not shock, but kind of dismay, or negative. A
[20] negative reaction.
[21] Q And did you express that to her?
[22] A Yes, I did.
[23] Q Now, prior to this discussion with her, had you
[24] come to believe that there was possibly or probably a sexual
[25] relationship between the two of them?

Page 33

[1] A Well, I knew that there was kissing involved.
[2] Q Okay. How do you know that there was kissing
[3] involved?
[4] A She told me.
[5] Q Okay. What did she say about there being kissing
[6] involved?
[7] A She -- well, see, I have to be careful. I don't
[8] know whether I remember this or I think I remember it. She
[9] must have said, oh, he kissed me; or, he's a good kisser; or
[10] something like that. And I don't remember exactly, but I'm
[11] just thinking I must have known somehow.
[12] Q Was anyone else present while she was discussing
[13] this with you?
[14] A No.
[15] Q And what is your reaction when she says that the
[16] President is kissing her, or is a good kisser, or words to
[17] that effect?
[18] A By then, I understood that there is something going
[19] on here.
[20] Q Now, would her descriptions of kissing the
[21] President, would that have been before or after, let's call
[22] this, the sink incident or the sink discussion? Would that
[23] have been before?
[24] A (No response.)
[25] Q Or do you remember?

Page 34

[1] A I don't remember. I imagine so. But I don't know.
[2] Q Well, when I started asking you some questions
[3] shortly after the sink incident, I asked you, prior to the
[4] sink incident, was there anything that led you to believe
[5] that Monica might be having some sort of a physical
[6] relationship with the President, and you then started talking
[7] about the kissing discussions.
[8] A Right.
[9] Q As you sit here now, do you think the kissing
[10] discussions between you and Monica were before or after the
[11] sink discussion, for lack of a better word?
[12] A Hmm.
[13] Q You just don't know?
[14] A (Witness shook her head indicating a negative
[15] response.)
[16] Q How many times did you and Monica discuss the
[17] subject of the President kissing her?
[18] A Maybe three times. I don't know.
[19] Q That sounds to me like it's an estimate?
[20] A I mean, I -- right. I had an idea that something
[21] was going on here. Yeah.
[22] Q And the discussions about him kissing her, was that
[23] part of the basis for what you concluded?
[24] A Yes.
[25] Q Can you give us any more detail at all about what

Page 35

[1] Monica said about the President and her kissing one another?
[2] A No. I think that's it. Except I think when she
[3] told me about the sink thing, she probably thought that I
[4] would want to hear more details. But when I showed that it
[5] was something I didn't want to talk about, that was it. Then
[6] she sort of clammed up.
[7] Q Right. Other than describing the kissing
[8] incidents, and describing the sink incident, were there any
[9] other discussions of any physical contact with the President?
[10] A No. Not that I remember.
[11] Q All right. Were there any discussions between the
[12] two of you about any times when others came close to catching
[13] them in some sort of physical contact?
[14] A Not exactly in that context, but I know she told me
[15] that Nel, who is a steward or a butler, either knew or
[16] somehow was a confidante of hers. I don't know whether he
[17] actually saw or he sort of figured out. Or somehow he knew
[18] that something was going on between them.
[19] Q When did you learn about Nel and what Nel knew?
[20] A She showed me some playing cards from Air Force
[21] One. And I said, oh, you've been on Air Force One? And she
[22] said, no, Nel got them for me. And so, of course, I said,
[23] who's Nel. I thought it was a woman. She said, it's -- she
[24] explained who he was, and that's her friend.
[25] Q When would that conversation have taken place,

Page 36

[1] while she was at the White House, or would it have been
[2] sometime while she was at the Pentagon?
[3] A I'll guess the Pentagon. I don't know exactly.
[4] Q Can you pick the time any more accurately than at
[5] the Pentagon? Would it, for example, have been in '96 or
[6] '97?
[7] A Hmm. Oh, boy. I really don't know. I'm sorry. I
[8] can't.
[9] Q Based on your conversations with Monica, can you
[10] tell us who else Monica may have told about her physical
[11] relationship with the President?
[12] A Linda Tripp.
[13] Q All right. And what did she say about what she had
[14] told to Linda Tripp?
[15] A Well, when she first started working at the
[16] Pentagon, she had met Linda Tripp who, I guess, worked there,
[17] too, somewhere nearby. And she told me she had met this
[18] woman. And over the course of a few months, she mentioned
[19] her and she said some strange things about this woman, which
[20] I didn't understand why they would be friends with each
[21] other. She was much older. She had children almost Monica's
[22] age.
[23] And she told Monica that she was a witch and she
[24] had psychic powers. And she told Monica that she had this
[25] feeling that President Clinton felt very special about

Page 37

[1] Monica. And Monica, this was different. She told Monica,
[2] this is different from all the other women he's ever had. He
[3] really must be in love with you.
[4] Q And that is what led you to know that Monica had
[5] told Linda about the physical relationship?
[6] A Yes.
[7] Q All right. Who else did Monica tell about the
[8] physical relationship with the President?
[9] A I don't know.
[10] Q Do you know whether she told Ashley Raines?
[11] A No. I don't know how much Ashley Raines knows.
[12] Q What about with a woman named Kathleen?
[13] A Kathleen Willey?
[14] Q No, another friend of hers.
[15] A Catherine?
[16] Q Maybe Catherine, I'm sorry.
[17] A Okay, Catherine.
[18] Q Yes, Catherine.
[19] A I don't know what she told Catherine.
[20] Q I'm sorry. I had the pronunciation wrong and the
[21] spelling as well.
[22] A I'm sorry. I don't know what she told her.
[23] Q All right. Do you know whether she may have told
[24] some friends in LA about the physical relationship?
[25] A No, but then you brought somebody from there,

Page 38

Page 41

Neysa.
 Q Right. But I'm --
 A So, no, I'm sorry.
 Q -- asking you what you knew from Monica.
 A No, I don't know. I don't know what she told anybody. She's told lots of people.
 Q So, as far as you knew, she had told Linda, and you knew that Nel knew?
 A Right.
 Q And you knew that she had other friends, but you weren't sure whether she had told those friends about the physical relationship?
 A Right. Well, I was very surprised if she did, because I think I mentioned to you at the interview, if we were out somewhere in public, and I said anything about anybody at the White House, she'd say, shh, don't talk about that. Not even anything to do with President Clinton. So, it seemed like she was so discreet. That's why I don't understand this. This is bizarre.
 Q Did she say anything about how the meetings with the President were arranged? For example, what times or what days they were arranged?
 A She would say things like, I get to go there today. That's what she would say. So.
 Q Did she say any particular days that were better

[1] an intern from the summer of '95 until November of '95. Then
 [2] she worked at the White House itself from November of '95
 [3] until April of '96.
 [4] A Okay.
 [5] Q Is there some way that you can describe the
 [6] evolution, if you will, of Marcia's reaction to all of this?
 [7] A Well, this whole thing started pretty slowly. In
 [8] other words, something like, wow, he keeps looking at me.
 [9] blah, blah, blah. You know, I wasn't there when she talked
 [10] to Marcia. So, I don't know what she told Marcia.
 [11] Q Right.
 [12] A But I can tell you from what I knew this thing sort
 [13] of snowballed. And it got Marcia sort of neutral, I guess,
 [14] until suddenly it became obvious this was something beyond
 [15] just an infatuation. And especially when Monica said, other
 [16] people at the White House hate me; they are calling me a
 [17] stalker.
 [18] And the way Marcia thought of it, as a mother, was
 [19] now my daughter is not making any friends. All these people
 [20] hate her because of this thing. And I don't even know if she
 [21] knew if it was physical or not at that point, except there
 [22] was something going on, and it was impacting negatively on
 [23] Monica.
 [24] Q Did you have discussions with Marcia about all of
 [25] this?

Page 39

Page 42

for her to go there? For example, on a weekend or a particular day during the week?
 A Yes. I think she said weekends she might get to go because there were fewer people around.
 Q All right. Do you remember approximately when she said that?
 A Hmm. Somewhere in there. I don't know.
 Q Somewhere, like --
 Q While she was working at the White House, or would it have been while she was at the Pentagon?
 A Let's see. Probably while -- both, maybe. Both. Either whether she was at the White House or at the Pentagon. I think she -- you know, if she would ever go there, I think it was always when nobody else was around.
 Q Did she say anything about how these meetings with the President were arranged?
 A Not to me.
 Q Did she say anything about any role that a woman named Betty Currie may have played?
 A Betty Currie, she also got to know very well. And she -- I think when Betty Currie's mother was in the hospital, Monica brought balloons or something. So, this was another friend of hers.
 Q And do you know what position Betty Currie holds at the White House?

[1] A I must have, sure.
 [2] Q Do you remember discussions of that kind, where
 [3] Marcia was concerned about Monica's situation?
 [4] A Yes. I remember it because I guess Marcia -- now,
 [5] this is just my guess, but I think it's true. Monica -- I
 [6] don't know how much she confided in Marcia about what was
 [7] going on. But Marcia -- the main thing about Marcia was she
 [8] wanted her to make friends and have a normal life, which is
 [9] becoming increasingly impossible because everyone she worked
 [10] with, all the young people her age, the other interns or the
 [11] other people, were eschewing her because I guess they saw
 [12] something was happening.
 [13] Q All right.
 [14] A So, from that angle, yeah.
 [15] Q You mentioned that after Monica disclosed to you
 [16] the sink incident, there was pretty obvious confirmation that
 [17] there was a physical relationship. Did you convey that idea
 [18] to Marcia? Did you tell Marcia what you knew?
 [19] A No.
 [20] Q Why not? What was your thinking on that?
 [21] A Well, it seemed to me if Monica wanted Marcia to
 [22] know what was going on, Monica would tell her. I didn't
 [23] really think I wanted to get into that with her.
 [24] But I'm not sure -- you said that I confirmed there
 [25] was a physical relationship? No.

Page 40

Page 43

A Yes.
 Q What position is that?
 A Secretary to the President, I think.
 Q And what do you understand from Monica was the role that Betty may have played in this relationship she had with the President?
 A Well, I know that Monica may have said to me something like, Betty -- I'm waiting for Betty to call to see if I can go there. That kind of thing. I remember hearing that. Please don't ask when. I don't remember dates at all.
 Q Did Monica make frequent references to Betty and calls to Betty?
 A I think recently. I don't remember hearing much about Betty Currie except within the last few months.
 Q All right. Let's talk then a little bit about the concerns that your sister had about this.
 A You had mentioned earlier that you had come to believe that there was a physical relationship and that was confirmed fairly early on by Monica's description of the sink incident. What about your sister's reaction to all of this?
 A My sister was very upset about all this and she hated the thought that Monica would be infatuated with this man.
 Q Let's try to pick the times and dates of this as best we can. Again, let's focus on the fact that Monica was

[1] Q Okay. I don't --
 [2] A I didn't do that.
 [3] Q All right. You came to have a greater assurance
 [4] that there was some sort of physical relationship as a result
 [5] of that. Is that a fair statement?
 [6] A As a result of her saying that there was kissing
 [7] going on.
 [8] Q All right. So, the kissing would have been the
 [9] first thing that led you to think that there was a physical
 [10] relationship. Would the fooling around and the sink incident
 [11] be a further confirmation?
 [12] A Well, yes, I suppose.
 [13] Q All right. Did you try in any way to convey to
 [14] Marcia the significance of the relationship, or the nature of
 [15] the relationship, between Monica and the President?
 [16] A Let me try to think whether I actually told her
 [17] what Monica was doing. No, I don't think I told her.
 [18] Q Did you try to convey to her something about what
 [19] you knew, since Marcia is her mother, Monica's mother?
 [20] A Hmm. I'm trying to remember, because this is
 [21] important. I think we had general discussions about it. But
 [22] I don't remember if I was kind of a snitch and told her what
 [23] went on, or assumed she knew. I don't know.
 [24] Q Do you think she already knew?
 [25] A She knew something was going on, but I don't know

Page 44

1 if she knew details.
 2 Q Did she ever ask you if Monica had confided in you
 3 more details than Monica had confided in Marcia?
 4 A I remember Marcia saying Monica is very upset.
 5 would you please find out what's going on. She comes home
 6 from work and she's in a bad mood, she won't talk to me.
 7 What is going on?
 8 Q All right.
 9 A So, that's when I went out with Monica and I would
 10 try to find out what's happening with her.
 11 Q And when you found out, and Marcia had asked you to
 12 find out, did you tell her?
 13 A Somewhat.
 14 Q Okay.
 15 A I didn't tell her details.
 16 Q What I'm trying to get at is, when you say you told
 17 her somewhat, I'm trying to figure out what you did tell her.
 18 A No, I'm sorry. I don't remember exactly. I know
 19 that we both had an idea something's going on with this guy
 20 and I just don't really remember having conversations,
 21 telling her whatever it was I said. I know we, in general,
 22 knew something was happening.
 23 Q All right. Did you tell Monica's father anything
 24 about it?
 25 A No. I don't talk to him.

Page 45

1 Q All right. When you say that you tried to convey
 2 somewhat what you had learned from Monica to Marcia, when did
 3 you try to convey that? Would that have been while Monica
 4 was still at the White House? Or would it have been sometime
 5 after you learned of the kissing incidents, or would it have
 6 been sometime after you learned of the sink incident?
 7 A Hmm. Boy. I don't remember having -- I cannot
 8 recall anything, having actual discussions with her about
 9 that. I don't know.
 10 Q All right. You mentioned that at some point Monica
 11 expressed concerns about being labeled a stalker?
 12 A Uh-huh.
 13 Q I assume that happened sometime while she was
 14 working at the White House?
 15 A Right.
 16 Q Did she ever say anything about that label being
 17 unfair?
 18 A Yes.
 19 Q What did she say about that?
 20 A Okay. I think in relation to -- all I remember is
 21 an incident, like where she said the President called me at
 22 my office, and this sounds really immature, but the way she
 23 told it is, he said, if you walk down a certain hallway, I'll
 24 look out the window and wave at you. And then she said, and
 25 I got in trouble from Evelyn Lieberman. Evelyn Lieberman

Page 46

1 said I wasn't supposed to be there.
 2 And then she said, so, now they call me the
 3 stalker. They say that I keep going places I shouldn't be,
 4 when I'm invited.
 5 Q And what was unfair about that in her mind?
 6 A That she was invited to go there, but she couldn't
 7 say so, because she wanted to protect the President. So, she
 8 got a bad reputation, even though she was invited to come
 9 there.
 10 Q Did she say why she felt she had to protect the
 11 President?
 12 A Well, she didn't say, but I guess you, sort of you
 13 intuit that she has to make sure that nobody says he's asked
 14 an intern to come by and see him.
 15 Q Monica left the White House in April of 1996. Do
 16 you remember having any conversations with Monica about why
 17 she was asked to leave the White House?
 18 A Yes. Now, wait. I don't know that this -- it
 19 wasn't necessarily a conversation. But I think, I understood
 20 that Evelyn Lieberman or somebody named Timmy told her that
 21 they were disbanding her office, and her immediate supervisor
 22 and she -- I think the immediate supervisor was retiring or
 23 something, and she would be transferred to the Pentagon.
 24 And, I'm sorry, I don't remember whether she said
 25 this or I thought to myself that they are just trying to get

Page 47

1 her out of the way, or get rid of her, because I guess people
 2 were noticing that they were -- you know.
 3 So, I'm trying to remember. I don't think she
 4 thought that they were trying to get rid of her. I think I
 5 may have deduced it. I don't know.
 6 Q Did you mention to her what you thought?
 7 A I don't know. I'm not sure. Maybe. I could have.
 8 I don't know.
 9 Q Did Monica describe to you any meetings that she
 10 had with the President, after she had gone to the Pentagon,
 11 having to do with their relationship and, for example,
 12 whether the President had to be good for awhile?
 13 A I think so. I believe -- now, I don't know. I
 14 remember a discussion where she said she went there.
 15 Q When you say "went there", went to the White House?
 16 A Went to the White House. And I think she said that
 17 he told her that there isn't going to be any more physical
 18 relationship, that he has to be good, either a religious
 19 thing or somebody politically told him that this had to -- he
 20 shouldn't be fooling around.
 21 That's what gave me the idea that when she went
 22 there, it wasn't always for some physical thing. I think
 23 they had a friendship. So, I can't really tell you how many
 24 times there was anything physical that happened. And I think
 25 that's where the ambiguity is. They really had a friendship.

Page 48

1 He told her all kinds of very personal things about
 2 himself, his childhood and his abusive stepfather. So, I
 3 don't know.
 4 Q We'll turn to that in just a moment. This
 5 discussion that you are describing where Monica said
 6 something about meeting with the President, and the President
 7 saying something about having to be good for awhile, for
 8 whatever reasons, do you remember what the time of that was
 9 approximately, as best you can?
 10 A I believe it was in the summer before the election
 11 in November. So, I'm going to say July. I don't know why.
 12 I just have a feeling it was July.
 13 Q All right. Can you tell us what sort of personal
 14 things Monica said that the President had confided in her?
 15 You started to speak of some of them.
 16 A Yes, right. I think it was very touching. I think
 17 at that time she said that -- oh, I don't know if it was that
 18 time or another time. These are little snippets of
 19 conversation I remember.
 20 She said that he felt a connection to her, that
 21 they had similar backgrounds or similar childhoods. And
 22 that, I guess, he had an unhappy childhood and an abusive
 23 stepfather. And somehow they, you know, that he would
 24 confide something like that in her.
 25 Q How were they similar?

Page 49

1 A They were similar because her parents divorced at a
 2 certain age that was traumatic for her. And maybe she had an
 3 unhappy adolescence and he did, too. I think that may have
 4 been part of it.
 5 Q Did the President say anything to Monica about
 6 whether Monica might be able to come back to the White House?
 7 A Uh-huh.
 8 Q What did Monica tell you the President had told
 9 her?
 10 A Well, I think that she conveyed to him that she
 11 didn't like her -- not that she didn't like her job at the
 12 Pentagon, but it was very hard for her. She had to go on
 13 long overseas trips where she had to stay up and transcribe
 14 speeches while everyone else slept. And then they would get
 15 there. And because of the time change, she would be
 16 exhausted. It's very hard for her.
 17 And also she was working with people that she had
 18 nothing in common with. They were all older and she wasn't
 19 -- this was not something she was interested in.
 20 So, sometime, I don't know when, she must have
 21 asked him if it would be okay, could he find her a position
 22 back at the White House, would there be some way she could
 23 come back there.
 24 Q As best you can recall, when did she tell you about
 25 those conversations?

Page 50

[1] A Okay. I can only say that if she started working
 [2] there in April?
 [3] Q April of '96. The election would have been
 [4] November of '96.
 [5] A After the election. She, she may have started
 [6] asking him in the fall of '96. I don't know whether she told
 [7] me this or I surmised after the election maybe, people like
 [8] Evelyn Lieberman who were worried about his reputation maybe
 [9] wouldn't mind if she came back. I think I probably just
 [10] surmised that.
 [11] Q All right.
 [12] A I don't think she ever said that.
 [13] Q Well, what would have been the basis for your
 [14] surmising it then?
 [15] A Because it seemed to me Evelyn Lieberman and
 [16] whoever worked with her had arranged for her to be
 [17] transferred out.
 [18] Q All right. After the election then, what did
 [19] Monica tell you about any efforts to try to get her back to
 [20] the White House?
 [21] A Right. I think, once in a while she would bring up
 [22] -- once in a while, or maybe once, she mentioned that she had
 [23] either called or gone to see the President and asked if she
 [24] could come back. And he indicated that he would see if
 [25] anything was available. And this went on like sort of month

Page 51

[1] after month.
 [2] And then somehow I know she went and talked to
 [3] someone named Marsha Scott. And Marsha Scott apparently told
 [4] her there were no positions. Then Linda Tripp arranged for
 [5] her to have an interview with somebody at the White House for
 [6] a position, but she wasn't chosen.
 [7] So, I know there was some effort on her part to try
 [8] to get back there.
 [9] Q Let me go back a bit and ask questions about a
 [10] fellow named Walter Kaye.
 [11] A Okay.
 [12] Q Do you know Walter Kaye?
 [13] A Yes.
 [14] Q How long have you known him?
 [15] A About 12 years.
 [16] Q You are friends with Walter Kaye?
 [17] A Yes.
 [18] Q Did Walter Kaye play any role in getting Monica the
 [19] internship?
 [20] A Yes.
 [21] Q What was the nature of the role he played?
 [22] A Well, my family has known Walter Kaye for a long,
 [23] long time. My sister knows him. My husband knows him. I
 [24] know him. And in the -- when we moved here in the summer of
 [25] '94, his grandson was an intern at the White House.

Page 52

[1] So, when it was time for Monica to move here --
 [2] well, actually, I don't -- it must have been in May maybe or
 [3] March, whenever you apply for an internship, we thought it
 [4] would be nice if Monica could get an internship at the White
 [5] House when she was done with college in the summer of '95.
 [6] Q Right.
 [7] A So, one of us, I don't remember who, myself or my
 [8] sister, brought up the possibility to him. And I guess she
 [9] filed out applications and whatever had to be done. And
 [10] somehow he put in a good word or he wrote a letter or did
 [11] something to help her be chosen to be an intern.
 [12] Q Walter Kaye is friends with the President?
 [13] A Yes.
 [14] Q Is he --
 [15] A Well, he's a big contributor.
 [16] Q Big contributor?
 [17] A Yes.
 [18] Q Is he also friends with Hillary Clinton?
 [19] A Yes.
 [20] Q Which of the two is he better friends with?
 [21] A I think Hillary Clinton.
 [22] Q Have you ever discussed with Walter Kaye the fact
 [23] that President Clinton is a flirtatious sort of a fellow?
 [24] A Yes.
 [25] Q What sort of discussions have you had with Mr. Kaye

Page 53

[1] on that subject?
 [2] A Well, I remember different snippets of
 [3] conversations, and I remember that he would say -- we would,
 [4] somehow -- well, I'm trying to remember how. Either I told
 [5] him or somehow he already knew that Monica and the President
 [6] were getting very friendly. And I think it may have been
 [7] that he heard gossip at the White House from Debbie Schiff
 [8] and Ann McCoy and maybe even Evelyn Lieberman. I don't know
 [9] because he knew all those people.
 [10] Either he asked me or I brought it up. And then I
 [11] said something like, I can't believe this; this is
 [12] unbelievable. She goes to visit him and they're getting very
 [13] friendly. And he said something like, oh, that guy, he,
 [14] whew, you should see the way he looks at women, oh, boy.
 [15] So, yeah, I think he had the feeling that -- yeah.
 [16] Q Did he ever express an interest in trying to
 [17] protect the President from his own flirtatious nature?
 [18] A No, I don't think so.
 [19] Q All right. You mentioned that Walter Kaye was
 [20] friends with several people there at the White House.
 [21] A Yes.
 [22] Q I think you mentioned Debbie Schiff?
 [23] A Yes.
 [24] Q And an Ann McCoy?
 [25] A (Witness nodded indicating an affirmative)

Page 54

[1] response.)
 [2] Q What other people do you remember?
 [3] A Betty Currie, I'm pretty sure. And before she
 [4] left, Maggie Williams. I don't think she's there any more.
 [5] Everybody, Lisa Caputo.
 [6] Q Did he know Marsha Scott?
 [7] A Maybe. I don't know.
 [8] Q [REDACTED]
 [9] [REDACTED]
 [10] [REDACTED]
 [11] [REDACTED]
 [12] [REDACTED]
 [13] [REDACTED]
 [14] [REDACTED]
 [15] [REDACTED]
 [16] [REDACTED]
 [17] [REDACTED]
 [18] [REDACTED]
 [19] [REDACTED]
 [20] [REDACTED]
 [21] [REDACTED]
 [22] [REDACTED]
 [23] Q All right. Let me direct your attention to a party
 [24] that Walter Kaye threw. I believe it would have been in
 [25] early '97. Does that sound right?
 A I don't know. He threw many parties.

Page 55

[1] Q I thought he threw a party in early '97 that Monica
 [2] wanted to be invited to.
 [3] A Oh, that. Right. Oh, okay.
 [4] Q Why don't you tell us about that as best you can?
 [5] A Okay. I don't think he threw it. It was actually,
 [6] I believe it was some kind of a fundraiser or something at
 [7] the Waldorf Hotel in New York, which I think he always bought
 [8] lots of tickets to. And he would invite Ann McCoy and pay
 [9] for the hotel room, and Debbie Schiff. And he'd just do this
 [10] in exchange for his access to the White House.
 [11] And since he bought a whole table, I think Monica
 [12] wanted to go. And so she asked me if, when I saw him, could
 [13] I just mention it, because she'd be one of the many who gets
 [14] to go. So, when I asked him if she could, he said something
 [15] like, well, don't you think your niece is being kind of
 [16] aggressive with the President.
 [17] And that really made me mad. And I said, what do
 [18] you mean, who says that? And he mentioned that people at the
 [19] White House, Ann McCoy, Debbie Schiff, had been saying that
 [20] she was hanging around him and blah, blah, blah.
 [21] Q All right.
 [22] A And I guess I told him at that -- I don't know if I
 [23] told him or not. But I think I said, well, she's invited.
 [24] She's not a stalker, she's not hanging around. And I don't
 [25] know if he believed me or not, but -- that's all I recall of

Page 56

[1] that.
 [2] Q Do you remember saying anything to him like, well,
 [3] it's not just Monica who is being aggressive, that actually
 [4] President Clinton had made some telephone calls?
 [5] A Yes, I did. I told him that. Right.
 [6] Q Tell us about that.
 [7] A Okay. I think in the course of explaining that she
 [8] wasn't -- that's right. Thank you. In the course of
 [9] explaining that she wasn't chasing him, that he called her in
 [10] the middle of the night. I did tell him that. Yes.
 [11] Q When you said that to him, what was his reaction?
 [12] A I think surprise. I don't know if he believed me
 [13] or not, but he was surprised.
 [14] Q Did he ask you any followup questions about that at
 [15] all?
 [16] A I don't think so. I don't know.
 [17] Q The party that you are talking about, or whatever
 [18] it was, fundraiser perhaps, I think you said it was at the
 [19] Waldorf.
 [20] A Yes.
 [21] Q Do you remember approximately when that occurred?
 [22] A I don't know why, but I think it was in January.
 [23] So, I'm going to guess January.
 [24] Q Last year then?
 [25] A Not this January, not this recent one.

Page 57

[1] Q Right, but in '97?
 [2] A I don't even know if it was '97 or '96. Could have
 [3] been '96.
 [4] Q When we spoke earlier in the proffer-interview, you
 [5] said February of '97. I'm not trying to --
 [6] A I'm sorry.
 [7] Q No, I'm not trying to put words in your mouth. I'm
 [8] just trying to figure out what your best recollection is.
 [9] A I'm trying to remember if she was at the Pentagon
 [10] or at the White House still. Wait just a sec. I think I can
 [11] figure this out.
 [12] Okay. Maybe it was '97. It was after the
 [13] election. Okay. It was after the election. So, let's say
 [14] it was -- I'm sorry. I am bad, bad on dates.
 [15] Q So, you had that conversation with Walter Kaye.
 [16] How did that turn out? Did Monica actually get to sit at the
 [17] table?
 [18] A I think she went, but I don't think it had anything
 [19] to do with him. I think someone else invited her. She got
 [20] there somehow.
 [21] Q Sometime after that, I think you mentioned that in
 [22] '97 Monica tried to find a job in the White House.
 [23] A Right.
 [24] Q Had an interview with Marsha Scott.
 [25] A Yes.

Page 58

[1] Q Had an interview with someone that Linda Tripp had
 [2] helped out with?
 [3] A Right.
 [4] Q How did those work out?
 [5] A She did not -- she was not offered any jobs.
 [6] Q What was her reaction to that?
 [7] A She was disappointed.
 [8] Q All right. Any stronger reaction than that, or
 [9] simply disappointment?
 [10] A No, I don't remember.
 [11] Q What did it make her feel about the President?
 [12] A Well, I think that she felt that he wasn't really
 [13] trying, or maybe he was just saying he would try to help her
 [14] get back. I don't know.
 [15] Q Is that what she said?
 [16] A Hmm.
 [17] Q Because, again, we have to focus on not --
 [18] I understand.
 [19] Q -- just what you surmised, but --
 [20] A Oh.
 [21] Q -- what you recall her saying.
 [22] A I don't recall her saying those words, no.
 [23] Q All right.
 [24] A Or maybe I thought that.
 [25] Q Do you recall her saying something that led you to

Page 59

[1] that conclusion though?
 [2] A No. I don't recall her saying that, but I think I
 [3] got that feeling.
 [4] Q All right. Let me then turn to a slightly
 [5] different subject, although still related to Monica's efforts
 [6] to get a job. Vernon Jordan.
 [7] A Okay.
 [8] Q Do you know who he is?
 [9] A Yes.
 [10] Q Do you know him personally?
 [11] A No.
 [12] Q Ever met him?
 [13] A No.
 [14] Q Have you ever spoken with him on the phone?
 [15] A No.
 [16] Q When, with respect to Monica Lewinsky, did his name
 [17] first come up, as best you can recall?
 [18] A About November of '97.
 [19] Q In what context did it come up?
 [20] A I don't know if Marcia told me or Monica told me.
 [21] Maybe Marcia told me. That Vernon Jordan was helping her get
 [22] a job in New York.
 [23] Q When you and Marcia talked about Vernon Jordan, was
 [24] there a code name that --
 [25] A Yeah.

Page 60

[1] Q -- Marcia wanted you --
 [2] A We talked about this. For some reason, she decided
 [3] he would be Gwen.
 [4] Q Why did --
 [5] A Why?
 [6] Q -- she decide to use a code name for Vernon Jordan?
 [7] A I think as I told you at our interview, we always
 [8] had the feeling somebody was listening in to her telephone
 [9] calls.
 [10] Q Why would someone be listening in to her telephone
 [11] calls?
 [12] A Because of the White House, because of -- I don't
 [13] know. Don't know why. Because I think I told you that
 [14] Walter Kaye told me every phone in Washington is being
 [15] listened into by somebody, either an Embassy or the NSC or
 [16] somebody.
 [17] Q Even assuming that people were listening in on the
 [18] telephone, why would there be a need to have a code name for
 [19] anyone? But why would you need to have a code name for
 [20] Vernon Jordan?
 [21] A I guess because he's an important person. Also, I
 [22] think that's why there are code names for the Big Creep,
 [23] because probably, you know, if someone is listening in, you
 [24] don't want to go around saying President Clinton, President
 [25] Clinton, Hillary Clinton.

Page 61

[1] Q At least though in the circumstance of President
 [2] Clinton, there is something inappropriate about their having
 [3] a physical relationship.
 [4] A Right.
 [5] Q Was there anything inappropriate about what Vernon
 [6] Jordan was doing for Monica?
 [7] A Maybe. I don't know. Maybe that was the
 [8] motivation. I don't know.
 [9] Q What did Marcia say about this code name, as best
 [10] you can recall? Try and reconstruct that conversation, if
 [11] you would.
 [12] A Let's call him Gwen.
 [13] Q Why Gwen?
 [14] A Because there is an actress or a dancer named Gwen
 [15] Vernon. Our family is just weird.
 [16] Q All right. And when she said, let's call him Gwen,
 [17] what was your reaction?
 [18] A Okay.
 [19] Q All right. Did you ask why, or --
 [20] A No. I'm sorry. I told you we were weird.
 [21] Q All right. Other than calling the President Big
 [22] Creep, and calling Vernon Jordan Gwen, were there any other
 [23] people that you used these code names for?
 [24] A Oh, God. I don't know. Maybe.
 [25] Q Do you remember any?

Page 62

[1] A Well, unless you do, no. I don't know.
 [2] Q We'll ask it in two ways. One is, do you remember
 [3] using any code names for anyone when you talked with Monica?
 [4] A Could be. Maybe.
 [5] Q Who do you have in mind?
 [6] A I don't know, whatever he wrote there. I don't
 [7] know. Really, honestly, I don't remember.
 [8] Q All right.
 [9] A I'm sorry. There could be. Yeah, people at the
 [10] White House maybe. Oh, I know. Ann McCoy.
 [11] Q All right.
 [12] A She was Big Red.
 [13] Q She was what? Big Red?
 [14] A I'm sorry. It's just so dumb.
 [15] Q Okay. Was there any code name for Betty Currie?
 [16] A No, I don't think so.
 [17] Q When you spoke with Marcia, were there any code
 [18] names, other than the code name for Vernon Jordan?
 [19] A I don't think so. I don't know.
 [20] Q When you spoke with Monica about Vernon Jordan, did
 [21] you use the same Gwen code name that you had settled upon
 [22] with Marcia?
 [23] A I don't think so. I don't believe so.
 [24] Q Do you know whether, when Marcia and Monica spoke
 [25] with one another, they used Gwen?

Page 63

[1] A No. I don't know. I don't know.
 [2] Q When you and Marcia talked about Vernon Jordan, did
 [3] you use Gwen all the time, or did you sometimes use the word
 [4] Vernon, or Vernon Jordan, or Jordan?
 [5] A I think sometimes Vernon Jordan. I don't know. I
 [6] don't think we discussed it all that much, as far as I
 [7] recall.
 [8] Q Did you use that name only when you were on the
 [9] telephone?
 [10] A Probably, yeah. I think so. Or maybe just for
 [11] fun. I don't know.
 [12] Q Let's talk about the role that Vernon Jordan played
 [13] in helping Monica find a job.
 [14] A Okay.
 [15] Q What did you know about that from Monica?
 [16] A Well, I didn't talk to her all that much during
 [17] this time period. So, all I know is that I did hear that he
 [18] - she went to see him. I guess that's the first I heard of
 [19] it, where she said something like, what should she wear to go
 [20] see Vernon Jordan. Maybe Marcia told me or Monica. I don't
 [21] remember.
 [22] Q Okay.
 [23] A And then my reaction was, Vernon Jordan? What does
 [24] he have to do with this? And then I remembered that he was
 [25] President Clinton's friend. And somebody must have explained

Page 64

[1] to me, either Marcia, probably Marcia or Monica, I don't
 [2] really know. Somehow it turned out he was going to help her
 [3] get a job in New York.
 [4] Q All right.
 [5] A But I didn't know why, I didn't know how, or what
 [6] the connection was.
 [7] Q Did Monica describe any meetings with Vernon
 [8] Jordan?
 [9] A I remember she told me that she went to meet him
 [10] for breakfast, either breakfast or lunch and at his office.
 [11] Yeah. I remember that.
 [12] Q And did she tell you what efforts he was taking to
 [13] try to find her a job?
 [14] A Not in detail. She didn't go into that.
 [15] Q Did she tell you how often she had met with Vernon
 [16] Jordan?
 [17] A No, but I know that he set up some interviews for
 [18] her in New York and she went to advertising agencies, one or
 [19] two advertising agencies, and Revlon. I think that was
 [20] later. First it started with a couple of ad agencies and she
 [21] had to take a test at one of them. So, I remember her
 [22] describing that.
 [23] Q One of the things that you said during the earlier
 [24] interview was that you had some concern that until Monica
 [25] actually got a job offer, President Clinton might just, I

Page 65

[1] think the words you used were, "might just dump Monica".
 [2] A Right.
 [3] Q What did you mean by that?
 [4] A Well, my thinking, he was helping her, but not very
 [5] much. I mean, he did a few things to try to help her get a
 [6] job at the White House, but then nothing came of it. I
 [7] thought maybe he'd just get bored of the whole subject and
 [8] not help her any more.
 [9] Q Did you talk with Monica about that?
 [10] A Possibly. I may have.
 [11] Q What did you think Monica should do because that
 [12] was a possibility that they might just dump her, I guess, in
 [13] your words?
 [14] A Just continue to try to get something.
 [15] Q Okay. Would she be continuing to try to get
 [16] something by working with Vernon Jordan, or would she be
 [17] continuing to try to get something by speaking with the
 [18] President? Or both?
 [19] A I think Vernon Jordan.
 [20] Q Vernon Jordan. All right. After Vernon Jordan got
 [21] involved in the whole process of trying to find a job for
 [22] Monica, how did Monica react to that? Did she react
 [23] positively or was she excited about the prospect of getting a
 [24] job?
 [25] A I think she was hopeful, but she was also pursuing

Page 66

[1] her own other jobs differently, you know, on her own,
 [2] independently.
 [3] Q Tell us about that.
 [4] A I think she was thinking about applying to other
 [5] places.
 [6] Q What did she tell you on that score?
 [7] A I don't know, I just - I don't know. I just have
 [8] a feeling that she thought she'd better - she may have said
 [9] something like, I better think about where else I can work or
 [10] what I could do. I don't remember exactly.
 [11] Q All right. Let's turn our attention to some extent
 [12] to matters related to the Paula Jones litigation.
 [13] A Okay.
 [14] Q Did Monica talk to you at all about the Paula Jones
 [15] litigation?
 [16] A She didn't talk to me about it. But I think I
 [17] heard little snippets maybe from her or - she never told me
 [18] exactly. I think during that time I mentioned before I
 [19] wasn't here. I was in Aspen.
 [20] Q When you say "during that time"?
 [21] A Oh, the time that she, I guess, got called or
 [22] whatever it is. She got a letter or something that she was
 [23] involved in it. I don't know. Because I'm not really clear
 [24] on what the whole thing was.
 [25] Q All right.

Page 67

[1] A I mean, I know now, but I didn't know then.
 [2] Q Let me identify some occurrences and some dates,
 [3] and you can tell me what you remember about those dates or
 [4] those occurrences.
 [5] A At some point, I believe it's on December 5th,
 [6] 1997, Monica's name surfaced on a witness list.
 [7] A Hmm.
 [8] Q Do you remember Monica saying anything about being
 [9] on a witness list or possibly being a witness in a case?
 [10] A No. I did have knowledge during December that
 [11] something was going on. And if it was witness, I think I
 [12] told you before I didn't understand how she could be a
 [13] witness when she wasn't there, she hadn't seen it. And then
 [14] now I understand that "witness" doesn't mean you saw
 [15] something. It means you come and give your testimony.
 [16] Right?
 [17] Q Right.
 [18] A So, I don't think I was very clear on that.
 [19] Q On December 19th, she was served with a subpoena
 [20] Do you remember there being any discussion about being served
 [21] with a subpoena?
 [22] A No, I don't know. Maybe, but I don't - it wasn't
 [23] really something - I know it sounds amazing now, but it
 [24] wasn't really something that was very important or
 [25] interesting to me.

Page 68

[1] Q From your discussions either with Marcia or with
 [2] Monica, did Vernon Jordan have any connection to what Monica
 [3] was doing in the lawsuit?
 [4] A I know that he took her to see a lawyer, which was
 [5] in relation to this. But at the time it just -- well, I just
 [6] wasn't all that involved in it.
 [7] Q Other than what you just described, that is, taking
 [8] her to a lawyer, did Vernon Jordan do anything else for
 [9] Monica in connection with the Paula Jones litigation?
 [10] A I don't know.
 [11] Q Not that you know of?
 [12] A No.
 [13] Q At some point, did Monica convey to you that she
 [14] needed to sign something?
 [15] A Yes.
 [16] Q Tell us about that.
 [17] A She had to -- she was going to sign something that,
 [18] I guess, somehow, I guess it was this -- now I know it was
 [19] this affidavit. And I guess that -- I don't know why she
 [20] didn't sign it right away or she didn't -- I don't know what
 [21] it is. But she had to sign something. But she didn't sign
 [22] it right there.
 [23] Q Right where?
 [24] A At the office, I guess. I don't know. I guess she
 [25] had time to think about it or something. I don't know.

Page 69

[1] Q What is it that you are remembering that she said
 [2] to you about that at the time? I want you to try to separate
 [3] out what you know now from the benefit of recent events, and
 [4] what she told you at the time.
 [5] A I don't know, but I know that, I mean, I know that
 [6] she had to sign something or she was going to sign something.
 [7] I don't know. At the time, I guess I didn't know what it
 [8] was.
 [9] Q Did you know what the purpose of signing this thing
 [10] would be?
 [11] A No, not at the time, I don't think.
 [12] Q But you did know that signing it had something to
 [13] do with the --
 [14] A Vernon --
 [15] Q -- Paula Jones litigation?
 [16] A I don't even know if I knew that. I knew it was
 [17] something that Vernon Jordan wanted her to sign, or that
 [18] lawyer wanted her to sign.
 [19] Q I see. Okay.
 [20] A She was supposed to sign it.
 [21] Q We have been at this for an hour and a half. Do
 [22] you want to take a 10-minute break?
 [23] A Sure.
 [24] (Whereupon, the deposition was recessed from 4:44 p.m.
 [25] until 5:00 p.m.)

Page 70

[1] MR. EMMICK: We are back on the record.
 [2] BY MR. EMMICK:
 [3] Q I will remind you again that you are still under
 [4] oath.
 [5] A Right.
 [6] Q One of the things that we wanted to follow up on,
 [7] we had just been talking about Vernon Jordan. One of the
 [8] things that you said was that when Vernon Jordan's name came
 [9] up, you said, what does Vernon Jordan have to do with this.
 [10] My question is, what did you mean by "this"?
 [11] What's the "this" that you were quizzical about --
 [12] A Right.
 [13] Q -- Vernon Jordan's connection to?
 [14] A What does he have to do with her getting a job.
 [15] Why him, I think.
 [16] Q I see. It's not a reference in some way to what
 [17] does Vernon have to do with the lawsuit, or the Paula Jones
 [18] litigation, or anything --
 [19] A No.
 [20] Q -- like that?
 [21] A I think the surprise was his name suddenly, helping
 [22] Monica get a job.
 [23] Q All right. What I would like to do then is turn
 [24] our attention to early January, because my recollection is
 [25] that you had said that you were gone for much of December and

Page 71

[1] part of early January?
 [2] A Right.
 [3] Q Do you remember where you were during that time?
 [4] A In Aspen.
 [5] Q When did you come back from Aspen?
 [6] A About January 4th or 5th, something like that.
 [7] Q When had you left to go to Aspen?
 [8] A About the 24th of December.
 [9] Q Did there come a time in December when Monica spent
 [10] some time with you in the country, or what she calls the
 [11] country?
 [12] A Maybe. Could be. Yes.
 [13] Well, what is your recollection on that?
 [14] A I know she came and spent one Saturday with me.
 [15] Q Okay.
 [16] A But I don't know -- if you say December, then it
 [17] was December. I don't know.
 [18] Q Well, there's a reference in one of the tapes to
 [19] her initially having some plans to go to New York, then
 [20] deciding to spend a couple of days with you in the country.
 [21] A Right.
 [22] Q I am trying to determine your best recollection of
 [23] that.
 [24] A Okay, I -- yes, she did come and she spent a day
 [25] with me. I think it was a Saturday. I'm guessing. But she

Page 72

[1] didn't spend the night. She -- we -- yeah. The country,
 [2] meaning I have a house in Warrenton, you know.
 [3] Q All right.
 [4] A That's all I remember.
 [5] Q What is your best recollection of when that
 [6] occurred?
 [7] A I have no idea. If you say December, it was
 [8] sometime in December.
 [9] Q But I don't want to be --
 [10] A Oh, I'm sorry.
 [11] -- giving you words to accept or not accept. I
 [12] want you to give your best recollection. When was the last
 [13] time you saw Monica at Warrenton?
 [14] A She rarely comes there. I, I don't know. I don't
 [15] know.
 [16] Q Do you remember what, if anything, prompted her to
 [17] come to Warrenton the last time, or this one Saturday day
 [18] that you have in mind?
 [19] A Not specifically. Just, I don't know.
 [20] Q Do you remember if you talked with Monica about
 [21] anything in particular on that day?
 [22] A I'm sorry. I don't remember specifically. No.
 [23] Q Do you remember talking generally about her job
 [24] situation, or about anything?
 [25] A Maybe. I don't know. I don't remember

Page 73

[1] specifically.
 [2] Q All right. During January, was that the time that
 [3] Monica was talking about signing something?
 [4] A I guess. Yes. I guess so.
 [5] Q What makes you think that? What is making you
 [6] remember that?
 [7] A Just because you said it. I don't know.
 [8] Q Then --
 [9] A Okay.
 [10] Q You have to rely on your memory here. So, I'm
 [11] going to ask you in a different way. You come back from
 [12] Aspen.
 [13] A Right.
 [14] Q And when do you talk with Monica after you've come
 [15] back from Aspen?
 [16] A Hmm. I don't know. I don't know exactly.
 [17] Q Do you talk with Monica sometime during the first
 [18] several days after you get back from Aspen?
 [19] A Maybe. Could be.
 [20] Q Is that something that you would do ordinarily?
 [21] You've come back to Virginia. You've been gone for 10 days.
 [22] A Not really, no. I don't think so. Unless -- I may
 [23] have. I'm sorry. I don't know.
 [24] Q Did you meet with Monica from the time that you
 [25] came back from Aspen to the time on January 16th when our

Page 74

[1] office approached her?
 [2] A I may have, but I don't remember.
 [3] Q Do you remember having any conversations at all
 [4] with her during that time period?
 [5] A This would be from about the 6th to the 16th?
 [6] Q The 6th to the 16th, the 10 days. You've just
 [7] gotten back from Aspen and --
 [8] A I may have. I could have spoken to her, but I
 [9] don't remember specifically.
 [10] Q Did you speak with Marcia Lewis?
 [11] A I'm sure I did. More likely I talked to her.
 [12] Q At some point did you have conversations with
 [13] Monica about her job?
 [14] A I may have.
 [15] Q And getting a job?
 [16] A I may have asked her. If I had talked to her, I
 [17] may have said, how's it going, is anything happening.
 [18] Q At some point, did you understand that Monica did
 [19] get a job offer?
 [20] A Yes.
 [21] Q How do you think you learned that?
 [22] A You mean at Revlon?
 [23] Q Yes.
 [24] A Either she told me or Marcia did. I don't know who
 [25] told me.

Page 75

[1] Q Would it have been a conversation that you had in
 [2] person with one of the two of them, or was it a telephone
 [3] conversation?
 [4] A I don't know.
 [5] Q Were you in Washington or were you in Warrenton?
 [6] A I can't remember. I know, of course, obviously
 [7] someone told me. I don't remember. I don't even know if --
 [8] maybe I was in New York. I went to visit Marcia in New York
 [9] at some point.
 [10] Q Okay.
 [11] A Oh, I know. I was there on the 16th.
 [12] Q Right.
 [13] A Yeah. So, I don't know. I'm sorry.
 [14] Q Was it important for you to know about Monica's job
 [15] prospects? Is that something that would be of interest to
 [16] you?
 [17] A Yes.
 [18] Q Would Monica be interested in letting you know that
 [19] she had a job offer?
 [20] A Uh-huh. I'm sure she would.
 [21] Q But you just don't have any recollection of --
 [22] A Of the date. No.
 [23] Q I'm not asking about the date. I'm asking whether
 [24] you had such a conversation sometime during that 10-day span.
 [25] A I'm going to say, yes, I did, but I don't remember

Page 76

[1] it. I must have, because somehow I knew. So, somebody told
 [2] me. Maybe Monica. I'm not trying to be evasive. There's no
 [3] reason to. I just don't remember.
 [4] Q Okay. Did you have any conversations with Monica
 [5] during this time period about signing an affidavit?
 [6] A I knew she had to sign something, and I knew that
 [7] that would be, I guess, pleasing to Vernon Jordan.
 [8] Q Okay. What made you think that it would be
 [9] pleasing to Vernon Jordan?
 [10] A I guess she may have said, they want me to sign
 [11] this thing. They, and I assume that was Vernon Jordan and
 [12] this lawyer.
 [13] Q What did you understand that to mean?
 [14] A I didn't know it was an affidavit, but I knew it
 [15] was something she had to sign.
 [16] Q What did you understand her to mean when she said,
 [17] "they want me to sign it"? What did that convey to you?
 [18] A I don't know. Something they wanted her to sign.
 [19] Q Did she talk about who "they" were? Was it Vernon
 [20] Jordan? Was it the President? Was it her lawyer, a fellow
 [21] by the name of Carter?
 [22] A I've heard his name.
 [23] Q Who wanted her to sign it?
 [24] A I think Vernon Jordan. Somehow I knew Vernon
 [25] Jordan wanted her to sign something.

Page 77

[1] Q Okay.
 [2] A And I think that Frank Carter wrote it up.
 [3] Q Okay. Do you think that's something you learned
 [4] from Monica, or something you learned from Marcia?
 [5] A Oh, boy. I don't know. I don't remember who told
 [6] me.
 [7] Q Was it your impression that Vernon Jordan or
 [8] whoever else "they" might be, wanted her to sign this quite
 [9] badly?
 [10] A Yes. I think so.
 [11] Q Fair to say they are very interested in getting her
 [12] to sign this?
 [13] A Yeah, I guess.
 [14] Q And did you get curious about why they would be so
 [15] interested in this?
 [16] A I'm sorry. Not really. Because, you know, I have
 [17] my own things going on in my life and I'm a writer, and I had
 [18] assignments and my son. So, if I heard this stuff, I, I, --
 [19] now, of course, it's very important. But at the time, it's
 [20] just a long series of things. She went to Marsha Scott. She
 [21] did this, she did that. She's trying to get a job. Blah,
 [22] blah, blah.
 [23] That's why, now it seems so important to all of us.
 [24] But at the time, it's just another series of things.
 [25] Q Was there any connection in your mind between her

Page 78

[1] signing this thing, whatever it was --
 [2] A Uh-huh.
 [3] Q -- now you know it was an affidavit --
 [4] A Right.
 [5] Q -- and her getting a job?
 [6] A Yes. I did think there was a connection.
 [7] Q And what was that connection?
 [8] A I think if she signed this thing that Vernon Jordan
 [9] wanted her to sign, then it was sort of he would be happy and
 [10] he would help her, or be sure she got a job. That's what I
 [11] surmised.
 [12] Q All right.
 [13] A Nobody said that. But that's what I thought.
 [14] Q And what was said to you that made you surmise
 [15] that?
 [16] A Nothing was said specifically. But the fact that
 [17] here's Vernon Jordan who took her to see this Frank Carter
 [18] who wrote up something, and she was going to sign it, made me
 [19] think whatever it was, yeah, was sort of --
 [20] Q Did Monica come to that same conclusion?
 [21] A I don't know. I don't know. See, I don't remember
 [22] if I said that to her or that I just thought it. I may have
 [23] said it to her, but I don't know.
 [24] Q Do you know whether she talked about that with
 [25] Marcia?

Page 79

[1] A No, I don't know. I don't know how much Marcia
 [2] was, oh, interested in all this.
 [3] Q Did you ever get a call from Monica while she was
 [4] at Vernon Jordan's office?
 [5] A Me?
 [6] Q Yes.
 [7] A I don't think so.
 [8] Q Did you ever get a call from Vernon Jordan trying
 [9] to get hold of Monica?
 [10] A No. I've never spoken to him.
 [11] Q Did anyone at Vernon Jordan's office try to get
 [12] hold of her by calling your telephone number at the
 [13] Watergate?
 [14] A No. But I think we -- I don't know if this is what
 [15] you mean, but I think Monica may have stayed there while I
 [16] wasn't there. She may have gotten calls there.
 [17] Q Stayed at your apartment?
 [18] A Yes.
 [19] Q Why would she stay at your apartment rather --
 [20] A I'll tell you why.
 [21] Q -- than her own? Why?
 [22] A Because there's a mouse in her apartment. There
 [23] were mice in her apartment, which were discovered sometime in
 [24] December under where, under the living room sofa. You can
 [25] check this with the Watergate. And they had an exterminator

Page 80

come and they never caught the mouse. And since that time, my sister and Monica didn't want to stay there because of the mice. And if we weren't there, they would stay in my apartment.

Q All right.

A You can check with them, too. It's absolutely

true.

Q Okay. Let me ask you about a couple phone calls.

On the 6th of January, and just for your

information that would have been the day before Monica signed the affidavit, and I think you mentioned that that may be the day that you returned?

A Possibly.

Q Possibly.

A I have that written down somewhere. I don't know.

Q There was a phone call from Aiken Gump, which is

Vernon Jordan's law firm, to the phone number 965-1456.

A Right. That's my apartment.

Q Okay. Do you know anything about that phone call?

A Absolutely not. I may not have even been there.

Q Is it possible that Monica gave your telephone

number to Vernon Jordan because she knew that she might be staying at your place?

A Yes. That's possible. Or it's possible -- if you transfer a phone, you know, call-forwarding, if she was

Page 81

staying there and she call-forwarded her phone, I don't know if it would be her number on there or mine. I don't know. I don't know if they do it that way.

Q I'm not sure I know the answer to that either. All right.

There is a phone call I wanted to ask you a question about. It is back in November of '97. The phone call occurs on November 13th. It's at 7:30 at night.

A Okay.

Q Monica calls you at your 540 number. And here's the thing that is interesting about the timing of the call,

and I'm trying to jog your memory about it. She had entered the White House at 6:20 that same evening.

A Hmm.

Q And had spent an unknown period of time there.

A Uh-huh.

Q And then at 7:30, that is just an hour and 10 minutes later, she talked to you for 11 minutes.

A Okay.

Q What I want to ask you is, what was she calling you

about, because as interested as she was in things related to

President Clinton, if she calls you immediately after a

meeting with President Clinton --

A Right.

Q -- it's likely that the subject of President

Page 82

Clinton would have come up.

A Okay.

Q What do you remember about that phone call?

A November 13th. I don't -- is there anything --

Q Again, the date is not --

A -- about that that would have been important? Or?

Q Well, did you ever get any phone calls in fairly

recent --

A From the White House? She called me from the White

House?

Q No, no, no. She called you from her home.

A Oh. So, she --

Q She goes to the White House.

A -- goes to the White House and she comes --

Q She spends some period --

A -- home and calls me.

Q -- of time there, comes home, calls you very

shortly thereafter.

A Right.

Q And it strikes me that if she placed a call like

that to you, there must have been a reason for it. And since

you were one of her confidantes, she would have been free to

tell you whatever it was happened.

A Could you help me out? Was there something around

that time that's important? I don't know.

Page 83

Q Other than meeting the President at the White House?

A Yeah, I know. I mean, did something happen that

day or the day after? I'm sorry. I don't think --

Q Do you remember ever getting a call from her --

A Immediately, like --

Q -- fairly recently, where she said, gosh, I just

got back from visiting with the President?

A No. I'm sorry. I've been there when she's been

getting ready to go, if that helps. Like, for example,

sometimes she was putting on makeup and brushing her hair and

stuff. And I may have walked into her apartment. And she

probably said, I get to go and see him. But I don't

remember. I'm sorry.

Q You don't remember the phone call?

A No.

Q You remember preparation, if you will?

A Yes, I do. I remember an incident where she was

getting ready to go there.

Q What was the best timing that you could give to

that?

A Hmm. Probably November, December '97, recently.

Q All right. What makes you remember it? About what

time of the day was it, for example?

A It was evening. And I guess I just walked in or

Page 84

something and she was brushing her hair and putting on makeup

and getting ready to go there and visit.

Q Now, you were gone from the 24th to the 6th --

A December.

Q -- approximately?

A Right.

Q So, it couldn't have been in that time period.

A Right.

Q Do you remember whether it was a Friday or a

Saturday or a Thursday or a Wednesday?

A I think it was a weeknight, because she had -- she

was working. She was still working. So, it was a weeknight

after she had been working. I don't know when she left the

Pentagon or she stopped working there sometime.

Q Not until after Christmas.

A Okay. So, sometime in December.

Q So, you don't remember anything about this phone

call at all?

A I'm sorry. It's nothing -- no. Unless there is

something special that you could help me with about it that

could have been.

Q Other than she just got back from visiting

President Clinton in the White House, which some might regard

as special.

A No, because she visited him many times. It wasn't.

Page 85

you know, I don't think so. I mean, by this point, it wasn't

anything unusual or anything spectacular.

Q Did she ever call you to say that she had recently

been with the President?

A Recently, you mean to this time?

Q No, no. I mean recently, as in, gosh, I was just

with the President today?

A Oh, I just got back?

Q Just got back, yesterday I was with the President,

anything like that?

A No, she never -- not that I remember. She'd never

call me up and say, oh, guess what, blah, blah, blah, blah,

no. Usually it would be in person, as I mentioned before.

Q Right. You mentioned that you were in New York

when Monica called Marcia in order to explain to Marcia that

people from our office, including me --

A Right.

Q -- were talking with her?

A Right.

Q What was Marcia's reaction when she got that call?

A She was shocked and scared.

Q Did she explain to you what was going on?

A No. I don't think she knew. All she knew was that

Monica had gone to Pentagon Mall, I think, and then now she

was at the Ritz Carlton Hotel with you. And she just, she

Page 86

[1] knew she had to come immediately.
 [2] Q Okay. You decided to go with her?
 [3] A Right.
 [4] Q Why?
 [5] A Moral support. And our mother, too.
 [6] Q What do you mean?
 [7] A Our mother was there, too. Marcia's and my mother.
 [8] Q Traveled down on the train with you?
 [9] A Right.
 [10] Q After you got to Union Station --
 [11] A Right.
 [12] Q -- where did you and your mother go?
 [13] A My mother went with Marcia to the Ritz Carlton
 [14] Pentagon, and I went to my apartment at the Watergate.
 [15] Q Did you connect up the fact that the FBI was
 [16] speaking with Monica at the Ritz Carlton with what you knew
 [17] to be the relationship between Monica and the President? Did
 [18] you think there was some connection there?
 [19] A Let me remember. Yes. Right.
 [20] Q What did you think?
 [21] A At the time, you mean? On the train?
 [22] Q Yes.
 [23] A Hmm. I don't know. I don't know what it was, but
 [24] I knew it was something to do with that, and that Linda Tripp
 [25] had been tape-recording her. I knew that.

Page 87

[1] Q Okay.
 [2] A I think I knew it then. I don't know if I knew it
 [3] then, or now I knew what it was.
 [4] Q That was the night of the 16th.
 [5] A Is that a Friday?
 [6] Q Yes.
 [7] A Friday.
 [8] Q And on the morning of the 17th, at 9:00 in the
 [9] morning, there is a call placed from [REDACTED] which I
 [10] believe is Monica's number?
 [11] A My sister's, actually, Marcia's.
 [12] Q Marcia's, all right.
 [13] A Right.
 [14] Q To [REDACTED]
 [15] A Right.
 [16] Q What is that second number?
 [17] A That's where my mother lives.
 [18] Q Okay.
 [19] A You have to be careful with those, though, because
 [20] there is always call-forwarding. If Marcia was staying up
 [21] there, she may have forwarded her phone up there.
 [22] Q Was Marcia staying up there?
 [23] A Possibly. Could be. Not at that time, but after
 [24] that she did.
 [25] Q Okay.

Page 88

[1] A I don't know if she -- at 9 o'clock, I don't know
 [2] where she was at nine in the morning, but I know that she
 [3] didn't stay there.
 [4] Q Let me ask this question delicately. What did your
 [5] mother know about all of this?
 [6] A Very little. Nothing. She's very old and
 [7] confused.
 [8] Q How old is she?
 [9] A She's 80. She has Alzheimer's. So, she doesn't
 [10] know much.
 [11] Q Okay. How long did you remain in Washington, D.C.
 [12] after coming down with Marcia and your mother?
 [13] A I spent the night, I'm sure. I'm trying to
 [14] remember. I would have to look at a calendar. Probably --
 [15] I'm sure the next day, I may have gone back to Warrenton on
 [16] Sunday. I think that's when my husband was in LA.
 [17] Q Okay.
 [18] A And he comes back on a Sunday. So, I don't know.
 [19] Probably -- well, I know the next day.
 [20] Q All right. That's fine. There is a reference on
 [21] one of the tapes to your sister and you going to something
 [22] called an arrival ceremony.
 [23] A Hmm.
 [24] Q Do you know what that is?
 [25] A Yeah. Oh, I know what it is, but that's a long

Page 89

[1] time ago. Yeah.
 [2] Q I'm jumping around in time.
 [3] A Okay.
 [4] Q Tell me what the arrival ceremony was and how you
 [5] and your sister came to be there.
 [6] A Okay. I think it was something to do with the
 [7] President of Korea. Right? If that's correct. One time we
 [8] stood out in the hundred degree weather. And I remember
 [9] waiting for the President of Korea to come and then he came
 [10] out on a balcony and waved. And there were lots of other
 [11] people. And that's all I remember.
 [12] Q Was this an occasion when President Clinton was
 [13] there?
 [14] A Yes.
 [15] Q Did you meet the President then?
 [16] A Not at that time, but I had met him at a different
 [17] thing, once. Or twice.
 [18] Q Did Monica make arrangements for you to be there at
 [19] the arrival ceremony?
 [20] A Yes, she did.
 [21] Q Okay. Was Monica there with the President in any
 [22] sense?
 [23] A Not really. She was standing with us.
 [24] Q Did Monica and the President catch each other's
 [25] eyes at all, or wave to one another, acknowledge one another?

Page 90

[1] A Not that I recall. Not -- no.
 [2] Q There is a note that we found at Monica's
 [3] apartment, and it says "Love, Deb" at the bottom. We will
 [4] mark it DF 3.
 [5] (Deposition Exhibit DF 3 was
 [6] marked for identification.)
 [7] BY MR. EMMICK:
 [8] Q It has two pages. It looks like it may be a
 [9] continued note. Why don't you take a look at it and tell us
 [10] if you recognize it.
 [11] A "Monica was called by" --
 [12] Q Tell us what you recognize it to be.
 [13] A -- "Betty to come at 9:30 a.m."
 [14] Q That may be the second page of the note, but take a
 [15] look.
 [16] A "She'll take the plane. We have tickets for you."
 [17] Oh. "Monica was called" -- okay. Just a minute. "Hi, Marsh
 [18] and Peter." All right.
 [19] "Dear Monica, this is some of your stuff I
 [20] drycleaned. Ready tomorrow. Love, Mom."
 [21] "White House 9:30 this a.m. She'll take a plane to
 [22] N.Y. See you at temple. We have tickets."
 [23] Okay. Right.
 [24] Q That's a note written by someone named Deb?
 [25] A No, that's me. Yes, I wrote that.

Page 91

[1] Q You wrote it?
 [2] A Yes.
 [3] Q What's it about?
 [4] A Okay. This is about tickets, temple, and Peter.
 [5] So, it must have been a Jewish holiday. It must have been
 [6] September, September '97 or something.
 [7] Q Rosh Hashanah?
 [8] A Okay. Right.
 [9] Q The reference there to "Monica was called by Betty
 [10] to come at 9:30 this a.m." --
 [11] A Right.
 [12] Q -- what is that about?
 [13] A That Betty told her she could come and see the
 [14] President.
 [15] Q Okay. And how do you know that's what that refers
 [16] to? What did you discuss with Monica about that, that caused
 [17] you to write that note?
 [18] A Just to tell her mother, I guess. "She'll take the
 [19] plane."
 [20] Q Well, let's take it a piece at a time.
 [21] A Okay.
 [22] Q It says, "Monica was called by Betty to come at
 [23] 9:30 this a.m." What do you understand that to mean?
 [24] A To come to the White House.
 [25] Q And Betty you understand to be a reference to Betty

Page 92

[1] Currie?
 [2] A Right.
 [3] Q Is this a call that you got, or is this a call that
 [4] Monica got and she told you about it?
 [5] A Well, I didn't get a call from Betty. So, Monica
 [6] must have. Monica must have told me. Yeah.
 [7] Q Why are you writing that note to Marcia?
 [8] A I don't know. Where is Monica though? "She'll
 [9] take the plane." I don't know. I mean, I guess Monica told
 [10] me to let her mother know. So, Monica was -- I don't know.
 [11] I'm sorry. I don't know.
 [12] Q When you say there, "She'll take the plane", it
 [13] suggests that perhaps there is a family meeting, or you are
 [14] going to be meeting with Marcia and Peter --
 [15] A Right.
 [16] Q -- and that rather than perhaps Monica going with
 [17] you, she'll catch up with you by taking a plane. Is that --
 [18] A Right.
 [19] Q -- what's happening?
 [20] A I guess so, but where is she. Where is Monica?
 [21] Q I'm asking --
 [22] A I know. No, I'm trying -- I don't understand this.
 [23] This was Rosh Hashanah, let's say, or Yom Kippur, I don't
 [24] know which one. They were coming, Marcia and Peter were
 [25] coming with us.

Page 93

[1] Q Okay.
 [2] A You need tickets. "She'll take the plane."
 [3] Q Where were you going to go to temple?
 [4] A Here, Washington Hebrew Temple. Here, this is in
 [5] Washington, here.
 [6] Q Okay.
 [7] A This was in Washington.
 [8] Q What does "She'll take the plane" refer to then?
 [9] A I don't know. Was Monica going to go to New York?
 [10] I'm sorry.
 [11] Q I'll have to ask you that. I don't know.
 [12] A I don't know.
 [13] Q Is it possible that you were going to go to temple
 [14] up in New York?
 [15] A No. It was here. We, Marcia and Peter, her
 [16] fiancée, were going to come meet us at the temple. "Monica
 [17] was called by Betty to come at 9:30 this a.m. She'll take
 [18] the plane." I'm sorry.
 [19] Q Well, let's just focus then on the portion of it
 [20] that says that Betty called and arranged for some sort of a
 [21] meeting with the President.
 [22] A Right.
 [23] Q What do you remember about that?
 [24] A I don't know. Well, I don't even know when it was.
 [25] September, October? I know that Betty would call her to come

Page 94

[1] and visit him. But I don't know this specific day, if it was
 [2] anything important or interesting.
 [3] Q All right.
 [4] A What I don't understand is "She'll" -- okay.
 [5] Q You had a question that you were about to ask?
 [6] A I'm just -- I don't know what this means, "She'll
 [7] take the plane."
 [8] Q I'm not sure either.
 [9] A Okay.
 [10] Q What about the second half there. Does that help
 [11] remind you?
 [12] A Monica was called to the White House. "She'll take
 [13] a plane to New York. See you at temple. We have tickets."
 [14] Okay. I guess she was going to go to New York after she went
 [15] to the White House. I don't know.
 [16] Q Is it possible that the three of you were going to
 [17] go from temple up to New York?
 [18] A No, not at all.
 [19] Q Okay.
 [20] A No, because I remember that. My son is here. So,
 [21] no. Do we know what day this was, date?
 [22] Q That's part of what we are asking you.
 [23] A You are asking me now. I'm sorry. I don't know.
 [24] But I guess you could find out. All you have to do is find
 [25] out when Rosh Hashanah was.

Page 95

[1] Q Are you sure it was Rosh Hashanah?
 [2] A Well, one of those two, Yom Kippur or Rosh
 [3] Hashanah. They are within a week.
 [4] Q Do you remember what day of the week it was?
 [5] A No, but I'm sure that's easy to, you know -- just
 [6] look on a calendar. I know this was now. This was '97.
 [7] Q Right.
 [8] A At least that's helpful, maybe.
 [9] Q All right. Let's just bypass it then.
 [10] A I'm sorry.
 [11] Q This is a handwritten document. It has 12
 [12] paragraphs and 10 pages. We will mark it as DF 4.
 [13] (Deposition Exhibit DF 4 was
 [14] marked for identification.)
 [15] BY MR. EMMICK:
 [16] Q What we would like to ask you to do is to take a
 [17] look at the handwriting on this and tell us if you recognize
 [18] it as Monica's?
 [19] A Hmm. I don't recognize it, but it might be. It's
 [20] not actually handwriting. It's printing.
 [21] Q Right. It's more like printing.
 [22] A I don't know.
 [23] Q So, maybe it's more difficult to --
 [24] A I couldn't say without more information who wrote
 [25] it, unless it's signed.

Page 96

[1] Q All right.
 [2] A No, I wouldn't know.
 [3] Q Fair enough. I want to ask you a little bit about
 [4] the use of credit cards by Monica and by Marcia.
 [5] A Okay.
 [6] Q Did they share credit cards, do you know?
 [7] A Yes, I think so. Sometimes Marcia would let Monica
 [8] use her credit card, I think.
 [9] Q So, did Monica have her own credit cards, or a
 [10] the charges that were made, they just went on Marcia's card?
 [11] A I don't know if Monica has her own. I know she has
 [12] a bank, like an ATM card. I don't know. I don't know.
 [13] Q There are credit card charges that are made fairly
 [14] regularly up until mid-1997 on the credit cards used by
 [15] Marcia and Monica.
 [16] A Uh-huh.
 [17] Q The use of those cards then drops off very
 [18] dramatically. Is there anything that happened in the middle
 [19] of 1997 that caused the use of those cards to drop off?
 [20] A When is this? I don't know. When you say the
 [21] middle, when would that be?
 [22] Q I don't know which particular month it was, but I
 [23] think it was in the summer.
 [24] A No, I don't know anything about that.
 [25] Q Okay. Let me ask you about psychiatrists or

Page 97

[1] psychologists or similar that Monica may have used. Do you
 [2] know whether she has ever seen a psychologist or a
 [3] psychiatrist?
 [4] A Yes, I do.
 [5] Q What can you tell me about that?
 [6] A I know she went to a psychologist in LA, a long
 [7] time ago. She went to two. She went to two women. One was
 [8] Judith Bin-Nun, B-I-N dash N-U-N, Judith Bin-Nun. And the
 [9] second one is somebody whose last name is Kassoria. She's
 [10] just surfaced recently. That's it, I think.
 [11] Q What was the purpose of her going to these two
 [12] psychologists?
 [13] A I think after my sister and her ex-husband's
 [14] divorce, Monica was upset.
 [15] Q Why did she see two separate psychologists?
 [16] A She went to the first one, I think, when she was
 [17] much younger. And then she went to the other one a few years
 [18] later.
 [19] Q What did she tell you about seeing those
 [20] psychiatrists or psychologists?
 [21] A Nothing specific.
 [22] Q You mentioned that they were from Los Angeles.
 [23] A Uh-huh.
 [24] Q When did the psychologist/client relationship end?
 [25] I mean, was it a one-time thing quite awhile ago?

Page 98

1 A No. I think it continued for awhile, each one.
 2 Q With both?
 3 A Yes.
 4 Q One of the articles about Ms. Kassoria makes a
 5 reference to her being some sort of a sex-related
 6 psychologist.
 7 A I didn't see the article. I don't know.
 8 Q Do you know anything about that, based on what
 9 Monica may have told you?
 10 A No. No, but I think she mainly went to her to help
 11 her lose weight, because I remember that Dr. Kassoria tried
 12 to help her lose weight. I thought that was the main reason.
 13 Q I see. Were either of them prescribing any sort of
 14 medication to her?
 15 A I don't think so.
 16 Q Do you know whether either of them diagnosed her as
 17 having any sort of mental problems, other than --
 18 A No.
 19 Q -- depression.
 20 A I don't know. I never heard about it.
 21 Q Did she ever see a psychiatrist or a psychologist
 22 by the name of Hill? Does that ring a bell at all?
 23 A Not at all.
 24 Q Did she ever see a psychologist or anything like
 25 that at a weight loss clinic?

Page 99

1 A I guess so. She went to something called the Rader
 2 Clinic in LA. But I don't know what they did there.
 3 Q There are a couple of references on the tapes to a
 4 person described as a Christian Scientist.
 5 A Uh-huh.
 6 Q Who is this Christian Scientist? What do you know
 7 about that?
 8 A I don't know. I don't know what the context of the
 9 -- what she was talking about.
 10 Q Well, has she ever described her having
 11 conversations with somebody that she refers to as a Christian
 12 Scientist?
 13 A Yes. Christian Science is a religion and I think
 14 she's interested in it.
 15 Q Okay. Did she go to any Christian Science
 16 churches? I don't know very much about Christian Science
 17 myself, so I don't --
 18 A She may have.
 19 Q Did she ever mention going to a Christian Science
 20 church here in Washington or anywhere else?
 21 A Not to me.
 22 Q Did she ever mention the names of anybody who was
 23 in the Christian Science church?
 24 A Not to me.
 25 Q What about the following? Marcia wrote a book

Page 100

1 about the three tenors.
 2 A Right.
 3 Q So, it has occurred to people that she may be
 4 interested in writing a book about all of these events.
 5 A Hmm.
 6 Q So, I want to ask you, have you heard Marcia or
 7 Monica talk about any plans to write a book?
 8 A Well, we were told by all the attorneys, no book
 9 deals, nothing like that.
 10 Q Okay. And did you have conversations with either
 11 Monica or Marcia about any book deals?
 12 A Yes, I'm sure I may have.
 13 Q Okay. What were those conversations about?
 14 A Maybe someday we could write a book. That's all.
 15 Q When did those conversations take place?
 16 A Could have been within the last few weeks maybe.
 17 Q Who would that have been a conversation with?
 18 Would it have been with Monica or would it have been with
 19 Marcia?
 20 A Not with Monica. Possibly I spoke with Marcia.
 21 Q Okay. What prompted that subject to come up?
 22 A Probably discussions about legal fees.
 23 Q Was it a long conversation?
 24 A I think several times it's been discussed.
 25 Q Several times. All over the last couple of weeks

Page 101

1 or even --
 2 A Well, I'm sure.
 3 Q -- further ago than that?
 4 A I don't know. I'm sorry. But then, whenever this
 5 started, I think.
 6 Q Since January 16th?
 7 A I don't think that long ago. No.
 8 Q February and March?
 9 A Possibly, yes.
 10 Q Who have you talked to in addition to Marcia, if
 11 anyone, about the possibility of writing a book?
 12 A Oh, let's see. I have mentioned it to my husband.
 13 And I have talked to -- I have talked to -- myself writing a
 14 book, you mean? Me?
 15 Q Well, we'll start with you and then we'll get to
 16 Marcia in a second.
 17 A I have talked to a book agent.
 18 Q With what company?
 19 A His name is -- Marcia's agent, who helped her with
 20 her book.
 21 Q What has been discussed on that score?
 22 A Well, actually it wasn't about myself. And it was
 23 about whether, after this is all over, is there a possibility
 24 of writing a book. I wasn't really sure anyone would be
 25 interested in a book by an aunt or a mother. So, nothing

Page 102

1 came of it.
 2 Q Did you have a meeting with this agent?
 3 A Uh-huh.
 4 Q What's the agent's name?
 5 A His last name is Mahon, M-A-H-O-N, and his first
 6 name is Paul.
 7 Q Was there a discussion of money?
 8 A Hmm, just sort of, yeah, but not really, because he
 9 didn't think that Marcia or I would really be anybody that
 10 would be writing a book of any interest to anyone. He
 11 thought if anyone writes a book it will be Monica. And then
 12 I told him, well, that's impossible because her lawyer has
 13 said, absolutely nothing.
 14 Q When did you have these conversations or
 15 conversation with Paul Mahon?
 16 A Probably a month ago maybe.
 17 Q Was there only one conversation with him?
 18 A Yes.
 19 Q How were things left with Mr. Mahon?
 20 A That there was no -- there would be no book. There
 21 would be no book deal.
 22 Q Did you consider going to another agent? Or did
 23 Marcia consider it?
 24 A Not seriously, no.
 25 Q Who made arrangements to meet with Mr. Mahon?

Page 103

1 Mr. Mahon --
 2 A I did.
 3 Q -- call you or --
 4 A I did.
 5 Q Was that at your urging or was it at Marcia's
 6 urging, or did --
 7 A Well, actually, originally, originally Marcia heard
 8 that Linda Tripp had started all this because she had a book
 9 deal. So, she said something like, this is unbelievable; all
 10 of this was because that woman wants to make money? So, that
 11 was one thing.
 12 Then she got a letter from her publisher of her
 13 first book about the three tenors. And something about
 14 royalties, that there's no royalty statement yet. So, she
 15 asked me to call Mr. Mahon and find out what was going on
 16 with that.
 17 So, I talked to him and then I asked him about a
 18 book deal for my sister, whether she could do it or I could
 19 do it. Then we met and he said, well, I don't think it's you
 20 and her, I think maybe Monica.
 21 Q Did Marcia appear to want a book deal?
 22 A Not particularly, no.
 23 Q Did you want a book deal?
 24 A Not particularly.
 25 Q Has anyone else tried to contact either of you

Page 104

1 about a book deal?
 2 A No.
 3 Q Have you had any contact with either of President
 4 Clinton's attorneys, Williams and Connolly or --
 5 A No.
 6 Q Okay. One of the things that you said earlier,
 7 when I asked you the question who else did Monica tell you
 8 knew about the physical relationship, if you will, with the
 9 President, you indicated that Linda Tripp did.
 10 A Uh-huh.
 11 Q Then I asked you about Ashley Raines and about
 12 Catherine, whose last name was Davis. And you said that you
 13 didn't know whether they knew about the relationship or not.
 14 A Uh-huh.
 15 Q The reason that I was wanting to follow up on that
 16 is that one of the things that you said during the earlier
 17 interview, and it's reflected in an FBI interview report, is
 18 that you had met Ashley Raines, and that Monica had told
 19 Raines about her relationship with Clinton.
 20 A Hmm.
 21 Q So, I guess what I am asking you is, did you
 22 understand that Monica had told Ashley Raines about the
 23 relationship with Clinton?
 24 A Yes. I guess she told her something, but I didn't
 25 know how much Ashley knew.

Page 105

1 Q Okay. Another thing you said was that Lewinsky's
 2 friend, Catherine, last name unknown, also knew about
 3 Lewinsky's relationship with Clinton.
 4 A Really? Catherine in Hawaii?
 5 Q Yes. Well, formerly in Hawaii, now --
 6 A I guess.
 7 Q -- somewhere else.
 8 A Maybe, yeah.
 9 Q What is your best recollection now about whether
 10 Catherine or Ashley Raines knew about the relationship with
 11 Clinton?
 12 A I don't know. At the time of the interview -- I
 13 guess Ashley knew something. Ashley was her only loyal
 14 friend.
 15 Q Again, I'm really focusing more on what things did
 16 Monica tell you about other of her friends that she had told
 17 about the relationship with President Clinton?
 18 A That's all. I didn't -- are you sure I said
 19 Catherine?
 20 Q Well, that's what the --
 21 A Oh, okay.
 22 Q That's what the interview report said.
 23 A Oh, okay.
 24 Q Sometimes mistakes get made, but that's the reason
 25 why we follow up and ask and try --

Page 106

1 A Okay.
 2 Q -- to get clarifications.
 3 A I don't remember thinking that Catherine knew
 4 anything. I was shocked when you flew her here. So, I'm
 5 sorry I said that. I don't know.
 6 Q All right.
 7 BY MR. UDOLF:
 8 Q I just have a few followup questions. We discussed
 9 earlier your questioning what did Vernon Jordan have to do
 10 with Monica's finding a job. I would like to follow up and
 11 ask another question.
 12 What did Vernon Jordan have to do with helping
 13 Monica get a lawyer?
 14 A I don't know. Somehow he got her a lawyer.
 15 Q Do you know how that came about?
 16 A No.
 17 Q Did you ask her, why was Vernon Jordan helping her
 18 get a lawyer?
 19 A I'm trying to remember. No, I don't think I asked
 20 that.
 21 Q Did you think it was unusual?
 22 A Yes.
 23 Q Is that why you formed a connection that the job
 24 was related to her signing whatever it was they --
 25 A Yes, I think so.

Page 107

1 Q -- wanted her to sign?
 2 A Uh-huh.
 3 Q What did Monica tell you about Frank Carter, what
 4 he was doing for her?
 5 A I don't know. He was -- I don't know. He was
 6 writing up something.
 7 Q In connection with what?
 8 A I didn't know at the time. Now, I know, but I
 9 didn't know then.
 10 Q Weren't you curious enough to ask?
 11 A No, not -- no. Now it is important. At the time,
 12 I didn't know.
 13 Q Well, usually when people get lawyers involved,
 14 it's bad news. It didn't cause you any concern that she was
 15 needing a lawyer, that Vernon Jordan was taking her to see a
 16 lawyer?
 17 A Not particularly.
 18 Q Do you know anything about a blue cocktail dress
 19 that Monica may have had?
 20 A Blue? No. Blue cocktail dress?
 21 Q Or a dark-colored cocktail dress?
 22 A (No response.)
 23 Q Have you ever seen anything like that?
 24 A No. She has a red one. No, I don't know.
 25 Q Did you discuss with Monica what you were going to

Page 108

1 be asked about here today?
 2 A No.
 3 Q When was the last time you talked with Monica about
 4 these matters?
 5 A After the lawyer said, you don't discuss the case,
 6 we do not discuss the case.
 7 Q When was that?
 8 A As soon as -- as soon as I got a lawyer. As soon
 9 as she got a lawyer.
 10 Q So, you --
 11 A She told me, from the very day, the day that the
 12 FBI took her --
 13 Q January 16th?
 14 A Right. We were told, you do not discuss this. You
 15 never talk about any of this at all.
 16 Q Have you authorized anyone else to talk about it
 17 for you with --
 18 A No.
 19 Q -- either her representatives or your sister's
 20 representatives?
 21 A My lawyer talks to her lawyers. Yes.
 22 Q Can you tell us what sort of discussions you had
 23 with Monica about Linda Tripp?
 24 A Sure. Yes. Linda Tripp, as I said already, was
 25 this strange woman at the Pentagon who is much older, and

Page 109

1 very interested in Monica's private life. And Monica told me
 2 that she told her all kinds of things.
 3 I told you she told her she was psychic. It seemed
 4 to me she was very meddlesome and I think I thought she was
 5 obsessed with Monica.
 6 Q Did Monica buy into Ms. Tripp's representation
 7 about her interest in sorcery? Is Monica interested --
 8 A I don't know that it was sorcery.
 9 Q -- in that sort of thing?
 10 A No, not at all. But I think when she was told that
 11 that woman had psychic powers, I think it interested her.
 12 Q Anything beyond just being interested from an
 13 academic point of view?
 14 A Not that I know of.
 15 Q Did she ever tell you or discuss with you any talks
 16 she might have had with Ms. Tripp about her being a possible
 17 witness in the Jones case?
 18 A No, not that I know of. She didn't tell me that.
 19 Q Did she ever talk to you about any of these talking
 20 points? Do you know what I mean by that?
 21 A I do. I saw them in the newspaper. No.
 22 Q You've never discussed that with Monica at all?
 23 A Not before, no. And not after. So, no.
 24 Q So, never?
 25 A Right. I don't know who wrote those and I don't

Page 110

[1] know anything about it.
 [2] Q Have you ever heard any phone messages on Monica's
 [3] machine, or on any machine, that were represented to you to
 [4] be from the President?
 [5] A No. I didn't hear.
 [6] Q Did she ever tell you that she had received phone
 [7] messages from the President?
 [8] A Messages? No. But she told me about the phone
 [9] calls.
 [10] Q What did she tell you about the phone calls?
 [11] A That she got those phone calls in the middle of the
 [12] night.
 [13] Q Did she ever tell you what they talked about?
 [14] A No.
 [15] Q You weren't curious to ask?
 [16] A No.
 [17] Q Okay. We were talking about nicknames before.
 [18] A Right.
 [19] Q Have you ever heard the nickname Babba, The Babba?
 [20] A Yeah.
 [21] Q In what connection have you heard that?
 [22] A Hillary Clinton is The Babba.
 [23] Q Who gave her that nickname?
 [24] A Monica, I guess.
 [25] Q Do you know where she got that from?

Page 113

[1] Q Did she continue to be interested in drama and the
 [2] activities you described before?
 [3] A Yes, uh-huh. I think so.
 [4] Q Did she ever have any kind of problems in high
 [5] school of alcohol or drugs or --
 [6] A Never.
 [7] Q -- anything like that?
 [8] A Never. No problems.
 [9] Q Now, Monica went off to junior college first,
 [10] right?
 [11] A Right, uh-huh.
 [12] Q Did she do well?
 [13] A Yes. She did very well.
 [14] Q And as a result of that, she went to Lewis and
 [15] Clark College, right?
 [16] A Right.
 [17] Q And that's a pretty high-quality liberal arts
 [18] school on the West Coast, right?
 [19] A Yeah, I guess.
 [20] Q Do you know how well she did there?
 [21] A I don't, but I think she was a good student.
 [22] Q She graduated, right?
 [23] A Yes. She majored in psychology.
 [24] Q Do you think of Monica as a trustworthy person?
 [25] A I do, yes.

Page 111

[1] A It means grandmother, old lady, or something.
 [2] Q Do you know why she referred to her as The Babba,
 [3] why she gave her a nickname?
 [4] A Just for fun. No. Just for fun.
 [5] Q What did she say about Mrs. Clinton?
 [6] A I don't know. She never talked about her much.
 [7] Q Well, when she was referred to as The Babba, how
 [8] did that come up?
 [9] A I don't know. The Babba is out of town, or
 [10] something like that.
 [11] Q What would that mean?
 [12] A That would mean Hillary Clinton was out of town.
 [13] Q Would that be of special significance to Monica?
 [14] A Yes, because I think that's when she got invited to
 [15] go there, when his wife was not around.
 [16] MR. UDOLF: That's all I have.
 [17] BY MR. BINHAK:
 [18] Q You will be happy to know that Mr. Udolf asked some
 [19] of my questions.
 [20] A Okay.
 [21] Q I wanted to ask you some questions about Monica.
 [22] A Okay.
 [23] Q Monica grew up in Los Angeles, right?
 [24] A Yes.
 [25] Q Did you have any contacts with her when she was a

Page 114

[1] Q In your experience, is she an honest person?
 [2] A Yes.
 [3] Q In your experience, does she make things up or tell
 [4] stories or have fantasies?
 [5] A No, not really.
 [6] Q Well, let me ask you this question. Do you know
 [7] when Monica became interested in politics or in coming to
 [8] Washington?
 [9] A I think with her internship she became extremely
 [10] interested in politics and she became very knowledgeable.
 [11] Q Did she have an interest in politics and Washington
 [12] before she came to Washington?
 [13] A No.
 [14] Q So, that was something that was an opportunity that
 [15] came along?
 [16] A Right.
 [17] Q And that ignited her interests? Is that fair to
 [18] say?
 [19] A Yes.
 [20] Q Was Monica a supporter of President Clinton's?
 [21] A I don't know.
 [22] Q You don't know whether she was a Democrat or a
 [23] Republican, or whether she --
 [24] A She was in college at the time. I have no idea.
 [25] Q Once she started working at the White House, do you

Page 112

[1] younger child?
 [2] A Yes, I did.
 [3] Q What was she like as a younger kid?
 [4] A She was very outgoing and she was very strong-
 [5] willed, and she pretty much did what she wanted.
 [6] Q What were her interests?
 [7] A Her interests were drama. She was a beautiful
 [8] singer. She has a beautiful singing voice. Fashion. That's
 [9] it.
 [10] Q Did she have friends as a child?
 [11] A Yes.
 [12] Q A lot of friends?
 [13] A Uh-huh.
 [14] Q And did she do okay in school, or exceptionally
 [15] well?
 [16] A She did very well, I think, up until high school.
 [17] Q Did she participate in activities in school?
 [18] A Uh-huh.
 [19] Q So, would it be fair to say that she basically had
 [20] a pretty normal childhood?
 [21] A Yes.
 [22] Q You said up until high school she did pretty well.
 [23] Did she continue to do well in high school?
 [24] A I don't think so. I think in her last two years of
 [25] high school she didn't get very good grades.

Page 115

[1] know whether she was a supporter of the President's politics?
 [2] A Yes, she was.
 [3] Q When she left the White House and went to the
 [4] Pentagon, do you know if she supported the President's
 [5] policies?
 [6] A Yes, I think she did.
 [7] Q Do you know if she thought highly of the President
 [8] as a person?
 [9] A Yes, she did.
 [10] Q How do you know that? She told you?
 [11] A Yes.
 [12] Q You said just a couple of moments ago that you
 [13] considered Monica to be trustworthy and an honest person who
 [14] basically didn't make things up and didn't fantasize?
 [15] A Correct.
 [16] Q Did you believe Monica when she told you about
 [17] kissing the President?
 [18] A Yes.
 [19] Q Did you believe her when she told you about what is
 [20] called the sink incident?
 [21] A Yes, I believed her.
 [22] Q Did you have any reason not to believe her?
 [23] A No.
 [24] Q Did you believe her when she told you that the
 [25] President was calling her late at night at home?

Page 116

A Yes.
 Q Did you think that was strange that the President of the United States would call a 24-year-old woman at home?
 A Yes.
 Q Why is that? Why did you think that was strange?
 A Because he's married. That's why.
 Q Did you think it was strange just because a married man was calling her late at night, or --
 A Yes.
 Q -- did you think it was strange that the --
 A Well, yes.
 Q So, both?
 A Both things were very strange.
 Q What about the fact that he was a married man made you think it was strange that he was calling Monica late at night?
 A Because she's a single woman and he's a married man and I didn't think that was right.
 Q You didn't think it was appropriate?
 A Correct.
 Q Mr. Udolf asked you just a moment ago if you knew what they were talking about, and you said, no.
 A Right.
 Q You thought it was an inappropriate thing for him to be calling her and --

Page 119

(1) A Right.
 (2) C Now, you said that you had come to that conclusion based on what Monica Lewinsky was telling you about these visits.
 (3) A Right.
 (4) Q When you say the words "something was happening", what are you talking about? To what are you referring? What was the conclusion?
 (5) A Romantic relationship.
 (6) C A romantic relationship?
 (7) A (Witness nodded indicating an affirmative response.)
 (8) Q Did that have a physical component to it in your mind?
 (9) A It did not until she said that sink thing.
 (10) Q But it definitely had an emotional component to it?
 (11) A Yes.
 (12) Q Did you connect that to what was bothering Monica?
 (13) A You said that Monica was distressed and emotional and --
 (14) A Right.
 (15) Q -- somewhat depressed. Did you connect those two things?
 (16) A I think so, but I'm not sure it was -- yes. But also because of the way she was being treated by her coworkers and her superiors.
 (17)

Page 117

A Correct.
 Q -- she discussed with you the fact that he was calling her, but --
 A Right.
 Q -- you didn't discuss with her what they were talking about?
 A No.
 Q Not once?
 A Not that I can remember.
 Q Did you describe to her that you felt that it was inappropriate that a married man was calling her?
 A I may have. But I, I think I explained to you in the interview that when Marcia expressed her dismay at what was going on here, she clammed up and wouldn't tell Marcia anything else.
 So, Marcia said to me, could you just see what's going on when you talk to her; don't tell her you think this is disgusting; don't tell her how we feel about this, that there was phone calls and things going on.
 So, I did not say, oh, that's horrible, that's disgusting, he's awful. I did not. I just listened.
 Q Did your sister continue to tell Monica that she didn't approve of what was going on?
 A I'm sure from time to time she absolutely did.
 Q So, is it fair to say then that your role was more

Page 120

(1) Q Did the way she was being treated and her emotional state and moods, in conjunction with what she told you, did that lend credibility to what she was telling you about what was happening?
 (2) A Yes.
 (3) Q Did you personally ever tell Monica to break off contact with the President?
 (4) A I may have.
 (5) Q Did you tell her to break off contact, or did you express any opinion when she said that she was going to try to regain employment at the White House after the election?
 (6) A I don't think -- I didn't discourage her. I didn't say anything.
 (7) Q Did you believe that Monica was fairly characterized as a stalker?
 (8) A No.
 (9) Q Did the fact that other people were referring to her as a stalker make sense to you, in light of the relationship that you understood the President and Monica to have?
 (10) A Did I understand why they thought that, you mean?
 (11) Q Yes.
 (12) A I understood they thought that because they assumed it's her fault, or she, she is the one who is aggressively seeking to be near him.
 (13)

Page 118

to gather intelligence without passing judgment, and in that role Marcia Lewis asked you not to pass judgment so that you could continue to gather intelligence?
 A Yes.
 Q And then you would relay that information back to Marcia Lewis?
 A I wouldn't always tell her details.
 Q When you say you wouldn't tell her details, did you report back to her that the President was calling Monica at night?
 A I'm not sure. I don't remember. I may have. I don't know whether she knows or not. So, I don't know. Because we can't discuss this matter. So, I don't remember.
 Q Well, I'm not asking you whether she knows, because you can't really know what she knows. I'm asking --
 A Do I remember telling her?
 Q Yes. Do you remember --
 A I don't remember. I don't.
 Q Is that the kind of thing that you would have told her during that period of time?
 A Maybe, but I don't remember doing it.
 Q You had described before, in response to one of Mr. Emmick's questions, that something was happening -- that was the term you used -- between the President and Monica Lewinsky.

Page 121

(1) Q You said that Ms. McCoy was Big Red. Do you know why she was Big Red?
 (2) A Because she wears red lipstick and she has big red lips. And she has red hair.
 (3) Q Okay. When you spoke to Walter Kaye and he expressed the fact that the people at the White House were basically talking about this relationship and accusing Monica of being a stalker --
 (4) A Right.
 (5) Q -- is that before or after Monica had told you about the physical contact that she had with the President?
 (6) A Hmm. That's a good question. I'm -- I don't know exactly, I mean.
 (7) Q Is that the kind of thing that you would have told him?
 (8) A No. I don't think I told him that. No.
 (9) Q What would Monica do to prepare to see the President? You said you saw her on a few occasions to prepare to see the President. What would she do?
 (10) A Like blow-dry her hair, put on makeup.
 (11) Q Did she ever have a stylist come and do her hair in order to see the President or cut her --
 (12) A I read that.
 (13) Q -- hair especially?
 (14) A But I don't think so. She may have gone to the

Page 122

1 beauty parlor, but I don't think she had someone come there.
 2 MR. BINHAK: That's all I have.
 3 BY MR. EMMICK:
 4 Q I wanted to ask a couple of additional questions.
 5 One subject that we hadn't touched on was whether Monica
 6 Lewinsky talked to you at all about the Kathleen Willey
 7 situation.
 8 A Uh-huh.
 9 Q Did she have any conversations with you about
 10 Kathleen Willey?
 11 A You know, a long time, long, long time ago I
 12 remember that she said something about that, and it was very
 13 confusing. Something about Kathleen Willey, Linda Tripp. It
 14 made no impression on me. Yes, she said something. Long,
 15 long, long time ago.
 16 Q Long, long, as in a couple of years ago? Or as in
 17 the summer of last year?
 18 A Long before that, I think, like in the spring
 19 maybe. I don't know.
 20 Q The spring of '97, you mean?
 21 A Uh-huh. I think so. I don't know why I think
 22 that.
 23 Q Do you remember what it was at all that was
 24 confusing and --
 25 A No, no. Kathleen Willey, something-something.

Page 0

1 Linda Tripp. I don't know. Newsweek. Now, I guess I know
 2 what it is, but at the time it's like Greek. I didn't know
 3 what she's talking about.
 4 MR. EMMICK: Okay. Thank you.
 5 THE WITNESS: That's all?
 6 MR. EMMICK: That's it.
 7 (Whereupon, at 6:06 p.m., the proceedings were
 8 concluded.)
 9 * * * * *
 10 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC
 11 I, Elizabeth A. Eastman, the officer before whom
 12 the foregoing deposition was taken, do hereby certify that
 13 the witness whose testimony appears in the foregoing
 14 deposition was duly sworn by me; that the testimony of said
 15 witness was taken by me electronically and thereafter reduced
 16 to typewriting by me; that said deposition is a true record
 17 of the testimony given by said witness; that I am neither
 18 counsel for, related to, nor employed by any of the parties
 19 to the action in which this deposition was taken; and,
 20 further, that I am not a relative or employee of any attorney
 21 or counsel employed by the parties hereto, nor financially or
 22 otherwise interested in the outcome of the action.
 23
 24 NOTARY PUBLIC FOR THE
 25 DISTRICT OF COLUMBIA
 My Commission Expires:

copy generated 3/10
for use at deposition
CWE



Office of the Independent Counsel

1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004
(202) 514-8688
Fax (202) 514-8802

March 16, 1998

Steve Gordon
Holland & Knight
2100 Pennsylvania, NW
Washington, D.C. 20037

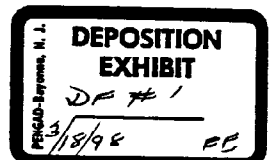
By Mail and Facsimile (202) 955-5564

Re: Cooperation/Immunity Agreement, Debra Finerman

Dear Mr. Gordon:

The purpose of this letter is to set forth the terms of the cooperation/immunity agreement that has been reached between the Office of Independent Counsel and your client, Debra Finerman.

Let me first summarize the background of the agreement. As you know, we are investigating whether Monica Lewinsky and/or others committed perjury, suborned perjury, obstructed justice, intimidated witnesses, or otherwise violated federal law in dealing with witnesses, potential witnesses, or others concerning the civil case Jones v. Clinton. Our Office determined that your client has information relevant to that investigation, and last month we asked to interview your client. You indicated that your client, based upon your advice, would invoke her Fifth Amendment right not to be compelled to incriminate herself, and you asked whether our Office would offer her immunity from prosecution. Our Office indicated we would consider offering such immunity. However, we would need to conduct an in-person proffer-interview of your client in order to obtain sufficient facts to determine whether immunity was appropriate in view of the information she possesses, and in view of any role she may have played in the events we are investigating. The terms of the proffer agreement were set forth in a letter from our Office dated February 19, 1998. We conducted the proffer-interview on February 21, 1998.



We have reviewed your client's proffer, and we have determined that, in order to provide the grand jury with the benefit of the information possessed by your client, it is appropriate to offer her immunity in exchange for her truthful, complete, and candid cooperation with our investigation.

Let me clarify the terms of this cooperation/immunity agreement. On her part, your client agrees to cooperate fully with the United States, including agents of the Federal Bureau of Investigation (FBI) and any other law enforcement agencies the United States may require. This cooperation will include the following:

1. Ms. Finerman will provide truthful, complete, and accurate information to the United States. She will provide, upon request, any documents, records, or other tangible evidence within her custody and control relating to the matters about which she is questioned. She will assist the United States in gaining access to such materials that are not within her custody and control, and she will assist in locating and gaining the cooperation of other individuals who possess relevant information. She will not attempt to protect any person or entity by providing false information or omitting relevant information, and she will not attempt to implicate any person or entity falsely.

2. Ms. Finerman will testify truthfully before grand juries in this district and elsewhere, at any trials in this district and elsewhere, or in any other proceeding, as the United States may require. Neither she nor her agents will explicitly or implicitly, directly or indirectly, contradict this truthful testimony or the information she has provided to this Office in any setting, including news interviews, books, articles, speeches, or other public statements.

3. Ms. Finerman will consent to interviews conducted by the United States, including attorneys, law enforcement agents, and representatives of any other institutions the United States may require. She will make herself available for these interviews upon request and reasonable notice. The subjects about which Ms. Finerman will cooperate include all subjects within the scope of our investigation.

4. Ms. Finerman will submit to a polygraph examination upon request by the United States.

5. Ms. Finerman will waive all privileges, without limitation, except as to your representation of her and as to her communications with her husband.

If your client fully complies with the terms of this agreement, our Office promises not to prosecute her for any crimes committed prior to the date of this agreement, arising out of the events we are investigating. That is, your client will have "transactional immunity" from prosecution by this Office.

If our Office determines that Ms. Finerman has intentionally given false, incomplete, or misleading information or testimony, or has otherwise violated any provision of this agreement, this agreement shall be null and void. Your client will then be subject to prosecution for any criminal violation of which this Office has knowledge, including but not limited to perjury, obstruction of justice, and making false statements to federal agencies. In such a prosecution, any statements or other information provided by your client in the course of her cooperation or her proffer may be introduced against her.

If the terms of this cooperation/immunity agreement are acceptable, please sign, and have your client sign, in the spaces provided below.

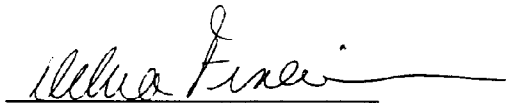
Sincerely,



MICHAEL W. EMMICK
Associate Independent Counsel



Steve Gordon
Counsel for Debra Finerman



Debra Finerman

FAX TRANSMISSION

FOR: MRS MARCIA LEWIS

FROM: Debra Finerman

Amount: 5099.00

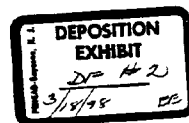
2 pages incl.


824-DC-0000010

15/02 '97 15:30

TX/RX NO.2122

P.001



<p>AND OUR LOVE ALWAYS HAND, I got the message of your dancing, I'm not sure who's O U at 7, Love Ya, Guess Who</p>	<p>MY AMERICA, THE BIG H AND THE LIFE WE LIVE IN celebrate with a former group and DDT's group!</p>	<p>PLEASE BE MY VALENTINE I love you, JCHL</p>	<p>HEY VALENTINES D.J. Cassin's, D.J. Cassin's Adam and Benji Love, Bill DeD</p>	<p>MONIE Y DOLL YOU I HAD ONE WORD U.S. YOU I HAD ONE WORD U.S.</p>
<p>WAL - whether I'm your Pal or your GUY I'm all yours</p>	<p>HAPPY VALENTINE'S DAY MICKY I'm VALENTINE'S WHIP, I'm so confident as you please to care about me, Hugh & Pigeon BCTM</p>	<p></p>	<p></p>	<p></p>

824-DC-0000012

15/02 '97 15:30

TX/RX NO.2122

P.002

Dear Monica -

This is some of your stuff

I drycleaned -

Ready tomorrow -

Love,

MSL-DC-00000456

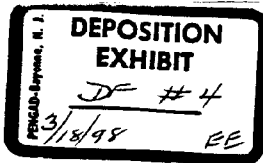
Mom

* Marsh - Monica was called to the White House
9:30 this a.m. She'll take a plane to N.Y.

See you

at temple

We have tickets you



- 1 -

(2/1/98

1. Ms. Lewinsky had an intimate and emotional relationship with President Clinton beginning in 1995. At various times between 1995 and 1997, Ms. Lewinsky and the President had physically intimate contact. This included oral sex, but excluded intercourse.
2. When asked what should be said if anyone questioned Ms. Lewinsky about her being with the President, he said she should say she was bringing him letters (when she worked in Legislative Affairs) or visiting Betty Currie (after she left the WH). There is truth to both of these statements.
3. After Ms. Lewinsky was informed she was being transferred to the Pentagon, Mr. Clinton told her that a) he promised to bring her back to the WH after the election and (in a subsequent conversation) b) Evelyn Lieberman spearheaded the transfer because she felt the President paid too much attention to me and vice versa. Ms. Lieberman told the Pres. that she didn't care who worked there after the election, but they needed to be careful until then.

After the election, Ms. Lewinsky asked the Pres. to bring her back to the WH. In the following

-2-

Months, Mr. Clinton told Ms. Lewinsky that Bob Nash was handling it and then Marsha Scott became the contact person. Ms. L met with Ms. Scott twice. In the second meeting, Ms. Scott told Ms. L she would detail her from the Pentagon to her (Ms. Scott's) office, so people could see Ms. L's good work and stop referring to her as "The Stalker." Ms. Scott told Ms. L they had to be careful and protect the Pres. Ms. Scott later rescinded her offer to detail Ms. Lewinsky to her office.

Ms. Betty Currie asked Mr. John Podesta to take over placing me in the WH. Three weeks after that, Ms. Linda Tripp informed Ms. L that a friend of Ms. Tripp's in the NSC, Kate, had heard rumors about Ms. L; Ms. L would never work at the WH with a blue pass; and suggested to Ms. Tripp that Ms. L leave Washington, DC.

Following this conversation, Ms. Lewinsky requested of the Pres. that he ask Vernon Jordan to help secure her a non-government position in NY. He agreed to ask Mr. Jordan.

In an effort to help Ms. L., Ms. Currie asked Mr. Podesta to assist, as well. Ms. L believes that

the Pres. ~~and~~ spoke with Mr. Erskine Bowles regarding Ms. L's employment in NY. Mr. Podesta arranged for Ms. L to interview with Amb. Richardson who later offered Ms. L a position in Communications/ Public Affairs at the USON.

In the beginning of November 1997, Ms. L met with Mr. Jordan. He asked Ms. L why she was there to see him. Ms. L explained to him (in more detail) that she and the Pres. were friends and people got the wrong idea, resulting in Ms. L's banishment to the Pentagon. Ms. L said she was seeking Mr. Jordan's help to begin a new life; he agreed to help.

Ms. L met again with Mr. Jordan in the beginning of December '97, at which time he provided Ms. L with a list of three people to contact and suggested language to use in her letters to them. At some point, Mr. Jordan remarked something about Ms. L being a friend of the Pres. of the United States. Ms. L responded that she never really saw him as "the President"; she spoke to him like a normal man and even got angry with him like a normal man. Mr. Jordan asked what Ms. L got angry about. Ms. L replied that the Pres. doesn't see or call her enough. Mr. Jordan said

Ms. L should take her frustrations out on ~~the~~ him -- not the President.

The following week Ms. L had two interviews in NY ~~as a result~~ ^{in response to} of her letters.

4. After Ms. Lewinsky was informed, by the Pres., that she was identified as a possible witness in the Jones case, the Pres. and Ms. L discussed what she should do. The Pres. told her ~~to~~ he was not sure she would be subpoenaed, but in the event that she was, she should contact Ms. Currie. When asked what to do if she was subpoenaed, the Pres. suggested she could sign an affidavit to try to satisfy their inquiry and not be deposed. In general, Ms. L should say she visited the Wt to see ~~B~~ Ms. Currie and, on occasion when working at the Wt, she brought him letters when no one else was around. Neither of those statements untrue. To the best of Ms. L's memory, she does not believe they discussed the content of any deposition that Ms. L might be involved in at a later date.

-5-

5. After receiving a subpoena two days later, Ms. L contacted Mr. Jordan (because Ms. Currie's brother had been killed in a car accident). Mr. Jordan told Ms. L to come see him ~~that~~ at 5 pm because he couldn't understand Ms. L through ~~her tears~~ on the phone, through her tears. Upon Ms. L's request, Mr. Jordan arranged an appointment for her with an attorney, Mr. Frank Carter.

Ms. L expressed ~~any~~ anxiety with respect to her subpoena requesting the production of any gifts from the Pres., specifically citing hat pins which the Pres. had in fact given her. Mr. Jordan allayed her concerns by telling her it was standard language. Mr. Jordan asked Ms. Lewinsky two questions: Did you have sex with the Pres. and/or did he ask you for sex? ~~Ms. L~~ Ms. L responded to both questions with "no."

Possibly later in that meeting but more probably the next meeting, Ms. L ~~was~~ tried to make it clear to Mr. Jordan that she, in fact, did have a physically intimate relationship with the Pres. On ~~more than one occasion~~ ~~Ms. L~~ expressed ~~concern about signing an affidavit~~

-6-

Ms. L made it clear she intended to deny the sexual relationship with the Pres.

On the day Mr. Jordan drove Ms. L to Mr. Carter's office, she showed Mr. Jordan the items she was producing in response to the subpoena. Ms. L believes she made it clear this was not everything she had that could respond to the subpoena, but she thought it was enough to satisfy ~~and still~~ ~~himself~~. Mr. Jordan made no comment about whether or not ^{what} ~~was~~ Ms. L brought was right or wrong. Mr. J drove Ms. L to Mr. Carter's office; introduced them; and left.

6. The Pres., through Ms. Currie, invited Ms. L to come see him to get her Christmas presents. They played with Buddy, he gave her the presents, they ~~spoke~~ talked casually and spoke for a few minutes about the case. Ms. L asked him how he thought the Pa attorneys for Paula Jones found out about her. He thought it was probably "that woman from the Summer... with Kathleen Wilkey" (Linda Tripp) who lead them to Ms. L or possibly the uniformed agents. He shared Ms. L's concern about the hat pin. He asked Ms. L if she had told anyone that he had given it to her and she replied, "no."

-7-

Ms. L then asked if she should put away (outside her home) the gifts ~~she~~ he had given her or, maybe, give them to someone else. ~~But~~

[Ms. Currie called Ms. L later that afternoon as said that the Pres. had told her ~~Ms. L~~ wanted her to hold onto something for ~~her~~. ~~Ms. L~~ boxed up most of the gifts ^{she} had received and gave them to Ms. Currie. It is unknown if Ms. Currie knew the contents of the box.]

Ms. L told the Pres. she was planning to sign an affidavit. When Ms. L and the Pres. discussed when Ms. L was moving to NY, the Pres. thought it might be possible that they would not seek her deposition if she was in NY.

7. Ms. Lewinsky called Mr. Jordan several times concerning her employment in NY. When she called one day especially concerned about the case, Mr. Jordan suggested they meet for breakfast.

At breakfast, Ms. L expressed concern about Ms. Tripp saying she (Ms. L) had trusted her before, but was now suspicious of her.

- 8 -

Ms. L said Ms. Tripp may have seen notes when she was in Ms. L's home. Mr. Jordan asked if the notes were from the Pres. Ms. L said that they were notes to the Pres. Mr. Jordan suggested to Ms. L she check to make sure they are not there (something to that effect). Ms. L interpreted that to mean she should get rid of whatever is there.

~~On the~~

In the car on the way to his office, Ms. L asked Mr. Jordan if he thought the Pres. would always be married to Mrs. Clinton.

Mr. Jordan replied that he thought they would always be married, as they should be. ~~to~~ as Ms. L expressed disappointment and then Mr. Jordan said, "well, maybe you two will have an affair when he's out of office."

Ms. L replied that she and the Pres. had already had an affair minus having sex, -- but it included everything else. Ms. L believes they did not get into any more detail.

-9-

After Ms. L received the draft of the affidavit, she called Mr. Jordan to ask that he look it over before she signs it. He instructed her to drop off a copy at his office. They spoke later by phone about the affidavit agreeing to make some changes.

That evening, Ms. L placed a phone call to Ms. Currie asking her to tell the Pres. that she wanted to speak with him before she signed something the next day. He returned Ms. L's call a few hours later. Ms. L told him Mr. Carter had asked her some sample questions that might be asked of her in the deposition and she didn't know how to answer them. Furthermore, she was concerned that if the answers involved naming people in the WH who didn't like her they would try to screw her over. Ms. L asked him how she should respond to the question, "How did you get your job at The Pentagon?" He replied "The people in Legislative Affairs helped you." This is, in fact, part of the truth -- but not the whole truth. The Pres. told Ms. L not to worry about the affidavit as he had seen 15 others.

9. Ms. L started to become wary of Ms. Tripp in the beginning of Dec. 1997, when Ms. Tripp told Ms. L she had received a subpoena in the Jones case and if asked about Ms. L or others, she would divulge all she knew.
10. Ms. L had a physically intimate relationship with the President. Neither the Pres. nor Mr. Jordan (or anyone on their behalf) asked or encouraged ~~me~~^{Ms. L} to lie. ~~she~~^{Ms. L} was comfortable signing the affidavit with regard to the "sexual relationship" because she could justify to herself that ~~they~~ she and the Pres. did not have sexual intercourse.
11. At some point in the relationship between Ms. L and the President, the President told Ms. L to deny a relationship, if ever asked about it. He ^{also} said something to the effect of if ~~the~~ the two people who are involved say it didn't happen -- it didn't happen. ~~When~~ Ms. L knows this was said some time prior to the subpoena in the Paula Jones case.
12. Item #2 above also occurred prior to the subpoena in the Paula Jones case.

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 3/22/98

JAY KERRY FOOTLIK, white male, date of birth [redacted], place of birth [redacted], Social Security Account Number [redacted], home address, [redacted], home telephone number [redacted], Vice President, RUDER-FINN, was apprised of the official identities of the interviewing Agents and the nature of the interview. FOOTLIK was interviewed at the office of his attorney, DARREN BERNHARD, HOWREY & SIMON, who was also present for the interview. FOOTLIK provided the following information:

FOOTLIK graduated from the University of California at Los Angeles (UCLA), School of Law, in December of 1994. In 1992, FOOTLIK worked in the Los Angeles office of the CLINTON/GORE Presidential Campaign. During 1992, FOOTLIK met MONICA LEWINSKY at a Century City Mall tie store, where LEWINSKY was employed. LEWINSKY gave FOOTLIK advise on ties and they spoke generally about politics. LEWINSKY asked for, and received, FOOTLIK's telephone number, and they stayed in sporadic contact.

FOOTLIK moved to Washington, D.C., after the 1992 Presidential Election. FOOTLIK worked on the Presidential transition under CRAIG SMITH. After the Inauguration, FOOTLIK worked for the Democratic National Committee in Washington, D.C. In August of 1994, FOOTLIK moved to the White House, in the Office of Presidential Personnel under CRAIG SMITH. FOOTLIK's interaction with LEWINSKY, up to this point, was sporadic.

At one point, in 1994 or 1995, LEWINSKY called FOOTLIK inquiring about internships at the White House. FOOTLIK advised LEWINSKY about the Intern Office in the White House. Sometime after LEWINSKY began her internship at the White House, LEWINSKY mentioned that WALTER KAYE had helped get LEWINSKY the internship. LEWINSKY also mentioned that someone in her family had a place at the Watergate Apartments, and that LEWINSKY would be staying there.

When LEWINSKY was an intern and a staff member, LEWINSKY would call or stop by FOOTLIK's office at the Old Executive Office Building (EOOB). FOOTLIK thinks LEWINSKY felt FOOTLIK was more of a friend than he felt of her. FOOTLIK did

Investigation on 3/19/98 at Washington, DC File # 29D-OIC-LR-35063

by SA [redacted]
SA [redacted] Date dictated 3/22/98

[redacted]

29D-OIC-LR-35063

Continuation of OIC-302 of JAY KERRY FOOTLIK, On 3/19/98, Page 2

not socialize with LEWINSKY outside of work. FOOTLIK and LEWINSKY went to lunch a couple of times in the OEOB cafeteria.

Sometime after the assassination of Israeli Prime Minister YITZACH RABIN, LEWINSKY came to FOOTLIK and mentioned she had a Christmas present she wanted to give the President.

FOOTLIK suggested LEWINSKY send the gift through the regular inter-office mail. LEWINSKY was more insistent in giving the gift to the President in person. LEWINSKY asked FOOTLIK to walk her over to the West Wing, as she did not have a pass that would allow her to walk unescorted into the West Wing. FOOTLIK did not want to walk to the West Wing without an official purpose, so he kept putting LEWINSKY off.

Shortly thereafter, FOOTLIK had a reason to go to the West Wing. He told LEWINSKY this, and the two walked to the West Wing together. FOOTLIK wanted to give CLINTON a button that memorialized CLINTON's eulogy to RABIN. When LEWINSKY and FOOTLIK got to the West Wing, a birthday party was being held in the anteroom of the Oval Office. CLINTON was at the party, and FOOTLIK gave the button to CLINTON at that time. LEWINSKY then gave CLINTON the tie. FOOTLIK left CLINTON and LEWINSKY standing in the hall, as FOOTLIK mingled at the party. FOOTLIK visited at the party for a couple of minutes.

FOOTLIK then told LEWINSKY he had to get back to the OEOB, but LEWINSKY did not want to go. FOOTLIK felt obligated to escort her back because he had brought her to the West Wing. LEWINSKY acquiesced and left with FOOTLIK. FOOTLIK recalls the White House photographer being present when he was meeting with CLINTON, and believed a photograph existed of this meeting.

LEWINSKY seemed to enjoy her position at the Office of Legislative Affairs. Around the time of LEWINSKY's transfer from the White House, LEWINSKY called FOOTLIK very upset. LEWINSKY mentioned to FOOTLIK that she was perceived as being chatty or talkative. LEWINSKY never mentioned concerns about EVELYN LIEBERMAN. LEWINSKY never mentioned being described as a "stalker" or a "clutch." FOOTLIK remembers LEWINSKY mentioning her job at the Pentagon the day she told him she was being transferred. FOOTLIK was not surprised LEWINSKY was transferred.

29D-OIC-LR-35063

Continuation of OIC-302 of JAY KERRY FOOTLIK, On 3/19/98, Page 3

After LEWINSKY left the White House, FOOTLIK had little contact with her. At one point, LEWINSKY asked FOOTLIK to dinner. FOOTLIK went to dinner with LEWINSKY to be nice. LEWINSKY mentioned her job at the Pentagon, the travel related to the job, and other general topics. LEWINSKY seemed to be happy at her job and never mentioned coming back to the White House.

In July of 1997, FOOTLIK met LEWINSKY, by chance, at the Pentagon City Mall. FOOTLIK and LEWINSKY spoke for approximately thirty seconds.

When the news about LEWINSKY broke in January of 1998, FOOTLIK called CRAIG SMITH at the White House and told him what he knew of LEWINSKY. A week or so later, DAVID KENDALL called FOOTLIK and interviewed FOOTLIK about the LEWINSKY matter. FOOTLIK advised the interview encompassed everything FOOTLIK has discussed in his interview with the Federal Bureau of Investigation (FBI), documented in this FD-302.

FOOTLIK never met KATHLEEN WILLEY.

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/9/98

LEWIS C. FOX, White male, born October 23, 1943, Social Security Account Number [REDACTED], was interviewed at his residence, [REDACTED], telephone [REDACTED], at which time he was immediately advised of the identity of interviewers and the purpose of the interview. FOX provided the following information:

FOX retired from the Uniform Division of the U.S. Secret Service, White House Detail, on January 4, 1997, after 27 years and 3 months of service. FOX usually worked a normal shift from 4:30 a.m. to 1:00 p.m., but frequently worked overtime until 6:30 p.m. some evenings. FOX worked many weekends. When the news services were mentioning the name of MONICA LEWINSKY almost constantly last week, FOX was asked by some of his friends, who gather at a restaurant in Waynesburg, whether he knew LEWINSKY. He replied that he did, and this apparently resulted in one of them notifying News Channel 11 in Pittsburgh, who requested an interview. FOX was interviewed at his home several days ago.

FOX received a call from First Name Unknown (FNU) JACKSON of the Bureau of Public Affairs, of the Secret Service in Washington, earlier in the day. FNU JACKSON inquired whether he was going to grant any more interviews and, after some kidding around, FOX replied that he was not. JACKSON advised him that as a result of the television interview he may get subpoenaed. FOX said that he had nothing to hide, and was willing to provide any information that did not affect the security of the President.

FOX first met MONICA LEWINSKY when he was on duty at the Control Point in the basement of the West Wing of the White House. LEWINSKY was wearing an "I" badge, indicating that she was a White House intern, and was accompanied by another young lady who was introduced as a friend from California. MONICA stated that she wanted to take her friend, who had a visitor's badge, upstairs for a limited tour of several rooms. FOX pointed out SUSAN LEVINE, of the Democratic National Committee, who was about to escort several persons from Arkansas on a private tour. LEVINE agreed to take MONICA's friend, and MONICA agreed to wait at the Control Point for her to return. A few minutes later the Vice President came downstairs and passed by, going across the

Investigation on 2/6/98 at Waynesburg, Pennsylvania File # 29D-OIC-LR-35063
 by CI [REDACTED]
SA [REDACTED] Date dictated 2/6/98

29D-OIC-LR-35063

Continuation of OIC-302 of LEWIS C. FOX, On 2/6/98, Page 2

street. Then the President passed by on his way to the Executive Office Building and waved at FOX, MONICA, and the other officers. The tour returned and the President stopped by on his return from EOB and shook their hands and had his photograph taken with the visitors from Arkansas. The President also took a photograph with MONICA, but it did not appear that he knew her at that time. FOX explained that MONICA could obtain an autographed copy of the photo by making a written request. This made MONICA very happy and she inquired, "LEW, do you like chocolates?" FOX replied that he did.

About one week later MONICA called him at his post from downstairs in the White House and came up to see him. MONICA thanked him for his helpfulness in obtaining the photograph with the President and gave him a box of Godiva chocolates. Thereafter, FOX's fellow workers would always refer to MONICA as "your girl" whenever she was seen in the West Wing. FOX explained that this was their way of kidding him, but that he had no social or outside relationship with LEWINSKY. After the chocolate affair, FOX would periodically see LEWINSKY in the Executive Office Building or in the halls and they would always speak to each other. Several weeks later MONICA said that she was getting a permanent pass to the West Wing, after she obtained a paying job in the Congressional Offices in the East Wing. FOX remarked that MONICA had obtained a job much quicker than most of the interns that he has known.

FOX soon started seeing MONICA carrying file folders from the Executive Office Building to BETTY CURRIE's office in the West Wing. FOX stopped by MONICA's office several times to say hello. MONICA always appeared to be very busy.

FOX stated that he was on duty outside the Oval Office on a Saturday or a Sunday, probably about 12:30 p.m. or 1:30 p.m., with a Secret Service Agent when the President opened the door and asked "Have you seen a young congressional staff member?" and he and the Agent replied that they had not. The President said, "I'm expecting one." FOX stated to the Agent, whose name he does not recall, "I'll bet it's MONICA." About ten minutes later MONICA LEWINSKY showed up with some letters for the President. Either FOX or the Agent knocked on the door of the Oval Office and the President said "Yes" and opened the door of the Oval Office. MONICA walked into the Oval Office and the

29D-OIC-LR-35063

Continuation of OIC-302 of LEWIS C. FOX, On 2/6/98, Page 3

President said "She'll be here awhile" and the door was closed. This occurred on a Saturday or a Sunday, month unrecalled. A nearby television set had a football game on, which they were intermittently watching. MONICA was in the office for an hour or more.

On one other occasion, on a Saturday or Sunday afternoon, FOX was down the hall from the Oval Office and observed LEWINSKY come out of the Oval Office, but he did not observe her enter. This occurred in the afternoon, time unknown. MONICA returned to the East Wing but did not see FOX.

Fellow officers began remarking that LEWINSKY was making regular appearances on weekends at the Oval Office. Some officers working the Oval Office Detail would say, "Your girl came here again." An officer senior to FOX said to him "There's something you might want to know" and the officer, GARY BYRNE, related that he had told a White House staff member that LEWINSKY was making a lot of trips to the Oval Office. Very soon thereafter, BYRNE was apparently called at home by EVELYN LIEBERMAN who wanted to talk to him right away. BYRNE agreed to meet with her at the beginning of his next regular shift and advised her of his observations. Within a week FOX saw MONICA with tears in her eyes in the hallway, and she said, "I don't work here anymore, I'm going to the Pentagon."

FOX saw LEWINSKY at the Oval Office or with the President on these three occasions. FOX cannot recall the dates of these sightings, and his personal diaries do not have notations of these events. The diaries for 1995 and 1996 do indicate the dates and hours that FOX worked. The scheduling department of the Secret Service at the White House would reflect the names of fellow workers on shift with FOX. MONICA did not have any real confidants or friends that FOX was aware of, as she was usually alone. FOX never observed any physical contact between MONICA and the President.

FOX observed HILLARY RODHAM CLINTON come to the Oval Office about three times, but she did not stay long. NANCY Last Name Unknown (LNU) controlled the flow and timing of the visitors to the Oval Office. BETTY CURRIE was always friendly, but did not visit with FOX until his final return before retirement.

29D-OIC-LR-35063

Continuation of OIC-302 of LEWIS C. FOX, On 2/6/98, Page 4

FOX stated that the only person who would enter the Oval Office unannounced when the President was there would be the steward. This would occur because the President had requested coffee or something from the kitchen. FOX had occasion to go into the study behind the Oval Office, as this was a function of the guards before the President arrived at the office. The officers would inspect the room to insure that nothing had been disturbed. Sometimes they entered after the President departed to turn out the lights. The study contained a small sofa similar to a love seat, a small stand, and possibly a bookcase. FOX did not know for what purpose the President used the study, but some past Presidents took rest breaks there.

FOX recently learned of a story, from the media, that the President had been caught in a compromising position in the theater by a staff member. FOX had never heard this story and did not know if it had any validity.

The President only went into the theater to practice speeches or to watch movies. FOX never heard other Secret Service employees discuss any incident occurring in the projection room of the theater. Access to the theater would always be observed by at least one, and possibly two, of the guard force.

Lewis Fox, 2/17/98

Grand Jury

Page 1 to Page 77

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL

1001 Pennsylvania Avenue, N.W.

Suite 490-North

Washington, DC 20004

Phone: 202-514-8688

FAX: 202-514-8802

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 17, 1998

The testimony of LEWIS C. FOX was taken in the
presence of a full quorum of Grand Jury 97-2, impaneled on
September 19, 1997, commencing at 10:05 a.m. before:

SOLOMON WISENBERG

STEPHEN BINHAK

MARY ANNE WIRTH

ROBERT BITTMAN

Associate Independent Counsel

Office of Independent Counsel

1001 Pennsylvania Avenue, N.W.

Suite 490 North

Washington, D.C. 20004

Page 2

Whereupon,

LEWIS C. FOX

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

EXAMINATION

BY MR. BITTMAN:

Q Can you please state your name?

A My name is Lewis C. Fox.

Q And where do you live, Mr. Fox?

A I live in Waynesburg, Pennsylvania, RD 3, Box 158.

Q And how long have you lived there?

A I retired on January the 4th, 1997. I was there on

January the 3rd, 1997.

Q And from where did you retire?

A The United States Secret Service Uniformed

Division.

Q How long were you with the Secret Service?

A Twenty-seven years and three months.

Q Let me advise you of certain rights and obligations

you have. You are appearing here today before this grand

jury as a witness. You do, however, have certain

obligations.

You have an obligation to tell the truth. If you

Page 4

e or intentionally mislead this grand jury, you may be
prosecuted for that. Do you understand that?

A Yes, sir, I do.

Q You also understand you have a right to have an
attorney present with you today outside the grand jury room,

and you may consult with that attorney at reasonable times.

Do you understand that?

A Yes, sir.

Q Do you have an attorney with you today?

A Yes, sir, Mr. Mike Leibig.

Q How do you spell his last name?

A Make sure it's right. (Examining) It's

L-e-i-b-i-g.

Q You also understand that if an answer to one of the

questions I ask may incriminate you, you do not have to

answer. You may assert your Fifth Amendment privileges and

not answer the question. You understand that?

A Yes, sir.

Q Okay. As a member of the Secret Service, you and

your attorney and I have spoken. You are going to testify

today about certain matters, certain observations you made

while a Secret Service Agent at the White House. Do you

understand that?

A Yes.

Q Okay. This office -- I and others from my office

Page 5

have talked to the United States Secret Service, which is
under the Department of the Treasury. We've also spoken to
attorneys with the Department of Justice, and we have come to
an agreement about your testimony today, and that is, that we
will not ask any questions the answer to which would reveal
the protective techniques or procedures of the Secret
Service.

A Yes, that's correct.

Q That's your understanding as well?

A Yes, sir.

Q Okay. So please do not reveal any protective
techniques of the Secret Service, and this would include any
armaments or other things of that nature. Do you understand
that?

A Yes, sir.

Q Okay. You worked for the Secret Service for 27-
and-some years.

A Twenty-seven years, three months.

Q Twenty-seven years, three months. What did you do
for the Secret Service?

A Well, I was an officer -- I was a training officer,

which the new recruits would come in. I would give them

three weeks of undivided attention as far as training of the

White House area, again -- or the alarm systems, how to get

people into the buildings.

Page 6

And these would be anywhere from 12 to 15 people
that would be my group of people I'd be working with. They
would stay with me from the time that they came on. I'd work
a week of day work with them, a week of afternoon, and then
-- then they would be turned over to the midnight training
officer.So then I would come back and take midnight
training people that had worked midnights and bring them
under my wing and take them around the White House complex,
explaining the operation of the White House and how things
are run at the White House.

I also was an advance officer, which would deal

with the metal detectors for protection of the president. I

traveled to Australia, Singapore, and Japan with President

Bush. I was in Canada with President Reagan. I was in

Austria -- or Australia -- not Australia, but Brasilia,

Brasilia and countries like that with other presidents.

Again, my responsibility was to go out, meet with

the agents in charge. They would give me an area where the

president was going to be. Our job was to set up the metal

detectors, meet the officers that were coming in on military

planes or commercial planes, get them to their hotels, get

them in their rooms, transport them to and from the sites,

and then take them -- when the detail ended, take them back

to the plane, and then I'd tie up any loose ends that was in

Page 7

the event and go there.

Also, I did the Pope when he was in L.A. Coliseum,
which was a big detail, so --Basically, I've traveled the country, doing metal
detectors, training, and stuff like that.Q Am I correct that the Secret Service is a law
enforcement agency?

A I will say that the Uniformed Division, and we're

talking about Uniformed Division, is a law enforcement

division. They have the same power in the District of

Columbia as the Metropolitan Police, the Park Police. They

have the same arrest powers.

The Secret Service itself I would not basically say

that they are a law enforcement. They're more of a

protective type dealing with, again, the president, vice

president, again, everybody who's counterfeiting. They come

under the Treasury Department. And they're not really out

there fighting crime, such as could happen in the Uniformed

Division.

Q Have you always worked at the White House in your
27 years?

A Twenty-seven years, yes.

Q Have you ever made any arrests?

A Yes.

Q How many?

Page 8

12 five A Well, probably no more than five. No more than
 13 Q Have you ever testified in court?
 14 A I've been called but never testified because the
 15 case was dropped.
 16 Q Okay.
 17 (Grand Jury Exhibit No. LF-1 was
 18 marked for identification.)
 19 BY MR. BITTMAN:
 20 Q Let me show you what's been marked as a grand jury
 21 exhibit. It's marked as LF-1. It was previously LP-1.
 22 Everyone, I understand, has their own copy of that.
 23 I'm handing you a red pen to mark the exhibit. Do
 24 you recognize the exhibit?
 25 A Yes, I do.
 26 Q What is it?
 27 A It is an outline of the West Wing of the White
 28 House, press area, swimming pool. I can't make out -- this
 29 is kind of blurry here. I'm not sure what -- on the bottom
 30 here what --
 31 Q The bottom right --
 32 A Yeah, I can't -- it's blurry --
 33 Q -- where it says something Terrace?
 34 A Terrace. That would be on top of the West Wing,
 35 press area, former pool area.

Page 9

11 Q Are you familiar with the West Wing of the White
 12 House?
 13 A For 27 years I was familiar with it.
 14 Q Okay. Is this an accurate diagram? Does it appear
 15 to be an accurate diagram?
 16 A Yes, it appears to be an accurate diagram, except
 17 the room numbers -- I could tell you what was in the rooms,
 18 but as stated on here, the room numbers are not familiar with
 19 me. I could tell you the offices. I never knew them as Room
 20 117, 118. I knew them as basically another -- an office.
 21 Q You continued to be a uniformed officer in the
 22 Secret Service during President Clinton's presidency; is that
 23 correct?
 24 A That's correct.
 25 Q Okay. How often would you be in the West Wing
 26 during President Clinton's presidency?
 27 A Well, we can talk about -- I was there quite a bit
 28 because at one time during his first -- first time, I was
 29 unassigned, so I was at the mercy of the assignments office,
 30 which, if they needed me there, they'd put me in the West
 31 Wing.
 32 It was a basic -- I was unassigned Monday through
 33 Friday, so I was -- I was just plugged in anywhere. I was a
 34 utility player. As many of you might know in a baseball or
 35 something like that, special teams player, I would be just

Page 10

11 plugged in wherever there's a vacancy. Because of my
 12 seniority, a lot of times I would be put into the West Wing.
 13 Q Did you have a regular assignment?
 14 A Well, my regular assignment -- I had a regular
 15 assignment through a time where it was Monday through Friday,
 16 and then I got bumped out of that, went back to an unassigned
 17 assignment, where, again, I was at the mercy of the
 18 assignments.
 19 But in 1995 I was unassigned until like October,
 20 when one of the officers was injured in New York City, and I
 21 took over his assignment, which was a permanent assignment,
 22 which I would go to the same assignment every day. And I
 23 held that assignment up until he came back like in March or
 24 April of '96.
 25 Q And what was that normal assignment?
 26 A The normal assignment was ellipse parking behind
 27 the White House. If anybody knows where the national
 28 Christmas tree is, it would be -- my job would be in there to
 29 keep the tourists out, and any unauthorized person that was
 30 not -- did not have a permit, I'd have to run them out, get
 31 them out, you know.
 32 MR. BITTMAN: Please note for the record Mr. Binhak
 33 has reentered the grand jury room.
 34 BY MR. BITTMAN:
 35 Q Would you have occasion -- you said your normal

Page 11

11 duty during that period of time was in the ellipse area
 12 obviously not in the White House. Would you have occasion,
 13 however, during the period now of June 1995 through April of
 14 1996 to work in the West Wing?
 15 A Yes.
 16 Q When would that come about?
 17 A Well, this would be on the weekends when the
 18 permanent officers were off or they decided they didn't want
 19 to work their days off. I would be assigned in that area.
 20 Q And would this be in a fill-in type --
 21 A Yes, definitely a fill-in.
 22 Q Would you get overtime for working those weekends?
 23 A Yes.
 24 Q About how many times between June '95 and April of
 25 '96 did you work weekends in the West Wing?
 26 A At least 15 -- 15 to 20. I mean, we could say 15
 27 to 20 that -- or maybe more. My work book only shows work,
 28 work, work. It doesn't give the assignment exactly where I
 29 worked, so I cannot really pinpoint an exact number.
 30 But I think we -- as we discussed, that from the
 31 time --
 32 Q June '95 through April '96.
 33 A I would say 15 or more times, approximately.
 34 Q Okay. Let's go to the map, please --
 35 A Okay.

Page 12

11 Q -- LF-1. As you can see, there's some handwriting
 12 on the map, on the diagram. There is Walkway No. 1 -- you
 13 see Walkway No. 1, which is to the left of the Oval Office?
 14 A Yes.
 15 Q And then there's Walkway No. 2, which is in front
 16 of one of the doors to the Oval Office at about 11:00?
 17 A Yes, sir.
 18 Q And going now to the right, you have Reception Area
 19 No. 1.
 20 A Yes.
 21 Q And the desk identified as "BC," which would be
 22 Betty Currie?
 23 A That's correct.
 24 Q Would you always -- in these times that you worked
 25 on the weekends in the West Wing, these 10 to 20 times you
 26 worked there on a weekends between June '95 and April '96,
 27 where would you be stationed?
 28 A Okay. If the president was not in the Oval Office,
 29 I would be stationed at Walkway No. 2, by -- in that area.
 30 That would be the post assignment, Walkway 2, which is in
 31 front of the Oval Office.
 32 Q Okay. When he's not in the Oval Office?
 33 A When he's not in the Oval Office, okay, this would
 34 be -- Monday through Friday I would be down in the vicinity
 35 of Walkway 1, which would be -- as you see, the Roosevelt

Page 13

11 Room and C. I would be in that area from Walkway 1 --
 12 Again, I wouldn't stand there all the time because
 13 it was like -- okay, you could move a little bit, go down to
 14 the pantry and get a cup of water or a cup of coffee, et
 15 cetera, you'd be offered a cup of coffee.
 16 So that would be during Monday through Friday, you
 17 would be in that area.
 18 Q Now, I thought you said that your regular
 19 assignment was at the ellipse.
 20 A That's correct. But, again, Monday through Friday,
 21 if a Uniformed Division officer was there, this was where he
 22 would be, okay?
 23 Q Okay.
 24 A This is where he would be at that point. Or if I
 25 worked overtime, would happen to catch that assignment --
 26 like if they would ask me to work four hours over and I had
 27 this assignment, and the president was in the Oval Office, I
 28 would be in Walkway 1 area.
 29 Q Okay. You testified that you worked weekends
 30 between June '95 and April '96 approximately 10 to 20 times.
 31 A In the West Wing assignment.
 32 Q In the West Wing assignment.
 33 A Yes.
 34 Q How many of those occasions did you work on Walkwa
 35 No. 1?

Page 14

[1] A It would have to be between 10 and 20 times.
 [2] Q All those times.
 [3] A All those times. I thought we were referring to
 [4] the times that I worked in this assignment.
 [5] Q Okay. I'm probably confused here, but were they
 [6] always on weekends that you worked between June '95 and April
 [7] '96?
 [8] A Again, when I would work overtime, somebody was
 [9] off, I would be put into that position, okay? Say, the
 [10] assignments would want me to work four hours over, and they
 [11] say, "Well, we've got to give you, you know, again, this
 [12] assignment," which I would take, and I would work there --
 [13] you know, I worked there a lot of overtime, you know, from --
 [14] starting at 2:30 to 6:30, you know, a four-hour block.
 [15] Q So you would fill in for people. Sometimes you
 [16] would work weekends. Sometimes you would work during the
 [17] week.
 [18] A On overtime at that assignment.
 [19] Q Okay. Is there a name for this assignment, to work
 [20] in Walkway No. 1?
 [21] A That would be called [redacted] and [redacted].
 [22] Q What's the difference between [redacted] and [redacted]?
 [23] A Two assignments, and when it's listed on the work
 [24] sheet, they'll have like two officers. They have -- one will
 [25] be -- generally -- they would rotate it every day, so one day

Page 17

[1] Q Who locks it?
 [2] A Well, again, it's -- when the president comes to
 [3] the Oval Office, he's surrounded by the Secret Service.
 [4] There's the lead agent on the detail would come in, and as
 [5] the president would come in the Oval Office, he would be the
 [6] person that would come through the Oval Office, physically
 [7] walk through the Oval Office, and as soon as the president
 [8] was in the Oval Office, he would pull the door shut.
 [9] Q And it's locked.
 [10] A It's locked.
 [11] Q What about the doors in the hallway to Walkway No.
 [12] 1?
 [13] A The doors in the hallway to Walkway No. 1? Okay,
 [14] the one door is the dining area. That is also a locked door.
 [15] Okay. The other door, which would be the pantry door, is --
 [16] of course, if the steward's there, it's open. If he's not
 [17] there, it's locked.
 [18] Q How often does the steward go in and out while the
 [19] president is in the Oval Office?
 [20] A Well, I can tell you from my experiences being
 [21] there that the steward would -- if the president wanted
 [22] something, the president would buzz the steward. Whether it
 [23] was coffee, soda, or maybe lunch arrangements or something
 [24] like that, the steward would -- the steward would hang -- be
 [25] in that area most generally all the time that the president

Page 15

[1] one officer would be [redacted] the permanent guys, the next day
 [2] it would be [redacted], and [redacted] would be the second person
 [3] to go out of the post, to go to the assignment.
 [4] [redacted] would be first officer to go, [redacted] [redacted] [redacted]
 [5] would be second. It was a two-man post.
 [6] Q [redacted] would be the second?
 [7] A Yes, would be the second person to go?
 [8] Q Would there always then be two people in Walkway
 [9] No. 1?
 [10] A Only one person -- okay. The first guy would be
 [11] Echo 6, okay? He would go and he'd do his stand. Then he
 [12] would be relieved by the [redacted] gentleman, or officer. He
 [13] would be relieved by that [redacted].
 [14] Q Okay. So when you would work, Echo 6 would be the
 [15] first guy to go.
 [16] A Correct.
 [17] Q Then [redacted] would go.
 [18] A Correct.
 [19] Q [redacted]
 [20] A And then --
 [21] Q And then Echo 6-A leaves --
 [22] A And Echo 6 comes back.
 [23] Q Echo 6 comes back.
 [24] A Right.
 [25]

Page 18

[1] was in there, with the exception of when he went down to the
 [2] staff mess to get lunch or get -- you know, whatever the
 [3] president might want for lunch. He would go down, bring it
 [4] back, prepare it right in the little -- a little pantry area
 [5] there.
 [6] Q There appears to be a door between Walkway No. 1
 [7] and Walkway No. 2.
 [8] A Yes, that's -- that's a door, and it's always open.
 [9] Q When you were in either [redacted] or [redacted], do you
 [10] ever go down to Walkway No. 2?
 [11] A Yes. And that would be -- it would be basically on
 [12] the weekends. If the president's there, you'd come down,
 [13] you'd chat with the PPD agent, the president's protective
 [14] agent. You'd come down, and it's not a lot of people at the
 [15] White House on the weekends, basically, and especially in the
 [16] West Wing, and you'd -- you'd come down, you'd talk about
 [17] maybe football, baseball, or where the next trip was going to
 [18] be, things like that.
 [19] Q So I gather from your testimony it's a little
 [20] looser on the weekends, that you're freer to roam up and down
 [21] the hallways.
 [22] A Well, it's -- I would not say you're freer. I
 [23] mean, you're still in a secure mood, protective mode. It's
 [24] just that you know that -- that we're not -- see, I don't
 [25] want to say this.

Page 16

[1] Q Okay. [redacted] Echo 6 leaves
 [2] again --
 [3] A Correct.
 [4] Q -- then [redacted] comes back.
 [5] A Yes, and you would --
 [6] Q Okay. So it's a [redacted] rotation.
 [7] A You would have a [redacted] stand each day.
 [8] Q So, obviously, two of those hours you would
 [9] actually be in the hallway.
 [10] A No, you would be in -- you would be there [redacted]
 [11] [redacted]
 [12] Q [redacted]
 [13] A Right.
 [14] Q Okay. Excuse me. I'll get this eventually.
 [15] A It's a complicated system.
 [16] Q Well, for someone like me, perhaps.
 [17] A Okay.
 [18] Q Let's return to the map, LF-1, and especially to
 [19] the Oval Office. The door at 11:00 --
 [20] A Okay.
 [21] Q -- is that door normally open or closed?
 [22] A Okay. During -- at the time the president's in the
 [23] Oval Office, the door is always secured.
 [24] Q Secured, meaning what?
 [25] A Locked.

Page 19

[1] You'd say that it's not freer, it's just maybe just
 [2] a notch above being a little loose, then to go down and talk
 [3] to the, you know --
 [4] Q And that I suppose is because there are fewer
 [5] people around.
 [6] A Fewer people, that's correct.
 [7] Q Okay. Do you know Monica Lewinsky?
 [8] A Yes, I do.
 [9] Q How do you know her?
 [10] A Well, it's a long story, so -- I was working in the
 [11] West Basement of the White House in the summer -- or in -- it
 [12] was in the summer, and, again, I was working overtime on that
 [13] day, and I was at the control post, and it was in the
 [14] afternoon.
 [15] And at that time I did not know her name, but she
 [16] showed up with a friend, and she said -- I said, "Hi, how are
 [17] you doing?" She says, "I have to pick up some papers."
 [18] So I saw the intern pass, so I said, "Okay. You
 [19] know the routine. Here's the -- you know, use the phone.
 [20] Call." And she said to me, "Do you mind that if my friend
 [21] looks around at the pictures here in the West Basement?" And
 [22] I said, "No." I says, "As long as you don't go away from my
 [23] view," I says, "you can look at the pictures."
 [24] So Monica makes the call, and they look at the
 [25] pictures and -- so then they kind of walk back down, and as

Page 20

they're standing there, another White House -- okay, it's a -- she actually worked for the DNC. Her name was Susan Levine, and she had a White House pass, and it was an OGA pass, which means Other Government Agencies, but she had access to the White House.

And her and Monica, they kind of ran into each other, and Susan says -- they introduced themselves, et cetera, to the friend and all that. And Susan says to Monica, "Look, I'm going to give a White House tour here." She says, "Would you like your friend to go?" So Monica looks at her friend, they kind of look, and she says, "Well, yeah."

So the friend takes off with Susan, goes on the tour. So Monica's standing there, and I tell her, "If you'd like to sit down over here to my right and wait for your papers."

So at this time we formally became introduced as, "I'm Officer Fox. They call me Lew," and she told me that her name is Monica Lewinsky. So that's -- after all this, we're introduced to each other.

So we're sitting there and we're just talking. I asked her where she was from. She says California. And she said that -- I said, "Well, where did you go to school?" And she says, "I went to Lewis & Clark." I said, "Oh, in Oregon?" She says, "Yes." She says, "How do you know about

Page 23

can get a copy of that picture." I said, "All you need is today's date and the photographer's name." And I said, "Submit a memo to the photo office and," I said, "they'll probably get you a copy." And I said, "If you know anybody, you could probably get it autographed."

And she thanked me very good. She says -- she says to me, "You like chocolates?" And I said, "Well," I said, "everybody likes chocolates."

And by this time within the time Susan and her friend came back. So Monica and her friend leave and go to the Old Executive Office Building.

And I never really thought anything more about it and -- about the chocolates or anything like that. So I'm working again -- one evening I'm working overtime, and a direct line rings, and the officer at the control post -- I was in another assignment -- he says, "Lew?" I says, "Yes?" He says, "I have someone down here that has something for you." And I said, "Well" -- and, again, I said, "Is it ticking?" He kind of laughed, he says, "No." He says, "It's Monica." I said, "Well, can you send her up?"

I mean, she was still in the intern status. But, again, post to post observation is a common thing in the White House as far as people going from point A to point B. And -- so Monica walks up the steps, and I say,

Page 21

that?" I says, "Well, I follow some, you know, sports, watching ESPN, Lewis & Clark College, et cetera, and I do know it's in Oregon."

So by this time the papers had come down, so she says, "You don't mind if I sit here and wait on my friend?" And I says, "Well, you can sit here, but," I says, "Susan gives a long tour, so you could be here for a while." And at that time she says, "Well, not much is going on in my office right now. I'll just -- I'll just sit here."

So, again, we talked. I told her where I was from. And so then the vice president came down the hallway, and I knew he was coming, so I just kind of -- I said to her, I said, "The vice president's coming," and I stood up, again, out of respect for the office, and so I stood up. And, you know, the vice president walks by, and he gives a little nod.

So, again, the schedule -- I knew that the president was going across the street to the Old Executive Office Building. I think it was Room 450, for a speech.

So it was just small talk between her and I. So then I get the signal that the president's coming. So, again, I stand up, and I say to her, I said, "The president's coming."

So she stands up. The president walks by, and, again, same routine, is a nod, and he goes across the street

Page 24

"Hi, Monica," and, you know, "How are you doing," and all that. She says, "Here, I brought you your chocolates." And here was this box of Godiva chocolates, and I went, "Huh." I says, "Look, you didn't have to do that," you know. And she said, "Well, I really appreciate what you did for me," and all that stuff. And I says, "Well, thank you."

So she turns and goes -- goes back down the basement and out to the West Wing.

So I get a phone call from -- a direct line. It says, "Hey, what did you get?" And I says, "I got chocolates." He says, "You're going to share them with me?" And I says, "No, these are too rich for your blood." I says, "I'm going to keep them myself."

And within a period of five or ten minutes I had gotten like three phone calls from officers saying, "Hey, can we have some chocolate? Can we have some chocolate?" And, again, I said, "Too rich for your blood. I'm going to take them home."

So that was -- that was how I met Monica Lewinsky. Q You mentioned a couple things I want to follow up on. The I pass, the intern pass, what is that?

A Okay. That's an intern pass. The "I" stands for "intern," okay? They have access -- basically, it will say in the computer -- if you put their name in, it will say, "EOB Access Only," which "EOB" means Old Executive Office

Page 22

to Room 450 in the Old Executive Office Building.

So after about 20, 25 minutes, the president comes back across the street into the West Basement, and, again, I stand up. There were two guests sitting on the couch in front of me, and I think that -- the best of my knowledge, they were waiting for Mack McLarty to -- for an appointment with him.

So the president walks in, and he immediately goes to these two people and they shake hands, and the White House photographer is behind him, and he takes pictures of the president shaking hands with the two guests that were there, visitors.

Then he turns and -- I'll say -- well, I call her Monica -- Ms. Lewinsky was standing again to my right. The president then turned and walked to Monica, shook hands, they turned, and a picture was taken with the president and Monica in the West Basement just, say, from here to that wall right there from me.

And the president then goes back to the Oval Office. And, you know, she was like, "Oh, my goodness, I got my picture taken with the president." She says, "You know, if it hadn't been for me sitting here talking to you, I wouldn't have seen the vice president, I wouldn't have seen the president and all. I got my picture taken."

And I said, "Well, Monica," I said, "you know you

Page 25

Building, or it will say, "EOB and White House, East Wing and West Wing."

So if that person showed up at your assignment, say -- say if she would show up in the West Basement, or any intern that would show up in the West Basement and say, "I'm here to work today," you would take a -- you would take their identification, you would put it in the computer, and it would tell you that -- I would just use a name, say, Joe Smith is authorized to be in the West Wing, and the office that he is assigned to.

So then what you do is then you call the -- you have them call the office. That office will come down and escort them to their office, okay? And that's how they would be in the system as far as working in the West Wing, where -- in EOB they would come in Monday through Friday. They would be allowed access to the Old Executive Office Building by being in the system, okay? If they came to the West Wing or the East Wing, it would have to definitely say West Wing or East Wing of the White House.

Q Does an I pass ever get you authority to go into to the West Wing?

A Yes, it gives you authority to come there. You have -- you can have an I pass, be an intern and work in the West Wing. But you have to be in the system to get in there, which would say West Wing, East Wing, et cetera.

Page 26

Q Can you tell from the face of an I pass whether or not you have access to the West Wing without going into the computer?

A No. You have to go into the computer. The computer tells you everything.

Q Do you know whether Ms. Lewinsky had access with her I pass to get into the West Wing?

A Only if someone -- only if someone would have come down and escort her to an office. She would have to be escorted. She just wouldn't be allowed to walk in.

Q Okay. Given your first meeting of Ms. Lewinsky, did you see her after that?

A Yes. I would see her occasionally. It would be like -- it would be like seeing your neighbor. You might see your neighbor for two or three days. Then all of a sudden you wouldn't see your neighbor for maybe a week.

And I would see her in the Old Executive Office Building. Again, the idea of times, I cannot tell you. But I would see her -- again, it would be like seeing your neighbor, saying, you know, "Hi. How are you doing?" Then you might not see him for two or three or four days or whatever, then all of a sudden you'd run into him again. He may go on the same travel schedule, whatever. And I'd always talk to her, you know. "Hi. How are you doing?" "Fine."

And as -- the longer she stayed there, well, you

Page 27

know, I would see her, and I -- this one particular day I saw her, and I said, "Oh, hi. How are you doing?" She stood, she says, "I've landed a position with a congressional staff in the East Wing." And I said, "Oh, congratulations." And then I told her, I said, "There's a lot of work in that office over there." And she said, "Well, that's what I hear." She says, "That's what I'm here for, is to work."

And she stated -- at that time she said, "I'm going down and getting my picture taken for my pass," which would have been a White House temporary pass, which would give her access to -- she would not have to be waved into the complex.

Q How long was it after she told you that she had gotten a permanent job at the White House was it since you first met her, approximately?

A You know, as far as the time, it's really hard to say, because she really got a permanent pass really quick. I would say maybe a month, month-and-a-half, something like that. I'm sure that she did not finish her internship.

You know, the internship generally comes there like -- I think it's probably three months or something like that, and she may have been at the end of her internship. But what strikes me was that I'd never seen an intern come there and end up getting a -- in my time, you know, I've never seen an intern get a permanent position there so quick.

Q When do you think this first meeting with her was,

Page 28

when she was an intern?

A It would have had to have been in the summer of '95.

Q Then at some time after that she told you she got a permanent position.

A Right. This was -- it wasn't -- you know, I'd say -- I don't really think she finished her internship or whatever. I mean, she was looking for a permanent position, I think, when she came there.

Q Did you later see her with this permanent pass?

A Yes.

Q Do you know what pass she got?

A It was a White House temporary pass, which would have been a pass -- it would be black-and-white, not a -- and would have an expiration date on it.

Q And that would get her into the West Wing?

A That would get her anywhere in the White House that she wanted to go within, you know, security reasons. She wouldn't be allowed to go to the north grounds or south grounds to take pictures and stuff like that.

Q What is a blue pass?

A A blue pass -- okay, a blue pass with the colored picture means it's a permanent pass, okay? And that's a White House pass.

Q And that will get you anywhere in the White House.

Page 29

A Yes.

Q Did Ms. Lewinsky ever have a blue pass, to your knowledge?

A She had a blue pass with a black-and-white picture --

Q Okay.

A -- which means temporary, which means temporary.

Still -- background still going on. You don't get your colored pass until your full background check has been made, okay? After your full background check has been made, then if you're going to stay with the administration, you're given a blue pass with a colored picture.

Q Can you tell us approximately how many times you would see Ms. Lewinsky in the White House, whether East Wing, West Wing, or wherever, between June '95 and April '96?

A Well, until she got her permanent pass, which -- or I mean her temporary pass -- I don't know exactly the month that she got it, okay? I have no idea. I just -- conversation, you know.

I would see her quite a bit. She would be, you know, coming to the West Wing. Sometimes she'd go down to the staff mess, maybe get some coffee or sodas or something like that. I would see her in our office in the East Wing when I'd work over. Her office was on the burn bag pickup, which is the security papers that they would want disposed

Page 30

of. You'd have to go in there and pick up the burn bags.

And I would see her in the East Wing office, and it was, again, like seeing your neighbors. You might see them two or three times, then you might not see them for a while.

So I can't really say the exact amount of times or anything like that.

Q Did you have a cordial relationship with her?

A It was a "Hi, Monica," "Hi, Lew" type thing. That was strictly it.

Q Did you ever go into more detail about -- other than your first meeting where you talked about where you were from and she at least talked about where she went to college.

did you ever follow up with her, like, "How do you like Washington?" or anything like that?

A Oh, basically, you know, she -- she told me she lived in the Watergate with her mother, and that was basically about it, I mean, as far as -- as far as that was concerned.

Q Would it be fair to say you saw her like on a weekly basis?

A As number of -- yes, probably so. I mean, it would probably be -- again, I might, you know, see her two or three days in a row, and then the next time I would see her maybe only one time.

Q You told us about one time you saw Ms. Lewinsky go

Page 31

into the Oval Office.

A That's correct.

Q Can you tell the grand jury about that, please?

A Okay. On this -- it was a weekend day, I was working at the Oval Office, and it was a quiet day, and I was glad the president was over there because it kept the private tours out of the West Wing.

Again, on the weekends the staff members would bring in guests to show the Oval Office, the Cabinet Room, the Roosevelt Room, pictures and like that, so I was kind of glad the president was there that day because there was no tours.

And I came on the assignment. I hadn't been there very long, and I was stationed in the Walkway 2 area, off to the -- I would be facing the Oval Office door, and I was stationed off to the -- actually, off to the right, just chatting with the agent.

And the Oval Office door was up, and the President of the United States came out, and he asked me, he says, "Have you seen any young congressional staff members here today?" I said, "No, sir." He said, "Well, I'm expecting one." He says, "Would you please let me know when they show up?" And I said, "Yes, sir."

So the agent was, again -- he was in Walkway 2, but he was to -- would be to my left, okay? I'm more down toward

Page 32

[1] Walkway 1 and he's more back toward Walkway -- or Betty
 [2] Currie's office, but still in that area.
 [3] Q Why don't you, Mr. Fox -- why don't you identify --
 [4] A Okay.
 [5] Q -- on the document -- why don't you put an "LF"
 [6] where you were --
 [7] A Okay.
 [8] Q -- and then an "A" where the agent was when this
 [9] occurred?
 [10] (The witness marked the document.)
 [11] THE WITNESS: Okay, that's approximate.
 [12] BY MR. BITTMAN:
 [13] Q Okay. So, just for the record, the agent was in
 [14] the doorway -- approximately in the doorway between Walkway
 [15] No. 2 and Waiting Area No. 1.
 [16] A Yes, yes.
 [17] Q And you were right outside the door to the Oval
 [18] Office.
 [19] A Correct, but to the right, more -- to the right of
 [20] the door, okay?
 [21] Q Well, on the document, to the left of the door.
 [22] A Okay, okay.
 [23] Q To the right facing the door --
 [24] A Yes.
 [25] Q -- from the hallway.

Page 33

[1] A That's correct.
 [2] Q Okay. And when was this approximately? When did
 [3] it take place?
 [4] A Okay. It would have -- again, it would have to
 [5] have taken place between 12:30 and 2:30 that day.
 [6] Q Either a Saturday or a Sunday.
 [7] A Saturday or Sunday, yes, sir.
 [8] Q Do you know what month it occurred in?
 [9] A No, sir.
 [10] Q Do you know what time of year it was?
 [11] A I would say it was late fall.
 [12] Q Late fall of what year?
 [13] A '95.
 [14] Q '95.
 [15] A Yes.
 [16] Q Okay.
 [17] A The best of my -- my recollection of this.
 [18] Q Please continue what happened.
 [19] A Okay, well, the president goes back in the office,
 [20] and the agent comes to me and says, "Well, what's going on?"
 [21] I says, "Well," I says, "let me describe the person to you
 [22] and see if I'm right."
 [23] So I described Ms. Lewinsky, without mentioning the
 [24] name, in detail, dark hair -- you know, I gave a general
 [25] description of what she looked like.

Page 34

[1] Q Physical description.
 [2] A Physical description. And he says, "Oh, okay."
 [3] So within ten minutes or so --
 [4] Q Can I stop you there?
 [5] A Yes.
 [6] Q When you said the agent said something to you to
 [7] the effect of, "What's going on" --
 [8] A Well, meaning, you know, who's coming. I mean, he
 [9] had heard the conversation from the president, saying that he
 [10] was expecting someone. I mean, he heard the conversation.
 [11] Q Did you get the impression from the president's
 [12] question to you that he was expecting one person or a group
 [13] of people?
 [14] A His statement was to me, "I'm expecting a young
 [15] lady, a young congressional staff member," okay? Now, he
 [16] said, "Would you please let me know when they show up?"
 [17] Q Okay. And you tell the agent this and give a
 [18] physical description --
 [19] A Physical description of Ms. Lewinsky.
 [20] Q Okay. And then what happened?
 [21] A Well, we're standing there, and within a period of
 [22] ten minutes or less, Ms. Lewinsky shows up carrying a folder
 [23] much, you know, like that's on the table here, something of
 [24] that description. And she immediately -- she comes to me
 [25] and, again, we exchange "Hi, Monica," "Hi, Lew," and she

Page 35

[1] says, "I have some papers here for the president." And I
 [2] says, "Okay."
 [3] So I look at the agent and the agent looks at me,
 [4] and he kind of gives me the okay to go ahead and open up the
 [5] door. So I go to the door and I access the security of the
 [6] door, and as I'm doing that, I'm knocking on the door,
 [7] holding onto the door knob, and I hear the president's voice,
 [8] "Yes?" The door swings open and -- the door swings open this
 [9] way, and I step back and Ms. Lewinsky steps into the -- goes
 [10] into the Oval Office.
 [11] And, again, it's an exchange between the president
 [12] and Monica. It's "Hi, Monica," "Hi, Mr. President." And I --
 [13] then I step back from the door in view of the Oval Office.
 [14] I step back. The agent then steps up to the rope line, which
 [15] is in the doorway of the Oval Office.
 [16] When I say "rope line," it's -- again, when the
 [17] Oval Office doors are open, there's a rope across the door
 [18] just so people can look in and, you know, keep them out.
 [19] He steps up to the rope line in a protective type
 [20] that he's trained to do, and the next thing I hear is the
 [21] president telling the agent, "You can close the door. She'll
 [22] be here for a while."
 [23] Q Was the agent at the rope line -- the rope was not
 [24] up, I assume.
 [25] A No, sir, no.

Page 36

[1] Q Okay. Was the agent looking into the Oval Office?
 [2] A Yes.
 [3] Q Okay. Do you know whether prior to Ms. Lewinsky
 [4] going into the Oval Office whether the president was in there
 [5] alone or not?
 [6] A I would say that he came to the Oval Office alone.
 [7] The best of my knowledge, he was there alone.
 [8] Q How would you know that?
 [9] A Well, if somebody would have been in there with
 [10] him, my relief would have told me there's someone in the Oval
 [11] Office.
 [12] Q And when Ms. Lewinsky went in, do you know whether
 [13] anyone else was in there other than the president and Ms.
 [14] Lewinsky?
 [15] A That's all I saw in the Oval Office.
 [16] Q Is there any system to alert you as to whether or
 [17] not there are other people in the Oval Office with the
 [18] president?
 [19] A Not in the Oval Office, no, there's no system to --
 [20] the only way I would know is if somebody -- after the
 [21] president entered the Oval Office, if somebody came on that
 [22] day, they would have had to come through the door in Walkway
 [23] 2 or through the Colonnade C. An alarm would have been set
 [24] off, and that would mean somebody else would have come in.
 [25] Q What if somebody entered from Ms. Currie's area?

Page 37

[1] A That would be -- that would be impossible because
 [2] the door was locked.
 [3] Q So you didn't see anyone else go in after Ms.
 [4] Lewinsky entered with the president.
 [5] A I did not.
 [6] Q And had someone entered from one of the other two
 [7] doors [REDACTED]
 [8] A That's correct.
 [9] Q And you would have known that someone was entering
 [10] A That's correct.
 [11] Q Okay. How long was Ms. Lewinsky in the Oval Office
 [12] with the president on that day?
 [13] A Okay. I would say approximately 40 minutes,
 [14] because of the time that -- the time the president came out
 [15] and was in the Oval Office, he came out and the time Ms.
 [16] Lewinsky -- it was probably 20 minutes into my stand up on
 [17] that time.
 [18] Q And then you left?
 [19] A Yes.
 [20] Q And by the time you left had Ms. Lewinsky left?
 [21] A No.
 [22] Q She was still in there by the time you left.
 [23] A Yes, correct.
 [24] Q If the president were to leave the Oval Office,
 [25] would you know that?

Page 38

A Only if he went through the door in Walkway 2 or if he would have exited C, the colonnade door, I would have known that.

Q The door at 3:00.

A Yes.

Q What if the president were to go into the study area, would you know that?

A No, I would not know.

THE FOREPERSON: Excuse me, Mr. Bittman. It's time for the grand jurors to take a ten-minute break.

MR. BITTMAN: Okay. Let's take a ten-minute break.

THE WITNESS: Great.
(Witness excused. Witness recalled.)

THE FOREPERSON: Mr. Fox, I'd like to remind you that you're still under oath.

THE WITNESS: Yes, ma'am. I understand.

BY MR. BITTMAN:

Q Mr. Fox, you identified on LF-1 an area in the walkway that you wrote on, you have two red bars in the walkway?

A Yes.

Q What do those represent?

A Okay, that is the area during the time that the president would be in the Oval Office that the Uniformed Division officer would be basically required to stay in that

Page 39

area Monday through Friday, during normal business hours, at the White House.

Q What about on weekends?

A Weekends, a little more freer. We could maybe go down to the Walkway 2 area, chat with the agent there.

Q Is that then -- the area between those two red bars, is that known as [redacted] and [redacted]?

A Okay. Yes, that would be the assignment called [redacted], when the president's in the Oval Office.

Q The day that you just described for us when Ms. Lewinsky came in, went into the Oval Office, do you remember how she was dressed?

A Again, I -- I think she was wearing a dress, just a normal -- nothing elaborate. It was, again, weekend, like maybe a down -- nothing real -- you know, not a business type outfit or anything like that. I don't know. It was probably a dress.

Q Do you remember what pass she had at the time?

A It would have been -- it would have had to have been a temporary White House pass, a black-and-white picture.

Q Do you remember whether Betty Currie was in her office or in the West Wing that day?

A She was not.

Q Do you remember whether Nancy Herrreich was in the West Wing that day?

Page 40

A She was not.

Q Was anyone in that area where Mrs. Currie and Ms. Herrreich sit?

A That office was secured that day, so no one could have been in there.

Q Secured, you mean closed and locked?

A Closed and locked.

Q You described the rope line going into the Oval Office, that is, the door at the 11:00 area. What is the rope line? What do you mean by a rope line?

A Okay. It would be when the Oval Office is -- when the president's not in the Oval Office, okay, there's a rope, a blue velvet-covered rope that's put up there, that if you brought friends into the Oval Office, they could walk up to that area and look into the Oval Office. They're restricted from going beyond that rope, okay, into the Oval Office.

Q And that's like a tour situation?

A Yes. It would be staff members bringing in family, special guests, et cetera, coming in on the weekends and Saturdays after 1:00, Sundays anytime, you know, as long as the president's not in the Oval Office.

Q You also described that after Ms. Lewinsky entered the Oval Office, that the agent moved from his position between the walkways and then walked up to the blue line area looking into the Oval Office.

Page 41

A That's correct.

Q Is that common? Is that what the agents are supposed to do when someone enters the Oval Office?

A Well, generally, it's -- they're trained really for protection, so it's that they want to see what's going on. So that would be a common -- common thing for them to walk up and see, you know, what's going to happen.

Q Is it common or uncommon for then the president, after he receives the guest, to tell the agent to -- or ask the agent to shut the door?

A Well, you know, apparently the president had something he wanted to discuss with Ms. Lewinsky and he wanted to -- you know, asked the agent to close the door.

Q Is that common or uncommon?

A Well, I would say that's -- it would be common to have the door closed when there's a guest in the Oval Office.

Q You also said that when the president first came out to you and the agent in the walkway and asked if you had seen a congressional staffer, that you then described Ms. Lewinsky to the agent --

A That's correct.

Q -- thinking that that was the person that the president was expecting.

A That's correct.

Q Why did you think that that was the person the

Page 42

president was expecting?

A Well, after she gave me -- after she gave me candy, she became my girl. I mean, that's police talk or whatever, that's Lew's girl, you know, hey, Lew's girl.

Q Quote, unquote.

A Quote, unquote. You know, nothing, but it was -- it became Lew's girl and --

Q To whom was she Lew's girl?

A To the officers in the West Wing, the officers that worked around there, because they knew the candy -- candy-giving.

And there was always a little talk that -- from the guys, and, again, it's talk and, "Hey, Lew, your girl was here to see the president this weekend." "Hey, Lew, you know, your girl's seeing the president a lot."

Again, this just conversation from one officer to another. It's not upsetting me or anything, it's -- but it was just a little -- just a little punch at me, you know, that -- that this was happening, you know.

Q How many different officers do you think told you, or did it get back to you that Ms. Lewinsky had been visiting the president in the West Wing?

A Well, the regular assigned officers that were there -- would be there. I mean, it was pretty commonly known that she did frequent the West Wing on the weekends throughout --

Page 43

again, throughout the time up until she left.

Q Was there any other occasion that you personally saw Ms. Lewinsky in the West Wing?

A Yes.

Q Can you describe that for us, please?

A Well, again, her bringing papers over, her going to the staff mess to get sodas, et cetera.

One other time is, I was coming to the assignment. I saw her leave the Oval Office. Again, I have no idea of the amount of time she was in there. I was just coming on, and she came out the door and proceeded from -- to the right, which would have been Walkway 2 through Waiting Area, all the way over to Walking [4] 4, she proceeded that way.

Q Where were you when you saw her exit the Oval Office?

A Okay. I would have been down in Walkway 1, in view of the Oval Office door.

Q And where was she?

A Where was she? She would have been exiting C, okay, in Walkway 2.

Q Okay. There actually are a number of C's.

A Okay, the 11:00, the 11:00.

Q The 11:00 door.

A Yes.

Q Okay. You saw her exit that door?

Page 44

[1] A Yes.
 [2] Q And then she took a left and proceeded down the
 [3] hallway?
 [4] A She would go to the right, which would have been
 [5] Walkway 2, Waiting No. 1 --
 [6] Q Okay.
 [7] A Okay.
 [8] Q And you were coming from the other direction.
 [9] A Yes, sir.
 [10] Q You were coming from the left.
 [11] A That's correct.
 [12] Q Okay. Did you talk to her on that occasion?
 [13] A No, sir.
 [14] Q Do you know when that was relative to the incident
 [15] where Ms. Lewinsky went into the Oval Office that you
 [16] observed?
 [17] A Not really, no, sir.
 [18] Q Do you know whether it was before or after?
 [19] A I would say it was probably -- probably after.
 [20] Q Can you estimate whether it was within a couple of
 [21] months, within a couple of weeks?
 [22] A Probably within a month's time.
 [23] Q Okay. Do you remember what she was wearing on that
 [24] occasion?
 [25] A No, sir, I don't.

Page 45

[1] Q And you were coming on to your shift?
 [2] A That's correct, on to the either E 6 or E 6-A
 [3] assignment.
 [4] Q Okay. You've already told us that when you come on
 [5] to your shift, the other officers indicate to you where the
 [6] president is and who he is with.
 [7] A That's correct.
 [8] Q Do you remember on that occasion when you saw Ms.
 [9] Lewinsky exit the Oval Office, you were coming on to your
 [10] shift, did the officer you were relieving, did he or she
 [11] indicate who was in the Oval Office?
 [12] A No.
 [13] Q Do you know whether the president was in there?
 [14] A Yes.
 [15] Q So he at least was in there.
 [16] A Yes.
 [17] Q Do you know whether anyone else was in there?
 [18] A No, not on that occasion.
 [19] Q Okay. Is it fair to say you just don't remember?
 [20] A That's -- basically, that's it. I mean, I saw her
 [21] exit the --
 [22] Q Okay. Because, I mean, it is your job to know
 [23] who's in there.
 [24] A Right. But, again, I think probably what happened
 [25] was, when I came, the officer had kind of turned and seen me

Page 46

[1] coming, and he was in this area here, and he probably
 [2] walked -- you know, walked away, wanting to get out, you
 [3] know, take his break.
 [4] Q Can you give us the names of some of the officers
 [5] who have told you that they have seen Ms. Lewinsky go into
 [6] the Oval Office to see the president?
 [7] A Okay. That would be Officer Gary Byrne, and then,
 [8] again, the other officers that were post assigned there
 [9] were -- I think Sandy Verna might be one.
 [10] Q Sandy Verna?
 [11] A Verna.
 [12] Q How do you spell his last name?
 [13] A It's Sandy, it's a female. It's V-e-r-n-a.
 [14] The regular assigned guys would have been Bob
 [15] Almsy --
 [16] Q How do you spell Bob's last name?
 [17] A A-l-m-a-s-y. And another officer would have been
 [18] -- again, assigned at, would have been seen, would have been Dan
 [19] Ordakowski, O-r-d-a-k-o-w-s-k-i.
 [20] And -- I mean, they was the regularly assigned, you
 [21] know, would kind of talk.
 [22] Q Do you remember Gary Byrne telling you that he had
 [23] seen Ms. Lewinsky go into the Oval Office with the president?
 [24] A Well, this was after the -- again, when Ms.
 [25] Lewinsky was basically told she was going to the Pentagon, I

Page 47

[1] saw her on that day, and she was -- she was real teary-eyed,
 [2] and I said, "Monica," you know, "what's the matter?" I said,
 [3] you know, "You're okay?"
 [4] And, you know, tears were rolling out, and she
 [5] says, "Well," you know, "they're trying to get me a job at
 [6] the Pentagon." She said, "I don't work here anymore." So I
 [7] said, "Well," you know, "take care of yourself." And she
 [8] left.
 [9] So within a day or so I was talking to Officer
 [10] Byrne. I said, "Well, I guess they shipped Monica out." He
 [11] kind of give me a little smile and he says, "Yeah." And so
 [12] he tells me the story that -- that he had went to Ms.
 [13] Lieberman's office to -- he was quite concerned about her
 [14] frequent visits to the West Wing, to the Oval Office area --
 [15] Q Officer Byrne was.
 [16] A Yes, Officer Byrne was. And he went to Ms.
 [17] Lieberman, and apparently she was not in the office, so he
 [18] left his phone number. He said, "Have her call me tonight
 [19] when" -- or, "Have her call me."
 [20] So apparently Gary went home, and the phone rang,
 [21] and it was Ms. Lieberman, and she said she'd like to talk to
 [22] him and she'd like for him to come back in to town. And Gary
 [23] said, "Well, I live like 40 miles away." He said, "And I've
 [24] got plans tonight." He said, "I'll come in tomorrow."
 [25] And so apparently he went in the next day after

Page 48

[1] that and talked to Ms. Lieberman about what was going on in
 [2] that situation, and within the next day or so, this is when
 [3] Ms. Lewinsky was sent off to the Pentagon.
 [4] Q What did Officer Byrne tell you he told Ms.
 [5] Lieberman?
 [6] A That Ms. Lewinsky was hanging out around the Oval
 [7] Office too much, in his opinion.
 [8] Q Is that something that uniformed officers typically
 [9] tell White House staffers about?
 [10] A Well, Officer Byrne is a very conscientious person,
 [11] and it was just something he thought that he had to tell Ms.
 [12] Lieberman about, about this situation.
 [13] Q Did Officer Byrne see Ms. Lewinsky around the
 [14] office, or did he see Ms. Lewinsky go into the office on
 [15] several occasions?
 [16] A His statement to me was, "She was hanging around
 [17] the Oval Office too much." Now, again, that's his statement
 [18] to me, that she was hanging around the Oval Office too much.
 [19] Q Did Officer Byrne indicate what Ms. Lieberman's
 [20] reaction was when Officer Byrne informed Ms. Lieberman?
 [21] A No.
 [22] Q But Officer Byrne told you it was a couple of days
 [23] before you had your conversation with Ms. Lewinsky about
 [24] being moved.
 [25] A Okay. Ms. Lewinsky, again, had, you know, told me

Page 49

[1] she was going to the Pentagon, and a couple days later -- a
 [2] day or so later I talked to Officer Byrne, I said, "Well, I
 [3] see Monica's going." And it was a day -- one or two days
 [4] after that.
 [5] And he stated to me -- that's what I stated to you,
 [6] that he had made this talk with Ms. Lieberman, the phone call
 [7] wanting him to come back in, he said he had plans with his
 [8] wife and would come in the first thing in the morning and
 [9] talk to her.
 [10] Q Was that the only occasion where Officer Byrne had
 [11] told you that he had seen Ms. Lewinsky around the Oval
 [12] Office?
 [13] A Yes, basically.
 [14] Q Tell us about the times Sandy Verna told you.
 [15] A That, again, was just -- I mean, I'm saying those
 [16] -- she did not tell me. Those were people that had worked
 [17] the assignment, that had -- that I had heard -- again, had
 [18] heard that she was there. She never -- Gary Byrne is the
 [19] only officer that actually told me about this.
 [20] The other officers had indicated -- you know, they
 [21] had not personally told me. That was Ordakowski, Almsy and
 [22] them. They were the regularly assigned officers, so they
 [23] would have more high contact with what's going on than what I
 [24] would have had.
 [25] Q I thought you testified that there was common talk

Page 50

[1] among the officers that Ms. Lewinsky was seen going in and
 [2] out of the Oval Office.
 [3] A That's correct.
 [4] Q Okay. Was the common talk about the officers, Gary
 [5] Byrne, Sandy Verna, Bob Almasy, Dan Ordakowski?
 [6] A Yes.
 [7] Q And others?
 [8] A Probably so, not -- they're not names that I would
 [9] not -- would not know.
 [10] Q And you heard this talk.
 [11] A Yeah.
 [12] Q And others heard it, too.
 [13] A I guess so.
 [14] Q Do you know Tom Owens?
 [15] A I've heard the name. I cannot place a -- cannot
 [16] place a face to the name. I cannot really -- he could walk
 [17] in here and if you show me a picture, I -- two or three
 [18] pictures, I might be able to point him out to you.
 [19] Q These are Secret Service uniformed officers, I
 [20] believe. William Cherry?
 [21] A Cherry does not ring a bell.
 [22] Q Mark Frantzen, F-r-a-n-t-z-e-n?
 [23] A Does not ring a bell.
 [24] Q You know Maurice Henderson?
 [25] A Henderson, yes. Either Maurice Henderson --

Page 53

[1] reference to a door to what's marked as the Dining Room on
 [2] this map, LF-1, and it wasn't clear to me which door you were
 [3] talking about.
 [4] So I want to talk about the two doors from Waikway
 [5] 1 that enter into the Dining Room. okay? Are you with me?
 [6] A Yes.
 [7] Q Okay. First, the one that's marked C, to the left
 [8] of the Dining Room.
 [9] A Yes.
 [10] Q [REDACTED]
 [11] A [REDACTED]
 [12] Q All right. In terms of the doors around the West
 [13] Wing, that particular door is a pretty secure door?
 [14] A Yes, sir.
 [15] Q All right. That's not a door that somebody's just
 [16] going to go in and walk right in, typically?
 [17] A No.
 [18] Q Very unusual.
 [19] A They have to know how to get in.
 [20] Q Okay. There's a special way to get in?
 [21] A Yes.
 [22] Q All right. Do you need a key to get in?
 [23] A You can use a key.
 [24] BY MR. BITTMAN:
 [25] Q Who has keys?

Page 51

[1] Q Who's Maurice Henderson?
 [2] A Maurice Henderson is a Uniformed Division officer,
 [3] a black gentleman.
 [4] Q Do you know a woman named -- who used to work,
 [5] actually, was Ms. Lewinsky's boss, Jocelyn Jolly?
 [6] A No.
 [7] Q Did you ever know that Ms. Jolly was removed from
 [8] the White House at the same time that Ms. Lewinsky was?
 [9] A I did not know that.
 [10] Q Do you know a gentleman by the name of Carpenter
 [11] who was in charge of the protective detail between 1992 and
 [12] 1996?
 [13] A Yes. Dave Carpenter and I go back to the Carter
 [14] Administration.
 [15] Q Do you know him -- is he a friend of yours?
 [16] A Yes, I would say he's a friend.
 [17] Q Is he retired?
 [18] A I'm not sure. I'm not sure. I know he was
 [19] transferred off the detail to 1800 G Street. But, again, I
 [20] know his wife, and when I see her I say, "Hey, how's Dave
 [21] doing," you know.
 [22] Q Did his wife used to work at the White House?
 [23] A Yes. His wife was with the stenographers, which
 [24] anytime -- if there was a statement by the president made, it
 [25] would be in the -- much like we have here to my left. She

Page 54

[1] A [REDACTED]
 [2] [REDACTED]
 [3] [REDACTED]
 [4] [REDACTED]
 [5] Q [REDACTED]
 [6] A [REDACTED]
 [7] [REDACTED]
 [8] [REDACTED]
 [9] W [REDACTED]
 [10] [REDACTED]
 [11] BY MR. WISENBERG:
 [12] Q So a staffer would not typically have a key to this
 [13] door you've identified, the main door into the Dining Room,
 [14] correct?
 [15] A They would not have a key.
 [16] Q All right. Would they know any other way to get in
 [17] without a key?
 [18] A No.
 [19] Q Okay. Is there a way to get in without the key?
 [20] A Through this -- into the dining area?
 [21] Q Right.
 [22] A If you look back at the patio --
 [23] Q No, I meant through that door.
 [24] A Oh, through that door. No, they -- I believe they
 [25] could not get in.

Page 52

[1] would be in making the statements -- or collecting those
 [2] statements and taking them to an office, typing them up, and
 [3] releasing them to the news agencies.
 [4] Q Did you ever see Eleanor Mondale? Do you know who
 [5] she is?
 [6] A I do.
 [7] Q Have you ever seen her go into the West Wing?
 [8] A No.
 [9] Q Okay. Have you ever known any Secret Service
 [10] officer to be reprimanded or demoted for letting people in
 [11] that shouldn't be let in?
 [12] A Yes.
 [13] Q During the current presidency, President Clinton's?
 [14] A Not -- I can't recall against -- not -- I can't
 [15] recall against his presidency.
 [16] Q Okay.
 [17] MR. BITTMAN: That's all I have.
 [18] BY MR. WISENBERG:
 [19] Q I'm going to go over to this position so I can get
 [20] a look at your map there.
 [21] A Okay.
 [22] Q We're looking at LF-1; is that correct, Mr. Fox?
 [23] Exhibit LF-1 over here?
 [24] A Yes.
 [25] Q Okay. You mentioned earlier a -- you made

Page 55

[1] Q Okay.
 [2] A I mean, it would be -- again, it's under a secure
 [3] system, okay?
 [4] Q And I take it from what you've told us, even if it
 [5] wasn't secure, typically, there is a uniformed guard who has
 [6] a view of that door at all times; is that correct?
 [7] A That's correct.
 [8] Q That's correct whether the president's in the Oval
 [9] Office or not.
 [10] A That's right. That door is always locked.
 [11] Q All right.
 [12] A It's always locked.
 [13] Q Right. But my question is -- you've told us that,
 [14] but whether that door is locked or not, isn't there always at
 [15] least a uniformed Secret Service person with a view of that
 [16] door?
 [17] A That's correct.
 [18] Q Whether or not the president is in the Oval Office.
 [19] A That's correct.
 [20] Q Okay. The other way to get in -- you've mentioned
 [21] there's a patio door into the Dining Room, correct?
 [22] A That's correct.
 [23] Q Is that typically kept [REDACTED]
 [24] A [REDACTED]
 [25] Q All right. Very unusual for anyone to enter in

Page 56

Page 59

through there?
 A Basically, nobody -- I mean, again, we're talking security, that no one could actually get back there to get into that area.
 Q Okay. Then you mentioned the pantry door, which is marked with a "PD," not by you, but it's marked with a "PD" over on the right; is that correct?
 A That's correct.
 Q And I believe you testified that [REDACTED]
 A Yes.
 Q Is that correct?
 A Yes.
 Q And you're referring to -- I want to just make sure what you're referring to when you say that because on the pantry door, there are doors from the pantry out into Walkway 1 and from the pantry into the Dining Room, correct?
 A That's correct.
 Q So when you say [REDACTED], are you talking about from Walkway 1?
 A The outer door, yes, sir, Walkway 1.
 Q Okay. So no one's going to be able to come in there.
 A No.

would have both a view all the way down [REDACTED]
 A Yes.
 Q All right. Now, let's go to weekends. When the president is there on the weekends, if I understand you, the difference -- the only difference between the weekday is that you might [REDACTED]
 A Right.
 Q You might be allowed to [REDACTED]
 A That's correct.
 Q But you've still got the plainclothes Secret Service there.
 A That's correct.
 Q Weekends when the president isn't there, the plainclothes Service Servicemen go away.
 A That's correct.
 Q Where would you typically be stationed, or the uniformed person be stationed?
 A I would be at the [REDACTED] in that area.
 Q Okay, all right. You were talking about the first time you met Ms. Lewinsky when you were working in the West Basement in the summer; is that correct?
 A That's correct.
 Q That would be the summer of '95; is that correct?

Page 57

Page 60

Q And if they do, you're watching them, or whoever the uniformed guard out there is watching them, correct?
 A That's correct.
 Q All right. Is it fair to say that this is an area of the utmost security within the White House, the area we're describing, that walkway leading into the Dining Room; is that correct?
 A Yes.
 Q Does some kind of a secret alarm go off -- if a person were to open either one of the -- if a person were to try to get into the Dining Room, either through the main door or through the pantry door, does some kind of a silent alarm go off that alerts you guys?
 MR. BITTMAN: That gets into a security area.
 THE WITNESS: That's in a security question.
 BY MR. WISENBERG:
 Q Okay.
 A I just don't feel comfortable in answering --
 Q Okay.
 A -- in answering that question. That's a security question, okay?
 Q Okay. If I understand you, when the president is in the Oval Office on a weekday --
 A Monday through Friday.
 Q Okay, right. When he's in there, you're going to

A Yes, sir.
 Q All right. You mentioned that this fellow Carpenter that Mr. Bittman mentioned had been transferred, or Mr. Bittman mentioned it. Do you recall that, from the White House detail?
 A Yes.
 Q Do you know why he was transferred?
 A I have no idea. I thought it was a promotion, you know, he got another grade. It's basically what I heard.
 Q All right. You haven't heard anything unusual about the transfer, that --
 A Oh, no, no.
 Q Okay. You mentioned that the president said -- on the day that Ms. Lewinsky was in the Oval Office for, at least while you were there, about 40 minutes, approximately 40 minutes, you mentioned that he said that he was waiting for or expecting a young congressional staff member?
 A That's correct, they're his words.
 Q Did you interpret that to mean somebody from the White House who was in congressional staffing as opposed to somebody who was from the Congress, who worked for the Congress?
 A That I -- the White House.
 Q Okay. Because, obviously, a congressional

Page 58

Page 61

always have plainclothes Secret Service somewhere in [REDACTED]
 A That's correct.
 Q And you will have uniformed in [REDACTED], in the area within the red bars you have drawn.
 A That's correct.
 Q Okay. On the weekend -- okay, let's stop there. That's weekdays when the president's there, correct?
 A That's correct.
 Q Weekdays when the president is not there, the plainclothes Secret Service [REDACTED]
 A That's correct.
 Q Where would the uniformed guard be? Within the same bar area --
 A No.
 Q -- or would the uniformed guard move over to [REDACTED]
 A The uniformed officer would move over to [REDACTED] okay?
 Q Okay.
 A In the [REDACTED] okay?
 Q All right.
 A The door to the Oval Office would be [REDACTED]
 Q All right. And, I take it, that uniformed guard

staffer --
 A Yeah.
 Q -- wouldn't be able to walk freely in the area of the West Wing.
 A No, they would not be allowed access.
 Q Okay.
 A From the Hill, that is.
 Q Right.
 BY MR. BITTMAN:
 Q Do you remember, Mr. Fox, the name of the agent who was present with you that day when Ms. Lewinsky entered the Oval Office that you saw?
 A Again, faces, names are very -- it's just one of those things. I'm not a great name person. I remember the face, but the name is --
 Q You would recognize his face then?
 A Well, I'd have -- you know, I'd have to look at some pictures. I mean, it's really a thing of where I -- again, the faces, but names -- I have a hard time with names of people, really.
 Q You'll certainly remember Mr. Wisenberg, though, won't you?
 A Oh, yeah, yeah.
 Q Okay. They all do.

Page 62

BY MR. WISENBERG:

Q I want to go back to a question Mr. Bittman asked and let me re-ask it.

The statement that you told us about that Mr. Byrne, Gary Byrne told you he made to Evelyn Lieberman -- you recall talking about that?

A Yes.

Q Mr. Bittman asked you, how typical was that? I mean, in your experience -- let's just talk about the Clinton White House. Are you aware of any other type statement being made to Evelyn Lieberman by uniformed or plainclothes Secret Service?

A No.

Q Meaning no one told you, or you haven't heard of it?

A I haven't heard of any statement by anybody.

Q Okay. Does it strike you that that would not be a usual type statement, a usual type statement that a Secret Service -- he was uniformed, correct?

A That's correct.

Q Was he your supervisor?

A No, he was just an officer like myself.

Q Okay. That a uniformed officer would -- is that typical of a statement a uniformed officer would make to somebody in Ms. Lieberman's position?

Page 65

agents who have talked to you about their knowledge of Ms. Lewinsky?

A No.

Q Your post, [redacted] you obviously would have good sight and knowledge of the stewards who used the pantry?

A That's correct.

Q Did you develop any relationship with any of the stewards?

A Both Nelvis and Glenn, yes.

Q Are you friends with both of them?

A As far as -- work friends, okay? It basically would be a work friend type relationship that we had. Speaking football with Glenn, you know, we talked football and baseball, et cetera. He was a Colorado Rockies/Denver Broncos fan.

Nelvis was -- more or less was not a sports-minded person. He was more into the nice lies, et cetera, and stuff like that we'd always talk about.

Q Speaking of work friends, is that how you would describe Ms. Lewinsky, as a work friend?

A Actually, I didn't work with her. It was a -- more of a "Hi, how are you doing" type thing. You really couldn't say we were friends. I mean, it was -- it was just she spoke to me and I spoke to her.

Page 63

A Well, again, you have to know Officer Byrne to know where he's coming from. He's very conscious about the job. He takes the job in full -- he wants to do a good job. And apparently this had bothered him, her showing up there quite frequently.

Q Were you all under any kind of -- when I say you all, I mean, uniformed or nonuniformed Secret Service -- under any kind of implicit or explicit instructions from anybody to notify senior staff when incidents like this occurred?

A No.

Q That is to say, when I say incidents, people hanging around too close to the Oval Office.

A No.

Q All right. Mr. Bittman had asked you some questions about Secret Service. Doesn't Secret Service -- and I'm not necessarily talking about uniformed -- don't they investigate some counterfeiting offenses?

A That's correct.

Q And also don't they have jurisdiction to investigate some credit card fraud type cases?

A That's correct.

Q Okay. That's all I have right now.

MR. BITTMAN: Mr. Fox, if you would stand outside, I'm going to ask the grand jurors if they have any questions

Page 66

Q Did you ever see her outside of the White House grounds?

A No, sir.

Q Did you ever talk to her outside of the White House grounds?

A No, sir.

Q On the day that you observed Ms. Lewinsky enter the Oval Office and stay in there, you said, for the rest of your shift, which was approximately 40 minutes, you said that the president came out and asked a question about a congressional staffer.

A It was a young congressional staff member.

Q A young congressional staff member. Is that a term, congressional staffer, that is commonly used in the White House for someone who works in the Office of Legislative Affairs?

A I would say that it would be -- that they would be referred to as a congressional staff, East Wing congressional staff, okay?

There's East Wing congressional staff, and in the West Wing there's the congressional staff over there, the big boys, the heavy hitters.

Q So that's a term -- that is, congressional staff, congressional staffer, is a term commonly used for people who work in the White House who work in matters related to

Page 64

for you.

(Witness excused. Witness recalled.)

THE FOREPERSON: Mr. Fox, I'd like to remind you that you're still under oath.

THE WITNESS: Yes, ma'am, I understand.

BY MR. BITTMAN:

Q Have you ever heard, Mr. Fox, Ms. Lewinsky being referred to as "The Stalker"?

A No.

Q Have you ever heard any rumors, other than from fellow uniformed officers, about Ms. Lewinsky hanging around the Oval Office?

A No.

Q The only people that ever told you about that were uniformed officers?

A That's correct.

Q How much did you associate with agents from the Secret Service?

A They're in their own little group, and the only way you would ever see them is maybe if you were at a restaurant or at the Outback or, say, one of the bars downtown, you might run into -- might run into somebody on the detail or stop by for a drink or something like that. Never really associated with any -- anybody.

Q In the last month have you talked to any other

Page 67

Capitol Hill?

A That's correct.

Q Okay. You also said that you gave a description after the president came out and asked about the congressional staffer that he was expecting. When the president reentered the Oval Office and shut the door, that you then made a comment -- actually, the agent came up to you and said, "What is he talking about?" and then you gave some description to the agent.

To the best of your recollection, tell us what you told the agent.

A I said, "Well, she's dark-haired." I said -- and I kind of went -- I kind of went like this (indicating), and then I said --

Q Indicating for the --

A Indicating a full-figured breast, I mean, basically, you know. And then I said, "And it widens out at the hips with baby fat." That was -- that was the statement I made.

Q And you previously indicated that she had dark hair. Any other description that you remember?

A That was just basically how I described her to him.

MR. BITTMAN: Sol, do you have any other questions? Go ahead.

BY MR. WISENBERG:

Page 68

[1] Q Did Nel, the steward Nel, did he ever discuss
 [2] Monica with you?
 [3] A Yes.
 [4] Q Tell us what he told you about Monica.
 [5] A Well, I was working over one night. It had to be
 [6] -- it was a Monday night. So I came up to the E 6 post, and
 [7] Nel at this time was kind of like -- I could see he was
 [8] uptight.
 [9] And I said, "Hey, Nel, how are you doing?" And he
 [10] kind of give me a head shake as if things weren't -- weren't
 [11] smooth. I don't know, again, whether it would have been
 [12] work-related or family-related. And he asked me, he said,
 [13] "Lew, did you work this weekend?" And I said, "Well, yeah."
 [14] I said, "I always work on the weekends."
 [15] He says, "Was Monica here?" I said, "I heard she
 [16] was here. I didn't see her, but I heard she was here." He
 [17] says, "I thought so."
 [18] And I didn't pry anymore. That was -- you know, I
 [19] could see that he was upset.
 [20] Q Okay. Did he ever have any other discussions with
 [21] you about Monica?
 [22] A Well, he had told me that she had called him in the
 [23] pantry, you know, a few times.
 [24] Q Did he tell you what she had called him about?
 [25] A No.

Page 69

[1] Q Any other conversations you remember with Nel about
 [2] Monica?
 [3] A No, just those.
 [4] Q You said that Nel liked ties, if I'm not mistaken.
 [5] Do you recall if he ever told you that Monica had given him
 [6] ties?
 [7] A No.
 [8] Q Do you remember him telling you that Monica had
 [9] ever given him gifts?
 [10] A No.
 [11] Q Do you -- and stop me if I'm breaching any
 [12] agreement you've reached with the Secret Service. But,
 [13] typically, if a person -- let's say you're at your post at
 [14] the 11:00 door, and a person were to come into the Oval
 [15] Office, whether or not the president's there, would you write
 [16] that down anywhere?
 [17] A The only people that would be -- that we would log
 [18] in a book would be the maintenance workers and the people
 [19] that would come over -- like Park Service employees who would
 [20] water the flowers, a radio address, the people that came over
 [21] to the Oval Office and removed the furniture, the White House
 [22] military people who would go in and make a phone check. On
 [23] every shift they would be logged in into that book.
 [24] It would only be people that were working -- I
 [25] mean, going in, as what I said, to water the plants, change

Page 70

[1] the flowers, to walk in checking the phones, or somebody that
 [2] would come in and take property out of the White House, which
 [3] you would log in the book and you'd have a little slip that
 [4] you would fill out that they removed six books or whatever.
 [5] I'm just saying --
 [6] Q Are you logging that in because they're removing
 [7] something, or just because of the kind of people they are
 [8] coming in?
 [9] A Well, workers, staff -- staff workers, resident
 [10] employees that would come over and do that.
 [11] Q Okay. So as far as you're concerned, your common
 [12] practice, that would not include an intern who might wander
 [13] in to the Oval Office, whether or not the president was
 [14] there, wander in to do some assigned work.
 [15] A Well, again, an intern would never get there
 [16] because of the fact that either Ms. Currie or Nancy would
 [17] have to be there.
 [18] Q Okay. But let's say in that situation you wouldn't
 [19] need to log them in. Is that what you're saying?
 [20] A That's correct. I wouldn't have to log them in.
 [21] Q You would not have to.
 [22] A No.
 [23] Q Okay.
 [24] MR. WISENBERG: I think that's all I've got.
 [25] MR. BINHAK: I just have a short question.

Page 71

[1] BY MR. BINHAK:
 [2] Q Did you know whether Nel and -- obviously, Nel, and
 [3] Monica knew each other because Nel referred to her by name to
 [4] you, correct?
 [5] A That's correct.
 [6] Q Do you know how Nel knew Monica?
 [7] A Not really, no. I mean, just in general
 [8] conversation, you know, he would tell me that -- again, after
 [9] she left there that she called back to the pantry, or the
 [10] other -- as I indicated, that he asked me if I'd worked that
 [11] weekend, and I told him yes. He wanted to know if Monica had
 [12] been there, and I said, "Well, I heard she was here," and he
 [13] said, "Well, I thought so."
 [14] And, you know, I didn't push him anymore because at
 [15] that point I could see he was upset.
 [16] Q When you said that she called the pantry, did she
 [17] come in person or did she call by phone?
 [18] A Called by phone.
 [19] Q Do you know how often Nel would have contact with
 [20] Monica?
 [21] A No, that's -- I have no idea.
 [22] Q Do you know any reason why Monica would know Nel?
 [23] A Only because he's the president's valet or, you
 [24] know --
 [25] Q Was it common for interns to know the president's

Page 72

[1] valet or stewards?
 [2] A Well, again, she wasn't an intern at -- you know,
 [3] she was a regular passholder, had the blue pass with a black-
 [4] and-white picture.
 [5] Q Was it common for junior level staff members with
 [6] blue passes to know the president's stewards or valets?
 [7] A Well, probably -- again, that if you spoke to them
 [8] and tried to get a relationship going or a friendship going,
 [9] yes, they would, you know, say, "Oh, I know that person,"
 [10] or -- or whatever.
 [11] Q Do many junior level staff members take the time to
 [12] speak to the president's valets and stewards?
 [13] A Well, again, when the president's there, they're in
 [14] this walkway, Walkway 1 area, pantry area, and it would be
 [15] nothing uncommon for some staff members or anybody, whether
 [16] -- probably to come down and ask for, "Hey, can you get me a
 [17] cup of ice," or, "Can you get me some presidential M&Ms,"
 [18] stuff like that, because Nel had access to those.
 [19] Q Now, you said that Monica Lewinsky was working in
 [20] the Congressional Affairs Office, and I think you said she
 [21] was in the East Wing?
 [22] A That's correct.
 [23] Q So she wasn't stationed in the West Wing of the
 [24] White House, correct?
 [25] A That's correct.

Page 73

[1] Q So when you say that people who would be around to
 [2] get a glass of ice or a cup of coffee or maybe some
 [3] presidential M&Ms, I guess you're presupposing someone that
 [4] would have a certain amount of contact with those people, and
 [5] therefore a certain amount of access to that portion of the
 [6] White House; is that correct?
 [7] A Or to that area, yes. It would not necessarily --
 [8] it could have been, you know, anybody that would walk in, a
 [9] staff member or a person working there would say, "Can you
 [10] get me some presidential M&Ms," you know.
 [11] Q So does that assume -- well, would it be common for
 [12] someone who worked in the East Wing to have that kind of
 [13] access and that kind of relationship with these people?
 [14] A No, you would say they were like removed. I mean,
 [15] again, from what I gathered from Monica, she had no problems
 [16] making friends. I mean, she would -- she never refused --
 [17] when I spoke to her, she always spoke back, you know.
 [18] I never really put her in the category of whether
 [19] she was -- not unfriendly, okay? She was a friendly type
 [20] person.
 [21] BY MR. BITTMAN:
 [22] Q Mr. Fox, have you ever been in the study?
 [23] A Yes.
 [24] Q How many times?
 [25] A Enough to know what was in there.

Page 74

[1] Q Have you been in the study during President
 [2] Clinton's administration?
 [3] A Yes.
 [4] Q What occasions would you go to the study?
 [5] A Just a lot of times just to -- just, you know -- a
 [6] lot of times the lights would be left on, et cetera, and you
 [7] know, you'd come on and you -- and you just like to walk
 [8] around when you maybe go on duty, and you'd walk in just to
 [9] make sure that the pictures were still on the walls and
 [10] things like that, kind of telling yourself -- make sure
 [11] everything was in the proper place and, you know, just a
 [12] general security check of that.
 [13] Q Did you ever look under the president's desk in the
 [14] study?
 [15] A No.
 [16] Q Okay.
 [17] MR. WISENBERG: I have a few questions.
 [18] BY MR. WISENBERG:
 [19] Q You mentioned when you were talking about Monica's
 [20] calls to Nel, I think you mentioned the words, "She would
 [21] call after she left there." I just want to make sure what
 [22] you meant.
 [23] Do you mean like after she left the White House?
 [24] A After she left the White House and went to the
 [25] Pentagon, yes.

Page 77

[1] A No.
 [2] MR. WISENBERG: That's all I've got.
 [3] MR. BITTMAN: Mr. Fox, you're excused. Thank you.
 [4] (The witness was excused.)
 [5] (Whereupon, at 12:00 noon, the taking of the
 [6] testimony in the presence of a full quorum of the Grand Jury
 [7] was concluded.)
 [8] * * * *

Page 75

[1] Q Okay. The weekend -- the incident that you've
 [2] spoken about where Nel asked you, "Was Monica here over the
 [3] weekend," was that during the time that she was still in
 [4] Legislative Affairs, or had she gone over to the Pentagon?
 [5] A No, she was still in Legislative Affairs.
 [6] Q Okay. Can you pin a date on it beyond that?
 [7] A It had to be -- probably had to be in like the
 [8] spring of '96, in the late winter, early spring of '96.
 [9] Q You mentioned that you would sometimes go into the
 [10] study to make sure everything was okay?
 [11] A Just a general security check.
 [12] Q Okay. When you would do that, how would you go in?
 [13] Where would you -- how would you gain entry?
 [14] A Well, generally I'd go through the pantry door,
 [15] through the two pantry doors, you know, go in, look in the
 [16] dining area, just -- just a general check, come in, look in
 [17] the study, general check, and then come out -- and then come
 [18] out through the 11:00 door.
 [19] Q All right. 11:00 Oval Office door, correct?
 [20] A Yes, sir.
 [21] Q You would do that when the president was not there?
 [22] A Yeah, just generally you'd take over the
 [23] assignment. Like of a morning, your morning shift, if you
 [24] were there like on the weekend, you'd take that over.
 [25] Q Okay. Would you ever go into the study if you knew

Page 76

[1] ie president was in the Oval Office area?
 [2] A Would not even think about it.
 [3] Q Okay. Because?
 [4] A Well, if I would have went in there, I would have
 [5] probably been transferred immediately.
 [6] Q All right.
 [7] A I would have been transferred out of the West Wing.
 [8] Q Okay. So that would be a major no-no.
 [9] A Oh, it would be a major no-no, yes.
 [10] Q Okay. What would you consider to be, based on your
 [11] knowledge, your experience in Secret Service, absolutely the
 [12] most private -- the private room in the entire West Wing in
 [13] terms of the sanctity of the president's privacy?
 [14] A Well, from previous -- again, from previous
 [15] presidents --
 [16] Q Just from President Clinton.
 [17] A Oh, okay. President Clinton, I would say the
 [18] study.
 [19] Q Mr. Bittman asked you things you had heard from
 [20] other Secret Service personnel, and I asked you about Nel,
 [21] and you told us about Nel.
 [22] Did any other people in the White House -- stewards
 [23] -- you know, you mentioned the other steward, Glenn.
 [24] A Glenn.
 [25] Q Did anybody else talk to you about Monica?

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/23/98

On below date, investigating Agents identified themselves, stated the purpose for the interview and interviewed M. KATHERINE FRIEDRICH at the Office of the Independent Counsel, 1001 Pennsylvania Avenue, N.W., Suite 490 North, Washington, D.C. 20004. FRIEDRICH provided the following:

FRIEDRICH, date of birth January 1, 1968, place of birth Worcester, Massachusetts, Social Security Account Number [REDACTED], currently resides at [REDACTED], [REDACTED], home telephone number [REDACTED]. FRIEDRICH is the Special Assistant to the Deputy National Security Advisor. Her office is located in the West Wing of the White House, First Floor, telephone number [REDACTED].

FRIEDRICH has been employed at the White House since July of 1992, when she worked in the Office of Administration (OA). FRIEDRICH left OA and came over to the National Security Council in June of 1995.

As Special Assistant to the Deputy National Security Advisor (NSA), FRIEDRICH's duties and responsibilities include scheduling for the Deputy, JIM STEINBERG, giving him up-to-date intelligence, and keeping him aware of late-breaking matters. FRIEDRICH also travels with the President on all international trips.

FRIEDRICH met MONICA LEWINSKY at a Christmas party held at LINDA TRIPP's home on December 20, 1997. LEWINSKY only stayed for a short period of time, and FRIEDRICH did not speak to LEWINSKY very much. FRIEDRICH described the party as small, and could only recall that aside from LEWINSKY and TRIPP, a LINDSAY Last Name Unknown from the Pentagon was present.

FRIEDRICH has been friends with LINDA TRIPP since 1994, when they were both employed at the White House. FRIEDRICH has socialized with TRIPP often, visiting TRIPP at TRIPP's home on numerous occasions.

In July of 1997, TRIPP told FRIEDRICH that LEWINSKY had told TRIPP that LEWINSKY was having an affair with the President. FRIEDRICH believed this, as there was no reason to doubt it.

Investigation on 2/20/98 at Washington, D.C. File # 29D-OIC-LR-35063
 by SA [REDACTED]
 SA [REDACTED] Date dictated 2/23/98

29D-OIC-LR-35063

Continuation of OIC-302 of M. KATHERINE FRIEDRICH . On 2/20/98 . Page 2

FRIEDRICH recalls speaking to TRIPP about this around the same time the KATHLEEN WILLEY story made news.

TRIPP told FRIEDRICH that she was taping telephone conversations TRIPP had with LEWINSKY in November of 1997. TRIPP told FRIEDRICH that TRIPP felt as though she would be the only person telling the truth, and TRIPP had to preserve the LEWINSKY story. TRIPP felt that TRIPP would be questioned about her conversations with LEWINSKY at a later time. TRIPP also told FRIEDRICH that she taped the telephone conversations because TRIPP felt that LEWINSKY could not tell the truth if she were deposed. TRIPP also felt that she had been treated badly after the WILLEY matter, and felt that no one would believe her unless she had hard evidence. FRIEDRICH advised TRIPP to bring all the tapes to TRIPP's lawyer's (KIRBY BEHRE) office for safekeeping. FRIEDRICH believed that there were ten or eleven tapes in all.

FRIEDRICH heard a portion of one tape that TRIPP played for her. This tape included a portion in which TRIPP yelled at her (TRIPP's) daughter. TRIPP felt concerned that this was on a tape that also contained conversations with LEWINSKY. FRIEDRICH advised TRIPP not to erase the tape, but to turn it over to TRIPP's lawyer. FRIEDRICH believed TRIPP did this. FRIEDRICH did not listen to or see other tapes. FRIEDRICH did not see the equipment TRIPP used to tape the telephone calls.

FRIEDRICH advised that TRIPP had a deposition set with PAULA JONES' lawyers in January. TRIPP felt she had no time to attend.

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 07/20/98

KATE FRIEDRICH, previously identified and previously apprised of the official identity of the interviewing Agent, was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, NW, Washington, DC, 20004. FRIEDRICH provided the following information:

FRIEDRICH works at the National Security Counsel (NSC) and has known LINDA TRIPP since 1994. The two met at the White House.

January of 1998 was the first time FRIEDRICH heard the name LEWINSKY. In August of 1997, FRIEDRICH was told by TRIPP about a girl who TRIPP was friends with, who was having a sexual relationship with President WILLIAM JEFFERSON CLINTON.

FRIEDRICH never heard about LEWINSKY wanting to get a job in the White House. FRIEDRICH never heard LEWINSKY's name mentioned at the NSC and, therefore, never mentioned anything about that to TRIPP. FRIEDRICH never heard about the circumstances surrounding LEWINSKY's leaving employment at the White House.

FRIEDRICH did not want to talk about the relationship between "MONICA" and CLINTON. FRIEDRICH listened to TRIPP, but discouraged that subject matter when it arose.

FRIEDRICH did fax a job posting to TRIPP, announcing a vacancy in SANDY BERGER's office. FRIEDRICH told TRIPP to call MARSHA DIMMEL, who handled job vacancies in the NSC. FRIEDRICH told DIMMEL that someone may be calling her. FRIEDRICH did not know who it was, but told DIMMEL that a friend of FRIEDRICH's, whom FRIEDRICH felt was bright, had recommended this person, who also worked at the Pentagon. FRIEDRICH told DIMMEL that her friend said her co-worker was "very good," and they were willing to work the difficult hours required by the job. FRIEDRICH has no idea if TRIPP called DIMMEL.

FRIEDRICH does not know anyone else who knew LEWINSKY. FRIEDRICH did not spend a lot of time discussing LEWINSKY with TRIPP. When FRIEDRICH met LEWINSKY at TRIPP's Christmas party in December of 1997, LEWINSKY said she had some interviews in New

Investigation on 07/17/98 at Washington, DC File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 07/20/98 [REDACTED]

29D-OIC-LR-35063

Continuation of OIC-302 of KATE FRIEDRICH . On 07/17/98 , Page 2

York.

FRIEDRICH advised that TRIPP was very upset with BOB BENNETT's comments about TRIPP. FRIEDRICH said she would not have spoken to a reporter. TRIPP said that ISIKOFF was harassing her, so she felt she had no choice. TRIPP made the tapes because she was trying to cover for herself. TRIPP felt she was going to be called by the PAULA JONES' attorneys.

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 04/07/98

ANDREW (NO MIDDLE NAME) FRIENDLY, white male, date of birth [REDACTED], place of birth [REDACTED], Social Security Account Number [REDACTED], currently resides at [REDACTED] home telephone number [REDACTED]. FRIENDLY was advised of the identity of the interviewing Agents and the purpose of the interview. FRIENDLY was interviewed in the presence of his attorney, DAVID WILSON. FRIENDLY provided the following:

FRIENDLY was hired in February of 1992 as a consultant for the CLINTON/GORE Presidential Campaign. FRIENDLY did advance work until the 1992 Presidential Election, and then was part of the transition team, based in Little Rock, where FRIENDLY also did advance work.

FRIENDLY served as President CLINTON's Personal Aide from January 21, 1993 until the end of October 1994. As Personal Aide, FRIENDLY was responsible for annotating the President's daily schedule, keeping the President on schedule, and traveling with the President.

FRIENDLY advised that every workday morning he received the President's schedule from the Scheduling Office. FRIENDLY would work from this document and annotate the schedule as the day went on. FRIENDLY explained that meetings would often be changed and rescheduled throughout the day. FRIENDLY would mark the schedule to reflect any changes he was aware of. FRIENDLY would also note the names of those who met with the President. Due to the large size of some meetings, FRIENDLY would be unable to note all participants at some meetings.

FRIENDLY advised that every afternoon two to four hours of "phone and office time" would be set aside for the President. FRIENDLY would move from his desk outside of the Oval Office to another desk he had down the hall. FRIENDLY did this so he could catch up on his paper work. FRIENDLY stated that if the President had visitors during this time, FRIENDLY would not be able to annotate the President's schedule to reflect the unscheduled meetings. Every week to ten days, FRIENDLY would

Investigation on 04/06/98 at Washington, D.C. File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 04/07/98

29D-OIC-LR-35063

Continuation of OIC-302 of ANDREW (NO MIDDLE NAME) FRIENDLY . On 04/06/98 . Page 2

forward the annotated schedules to ELLEN MCCATHERAN, the White House Diarist, by the White House mail. FRIENDLY advised that FRIENDLY did not go with the President to the White House residence after the work day.

FRIENDLY stated that he was responsible for keeping the President on schedule. If a meeting ran late, FRIENDLY would remind the President of the President's next engagement. FRIENDLY advised he would knock on the door of the meeting room if necessary to remind the President of the President's schedule.

FRIENDLY, as Personal Aide, would also travel with the President. FRIENDLY was responsible for the President's personal effects, including the President's briefcase. Before Presidential travel, FRIENDLY would meet with BETTY CURRIE, the President's Secretary. CURRIE would give FRIENDLY a list of the telephone calls that the President should make. FRIENDLY would keep track of the telephone calls the President made by marking this telephone log. FRIENDLY would, at times, speak telephonically with CURRIE, and CURRIE would inform FRIENDLY of names to add to the telephone log. FRIENDLY would return this telephone log to CURRIE at the end of a trip. FRIENDLY would also keep an annotated daily schedule during Presidential trips.

FRIENDLY was responsible for keeping track of gifts the President received while the President traveled. FRIENDLY would fill out a standard gift form, and then forward both the form and the gift to the White House Gift Unit upon his return to the White House.

FRIENDLY advised that he could recall meeting KATHLEEN WILLEY on one occasion. This meeting occurred sometime in 1993, outside of the Oval Office. FRIENDLY stated that he observed WILLEY to be sad, downcast, and had watery eyes as if she had been crying. WILLEY had a meeting with the President in the Oval Office. FRIENDLY advised that he believes he learned at that time that WILLEY was upset because her husband had killed himself. FRIENDLY stated that either KELLY CRAWFORD, BETTY CURRIE, or NANCY HERNREICH probably told that to him at the time. FRIENDLY could not recall WILLEY leaving the Oval Office, or if he had to knock on the door to remind the President of the President's schedule. FRIENDLY could not recall when, in 1993,

29D-OIC-LR-35063

Continuation of OIC-302 of ANDREW (NO MIDDLE NAME) FRIENDLY . On 04/06/98 . Page 3

this meeting occurred, and he could not recall annotating the President's schedule to reflect the meeting with WILLEY. FRIENDLY never saw WILLEY in the Oval Office again.

FRIENDLY advised that he was aware that WILLEY was a volunteer in the White House Social Office. FRIENDLY saw WILLEY at a couple of large White House events.

FRIENDLY stated he did not know, and had never met MONICA LEWINSKY.

FRIENDLY advised that he has not spoken with anyone in the White House Counsel's Office concerning WILLEY. FRIENDLY has not spoken with BOB BENNETT or DAVID KENDALL about WILLEY. FRIENDLY has spoken to KELLY CRAWFORD about WILLEY. [REDACTED]

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 04/24/98

MATTHEW FRITSCH, Lieutenant, United States Secret Service (USSS), Uniformed Division, was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, Washington, DC, 20004. Present for the interview were Associate Independent Counsel (AIC) MARY ANNE WIRTH, AIC MICHAEL TRAVERS and Department of Justice (DOJ) attorneys GARY GRINDLER and JONATHAN SCHWARTZ. FRITSCH was interviewed under the terms of an agreement reached between the OIC and the DOJ. After being apprised of the official identities of the interviewers and the nature of the interview, FRITSCH provided the following information:

FRITSCH has been employed by the USSS since July of 1976. FRITSCH has had a number of assignments at the White House, including one during the period from April of 1994 until August of 1996. FRITSCH worked in the Special Operations Division (SOD), which handled tours and special events handled at the White House. When FRITSCH worked in the SOD, he interacted with the White House Social Office and the White House Visitors section.

FRITSCH had an office in the Old Executive Office Building (OEOB), but spent most of his time in the ground floor of the East Wing.

FRITSCH first met MONICA LEWINSKY when she started working in the Office of Legislative Affairs (OLA). FRITSCH saw LEWINSKY a couple of times a week during this period. FRITSCH described his relationship with LEWINSKY as being friendly. FRITSCH described LEWINSKY as friendly and flirtatious. FRITSCH advised he and LEWINSKY spoke only about generalities and never about President WILLIAM JEFFERSON CLINTON.

FRITSCH advised that one of the Uniformed Division officers who was stationed at post [REDACTED] may have told FRITSCH that LEWINSKY and JOCELYN JOLLEY had been transferred out of the White House. FRITSCH believes the Uniformed Division officer who told FRITSCH this was FREMON MYLES. FRITSCH heard that LEWINSKY was transferred to the Department of Defense. FRITSCH did not know where JOLLEY was transferred. FRITSCH knew JOLLEY only to see

Investigation on 04/22/98 at Washington, DC File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 4/24/98

29D-OIC-LR-35063

Continuation of OIC-302 of MATTHEW FRITSCH, On 04/22/98, Page 2

her. FRITSCH has not spoken to LEWINSKY since she left employ at the White House. FRITSCH never saw LEWINSKY outside the White House.

Prior to LEWINSKY leaving employ at the White House, FRITSCH heard rumors from MYLES that LEWINSKY had "something going" with CLINTON. MYLES told FRITSCH that one of the White House cleaning people was told by one of the White House stewards that one of the stewards had cleaned up after CLINTON and LEWINSKY had been in the Oval Office. FRITSCH understood MYLES to mean the stewards saw a lipstick-stained tissue in an Oval Office garbage can.

LEWINSKY gave FRITSCH a Christmas card in either 1994 or 1995 and at the time she gave FRITSCH the card, she also hugged him.

FRITSCH advised he did not speak to anyone outside the USSS about the rumors about LEWINSKY and CLINTON. FRITSCH advised his supervisor in the SOD was Lieutenant BRYANT WITHROW. FRITSCH never discussed LEWINSKY with WITHROW.

FRITSCH knows JAMIE BETH SCHWARTZ and is friendly with her. FRITSCH gave SCHWARTZ a ride home on one occasion. [REDACTED]

FRITSCH never heard a rumor about CLINTON and LEWINSKY being caught in a compromising position.

FRITSCH played on a USSS softball team. FRITSCH has been to a bar called the "Bottom Line." FRITSCH does not recall seeing SCHWARTZ at the "Bottom Line." FRITSCH does not recall speaking about LEWINSKY and CLINTON at the "Bottom Line." FRITSCH knows a couple of women named NICOLE. FRITSCH does not know the name NICOLE MAFFEO.

FRITSCH does not know the name BAYANI NELVIS or GLEN MAES.

After January 22, 1998, FRITSCH heard rumors from other USSS employees about LEWINSKY and CLINTON being caught in the White House theater. FRITSCH discounted the rumors because the doors to the theater are locked and if the President was in the theater, the doors to the theater would be posted by USSS Agents.

FRITSCH drew the attached diagram which shows the layout of the White House theater area. [REDACTED]

29D-OIC-LR-35063

Continuation of OIC-302 of MATTHEW FRITSCH . On 04/22/98 . Page 3

[REDACTED]

The original diagram is located in an FD-340-b, along with the Agent's notes of this interview.

FRITSCH advised that TOM OWENS, a USSS Uniformed Division officer, works for FRITSCH. FRITSCH is aware that OWENS has been interviewed by the OIC about the LEWINSKY matter. OWENS said he was asked about CLINTON calling OWENS and discussing OWENS allowing LEWINSKY into the White House. OWENS said he never got that call.

Another rumor FRITSCH heard about LEWINSKY was that she would ask Uniformed Division officers about the President's whereabouts. FRITSCH advised BRIAN HENDERSON, a Uniformed Division officer, told FRITSCH that LEWINSKY would listen to the Uniformed Division officers' radios to determine the President's whereabouts. HENDERSON told FRITSCH that LEWINSKY was a little "wacky."

GARY BYRNE, a USSS Uniformed Officer, works with FRITSCH at the USSS training center in Beltsville, Maryland. BYRNE is upset about stories he has heard about BYRNE going to EVELYN LIEBERMAN about LEWINSKY and getting LEWINSKY fired. BYRNE told FRITSCH that BYRNE did not discuss LEWINSKY with LIEBERMAN.

FRITSCH advised that LIEBERMAN described herself as a "bulldog."

FRITSCH advised that another rumor he heard was that LEWINSKY showed up at the Northwest gate and became very upset when she could not get in to see the President. FRITSCH heard this rumor from Sergeant RON PARTHEMOR.

PREPARED BY	
DATE	

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

