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Documents Cited in Referral:
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 Bates Numbers 812-968



REFERRAL

TO THE

UNITED STATES HOUSE OF REPRESENTATIVES

PURSUANT TO

TITLE 28, UNITED STATES CODE, § 595(C)

**DOCUMENT SUPPLEMENT
D**

SUBMITTED BY

THE OFFICE OF THE INDEPENDENT COUNSEL

SEPTEMBER 9, 1998

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1506-DC-00000523 to 525	White House	1/21/96 Diarist notes
1506-DC-00000558	White House	Presidential schedule
1506-DC-00000559	White House	Presidential schedule
1506-DC-00000638	White House	Diarists notes, Presidential call
2004-DC-00000083	Bell Atlantic	Toll records
2004-DC-00000085 to 88	Bell Atlantic	Toll records
2004-DC-00000090 to 91	Bell Atlantic	Toll records
827-DC-00000018	United States Secret Service	2/24/97 to 12/28/97 Epass Access Control Report
CZ-DC-00000010	Driscoll, Richard	Fair market value appraisal
CZ-DC-00000016	Driscoll, Richard	Fair market value appraisal
DB PHOTOS 0004	Lewinsky, Monica	Blue Dress (photo)
DB PHOTOS 0044	Lewinsky, Monica	Audio-tapes from Monica Lewinsky's answering machine (originals in Quantico)
DB PHOTOS 0048	Lewinsky, Monica	evidence picture
DB-DC-000000017	Lewinsky, Monica	Draft letter from Monica Lewinsky to William Jefferson Clinton
DB-DC-000000022	Lewinsky, Monica	11/12/97 letter from Monica Lewinsky to William Jefferson Clinton
DB-DC-000000027	Lewinsky, Monica	Outline for job interests of Monica Lewinsky
DC-DC-00000004 to 5	Willis-Vento, Caroline	Fair market value appraisal
DF-DC-00000002 to 12	Lewinsky, Monica	2/1/98 handwritten proffer
MSL-1249-DC-0139 to 141	Lewinsky, Monica	Letter from Monica Lewinsky to William Jefferson Clinton

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<u>Bates # or Tab#</u>	<u>Production Name</u>	<u>Description</u>
MSL-55-DC-0001	Lewinsky, Monica	Draft note from Monica Lewinsky to William Jefferson Clinton
MSL-55-DC-0094	Lewinsky, Monica	Letter drafted on Monica's home computer
MSL-55-DC-0124	Lewinsky, Monica	Letter drafted on Monica's home computer
MSL-55-DC-0177	Lewinsky, Monica	Letter from Monica Lewinsky to William Jefferson Clinton
MSL-55-DC-0178	Lewinsky, Monica	Letter from Monica Lewinsky to William Jefferson Clinton
MSL-55-DC-0179	Lewinsky, Monica	11/2/97 letter from Monica Lewinsky to Betty Currie
MSL-55-DC-0184 to 186	Lewinsky, Monica	Note created on Monica Lewinsky's home computer "Happy National Boss Day?"
MSL-DC-00000456	Lewinsky, Monica	Handwritten note
MSL-DC-00000489 to 90	Lewinsky, Monica	Invitation to William Jefferson Clinton's Birthday Party
MSL-DC-00000621 to 22	Lewinsky, Monica	3/2/97 handwritten letter from Monica Lewinsky to William Jefferson Clinton
MSL-DC-00001050	White House	9/30/97 letter from Monica Lewinsky to William Jefferson Clinton
MSL-DC-00001051	Lewinsky, Monica	October 1997 Calendar
MSL-DC-00001051A	Lewinsky, Monica	November 1997 Calendar
MSL-DC-00001052	Lewinsky, Monica	Typed note
MSL-DC-00001166 to 1168	Lewinsky, Monica	Draft Affidavit
MSL-DC-00001176 to 1177	White House	6/29/97 draft letter from Monica Lewinsky to Marsha Scott
MSL-DC-00001192	White House	7/6/97 letter from Monica Lewinsky to Marsha Scott
MSL-DC-00001221	Lewinsky, Monica	Page from Monica Lewinsky's schedule book
MSL-DC-00001227	Lewinsky, Monica	6/29/97 note from Monica Lewinsky to William Jefferson Clinton
MSL-DC-00001228	Lewinsky, Monica	3/14/99 memorandum from Cliff Bernath for the Record
MSL-DC-00001230	Lewinsky, Monica	4/28/97 letter from Kenneth Bacon to Lorrie McHugh
V002-DC-00000001 to 5	Clinton, William Jefferson	1/27/98 letter from David Kendall to Bob Bittman, with attachments
V002-DC-00000006 to 7	Clinton, William Jefferson	1/28/98 letter from David Kendall to Bob Bittman

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<u>Bates # or Tab#</u>	<u>Production Name</u>	<u>Description</u>
V002-DC-00000008 to 15	Clinton, William Jefferson	President Clinton's Responses to Plaintiff's First Set of Interrogatories
V002-DC-00000016 to 32	Clinton, William Jefferson	President Clinton's Responses to Plaintiff's Second Set of Interrogatories
V002-DC-00000052 to 55	Clinton, William Jefferson	President Clinton's Supplemental Responses to Plaintiff's Second Set of Interrogatories
V002-DC-00000056 to 92	Clinton, William Jefferson	President Clinton's Responses to Plaintiff's First Set of Requests for Production of Documents and Things
V002-DC-00000093 to 116	Clinton, William Jefferson	President Clinton's Responses to Plaintiff's Second Set of Document Requests
V002-DC-00000159 to 160	Clinton, William Jefferson	2/2/98 letter from David Kendall to Bob Bittman
V002-DC-00000469	Clinton, William Jefferson	2/3/98 letter to Bob Bittman from David Kendall
V002-DC-00000471	Clinton, William Jefferson	Book, "The Presidents of the United States"
V002-DC-00000475	Clinton, William Jefferson	3/16/98 letter from David Kendall to the OIC
V004-DC-00000134	Akin Gump	11/3/97 to 11/4/97 Toll records
V004-DC-00000135	Akin Gump	11/4/97 to 11/6/97 Toll records
V004-DC-00000143	Akin Gump	11/26/97 to 11/27/97 Toll records
V004-DC-00000148	Akin Gump	12/11/97 to 12/15/97 Toll records
V004-DC-00000151	Akin Gump	12/19/97 to 12/23/97 Toll records
V004-DC-00000154	Akin Gump	12/30/97 to 12/31/97 Toll records
V004-DC-00000158	Akin Gump	1/5/98 to 1/7/98 Toll records
V004-DC-00000159	Akin Gump	1/7/98 to 1/8/98 Toll records
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V004-DC-00000161	Akin Gump	1/9/98 to 1/10/98 Toll records
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V004-DC-00000164	Akin Gump	1/15/98 to 1/16/98 Toll records
V004-DC-00000165	Akin Gump	1/16/98 to 1/19/98 Toll records
V004-DC-00000166	Akin Gump	1/19/98 to 1/21/98 Toll records

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<u>Bates # or Tab#</u>	<u>Production Name</u>	<u>Description</u>
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V004-DC-00000171	Akin Gump	12/11/97 visitor record
V004-DC-00000172	Akin Gump	12/19/97 visitor record
V004-DC-00000183	Akin Gump	12/8/97 Request for Messenger Service
V005-DC-00000058	Laughlin, Gayle	1/15/98 phone record
V005-DC-00000060	Laughlin, Gayle	1/20/98 phone record
V005-DC-00000061	Laughlin, Gayle	1/20/98 phone record
V006-DC-00000007	White House	4/9/96 to 12/30/96 WAVES report for Monica Lewinsky
V006-DC-00000008	White House	2/24/97 to 11/13/97 WAVES report for Monica Lewinsky
V006-DC-00000009	White House	12/6/97 to 12/28/97 WAVES report for Monica Lewinsky
V006-DC-00000020	White House	WH Personnel Action sheet for Monica Lewinsky
V006-DC-00000109	White House	Work history report
V006-DC-00000118	White House	Notification of Personnel Action
V006-DC-00000157	White House	White House Gift Record
V006-DC-00000158	White House	Gift Donor Information
V006-DC-00000159	White House	9/4/96 letter from William Jefferson Clinton to Monica Lewinsky
V006-DC-00000162	White House	White House Gift Register
V006-DC-00000167	White House	10/30/95 Gift Unit - draft letter
V006-DC-00000178	White House	Photograph
V006-DC-00000180	White House	White House Gift Record
V006-DC-00000181	White House	White House Gift Record
V006-DC-00000183	White House	Monica Lewinsky's resume
V006-DC-00000198	White House	1995 summer White House intern list
V006-DC-00000221	White House	5/30/97 schedule sheet
V006-DC-00000222	White House	6/10/97 e-mail from Marsha Dimel to Katherine Veit
V006-DC-00000223 to 224	White House	6/12/97 e-mail from Marsha Dimel to Roseanne Hill w/attachment

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<u>Bates # or Tab#</u>	<u>Production Name</u>	<u>Description</u>
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V006-DC-00000391	White House	WhoDB - Contact Manager Information
V006-DC-00000511	White House	12/5/97 Holiday Reception list excerpt
V006-DC-00000512 to 522	White House	12/5/97 White House Party list excerpt, report dated on 12/30/97
V006-DC-00000521	White House	12/5/97 White House Party list excerpt, report dated on 12/30/97
V006-DC-00000534	White House	6/14/96 Radio Address
V006-DC-00000572	White House	2/8/96 to 2/11/96 Presidential schedule
V006-DC-00000682	White House	8/18/96 and 8/19/96 William Jefferson Clinton Schedule
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V006-DC-00000747	White House	2/9/96 to 2/12/96 Presidential schedule
V006-DC-00001347	White House	4/9/96 E-Mail
V006-DC-00001770	White House	7/24/97 e-mail
V006-DC-00001792	White House	3/29/97 WAVES Request
V006-DC-00001796	White House	2/28/97 WAVES Request
V006-DC-00001813 to 1814	White House	12/5/97 e-mail: WAVES Operations Center to J. Schwartz
V006-DC-00001826	White House	Photograph
V006-DC-00001841	White House	Photograph
V006-DC-00001842	White House	Photograph
V006-DC-00001843	White House	Photograph
V006-DC-00001844	White House	Photograph
V006-DC-00001845	White House	Photograph
V006-DC-00001846	White House	Photograph
V006-DC-00001847	White House	Photograph
V006-DC-00001855	White House	Photograph
V006-DC-00001856	White House	Photograph
V006-DC-00001859	White House	Photograph
V006-DC-00001865	White House	videotape

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<u>Bates # or Tab#</u>	<u>Production Name</u>	<u>Description</u>
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V006-DC-00002065	White House	1/14/98 Presidential Call Log
V006-DC-00002066	White House	1/17/98 Presidential Call Log
V006-DC-00002067	White House	1/18/98 Presidential Call Log
V006-DC-00002068	White House	1/18/98 Presidential Call Log
V006-DC-00002069 to 2070	White House	1/19/98 Presidential Call Log
V006-DC-00002071	White House	1/21/98 Presidential Call Log
V006-DC-00002095	White House	8/16/97 schedule
V006-DC-00002130	White House	3/29/97 Presidential Movements
V006-DC-00002140	White House	7/4/97 schedule
V006-DC-00002142	White House	7/14/97 schedule
V006-DC-00002146	White House	8/16/97 schedule
V006-DC-00002147	White House	8/16/97 schedule
V006-DC-00002156	White House	11/13/97 Presidential Movement Log
V006-DC-00002158	White House	12/6/97 Presidential Movement Log
V006-DC-00002214	White House	7/4/97 diarist notes
V006-DC-00002243	White House	11/13/97 Diarist notes
V006-DC-00002287	White House	4/9/96 e-mail from Gunia to Dagenais
V006-DC-00002289	White House	E-Mail
V006-DC-00003646	White House	Coorespondence History tracking sheet
V006-DC-00003712	White House	2/24/97 memo from Betty Currie to William Jefferson Clinton
V006-DC-00003714	White House	White House Gift List
V006-DC-00003715	White House	White House Gift List
V006-DC-00003716	White House	6/14/96 Radio Address
V006-DC-00003719	White House	4/8/96 phone message
V006-DC-00003720	White House	2/28/97 Radio Address
V006-DC-00003735	White House	Photo Request

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<u>Bates # or Tab#</u>	<u>Production Name</u>	<u>Description</u>
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9/98 USNWR 1920
9/98 U.S. News & World Rep. 1920
1998 WL 8126910

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Rank 1 of 1

Database
USNWR

U.S. News & World Report
Copyright 1998

Monday, June 29, 1998

Vol. 124, No. 25

Outlook; **Washington Whispers**; Newsletter

The press on Brill on the press; Hooray for Hollywood; Hooray for the CIA; Operator, get me China; Life after Webb Starr unbowed, Clinton's favorite flicks, the star-struck CIA and more
Timothy Noah; Julian E. Barnes; Ted Gest; Marianne Lavelle; Kenneth T. Walsh; Marci McDonald; William J. Holstein; Gordon Witkin; Gary Cohen

The press on Brill on the press

Starr unbowed, Clinton's favorite flicks, the star-struck CIA and
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Like every other reporter in **Washington, Whispers** can't resist playing "gotcha" with Steven Brill, who wrote a much-discussed magazine article lacerating the media's Lewinsky sex-scandal coverage. Brill quoted with apparent approval CNN president Rick Kaplan's views on Monicagate excesses. But he somehow neglected to mention that Kaplan is a longtime friend of President Clinton's who (**Whispers** groupies will recall) told CNN staffers last fall to limit use of the word scandal in reporting on Clinton's 1996 campaign fund-raising. Brill's castigation of Kenneth Starr for talking to reporters made **Whispers** wonder whether the 21 other independent counsels ever dished. Here's what its survey found: Five independent counsels, including Starr, acknowledge talking to the press. Eleven claim they did not--or will not (but may of course be fibbing). The other six couldn't be reached; one of the six, James McKay, was accused of improper leaks during his investigation of Lyn Nofzinger and Ed Meese.

Incidentally, Brill's brouhaha doesn't seem to have dampened Starr's prosecutorial zeal. Last week, Bell Atlantic notified Robert Weiner, the spokesman for the White House Office of Drug Control Policy, that Starr had subpoenaed his phone records. Weiner's bit role in the scandal, Monicagate connoisseurs will recall, consisted of being questioned before the grand jury on phone calls he and his wife made to the Columbia, Md., Democratic Club to (he says) "congratulate" officials for their press release saying Linda Tripp

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uld be prosecuted under state law (for surreptitiously tape recording Monica Lewinsky). Weiner says Bell Atlantic told him Starr's office asked the company not to notify Weiner of the subpoena, but Ma Bell rejected this request on advice of counsel. Legal experts say this prosecutorial secrecy is extremely common in violent-crime cases, but less common in nonviolent cases. Bell Atlantic won't comment on any specific subpoenas, but company spokeswoman Sandra Arnette says, "It is our policy to notify a customer in the event we receive a subpoena, unless the subpoena specifically states not to."

Hooray for Hollywood. Who cares what the American Film Institute thinks are the best U.S. films of all time? Whispers wants to know what inveterate film buff President Clinton thinks are the best films of all time! It's widely known that Clinton's favorite movie is High Noon and that Clinton, like all other Homo sapiens, adores Casablanca. But here, for the first time anywhere, are the commander-in-chief's Top Five Picks: 1.) High Noon; 2.) Casablanca; 3.) Gone With the Wind (this one's a tad politically incorrect, but at least it's not The Birth of a Nation); 4.) Schindler's List (this one is arguably too politically correct); and 5.) The Bridge on the River Kwai (presumably President Clinton can explain what happens in this film's famously incoherent final 15 minutes).

ooray for the CIA. Still smarting from a public and congressional castigation for failing to predict India's nuclear tests, CIA brass hope to be rehabilitated by the Showtime cable channel. Showtime is filming a movie called The Agency at Langley, for which the CIA has agreed to provide 60 staffers as extras. When the call went out for volunteers to spend a Saturday strolling through the CIA lobby before the movie cameras, the response was so great that some departments had to hold a lottery to pick who could appear. (None of those chosen, thank goodness, were undercover operatives.) Whispers can't be more specific because--get this--the CIA says the precise number who clamored to be in the movie is classified.

Operator, get me China. Iridium LLC, a satellite communications company based in Washington, D.C., may have a more intimate link with a controversial Chinese military-related group than does Loral Corp. (which is currently getting barbecued by the New York Times and others for allegedly transferring too much rocket know-how to China). This is a little complicated, but bear with us: Iridium's Chinese partner, Iridium China (Hong Kong) Ltd., is managed by mainland-born Wang Mei Yue. Wang Mei Yue also happens to be head of China Aerospace International Holdings Ltd. (CASIL) in Hong Kong. CASIL is part of China's defense industrial complex, and is also where Liu Choying, the daughter of a top Chinese military official, was employed as a vice president; she is the figure who allegedly

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reled money to the Democratic Party. There are other ties between
IL and Iridium besides Wang: According to the South China Morning
Post of Hong Kong, three officials from CASIL sit on the board of
Iridium China. Iridium, which is ringing the globe with 66
low-flying satellites for mobile telephone use, needs a Chinese
partner to build and complete its global network linking 239
countries. Whispers can't help wondering whether some of that
satellite know-how is flowing from Iridium China to CASIL and somehow
improving China's military communications network. Iridium, Iridium
China, and CASIL all declined comment.

Meanwhile, Whispers hears that in early June, representatives from
the Treasury and Justice departments got together to discuss the
results of an investigation by the Office of the Comptroller of the
Currency (OCC). The OCC reported that over the past year or two,
hundreds of millions of dollars had moved from Chinese banks to
American banks, with no seeming explanation; the amounts of cash, and
the techniques used to move the money, have made investigators
suspicious. Those at the June meeting speculated that the funds
could have been stolen from the Chinese government, and there was
also chatter about possible tie-ins with the investigation of Chinese
contributions to the Democratic Party. Whispers has no idea whether
any of these suspicions are justified but would be glad to hear from
a one who knows what it's all about.

Life after Webb. Congressman Dan Burton's investigative committee
is poking into the political donations of Mark Jimenez, a Florida
businessman suspected of funneling South American money to the
Democratic National Committee. Several of Jimenez's employees
recently pleaded the Fifth Amendment when asked about their political
contributions.

E-mail address: whispers@usnews.com

"Why do you write such scathing articles about me?" "I don't
know."

Monica Lewinsky and Maureen Dowd, meeting for the first time at a
restaurant near Dowd's New York Times office

"There are always going to be leakers. The question is what do
guys like you and me do about them?"

Steven Brill, talking to a reporter about his magazine's attack on
Kenneth Starr's talks with the press (which Starr says weren't leaks)

"It tickled me to death. We may need to have a rejoicing
cemony."

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T. E. Smith, mayor of Bay Springs, Miss., where former Sunbeam
.irman Albert Dunlop closed two plants, on Dunlop's firing

"There was no kind of ethnic cleansing."

Slobodan Milosevic, president of Yugoslavia, denying widespread
reports of violence against ethnic Albanians in Kosovo

TABULAR OR GRAPHIC MATERIAL SET FORTH IN THIS DOCUMENT IS NOT DISPLAYABLE

Drawing: Frankly my dear ... uh, you gonna finish that jelly doughnut?
(Richard Thompson for USN&WR); Drawing: A little wobbly on 'nonpartisan' too.
(Tom Toles for USN&WR)

----- INDEX REFERENCES -----

COMPANY (TICKER): Bell Atlantic Corp. (BEL)

Word Count: 1131
6/29/98 USNWR 1920
END OF DOCUMENT

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Tab 48



U. S. Department of Justice

Office of Professional Responsibility

Washington, D.C. 20530

July 15, 1998

Mr. Donald C. Smaltz
Independent Counsel
P.O. Box 26356
103 Cronoco Street, Suite 200
Alexandria, VA 22313

Dear Mr. Smaltz:

In a December 5, 1997 letter to the Attorney General, you expressed concern about alleged comments attributed by the media to senior Department of Justice officials which were critical of yourself and other independent counsels. The Attorney General responded in a January 20, 1998 letter deploring such comments if they were in fact made and advising that your letter had been referred to this Office for review.

Your letter suggested that publication of the alleged comments could influence jurors hearing a case then pending or members of a future venire. The letter also noted the possible application of Rule 3.6 of the A.B.A.'s Model Rules of Professional Responsibility which bars attorneys from making extrajudicial statements having "a substantial likelihood of materially prejudicing" a pending case.

Based on our review of the excerpts you cited, we concluded that the alleged comments did not in these circumstances violate Rule 3.6 because their general nature made it unlikely that they would have "a substantial likelihood of materially prejudicing" any case. In particular, none of them disparaged any specific witness, item of evidence or prosecution theory. Rather, they pertained to matters then under active public debate.

In addition, Rule 3.6 applies only to lawyers "who [are] participating or ha[ve] participated in the investigation" at issue, a requirement no Department official meets. And while, by its terms, the rule's prohibitions extend as well to any "lawyer associated in a * * * government agency with [such] a lawyer," the rule still does not apply to Department officials since independent counsels are not part of the Department.

Because Rule 3.6 is inapplicable in this case and no other ethical rule appears to prohibit the reported comments, we must

conclude that no further inquiry into them by this Office is justified. This conclusion does not, however, mean that we found the comments to be appropriate.

If you have any questions, please contact me or Assistant Counsel Paul Colby on (202) 514-3365.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard M. Rogers".

Richard M. Rogers
Deputy Counsel

Tab 49

United States District Court

DISTRICT OF _____

TO: The White House
ATTN: Michelle Petersen, Esq.

SUBPOENA TO TESTIFY BEFORE GRAND JURY

SUBPOENA FOR:

PERSON

DOCUMENT(S) OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE United States District Court for the District of Columbia Third & Constitution Avenue, N.W. Washington, D.C.	COURTROOM Grand Jury, Third Floor
	DATE AND TIME July 23, 1998/9:15 a.m.

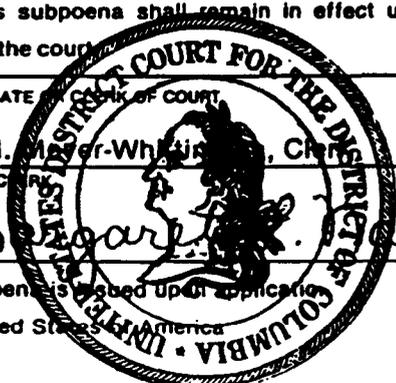
YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):*

See attached Rider.

Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

U.S. MAGISTRATE CLERK OF COURT Nancy M. [Signature] (BY) DEPUTY CLERK	DATE July 17, 1998 D1415
This subpoena is based upon application of the United States District Court for the District of Columbia.	NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY Julie A. Corcoran, Associate Independent Counsel Office of the Independent Counsel 1001 Pennsylvania Avenue, N.W., Suite 490-Nort Washington, D.C. 20004 (202) 514-8688



Subpoena #D1415

To: The White House

SUBPOENA RIDER

A. Produce the following items in the possession/custody of President Clinton:

1. Vox
2. The Notebook
3. Geek Love
4. Oy Vey
5. A Silver Cigar Holder, and
6. An Antique Paperweight depicting the White House circa 1900

Personal appearance is not required if the requested documents are delivered on or before the return date to Special Agent [REDACTED] of the Federal Bureau of Investigation (telephone [REDACTED], Suite 490-North, 1001 Pennsylvania Avenue, N.W., Washington, DC 20004, for submission to the Grand Jury. If you choose to deliver documents in lieu of a personal appearance, you must (i) state in a cover letter whether such production contains all responsive documents, and (ii) attach a copy of this subpoena to the cover letter.

Definitions and Instructions

1. Definitions

a. The term "document" or "documents" as used in this subpoena means all records of any nature whatsoever within your possession, custody or control or the possession, custody or control of any agent, employee, representative (including, without limitation, attorneys, investment advisors, investment bankers, bankers and accountants), or other person acting or purporting to act for or on your behalf or in concert with you, including, but not limited to, draft, pending or executed contracts and/or agreements, sample documents, insurance policies, financial guarantee bonds, letters of credit, communications, correspondence, calendars, daytimers, datebooks, telegrams, facsimiles, telexes, telefaxes, electronic mail, memoranda, records, reports, books, files (computer or paper), summaries or records of personal conversations, meetings or interviews, logs, summaries or records of telephone conversations

and/or telefax communications, diaries, forecasts, statistical statements, financial statements (draft or finished), work papers, drafts, copies, bills, records of payments for bills, retainer records, attorney time sheets, telephone bills and records, telefax bills and records, tax returns and return information, employee time sheets, graphs, charts, accounts, analytical records, minutes or records of meetings or conferences, consultants' reports and/or records, appraisals, records, reports or summaries of negotiations, brochures, pamphlets, circulars, maps, plats, trade letters, depositions, statements, interrogatories and answers thereto, pleadings, docket sheets, discovery materials, audit letters, audit reports, materials underlying audits, document productions, transcripts, exhibits, settlement materials, judgments, press releases, notes, marginal notations, invoices, documents regarding collateral or security pledged, settlement statements, checks disbursed or received at settlement, inspection reports, title policies, financial statements and/or federal tax returns submitted by any person in support of any loan application, items related the repayment, if any, of any interest or principal on the loan, items relating to any default on the loan, commission records, evidence of liens, documents relating to filings under the Uniform Commercial Code and/or its equivalent, foreclosure and mortgage documentation, cashiers checks, bank drafts, money orders, bank and brokerage account statements, debit and credit memoranda, wire transfer documentation, opening account cards, signature cards, loan applications, any employment and bank account deposit verification documents, loan histories, loan files, records of loan repayment or any and all efforts to secure repayment, including foreclosure or records of lawsuits, credit references, board resolutions, minutes of meetings of boards of directors, opinion letters, purchases and sales agreements, real estate contracts, brokerage agreements, escrow agreements, loan agreements, offer and acceptance contracts, or any other contracts or agreements, deeds or other evidence of title, escrow accounts and any other escrow documentation, savings account transcripts, savings account deposit slips, savings account withdrawal slips, checks deposited in savings accounts, checking account statements, canceled checks drawn on checking accounts, deposit slips and checks deposited into checking accounts, credit card accounts, debit and credit documentation, safe deposit records, currency transaction reports (IRS Forms 4789), photographs, brochures, lists, journals, advertising, computer tapes and cards, audio and video tapes, computerized records stored in the form of magnetic or electronic coding on computer media or on media capable of being read by computer or with the aid of computer related equipment, including but not limited to floppy disks or diskettes, disks, diskettes, disk packs, fixed

hard drives, removable hard disk cartridges, mainframe computers, Bernoulli boxes, optical disks, WORM disks, magneto/optical disks, floptical disks, magnetic tape, tapes, laser disks, video cassettes, CD-ROMs and any other media capable of storing magnetic coding, microfilm, microfiche and other storage devices, voicemail recordings and all other written, printed or recorded or photographic matter or sound reproductions, however produced or reproduced.

The term "document" or "documents" also includes any earlier, preliminary, preparatory or tentative version of all or part of a document, whether or not such draft was superseded by a later draft and whether or not the terms of the draft are the same as or different from the terms of the final document.

b. The term "communication" or "communications" is used herein in its broadest sense to encompass any transmission or exchange of information, ideas, facts, data, proposals, or any other matter, whether between individuals or between or among the members of a group, whether face-to-face, by telephone or by means of electronic or other medium.

c. "Possession, custody or control" means in your physical possession and/or if you have the right to secure or compile the production of the document or a copy from another person or entity having physical possession, including, but not limited to, your counsel.

d. The term "referring or relating" to any given subject means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is in any manner whatsoever pertinent to that subject including, but not limited to, documents concerning the preparation of other documents.

e. The term "you" means yourself and any of your companies, partnerships and business entities with which you have been affiliated and any employees, partners, associates or members of any firm with which you have been affiliated in the course of your work for any of the persons or entities named in this rider, and any such firms and the affiliates of those firms.

2. Instructions

a. The originals of all documents and communications must be produced, as well as copies within your possession, custody, or control.

b. If any original document cannot be produced in full, produce such document to the extent possible and indicate specifically the reason for your inability to produce the remainder.

c. Documents shall be produced as they are kept in the usual course of business, as organized in the files.

d. File folders, labels, and indices identifying documents called for shall be produced intact with such documents. Documents attached to each other should not be separated.

e. In reading this rider, the plural shall include the singular and the singular shall include the plural.

f. The words "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive. The use of the word "including" shall be construed without limitation.

g. In the event that any document, or portion thereof, called for by this subpoena is withheld on the basis of any claim of privilege or similar claim, that document shall be identified in writing as follows: (a) author; (b) the position or title of the author; (c) addressee; (d) the position or title of the addressee; (e) any indicated or blind copies; (f) date; (g) a description of the subject matter of the document; (h) number of pages; (i) attachments or appendices; (j) all persons to whom the document, its contents, or any portion thereof, has been disclosed, distributed, shown, or explained; and (k) present custodian. Each basis you contend justifies the withholding of the document shall also be specified. With respect to those documents or records as to which you may claim privilege, or attorneys' work product, set forth as to each such document the basis for such claim, including the purpose and circumstances surrounding the creation of the document, the identity of each person who has been privy to such communication reflected in the document, the identity of any person or entity instructing the subpoena recipient or the attorney of the subpoena recipient to withhold production of the document, and whether you will submit the document to the Court for an in camera determination as to the validity of the claim. If the existence of a joint defense agreement or any agreement as to common interest is relevant to the assertion of any claim of privilege or similar claim, please provide a copy of that agreement; if any such agreement is not in writing, please set forth the date of the creation of the agreement, the identities of all parties to the agreement and the

specific individuals who entered into the agreement on behalf of those parties, and the objects, purposes, and scope of the agreement.

h. In the event that any document called for by this subpoena has been lost, destroyed, deleted, altered, or otherwise disposed of, that document shall be identified in writing as follows: (a) author; (b) the position or title of the author; (c) addressee; (d) the position or title of the addressee; (e) indicated or blind copies; (f) date; (g) a brief description of the subject matter of the document; (h) number of pages; (I) attachments or appendices; (j) all persons to whom the document, its contents, or any portion thereof, had been disclosed, distributed, shown or explained; (k) the date of the loss, destruction, deletion, alteration, or disposal and the circumstances thereof; and (l) the reasons, if any, for the loss, destruction, deletion, alteration, or disposal and the person or persons responsible.

i. If any information or data is withheld because such information or data is stored electronically, it is to be identified by the subject matter of the information or data and the place or places where such information is maintained.

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Tab 50

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SHOW: HARDBALL WITH CHRIS MATTHEWS (8:00 PM ET)

July 22, 1998, Wednesday 2:05 PM

LENGTH: 4456 words

HEADLINE: WHETHER MONICA LEWINSKY COULD HAVE SPENT TIME WITH THE PRESIDENT AND
THE ISSUE OF IMPEACHMENT

ANCHORS: CHRIS MATTHEWS

BODY:

Mr. LEON PANETTA (Former White House Chief of Staff): (From March 30)
There's also a group within the White House that thinks that playing hardball is the way you deal with these issues, and that ultimately if you--if you stonewall these things, they'll go away. I just ha--in--in my history in politics in Washington, my view is nothing goes away in Washington. If you try to stonewall things, ultimately it catches up with you. It is much better to be forthright. And those are exactly the words that I often would tell the president.

CHRIS MATTHEWS, host:

Time marches on. We have Leon Panetta with us from San Francisco. I wish I was up there with you today. Leon, thank you for joining us.

Mr. PANETTA: Yeah, I'd like to have you here, Chris.

MATTHEWS: Thank you.

Mr. PANETTA: My pleasure.

MATTHEWS: Well, let's talk about--would those be your words today in speaking to the president?

Mr. PANETTA: Well, I think--you know, as--as--at the time that I said the president ought to come forward, I thought that was one way to try to hopefully end this kind of long nightmare we've been through with this scandal. And, you know, it's--right now, as I look at the special prosecutor and some of the things he's done over the last few weeks, particularly with regards to the Secret Service, which concern me a great deal because of what it did, I think, to increase the jeopardy to--to a president's life by virtue of--of the testifying that's gonna go on here. I'm just not so sure that, perhaps, the president may not be better off right now waiting and seeing what--what the special prosecutor develops and listening to his lawyers. But at some point, there's no question that he's gonna have to come forward and he's gonna have to be forthright about what happened.

MATTHEWS: I agree with you about the Secret Service, but let me ask you about--maybe you--I wanna give you some time here because we rarely have

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somebody on the program who's been in the White House--in the Clinton White House--right--intimately with the president and can describe the sort of culture of the place. It just seems to me, from the outside and being politically I--political, I noticed--it seems to me the president and there's--would seem to be a lot of young people around.

I mean, then some grownups like yourself, Erskine Bowles now, Mack McLarty, that you guys seem to be the odd people out, however, the grownups. It seems like the president and the kids seem to have this thing going on there and it's kind of casual and loosey-goosey, and you guys tried to enforce some discipline on it, but normally, this president seemed to have a sort of a whimsical idea that he could fun with the younger staffers and hang out with them and enjoy their tunes and stuff, thinking about tomorrow, whatever he sings when he sings their songs. It doesn't--it seems like a kind of a--a juvenile culture that he seems to enjoy to sh--joy sharing in. Is that fair?

Mr. PANETTA: Well, Chris, I think you have to go back to how this developed. At--at the--at the beginning of the administration, they took a long time selecting the Cabinet and spent most of their time really focusing on those that they wanted within the Cabinet. And suddenly they were at the inauguration day and realized that they had not spent very much time on developing a White House staff. And as a consequence, they relied a lot on people who came out of the campaign--and as you know, sometimes somebody can be very good in a campaign, but have very little experience in terms of Washington and the White House and the responsibilities to the White House.

So I think part of the problem was that not enough time was spent in selecting the people that ultimately went into the White House and they were for--in large measure, younger, they were less experienced and I think a lot that contributed to the initial problems. I do have to tell you that I think as a result of the work that I did, that Erskine Bowles did--I think the discipline within the White House increased a great deal, so that that was not as much as a problem as it was the first two years. As far as the president's concerned, president loves, obviously, to--to mix with people. He's a people person. That's what got him into the presidency. He likes young people and he likes old people. I mean, I've never seen a person who doesn't like to engage when you're in the presidency. He loves to meet people and he loves to talk with people, and that's his nature.

MATTHEWS: Well, when you--when you talk on--took on the chief of staff's job and you, in a way, were stepping down from an enormous policy role of--of being OMB director and having been chairman of the House Budget Committee and a major Democrat on Capitol Hill, you took a staff job, in a sense, of being chief of staff with the promise that you'd be the traffic controller, that you would stop some of the g--more zanier characters, some of them who appear on my show, I must say, from getting into the White House to bother the president, that you would be traffic controller and make it more of a corporate kind of setting. How did Monica Lewinsky get through the gate? How did she get to be a person who on a regular basis would bring so-called materials to the president as if she were a Federal Express messenger? I worked in the White House. We had to take our papers down to the basement and then a Marine would take them to the president. It was very formal. The idea that Monica could be bopping around there on a Saturday and just bop in and see the president, drop off some papers. It doesn't seem like the American presidency that I was used to working in.

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Mr. PANETTA: Well, Chris, there were three things that I wanted to do when I came in as chief of staff. The first was to basically set up a line of command. There wasn't an--an organization chart at the time I--I went in as chief of staff. And it was important to set up lines of command and I set up my deputies, and under them, every person was responsible to those deputies so that we really had a legitimate chain of command similar to what I had learned about in the Army. It's be--sometimes it's better to have Army experience when you're working in the White House than--than just simply either management or--or, for that matter, even political experience.

Secondly, it was a question of increased discipline. And there, you know, it's the issue that you're talking about--not having people simply wander into the White House. And we did increase the--the discipline on that. Staff members were not to simply wander into the president's office. They--they were to abide by a schedule. If they had a briefing to give the president, then they would be part of the briefing. I determined who would go in for the--for--for purposes of those briefings...

MATTHEWS: Right.

Mr. PANETTA: ...who would meet with the president. But let's understand that the president also has the flexibility to determine, you know, if he wants to meet with somebody at a particular time, either in the White House or in the Oval Office, and wants to have somebody meet with him on a personal basis. He has the ability to do that.

MATTHEWS: How common would it be for an intern--a young intern in her early 20s who has no sort of professional skill to have direct contact with the Oval Office?

Mr. PANETTA: Never be...

MATTHEWS: I've never heard of such a thing in my life.

Mr. PANETTA: Well, it would be...

MATTHEWS: I think you have to be professional to get anywhere near the president.

Mr. PANETTA: It's unusual. Well, and that--and that--that's my view as well. I think with regards to interns, as I've mentioned before, interns generally come into the White House. They're young. They're inexperienced. They don't know, you know, what's important, what's not important. They have no sense of proportion, because they are young.

MATTHEWS: Right.

Mr. PANETTA: And so as a consequence, with interns, what you wanna do is--I'm sure you wanna give them access so--in the sense of seeing how the White House operates. We did the same thing on Capitol Hill, again, as you know, Chris...

MATTHEWS: Right.

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Mr. PANETTA: ...with having interns open mail and be in the office and have a little sense of what it was like to--to operate in a--in a congressional office. Well, you do the same thing in the White House, but most of the interns operated in the old Executive Office Building.

MATTHEWS: Right.

Mr. PANETTA: Very few operated within the confines of the White House itself.

MATTHEWS: How did this one get through? Mr. Panetta--Leon--Leon, you're a great, clean guy. I still think you're probably as confused as I was. How in the world did this young intern get to be friends with the president of the United States?

Mr. PANETTA: Well, hell, you're--that's the whole case that you're talking about, Chris.

MATTHEWS: OK. Let me ask you this. When Evelyn Lieberman, your deputy, booted her over to the--to the Pentagon to get her out of the way, what paper passed by you? Did you get any kind of in--any kind of red light here or yellow light this girl was trouble, she was a stalker, she was hanging around the president, he's getting teased by her or anything like that?

Mr. PANETTA: Well, Evelyn Lieberman was--as the public needs to know, was one of my deputies. She was deputy chief of staff, and she was responsible for overseeing personnel and working on the schedule as well. And there was no finer first sergeant...

MATTHEWS: Right.

Mr. PANETTA: ...in the White House than Evelyn Lieberman. And so she would be responsible, frankly, for telling staff members or interns or whoever if they were in the wrong place at the wrong time, if they weren't in the proper dress. She would discipline them. She would discipline members of the press as well...

MATTHEWS: Right.

Mr. PANETTA: ...if they were in the wrong place. So she was good at that. And she would usually come to me and she'd say, you know, Look, I did this and I did that, and I'd back her up 100 percent. In this case, she came to me and she said, There's this individual. She's hanging around--inappropriately around the--the Oval Office. I wanna get rid of her and I'm gonna get rid of her.' And I said, Fine. Let's do it.'

MATTHEWS: You didn't have to check it out with the president.

Mr. PANETTA: No, no, this was--this wa...

MATTHEWS: You ne--you never checked it.

Mr. PANETTA: No, sir.

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MATTHEWS: And what was the--what was the defining issue here of why she was moved to the Pentagon?

Mr. PANETTA: Ev--Evelyn Lieberman. When--when she says somebody's gotta move, it's OK with me.

MATTHEWS: And you didn't have any idea who this woman was at the time, this young girl?

Mr. PANETTA: Nope.

MATTHEWS: You never heard of Monica Lewinsky?

Mr. PANETTA: Well, I mean, I--I--from now--now--now...

MATTHEWS: Did she have a reputation of being something of a space cadet?

Mr. PANETTA: Now--now do I--do I remember her? You know, yeah.

MATTHEWS: Does this--I mean, I would know if a spa--I would--I know, but I would remember if a space cadet were wandering around my office.

Mr. PANETTA: No. Exactly.

MATTHEWS: And--and I'd say, Who's that? What's she up to? She seems to have a lot of crazy stuff on her mind, 'or, She seems to be in love with somebody here or something.' I mean--and this--we've seen these talking points where the word stalker' was used and huge liar.' She's used them about herself. So I don't know. And they were on her mainframe computer. It isn't like it's being denied.

Mr. PANETTA: Chris...

MATTHEWS: And here's a woman who's willing to say those things that--she sounds a little bit odd. But I want to get back to the president, because you said he set the tune. He liked a lo--a lot of young people around and they made him feel breezy or they would--they relaxed him or whatever, you--you suggested. And you said you really couldn't control that part of him. But I wanna ask you this: Are there anybody--are there any interns assigned the duty of coming to see the president on Saturday with papers of any kind? Have you ever come across an intern with that kind of duty roster?

Mr. PANETTA: No, of course not.

MATTHEWS: OK. We'll be back with more HARDBALL on CNBC.

(Announcements)

Mr. PANETTA: (From "Meet the Press") I have to tell you that perjury about consensual sexual relations doesn't strike me as being an impeachable offense and I don't think it strikes most of the members of Congress as being an impeachable offense.

MATTHEWS: Mr. Panetta--Leon Panetta, where would you place such an offense? I mean, we were talking about the allegations that the president may have

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engaged in a relationship with a 21-year-old intern, sort of in a loco parentis situation with him. He was en--she was entrusted to him by her parents in a situation where she was working among adults, but hardly seen as an adult but as an intern. If there wer--if ther--if there was an intimate relationship between these two people, you say it's not impeachable. What is it then? How should Congress and the American people respond to evidence?

The latest polls in The Wall S--in The Washington Post and AB--ABC poll, that very clearly shows over 60 percent of the people believe the president had this relationship, that nobody's charging him with rape, obviously. It's a consensual relationship, but they're also charging him with--or most people believe that he--that he lied about it when he was under oath. And a lot of people can understand that, too. I have to tell you that. A lot of people I talk to say, Hey, people cover up infidelity. It happens all the time.' What do we do with this case, though?

Mr. PANETTA: Well, Chris, you know--I mean, you--you and I have, obviously, a standard that goes back to our backgrounds. You know, I'm a pre-Vatican, too, Catholic. I was raised by--taught by...

MATTHEWS: You're not that old, Leon.

Mr. PANETTA: I was taught by nuns and priests and fear of...

MATTHEWS: Right. Well, you had the Jesuits like I did, and they can get through anything.

Mr. PANETTA: Yeah.

MATTHEWS: So what do we do--what do we do--what do we do with the pr--should the Congress just simply say, if they get a report--and this evidence is accumulating--should they simply say, Well, we'll pass a resolution or we'll all give speeches in one minutes, and that'll be the end of it'? If you can't impeach the guy, you give a nice speech or issue a press release? What do you do?

Mr. PANETTA: Well, you know, Chris, I think we all have to kind of stand back and see, you know, what this thing looks like. Look, if--if the special prosecutor can't prove obstruction of justice for whatever reason and he can't prove subornation of perjury for whatever reason and the only charge he has is that the president lied about a sexual relationship--consensual sexual relationship, however you wanna describe it, within the White House, and that's the only charge that goes forward to the House of Representatives, I just have to tell you, you know, again, when you look at the whole picture, is that, in and of itself, an impeachable offense? I don't think so. Now, you know, how the House--what the House does and how they make that determination is something we're gonna have to see. But, clearly, whether they decide to go with a censure, whether they decide to go with something f--something less is something that the leadership of the Congress as well as the members are going to have to decide.

MATTHEWS: Did you know Kathleen Willey at the White House, Leon?

Mr. PANETTA: No, I didn't.

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MATTHEWS: What do you make of that case, where the president's accused by--these talking points clearly are--three-quarters of which are aimed at covering up whatever the president's conduct, or shaping the testimony of Linda Tripp with regard to the conduct of the president in--in with--with Kathleen Willey, a grown-up who came looking for a job in a somewhat bad situation. Her husband was about to commit suicide. She sought a job. She accused on "60 Minutes," we all saw it, the president of the United States of gross behavior toward her. Of course, gross behavior is gross behavior. But if he acted illegally to try to bring a--to shape or tamper with witnesses in their testimony, would that reach, do you think, the standard of an impeachable offense?

Mr. PANETTA: Well, again, you--you know, Chris, we--we have to see what the special prosecutor ultimately determines here as he looks at the evidence an--and this investigation wraps up what--whatever evidence they're--they're able to pull together. But, clearly, if--if some kind of obstruction of justice, where the president in some way deliberately made efforts to prevent or inhibit somebody in--in the course of an investigation...

MATTHEWS: Mm-hmm.

Mr. PANETTA: ...or a criminal offense, then I think that's a more serious charge. I do...

MATTHEWS: Yeah.

Mr. PANETTA: There's no question in my mind.

MATTHEWS: Remember Rose Mary Woods? She worked for--well, one of your old bosses, Richard Nixon, back when you were in civil rights enforcement, and you quit as a matter of honor, we all remember, 'cause you didn't think they were enforcing civil rights in the Nixon administration. Remember Rose Mary Woods? She was accused of--in fact, she took the bullet for it. She said, Yeah, I--my--my leg reached over about 20 feet across the room and--and killed about 18 minutes of Watergate tape.' And she took the bullet.

Mr. PANETTA: Yeah. I remember the pictures.

MATTHEWS: Yeah. I remember those cartoons. I sometimes think of Betty Currie, although she's--well, she's just as political as Rose Mary Woods is. Rose Mary Woods was a loyalist and a real politician, and I don't wanna say--and nobody really thinks that Betty Currie was some sort of--just a clerk or a clerical person. She had a tremendous political background and loyalty. What i--what is her role here? I mean, is she supposed to just sort of say, Well, I'll tell them what I have to tell them, but no more. I'm gonna try to be loyal an--and deal with it as best I can, but I've gotta worry about breaking the law myself'? I mean, she's going to be asked if--if she was out giving gifts to Monica Lewinsky, if she was trying to get--on her own initiative, trying to get Monica Lewinsky's--jobs up with Ron Perelman up--who runs the Revlon company, out--I mean, these are incredible reaches, it seems to me, for an assistant to--to about--to undergo or undertake without some sort of push from the boss, you know. Why is she out getting--running an employment service for Monica Lewinsky? It seems odd.

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Mr. PANETTA: Well, Chris, look...

MATTHEWS: Doesn't it?

Mr. PANETTA: Yeah. Let me just tell you, my relationship with Betty Currie in--in the White House--I don't know of anybody who is more honest or decent than--than Betty Currie. She's just the most decent person I've ever met, particularly in that kind of position. You know, most of the time, people in high office will hire hit-and--hit-and-run people to--to run the--run the shop and really s--really shut the door on people.

MATTHEWS: Right.

Mr. PANETTA: Betty was not that kind of individual. She was very different. She as always nice to everybody who came through. She was always listening to--to whatever the president wanted to do. She was that kind of person. And whatever she's testified to, there's no question in my mind that she's testified to the truth.

MATTHEWS: Ed Rollins, join in.

Mr. ED ROLLINS (Republican Strategist): Well, th--I think--first of all, I have the greatest respect in the world for Leon, who I've known for many, many years, and--and having been raised by the Dominican nuns, I--I--I have a certain moral compass, too. I think the most...

MATTHEWS: We're gonna have to have a Knights of Columbus meeting later tonight.

Mr. ROLLINS: Right. I--I th--I think the most--I think the most telling comments tonight, Leon, is you talking about how you did try and put a discipline in this White House. This girl got around that discipline, and obviously, interns didn't float in and out of...

MATTHEWS: It takes two to tangle.

Mr. ROLLINS: Y--you know, interns didn't float in and out of the White Houses I worked in.

MATTHEWS: Right.

Mr. ROLLINS: But the reality is that--that this president had to basically want to see this girl and everybody else responded either negligently or--or positively. The bottom line: If this was a college president instead of the president of the United States, a married college president, and he was caught messing around with one of his students, there's no question he'd be fired. Whether the president should be fired or not, I think, is gonna ultimately depend on the evidence that you--you talked about today. But I think that this...

MATTHEWS: OK.

Mr. ROLLINS: ...I think this is a serious issue.

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MATTHEWS: Ed--we'll be back with Ed Rollins and Leon Panetta in just a minute on HARDBALL on CNBC.

(Announcements)

MATTHEWS: Well, let's commit what I like to call substance abuse. Let's talk about some substantive issue. Leon Panetta, you were chairman of that--chairman of the--or, actually, director of the OMB, as well as chairman of the House Budget Committee. There's a big fight brewing between now and Election Day and I guess it's the most important political fight of the year, apart from this whole question, and that is, what do we do with this surplus that seems to be building up, at least potentially? The Republicans want a huge tax cut of up to--up to \$ 700 billion over 10 years. The Democrats under Bill Clinton say, 'You've gotta save that money to preserve Social Security.' What do you make of that fight?

Mr. PANETTA: Well, Chris, let me tell you something, having been involved in that battle to get to a balanced budget and having worked on the economic plan. Now that they've reached a balanced budget, they have to remember that they've got a \$ 5 trillion debt out there.

MATTHEWS: Yeah.

Mr. PANETTA: We're still picking up about \$ 1 billion a day on interest on that kind of debt. The smartest thing they could do is to put that surplus away, pay off the debt and not start spending it, because the reality is, in a few years, when the baby boom generation hits, we're gonna be back in a deficit, so I think both sides, frankly, ought to back off, let the surplus be used to pay off the overall debt. How that winds up, I don't know. You know, it's a political year. The likelihood is we may get the worst of all worlds, which is a tax cut, plus what--what the president wants to spend it on.

MATTHEWS: I g--I--I guess--what would be the estimate for how much the federal government's spending in interest now, about \$ 400 billion a year?

Mr. PANETTA: Sure, it's about...

MATTHEWS: About 8 percent?

Mr. PANETTA: Actually, that's e--that's--that's exactly right. It's--it's--it's over \$ 1 billion a day in interest that's accumulating. That's crazy. We are not in some kind of, you know, totally balanced budget situation. We are in a situation where we've got a huge national debt. It continues to accumulate and it's--it's great that we've reached a balanced budget, and I think it's to the president's credit, Congress' credit that we're there.

MATTHEWS: And your credit.

Mr. PANETTA: Well...

MATTHEWS: You were budget director.

Mr. PANETTA: ...I'll--I'll take...

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MATTHEWS: And I love the way...

Mr. PANETTA: ...I'll take some credit of it.

MATTHEWS: Leon--Leon, I love it when you talk conservative. Anyway, let's go to Ed Rollins. What do you make of that? You can't beat Leon for fiscal--fiscal responsibility. He's a real grown-up. What do you make of the other guys down in Washington?

Mr. ROLLINS: I--I--I--I think we've gone full circle. He's now a Republican again. That's where he s--that's where he star--we both started as young Republicans. The...

MATTHEWS: Somebody's accused me of that recently, too. Go ahead.

Mr. ROLLINS: I--I--I think--I think the bottom line is this, though: I--I think that if the president wants to increase Social Security taxes, he should put a bill through Congress because, obviously, if he takes the--the surplus today and dumps it into Social Security--I mean, I think that's--that's a--that's a false way of raising taxes. I think Republicans feel this is taxpayers' money. If we're not gonna spend it all, then they ought to give it back to taxpayers.

MATTHEWS: Well, politically, what do you think's the smart move? You go out today--you look at all the polls and people are saying they're most concerned, even though it's 1998 and the economy's rolling, thanks to some smart fiscal and monetary decisions of the last seven or eight years--but the fact of the matter is that people still have a real sensitivity--and you know it as well as I do--about Social Security.

Mr. ROLLINS: Sure.

MATTHEWS: They know that this boom ain't gonna last. At some time in the early part of the next century, people like you and I are gonna be out there trying to get our checks, and the fact of the matter is there ain't gonna be a whole lot of money there compared to the number of people waiting in line.

Mr. ROLLINS: Well, then you need to change the system. I mean, I think--I think that's the--that's the argument that people have to make here, is that we--the system will be underfunded because there won't be enough people paying into it. Let's not play funny games. We played gimmick games with the budgets all during the deficit years. Now that we have a little bit of surplus--and I agree with Leon totally--the surplus may be there for a short period of time, not a long period of time. You know, let's do something fiscally responsible. We either give it back to the taxpayers or basically don't spend more money. But I--we have to fix the Social Security system by other--other means than just dumping more money in there, though.

MATTHEWS: Mr. Panetta, do you think the president was smart in coming out for teaching character in high school? Was that a shrewd move this week?

Mr. PANETTA: Absolutely. I think--I think it's...

MATTHEWS: I mean, pushing--he--he's--he's talking up school uniforms and...

CNBC News Transcripts, July 22, 1998

Mr. PANETTA: Yeah.

MATTHEWS: ...he's sort of offering himself as the national hall monitor, and I think--I'm just wondering if that's an odd sort of juxtaposition with what's going on in the rest of his life these days.

Mr. PANETTA: Well, the president has had a pretty consistent record in the White House of going after that kind of issue, of doing the school uniforms, of arguing for greater discipline, as well as for additional funding in--in education. So I--I think--you know, he--he's had--and it probably goes back to the time when he was governor at Arkansas, but I don't think there's any question but that the American people respond...

MATTHEWS: OK.

Mr. PANETTA: ...to the whole issue of better discipline in schools.

MATTHEWS: Leon Panetta, thanks for joining us from San Francisco. Great man.

Mr. PANETTA: Thank you.

MATTHEWS: "Rivera Live's" up next with the latest on the Clinton investigation. Join me next time for more HARDBALL.

LANGUAGE: English

LOAD-DATE: July 23, 1998

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Tab 51

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Meet the Press
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Sunday, July 26, 1998

Interview: Rahm Emanuel, adviser to President Clinton, discusses the Ken Starr investigation and managed care

MR. RUSSERT: And we're back. Rahm Emanuel, welcome.

MR. EMANUEL: Good morning.

MR. RUSSERT: As you heard, I just reported that the suspect, Russell Weston, was seen outside the White House on Thursday and again on Friday. And according to senior law enforcement officials, after he was wounded, he was mumbling President Clinton's name.

MR. EMANUEL: Mm-hmm.

MR. RUSSERT: What do you know?

MR. EMANUEL: I mean, I know what you reported; I know what I've read in the paper. We've had--Chuck Ruff in the counsel's office has been briefed by Secret Service, and then I think there's been some information, but that's about--I think what the public has is the correct information as we know it right now.

MR. RUSSERT: Do you think incidents like this bolster the head of the Secret Service, Lou Merletti's, comments and attitudes that things like this can happen within moments and all the more reason why Secret Service agents have to keep in close proximity to the president at all times?

MR. EMANUEL: Tim, I think you and I have talked--I mean, both of us have family that are in the law enforcement community. I have an uncle who's a police officer in Chicago. And every morning those officers get up, they say goodbye to their family, and that could be the last time they see them. I think it would be inappropriate at this time to kind of look at the policy implications. I think there will be time for that, and plenty of people will have views about that and there should be a discussion about that. I think we're at a time now--I think the best thing we can do as a nation, as one family, is make sure that the families of those slain officers know that they have the prayers and the thoughts of the American people with them, regardless of what anybody's particular view of any policy

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sue related to this incident is.

MR. RUSSERT: In my conversation with Congressman Thomas, we talked about pressures to prevent this from happening again. One of the suggestions is a construction of a visitor's center on the east front of the Capitol, where people will be funneled into it, and enhanced security, a cost of \$135 million, a lot of discussion as to whether public funds should be used for the building of that visitor center. Would the Clinton administration look at funding such a visitor's center?

MR. EMANUEL: Well, we haven't discussed this yet at the White House. Obviously, this is something we're going to want to work with Congress. I wouldn't rule it out, obviously, at this point. That would be something proper. But I think in all those instances I don't want this to get ahead. That will be one of the things that will be looked at. I think what Mr. Lou Merletti has said in the past is something, obviously, people will think about and discuss. And we should have those discussions, particularly to this notion of a facility going into the House and Senate chambers that's outside. That's where the public flows. And if people think that's the correct thing to do for security purposes, obviously. We add our recommendation on Pennsylvania Avenue and immediately we acted on it for security purposes. So I think you have to take steps like that when people recommend, for security purposes.

MR. RUSSERT: You wouldn't have any objection to using public funding to build such a visitor's center?

MR. EMANUEL: You know, Tim, it's a fair question. I'm, obviously, not going to rule it out. I can't say yes or no at this point. You know, obviously, if security thinks it's important, it's something we're going to look for and look to.

MR. RUSSERT: And let me turn to the headlines of the day. Clinton Receives Order to Testify in Lewinsky Case. First Sitting President Subpoenaed to Appear at a U.S. Grand Jury. This president has made history.

MR. EMANUEL: So has Ken Starr, has made history. He's the first office of independent counsel that ever had two, as we know, ongoing investigations of its office. It has one with Michael Sheehan looking into it and it has another one by the D.C. Bar that we know about. They're looking into the conduct, both professional and ethical, of that office. And I'm--go ahead.

MR. RUSSERT: Will the president comply with the subpoena?

MR. EMANUEL: Well, first of all, don't know the nature of whether

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exists or not, but what we do know is that Mr. Kendall, the president's attorney, is working with the office of independent counsel to get them the information they need. And I also think it's important to know that, as you know, Tim, in the last four years, while this office has been going on and \$40 million has been spent, in fact, the president has found a way, with Mr. Kendall working with Mr. Starr, to get the information that the grand jury needs. Twice before he has testified.

MR. RUSSERT: So somewhere, somehow this president will testify under oath about the Monica Lewinsky situation?

MR. EMANUEL: David Kendall is instructed to work with Ken Starr to find a way to get the information that the grand jury needs. And we have done it in the past, and worked it out with the office of independent counsel over the last four years, as has Mrs. Clinton, I think, testified three times. So we have found a way to get the information the grand jury needs.

MR. RUSSERT: The president wants to testify under oath?

MR. EMANUEL: The president wants to get the information that the grand jury needs and has instructed Mr. Kendall to talk to Mr. Starr to do exactly that.

MR. RUSSERT: Let me talk about an issue of credibility. As you know, NBC News called you three times on Thursday and five times on Friday...

MR. EMANUEL: Right.

MR. RUSSERT: ...and asked specifically whether a subpoena had been issued based on information we had obtained. And eight times we were told, no. Did you mislead us or did the White House lawyers mislead you?

MR. EMANUEL: Tim, what I said is we don't comment. We don't issue subpoenas and we don't comment on them. I can't characterize whether we've ever got them or whether we've ever received them or what the content of them. I don't know to that fact.

MR. RUSSERT: But we specifically asked whether you received the subpoena, and you said, no.

MR. EMANUEL: Tim, no. What we did, I discussed with you and I said we don't comment on them. To my knowledge, I don't know if we've gotten it or not. I said exactly that to you.

MR. RUSSERT: Why then at 11:00 on a Friday night, after the

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pitol Hill shooting, did the White House kind of put out the word the subpoena had been received?

MR. EMANUEL: Now, Tim, I think what the White House said is what we've said with Jim Kennedy, what Michael McCurry said and what I have said here. We don't issue them, we don't comment on them.

MR. RUSSERT: So we can expect, in the very near future, the president to be under oath and answer questions from Ken Starr?

MR. EMANUEL: I think what you can expect is that Dave Kendall is now working with the office of independent counsel, Ken Starr, to find that information and to get--find out a way to get the information to the grand jury.

I'd like to make one other note, Tim. You know, August 5th will be four years of the anniversary of Ken Starr's appointment. Four years ago and about \$40-some odd million later, there has not been a single report by that office on the issue of Whitewater, on the issue of the travel office, on the issue of the files.

He is--the office of independent counsel under Ken Starr's leadership is incapable of writing a report that would clear the president or the first lady. And I want you to know August 5th, less than two weeks from now, is the anniversary of Ken Starr's appointment. I don't think any American ever thought four years ago that we would be at this situation or that office has stayed open and spent \$40 million, that we would not be able to come to a conclusion over a 24-year-old real estate deal, over whether, in fact, what happened with the travel office. And he is incapable of writing a report that would clear the president and the first lady.

And he has literally got one standing--what we do know it's one of the longest standing investigations, one of the most expensive investigations, one of the most intrusive investigations, including now has a unique distinction and hallmark that it's the only investigation that has two ongoing investigations into it.

MR. RUSSERT: Let me ask you about one other investigation. Charles Labella, who was appointed by Janet Reno to head up the Justice Department investigation into campaign contributions; Louis Freeh, the non-partisan director of the FBI--both of them have said unequivocally, there needs to be an independent counsel to look at campaign irregularities, both of Democrats and Republicans. Why won't the president support these two men?

MR. EMANUEL: The decision on the independent counsel is made on the law and the fact, and that's the way the attorney general's going to make her decision, and that's what she's going to

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. She's going to weigh everybody's opinion--she has said it publicly as recently as Thursday--that decision's based on the fact and the law.

MR. RUSSERT: But if the president wanted to pick up the phone and say, "Charles Labella, your hand-picked chief investigator, the director of the FBI, have found the grounds for an independent counsel. It is important that we clear up this mess, Madame Attorney General. Please, I'm imploring you, appoint an independent counsel"?

MR. EMANUEL: Well, I think, first of all, the attorney general makes this decision based on fact and law, Tim. She has shown before she's ready to make that call on the office of the independent counsel; surely, shown that many times before. And on this situation, she'll decide based on the fact and the law and not based on any public pressure from any quarter.

MR. RUSSERT: And joining me in questioning today is David Broder of The Washington Post. David.

MR. BRODER: Mr. Emanuel, the couple issues that actually affect people's lives, starting with the State of the Union address and, frequently, since then, the president has asked for legislation that would give patients in managed-care programs some rights.

MR. EMANUEL: Mm-hmm.

MR. BRODER: On Friday, the House passed a patients' bill of rights bill that guarantees payment for emergency-room services, ends the gag rule on doctors, gives women direct access to gynecologists, provides internal and external appeals process. Why is the president threatening to veto that bill?

MR. EMANUEL: Well, it's simple, David--is that the Gingrich bill falls far short of what the president seeks in the bipartisan Dingell-Ganske bill that represents Congressman Dingell, a Democrat, and Congressman Ganske, a Republican. It doesn't--it leaves millions of Americans out of coverage. It doesn't guarantee heart specialists and cancer specialists. It doesn't guarantee the continuity of care in case of--while you have a family doctor, that doctor's cut off from insurance, it doesn't guarantee that you get to continue with that doctor. It also doesn't end the bad practice of giving a bonus to doctors who deny care. And so it doesn't meet, I think, one of the most important principles guaranteed almost every American, a patients' bill of rights. Millions of Americans will be left out by that bill, and I don't think we should create second-class citizens when it comes to a patients' bill of rights. We should have coverage for everybody, not limited and discreet.

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Millions of Americans will be left out.

MR. BRODER: Accepting for the moment at least that it doesn't do everything that the administration would like, it does contain guarantees that are not now in the law. Many people think that the Democrats would rather have this as an issue for November than have a bill.

MR. EMANUEL: David, you've been here a long time in Washington. You've watched this for eight months. Let me just go over the history. Two years ago, the president's commission called for a patients' bill of rights. He announced it in his State of the Union. And in that eight months, he also signed an executive order guaranteeing 85 million Americans a patients' bill of rights who are under Medicare, Medicaid and federal health plans. And in those eight months, the leadership in the House and the Republican leadership called on the insurance industry to open up their wallets to help defeat this bill--any bill. And John Linder, the head of the Republican congressional campaign committee, recently said, "All we need is a vote on this to protect ourselves." Well, the goal here is not to protect the Republicans in the House; the goal here is to give a patients' bill of rights to Americans with health insurance.

MR. BRODER: We should note...

MR. EMANUEL: And this bill falls far short, and the Dingell-Ganske bill does accomplish the goals of every person getting a patients' bill of rights and should not limit that.

MR. BRODER: We should note just for the record that neither the president's commission nor the executive order contains provisions for an external lawsuit.

MR. EMANUEL: Right.

MR. BRODER: Let me ask about one other issue quickly.

MR. EMANUEL: Sure.

MR. BRODER: Tax cuts. Is there a tax cut that the president is willing to sign into law this year?

MR. EMANUEL: Well, two things. One is, you know that in his own budget, there is a tax cut for child care and there's a tax cut for retirement savings. What his principle is is that we must have Social Security first when it comes to the surplus and that we cannot have a tax cut that eats into the surplus that then postpones any Social Security reform, which is essential. And I think now we have a bipartisan agreement in the Senate. So he is for a tax cut. It's

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his budget. It's one that's paid for. It's child care and retirement as well as environmental tax cuts. On the issue of tax cut versus Social Security, the president's belief is, we should not dip into the surplus to pay for a tax cut. We need to basically preserve the surplus, in order, first, to fix Social Security. That's our first goal. Then we can look at that.

MR. BRODER: On Social Security, tomorrow, the president is in Albuquerque for another roundtable. Will he leave open the door to private savings accounts as part of the Social Security system, or is he going to close the door to that?

MR. EMANUEL: No, the whole commission and the whole one-year dialogue on Social Security is to, literally, A, focus on what the level of the problem is, what it needs to strengthen and preserve Social Security and see what other options are. He's not going to close off anything or limit anything or say, "This has to be part of it." That will be part of the dialogue.

I want to answer one other point and reaffirm something. When it comes to the debate about tax cuts and Social Security, this is in Congressional Daily, what a senior GOP aide said about the House Republicans. I think it's very telling. He said, and I read from "They need to realize," referring to the House Republicans, "that they are out of time, out of resources, out of credibility with the Senate. Because of their stupidity and ineptitude, there is no feasible way we can get a major tax cut through Congress before adjournment. The Senate aide said House leaders are embarked on an exercise that is futile. This is not some Mickey Rooney, let's put on a show, back-lot production." Ladies and gentlemen of the jury, I couldn't have said it better.

MR. RUSSERT: That has to be the last word. Rahm Emanuel, thanks very much for joining us.

MR. EMANUEL: Thank you.

MR. RUSSERT: Coming next, for the Republicans, Don Nickles of Oklahoma; for the Democrats, Bob Kerrey of Nebraska. Then, former White House counsel Jack Quinn and former federal prosecutor Barbara Olson square off on Ken Starr versus Bill Clinton.

(Announcements)

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Tab 52

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FOR THE DISTRICT OF COLUMBIA

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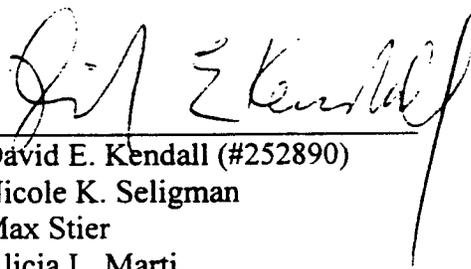
Misc. No. (NHJ)

(UNDER SEAL)

MOTION OF WILLIAM J. CLINTON FOR CONTINUANCE

William J. Clinton, through undersigned counsel, hereby moves this Court for a two-week continuance, to August 11, 1998, of the return date of a subpoena delivered to his counsel seeking the President's testimony today, July 28, 1998, before the grand jury. The reasons why this Motion should be granted are set forth in the accompanying memorandum.

Respectfully submitted,



David E. Kendall (#252890)
Nicole K. Seligman
Max Stier
Alicia L. Marti
WILLIAMS & CONNOLLY
725 12th Street, N.W.
Washington, DC 20005
(202) 434-5000

Counsel for Movant William J. Clinton

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

)	
)	Misc. No. (NHJ)
IN RE GRAND JURY PROCEEDINGS)	
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_____)	(UNDER SEAL)

ORDER

Upon consideration of the Motion of William J. Clinton for Continuance and any opposition thereto, the motion is GRANTED.

It is hereby ORDERED that the return date of the subject subpoena is continued to August 11, 1998.

SO ORDERED on this the _____ day of _____, 1998.

NORMA HOLLOWAY JOHNSON

considered, including issues that had arisen over the origin and conduct of the OIC's Lewinsky investigation. The OIC's most recent mention of the possibility of such testimony was almost four months ago, on April 3, 1998, with a response by Mr. Kendall on April 17, 1998. See Exhibit 1. The OIC did not respond to the April 17 letter and did not raise the issue with counsel for the President in any way in the almost four months since its last letter.

After this long period of silence, on Friday, July 17, 1998, without warning, the OIC delivered a subpoena to counsel for the President purporting to require President Clinton to testify before the grand jury today, July 28. Exhibit 2 (subpoena and accompanying letter). At the time, President Clinton was traveling outside of Washington, D.C., and he did not return until early Tuesday, July 21, 1998. In light of the need to consider properly the serious issues presented by the subpoena, counsel for President Clinton telephoned Mr. Bittman (of the OIC) on July 22, 1998, and requested that the OIC provide another week, until August 4, for counsel to respond to the July 17 delivery. On July 23, 1998, the OIC offered three more days, if the President would agree not to seek any additional time from the OIC or the Court. Exhibit 3 (July 23, 1998 Letter of Mr. Bittman).

On July 24, 1998, counsel for President Clinton informed the OIC that the President "is willing to provide testimony for the grand jury, although there are a number of questions relating to the precise terms and timing of the testimony which must be worked out." Exhibit 4 (July 24, 1998 Letter of Mr. Kendall). Counsel for the President also requested that the subpoena be withdrawn while these issues were resolved. The OIC declined to withdraw the subpoena. Exhibit 5 (July 24, 1998 Letter of Mr. Bittman). Subsequently, by letter yesterday, Mr. Kendall wrote to the OIC with a detailed and specific proposal regarding both the format and timing of potential testimony by the President. Exhibit 6 (July 27, 1998 Letter of Mr. Kendall).

Despite this responsive and good faith offer, and the prospect of immediate continuing negotiations, the OIC refused to withdraw or even continue the return date of the subpoena beyond 1:30 p.m. today unless "the President commits in writing to testify on a date certain on or before August 7, 1998." See Exhibit 7 (July 27, 1998 Letter of Mr. Bittman).

II. Argument

The OIC's denial of a brief continuance here is wholly unreasonable. There is a very real possibility that the President and the OIC will be able to agree on timing and procedures whereby the President may provide information to the grand jury. The subpoena plainly raises fundamental separation of powers concerns, see Exhibit 8 ("Starr Subpoena Poses Constitutional Conflict," Chicago Tribune, July 27, 1998); (Interview of Professor Paul Rothstein, ABC News, July 26, 1998), which have not previously been presented to a court and adjudicated. The Supreme Court observed in the Paula Jones case that "although Presidents have responded to written interrogatories, given depositions, and provided videotaped trial testimony . . . no sitting President has ever testified, or been asked to testify in open court." Clinton v. Jones, ___ U.S. ___, 117 S.Ct. 1636, 1643 n.14 (1997). There may, however, be no need to resolve the novel question whether a President may be compelled to testify before a grand jury. But more time is needed to explore whether a resolution short of litigation is possible.

The OIC's assertion that it needs the President's testimony on or before August 7, 1998, is patently unfounded. The Whitewater investigation has dragged on for more than four years. The OIC last raised the question of the President testifying in early April, and it then did not respond in any way to counsel's April 17 letter on this subject. As the OIC well knows, in the past when the President's testimony has been sought, it has taken weeks to schedule an appropriate date, because of the President's many commitments and because of the length of time his schedule is set in advance. In the present case, counsel have presented the OIC with a

“date certain” for his testimony which is consistent with the President’s schedule and other obligations. The OIC has stated that an earlier date is necessary. Because the President has not immediately agreed, the OIC has refused to continue today’s return date at all. This obstinate refusal demonstrates a desire to precipitate a possibly needless battle, rather than a statesmanlike effort to avoid one.

The OIC’s position is particularly arbitrary here because there are no impending deadlines, no statutes of limitations are about to run, and no trials are imminent. There is simply no justification for the OIC’s deadline except its own fiat. This captious and cavalier treatment is particularly inconsistent with the OIC’s often professed “profound respect for the institution of the Presidency.”¹ While the OIC has stated that it “fully acknowledge[d] that the President has immense and weighty responsibilities” and that it “want[ed] in every way to take fully into account those grave duties of state,”² its actions here belie these sentiments and also show how hollow is the OIC’s recent representation that if the President will agree to testify “we and the grand jury -- as we have previously stated -- will accommodate [the President’s] schedule if he cannot appear on the 28th [of July].”³

For whatever reasons, the OIC insists that the President agree in writing by 1:30 p.m. today to testify on or before August 7. As explained in detail in a letter from counsel to the President provided yesterday to the OIC, see Exhibit 6, that date is wholly unacceptable, given the President’s schedule and the need for the President to prepare properly for his testimony.

¹ Exhibit 1 (Letter of Robert J. Bittman, Esq., to David E. Kendall, Esq., dated March 13, 1998).

² Exhibit 1 (Letter of Robert J. Bittman, Esq., to David E. Kendall, Esq., dated March 2, 1998).

³ Exhibit 2 (Letter of Robert J. Bittman, Esq., to David E. Kendall, Esq., dated July 17, 1998).

When the Supreme Court indicated last year that a civil case could proceed against a sitting President, it nevertheless insisted that the “high respect that is owed to the Office of the Chief Executive . . . should inform the conduct of the entire proceeding,” and it stressed the importance of avoiding “interference with the President’s duties.” Jones v. Clinton, ___ U.S. ___, 117 S.Ct. 1636, 1650-51 (1997). The Court of Appeals for this Circuit only yesterday, in a case arising from the OIC’s investigation, emphasized the “deference due to the President” as he seeks to meet both public and private legal obligations and ruled that a court “must accommodate the unavoidable, virtually full-time demands of the office.” In re: Bruce R. Lindsey (Grand Jury Testimony), No 98-3060 (D.C. Cir. July 27, 1998) (slip op. at 36, 38).⁴

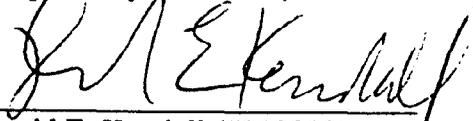
Given the constitutional significance of the issues presented by the subpoena, the lack of any colorable reason to deny a short continuance, the possibility that an agreement might be reached which would accommodate the concerns of both the OIC and the President, and the long delay which will certainly follow if a legal confrontation is forced, we respectfully submit that the OIC’s refusal to continue the subpoena is irresponsible, unreasonable, and oppressive. When the Supreme Court decided the Jones case, it did so on the basis of an explicitly stated assumption that any testimony from the President “may be taken . . . at a time that will accommodate his busy schedule,” Clinton v. Jones, *supra*, 117 S.Ct. at 1643. It is just such an accommodation that movant seeks and that the OIC arbitrarily resists.

⁴ The Court of Appeals noted that “there is a tradition of federal courts’ affording ‘the utmost deference to Presidential responsibilities.’” Id. at 39.

CONCLUSION

For the foregoing reasons, President Clinton's motion for a two-week continuance should be granted.

Respectfully submitted,



David E. Kendall (#252890)

Nicole K. Seligman

Max Stier

Alicia L. Marti

WILLIAMS & CONNOLLY

725 12th Street, N.W.

Washington, DC 20005

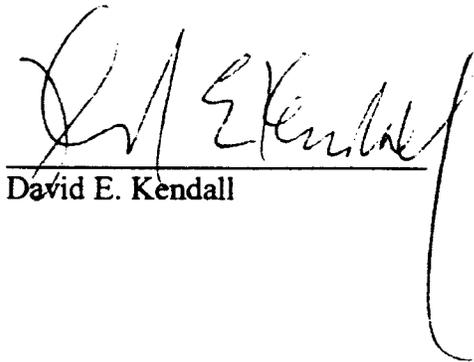
(202) 434-5000

Counsel for Movant William J. Clinton

CERTIFICATE OF SERVICE

I certify that I have this 28th day of July 1998 caused one copy of the foregoing Motion of William J. Clinton for Continuance, memorandum in support thereof, and proposed Order to be hand delivered to:

Robert J. Bittman, Esquire
Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004



David E. Kendall

Tab 1

**Office of the Independent Counsel**

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

February 2, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

As you know, President Clinton has publicly pledged to cooperate fully with the investigation involving Monica Lewinsky. Last Wednesday, January 28, I invited President Clinton, on behalf of the grand jury, to testify before the grand jury this Thursday, February 5, concerning matters relating to Ms. Lewinsky. You indicated in our conversation that you would get back to me as to whether the President will so testify. The grand jury awaits the President's decision; please advise me as soon as possible what the President decides.

Sincerely,

A handwritten signature in black ink that reads "Robert J. Bittman".

Robert J. Bittman
Deputy Independent Counsel

**Office of the Independent Counsel**

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

February 4, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

Although the President has declined the invitation to testify before the grand jury tomorrow, the grand jury's investigation continues apace. On behalf of the grand jury and in an effort to accommodate the President's schedule, we respectfully invite the President to testify before the grand jury next Tuesday, Wednesday, or Thursday, February 10 to 12.

The grand jury would like to complete this investigation, as the President stated, "sooner rather than later. . . . [and] as quickly as we can." Kindly advise me by noon this Friday as to whether the President accepts the invitation to testify.

Sincerely,

A handwritten signature in cursive script that reads "Robert J. Bittman".

Robert J. Bittman
Deputy Independent Counsel

**Office of the Independent Counsel**

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

February 9, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

Last Wednesday, we, on behalf of the grand jury, extended a second invitation to the President to testify before the grand jury about his relationship with Monica Lewinsky. You did not respond to the invitation by last Friday, as requested in my letter. The grand jury's work continues. Notwithstanding your failure to respond, the grand jury would be pleased to accommodate the President's testimony any day or time this week.

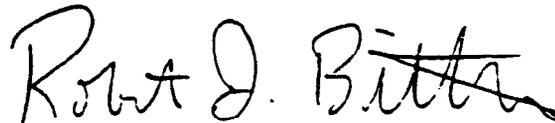
Let me make our request specific and clear: the grand jury deserves to know whether the President will respond, favorably, to the invitation. Such an invitation is, of course, fully consistent with our profound respect for the Presidency in our system of separated powers. To that end, we have consulted with the Chief Judge, and she has assured us that the grand jury can accommodate the President's scheduling needs should the President choose to tell his story to the grand jury.

For planning purposes, kindly let me know if the President wishes to testify before the grand jury this week. If the President cannot appear this week, please let me know by Friday, February 13, whether the President wishes to testify

David E. Kendall, Esq.
February 9, 1998
Page two

before the grand jury, and if so, when. If I do not hear from you by that date, we will assume that the President will not voluntarily provide testimony before the grand jury. In that event, we will inform the grand jury of this turn of events.

Sincerely,

A handwritten signature in cursive script that reads "Robert J. Bittman". The signature is written in dark ink and is positioned above the typed name.

Robert J. Bittman
Deputy Independent Counsel

2295

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February 13, 1998

CONFIDENTIAL

RULE 6(e), F. R. CRIM. P. GRAND JURY SUBMISSION

By Hand

Robert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

Dear Bob:

This will respond to your letters dated February 4 and 9, 1998. I was unable to respond to your February 4 invitation by the Friday deadline you had indicated in your letter because I was in the process of dealing with prejudicial and false leaks of information about your investigation. I set forth my position on that matter in brief public remarks Friday afternoon and in a 15 page letter to Judge Starr which I hand-delivered to your office that same afternoon. These leaks are highly unfair and prejudicial to the President and others, and, as you may know, on Monday I filed a sealed motion with the Chief Judge seeking judicial remedies in an effort to enforce the secrecy and confidentiality of the investigative process.

I acknowledge your invitation for the President to appear before the grand jury next week. The President has the greatest respect for the grand jury. However, under the circumstances, it is impossible to accept this invitation. The situation in Iraq continues to be dangerously volatile, and this has demanded much of the President's time and attention. The President also has a heavy travel schedule at present. Our access to him has necessarily been limited. Moreover, as I informed you during our February 3 telephone conversation concerning this matter, we have simply had inadequate opportunity to prepare so that we may give our client the informed advice of counsel which he, like every other citizen, deserves. Your recent letter references your

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
February 13, 1998
Page 2

office's "profound respect for the Presidency in our system of separated powers." However, I am certain that you understand why, in light of the well-publicized and questionable investigative techniques of your office, we feel we would be derelict in our professional duty to a client unless we assured ourselves that we had adequate opportunity to advise that client appropriately.

In the event you decide to "inform the grand jury of this turn of events", as stated in your letter, I would respectfully request that you also read my letter to the grand jury and make my letter part of the grand jury record.

I thank you for your courtesy.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Kendall", written over the typed name below.

David E. Kendall



Office of the Independent Counsel

1001 Pennsylvania Avenue, N.W.
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Fax (202) 514-8802

February 21, 1998

VIA FACSIMILE

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

We regret the President's decision not to appear before the grand jury at this time. In light of the President's past and continuing pledges to cooperate with this investigation, we again invite the President to testify before the grand jury about his relationship with Monica Lewinsky. We make this invitation fully sensitive to the important duties and responsibilities of the President. Moreover, as stated in my last letter, I have discussed this matter with Chief Judge Johnson, and she has indicated that the grand jury will accommodate any special scheduling needs of the President. We are ready to hear the President's testimony. Kindly let me know by Friday, February 27, whether the President will agree to testify before the grand jury at any time.

Sincerely,

A handwritten signature in black ink that reads "Robert J. Bittman".

Robert J. Bittman
Deputy Independent Counsel

**Office of the Independent Counsel**

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March 2, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

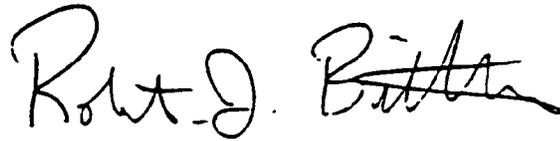
Based on your previous declinations and your failure to respond within the time outlined in my letter of February 21, 1998, we assume that the President has declined our invitation to testify before the grand jury. With this letter, we again invite the President to provide the grand jury with information concerning its ongoing investigation.

In regard to the various explanations you have been kind enough to advance for declining our four invitations, I note that (1) the state visit of Prime Minister Blair has passed; (2) the "situation in Iraq" has, thankfully, eased; and (3) you have now had some six weeks to "prepare" the President. See letters to Robert J. Bittman from David E. Kendall dated February 4 and February 13. We fully acknowledge that the President has immense and weighty responsibilities. We want in every way to take fully into account those grave duties of state. Yet since this matter arose, the President has -- with all respect -- found time to play golf, attend basketball games and political fundraisers, and enjoy a ski vacation. We assure you that the grand jury's inquiry of the President will not take long, and we and the grand jury remain -- as we have always been -- eager to accommodate the President's schedule.

David E. Kendall, Esq.
March 2, 1998
Page two

Kindly advise me by noon Wednesday, March 4, 1998, whether the President will accept this invitation. If I do not hear from you by that time, I will assume the President declines the invitation. I look forward to your early -- and, I hope favorable -- reply.

Sincerely,

A handwritten signature in cursive script that reads "Robert J. Bittman". The signature is written in dark ink and is positioned above the typed name.

Robert J. Bittman
Deputy Independent Counsel

2300

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March 4, 1998

CONFIDENTIAL
RULE 6(e), F.R.CRIM.P. GRAND JURY SUBMISSION

Robert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

By Hand

Dear Bob:

This will respond to your letters dated February 21 and March 2, 1998. I apologize for my delay in responding. The fault is mine: as you know, we filed a lengthy reply on Friday in the sealed "leaks" matter, responding to your opposition to our original motion for contempt sanctions. That matter simply absorbed my time, but I am now able to give your correspondence the attention it deserves.

As I hope you are aware, the President has the greatest respect for the grand jury. I appreciate your own acknowledgement in your March 2 letter of the "grave duties of state" which are uniquely the President's and the "immense and weighty responsibilities" he must discharge. The buck really does stop with the President for decision-making on a vast range of issues that are critical to this country's safety and economic security.

While it is true that not every moment of the day is absorbed by the duties of office, the President is extraordinarily busy on a range of important public issues, some of which are visible and some of which are not. In our judgment, our ability to have access to the President is simply insufficient at the present time for purposes of representing him adequately in the matters with which you are concerned.

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
March 4, 1998
Page 2

Accordingly, he will, on our advice, not be able to accept your invitation for him to testify at this time. I am certain you would agree that the President deserves the same right to the informed assistance of private counsel as does every other citizen.

Your most recent letter remarks that the situation in Iraq has "thankfully, eased." While there are some respects in which this may be true, the situation remains highly volatile, as a glance at today's newspapers will reveal. The continuing Southeast Asian economic crisis and the Bosnian situation also demand a great deal of the President's time, as do other national security issues, many of which are highly confidential.

On the domestic front, the President's schedule is equally congested. The Administration's proposed budget was submitted to Congress last month, and the President is in the midst of major negotiations with the Republican majorities over key budgetary objectives, such as reserving the bulk of the budgetary surplus for Social Security. Other Administration initiatives are at critical stages. The President is attempting to hammer out national legislation around a tobacco liability settlement. More "town hall" meetings are scheduled concerning the President's race initiative, which will focus on the need for strengthening the Equal Employment Opportunities Commission and the Civil Rights Division of the Justice Department. There is also currently in the White House a sustained focus on major health care proposals (expanding Medicare coverage to persons age 55-64 who have lost their health coverage due to no fault of their own; securing passage of an HMO patient "bill of rights"), on new education legislation (enacting strong national educational standards; trying to improve math and science achievement), and on highway legislation/auto safety bills (federal standards for a lower blood alcohol definition in DUI cases).

The President also has an extremely heavy foreign and domestic travel schedule. He will be out of the country for nearly three weeks this month and next in Africa and South America. These are major State visits to key strategic parts of the world, and a considerable amount of pre-departure preparation, review, and study is required, which will absorb a significant amount of the President's time in this country.

Moreover, as I indicated in my earlier letter, we remain concerned about some of the well-publicized and questionable investigative techniques used by your office. Events of recent days have done nothing to alleviate this concern, and this necessarily affects our judgment as to the

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
March 4, 1998
Page 3

degree of preparation necessary to assure the President has adequate and informed legal assistance at the present time. As you are no doubt aware, you have subpoenaed the investigator retained by this firm and by the law firm defending the President in the Paula Jones suit, and the focus of your questioning was on criticism directed at your office. This investigator was retained for lawful, legitimate, and well-recognized purposes, and your subpoena is, in our view, a blatant and unwarranted attempt to intrude into and violate the legal privileges enjoyed by every citizen, including the President, in litigation where that citizen is personally being sued or investigated. No more reassuring is your recent interrogation of Mr. Sidney Blumenthal, who works at the White House, to inquire into criticisms of your office in the press. Finally, I have received no response to my letter (a copy of which is attached hereto) sent to the Independent Counsel more than two weeks ago, inquiring as to contacts his law firm (Kirkland & Ellis) had with the lawyers for Ms. Paula Jones and legal assistance it had rendered to her. Some news reports raise troubling issues of possible conflict of interest, and I would like to get these resolved just as soon as possible.

You do, of course, have a copy of the President's deposition given on January 17, 1998, in the Jones case, and his sworn testimony there addresses at length the Monica Lewinsky matter. You have also, as I understand, requested multiple copies of the videotape of this deposition. I believe, therefore, that the grand jury in fact already has access to sworn testimony given by the President about this topic. The questions asked the President by Ms. Jones' counsel were, in fact, surprisingly detailed and particularized. As you may know, there have been news reports suggesting that Ms. Linda Tripp spent most of the Friday before the President's deposition with lawyers and agents from your office, after the apprehension of Ms. Lewinsky at a meeting with Ms. Tripp. At the end of her day with your personnel, again according to press reports, Ms. Tripp, with the apparent acquiescence of your office, met in Maryland with lawyers for Ms. Jones. There, she reportedly told them of the tapes she had secretly made of her conversations with Ms. Lewinsky, shared with them the contents of these secret tapes, and helped them devise questions to ask the President at his deposition next day, the transcript of which you have. We believe that, at least by this time, Ms. Tripp was well aware that such tapings were illegal and a felony under Maryland law. We are in the process of investigating all the legal implications of these apparent facts.

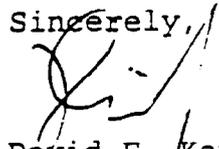
WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
March 4, 1998
Page 4

Again, I would respectfully ask you to read this letter, with its attachment, to the grand jury and to make them part of the grand jury record, if your letters to me are shared with the grand jury.

I thank you for your courtesy.

Sincerely,



David E. Kendall

2304

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EDWARD BENNETT WILLIAMS (1920-1988)
PAUL A. CONNOLLY (1922-1978)

February 17, 1998

The Honorable Kenneth W. Starr
Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

BY HAND

Dear Judge Starr:

I write with an inquiry in the wake of a Chicago Tribune article which appeared on February 11 (copy enclosed), and I am making this request in an effort to obtain accurate information so that I may decide how to proceed. The article reports that one of your partners in Kirkland & Ellis, Mr. Richard Porter, may have provided legal advice and services to plaintiff Paula Corbin Jones in her civil suit against President Clinton. The article also reports that someone at the law firm FAXed a copy of a draft affidavit in the Jones case to the Tribune prior to the affidavit's filing in court, an action which would, if true, suggest that the firm has indeed been involved in the legal prosecution of the Jones case. Finally, the article reports that one of the Jones lawyers, Joseph Cammarata, received advice from Mr. Porter on several occasions about legal issues in the Jones case. This recent report is particularly surprising in view of previous news articles in which your partners at Kirkland & Ellis were quoted as saying that the firm would not become involved in the Jones case ("We don't feel it's appropriate for the firm to be involved in any civil litigation directly involving the president," [Kirkland & Ellis partner] Jay Lefkowitz [said]. " The Washington Post, Aug. 12, 1994). (Copy enclosed).

Additionally, there have been reports of your own participation in legal discussions with Ms. Jones' lawyers, prior to the time you were appointed Independent Counsel.

WILLIAMS & CONNOLLY

Honorable Kenneth W. Starr
 February 17, 1998
 Page 2

I emphasize that I am not now addressing the fact that you planned to file an amicus brief for the Independent Women's Forum after the Jones complaint was filed, something that has been previously reported. See, e.g., "Friend of Court Is Foe of Clinton," Washington Times, June 8, 1994, at 1A.

Instead, my present inquiry focuses on recent reports that you gave legal advice to Ms. Jones' lawyers pertaining to her own lawsuit against the President. For example, the Associated Press reported on January 28, 1998, that you gave legal advice to Ms. Jones' lawyers "on 'the legal question of whether the president is accountable in a private lawsuit,' according to Gilbert K. Davis, who no longer represents Mrs. Jones." (Copy enclosed.) On January 30, 1998, the Associated Press reported that Ms. Jones' lawyers "acknowledge consulting with Starr after filing the lawsuit, but said that was only to seek advice from the constitutional scholar on how to address Clinton's claim that he was temporarily immune from lawsuits The lawyers said they contacted Starr . . . before he was named Whitewater prosecutor." (Copy enclosed.) That same day, The Washington Post reported that "Jones's former lawyers now . . . say that Starr even consulted with them in two or three telephone calls that dealt with the legal arguments to be made against Clinton's immunity claim." (Copy enclosed.)

You apparently believed that, even before the recent expansion of your jurisdiction, you were somehow entitled to investigate the Paula Corbin Jones matter. It was reported last summer, before the January 16, 1998, expansion of your jurisdiction, that your investigation was focusing in some way on Ms. Paula Corbin Jones. For example, The Washington Post reported the following on June 25, 1997:

"The [Arkansas state] troopers said investigators asked about 12 to 15 women by name, including Paula Corbin Jones, a former Arkansas state employee who has filed a civil lawsuit against Clinton alleging he sexually harassed her in 1991.

.....

In addition, [Roger Perry] said, 'They [your investigators] asked me about Paula Jones, all kinds of questions about Paula Jones, whether I saw Clinton and Paula together and how many times.'

(Copy enclosed.)

WILLIAMS & CONNOLLY

Honorable Kenneth W. Starr
 February 17, 1998
 Page 3

I would be grateful if you could inform me whether any of these many news reports are accurate, and I would also request that, if any of the above reports are accurate, you inform me whether such information was presented to the Attorney General or the Special Division prior to the Court's January 16, 1998, expansion of your jurisdiction. As I know you will recall, the Special Division has been quite sensitive to the appearance of conflict. In its August 5, 1994, Order appointing you, that Court stated that it had determined that a continuation of Mr. Fiske's appointment "would not be consistent with the purposes of the Act:"

"This reflects no conclusion on the part of the Court that Fiske lacks either the actual independence or any other attribute necessary to the conclusion of the investigation. Rather, the Court reaches this conclusion because the Act contemplated an apparent as well as an actual independence on the part of the Counsel. As the Senate Report accompanying the 1982 enactments reflected, '[t]he intent of the special prosecutor provisions is not to impugn the integrity of the Attorney General or the Department of Justice. Throughout our system of justice, safeguards exist against actual or perceived conflicts of interest without reflecting adversely on the parties who are subject to conflicts.' S. Rep. No. 436, 97th Cong., 2d Sess. at 6 (1982) (emphasis added). Just so here. It is not our intent to impugn the integrity of the Attorney General's appointee, but rather to reflect the intent of the Act that the actor be protected against perceptions of conflict."

(Second emphasis added.)

In addition, the Independent Counsel Statute imposes certain restrictions on both the person appointed as IC and that person's law firm. For example, 28 U.S.C. § 594(j)(1)(A) provides that "[d]uring the period in which an independent counsel is serving under this chapter (i) such independent counsel, and (ii) any person associated with a firm with which such independent counsel is associated, may not represent in any matter any person involved in any investigation or prosecution under this chapter." Moreover, under elementary principles of partnership law in Illinois, Arkansas, and the District of Columbia, a legal representation of a client by one partner is attributable to all other partners.

Application of these legal standards to the facts set forth in the recent news articles quoted above raises serious and troubling questions about the propriety of your serving as

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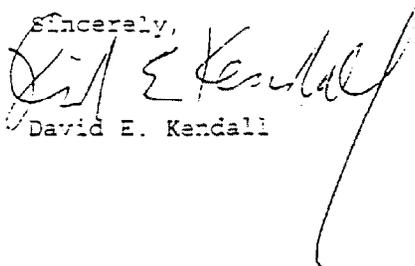
Honorable Kenneth W. Starr
February 17, 1998
Page 4

Independent Counsel to investigate matters pertaining to the Jones case. You have in the past investigated the Jones matter, according to The Washington Post. The recent expansion of your jurisdiction explicitly requires you to investigate events "concerning the civil case Jones v. Clinton." You have, since your appointment as Independent Counsel, remained an active partner in the Kirkland & Ellis law firm, as was your right. The partnership includes Mr. Porter.

I hope you can therefore perceive why I am requesting accurate and specific information (i) concerning your own, Mr. Porter's, and any other Kirkland & Ellis lawyer's, employee's or agent's contacts with and assistance to Ms. Paula Corbin Jones and/or her attorneys or agents or supporting groups, and (ii) concerning what was conveyed to the Attorney General and the Special Division in January, 1998, about any such contacts and assistance, when you sought an expansion of your jurisdiction to encompass the Jones v. Clinton case.

I thank you for your courtesy.

Sincerely,

A handwritten signature in dark ink, appearing to read "David E. Kendall". The signature is written in a cursive style with a long, sweeping tail that extends downwards and to the right.

David E. Kendall



Office of the Independent Counsel

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Washington, DC 20004
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Fax (202) 514-8802

March 13, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

By your letter last Wednesday, March 4, 1998, the President has now declined five invitations to testify and tell his story to the grand jury.

As time goes on, now eight weeks into the investigation, your claim that the President continues not to have time to prepare his testimony about Ms. Lewinsky is increasingly difficult for us to understand. We mean no disrespect whatever, mindful as we are of the President's constitutional obligations, but as stated in my letter of March 2, 1998, since the Monica Lewinsky matter began the President has found time to play golf, attend basketball games and political fundraisers, and enjoy a ski vacation. On January 17, 1998, the President was deposed for nearly a full day in the Jones v. Clinton lawsuit. Your co-counsel, Bob Bennett, has even moved to expedite the trial date in that case. In addition, as you remember, despite the President's weighty responsibilities we had no trouble scheduling the President's depositions for other Whitewater-related matters, and we were able to schedule his testimony in the two trials in Little Rock with relative ease. In those trials, of course, he was summoned as a defense witness, not by the United States.

You may recall that when the grand jury issued a subpoena for Mrs. Clinton's testimony in January 1996, you and White House Counsel complained that she, at minimum, should have first been given the opportunity to appear voluntarily. You and White House Counsel urged alternatives in lieu of a grand jury

David E. Kendall, Esq.
March 13, 1998
Page 2

appearance. As to the President and the Lewinsky matter, however, you have declined five invitations to testify voluntarily. Moreover, you have suggested no alternatives.

Until last week, the President had repeatedly pledged his full cooperation in connection with the Monica Lewinsky investigation. Last Thursday, March 5, 1998 -- one day after the President declined our fifth invitation to appear voluntarily before the grand jury -- the President publicly declared he had "given all the answers that matter" relating to Ms. Lewinsky. The President has also invoked executive privilege under circumstances exceedingly difficult to justify under settled principles of our constitutional system. We are, in consequence, constrained to say this: We now question whether the President ever intends to cooperate with this investigation, as promised, and testify.

The suggestion in your letter that our possession of the President's deposition in the Jones v. Clinton case provides the grand jury "access" to the President's information about the Lewinsky matters is, with all respect, disingenuous. The President was questioned in his deposition about a single, narrow issue involving Ms. Lewinsky. As you know, the Special Division -- upon the specific request of the Attorney General -- defined our jurisdiction to include "whether Monica Lewinsky or others suborned perjury, obstructed justice, intimidated witnesses, or otherwise violated federal law . . . in dealing with witnesses, potential witnesses, attorneys, or others concerning the civil case Jones v. Clinton." Our inquiry is by law much broader than the narrow issue about which the President was questioned in his deposition.

Let me reiterate: we have profound respect for the institution of the Presidency. Yet, as I am sure you agree, the grand jury is entitled to "every man's evidence." See United States v. Nixon, 418 U.S. 683 (1974); United States v. Burr, 25 Fed.Cas. 20 (No. 14,692) (C.C. Va. 1807). It is urgent that we receive the President's testimony in this matter as soon as possible.

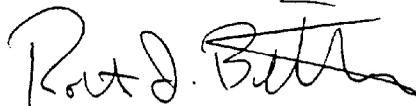
Kindly advise me by noon Tuesday, March 17, 1998, whether the President will testify in any manner about the matters involving Ms. Lewinsky. If, as I indicated briefly above, alternatives to a grand jury appearance have occurred to you, then we are prepared to discuss them at your earliest

David E. Kendall, Esq.
March 13, 1998
Page 3

convenience. In particular, a deposition format -- should the President refuse his right to present his testimony to the grand jury and face his fellow citizens eye to eye -- is an arrangement we stand ready to discuss. We are ready and able to accommodate any issues of Presidential dignity, as well as security, which of course can be readily accomplished at the United States Courthouse.

Nothing, in short, should stand in the way of the truth's coming out. As should be apparent, we continue to seek -- on behalf of the grand jury -- the President's truthful testimony before that body, which stands ready to sustain any inconvenience in order to respect the President's schedule, while at the same time carrying out its solemn function under our system of law.

Sincerely,

A handwritten signature in dark ink, appearing to read "Robert J. Bittman". The signature is fluid and cursive, with a horizontal line above the name.

Robert J. Bittman
Deputy Independent Counsel

2311

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March 18, 1998

CONFIDENTIAL

RULE 6(e), F.R.CRIM.P., GRAND JURY SUBMISSION

Robert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

Bv Hand

Dear Bob:

Thank you for your letter dated March 13, 1998. I will be equally frank in response.

For over four years now, the President has cooperated in every possible way with the investigation of the Independent Counsel. He has voluntarily given testimony under oath on three separate occasions to the Independent Counsel and twice to defendants (on each occasion, he was cross-examined by the Independent Counsel), he has submitted written interrogatory answers, he has produced more than 90,000 pages of documents, and he has provided information informally in a variety of ways.

I, too, have dealt in good faith with your investigation for more than four years. Until the recent expansion of jurisdiction to cover the Lewinsky matter, I have not had occasion to raise, nor have I raised, the kind of concerns I have adverted to in recent correspondence. I will be more specific: the actions of the Office of Independent Counsel in the past several weeks (as distinct from the actions of the grand jury) lead me to believe that your investigation may not, in fact, be an even-handed search for justice but rather may be, for whatever reason, a campaign to embarrass and harass the President. I believe he is now plainly the object of your investigation.

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
 March 18, 1998
 Page 2

You state that it is "disingenuous" to assert that the President's deposition transcript (including the videotape of the deposition, which you likely will soon have access to) in Jones v. Clinton allows you to obtain the President's information on the Lewinsky matter. We continue to believe that the forty deposition pages of testimony (pp. 48-86, 202-204) on this topic set forth the essentials of this matter, although there are doubtless more questions you might be able to devise.

Of more serious concern to us is evidence that your office contrived to obtain the President's deposition testimony through improper and illegal means. Based upon what we have been able to learn thus far (see, e.g., the page one Washington Post article on February 14, 1998, headlined "Linda Tripp Briefed Jones Team on Tapes"), your office, your agent Linda Tripp, and the Paula Jones lawyers apparently colluded to use the fruits of Tripp's felonious audiotaping (see Md. Code Ann. § 10-402 (1997)) of Lewinsky against the President at his deposition on Saturday, January 17, 1998. Curiously, Tripp appears to have been given immunity by your office immediately after she contacted you. She then secretly recorded at least one conversation with Lewinsky, an act that (unlike her previous audiotapings) does not appear to have been in violation of wiretap law. According to the Washington Post's February 14 article, Tripp arranged to have Lewinsky apprehended by your agents about noon on Friday, January 16, then put off a meeting with the Jones lawyers until (we believe) it became clear that Ms. Lewinsky would not herself agree to wear a recording device to gather evidence against others. At some point late in the afternoon, Tripp "sent word" to the Jones lawyers that she would talk to them, and she was transported to her home in Maryland (perhaps by one of your agents) where she proceeded to share both the existence of the illegal tapes^{1/} and their contents with the Jones lawyers, who were able to use this information the next day to question the President.^{2/}

^{1/} Under the Maryland electronic surveillance statute which makes one-party telephone call taping a felony, it is a violation of the statute to disclose that an illegal tape has been made, since the term "contents" (the disclosure of which are forbidden) is defined to include "any information concerning the identity of the parties to the communication or the existence, substance, purport, or meaning of that communication." Md. Code Ann. § 10-401(7) (1997) (emphasis added).

^{2/} Indeed, the Washington Times observed that "With the information from Mrs. Tripp, the Jones lawyers were able to ask Mr. Clinton in his deposition specific questions about

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
March 18, 1998
Page 3

The Ethics in Government Act provides in Sec. 593(c)(1) a carefully defined procedure for expanding the jurisdiction of an independent counsel. If a new matter is not "related" to an existing subject of investigation (and the Lewinsky matter plainly was not), the statute does not allow a free-roving investigation beyond the limits of an independent counsel's present jurisdiction. For example, there would be no statutory justification to "wire" a cooperating witness to investigate further a matter not within the jurisdiction of the independent counsel. Section 593(c)(2)(A) of the Act provides that "[i]f the independent counsel discovers or receives information about possible violations of criminal law by [covered persons] which are not covered by the prosecutorial jurisdiction of the independent counsel, the independent counsel may submit such information to the Attorney General," and the Attorney General "shall then conduct a preliminary investigation of the information in accordance with the provisions of section 592" (emphasis added). While the Attorney General "shall give great weight to any recommendations of the independent counsel" (ibid.), the determination whether to recommend to the Special Division an expansion of jurisdiction is the Attorney General's alone.

Under the circumstances here, there was no need for a hasty and informal presentation to the Attorney General--unless the OIG was hoping to use Tripp (and perhaps Lewinsky) to somehow obtain incriminating evidence against the President whose deposition in the civil case was fast approaching. We believe that the Attorney General was not properly informed about the circumstances which ostensibly justified the expansion of jurisdiction sought, and that your recent investigation has in fact been a contrivance to justify post facto the grant of jurisdiction that your office obtained from the Special Division.

It appears to us that you did not seek, the Attorney General did not approve, and the Special Division did not authorize the

his relationship with and gifts to Miss Lewinsky, according to a person informed about the President's testimony." (The Washington Times, Feb. 15, 1998.) At the deposition, when the President remarked after a series of highly specific questions concerning Ms. Lewinsky, "I don't even know what you're talking about, I don't think," Ms. Jones' lawyer, James Fisher, replied, "Sir, I think this will come to light shortly, and you'll understand." Deposition transcript, at 85.

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
March 18, 1998
Page 4

extension of your jurisdiction based on any specific and credible evidence of criminal activity by a covered person. As you surely know, the expansion of jurisdiction approved by the Special Division, on the basis of an oral application, was to investigate "whether Monica Lewinsky or others suborned perjury, obstructed justice, intimidated witnesses, or otherwise violated federal law . . . in dealing with witnesses, potential witnesses, attorneys, or others concerning the civil case of Jones v. Clinton." No "covered person" was involved in this matter unless and until the President gave testimony which might be regarded by your office as suspect. The Attorney General's written application to the Special Division, submitted after the Court was informed orally of the request, states that the Attorney General had determined that it would be a conflict of interest, under 28 U.S.C. § 591(c)(1) for the Department of Justice to investigate. However, it was still incumbent upon the Attorney General to conduct an appropriate "preliminary investigation" to determine that there was specific evidence from a credible source to warrant further investigation. We do not believe the Attorney General was provided adequate information about Tripp's illegal audiotaping or her general credibility or about the efforts by your office to acquire evidence which could be used to support the expansion of jurisdiction. We do not believe that such a bootstrap acquisition of jurisdiction as apparently occurred here was ever contemplated by the Ethics in Government Act.

We have another serious concern about the expansion of jurisdiction in this matter, and I have adverted to this in my letter to you dated March 4, 1998. As you know, I attached a copy of a letter to the Independent Counsel which I had hand-delivered on February 17, 1998, and which sought certain basic information relating to the Independent Counsel's relationship to the Jones v. Clinton civil case. Like your office, I am interested in "the truth's coming out." It is over a month later, however, and I still have received no response of any kind from the Independent Counsel. The Special Division's Order dated January 16, 1998, specifically recites that it approves "an expansion of prosecutorial jurisdiction in lieu of the appointment of another Independent Counsel." The point of my February 17 letter to the Independent Counsel was precisely whether he (as opposed to some other qualified person) should have been appointed by the Special Division under the facts of this case. The Ethics in Government Act explicitly provides that "[d]uring the period in which an independent counsel is serving under this chapter (i) such independent counsel, and (ii) any person associated with a firm with which such independent counsel is associated, may not represent in any matter any person involved in any investigation or prosecution under this chapter."

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
March 18, 1998
Page 5

28 U.S.C. § 594(j)(1)(A) . . . As my February 17 letter to the Independent Counsel made clear, the Chicago Tribune reported six days earlier that one of the Independent Counsel's partners in Kirkland & Ellis, Mr. Richard Porter, may have provided legal advice and services to Paula Jones in her suit against the President. I have written the Independent Counsel seeking information concerning this and other news reports concerning his own relations with Ms. Jones' lawyers. I specifically requested information "(i) concerning [the Independent Counsel's] own, Mr. Porter's, and any other Kirkland & Ellis lawyer's, employee's or agent's contacts with and assistance to Ms. Paula Corbin Jones and/or her attorneys or agents or supporting groups, and (ii) concerning what was conveyed to the Attorney General and the Special Division in January, 1998, about any such contacts and assistance, when [the Independent Counsel] sought an expansion of . . . jurisdiction to encompass the Jones v. Clinton case." I have heard nothing in response.

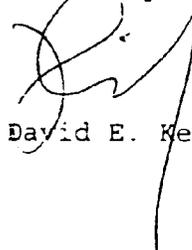
I will not repeat here my description of the many grave duties of state which are uniquely the President's. As I noted in my March 4 letter, "[w]hile it is true that not every moment of the day is absorbed by the duties of office, the President is extraordinarily busy on a range of important public issues, some of which are visible and some of which are not." The President leaves on a long-scheduled state visit to Africa this weekend, and he will be gone until April 3. He then is in South America on another state visit from April 15 to 20. Such trips require not only travel time but a great deal of preparation time, study, and analysis in advance and after the trip.

I believe that a meeting to discuss my concerns, as well as yours, would be fruitful, and I am available at your convenience for that purpose.

Again, I would respectfully ask you to read this letter to the grand jury and to make it part of the grand jury record, if your letter to me is shared with the grand jury.

I thank you for your courtesy.

Sincerely,



David E. Kendall

**Office of the Independent Counsel**

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

April 3, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

I write in response to your letter of March 18, 1998, in which you declined our sixth invitation for the President's testimony, and in response to our meeting of March 20, 1998, during which you declined to answer my question whether the President will ever voluntarily testify about the matters involving Monica Lewinsky.

As you know, upon receipt of your letter I immediately called you to take you up on your offer to meet and discuss our mutual concerns regarding our six invitations to the President. Notwithstanding the numerous misstatements in your letter -- which are addressed herein -- I was hopeful that in light of the President's public pledges of cooperation we could finally arrange terms under which the President would voluntarily testify about the matters involving Ms. Lewinsky. My hopes were dashed at our meeting when you simply refused to discuss any of the "issues." Not only did you merely repeat some of the inflammatory allegations in your letter, you avoided even addressing -- much less answering -- the question I began our meeting with: Will the President ever voluntarily testify about the matters involving Monica Lewinsky? You refused several times to answer this question. Indeed, when I asked if we were to address the "concerns" outlined in your letter to your satisfaction would the President then agree to testify, you still refused to answer. This exercise, in the context of the backpedaling and misdirection of your letters and the President's public statements, makes clear that the President has no

David E. Kendall, Esq.
April 3, 1998
Page two

intention -- and never has had any intention -- of cooperating with this grand jury or this investigation. We, of course, regret the President's apparent decision.

Now I will turn to the variety of irrelevant charges raised in your letter against this Office, the Independent Counsel, and Judge Starr's private law firm. Because our addressing these matters is evidently not dispositive for you, I will address them only briefly.

First, you suggest that the President's deposition in the Jones case amply substitutes for grand jury questioning. You are incorrect. As you are well aware, the jurisdiction of this Office and the scope of discovery in the Jones case are far from coextensive. While the deposition bears on matters within our jurisdiction, the grand jury investigation has unearthed many significant issues not addressed in the deposition.

Second, you accuse this Office of having "contrived to obtain the President's deposition testimony through improper and illegal means." This, too, is flatly incorrect. All evidence gathered in this investigation has been obtained lawfully and properly.

Third, you charge that this Office, Linda Tripp, and Richard Porter of Kirkland & Ellis "colluded" with attorneys for Paula Jones. As authority, you cite a number of the notoriously inaccurate media accounts of this investigation, many of which have been based upon statements by "unnamed presidential advisers." Let me set the record straight: This Office has not colluded with Ms. Jones's attorneys -- not directly, not indirectly, and not through Ms. Tripp, Mr. Porter, or any other person. With nothing more than a sheaf of newspaper articles in hand, it is irresponsible of you to charge otherwise.

Fourth, you contend that this Office has undertaken investigative steps without proper authority. We disagree. The expansion of our jurisdiction by the Special Division was preceded by a presentation of information to the Attorney General, a preliminary investigation of such information by her, and a subsequent recommendation to the Special Division. We, unlike you, believe the Attorney General knows and follows the law. She followed the law in this case. As your complaint is a legal argument about our authority to investigate, we suggest you raise it in a judicial forum.

David E. Kendall, Esq.
April 3, 1998
Page three

Fifth, you assert that the President has "cooperated in every possible way" with this investigation. You know, of course, that this is not true. You and the President have failed to produce financial records that have been under subpoena for several years. The Rose Law Firm billing records, for example, were "re-discovered" at the White House in January 1996 and had been under subpoena for many months. Jane Sherburne, then of the White House counsel's office, testified before the Senate that after the records' "re-discovery" she suggested to you that the forensic integrity of the records be preserved. Senate Hearing, 2/8/96, at 69-71. Ms. Sherburne further testified that her suggestion was dismissed. Id. You testified that you "did not regard this as a forensic matter," id. at 72, and, of course, the forensic value of the records was in fact compromised after handling by your office. In addition, as you know, I wrote you on March 6, 1998 and March 25, 1998, requesting that the President fully comply with subpoena number V002 and its instructions so that the grand jury can determine whether the President ever had any documents or things in response to the subpoena that have not been produced. You thus far have responded with only a vague statement that the President "might have given the President a few additional items, such as ties and a pair of sunglasses, but we have not been able to locate these items. The President frequently does not see and is not aware of numerous items which are sent to him by friends and supporters." This response is unsatisfactory and not in compliance with the subpoena. The grand jury needs the additional information demanded by the subpoena's instructions.

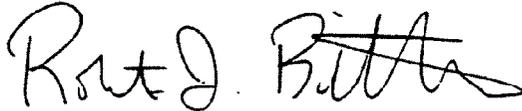
Finally, you reiterate that the President is a busy man. We do not disagree, and indeed are well aware that the President has weighty responsibilities besides his obligation to assist a federal grand jury investigating possible criminal conduct. Nonetheless, we believe that he has found and can continue to find the time to testify in judicial fora -- particularly given that we will work with you to time his appearance so as to reduce disruption to his schedule.

Those are our views on the matters raised in your letter. Since January 28, 1998, when we first invited the President to testify, the grand jury has grown increasingly eager to hear the President's testimony.

David E. Kendall, Esq.
April 3, 1998
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Having tried and tried, I will now try once again. Please give me a straightforward yes or no answer to the following question: Will the President ever agree to testify voluntarily about the matters involving Ms. Lewinsky? If the President chooses again not to give his testimony, so that the grand jury may at least receive some of his evidence, please provide this Office with any and all exculpatory evidence you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Bittman". The signature is written in a cursive style with a large, sweeping flourish at the end.

Robert J. Bittman
Deputy Independent Counsel

2320

LAW OFFICES

WILLIAMS & CONNOLLY

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EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1976)

DAVID E. KENDALL
(202) 434-5145

April 17, 1998

CONFIDENTIAL
RULE 6(e), F.R.CRIM.P., GRAND JURY SUBMISSION

Robert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

By Hand

Dear Bob:

Thank you for your letter of April 3, 1998. I will try once again to make clear our position with regard to the President's providing testimony on the Lewinsky matter, beyond the transcript and videotape of his deposition in Jones v. Clinton, which your Office now has and is free to submit to the grand jury. I have attempted to do this in my previous correspondence and in our meeting at the federal courthouse on March 20, 1998.

In my several letters and in our meeting, our position could not have been more clearly stated: we have serious objections to the origin and conduct of your Lewinsky investigation, and until those are satisfactorily addressed, we cannot, as a matter of professional duty to our client, allow the President to give further testimony at the present time. The issue remains open, however, and depends on your Office. We remain entirely respectful of the grand jury. Indeed, from recent press accounts, it appears that the grand jurors themselves are performing their civic duty with admirable commitment and at some sacrifice to their personal lives. Quite frankly, I believe if your Office were to provide the information I have sought over the past several months, this would lighten the burden on us, on you, and on the grand jurors.

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
April 17, 1998
Page 2

Since your letter states it will address my concerns only "briefly", I will not restate here the issues I have raised at some length in my previous correspondence. I would note only that, once again, your letter stonewalls my request for information concerning contacts between members of the Independent Counsel's law firm (Kirkland & Ellis) and the Paula Jones lawyers as of the January 16, 1998, expansion of your Office's jurisdiction to encompass the Lewinsky matter in the Paula Jones civil suit. My need for this information is obvious: if in fact personnel at Kirkland & Ellis have provided legal assistance in some way to the Jones side of the civil suit, Judge Starr would not have been qualified under the Ethics in Government Act to serve as independent counsel on the Lewinsky matter--some other individual, with no connection to the Jones litigation, would have had to have been selected. The information I seek is obviously in your custody and control: Judge Starr need only ask his law partners, if he is not in fact privy to it himself. I first wrote him on February 17, 1998, requesting this information, and I still have not had an answer to my letter. You will recall that I appended a copy of that letter to my March 4, 1998, letter to you--I will not do so again.

This matter is highly important under the statute, because when Congress enacted the independent counsel legislation, it permitted such counsel to remain in their private law firms and to take on the appointment as a part-time job. I do not fault nor have I criticized the Independent Counsel for remaining at his law firm (where, according to news reports, he has made \$1 million a year while serving as independent counsel, see, e.g., Time, Feb. 2, 1998)), but it is, obviously, extremely important that the conflict rules that permit such continued employment under the Act be followed. The statute provides that no person associated with the independent counsel's law firm may "represent in any matter any person involved in any investigation or prosecution under this chapter." 28 U.S.C. § 594(j)(1)(A)(ii). Thus, if someone at Kirkland & Ellis had "in any matter" represented Ms. Jones, Judge Starr could not properly have been appointed to investigate the Lewinsky matter.

It is true, as your recent letter asserts, that I have based my inquiry on media accounts. I do not have any reason to believe that (for example) the February 11, 1998, account is "notoriously inaccurate," as you suggest, since it appears in the Chicago Tribune, a reputable newspaper. The Tribune's report was in fact quite specific:

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"The Chicago-based law firm whose partners include Whitewater independent Counsel Kenneth Starr has begun an inquiry into whether a partner provided unapproved assistance to lawyers representing Paula Jones in her sex harassment case against President Clinton

[T]he law firm's internal inquiry is focusing on Richard Porter, a partner in the Chicago office and a former senior aide to President George Bush and Vice President Dan Quayle

John Corkery, associate dean at Chicago's John Marshall Law School, said the ethical issues raised are complicated ones. But in general, he said, 'If an attorney at the Kirkland firm is doing something that amounts to legal work for Jones, that creates a problem for Starr as the independent counsel because Starr's partner is pursuing a related matter in private practice that Starr has the obligation to investigate as part of his official duties.'

'The acts of Starr's partner in the practice of law are Starr's acts, by virtue of their partnership,' Corkery said."

You also assert that many statements in the accounts I cited in my February 17 letter are sourced to (in your words) "unnamed presidential advisers." With all respect, I do not see any such sources in these articles, although the February 11, 1998, Chicago Tribune article is in part based upon an unnamed "Kirkland & Ellis source".

I am also surprised at your cavalier dismissal of press reports as a basis for further inquiry. Your own Office has been quite willing even to take legal action on the basis of press accounts, when it has suited your purposes. For example, you successfully moved to disqualify Judge Henry Woods in the Court of Appeals for the Eighth Circuit "with nothing more than a sheaf of newspaper articles in hand" (to borrow your phrase), although you had chosen not to make such a motion to the Judge himself. As the Court of Appeals noted, "[t]he Independent Counsel relies primarily on newspaper articles to support his request." United States v. Tucker, 78 F.3d 1313, 1322-23 (8th Cir. 1996). By their very nature, questions involving possible conflicts of interest often arise because of media reports. In a proceeding in Arkansas last year involving the question whether the Independent Counsel suffered a conflict of interest because a job he had accepted in the future at Pepperdine University was

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
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Page 4

partially funded by a virulent opponent of President Clinton, Judge Eisele, a Republican United States District Court judge, commented: "[H]aving reviewed the media accounts regarding the Pepperdine issue, I find that it is incumbent upon the Court to make some kind of inquiry." In re Starr, 986 F. Supp. 1144, 1153 (E.D. Ark. 1997). Judge Eisele also observed that "[i]t is even possible that Mr. Starr, as Independent Counsel, should receive more exacting scrutiny regarding his professional responsibilities than other prosecutors," since the Special Division indicated (when it appointed him to replace Mr. Robert Fiske) that "'the Act contemplates an apparent as well as an actual independence on the part of the Counsel.'" 986 F. Supp. at 1155.

Your letter asserts that the expansion of your jurisdiction to include the Lewinsky matter was approved by the Attorney General and you suggest that this means that the Attorney General has in fact ratified your application. However, one of the very questions I have been asking for over two months--without receiving an answer of any kind--is precisely what the Attorney General was told when your Office suddenly requested an expansion of its jurisdiction in January. I have no idea whether the Attorney General was in fact informed of any contacts between Kirkland & Ellis personnel and the Paula Jones camp. The Attorney General is obviously not clairvoyant: if she were not informed of any such contacts, she could hardly be expected to know about them and to have made a decision as to whether, under the circumstances, Judge Starr was in fact the appropriate Independent Counsel to conduct the Lewinsky investigation. It is quite significant, I believe, that the Attorney General's application to the Special Division recites that "Independent Counsel Starr has requested that this matter be referred to him" (emphasis added). Thus, your office affirmatively and purposefully sought to extend its jurisdiction over the Lewinsky matter. This expansion request did not originate with the Attorney General.

Instead of providing responsive information, you have advised that we should "raise [this issue] in a judicial forum." We will accordingly assume that we will receive no further response to my February 17 letter and will proceed accordingly.

I will not repeat here my previously expressed concerns about your Office's investigative techniques in the Lewinsky matter. Recent press reports indicate that you plan to have Ms. Tripp testify before the grand jury. Should you have Ms. Tripp testify, I would respectfully request that you brief the grand jury concerning the illegality of Ms. Tripp's one-party taping of

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Robert J. Bittman, Esq.
April 17, 1998
Page 5

Ms. Lewinsky's telephone conversations in Maryland, the reasons your office wired Ms. Tripp to tape record Ms. Lewinsky's conversations, your knowledge of how the contents of this tape "leaked" to the news media, your knowledge of the reasons Ms. Tripp sought out your office rather than the United States Attorney's Office, the timing and details of your federal law immunity agreement with Ms. Tripp, and the restrictions (if any) you placed upon Ms. Tripp's transmittal of illegally acquired taping information (including the existence of illegally made tapes) to the Paula Jones lawyers in the week before the President's deposition.

I have responded to your comments concerning subpoena V002 in a letter dated April 13, 1998, and will not do so again here. I have also set forth fully in a letter to the Independent Counsel dated April 10, 1998, my concerns about having your Office investigate recent allegations concerning David Hale. In its April 9 letter to Judge Starr, the Department of Justice noted that "the United States Attorney's Office for the Western District of Arkansas was recently provided with information suggesting that David Hale, who we understand is a witness in various matters under your jurisdiction, may have received cash and other gratuities from individuals seeking to discredit the President during a period when Hale was actively cooperating with your investigation." The Department's letter also noted "suggestions that your office would have a conflict of interest, or the appearance of a conflict, in looking into this matter, because of the importance of Hale to your investigation and because the payments allegedly came from funds provided by Richard Scaife [the virulent opponent of President Clinton whom I referred to above]." The Independent Counsel's withdrawal from his Pepperdine commitments does not begin to solve the many problems that have been noted. For the reasons set forth in my April 10 letter, which involve both fairness and the perception of fairness, your Office should not have any involvement whatsoever in the investigation of this matter.

For over four years, the President has cooperated fully with the investigation of the Independent Counsel, which has now gone on longer than a Presidential term. He has voluntarily given testimony under oath on three different occasions to the Independent Counsel and twice to defendants (on each occasion, he was cross-examined by the Independent Counsel), he has submitted written interrogatory answers, he has produced more than 90,000

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Robert J. Bittman, Esq.
 April 17, 1998
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pages of documents^{1/}, and he has provided information informally in a variety of ways. This amounts to unprecedented cooperation^{2/} with an investigation of unprecedented duration,

^{1/} You assert that we "have failed to produce financial records that have been under subpoena for several years." This is simply false. You have not specified, nor could you, any such record in our possession that we have not produced.

^{2/} Because your letter contains an unwarranted and false ad hominem charge concerning the Rose Law Firm billing records, I respond here simply for the sake of the record, and I do not ask you to read this footnote to the grand jury, unless you choose to do so. I do not complain that you appear to have imperfectly complied with the Independent Counsel's publicly expressed philosophy (viz., "I have a job to do and you will never hear me besmirching anyone's reputation. Not once, never in all of this four years of activity, have I ever said anything to besmirch anyone's reputation. . . . And you will never find us doing that. And when I say me, I'm not meaning to personalize that. I mean my colleagues with whom I'm very privileged to serve." CNN, Special Event Transcript, April 2, 1998) (emphasis supplied). My point is instead that your smear is simply false.

You write that "the forensic value of the [Rose Law Firm billing] records was in fact compromised after handling by [my] office." You reference the highly partisan Senate inquiry chaired by Senator D'Amato, but you distort the meaning of the very testimony you quote. If you had reviewed the D'Amato testimony more carefully, you would have observed that the billing records were produced in accordance with procedures jointly agreed upon by me, Ms. Sherburne, and Mr. Schuelke. Moreover, your Office was in fact able to do fingerprint analysis of the billing records, because it made this evidence available to Senator D'Amato's Committee under cover of an undated letter from the FBI which Senator D'Amato released on June 4, 1996. The fact that your Office had identified Mrs. Clinton's fingerprints on the billing records (not surprisingly, since she was the billing partner on the account) was somehow leaked to the news media (see, e.g., Newsweek, May 6, 1996; Washington Times, April 30, 1996). In retrospect, this appears to be a preview of the highly prejudicial leaks we have experienced in the last three months. In any event, two years ago, I

(continued...)

WILLIAMS & CONNOLLY

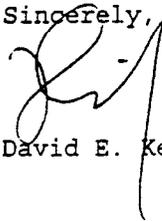
Robert J. Bittman, Esq.
April 17, 1998
Page 7

intrusiveness, and indefiniteness. That you now request we submit "exculpatory" evidence is perfectly consonant with the occasionally Alice-in-Wonderland nature of this whole enterprise. I am not aware of anything the President needs to "exculpate."

I would respectfully ask you to read this letter to the grand jury and to make it part of the grand jury record, if your recent letter to me is shared with the grand jury.

I thank you for your courtesy.

Sincerely,



- David E. Kendall

^{2/}(...continued)

wrote strenuous letters of protest, dated April 29 and 30, 1996, to the Independent Counsel about these leaks, receiving in reply a soothing response dated May 3, 1996 ("Your concerns are noted, and they are shared by this Office") and no further action.

Tab 2



Office of the Independent Counsel

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Washington, DC 20004
(202) 514-8688
Fax (202) 514-8802

July 17, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

As you know, beginning January 28, 1998, we, on behalf of the grand jury, have invited the President six times to testify voluntarily about the matters involving Monica Lewinsky. Despite his previous cooperation with other aspects of our investigations and his public pledges to cooperate fully with this investigation and provide "more rather than less, sooner rather than later," the President has unfortunately chosen to decline each and every invitation to give his information to the grand jury. The grand jury simply can wait no longer for the President's voluntary cooperation.

Pursuant to § 9-11.150 of the United States Attorneys' Manual and with all the requisite approvals thereunder, enclosed please find a subpoena for President Clinton to appear and give testimony before the grand jury on Tuesday, July 28, 1998, at 9:15 a.m. If the President agrees to comply with the subpoena and testify, we and the grand jury -- as we have previously stated -- will accommodate his schedule if he cannot appear on the 28th.

We believe you are aware of the status of your client. We would be pleased to state explicitly the status of the President if you desire.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Bittman".

Robert J. Bittman
Deputy Independent Counsel

Enclosure

United States District Court

FOR THE DISTRICT OF COLUMBIA

TO: William Jefferson Clinton

SUBPOENA TO TESTIFY BEFORE GRAND JURY

SUBPOENA FOR:

PERSON DOCUMENT(S) OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE United States District Court for the District of Columbia Third & Constitution Avenue, N.W. Washington, D.C.	COURTROOM Grand Jury, Third Floor
	DATE AND TIME July 28, 1998/9:15 a.m.

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):*

Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

U.S. MAGISTRATE OR CLERK OF COURT Nancy M. Winter-Whitins, Clerk (BY) DEPUTY CLERK <i>Margaret Spier</i>	DATE July 17, 1998 D1424
This subpoena is issued upon application of the United States District Court for the District of Columbia.	NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY Robert J. Bittman, Deputy Independent Counsel Office of the Independent Counsel 1001 Pennsylvania Avenue, N.W., Suite 490-Nort Washington, D.C. 20004 (202) 514-8688

*If not applicable, enter "none."

U.S. GPO: 1993 O 350-792/80398

Advice of Rights

- The grand jury is conducting an investigation of possible violations of Federal criminal laws involving: perjury, subornation of perjury, obstruction of justice, witness tampering, and other Federal criminal laws.
- Your conduct is being investigated for possible violations of Federal criminal law.
- You may refuse to answer any question if a truthful answer to the question would tend to incriminate you.
- Anything that you do say may be used against you by the grand jury or in a subsequent legal proceeding.
- If you have retained counsel, the grand jury will permit you a reasonable opportunity to step outside the grand jury room to consult with counsel if you so desire.

Tab 3



Office of the Independent Counsel

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

July 23, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

I write in regards to your request yesterday for additional time to respond to the grand jury's subpoena to President Clinton. Although I conveyed to you yesterday that we had decided not to give any additional time, you asked me to let you know by the close of business Friday, July 24, 1998, if our views changed. We are responding today to give you as advance notice of our decision as possible.

We have carefully reviewed your request and balanced it against the grand jury's desire -- and responsibility -- to complete this investigation as thoroughly and expeditiously as possible. We offer to withdraw the current subpoena to the President and issue a new subpoena with an appearance date of Friday, July 31, 1998, at 9:15 a.m. if you agree that you will not request any additional time or another continuance, either from this Office or the Court. As before, if the President agrees to comply with the subpoena and testify, we and the grand jury will accommodate his schedule if he cannot appear on the 31st. We believe this extension of time is entirely reasonable given that the President has been on notice since January that the grand jury wished his testimony and given that all the President must necessarily decide by July 31 is whether he will comply with the subpoena and testify. Kindly advise me by 4:00 p.m. tomorrow whether the President wishes to accept our proposal; otherwise, the current subpoena will remain in effect.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Bittman".

Robert J. Bittman
Deputy Independent Counsel

Tab 4

2339

LAW OFFICES

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July 24, 1998

CONFIDENTIAL

Robert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

By Hand

Dear Bob:

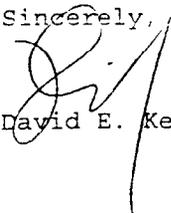
I write in response to your letter of yesterday, which I believe to be now moot.

The President is willing to provide testimony for the grand jury, although there are a number of questions relating to the precise terms and timing which must be worked out. If you are willing to work within the framework of the last three times the President provided such testimony and if you are sincere in your statement that you will work to accommodate his schedule, we should quickly be able to finalize the arrangements.

I will get to you by 4:00 p.m. Tuesday, but sooner if possible, a more detailed letter, which will include a date for testimony which will accommodate the President's other existing obligations.

I request that you withdraw the pending subpoena, since the issue of the subpoena itself is quite important to us. The precedential effect of such a subpoena is not an issue I have addressed in previous correspondence with you (which ended with my April 17 letter), but I will do so in my next letter.

Sincerely,


David E. Kendall

Tab 5

**Office of the Independent Counsel**

1001 Pennsylvania Avenue, N.W.
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Washington, DC 20004
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July 24, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

We are gratified by your response to my letter of yesterday, and we are pleased by the President's decision to provide testimony for the grand jury.

You indicate in your letter that the President "is willing to provide testimony for the grand jury" and you suggest that such testimony take place in a forum outside the grand jury, on an uncertain future date. We are happy to discuss arrangements for the President's testimony that will be consistent with concerns of security and dignity of the Office of the President. We remain interested, however, in obtaining a prompt commitment to a date certain for that testimony. As you know, we have invited the President on six occasions to testify before the grand jury, and its work continues apace. As a result, we are currently not inclined to withdraw the subpoena. Nevertheless, we would be happy to consult with you at your earliest convenience before next Tuesday morning to work out an acceptable schedule for the President's testimony.

Sincerely,

Robert J. Bittman
Deputy Independent Counsel

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Tab 6

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July 27, 1998

By HandRobert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004CONFIDENTIAL

Dear Bob:

This will acknowledge your letter dated July 17, 1998, enclosing a subpoena for the President to appear before the grand jury on July 28 and will follow up on my letter to you dated July 24, 1998.

As you are well aware, this extraordinary subpoena poses grave and literally unprecedented constitutional questions. While we are obviously cognizant of the holdings in United States v. Nixon, 418 U.S. 683 (1974) and Clinton v. Jones, ___ U.S. ___, 117 S.Ct. 1636 (1997), no case has ever held that a sitting President may be compelled by subpoena to provide testimony for a grand jury, much less to testify before a grand jury. In the past, Presidents have voluntarily provided information to prosecutors for legal proceedings in a variety of ways. President Clinton has twice given testimony at the request of defendants in criminal proceedings, after he had voluntarily given testimony to the Office of Independent Counsel on similar subjects, in circumstances where the defendants plainly had certain Sixth Amendment rights "to have compulsory process for obtaining witnesses in [the defendant's] favor." But neither this nor any other President has been compelled to give testimony to a grand jury by subpoena.

One of the most troubling aspects of this subpoena is its plain conflict with the impeachment provisions of the Constitution, since it is obvious that from the outset of the latest phase of your investigation you have considered the President to be a "target" of your investigation. We believe that the conclusion of then-Solicitor Bork in the investigation of Vice-President Agnew twenty-five years ago is the correct one:

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
July 27, 1998
Page 2

the "remarks [of the framers] strongly suggest an understanding that the President, as Chief Executive, would not be subject to the ordinary criminal process Their assumption that the President would not be subject to criminal process was based upon the crucial nature of his executive powers." Memorandum for the United States Concerning the Vice President's Claim of Constitutional Immunity, at 6, In Re Proceedings of The Grand Jury Impaneled December 5, 1972, Civ. No. 73-965 (D.Md.) (Oct. 5, 1973).

Accordingly, under circumstances in which you have apparently "targeted" your investigation on a sitting President, enforcement of a grand jury subpoena would violate the most fundamental separation of powers principles because it would invade the exclusive prerogatives of the Congress. Under Article I, the House "shall have the sole power of impeachment" and the Senate "shall have the sole power to try all impeachments." Under Article II of the Constitution, the President is duty-bound to uphold the separation of powers framework against unreasonable encroachment by other branches or by an unelected Independent Counsel. In order to protect the institution of the Presidency, we are prepared to litigate to preserve these important principles.

We hope that will not be necessary. For the past four years, we have worked with your Office to devise ways for the President to cooperate with the investigations of the Office of Independent Counsel in a manner that did not infringe his Article II responsibilities. He has voluntarily and unstintingly provided an enormous amount of information in response to a great many requests from the OIC. He has, without the compulsion of subpoena, given testimony under oath on three different occasions to the Independent Counsel. He has twice given testimony for defendants in criminal proceedings and been subject to cross-examination by the Office of Independent Counsel. He has provided more than 90,000 pages of documents to the OIC, he has submitted interrogatory answers, and he has provided information informally in a variety of ways. This amounts to extraordinary and unprecedented cooperation with an investigation of extraordinary and unprecedented duration, intrusiveness, and indefiniteness.

In my letters to you over the last few months, I have set forth in detail my concerns about your Office's investigation. I will not reiterate those here, but my reservations, as set forth in my correspondence, are substantial and, I believe, well-founded. Regarding leaks, for example,

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
July 27, 1998
Page 3

Chief Judge Johnson's findings with respect to our three show-cause motions provide dramatic confirmation of my concerns.

Despite our serious and enduring concerns about the OIC's investigation, as I indicated in my July 24 letter, the President remains willing to provide the grand jury with the information it seeks, so long as he can do so in a way that is consistent with the obligations of his Office. We believe that, with your assistance, the serious constitutional questions presented here by a subpoena may be mooted. Our proposal is made in good faith and after serious deliberation. It reflects a meaningful attempt to accommodate both your needs and those of the Presidency. We are not suggesting other more limited options utilized by Presidents in the past, such as written interrogatories, which while precedented and defensible, would, we believe, be less satisfactory. The President is prepared to provide the information you seek under conditions that (1) are consistent with the precedents established in this investigation and (2) preserve the constitutional questions both for your Office and the President for later formal legal determination, if necessary.

In our correspondence during the last few months, you have stated that the OIC "fully acknowledge[d] that the President has immense and weighty responsibilities" and that the OIC "want[ed] in every way to take fully into account those grave duties of state." (Your letter to me of March 2, 1998). You stated you wanted to "reiterate" that the OIC had "profound respect for the institution of the Presidency." (Your letter to me of March 13, 1998). We believe that the respect for the Office of the President, which you acknowledge, and which we share, requires that any testimony of the President be given under the following conditions:

- 1) The subpoena must be withdrawn. The President has on three different occasions voluntarily given sworn testimony when requested by the OIC. On two other occasions (in 1996), the President testified at the behest of two defendants by videotape at their trials. In our view, however, the constitutional considerations raised by your July 17 subpoena are quite different since, for example, a defendant has a Sixth Amendment right to compulsory process to present witnesses in his defense. For the separation of powers reasons discussed above and to avoid a precedent harmful to the institution of the Presidency, we believe that any testimony which the President provides now must be on a voluntary basis.

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
July 27, 1998
Page 4

2) Any testimony by the President must be given by deposition at the White House, under the conditions of the first three OIC interviews. We anticipate that the examination will be (as it has been in the past) respectful, non-repetitive, and given within a specific time period (perhaps three hours). You will inform us of the specific areas you intend to cover (although, obviously, not of the questions you intend to ask). You will make a good faith effort to provide us documents in advance about which you plan to question the President, so he does not have to waste time at the deposition reading them for the first time.

3) Safeguards to prevent leaks must be devised. The President's January 17, 1998, deposition in the Paula Jones case was leaked to the press in flagrant violation of a court order. In this investigation, Chief Judge Johnson has entered orders for the OIC to show cause why it or individuals therein should not be held in contempt for violating Rule 6(e), Fed. R. Crim. P.: "The Court finds that the serious and repetitive nature of disclosures to the media of Rule 6(e) material strongly militates in favor of conducting a show cause hearing." (June 19, 1998, Order, at 5). Moreover, "[s]hould the Court find a direct violation of Rule 6(e), the Court reserves the right to take any appropriate steps, including referring the matter to the United States Attorney, the Department of Justice, or a special master for criminal contempt investigation and proceedings." (June 26, 1998, Order, at 2 n.1). We do not seek to require impossible conditions or guarantees, but in light of the nature of the subject matter, the intense and corrosive media interest, and the history of leaks, there must be strict safeguards as to attendance, handling of the transcript (perhaps lodging the only copy with the court until it is presented to the grand jury), dissemination, etc.

4) This testimony will be given only after the President has an adequate time to prepare for it. In Clinton v. Jones, supra, the Supreme Court remarked the "'unique position in the constitutional scheme'" that the Presidency occupies and noted that the President "occupies a unique office with powers and responsibilities so vast and important that the public interest demands that he devote his undivided time and attention to his public duties." 117 S.Ct. at 1646. The Court held in that case that "[t]he high respect that is owed to the office of the Chief Executive, though not justifying a rule of categorical immunity, is a matter that should inform the conduct of the entire proceeding, including the timing and scope of discovery," id. at 1650-51 (footnote omitted), and its holding was based upon its assumption "that the testimony of the President, both for

WILLIAMS & CONNOLLY

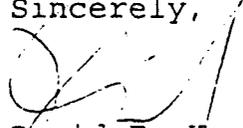
Robert J. Bittman, Esq.
July 27, 1998
Page 5

discovery and for use at trial, may be taken at the White House at a time that will accommodate his busy schedule," id. at 1643.

I last wrote you three months ago concerning the possibility of the President testifying, and I have heard absolutely nothing from you in the interim. In that and other letters, I have made clear that the President's schedule is an extremely full one that is set well in advance. Nevertheless, suddenly and without any advance notice, I received your subpoena at 6:00 p.m. on Friday, July 17, while the President was away on a long-scheduled trip to Arkansas and Louisiana, and with other significant travel scheduled, seeking his grand jury testimony a mere ten days later. This has recently been an exceptionally busy period, with the trip to China, the continuing Asian debt crisis, the well-publicized events in Russia, tensions in the Middle East and in Ireland, and a host of domestic concerns, such as the drought and a pressing legislative agenda before this Congress ends. We would be derelict in our professional duties if we allowed the President to give testimony without adequate preparation. (Unlike the OIC, the President is one person, with many different public responsibilities). Given his present schedule and duties, it is inconceivable that he would be able to testify in the immediate future. Between today and August 15, the President is already scheduled to be out of town for six days and has an exceptionally busy schedule while here. He has a long-scheduled family vacation between August 15 and 30, but much of this will be absorbed with preparation for a critical trip to Russia and Ireland from August 31 through September 6. The first date the President could conceivably testify consistently with his other obligations would be Sunday, September 13, although we would, in simple fairness, request that his testimony occur on Sunday, September 20. While we are not aware of the witnesses who remain to be interviewed by the OIC, we believe that the pending legal disputes which are now sub judice will plainly not be resolved before mid-September, and so we do not believe that a mid-September date for the President's testimony would itself unduly delay the completion of your investigation. It certainly would be sooner than any date you might anticipate were you to precipitate a legal confrontation.

I look forward to talking with you at your earliest convenience.

Sincerely,



David E. Kendall

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Tab 7

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**Office of the Independent Counsel**

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

July 27, 1998

VIA HAND DELIVERY

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

Thank you for your letter of July 27, 1998, which we received at 1:30 p.m. today. Although there is much in your letter with which we disagree, there is no reason at this point to engage in an extended discussion. Instead we wish to remain focused on the subject of obtaining the President's testimony for the grand jury.

Although we remain willing to accommodate the President's security and dignity concerns, we cannot agree with the other restrictions and conditions you suggest. Most importantly, we cannot agree to delay the testimony for another seven-plus weeks. The President has been aware since late January that the grand jury wants to hear his story, and he has declined numerous invitations to provide his testimony voluntarily. Therefore, further extensive delay of the type you propose is simply unacceptable. As a result, we will not withdraw the existing subpoena (as continued per today's telephone call, to 1:30 p.m. on July 28th). If, however, by tomorrow at 1:30 p.m., the President commits in writing to testify on a date certain on or before August 7, 1998, then we will continue the subpoena until that date. If the President agrees to a date certain, we will of course work closely with you to accommodate the logistical concerns that you have raised.

Sincerely,

Robert J. Bittman
by [Signature]

Robert J. Bittman
Deputy Independent Counsel

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Tab 8

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103RD STORY of Level 1 printed in FULL format.

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Chicago Tribune

July 27, 1998 Monday, NORTH SPORTS FINAL EDITION

SECTION: NEWS; Pg. 1; ZONE: N

LENGTH: 1137 words

HEADLINE: STARR SUBPOENA POSES CONSTITUTIONAL CONFLICT

BYLINE: By Naftali Bendavid, Washington Bureau.

DATELINE: WASHINGTON

BODY:

In subpoenaing President Clinton, Independent Counsel Kenneth Starr has delved into new legal territory and ignited a chain of events that ultimately could lead to a constitutional crisis.

Most starkly, a subpoena is a court order that, if defied, is punishable by imprisonment. But it seems clear that the president of the United States cannot be imprisoned under the Constitution because that would amount to the republic paralyzing its leader. So the meaning of this subpoena is unclear.

More broadly, the Constitution specifically provides a way to pursue criminal charges against a president--the impeachment process, under which Congress can subpoena the president if it chooses. To many scholars, that suggests that an ordinary prosecutor or even an independent counsel may not summon the president to testify.

"This is an open constitutional-law question," said Georgetown University law professor Paul Rothstein, an expert in constitutional and criminal law. "We are sailing blindly on a dark sea. We don't know what will be found to be the constitutional solution."

Meanwhile, White House officials Sunday continued their refusal even to confirm that Clinton has been served with a subpoena. Despite widespread reports that Starr issued such a summons last week, top advisers, including Rahm Emanuel, would say only that negotiations are under way on how Clinton can provide Starr the information he seeks.

Starr's subpoena may be little more than a bargaining move, a way to force a reluctant Clinton to give his version of the events surrounding the allegations that he lied under oath about a supposed affair with White House intern Monica Lewinsky.

If the negotiations fail, Clinton could decide to fight the subpoena. That would set up a clash between the judicial and executive branches that, while echoing President Richard Nixon's defiance when ordered to turn over the Watergate tapes, would be essentially unprecedented.

Chicago Tribune, July 27, 1998

A small group of scholars argues that Starr has every right to subpoena Clinton. The president has declined to voluntarily appear before the grand jury, these observers note, and that leaves an official summons as the only way for Starr to obtain testimony vital to his investigation.

The whole point of our system of government, this argument goes, is that no person is above the law.

"The government is entitled to every person's testimony," said Mark Tushnet, a constitutional-law expert at Georgetown University. "If there is a sufficient showing of need for his testimony, he ought to be treated the same as any other citizen."

While Clinton certainly could not be imprisoned, this camp argues he could be punished in many other ways if he disobeys the subpoena.

The president could be fined, for example, which would not interfere with his ability to run the country. And if nothing else, the political consequences to the president of flouting a court order would be so high he would be reluctant to do so.

"In the real world, there are sanctions other than putting someone in jail," Tushnet said. "There would be, as they called it in Watergate, a firestorm of public criticism. There would be the threat of impeachment. Those are appropriate things for the legal system to take into account."

Still, most experts believe it is constitutionally dubious for a prosecutor to issue a presidential subpoena or at least to try to enforce it.

The executive and judicial branches, along with the legislative, are supposed to be roughly co-equal, and the notion of a president at the mercy of a court makes many observers nervous.

Bruce Fein, a constitutional lawyer who served in the Justice Department during the Ronald Reagan administration, ridicules the notion that the president is just like any other citizen under the law.

"He is not like every other citizen," Fein said. "It's absurd. He was elected to be president."

The appearance of the president before the grand jury would bring his presidency to a halt, Fein argued, and the Constitution says that can only be done by Congress in an impeachment proceeding.

"The political fallout of having a president appear before a grand jury would be paralysis," Fein said. "The whole country would be consumed. It would place the Clinton presidency in *crisis mortis*, which is something that can be done but only through an impeachment proceeding."

In a grand jury proceeding, witnesses are questioned in secret by one or more prosecutors without their attorneys present. Witnesses uniformly describe the experience as intimidating.

It is dangerous to subject the president, with his knowledge of national

Chicago Tribune, July 27, 1998

security and other sensitive matters, to that sort of rapid-fire questioning, according to University of Chicago law professor David Strauss.

"In an imaginary world, you could have the president step outside the grand jury room after each question and meet with the head of the CIA and the head of the Joint Chiefs of Staff and say, 'What do you think?' " said Strauss, who assisted Clinton's legal team in the Paula Jones sexual-harassment case.

In the real world, that can't happen, Strauss added. "It's hard to think it was the constitutional plan for the president to answer questions like that," he said.

Only twice, scholars say, have the nation's courts seen an issue even remotely like this. In 1807, President Thomas Jefferson was subpoenaed to give information in the trial of Aaron Burr, who was charged with treason. Jefferson declined to testify, but he supplied documents that seemed to satisfy prosecutors.

In 1974, the Watergate special prosecutor sought tapes Nixon had made of conversations in the Oval Office. Nixon fought the subpoena, but the Supreme Court ruled 8-0 against him.

Some say the Nixon case suggests that Clinton must respond to Starr's summons. But others emphasize the difference between a president turning over evidence such as tapes and appearing in person to be peppered with questions.

"This is a big game of chicken, as all negotiations between lawyers are," Tushnet said. When it comes down to it, he added, even top scholars have absolutely no idea how the courts would rule.

The issue highlights yet again the quirky nature of the independent counsel system. No ordinary federal prosecutor would be likely to subpoena the president because the president is his boss and could order him not to do so.

To Strauss, the gravity of the constitutional issues contrasts sharply with the triviality of the underlying allegations, which involve possible perjury in a case that was dismissed by a court.

"I can't imagine there is a real-life prosecutor who would spend more than 10 minutes on a case like this," Strauss said, "let alone establish a new constitutional precedent."

THE LAW.

LANGUAGE: ENGLISH

LOAD-DATE: July 27, 1998

123RD STORY of Level 1 printed in FULL format.

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ABC NEWS

SHOW: ABC GOOD MORNING AMERICA SUNDAY (10:00 am ET)

JULY 26, 1998

Transcript # 98072605-j02

TYPE: INTERVIEW

SECTION: NEWS

LENGTH: 614 words

HEADLINE: PRESIDENTIAL SUBPOENA ISSUES

GUESTS: PAUL ROTHSTEIN

BYLINE: AARON BROWN

HIGHLIGHT:

LAST DANCE ON LEWINSKY CASE ABOUT TO BEGIN

BODY:

THIS IS A RUSH TRANSCRIPT. THIS COPY MAY NOT BE IN ITS FINAL FORM AND MAY BE UPDATED.

AARON BROWN, Host: Well, it does indeed seem like the last dance on the Lewinsky case is about to begin. So we're going to talk a bit about Kenneth Starr's attempt to subpoena the President. He has issued the subpoena. There are lots of questions here, as we've been suggesting this morning, legal and political. Some of those tend to run together.

Joining us this morning is Georgetown law professor Paul Rothstein. He joins us from Washington. Good morning, sir.

Prof. PAUL ROTHSTEIN, Georgetown University: Good morning, Aaron.

AARON BROWN: Well, I guess because we are in uncharted waters, it's hard to give

ABC GOOD MORNING AMERICA SUNDAY, JULY 26, 1998

a clean answer to the most basic question, which to me is, does he have the right to subpoena the President?

Prof. PAUL ROTHSTEIN: Well, the question is an open one under constitutional law. He can probably issue the subpoena, but the big question is whether the President can be forced to comply with it. What are you going to do, throw a president in jail if he doesn't comply with it? That would tie up the whole country. That would disable the people's president.

The Constitution provides for the only way to get a president out, which is impeachment. There a separation of powers in the Constitution. One branch of government, the courts, is not supposed to intrude on the other branches, the executive, which is the President. But we just don't know.

In the Nixon case, President Nixon was commanded to give up tapes, and in the Paula Jones case, the Supreme Court said President Clinton must respond to a civil lawsuit. But that's all different than requiring the person of the President to appear in a criminal inquiry before a grand jury, where he is the probable target.

AARON BROWN: And -- which is another question. I mean, isn't the argument -- or might the argument from the prosecutor's office be, "Well, we don't intend to indict the President. We're not sure we can. That's really the Congress's job. So he's not really a target of the investigation"?

Prof. PAUL ROTHSTEIN: Well, that would be one of the arguments. The constitutional law question is open. But that would be an argument on one side. But I don't think either side wants to have push come to shove and take this on up to the Supreme Court and maybe lose it. You know, both sides see there's a risk of loss and embarrassment and delay. Starr wouldn't want delay, so maybe that's why they're negotiating, you know, over something less than full grand jury testimony.

AARON BROWN: Read some tea leaves for me, because I'm a little befuddled, which is not unusual in my case, that he went for the President first and not Ms. Lewinsky to start the end game. What do you think his strategy, him, Starr, being here, what is his strategy?

Prof. PAUL ROTHSTEIN: Well, you see, the President is probably getting a lot of information from witnesses themselves as they appear before the grand jury. And then the President will try to fashion his testimony to be consistent with that, insofar as he can, whether he's a guilty president or an innocent president.

So if Lewinsky went first, the President would have that additional...

AARON BROWN: Got it.

Prof. PAUL ROTHSTEIN:... piece of the jigsaw puzzle.

AARON BROWN: Paul, thanks. Paul Rothstein, a law professor at Georgetown University, helping us understand what is quite a complicated legal and political question that both Kenneth Starr and the White House face this morning now.

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Page 5

ABC GOOD MORNING AMERICA SUNDAY, JULY 26, 1998

(Commercial Break)

LANGUAGE: ENGLISH

LOAD-DATE: July 26, 1998

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WASHINGTON, DC 20005-5901

VIA HAND DELIVERY

Robert J. Bittman, Esquire
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, NW
Suite 490-North
Washington, DC

Received by: Monique T. Jones

Date: 7/28/98

Time: 1:10

2365

UNDER SEAL

Tab 53

2368

SEALED

SEALED

SEALED

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

Misc. No. 98-267

MOTION TO CONTINUE

Washington, D. C.
July 28, 1998
4:30 p.m.

.....

TRANSCRIPT OF STATUS HEARING
BEFORE THE HONORABLE NORMA HOLLOWAY JOHNSON
CHIEF JUDGE, UNITED STATES DISTRICT COURT

APPEARANCES:

For the Office of
Independent Counsel:

ROBERT BITTMAN, ESQUIRE
SAUL WISENBERG, ESQUIRE
JOSEPH DITKOFF, ESQUIRE

For the Movant,
President Clinton:

DAVID E. KENDALL, ESQUIRE
NICOLE SELIGMAN, ESQUIRE
MAX STIER, ESQUIRE
ALICIA MARTI, ESQUIRE

Official Court Reporter:

GORDON A. SLODYKO
4806-A U. S. Courthouse
Washington, D. C. 20001
(202) 273-0404

Computer-Aided Transcription of Stenographic Notes

P R O C E E D I N G S

1

THE COURT: Good afternoon.

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COUNSEL: Good afternoon, Your Honor.

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THE COURT: All right.

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THE DEPUTY CLERK: Miscellaneous Case Number 98-267,
In re Motion to Continue. Representing the Office of the
Independent Counsel are Robert Bittman, Saul Wisenberg, and
Joseph Ditkoff. Representing President Clinton is David
Kendall, Nicole Seligman, Max Stier, and Alicia Marti.

Counsel, I received this afternoon President Clinton's
motion for continuance. I'm sure the Office of Independent
Counsel would like a chance to respond to that motion. In the
interest of time, and certainly in light of the public interest
in moving this matter expeditiously, I will allow each side to
present oral argument on the motion for continuance rather than
asking the parties to submit written responses. I will hear
from each of you for I hope not more than ten minutes a side
and then make my ruling. If you need more than ten minutes, I
certainly will grant you additional time. But I would hope
that we could do it in about ten minutes a side.

And since it is the President's motion, I will hear
from Mr. Kendall first.

MR. KENDALL: May it please the Court. We've moved
for a two-week continuance of a subpoena ad testificandum
delivered to counsel for the President on Friday, July 17th.

1 In some ways, Your Honor, I regret the need to burden you with
2 this motion; I think it was unnecessary. But we were unable to
3 get a continuance worked out with the Office of Independent
4 Counsel.

5 I would like to explain a little about the background
6 of this, if I may. This is not the first time the President's
7 testimony has been sought. Indeed, on three different
8 occasions he has given testimony at the behest of the
9 Independent Counsel during the Whitewater investigation. The
10 first time this occurred was in June of 1994, when Mr. Fisk was
11 Independent Counsel. The second time was in April of 1995,
12 after the present Independent Counsel was appointed on August
13 5th, 1994. And the third time was in July of 1995. Now, on
14 each occasion we were able to work out a mutually acceptable
15 way of providing for this testimony.

16 The President also testified twice by videotape in
17 criminal trials of defendants indicted by the Whitewater grand
18 jury in Arkansas. And on those occasions, the Independent
19 Counsel was able to cross-examine the President.

20 As is clear from our motion, we had correspondence
21 with the Independent Counsel earlier this spring about the
22 President voluntarily appearing. I had many concerns about
23 this. They were set forth in the correspondence. That
24 correspondence really lapsed in April. The next thing we heard
25 was the letter attached to the subpoena which was delivered to

1 me at approximately 6:00 p.m. Friday, July 17th.

2 Your Honor, I initially sought time because this is
3 the summer. Various people are somewhat scattered.

4 Mr. Kantor, for example, is in China. He's been in China --

5 THE COURT: Mr. who?

6 MR. KENDALL: Mr. Mickey Kantor.

7 THE COURT: Oh, okay.

8 MR. KENDALL: One of the President's private attorneys
9 who has been advising on this matter.

10 We were, however, able to make a quite specific
11 proposal to the Independent Counsel, which was delivered
12 yesterday, and that is at Tab 6 of our papers. This is a
13 letter in which I try to outline some of our concerns, how they
14 may be met. It provides a date, a specific date for the
15 President to give testimony and an alternative date. And that,
16 I hoped, would be a good faith offer that would allow us to
17 negotiate, as we have in the past, and settle on both the
18 timing and terms of the President's testimony.

19 I was surprised that the Independent Counsel refused
20 to withdraw or suspend this subpoena, and therefore, I made
21 this motion. I think it unseemly for the President of the
22 United States to be in any way in violation of legal process.
23 I think there are obvious reasons for that. And therefore, in
24 an effort to avoid that, we made a motion for a brief
25 continuance.

1 Your Honor, there are no deadlines, there are no
2 statutes of limitation, there are no pending trials. There is
3 really nothing substantive to warrant the denial of this very
4 brief continuance.

5 I think that we may not in fact need the two weeks.
6 It may be possible that we can very quickly work with the
7 Independent Counsel to come to an agreement on the terms and
8 timing. But as the motion papers make clear, this is a
9 literally unprecedented legal act. The testimony of the
10 President has never been compelled before a grand jury before,
11 and there are very serious constitutional questions, the
12 litigation of which would be quite time-consuming. We don't
13 necessarily want to have to tackle those questions if we can
14 come to an agreement that would allow both sides -- this has
15 happened often in this investigation -- to maintain their
16 positions but work together to get by a common problem.

17 The President of the United States -- I would be
18 making this motion if it were anybody, in order to get the
19 requisite time to try and work something out; and if things
20 can't be worked out, to get the input of the people necessary
21 to determine the proper arguments to be made on behalf of the
22 President of the United States. The President is the
23 President, however. He has public duties. And the language of
24 the Jones case, the Clinton versus Jones case, is, I think,
25 quite on point here because, while the Supreme Court did rule

1 that the President while in office could be subjected to civil
2 litigation, it also ruled that the conduct of that litigation
3 had to be undertaken by the supervising judge with great
4 sensitivity to the President's duties and great deference to
5 the many demands on his time.

6 It is difficult to convey -- I have represented busy
7 people before. It is difficult to convey how busy the
8 President is, how many demands there are on his time. And in
9 the past it has taken us time to work out not only a time for
10 the President to testify, but a time in which he can be
11 adequately prepared, because he has many duties and many
12 demands. And every client deserves the effective assistance of
13 counsel in getting them ready to testify so they can testify as
14 effectively and accurately as possible.

15 We quoted some of the language in Clinton versus
16 Jones. One of the things the Court stated was it articulated
17 the assumption that any testimony from the President may be
18 taken at a time that will accommodate his busy schedule. Your
19 Honor, again, I think that the -- we've set forth in the letter
20 the considerations that are important to us, considerations
21 about the President's schedule. And we respectfully submit
22 that this continuance is not lengthy. It may in fact make
23 unnecessary other litigation. And we respectfully would
24 request that the Court grant us a two-week continuance.

25 THE COURT: What do you want to do with the two weeks?

1 You know, you ask me for a two-week continuance. Are you
2 asking me to give you two weeks to let the President respond to
3 the subpoena, or are you asking me to give you two weeks to
4 determine how you wish to respond to the subpoena? Just what
5 are you asking me for?

6 MR. KENDALL: I think the former, Your Honor. I think
7 it's the former.

8 THE COURT: Well, since I've said a couple of things,
9 you'd better tell me what my former is.

10 MR. KENDALL: The former, Your Honor, as I understood
11 it, was to enable the President to determine how most
12 appropriately to respond to the subpoena.

13 It may be -- and I don't know what the -- because I
14 didn't -- I've had communications with Mr. Bittman. I don't
15 know. My own view is that we should take testimony as we have
16 done it before. That has the great value of precedent. And I
17 think not only judges, but lawyers, there's a value in doing
18 things the way they've been done in the past. I think if we
19 can do that and find a date, the rest of the motion will be
20 moot and we will come to agreement on a time and terms. That's
21 what I hope will happen. We will try to make that happen.

22 Now, it's possible that we will not be able to come to
23 those terms. A subpoena has been issued here. It's possible
24 that the response would be some kind of a motion. And that
25 would be done at the end of that two-week period.

1 So, I think what happens at the end of the two weeks
2 really depends on what goes on during it.

3 THE COURT: So you're really not seeking just a two-
4 weeks continuance of the return of the subpoena. You are
5 actually seeking two weeks to determine what you want to do
6 with respect to the subpoena.

7 MR. KENDALL: Your Honor, I think that's correct,
8 although --

9 THE COURT: Because the way I understand it -- I could
10 be wrong, because I haven't seen the subpoena, and I haven't
11 asked anybody to see it, but the way I understand it, the
12 subpoena that he received in July stated that he should appear
13 in person today. Is that correct?

14 MR. KENDALL: That's correct, Your Honor.

15 THE COURT: Okay. So, what you're saying to me is
16 you're not asking me to just continue that appearance for two
17 weeks. You're asking me to give you two weeks to raise further
18 or additional legal argument.

19 MR. KENDALL: Your Honor, I don't know. It seems to
20 me that I am asking you to continue it as well. What we don't
21 want to have is the President in violation of the subpoena.
22 And therefore, in the normal case you would phone up the
23 prosecutor and say, "You've subpoenaed my client for Monday;;
24 she's going to be in Chicago that day. Could you move it to
25 Wednesday?" And normally, that's possible.

1 THE COURT: Yes.

2 MR. KENDALL: Depending on the grand jury.

3 Here, I think if we can get the continuance, in the
4 interim I hope we will be able to work out an agreement whereby
5 we won't have to come back to the Court at all, we will do the
6 testimony. If we can't, then at the end of that period we
7 would file a motion.

8 THE COURT: All right.

9 MR. KENDALL: Thank you, Your Honor.

10 THE COURT: Thank you.

11 I'll be happy to hear from you now, Mr. Bittman.

12 MR. BITTMAN: Good afternoon, Your Honor. Robert
13 Bittman, on behalf of the United States.

14 Let me clarify something as to how we got involved in
15 the chronology of what occurred. It was exactly six months ago
16 today that we invited the President the first time to appear
17 before the grand jury. Six months ago today.

18 Mr. Kendall correctly referred to the fact that our
19 office has received testimony from the President before. That
20 was via negotiation. But it was always with an invitation
21 first, which the President accepted immediately, and then we
22 hammered out some of the details as to when and how the
23 President would testify.

24 In this case, we, and the grand jury, I might add,
25 felt it necessary to issue a subpoena to the President because

1 the President had refused six invitations to testify. They
2 were, frankly, just, in my words, stringing us along, and the
3 grand jury. The President publicly stated that he was prepared
4 to cooperate with the investigation and give information sooner
5 rather than later, more rather than less, and yet he refused --
6 or declined, rather, six consecutive invitations to testify.

7 As you know, the grand jury has been working very,
8 very hard, at great sacrifice to them. It has had effects on
9 their families; it has had job effects. And they've been
10 working very, very hard. They have been very gracious in
11 allowing us extra days and extra time recently.

12 This litigation -- or, pardon me, this investigation
13 has also had a number of parties assert various privileges that
14 have burdened not only this Court but the Court of Appeals, and
15 some of them have gone all the way to the Supreme Court.

16 And we have tried to move things along as
17 expeditiously as possible. The grand jury has been working
18 very hard. And it is time to receive the President's
19 testimony, if he so chooses.

20 THE COURT: And you say there have been six
21 invitations?

22 MR. BITTMAN: There have been six invitations.

23 THE COURT: All right. And how did those invitations
24 go? Were they in writing, as opposed to oral?

25 MR. BITTMAN: The first invitation was oral. The

1 other five were all in writing. And I believe Mr. Kendall
2 appended all of the invitations to his pleading. All of them
3 are in there.

4 THE COURT: All right.

5 MR. BITTMAN: And then Mr. Kendall's responses are all
6 there, also.

7 THE COURT: All right.

8 MR. BITTMAN: With regard to the President's schedule,
9 he is a very busy person. And the Jones v. Clinton case makes
10 it clear that the justice process should accommodate the
11 President's schedule and should defer to him in his official
12 capacity. I'm sure Mr. Kendall knows the President's schedule
13 better than I do, but we have done some research, even in terms
14 of when we set today, to make sure that he was in town. We've
15 checked it in the future, too. And our understanding is that
16 the President, for example, is going away this weekend for some
17 fund-raising events and for some rest and relaxation, and then
18 he's taking a two-week vacation in August.

19 We do not want to interrupt the President's foreign
20 trips or any official business that the President, obviously,
21 will be involved in. But we think the timing is right. The
22 grand jury, you know, has been working, once again, as I said,
23 very hard. And I don't think I want to reveal to Mr. Kendall
24 exactly why the grand jury wishes the President's testimony
25 now. And we're certainly not obligated to, and we're not going

1 to. But this is the time.

2 We have tried to accommodate the President's schedule.
3 We have offered innumerable dates through August 7th. We will
4 go -- well, we haven't worked out the exact, precise details of
5 how we would receive the President's testimony, but I'm
6 confident we can do that if we get an agreement from the
7 President that he will appear before -- in the very near
8 future. And that just hasn't been forthcoming.

9 The date offered by Mr. Kendall in mid-September is
10 just unacceptable. It is just unacceptable to the grand jury's
11 schedule and to the grand jury's investigation. We just cannot
12 wait that long for the President's testimony.

13 The investigation is very, very important. The
14 President has so stated that. And I don't think that the
15 investigation should wait for him to play golf, for
16 fund-raising events, and for his vacations.

17 Mr. Kendall in his papers discusses that this could
18 raise some sort of a constitutional crisis. We don't believe
19 so. We have thoroughly reviewed the law and we believe we are
20 absolutely entitled, with the grand jury's approval, to issue a
21 subpoena to the President. The Nixon case made clear that the
22 President of the United States may be subpoenaed in a criminal
23 trial. The Jones v. Clinton case itself authorizes a court
24 to -- that the President appear at a deposition in a civil
25 case. Clearly, if he has to appear in a civil case and answer

1 to civil charges, he would have to answer a criminal grand jury
2 subpoena.

3 The President also, as we've discussed, has appeared
4 before. He's provided depositions to us. He's appeared in
5 criminal trials. He was subpoenaed by the defense in two
6 trials in Arkansas. He testified in those trials -- after
7 being deposed, but he testified. And then in this case, we
8 issued a grand jury subpoena duces tecum, for documents, to the
9 President early on in the investigation and he complied with
10 that subpoena. I think it's odd now to all of a sudden say,
11 well, he's not going to comply with this one.

12 So, unless Your Honor has any questions for me. We
13 just want to get this resolved. We wish to know exactly what
14 the President is going to do.

15 THE COURT: So what I understand from you is that you
16 do maintain that the grand jury wants to have the President
17 appear before it.

18 MR. BITTMAN: Yes.

19 THE COURT: And that you're saying you need it now.

20 MR. BITTMAN: Yes.

21 THE COURT: Rather than in September.

22 MR. BITTMAN: Yes.

23 THE COURT: Do you have any idea -- and if you don't,
24 I can understand, because I do know enough about grand juries
25 to know that you can't always tell how many questions a grand

1 jury may choose to ask or anything like that. Do you have any
2 sense of how long he might be required to appear before the
3 grand jury? Do you have any sense?

4 MR. BITTMAN: I think it would be several hours. Less
5 than -- well, I don't know. It would be several hours.

6 And let me amend one of my answers with regard to the
7 grand jury's wishes as to whether the President actually appear
8 before them. Without revealing too much of what goes on in the
9 grand jury --

10 THE COURT: Certainly.

11 MR. BITTMAN: -- that is their belief now. But we
12 believe that if given a concrete offer by the President, that
13 is, that he, the President, is willing to do this, to a
14 deposition, perhaps in front of the grand jurors in an area
15 outside the grand jury room, perhaps a deposition, obviously
16 under oath, just before attorneys from our office, something
17 like that in the immediate future, we believe that we can gain
18 the -- that we would speak to the grand jury and see if that
19 were acceptable to them.

20 THE COURT: Well, let me just say, I know that even
21 those type of issues could seriously be considered Rule 6(e).
22 But I just wanted to get some sense.

23 That subpoena was issued by the grand jury, is that
24 correct?

25 MR. BITTMAN: Yes.

1 THE COURT: And that was the subpoena that was
2 returnable today.

3 MR. BITTMAN: Yes.

4 THE COURT: At 1:30.

5 MR. BITTMAN: It was actually returnable originally
6 for 9:15, and then I permitted Mr. Kendall till 1:30. I
7 extended it to 1:30.

8 THE COURT: All right. So your position is that the
9 grand jury wishes to hear from him sooner than later.

10 MR. BITTMAN: Oh, yes. They have been kept informed
11 throughout about our invitations and the President's
12 declinations. And Your Honor knows that the grand jury's
13 investigation has proceeded. And it is time to hear from this
14 particular witness, the President.

15 THE COURT: Very well. Thank you.

16 MR. BITTMAN: And we at minimum wish, obviously, a
17 response to whether the President is going to testify and then
18 some concrete terms, because we just can't have this open-ended
19 thing where, okay, in two weeks they may file a motion to quash
20 which is going to further delay the investigation. If a motion
21 to quash is to be filed, we wish to litigate it right away.
22 And, frankly, we would ask Your Honor, if one is filed, for an
23 expedited briefing schedule and expedited hearing, because we
24 want this very, very quickly.

25 THE COURT: Very well. Thank you.

1 Mr. Kendall, I'll be happy to hear anything further
2 that you wish to say on this issue.

3 MR. KENDALL: Thank you, Your Honor.

4 I regret that these somewhat voluminous papers
5 probably hit your desk this afternoon.

6 THE COURT: Believe me, they did.

7 MR. KENDALL: They hit it with a thud, I'm sure.

8 THE COURT: Yes, they did.

9 MR. KENDALL: Your Honor, at Attachment 6, when
10 Mr. Bittman says --

11 THE COURT: Which I have not been able -- I have not
12 read your attachments yet, but I have read your motion.

13 MR. KENDALL: Okay. I would simply direct the Court's
14 attention to that because that was our attempt -- Mr. Bittman
15 and I had conversations and he wanted a specific proposal.
16 This is a specific proposal. It proposes both a time and
17 terms. It's as specific, really, as we can get it.

18 Your Honor, it's simply not the case that this matter
19 has been in discussion since January. It was in discussion in
20 late January to April, and then we heard -- my last letter,
21 which I've appended here, was not responded to. So there was a
22 long three months, plus, pause in this, and then suddenly we
23 got the subpoena. And so it is not --

24 THE COURT: Let me ask you, what about letters from
25 the grand jury? I understand that the grand jury was sending

1 him a written invitation?

2 MR. KENDALL: Well, we received invitations from the
3 Office of Independent Counsel. We never got anything from the
4 grand jury itself.

5 THE COURT: But I mean the invitations from the Office
6 of Independent Counsel indicated, though, that the purpose was
7 for him to appear before the grand jury, wasn't it?

8 MR. KENDALL: They did, Your Honor.

9 THE COURT: And you didn't consider that to be from
10 the grand jury?

11 MR. KENDALL: Well, Your Honor, I did. We responded
12 to each one of those. And we responded -- we had many
13 questions. And this Court is familiar with certain of our
14 concerns about this investigation --

15 THE COURT: Certainly.

16 MR. KENDALL: --- and the way it's progressed. We had,
17 and continue to have, very serious concerns about certain
18 aspects of it. I don't want to have to litigate the
19 constitutional questions, but they are important, they are
20 unresolved. I am reminded when Mr. Bittman -- and, you know, I
21 don't think the Court wants to hear those arguments today. We
22 haven't filed them. But --

23 THE COURT: No. Just the motion for continuance.

24 MR. KENDALL: Every pancake has two sides, Your Honor,
25 as is well known. And we stand ready to make those at an

1 appropriate time. But I think the --

2 THE COURT: But, you see, that's one of the things
3 that caused me to ask you gentlemen to come in here today. I
4 wasn't sure what you meant by give you until such-and-such a
5 time, and I really needed you to come in here and tell me, what
6 do you mean? Do you mean that you will be prepared to respond
7 to the subpoena by that day, or do you mean that "I'm going to
8 give this further thought and then two weeks from now I'm going
9 to tell you what I think?" I need to know precisely what you
10 mean.

11 And I think you have made it clear to me that the
12 motion for continuance that you filed today is not designed to
13 just continue the personal response to the subpoena. In other
14 words, you're not saying, "If you give me two weeks, the
15 President will respond by coming in to see the grand jury or
16 having the grand jury come to see him." And, God knows, I
17 would say to you, recognizing the duties of his office, if it
18 were more convenient, more secure for the grand jury to go to
19 him than for him to come to the grand jury -- and you know what
20 type of atmosphere we have around this building -- then that's
21 one thing. But if what you're saying is "I need two weeks to
22 consider how I'm going to deal with this," then that's another
23 question.

24 MR. KENDALL: Your Honor, again, the letter at
25 Attachment 6 is a very --

1 THE COURT: As I said, I'll read it tonight.

2 MR. KENDALL: Yes. It's a very specific offer. And
3 it's premised -- we've worked this out, really, three times in
4 the past successfully. I think that both our concerns and the
5 Independent Counsel's concerns were met. I think the letter is
6 a good faith attempt to do that again. And I hope that after
7 discussion, we can work out a way -- reserving our questions.
8 I mean, these are negotiations in which both sides want to
9 reserve their option. But three times before, we've had the
10 President testify and that has --

11 THE COURT: Three times before testified with respect
12 to what? This case?

13 MR. KENDALL: With respect to this investigation.
14 This is the Whitewater -- in other words, he gave testimony
15 about various phases of it, Vincent Foster and David Hale and
16 the 1990 gubernatorial campaign.

17 THE COURT: But I don't think this grand jury wants to
18 ask any of those questions.

19 MR. KENDALL: Oh, no. No. I understand that, Your
20 Honor. This is the Lewinsky --

21 THE COURT: Yes.

22 MR. KENDALL: And that's what we're talking about
23 here. My only point is, we've been able to work this out three
24 times in the past. And it's my hope that based upon the
25 proposal we've made in the letter at Tab 6, that we can do it

1 again, and so we won't be coming back to Your Honor.

2 THE COURT: Well, let me just say, apparently -- and
3 I've got to believe this -- with your letter dated July 27th,
4 which was yesterday, they have had an opportunity to read that
5 letter before they got your papers that you filed in the court
6 today around midday. Isn't that true? Every reason to believe
7 they've had an opportunity to read that.

8 MR. KENDALL: That's correct, Your Honor.

9 THE COURT: And even though they have had that
10 opportunity to read it, their stated position on the record is
11 to the contrary of what you're saying -- of what you say your
12 letter says: That they can work it out. In fact, what I heard
13 Mr. Bittman say is that he needs the testimony. You're saying
14 you think you can work it out.

15 MR. KENDALL: Your Honor, we are trying to work it out
16 to give them the testimony.

17 THE COURT: Let me just ask you something, Mr.
18 Bittman. Had you read this letter before you came in here
19 today?

20 MR. BITTMAN: Yes, Your Honor. We responded to it.

21 THE COURT: Oh, you did? And is it here, too?

22 MR. BITTMAN: Yes.

23 THE COURT: Okay.

24 MR. BITTMAN: That's at Attachment 7.

25 THE COURT: I haven't read the attachments, all right?

1 I will read them before I leave here this evening, though,
2 okay?

3 You see, what I -- I mean just applying a little
4 common sense here, if you sent this letter yesterday, they
5 received it, they read it, they responded to it. Still, the
6 subpoena remained outstanding, and the grand jury, who actually
7 was the only body that could authorize that subpoena,
8 apparently was waiting for the subpoena to be responded to
9 today. Then we get your request. And, as I said, you asked me
10 for two weeks and I just didn't quite understand what that two
11 weeks meant. I understand now, based upon your statement to
12 me, what you mean by giving you that additional two weeks, but
13 that does not take into consideration the body which sought the
14 subpoena. You see, that's what concerns me, Mr. Kendall.

15 I'm not saying -- and I want you to understand, I'm
16 not saying that this grand jury has a right to subpoena the
17 President of the United States. I'm sure that they have
18 subpoenaed the President of the United States. And what I am
19 not hearing from you is that "We oppose this subpoena because
20 the grand jury does not have that right." You're saying, "Just
21 give me two weeks to think about something, and then two weeks
22 from now I'll tell you something." And then if two weeks from
23 now you say, "Well, I don't really think they have the right to
24 subpoena the President, and therefore, Your Honor, may I have
25 two more weeks to file a motion to quash the subpoena." I just

1 think that based upon what we all know about this case, the
2 sooner we make a decision, the better.

3 MR. KENDALL: Your Honor, may I respond to that?

4 THE COURT: Surely you may.

5 MR. KENDALL: And I will respond, I hope, in a factual
6 way. I'm not saying that I want a limitless set of extensions.
7 I think that these are very important constitutional questions.
8 If we go to war over them --

9 THE COURT: No question about it, but the question is,
10 do we have to deal with the constitutional issue? Because if
11 we do, let's do that head-on.

12 MR. KENDALL: But, Your Honor, if we go to war over
13 that, that is going to take a lot of time.

14 THE COURT: We're not going to go to war, and we're
15 going to do it the same way the Court of Appeals has you do
16 things. I just find it so interesting. Everybody needs 10, 12
17 days if you are here in the district court, but I understand
18 that those judges on the Court of Appeals give two days or
19 three days. I said, "Why can't I exercise that power? I have
20 a commission too." So, no, we aren't going to be in it
21 forever, okay? All right.

22 I'm being facetious, of course.

23 MR. KENDALL: My only point is, Your Honor, if the
24 object is to get the testimony to the grand jury, I think some
25 statesmanship on both sides is necessary. And I say that about

1 us as well as the Independent Counsel. I think that if we can
2 work this out, we are obligated to do so, because that really
3 is our civic duty. We've done it three times --

4 THE COURT: You all have had a long time, apparently,
5 to do that, Mr. Kendall, if what Mr. Bittman says is correct.
6 Mr. Bittman says that there was a subpoena issued one time.
7 Was that correct?

8 MR. KENDALL: Your Honor, only on the 17th of July. A
9 week ago.

10 THE COURT: Yes. Only the one on July 17th?

11 MR. KENDALL: Yes. I'm sorry. He mentioned -- excuse
12 me, Your Honor. He did mention a subpoena for certain objects
13 that was issued in January.

14 THE COURT: Oh, yes, duces tecum, and that was taken
15 care of. But I understand that there have been about six
16 invitations from the grand jury. So, apparently the President
17 has known for some time that the grand jury wished to speak
18 with him.

19 Now, I don't know, because, God knows, you know, I may
20 have to go up there and see if they have water and a few other
21 things from time to time, but I don't know what goes on before
22 the grand jury as you know. But I would think if somebody had
23 received six letters inviting him to appear before the grand
24 jury, that person -- and I don't mean to be unkind, but
25 certainly his counsel must know that somebody is going to get

1 tired of written invitations and look to other sources. I
2 mean, that's just common sense.

3 MR. KENDALL: Your Honor, we've tried in Tab 1 to give
4 you the complete correspondence, because it states our concerns
5 and the responses. And I think in fairness, that correspond-
6 ence terminated when I sent a letter on April the 17th. I
7 didn't know what the answer was. And a very long time elapsed.

8 My only point here, Your Honor, is that I --

9 THE COURT: Are you saying that there were no
10 invitations from the grand jury since April 17th?

11 MR. KENDALL: April 3rd, in fact, Your Honor, was the
12 last.

13 THE COURT: Was the last letter from the grand jury?

14 MR. KENDALL: Yes. And then all of a sudden, without
15 any warning, we get a subpoena. And that old lawyer's trick,
16 Your Honor, delivering it late Friday night so you can have
17 that date of the week and say, "We served it on July 17th." It
18 came in about 6:00 o'clock. That is what is forcing this
19 issue.

20 In the past, we have been able to resolve this. I
21 don't think it's seemly or statesmanlike, or even very
22 reasonable, to put us under the gun of saying, as they say in
23 their response to the letter of yesterday, "Well, you just
24 commit to this date," and it's an unreasonable date in terms of
25 the President's schedule. We're going to have to file a

1 motion. I don't think we should be in the position of having
2 to file a motion which, if we can resolve the other issues, may
3 be unnecessary.

4 THE COURT: Well, why do you need so much time to
5 resolve the other issues?

6 MR. KENDALL: I'm not sure we do, Your Honor. I'm not
7 sure we do. I'm not sure that we can't do this very speedily.
8 But the scheduling really is a problem.

9 THE COURT: What you're saying is, you have not as yet
10 made the decision whether you are going to challenge the
11 constitutionality of this subpoena.

12 MR. KENDALL: We have made a decision, Your Honor,
13 that we've testified in the past, we believe we can testify at
14 this time. But we don't know what their position is and they
15 may force us to challenge this, and then we'll challenge it.

16 I used the "war" metaphor. We're not going to go to
17 war. But we'll file motions to quash. And my only point is,
18 it is unreasonable -- you wouldn't do this in the normal case,
19 Your Honor. You wouldn't refuse to continue a subpoena for a
20 short time to see if it all was going to be unnecessary. And
21 that's really all we're seeking. And at the end of the day, we
22 may have to file a motion to quash, to bring on the
23 constitutional issue, to preserve the institutional concerns of
24 the Article II entity, person that we represent. It hasn't
25 been necessary in the past; I don't believe it necessarily will

1 be necessary now. But it could be.

2 THE COURT: Well, you say it may not be necessary, the
3 amount of time you're seeking, but you still seek that time.

4 MR. KENDALL: I do, Your Honor.

5 THE COURT: All right. Anything else?

6 MR. KENDALL: The only thing I would say is, in
7 reference to Mr. Bittman's statement about the President's
8 schedule, it is true, he does have a vacation planned for late
9 August. It's a well-deserved vacation. It, unfortunately, is
10 right on the eve of his Russia trip and Ireland trip. That's a
11 trip from August 31 to September the 6th. Both those countries
12 are very important. A lot of that vacation is going to be
13 absorbed with preparing for the Russia trip.

14 Again, we are trying -- we've given them the date in
15 September. We are aware from other parties who have been
16 subpoenaed that the grand jury's work is going on. There are
17 many other legal questions which are in the process of being
18 resolved. We really don't think that this date will delay the
19 grand jury's work, and we want to make it possible, if we can,
20 to give the President's testimony as soon as possible.

21 THE COURT: Well, let me just say this. You know,
22 even I don't know what the grand jury is doing. And I'm
23 certain that Mr. Bittman has some sense because he knows what
24 has been presented to the grand jury and what he wishes to
25 present to the grand jury. But I haven't the foggiest notion

1 of what they have presented or what they wish to present. I
2 learn most of what I know about that grand jury the same way
3 most citizens in this city do, and we don't know how accurate
4 that is, but that's from the local press.

5 Now, what concerns me is this: This case is unlike
6 the Jones case. It truly is unlike the Jones case. And even
7 though it is quite unlike the Jones case, we know what the
8 Supreme Court felt about even a civil action of the type that
9 we have there. Here, we have a criminal investigation going
10 on. Here, we know from just reading the press that perhaps
11 witnesses who have been called in before this grand jury have
12 been testifying about certain conduct. I don't know what that
13 grand jury thinks, but it perhaps thinks that "We citizens have
14 been brought from our regular responsibilities and asked to
15 listen to certain evidence, and we have decided, based upon
16 what we have heard, that we need to hear from the President."

17 Now, maybe they don't have any legal right to hear
18 from the President. Maybe that is an issue we will have to
19 resolve before this subpoena can be honored. But what we need
20 to do, I think, is to move forward, and move forward
21 expeditiously.

22 Apparently, the President has been given, if you'll
23 excuse this slang, a heads-up by the number of invitations.
24 Did I determine that those invitations were in writing?

25 MR. KENDALL: Some of them were, Your Honor. They are

1 reflected, I think, in the correspondence in Tab 1.

2 THE COURT: As I said, I'll read this. But some of
3 it -- at any rate, he's received six invitations. And
4 apparently the grand jury has determined that "Although we
5 would like to honor your position as our President by simply
6 asking you to appear voluntarily, we have now reached the point
7 where we believe that you will not honor us with your presence
8 voluntarily, but we do believe that in our search for the
9 truth, we need to hear from you." And now, for him to say,
10 "Give me two weeks to think whether I'm going to challenge this
11 legally or what I'm going to do, give me two weeks to see if I
12 can work this out with the prosecutor, give me two weeks to see
13 whatever I need to do," but by the time that two weeks is up,
14 Mr. Kendall, you're saying to me he will -- I don't know
15 whether he's going to the Cape this year or not, but I know
16 that's where he generally goes. Whether he will be at the Cape
17 by the time the two weeks is up. And, clearly, I've been told
18 that after leaving the Cape, he'll be going to Russia. So,
19 when, if ever, unless somebody directs him, will he be willing
20 to respond to this grand jury? Or if he isn't willing to
21 respond to the grand jury, tell me.

22 MR. KENDALL: Your Honor, it's a fair question.

23 THE COURT: Tell me. And then we will do what we have
24 to do.

25 MR. KENDALL: We've given two dates. I think that's a

1 very fair question. You'll see in the letter at Tab 6 --

2 THE COURT: The July 27th letter?

3 MR. KENDALL: Exactly.

4 THE COURT: All right.

5 MR. KENDALL: We have said, because of the Russia
6 trip, because of the vacation and other travel. And, again,
7 it's very easy to sit there, whether you're reading a
8 newspaper, you're in the Office of Independent Counsel, and
9 say, well, that trip's not necessary, that's just a
10 fund-raising trip, and that's a political trip, and, look, I
11 don't think Ireland is such an important country. Those
12 concerns are the President's, and the President's alone, to
13 balance. And courts -- I mean, again, the teaching of Clinton
14 v. Jones, I think, is that a court must try to accommodate and
15 give deference to the President's schedule.

16 THE COURT: That's true. And as I said, I understand
17 that very, very clearly, because we know that as President of
18 these United States, this gentleman has concerns that none of
19 us know about. We know that there are issues of state that
20 none of us know about. We know all of that. But I also know
21 this: If he can vacation for a couple of weeks, he can appear
22 before a grand jury, too, you know.

23 And God knows, he needs a vacation. I know that. I
24 know he needs a vacation. And I don't know that the grand jury
25 will -- he doesn't know how -- the grand jury may just want to

1 see him. I don't know. They may not have any questions at
2 all.

3 MR. KENDALL: We did try to make a very specific
4 offer, including a date that would be consonant with his
5 schedule.

6 THE COURT: But that's sometime in September.

7 MR. KENDALL: It is.

8 THE COURT: Well, as I said, you see, I don't know the
9 interest of the grand jury, either. But one thing is for sure:
10 The grand jury has apparently attempted, even though you've
11 maintained that because there was no further response to some
12 letter you wrote in April, that, therefore, he could think that
13 maybe they didn't want him any more.

14 MR. KENDALL: Your Honor, I would like to distinguish,
15 if I could, between concerns. We, obviously, would like to
16 help the grand jury in its endeavors. The Office of
17 Independent Counsel we have our differences with about a number
18 of things. They are set forth in the letter. Those concerns
19 have not been responded to. We are willing to forgo some of
20 those or litigate them in other forums. We really did try,
21 however, to get a good faith offer that was specific in terms
22 of place, way of taking testimony, issues -- and leaks are one
23 of the things that we are concerned about. But we believe that
24 there can be safeguards. This is not an impossible task. And
25 time. And the time is really very critical. But we have tried

1 to put that all in a very specific proposal for the Independent
2 Counsel and for the Court.

3 THE COURT: All right. Thank you very much.

4 MR. KENDALL: Thank you, Your Honor.

5 THE COURT: Mr. Bittman, I'll hear from you finally.

6 MR. BITTMAN: Thank you. I'll be brief. Robert
7 Bittman on behalf of the United States.

8 Your Honor, in all respect, I think saying that we are
9 being unreasonable by issuing a grand jury subpoena with the
10 grand jury's approval is a little -- and that we're not willing
11 to accommodate or even give a little bit with regard to the
12 President's schedule, we are, we have been. I think that that
13 argument would have a lot more merit had there not been six
14 invitations.

15 We've tried to get his testimony since January. We've
16 tried. Since January 27th, we have tried. We've invited him.
17 And we made clear in all those invitations that we will
18 accommodate the President's schedule. And now, for the
19 President to -- and then after six invitations, you know, we in
20 the grand jury decide to issue a subpoena to the President
21 because that's within our power. You know, we tried to
22 accommodate him, we've tried all means necessary to avoid any
23 constitutional confrontation or something like that, but he
24 declined the invitation. What are we left to do? And we have
25 -- back then, when we extended these invitations, we have a lot

1 of room to negotiate in terms of when and how and where and
2 that kind of stuff. Well, now we're at the end of the
3 investigation, or near the end of the investigation, we decide,
4 with the grand jury's approval, to issue a subpoena to the
5 President. We don't have many options any more.

6 And so for them to come in here and say, "Oh, we want
7 them to be more reasonable," we were reasonable back then. And
8 they were the ones that said, "No, we're not going to do it.
9 We're not going to agree to this." So I think it is
10 disingenuous, with all respect.

11 I did notify Mr. Kendall last weekend -- and I might
12 also say, if they were really serious about trying to work
13 something out -- and Mr. Kendall did put forward a very
14 specific date. I agree with that. And that's in his
15 correspondence. But the date simply is not acceptable. That's
16 the bottom line. It's unacceptable. We told him it was
17 unacceptable.

18 THE COURT: That's the September date?

19 MR. BITTMAN: That's the September date. That is
20 unacceptable. And we have the power, we, with the grand jury,
21 have the power to compel the President. That's what we've
22 decided to do. We didn't want to do that. That's why we
23 issued the six invitations. But they put us in a box. We had
24 to do it because they weren't going to agree anyway. Now, we
25 have a limited opportunity in terms of time.

1 I notified Mr. Kendall that if they really wanted to
2 work out a date, an acceptable date with us, that we would be
3 available all weekend. Apparently Mr. Kendall -- I read that
4 Mr. Kendall was not available over the weekend. But we
5 responded within hours of his letter to me, and we said we're
6 available to work this out, to work out an acceptable date.
7 They didn't provide us with an acceptable date. It's that
8 simple.

9 We still are willing to work out an acceptable date,
10 but we're not going to wait two weeks for it. We have to move
11 this along.

12 THE COURT: Well, I think Mr. Kendall is asking for a
13 little more than two weeks, isn't he?

14 MR. BITTMAN: He is, because --

15 THE COURT: You see, that's why I really had to have
16 you all in here today, because I wanted to be certain of what
17 you meant. You could read Mr. Kendall's motion to maybe
18 suggest that, well, we'll be ready to go on that date, and I
19 said and you could also read it to mean that you won't be ready
20 to go, "but I'll be ready to tell you where I want to go two
21 weeks from now."

22 And I certainly have a duty to the President, but I
23 also have a duty to the grand jury. And here, this third
24 branch stands behind the first and the second branches, but,
25 you know, I do have a duty myself.

1 So, anything else you want to say? I'll have to take
2 this matter under advisement, but let me just say, I'm in a
3 better position to take it under advisement, having had you
4 come today, than I was just based on the papers alone.

5 MR. BITTMAN: Nothing else from me. Thank you, Your
6 Honor.

7 THE COURT: Anything else from you, Mr. Kendall?

8 MR. KENDALL: Thank you, Your Honor.

9 THE COURT: Okay. Well, thank you very much.

10 Let me just say, what I hope to do is call you first
11 thing in the morning and tell you -- I hope to be able to call
12 you first thing in the morning and tell you to come down and
13 pick up my decision or pick up an order or whatever the case
14 may be relative to today's hearing. Okay? I really hope to
15 be able to do it. And if you haven't heard from me by 11
16 o'clock -- well, let me just say this. If you haven't heard
17 from me by 11 o'clock -- no, that isn't what I want to say.

18 If you have not received a telephone call from me
19 before 11 o'clock, I will try to do a conference call at
20 11 o'clock. That's what I want to say. Okay? Thank you very
21 much.

22 (Proceedings concluded at 5:20 p.m.)

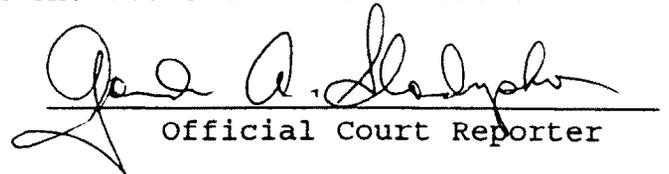
23

24

25

CERTIFICATE OF REPORTER

I certify that the foregoing is a correct transcription from the record of proceedings in the above-entitled matter.


Official Court Reporter

Tab 54

FEDERAL BUREAU OF INVESTIGATION
Receipt for Property Received/Returned/Released/Seized

Page 1 of 1

On (date) 7/29/98

Time: 7:45 PM

item(s) listed below were:

- Received From
- Returned To
- Released To
- Seized

(Name) Law Offices of Plato Cacheris

(Street Address) 1100 Conn. Ave., Suite 730

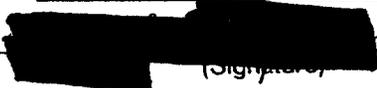
(City) Washington, D.C.

Description of Item(s):

- ① 1 stuffed animal from black dog
- ② Book: Leaves of Grass w/ paper cover
- ③ Page from filofax (1996 & 1997) w/ dates circled on it
- ④ GAP dress, size 12, dark blue
- ⑤ Brown, marble bear sculpture
- ⑥ Rockettes Christmas blanket (1995), red & white
- ⑦ Dark sunglasses (TAIWAN written on inside)
- ⑧ Wooden box, circular in shape, redish
- ⑨ 4 microcassetts:
 - 1) "Dec 96" on it
 - 2) "Sept. 96" on it
 - 3) "May 96 2 mess." on it
 - 4) "April 96" on it
- ⑩ White canvas bag w/ a black dog on it.

END

Received by:



(Signature)

Received from

Monica L.

(Signature)

Tab 55



Office of the Independent Counsel

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

July 31, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

I telephoned you twice this morning but was unable to reach you. Investigative demands require that President Clinton provide this Office as soon as possible with a blood sample to be taken under our supervision. [REDACTED]

[REDACTED]. I assure you this information will be kept strictly confidential and will be restricted to a handful of persons on a need-to-know basis only.

Your prompt response to these requests will be greatly appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert J. Bittman".

Robert J. Bittman
Deputy Independent Counsel

2412



Office of the Independent Counsel

July 31, 1998

Received this 31st day of July, 1998, one
double-enveloped package addressed to David
Kendall, Williams & Connolly, 725 12th
Street, Northwest, Washington, D.C. 20005

7/31/98 3:20pm
Date and Time

N. S. [Signature]
Signature

Tab 56

2415

LAW OFFICES

WILLIAMS & CONNOLLY

725 TWELFTH STREET, N.W.

WASHINGTON, D. C. 20005-5901

(202) 434-5000

FAX (202) 434-5029

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

DAVID E. KENDALL
(202) 434-5145

July 31, 1998

CONFIDENTIAL

Robert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

By Hand

Dear Bob:

I received your July 31 letter which refers to "[i]nvestigative demands." As you must surely be aware, the cases require a heightened standard of probable cause for bodily intrusions. See, e.g., Schmerber v. California, 384 U.S. 757, 769 (1966); Winston v. Lee, 470 U.S. 753, 759 (1985); In re Grand Jury Proceedings (Suleski), 816 F. Supp. 1196, 1204-06 (W.D. Ky. 1196). Since the request you make is addressed to the President of the United States, I believe that also applicable to this request are the considerations identified in Clinton v. Jones, ___ U.S. ___, 117 S.Ct. 1636, 1650-1651 (1997), that mandate a "high respect that is owed to the office of the Chief Executive . . . [which should] inform the conduct of the entire proceeding." Accordingly, I ask that you inform me of the precise factual basis for your request.

I have another concern and another request. I will not rehearse the history of grand jury leaks in this investigation or the orders that Chief Judge Johnson has entered. While the OIC has retained outside counsel to appeal portions of the district court orders which afforded us discovery against the OIC and while an administrative stay from the Court of Appeals is now in effect, the OIC has not appealed the underlying findings which caused the Chief Judge to enter her orders. In just the last few days, there have been numerous leaks to the news media of reports about a dress of Ms. Lewinsky's which is allegedly stained in

CONFIDENTIAL
OFFICE OF THE
INDEPENDENT COUNSEL

WILLIAMS & CONNOLLY

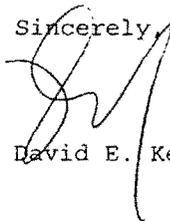
Robert J. Bittman, Esq.
July 31, 1998
Page 2

some way. As to these latter leaks, I do not at the present time have information sufficient to say who may be guilty of any improper disclosures, but unfortunately such leaks appear to be a way of life in this investigation. I fear that, if we provide the sample you have requested, false information of any tests that are conducted will be leaked. In its papers in the leaks litigation, the OIC has often adverted to "false" leaks. The only way we can be protected against such a phenomenon is to be made aware of any test results which are conducted, so we will be in a position to respond to false leaks.

If you believe either of these disclosures would be protected by Rule 6(e), we would be willing to stipulate to a motion to the Court for a Rule 6(e) order allowing the release of information to us, and we would undertake not to disclose it further, except on the terms specified in the order.

I would like to discuss these matters with you further and will give you a call after you have received this letter.

Sincerely,



David E. Kendall

DEK/bb

Tab 57

**Office of the Independent Counsel**

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

July 31, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

This responds to your letter of today, which was delivered to me at 5:35 p.m.

I assure you that we have substantial factual and legal predication for our request of the President. We are mindful of the legal requirements of our request, and we are certain that the request is lawful and would be upheld by a reviewing court. We make this request, as we have others, respectful of the dignity of the Office of the President. Because of the President's pledge to cooperate with this investigation and out of respect for the Presidency, we have not issued a subpoena for this sample. We do not wish to litigate this matter, and we wish no embarrassment to the President. Yet, we have substantial predication for our request, and we must do our job.

You also refer to the dissemination of information in the media. As confirmed by Messrs. Stein and Cacheris, this Office is not the source -- either directly or indirectly -- of the information. That being said, we are sensitive to your desires, consistent with our abiding aim, to insure complete confidentiality. We have -- we believe -- powerful predication for our request of the President, and that representation, which reflects our considered professional judgement, should suffice. If you disagree, then the prudent and wise course may be to proceed under the aegis of the Chief Judge. We would set forth our predication, which we believe is powerful, before the Chief Judge. This would assure you the independent review of an Article III judge, and thereby further insure that the dignitary interests of the President are scrupulously protected. The Chief Judge would also, under our proposed approach, then be in a position to consider any protective order (or evaluate a motion to quash) that you might see fit to request.

David E. Kendall, Esq.
July 31, 1998
Page two

We are not in a position at this early juncture to agree to a release of information subsequent to further examination; such a release to you might raise serious questions of law, as you recognize. Here again, we could go before Chief Judge Johnson for appropriate direction to protect all relevant interests.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Bittman". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Robert J. Bittman
Deputy Independent Counsel

Tab 58

2423

LAW OFFICES

WILLIAMS & CONNOLLY

725 TWELFTH STREET, N.W.

WASHINGTON, D. C. 20005-5901

(202) 434-5000

FAX (202) 434-5029

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

DAVID E. KENDALL
(202) 434-5145

August 3, 1998

CONFIDENTIAL
WRITTEN PURSUANT TO SECRECY PROVISIONS OF RULE 6(e),
FEDERAL RULES OF CRIMINAL PROCEDURE
GRAND JURY MATERIAL

Robert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

BY HAND--TO BE OPENED BY MR. BITTMAN ONLY

Dear Bob:

This letter is written after receiving your second letter dated July 31, 1998, and after our telephone conversation this morning. We agree to provide the blood specimen you have requested (today, if possible), pursuant to the following conditions:

- (1) This test, any analysis, our written correspondence, and our oral communications on this issue are all to be treated as highly confidential, subject to the full protections of Rule 6(e), Federal Rules of Criminal Procedure. Both the OIC and we will take the utmost precautions to preserve the confidentiality of this matter.
- (2) The sample will be drawn by the White House physician, Dr. Connie Mariano, at the White House, in the presence of two representatives of the OIC, under medical procedures acceptable to the OIC. The sample will be immediately furnished to the OIC.
- (3) You will execute an affidavit today setting forth your predication evidence for requesting this test, and you will preserve this affidavit in a secure place. You will set forth in the affidavit the evidence you would have presented to Chief Judge Johnson, as represented in your second letter of July 31, 1998.

WILLIAMS & CONNOLLY

Robert J. Bittman, Esq.
August 3, 1998
Page 2

(4) You will instruct the laboratory that does any analysis related to the specimen we furnish to preserve enough of the item being tested (e.g., any dress of Ms. Lewinsky's) to make possible a later, outside, comparative test of the same type, if appropriate.

I will look forward to receiving a written response to this letter, and we will speak later in the day concerning logistics.

Sincerely,

A handwritten signature in black ink, appearing to read 'DEK', with a long vertical stroke extending downwards from the end of the signature.

David E. Kendall

DEK/bb

Tab 59

2427



Office of the Independent Counsel

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

August 3, 1998

HAND DELIVERED

David E. Kendall, Esq.
Williams & Connolly
725 Twelfth Street, N.W.
Washington, D.C. 20005

Re: William Jefferson Clinton

Dear David:

This responds to your letter of today regarding your agreement to permit a blood sample to be taken from the President this evening at 10:00 p.m.

(1) We will treat this test, any analysis, our written correspondence, and our oral communications on this matter as highly confidential, subject to the full protections of Rule 6(e).

(2) We agree to permit Dr. Mariano to draw the sample from the President in the presence of two representatives from this Office. Dr. Mariano should use a "purple-top" tube, which she will then turn over immediately to the representatives from this Office. I, Robert James Bittman [REDACTED] and [REDACTED] will represent the OIC.

(3) I agree to execute a declaration setting forth the predication for requesting this test. This declaration will then be preserved in a secure place at the OIC.

(4) I have requested that the FBI Laboratory preserve as much of the remaining specimen as possible so as to make possible a later, comparative test, if appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read "Robt J. Bittman".

Robert J. Bittman
Deputy Independent Counsel

Tab 60

2431

7-1 (Rev. 2-21-91)



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Date: August 3, 1998

To: Mr. Kenneth W. Starr
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

FBI File No. 29D-OIC-LR-35063

Lab No. 980730002 S BO

Reference: Communication dated July 30, 1998

Your No. 29D-OIC-LR-35063

Re: MOZARK;
MC 106

Specimens received: July 30, 1998

Specimens:

Q3243 Navy blue dress

ITEMS NOT EXAMINED

NE1 Hanger

NE2 Plastic bag

This report contains the results of the requested serological examinations.

Specimen Q3243 and samples removed from specimen Q3243 are being preserved for possible future DNA analysis. In order to conduct meaningful DNA analysis, known blood samples must be submitted from the victim, suspect or other individuals believed to have contributed body fluids to specimen Q3243. Each known blood sample should be collected in one (1) lavender-top blood

vial containing the preservative EDTA, and stored in a refrigerator until submission to the FBI Laboratory.

The evidence and the samples removed from the evidence will be retained in the FBI Laboratory until they are retrieved by a representative from your office.

2433



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Report of Examination

Examiner Name:



Date: 08/03/98

Unit: DNA Analysis 1

Phone No.: 202-324-4409

FBI File No.: 29D-OIC-LR-35063

Lab No.: 980730002 S BO

Results of Examinations:

Semen was identified on specimen Q3243.

No other serological examinations were conducted.

Tab 61

FEDERAL BUREAU OF INVESTIGATION

Date of transcription August 3, 1998

On this date, Supervisory Special Agent (SSA) [REDACTED] was present in the Map Room of the White House, Washington D.C. with Robert J. Bittman, Deputy Independent Counsel, Eleanor Maricino, M.D., White House Physician, David Kendall, Attorney and William Jefferson Clinton, President. At approximately 10:10 pm, SSA [REDACTED] observed Dr. Maricino draw blood by venous puncture from President Clinton's right arm, filling one purple top tube (approximately 4ml). She capped the tube and transferred it to SSA [REDACTED] who labeled the tube with the name "William Clinton", the date and SSA [REDACTED] initials. The tube was placed in a clean disposable test tube and sealed with evidence tape. SSA [REDACTED] promptly returned to the FBI Laboratory, Washington D.C. where at 10:30, the tube of blood was delivered to DNA Analysis Unit I technician, [REDACTED], for further processing according to standard practice. This sample will be maintained in the custody of the FBI Laboratory for the duration of the testing process.

Investigation on August 3, 1998 Map Room, White House,

File # 29D-OIC-LR-35063

y SSA [REDACTED] Date dictated August 3, 1998

Tab 62



Office of the Deputy Attorney General
Washington, D.C. 20530

August 3, 1998

Honorable Kenneth Starr
Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Mr. Starr:

In your July 22, 1998, letter, you asked whether the Secret Service would, at this time, make witnesses available to your office consistent with the past practice of proffers, interviews, and depositions. My understanding is that this request will be the subject today of a meeting between you and Director Merletti, which will be attended by Jonathan Schwartz and Gary Grindler from the Department of Justice. In advance of that meeting, however, I would offer the following thoughts on behalf of the Department and the Secret Service regarding a number of statements in your letter, in order to provide a more complete and accurate backdrop for this afternoon's meeting.

Your letter suggests that you undertook the proffer-interview-deposition process at "significant cost" to your investigation. I do not believe this is an accurate reflection of the facts. In the face of our decision several months ago to assert a protective function privilege, the Department and your office sought to find a mutually acceptable way for your office to obtain information from Secret Service personnel that did not fall within this asserted privilege. Your office initially declined our suggestion to do interviews in advance of depositions. The deposition-only format proved to be problematic, however, due to its formality and due to confusion over the scope of the privilege (admittedly caused, in part, by the Department's periodic re-evaluation and narrowing of its scope). As a result, we renewed our suggestion that your office first interview Secret Service personnel. Your office ultimately agreed to try the interview process, when preceded by proffers of non-privileged information by Department attorneys, so that your attorneys would have an overview of the officers' information before interviews began.

The proffer-interview-deposition format clearly proved to be a more mutually beneficial (not to mention much less contentious) method by which your office obtained non-privileged information from Secret Service personnel, as your attorneys confirmed several times to us. Through proffers and interviews, your office much more quickly determined the limited number

08/03/98 MON 14:55 FAX

Honorable Kenneth Starr

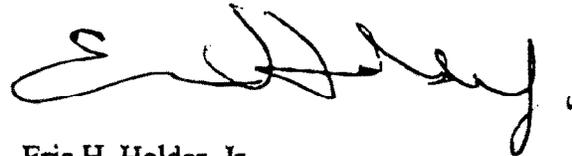
Page 2

of officers from whom you needed to obtain sworn deposition testimony. The subsequent depositions then proceeded much more smoothly. While I am not privy to the details of your investigation, it would appear that your investigation was aided by some of the non-privileged information that your attorneys received. Under these circumstances, the assertion that altering the normal procedures by which Secret Service witnesses were questioned somehow hindered your investigation appears inconsistent with the facts as we know them.

I believe that some in your office have undervalued the very real and negative impact that the broad summoning of protective personnel and the broad scope of the questioning has had on the Secret Service. At least 30 officers were interviewed, some of them two or even three times, and many officers who apparently lacked first-hand knowledge relevant to your inquiry were questioned about mere rumors they may have heard. Regardless of our record in convincing federal judges to recognize a new protective function privilege, there is no question that each and every one of the current Secret Service employees whom your office has questioned feels that he or she has violated a code of confidentiality and trust. As a result, the Secret Service sincerely believes that its morale and its ability to do its mission have been adversely affected.

Finally, please allow me to reiterate that the Departments of Justice and Treasury reached the very difficult decision to seek judicial recognition of a protective function privilege for entirely non-partisan purposes, and only after an exhaustive review of the complex legal and policy issues at stake. As prosecutors, the Attorney General and I have been extremely mindful of the effects that our decision to seek the privilege might have had on your investigation (not to mention future investigations by Department attorneys). Nonetheless, we reached the difficult determination that the potential risk to the life of this and future presidents occasioned by the compelled testimony of Secret Service personnel required us to interpose the asserted protective function privilege with respect to information falling within its scope. We trust that you continue to have confidence in the bona fides of this decision.

Sincerely yours,



Eric H. Holder, Jr.
Deputy Attorney General

08/03/98 MON 14:54 FAX



U. S. Department of Justice
Office of the Deputy Attorney General

The Deputy Attorney General

Washington, D.C. 20530

FACSIMILE TRANSMISSION COVER SHEET

DATE: August 3, 1998

TO:

Honorable Kenneth Starr
Independent Counsel
Office of the Independent
Counsel

OFFICE

PHONE #: (202) 514-8688

FACSIMILE

PHONE #: (202) 514-8802

FROM: Eric H. Holder, Jr.
Deputy Attorney General

OFFICE

PHONE #: 202-514-2101

FACSIMILE

PHONE #: 202-514-0467

COVER PLUS 2 PAGES

REMARKS:

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Tab 63

2446



OFFICE OF INDEPENDENT COUNSEL

DONALD C. SMALTZ

In re Secretary of Agriculture Espy

P.O. Box 26356
103 Oronoco Street, Suite 200
Alexandria, VA 22313
(703) 706-0010
(FAX) 706-0076

August 6, 1998

The Honorable Janet Reno
Attorney General of the United States
United States Department of Justice
10th Street and Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Dear General Reno:

On December 5, 1997, I wrote to you concerning a series of statements to the press, apparently emanating from the Department of Justice, that disparaged certain independent counsel offices, the independent counsels as individuals, and the Special Division of the U.S. Court of Appeals for the D.C. Circuit that appoints independent counsels. A copy of my letter is attached. You responded by letter on January 20, 1998, deploring the alleged comments. You further stated that the matter had been referred to the Department's Office of Professional Responsibility for "whatever action it deems appropriate." A copy of your letter is attached.

I have now received a letter dated July 15, 1998, from Richard Rogers of your Office of Professional Responsibility, reporting the results of his investigation. A copy of this letter is also attached. I must say that I find this letter to be deeply disturbing, first in what it says, but even more so in what it does not say.

Mr. Rogers' legalistic response reads more as a brief defending departmental action on narrow legal grounds than as a serious attempt to look at the problem. He concludes that, technically, the press statements attributed to departmental officials did not violate Rule 3.6 of the ABA's Model Rules of Professional Responsibility because, in his view, they were too general to influence a pending case and, under his interpretation, the rule governs only the behavior of attorneys who have directly participated in the investigation.

The Honorable Janet Reno
Attorney General of the United States
August 6, 1998
Page 2

These distinctions are, at best, dubious. While the statements might not have disparaged any specific witness, item of evidence, or prosecution theory, they did directly disparage the prosecutor in high-profile pending cases (at least one before the jury as the remarks became public), and thus could easily have had an impact on the outcome. Moreover, while it is questionable that Rule 3.6 would condone one lawyer for the United States disparaging the work of another lawyer also appearing on behalf of the United States, the fact is that the Blackley matter, which was in trial when these remarks surfaced, was originally investigated by the Department.

My December 5 letter also pointed out that some of the statements attributed to departmental officials, that disparaged Judge Sentelle and the Special Division, might be in violation of ABA Model Rule 8.2, forbidding false statements concerning the qualifications or integrity of a judge. Mr. Rogers does not even bother to comment on this point.

However, the truly disturbing aspect of Mr. Rogers' letter is what he does not say. He does not pretend to have even considered the issues raised in my letter beyond searching for technical grounds that would take them outside of the ABA Model Rules. Rather, he eschews all further consideration of the problem: "Because Rule 3.6 is inapplicable in this case and no other applicable rule appears to prohibit the reported comments, we must conclude that no further inquiry into them by this Office is justified."

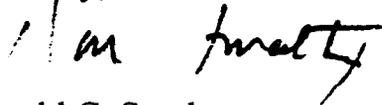
Your letter of January 20 stated that "[i]f these alleged comments were made to the press, I, like you, deplore them and find them wholly inappropriate." Either Mr. Rogers did not read your letter, or he is getting conflicting orders from elsewhere. Mr. Rogers takes the position that he need make no inquiry at all regarding the numerous press statements that we brought to your attention so long as he can construct a defense for them under the ethical rules. If the comments were, as both you and I have concluded, deplorable and inappropriate, then the Department should not consider them unworthy of inquiry simply because they can be threaded through a technical reading of the ABA Rules

The Honorable Janet Reno
Attorney General of the United States
August 6, 1998
Page 3

Apart from the ABA rules, these comments, in my view, violate both the letter and the spirit of Departmental policies and regulations dealing with the media, as contained in Chapter 20, "Publicity and Media Regulations," *Ethics and Professional Responsibility*, Department of Justice, November 1995. The issue of the impropriety of the regulations is a question that should not be ignored by the Office of Professional Responsibility and needs, I respectfully suggest, to be addressed.

Because I still do not have a response, I must ask again, as I did in my December 5 letter, that you direct the officials who work for you to temper their public remarks, and to present any concerns or criticisms to the independent counsel offices so that problems can be addressed directly. The clear message of Mr. Rogers' letter is that "deplorable" and "inappropriate" statements by departmental officers and employees are condoned, if not encouraged, so long as they are technically defensible under the ethical rules. I hope that this message is not an accurate one but, if it is, I would appreciate being so informed. I also request whether, in the Department's view, the referenced statements fall within or without the proscriptions of Chapter 20, referenced above.

Sincerely,



Donald C. Smaltz
Independent Counsel

Enclosures

Copies: Richard M. Rogers, Deputy Counsel (w/encl.)
The Honorable Kenneth W. Starr (w/encl.)
The Honorable David M. Barrett (w/encl.)
The Honorable Carol Elder Bruce (w/encl.)
The Honorable Ralph I. Lancaster, Jr. (w/encl.)

2450

Tab 64

2452



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: Mr. Kenneth W. Starr
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

Date: August 6, 1998

FBI File No. 29D-OIC-LR-35063

Lab No. 980730002 S BO
980803100 S BO

Reference: Communication dated July 30, 1998 and evidence
submitted August 3, 1998

Your No. 29D-OIC-LR-35063

Re: MOZARK;
MC 106

Specimens received: July 30, 1998 and August 3, 1998

Specimens: Received July 30, 1998 (under cover of FBI Laboratory
number 980730002 S BO):

Q3243 Navy blue dress

ITEMS NOT EXAMINED

NE1 Hanger

NE2 Plastic bag

Specimen received August 3, 1998 (under cover of FBI Laboratory
number 980803100 S BO):

K39 Liquid blood sample from WILLIAM CLINTON

This report supplements an FBI Laboratory report dated August 3, 1998 and contains the results of additional serological and DNA-PCR examinations. DNA-RFLP examinations are continuing and you will be advised of the results of those examinations and the disposition of the evidence in a separate report.



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Report of Examination

Examiner Name: [REDACTED] Date: 08/06/98
 Unit: DNA Analysis 1 Phone No.: 202-324-4409
 FBI File No.: 29D-OIC-LR-35063 Lab No.: 980730002 S BO
 980803100 S BO

Results of Examinations:

Specimen Q3243 was examined for the presence of blood; however, none was found.

Polymarker (PM), DQA1, and D1S80 types as listed below were detected for the following specimens:

<u>SPECIMEN</u>	<u>LDLR</u>	<u>GYPA</u>	<u>HBGG</u>	<u>D7S8</u>	<u>Gc</u>	<u>DQA1</u>	<u>D1S80</u>
Q3243-1	BB	BB	AB	AB	AC	1.1, 1.2	24, 24
Q3243-2	BB	BB	AB	AB	AC	1.1, 1.2	24, 24
K39	BB	BB	AB	AB	AC	1.1, 1.2	24, 24

Based on the PM, DQA1, and D1S80 typing results, the source of specimen K39 is included as a potential contributor of the DNA obtained from specimens Q3243-1 and Q3243-2 (two semen stains removed from specimen Q3243). The probability of selecting an unrelated individual at random having the same PM, DQA1 and D1S80 types as detected in the questioned specimens is approximately 1 in 390,000 in the Black population, 1 in 43,000 in the Caucasian population, 1 in 39,000 in the Southeastern Hispanic population, and 1 in 220,000 in the Southwestern Hispanic population.

Based on the amelogenin typing results, male DNA was detected in the DNA obtained from specimens Q3243-1, Q3243-2 and K39.

2455

Tab 65

2456

NEWS - 8/7/98 WATIMES A1
 /98 Wash. Times (D.C.) A1
 - 8 WL 3454933
 The Washington Times
 Copyright 1998

Friday, August 7, 1998

A

Richardson didn't have post to offer Evidence doesn't support his statments on
 Lewinsky
 Bill Sammon
 THE WASHINGTON TIMES

U.N. Ambassador Bill Richardson, contrary to what he told Congress last month, did not have an opening on his staff when he offered to hire Monica Lewinsky last October, according to informed sources and documents obtained by The Washington Times.

Mr. Richardson, who was recently confirmed as President Clinton's new energy secretary, planned to create a new position to accommodate Miss Lewinsky's desire for employment in New York City, said sources at the United Nations, the State Department and on Capitol Hill. He panicked when the scandal broke in January and scrambled to find a slot that he could claim had existed long before he interviewed Miss Lewinsky, the sources said.

Despite Mr. Richardson's repeated, sworn assertions, he did not take the position until after independent counsel Kenneth W. Starr served him with a subpoena demanding all documents relating to the job offer. Mr. Starr is trying to determine whether the offer was aimed at distancing Miss Lewinsky and keeping her quiet about her relationship with Mr. Clinton.

"I've heard all this speculation before," said Mr. Richardson's chief of staff, Rebecca Cooper. "Luckily, what allows me to go to sleep at night is knowing that none of this is true."

Mr. Richardson did not return telephone calls, but during his confirmation hearing on July 22, he told the Senate panel that the job he offered to Miss Lewinsky was a low-level, \$30,000 position in

New York. After she turned it down, the job was given to U.N. employee Paul Aronsohn, a senior staffer who has handled such high-level issues as nuclear disarmament and the U.N. arrears controversy.

Mr. Aronsohn, who has worked in the U.N.'s political section for four years, is paid substantially more than \$30,000 and was transferred to Washington weeks before Mr. Richardson's testimony, Miss Cooper said.

Explained his spokesman, Calvin Mitchell: "The ambassador is not a personnel officer. He is not to sit in front of the Senate and answer questions off people's personnel files. And he described, in his mind, what the job was to him and how it was perceived and how it was going to function."

Nonetheless, the discrepancies raise serious questions about the veracity of sworn testimony by Mr. Richardson, who until now has been a peripheral figure in the Lewinsky scandal. They also suggest that Mr. Richardson took steps to conceal special treatment he afforded a

man who yesterday began telling a grand jury about her relationship with the president.

AN 'EXISTING SLOT'?

Monica Lewinsky was not a household name when Mr. Richardson was asked by White House Deputy Chief of Staff John Podesta to interview "this person" in October, the ambassador testified.

"He did not even know her name when he asked me to interview her," Mr. Richardson testified. "I did not know her name."

The request originated with Betty Currie, the president's personal secretary, who relayed it to Mr. Richardson through his friend, Mr. Podesta, according to testimony by Mr. Richardson before the Energy and Natural Resources Committee.

But Mr. Richardson agreed to interview the former White House intern in his Watergate apartment at 7:30 a.m. He left in the middle of the interview, leaving Miss Cooper and an assistant to finish up, so he could go to the White House for a meeting.

Within a week, Mr. Richardson instructed his staff to offer the job to Miss Lewinsky. After taking some time to think about it, she declined.

In offering Miss Lewinsky a job, Mr. Richardson did not follow hiring procedures normally used at the U.S. Mission at the United Nations, which include advertising a position and recruiting several qualified candidates. Within hours after the scandal broke on Jan. 21, reporters demanded to know whether such procedures had been followed.

Miss Cooper and Mr. Mitchell responded by publicly stating that if Miss Lewinsky had accepted the job offer, she would have been a "schedule-C" employee, or political appointee. On Jan. 26, five days after the scandal broke, Mr. Richardson's office issued an "administrative instruction" to all employees that said "the usual procedures" for hiring and reassigning "do not apply" to political appointees.

Mr. Mitchell said this week he does not know whether the instruction represented a departure from previous policy.

"Everyone from the highest official to the lowest mail clerk instantly knew this was about Monica Lewinsky," said one source close to the case. "I mean, this just came out of nowhere. It was obvious that Richardson's people were trying to retroactively cover their tracks."

On Feb. 2, a team of inspectors from the State Department's Office of Inspector General (OIG) showed up at Mr. Richardson's New York offices to conduct a routine audit of management practices. They immediately told U.N. employees that the mission's political branch was significantly understaffed, especially in comparison to the understaffed press office, according to OIG spokeswoman Tamara Alkner.

Nonetheless, while the inspectors were still conducting their audit at the New York offices in February, Mr. Aronsohn was

Explicitly transferred from the political section to the press section, Miss Faulkner said.

"OIG was surprised during the inspection when an officer was transferred out of the overworked political section and assigned to .

. . . outreach programs" in the press office, the team of inspectors wrote in a report that was issued in May. "This was done even though the press and public affairs section already has 12 employees, several of whom specialize in public outreach.

"The move does not make sense organizationally, because it created a duplication in outreach responsibilities. There is also the question of the impact of the move on the already overstretched political section."

During his testimony before the Senate committee, Mr. Richardson said there was "no relationship whatsoever" between creation of a public outreach job in the U.N.'s press section and his decision to offer that job to Miss Lewinsky.

"It was an existing slot," Mr. Richardson testified. "It was not created for anybody."

He added: "This position was created way before I established my tenure at the United Nations, so it was with prior ambassadors to the United Nations. It was an existing slot."

Sen. Frank H. Murkowski, chairman of the committee, said: "Who, if anyone, now holds that particular position?"

"The position is held by Paul Aronsohn," Mr. Richardson said.

"And he was offered the position after Ms. Lewinsky?" the Alaska Republican said.

"Yes," Mr. Richardson said. "He was offered the position in January. And he assumed the position."

Mr. Richardson did not explain why the job was not offered to Mr. Aronsohn until three months after it was offered to Miss Lewinsky. Nor did he attempt to reconcile his assertion that the slot existed before October with the OIG's assertion that the slot was not transferred from the political office to the press office until February.

'A FUNGIBLE SLOT'

Miss Cooper and Mr. Mitchell gave complex, convoluted explanations of the Lewinsky job offer, often contradicting themselves and each other. For example, at one point during a lengthy interview, Miss Cooper said: "The job that I wanted to fill was one that never existed." At other times she insisted Mr. Richardson was correct when he testified the job had previously existed.

"It's a fungible slot," Miss Cooper said. "You can trace a slot, you can't say this person held that particular position because position has evolved."

Nonetheless, Miss Cooper offered the following explanation:

Miss Lewinsky was actually not offered the slot now held by Mr.

Aronsohn, Miss Cooper said. She was actually offered a separate slot in the media wing that had been occupied by a secretary named Regina Griego, who departed around the time Miss Lewinsky was interviewed.

Miss Cooper said she split Miss Griego's job into two new slots - one to handle clerical duties, which included answering phones, and another to handle "public outreach" duties.

Miss Griego's clerical duties were taken over by a "contract secretary" who was moved from New York to Washington, Miss Cooper said. The slot for Miss Griego's "public outreach" duties remains unfilled to this day, Miss Cooper said.

When Mr. Aronsohn was transferred from the political section to the press section in February, his slot was also transferred, Miss Cooper said. Thus, he was able to take over Miss Griego's public outreach duties - which had been offered to Miss Lewinsky - without actually filling the slot that had been designated for that purpose.

In essence, according to Miss Cooper, the position that Miss Griego vacated was the same position that Mr. Aronsohn filled - and the same one that was offered to Miss Lewinsky. Still, she acknowledged the job descriptions for Miss Griego and Mr. Aronsohn, which she refused to disclose, are as dissimilar as "apples and oranges."

Asked why this was not explained by Mr. Richardson to the Senate committee, Miss Cooper said: "It's such a nuance. What the senators were focused on - I mean, I gotta tell you . . . you're kind of getting into things that are really splitting hairs."

Government personnel experts scoffed at the notion that Miss Griego - who had enough clerical duties to keep the secretary who replaced her occupied on a full-time basis - was replaced by the far-more-experienced Mr. Aronsohn.

"It was a low-level position that paid around \$30,000," said Mr. Richardson, who added later in the hearing: "Again, it was a low-level position."

Still later, he emphasized: "This was a position that was not a very high-level position."

Miss Cooper said "Paul Aronsohn makes much more" than what Miss Lewinsky was offered, and was recently given a significant pay raise. She also said he gets other compensation that Mr. Richardson was not able to offer Miss Lewinsky, but refused to be more specific.

Mr. Mitchell, while acknowledging Mr. Aronsohn's salary is a matter of public record, refused to disclose it to The Washington Times. Mr. Aronsohn also refused to tell a reporter how much he makes.

Paul Aronsohn's now feeling a little bit down because he feels everyone now perceives him as the guy who got the job Monica was handed down," Miss Cooper said. "Well, Paul has far more experience in that and he shouldn't view himself that way. People who held this job previously shouldn't regard themselves as the people who held the Monica slot. The job has evolved."

4 NEW YORK SLOT

During his hearing, Mr. Richardson took pains to emphasize the importance of keeping the job in question in New York, even after it was shifted from the political section to the press section. The job had been considered by Miss Lewinsky primarily because she wanted to move from Washington to New York.

Mr. Richardson went so far as to contradict Mr. Murkowski when the senator suggested the ambassador had "transferred an employee out of the political section in New York to assist your chief of staff in

Washington, D.C. with outreach programs. Is this the case?"

"That is not correct," Mr. Richardson said. "An employee was taken out of the political section in New York - this was a political appointee - and placed under the supervision of my chief of staff in New York. So the position was moved to a New York position for purposes of outreach.

"The purpose of this position was to build constituency groups and business support for our efforts. But the position was in New York. The position was held - is held by an individual by the name of Paul Aronsohn, who is a very good employee who is doing the work."

Later in the hearing, Mr. Richardson said his desire for a New York-based outreach employee predated his meeting with Miss Lewinsky.

"We wanted it way before we even thought of her," Mr. Richardson said. "Move it to New York, because that's where most of the business and constituency groups are. And we stand behind our decision - we filled the position."

But according to Miss Cooper, Mr. Richardson had transferred Mr. Aronsohn from New York to Washington in early July. She said the ambassador would have explained this to the senators "had they followed up on it. It's really splitting hairs at this point. I mean, I think I would have been annoyed if I were a committee member and Ambassador Richardson digressed into: 'Well, right now he's in Washington because he didn't want to sign a year lease [in New York] and his wife is looking to move here.'"

She added: "The job description you can do from just about anywhere, as long as you have instant lines of communication."

JOBS FOR SILENCE?

Mr. Richardson's re-emergence in the Lewinsky scandal refocuses attention on one of the central aspects of the case - whether Mr. Clinton and his associates tried to buy her silence through the promise of jobs. After turning down Mr. Richardson's offer, Miss Lewinsky was offered a job at Revlon in New York, thanks to the intercession of presidential friend Vernon E. Jordan Jr., who is on Revlon's board of directors.

Although Miss Lewinsky was interviewed for a job in the White House press office in May 1977, most efforts at finding her a job were oriented toward New York. According to Lucianne Goldberg, who has listened to tapes of Miss Lewinsky talking with mutual friend Linda R. Tripp, the former White House intern was under the impression that Mr. Clinton wanted her in New York, not Washington,

as to be farther away from any investigation of their relationship.

Summing up the controversy over Miss Lewinsky's job offer at the U.N., Miss Cooper said: "All the allegations that people try to suggest, for example, that we created the job just for Monica, that doesn't hold up. Because regardless of Monica and prior to me ever knowing that Monica Lewinsky was ever going to ever be anyone in the newspaper, I continued to have that need and I filled it."

TABULAR OR GRAPHIC MATERIAL SET FORTH IN THIS DOCUMENT IS NOT DISPLAYABLE

Photos (A&B, color), A) Private entrance: Monica Lewinsky prepares to enter the courthouse with reporters kept at a distance.; B) U.N. Ambassador Bill Richardson; C) U.N. Ambassador Bill Richardson testifies last month at his Senate confirmation hearings for the energy secretary post., A) By Karen Ballard/The Washington Times; B) NO CREDIT; C) By Kenneth Lambert/The Washington Times

---- INDEX REFERENCES ----

EDITION: 2

Word Count: 2315
8/7/98 WATIMES A1
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Copr. (C) West 1998 No Claim to Orig. U.S. Govt. Works

Tab 66

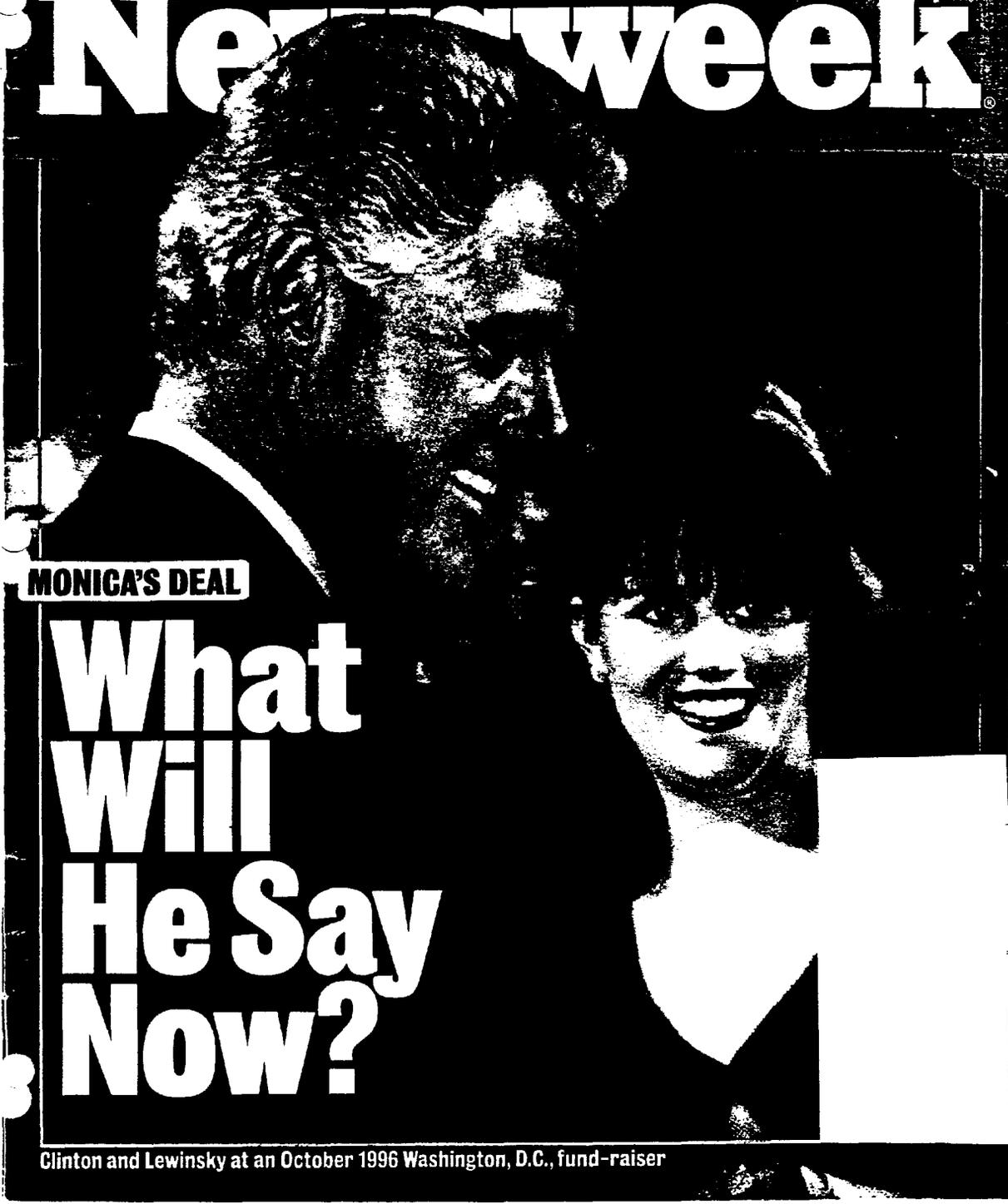
INVESTING FOR INFLATION • LIZ PHAIR GROWS UP

Newsweek

MONICA'S DEAL

**What
Will
He Say
Now?**

Clinton and Lewinsky at an October 1996 Washington, D.C., fund-raiser



NATIONAL AFFAIRS

many years. Talks between the two sides had come to a halt two weeks ago when Starr called Stein directly. In order to remove any bad blood between the prosecution and Lewinsky's defenders, Starr cut his more hawkish deputies out of the negotiations. In their place he substituted Sam Dash, an old Washington hand (he had been the chief counsel of the Senate Watergate Committee) who had an easy relationship with Stein and his co-counsel, Plato Cacheris. Meeting at Dash's home over bagels, the two sides worked out an arrangement that would allow Lewinsky to give prosecutors a preview of what she would be willing to say under oath. Early last week Lewinsky flew from her home in Los Angeles to a secret meeting with prosecutors in New York City, far from the Washington media stakeouts. Questioned first by a friendly lawyer from Cacheris's office, then by the prosecutors, Lewinsky talked for four and a half hours. By the next morning, the two sides had a deal.

Starr's team had some extra leverage to make sure Lewinsky was willing to tell the whole truth. Sometime last winter, Lewinsky had given the dress to her mother, Marcia Lewis, for safekeeping. That made Lewis a possible target of Starr's probe, a reality that was brought home to her when she was summoned before the grand jury last February—and collapsed under questioning. Under last week's deal, Lewis is also immune from prosecution.

The hard-liners on Starr's team had been hesitant to offer promises of immunity to Lewinsky without very specific promises of testimony in return. They felt badly burned by former associate attorney general Webster Hubbell, who promised to give testimony in the Whitewater investigation in return for Starr's help in securing a lighter sentence after Hubbell pleaded guilty to overbilling his law clients in 1994. The prosecutors believe that Hubbell basically pulled a bait-and-switch, refusing to say much of anything once he had a deal. Starr's team was determined not to make the same mistake with Lewinsky.

In addition to the dress, Lewinsky

Close encounters:
In Oct. 23, 1996,
Starr and Clinton met
at the Washington
Washington



turned over tapes of several voice-mail messages allegedly left by Clinton. The president's words did not seem sexually suggestive—"Hey, it's me," he reportedly said. "Sorry I missed you." But the familiarity between the chief executive and former intern was embarrassing. "There's always been an assumption that the president wouldn't be stupid enough to leave his voice on an answering machine," said one disheartened White House aide. More dangerous are the gifts that Lewinsky turned over to the president's secretary rather than comply with a subpoena in the Paula Jones case.

In the tape recording of a conversation between Lewinsky and Tripp last December that NEWSWEEK was permitted to hear, Lewinsky was eager to get rid of any incriminating presents. She referred to an official White House photograph and worried that the inscription from Clinton was so personal that lawyers for Jones would use it against her. She told Tripp that she had tried to call Betty Currie, the president's secretary, to ask for a clean copy of the picture so that she might have one to give Jones's lawyers. But on the tape, she complains that Currie was unavailable. There may also be another photo of interest to the prosecutors. According to Goldberg, Lewinsky was photographed standing beside the president in the Oval

Office. She was wearing a blue cocktail dress.

If the reported stain on the dress turns out to be the president's semen (the lab tests may take several weeks), Clinton has an immediate perjury problem. Last January he denied under oath in his Jones deposition that he had ever had "sexual relations" with Lewinsky. Lying about a sexual relationship in a deposition in a civil case may not be perceived as a serious offense. Lying before the grand jury in a criminal investigation is more grave. It would surely be an indictable offense in a normal criminal probe. Less certain is whether it is an impeachable offense in Congress, which will probably serve as Clinton's judge and jury.

The ultimate focus of Starr's case is not sex, but obstruction of justice. Under the immunity deal worked out between Starr and Lewinsky's lawyers, described to NEWSWEEK by a knowledgeable source, Lewinsky will testify that she and the president discussed cover stories designed to keep their alleged relationship private. Lewinsky reportedly will say that at a meeting at the White House in late December, she told the president her worries about the subpoenaed gifts, which included a brooch and a book of poetry. The president did not directly tell her to lie, she says. Rather, he spoke hypothetically. If you don't have the gifts, he allegedly said, you can't turn them over. Such a veiled suggestion would hardly be the kind of evidence a

Regardless of what happens in the courts or Congress, **47%** think the president owes the country an explanation of the Monica matter; **49%** say he doesn't

Tab 67

**Office of the Independent Counsel**

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

August 11, 1998

By Hand

The Honorable Eric H. Holder, Jr.
Deputy Attorney General of the United States
United States Department of Justice
10th St. & Constitution Ave., NW
Washington, D.C. 20530

Dear Deputy Attorney General Holder:

Rule 6(e) of the Federal Rules of Criminal Procedure binds all attorneys for the government, including those employed by the Department of Justice who are privy to information regarding "matters occurring before the grand jury." And, as Chief Judge Johnson has recently written, Rule 6(e) protects against the disclosure not merely of the actual testimony of grand jury witnesses before the grand jury but also of the substance of their testimony as conveyed to government attorneys and agents in anticipation of their grand jury appearance.

The enclosed article from Newsweek magazine recounts in detail what Officers Muskett and Byrne told "Secret Service and Justice Department lawyers." The article identifies its source as these "government lawyers" and makes out a potential prima facie case that attorneys for the Department of Justice (and possibly Secret Service) involved in the litigation have violated Rule 6(e). Please advise me at your earliest convenience of the steps you are taking to identify the source of these disclosures and prevent future violations of Rule 6(e) so that I may take appropriate action.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Kenneth W. Starr".

Kenneth W. Starr
Independent Counsel

Enclosure



Monica On The S

NATIONAL AFFAIRS

As Lewinsky tells her story to the grand jury, the president's team ponders how to fight back—in part, perhaps, by attacking the former intern's credibility. How ugly could it get? BY DANIEL KLAIDMAN, KAREN BRESLAU AND MICHAEL ISIKOFF

DAVID KENDALL DIDN'T WASTE time. When the news broke late last month that Monica Lewinsky had finally struck an immunity deal with Kenneth Starr, the president's lawyer began working the phones. He'd received an intriguing fax from a man named David Bliss, who said he had a story about Lewinsky that Kendall might want to hear. Kendall quickly faxed him back, thanking Bliss for sending the "very welcome" material "out of the blue." Kendall followed up with a phone call to Bliss, leaving a solicitous message—which Bliss played for NEWSWEEK—on his answering machine. "I think it's important that we get together and, you know, decide how to proceed," Kendall said.

What did Bliss have on Lewinsky that was so tantalizing to the president's lawyer? Bliss, a drama-department shop foreman at Lewis & Clark College, told Kendall that when Lewinsky was a 21-year-old student there in 1995, she had forged a letter in his name on school stationery. Apparently Lewinsky was trying to help out Andy Bleiler, a married drama coach with whom she was allegedly having an affair. Bleiler was out of work, and embroiled in a custody battle. The forged letter—a purported job offer from Bliss to Bleiler—was supposed to help Bleiler's case. But the scheme went bad when the letter—which Bleiler says he never knew about—was returned to Bliss's mailbox as undeliverable. Bliss immediately suspected Lewinsky, who had been pestering him relentlessly to find work for Bleiler. Confronted with the letter, she proclaimed herself "humiliated," and begged forgiveness. But Bliss wasn't the forgiving kind. He took his story to Kendall. (A lawyer for Lewinsky declined to comment.)

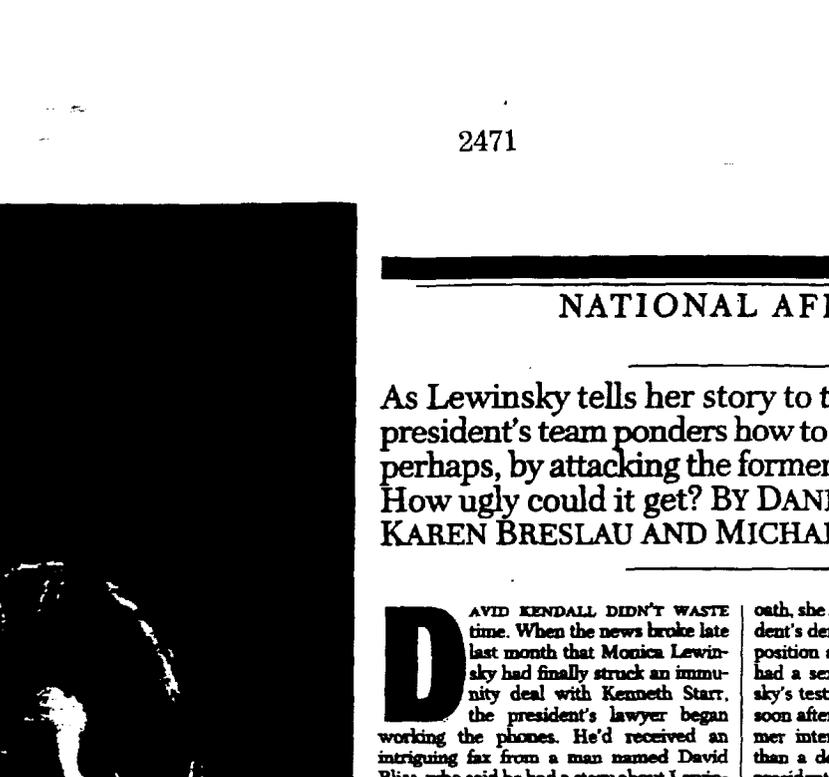
The president's lawyer was all ears. Now that Lewinsky has become a fully immunized witness for the prosecution, Kendall is looking for details that might enable him to undermine Monica's credibility. Last week Lewinsky spent six hours before the grand jury in Washington. There, under

oath, she apparently contradicted the president's denials—both in his Paula Jones deposition and to the country—that the two had a sexual affair. The basics of Lewinsky's testimony began leaking to the press soon after she left the courthouse. The former intern reportedly admitted to more than a dozen sexual encounters with the president—and said that she and Clinton discussed how to conceal their relationship. But on the question of whether Clinton explicitly asked her to lie under oath, Lewinsky refused to testify that the president instructed her to perjure herself.

As Kendall prepares his legal counteroffensive—and with Clinton's Aug. 17 testimony just a week away—there are obstacles everywhere. Any lawyer's biggest fear is a surprise question that leaves his client befuddled and in danger of falling into a perjury trap. This is exactly what Kendall is up against. The biggest unknown, and one that could conceivably wreck all of Kendall's careful preparation, is the blue dress currently undergoing testing at the FBI lab. Does it contain "DNA evidence"? The crime lab may have already completed initial tests. But the end results—and whether Starr will ask the president for a DNA sample—are being tightly held. If the tests come back positive, and the results are linked to Clinton, anything Kendall might have dug up to discredit Lewinsky might be rendered irrelevant. But Kendall doesn't have the luxury of knowing what those tests will reveal. The best he can do is prepare his case—and his client—and get ready for the worst.

Meanwhile, Starr's staff is moving rapidly to complete its probe and may submit a possible report to Congress by early September. Contrary to expectations that Starr would present evidence of a broad pattern of obstruction of justice, NEWSWEEK has learned the report will focus only on the Lewinsky matter and other allegations flowing out of the Paula Jones case. After four years and more than \$40 million, the independent counsel has won a string of Whitewater criminal convictions and still has two indictments pending. But whatever evidence Starr has developed against the

Her day in court: Lewinsky at the federal courthouse, where she testified for six hours



Stand

NATIONAL AFFAIRS

president relating to Whitewater—and other matters such as the Travel Office affair and the FBI file scandal—sources say it is not strong enough to be included in an impeachment report. The findings could potentially cut both ways. The narrow scope of the report will allow White House spinners to denigrate Starr's entire probe as little more than a sexual inquisition. But a tightly focused report could present problems for the White House—laying out the lurid Lewinsky charges in stark and simple language that may be difficult to dispute.

No matter what Starr's report reveals, Kendall's immediate problem remains the same: how to make Clinton appear more credible than Lewinsky. One option: do "opposite" research on the chief accuser. Before Lewinsky reached an agreement with Starr, Kendall tread lightly on her past to avoid pushing her into the independent counsel's camp. Since she's cut her deal, however, Kendall is no longer restrained. For now, the lawyer is keeping potentially damaging stories in his briefcase. But they could prove useful to him during possible impeachment hearings, where Democrats loyal to the president would get the chance to interrogate the former intern.

Kendall's Lewinsky digging isn't confined to Monica's Lewis & Clark days. He is also interested in the story of a Democratic activist from Indianapolis named John Sullivan, who recalled meeting Lewinsky at an October 1996 fund-raiser in Washington. As he waited along the rope line to shake Clinton's hand, Sullivan says he was pulled aside by an event organizer. She told him that the woman standing next to him was named Monica, and that Monica was infatuated with the president and may have fantasized about having a relationship with him. Would Sullivan keep an eye on her? The incident came to light last week when an Indianapolis TV reporter saw a tape of the event and recognized Sullivan—who then told his story to the reporter. Sullivan told NEWSWEEK Kendall

called him last week and asked about the event. Sullivan says the smooth lawyer, himself an Indiana native, played up his Hoosier roots to try to win Sullivan's trust.

Soft-spoken and camera averse, Kendall has a reputation as a gentleman lawyer. But he is a tenacious and crafty litigator with a reputation for tying his opponents in knots. Starr has already gotten a taste of Kendall's tactics. When the president's lawyer petitioned the courts to investigate the independent counsel's alleged grand-jury leaks to the press, it was seen as a somewhat desperate publicity stunt. But last week it was revealed that Judge Norma Holloway Johnson came down on Kendall's side—ruling that there probably were illegal leaks, and ordering Starr to prove his office wasn't the source. Last week a federal appeals court handed Starr one minor victory on the matter: it denied Kendall the opportunity to interrogate Starr's prosecutors about the leaks. Still, Johnson's decision was a blow to the independent counsel, and gives new ammunition to the White House spin team that Starr is out of control.

In public, the president is trying to rise above the legal imbroglio. After the embassy bombings in Africa last Friday, Clinton solemnly vowed to bring the terrorists to justice. This week, as the flag-draped coffins arrive home, the president will have other opportunities to emphasize statecraft over scandal. But those who saw Clinton last week after hours described him as burdened and withdrawn, rubbing his eyes and staring absently into space.

It's up to Kendall to take his dispirited client and transform him into a compelling,



MARIN COOPER—GAMMA-LIAISON

telegenic and credible witness. He's done it before. When Clinton gave videotaped testimony in previous Whitewater trials, jurors said they were "beguiled" by the president's performance. But trying to explain an alleged affair is a taller order. Kendall is legendary for exhaustive preparation sessions in which he grills his clients over and over, day after day, making them repeat their answers. In a case this complex, with so many

The First Firm: A Very Small Circle

They're the whitest of white-shoe lawyers, and their brief—resolving the Lewinsky crisis for the First Client—couldn't be more important, or more difficult. But the four attorneys helping the president provide more than just legal counsel. They are now the only people in Bill Clinton's life with whom he enjoys protected, privileged conversation beyond the reach of Kenneth Starr's subpoenas.



David Kendall

He didn't know Bill and Hillary at Yale. But now David Kendall is on the inside. His mild manner belies his fierce legal instincts. A partner at Williams & Connolly, the white-collar defense law firm, Kendall is a courtroom tiger just like the firm's founder, Edward Bennett Williams.



Nicole Sellgman

The Harvard law grad—and editor of the Harvard Law Review—is Kendall's partner at Williams & Connolly and a legal powerhouse in her own right. She helped craft Oliver North's defense. A friend and lawyer to John Kennedy's kids, she's said to have the complete confidence of the First Lady.



Monica's team: *Plato Cacheris (left) and Jacob Stein, the lawyers guiding Lewinsky through the war between Clinton and Starr*

second-floor office overlooking the South Lawn, Kendall methodically runs through the evidence, asking the president to explain everything from Lewinsky's White House visits to her high-powered job search. There are usually only two others allowed in the room: Hillary Clinton and Mickey Kantor, another private lawyer.

No matter how thoroughly Kendall preps his client, however, he can't anticipate every question the special prosecutor might ask. Even Starr doesn't have all the answers. For months, for example, there have been numerous hazy press reports that a uniformed Secret Service officer witnessed an alleged encounter between Clinton and Lewinsky. The story has changed over time, and the details remained sketchy. A NEWSWEEK reconstruction of the events may shed some light on the incident. On Easter Sunday 1996, according to government lawyers, officer John Muskett was stationed outside the Oval Office. A phone call came

possible hidden traps, that means the president and his lawyer will be spending plenty of quality time—and billable hours—together this week. The drill has already begun. In the mornings—and sometimes again in the evening—Kendall and his partner Nicole Seligman slip into the White House. They use the East Entrance to the private quarters, avoiding the cameras along the West Wing driveway. There, in Clinton's

in for the president, but Clinton didn't respond. Muskett couldn't locate the president. Spotting Harold Ickes, Muskett asked the then deputy chief of staff for help. They knocked on the door to the Oval Office, but got no response. They then went to the door of the president's nearby private study. They knocked again, then opened the door.

What happened next is a matter of some controversy. Muskett later told Secret

Service and Justice Department lawyers that he merely saw Lewinsky emerge from the room Clinton was in. But a fellow Secret Service officer, Gary Byrne—who wasn't present that day—told the government lawyers a different version. He said Muskett had told him that when they opened the door, Lewinsky's head was in Clinton's lap. Muskett has denied Byrne's account. And Ickes says he doesn't recall any aspect of the story. But sources tell NEWSWEEK it was likely this incident that prompted Byrne to warn senior Clinton aide Evelyn Lieberman that Lewinsky was hanging around the Oval Office, and might be a potential problem. Shortly afterward, Lewinsky was transferred out of the White House to a job at the Pentagon. Now, NEWSWEEK has learned, Starr's prosecutors, confronted with the contradictory accounts, want Justice Department officials to tell them what they were told in their interviews with Muskett and Byrne. Justice might agree to do so as early as this week. (Neither Muskett nor Byrne would comment to NEWSWEEK.)

With a week to go, Clinton aides are doing their best to conduct Business as Usual. This week Clinton will crisscross the country raising money for congressional Democrats and presiding over official White House "message events" wherever Air Force One touches down—touting voter favorites like the patients' bill of rights, clean-water laws and gun control.

But Clinton's mind may be elsewhere. Last week the president and First Lady invited a group of youth-violence experts to a cozy dinner in the Blue Room of the White House. There they hashed over the latest social theories about juvenile-crime prevention. According to some guests, Clinton, who normally revels in after-hours work sessions, seemed at times detached and weary. He faded in and out of the conversation, and was difficult to engage. Mrs. Clinton carried the dinner for both of them. She eagerly took notes and peppered the

assembled academics and religious leaders with detailed questions. At the end of the evening, after most of the guests had departed and the First Lady had gone upstairs, Clinton lingered with Harvard professor Cornel West and a few others. How can you maintain your faith in the system when "right-wing gangsters in ties" seem intent on tearing you down? West asked the president. "They've been at me for a long time," Clinton responded. "I'm prepared." David Kendall certainly hopes so.

With DEBRA ROSENBERG and MARK HOSENBALL



Mickey Kantor

He first met the Clintons in the '70s when he and Hillary worked at the do-good Legal Services Corp. And for more than two decades he's been a trusted political adviser to the Clintons—chairing their '92 campaign and serving as U.S. trade rep and Commerce secretary. The firm's best pol.



Hillary Clinton

She was once named one of the top 100 lawyers in America. And for good reason: the Yale grad and partner at Little Rock's Rose Law Firm has a topnotch legal mind. She guides the First Firm but also defers to Kendall and Seligman. They know white-collar criminal defense. She doesn't.

Tab 68

UNDER SEAL

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE GRAND JURY PROCEEDINGS

Misc. Action No. 98-278

UNDER SEAL**FILED**

AUG 11 1998

IVANCY MAYER-WHITTINGTON, CLERK
U.S. DISTRICT COURT

MEMORANDUM ORDER

Lanny Breuer, Special Counsel to the President of the United States, has refused to answer certain questions before a grand jury, asserting both the governmental attorney-client privilege and executive privilege. At a hearing on August 4, 1998, the Office of Independent Counsel ("OIC") orally moved to compel Mr. Breuer's testimony.¹ The Court then ordered the OIC to submit materials that show its need for the evidence claimed to be covered by the executive privilege.

Preliminarily, the Court finds that the doctrine of collateral estoppel does not prevent Mr. Breuer and the Office of the President ("the White House") from asserting executive privilege. It is true that Bruce Lindsey asserted executive privilege in a previous matter before this Court and that the Court found that the executive privilege applied but was overcome by the OIC's showing of need. While choosing not to appeal that ruling, the White House now seeks to litigate some of the same issues again, including the OIC's need for privileged information. Although the legal issues remain much the same, the importance and sensitivity of this matter require a case-by-case determination of whether the executive privilege applies and whether it has been overcome by a proper showing of need. The factual issue of whether the OIC needs the particular information

¹ The Court resolved the motion to compel pertaining to the governmental attorney-client privilege in its Order of August 7, 1998.

apparently possessed by Mr. Breuer is sufficiently different from the issue involving Mr. Lindsey to convince the Court that Mr. Breuer is not barred from asserting privilege in these circumstances.

Scope of the Presumptive Executive Privilege

In its Order of August 5, 1998, the Court found that the communications to which Mr. Breuer has asserted the executive privilege are presumptively privileged. Executive privilege, also known in this context as the presidential communications privilege, is a governmental privilege intended to promote candid communications between the President and his advisors concerning the exercise of his Article II duties. United States v. Nixon, 418 U.S. 683, 705, 708, 711 (1974); In re Sealed Case, 121 F.3d 729, 744 (D.C. Cir. 1997). In accordance with binding precedent on the issue, this Court must treat the subpoenaed testimony of Mr. Breuer as presumptively privileged.²

The executive privilege is limited to "communications authored or solicited and received by those members of an immediate White House adviser's staff who have broad and significant responsibility for investigating and formulating the advice to be given to the President on the

² See Nixon, 418 U.S. at 713 (holding that when the President of the United States claims executive privilege, the district court has a "duty to . . . treat the subpoenaed material as presumptively privileged"); In re Sealed Case, 121 F.3d at 744 ("The President can invoke the privilege when asked to produce documents or other materials that reflect presidential decision-making and deliberations and that the President believes should remain confidential. If the President does so, the documents become presumptively privileged."); see also Senate Select Comm. on Presidential Campaign Activities v. Nixon, 498 F.2d 725, 730 (D.C. Cir. 1974) ("Presidential conversations are 'presumptively privileged,' even from the limited intrusion represented by in camera examination of the conversations by a Court."); Nixon v. Sirica, 487 F.2d 700, 717 (D.C. Cir. 1973) ("We . . . agree with the District Court that such conversations are presumptively privileged.").

particular matter to which the communications relate.” *Id.* at 752. Communications that do not relate to presidential decision-making are not included within the scope of the executive privilege. See, e.g., *Nixon v. Administrator of General Services*, 433 U.S. 425, 449 (1977) (noting that the privilege is “limited to communications ‘in performance of [a President’s] responsibilities,’ ‘of his office,’ and made ‘in the process of shaping policies and making decisions.’”); *In re Sealed Case*, 121 F.3d at 752 (“Of course, the privilege only applies to communications that these advisers and their staff author or solicit and receive in the course of performing their function of advising the President on official government matters.”).

While finding the other communications at issue to be “presumptively privileged,” the Court holds that Mr. Breuer’s communications with persons in the Office of Legislative Affairs do not fall within the scope of the presumptive executive privilege. Mr. Breuer testified that he was asked by the head of the Legislative Affairs Office, where Monica Lewinsky had worked, to speak to a group of individuals in that Office who were fearful of being called by the press or the OIC. Mr. Breuer states that he provided legal advice to those individuals. This conversation does not appear to have been in the course of Mr. Breuer’s advising the President on official government matters and thus cannot be covered by the executive privilege.

The Standard Required to Overcome the Privilege

The executive privilege is not absolute. *Sirica*, 487 F.2d at 716. In order to overcome this privilege, the OIC must make a sufficient showing of need as defined by the D.C. Circuit in *In re Sealed Case*, 121 F.3d at 754. *In re Sealed Case* directs that the OIC must show with specificity “first, that each discrete group of the subpoenaed materials [or testimony] likely contains important evidence; and second, that this evidence is not available with due diligence

elsewhere.” *Id.* The information sought need not be “critical to an accurate judicial determination.” *Id.*

The White House asserts that the recent decision of the Court of Appeals in *In re Lindsey*, No. 98-3060 (D.C. Cir. July 27, 1998), has heightened the required showing of need for materials allegedly covered by the executive privilege in the context of this case. According to the White House, it should be more difficult for the OIC to obtain these materials because the President anticipates impeachment proceedings and that fact should alter the relevant need analysis. In *In re Lindsey*, the Court of Appeals states: “[I]nformation gathered in preparation for impeachment proceedings and conversations regarding strategy are presumably covered by executive, not attorney-client, privilege. While the need for secrecy might arguably be greater under these circumstances, the district court’s ruling on executive privilege is not before us.” *Id.*, slip op. at 24.

The Court rejects the White House’s argument that the possibility of impeachment changes the need analysis set forth in *In re Sealed Case*. First, the Court of Appeals did not change the need analysis in its *In re Lindsey* opinion. The issue of executive privilege was not before the Court of Appeals and its suggestion that the need for confidentiality could be heightened under certain circumstances was clearly dictum. In addition, the Court of Appeals’ supposition that “the need for secrecy might arguably be greater” in the face of potential impeachment, *In re Lindsey*, slip op. at 24 (emphasis added), does not lead this Court to conclude, as the White House contends, that the D.C. Circuit “made clear that the analysis of any assertion of the presidential communications privilege is different where the OIC investigation arises under the specter of impeachment proceedings.” White House’s Response to the OIC’s *In*

Camera Submission at 4.

Second, this Court declines to hold that the executive privilege need analysis changes when White House advisors are preparing for possible impeachment proceedings. In essence, the White House argues as follows: (1) The President may withhold privileged communications from Congress even when the same communications would be discoverable in judicial proceedings;³ (2) the OIC will likely submit an impeachment report to Congress; and (3) therefore, the White House should not be compelled to turn over information to the grand jury because that information might be given to Congress. However, the subpoena before the Court is a grand jury subpoena, not a congressional subpoena, and the Court must treat it as such even assuming that the OIC will prepare and submit a report to Congress. It is not known whether the information sought here by the grand jury will be included in any such report. Thus, the contention that information sought by the grand jury could at some time be given to Congress is not ripe for review.

The Court agrees that the President and his senior advisors have a significant need for confidentiality when discussing possible impeachment proceedings. Nevertheless, they have the same need when discussing all other kinds of presidential decisions and strategies. When it formulated the executive privilege need standard in In re Sealed Case, the D.C. Circuit explicitly recognized the “‘great public interest’ in preserving ‘the confidentiality of conversations that take place in the President’s performance of his official duties.’” 121 F.3d at 742 (quoting Sirica, 487

³ Compare Senate Select Committee, 498 F.2d at 732-33 (holding that the President need not produce materials in response to a subpoena from a legislative committee) with, e.g., Sirica, 487 F.2d at 717 (holding that the President must produce materials in response to a grand jury subpoena).

F.2d at 717). The Court of Appeals also understood that such a privilege was “necessary to guarantee the candor of presidential advisers and to provide ‘[a] President and those who assist him . . . [with] free[dom] to explore alternatives in the process of shaping policies and making decisions and to do so in a way many would be unwilling to express except privately.’” *Id.* at 743 (quoting *Nixon*, 418 U.S. at 708). The same interests apply in the impeachment context and there is simply no authority for having the rigor of the executive privilege analysis depend upon the subject matter discussed.

In concluding its *In re Sealed Case* opinion, the D.C. Circuit stated:

In holding that the privilege extends to communications authored by or solicited and received by presidential advisers and that a specified demonstration of need must be made even in regard to a grand jury subpoena, we are ever mindful of the dangers involved in cloaking governmental operations in secrecy and in placing obstacles in the path of the grand jury in its investigatory mission. There is a powerful counterweight to these concerns, however, namely the public and constitutional interest in preserving the efficacy and quality of presidential decisionmaking. We believe that the principles we have outlined in this opinion achieve a delicate and appropriate balance between openness and informed presidential deliberation.

Id. at 762. The concerns raised by the White House have been amply considered by the D.C. Circuit. This Court cannot and will not disturb the “delicate and appropriate balance” so carefully struck by the Court of Appeals.

Thus, the Court will turn to this Circuit’s interpretation of the need standard. The first requirement — “that each discrete group of the subpoenaed materials [or testimony] likely contains important evidence” — charges that the evidence sought must be “directly relevant to the issues that are expected to be central to the trial.” *Id.* As the D.C. Circuit noted, this requirement will ordinarily have limited impact because Federal Rule of Criminal Procedure

17(c) already restricts the reach of a subpoena to relevant information. *Id.* at 754.

With respect to the second requirement — that “this evidence is not available with due diligence elsewhere” — the party seeking to overcome the privilege should first attempt to determine whether sufficient evidence could be obtained elsewhere. *Id.* at 755. The issuer of the subpoena “should be prepared to detail these efforts and explain why evidence covered by the presidential privilege is still needed.” *Id.* The D.C. Circuit noted:

there will be instances where such privileged evidence will be particularly useful, as when, unlike the situation here, an immediate White House advisor is being investigated for criminal behavior. In such situations, the subpoena proponent will be able easily to explain why there is no equivalent to evidence likely contained in the subpoenaed materials.

Id. (emphases added). That court also explained that “a grand jury will often be able to specify its need for withheld evidence in reasonable detail based on information obtained from other sources.” *Id.* at 757. Finally, if the grand jury has difficulty obtaining evidence from other sources, “this fact in and of itself will go far toward satisfying the need requirement.” *Id.*

Lastly, if a “demonstrated, specific need” is shown, then the subpoenaed testimony shall be given to the grand jury unless there is “no reasonable possibility that the category of materials the Government seeks will produce information relevant to the general subject of the grand jury’s investigation.” *United States v. R. Enterprises*, 498 U.S. 292, 300 (1991).

3. The OIC’s Showing of Need

The OIC has made an extensive *ex parte* submission to the Court regarding its need for this evidence, which the Court has carefully reviewed *in camera*. This submission incorporates and updates the OIC’s previous need submission in connection with Bruce Lindsey’s invocation of executive privilege as well as two other prior *in camera* need submissions from the OIC. The

OIC's current need submission describes fifteen categories of information that it seeks from Mr. Breuer and explains how each category meets the In re Sealed Case need standard. Because the Court has reviewed the OIC's submission in camera, it is unable to describe in any detail the basis for its findings. See In re Sealed Case, 121 F.3d at 740.

As for the first requirement, the Court finds that the testimony the OIC seeks likely contains important evidence that would be directly relevant to central issues in the grand jury's investigation. The OIC has been authorized to investigate whether Monica Lewinsky "or others" suborned perjury, obstructed justice, or tampered with witnesses, Order of the Special Division, Jan. 16, 1998, and the testimony withheld on the basis of executive privilege is likely to shed light on that inquiry.

Regarding the second requirement, the Court finds that the OIC has shown with sufficient specificity that the evidence it seeks is not available with due diligence elsewhere. See id. at 754. First, as this Court has noted before, "the crimes being investigated by the grand jury are inherently crimes of conversation and such conversations are unlikely to be recorded on paper." Order of May 4, 1998, at 12. The D.C. Circuit has declared that if a crime being investigated by the grand jury relates to "the content of certain conversations," then the grand jury's need for the exact text of those conversations is "undeniable. Obviously, this evidence is not available elsewhere; even if . . . counsel offered to provide the grand jury with every statement that was made to the White House, the grand jury would need to review the evidence in the White House files to confirm that no statements were omitted." Id. at 761 (quoting Senate Select, 498 U.S. at 732) (emphasis added). The OIC "may also be able to demonstrate a need for information that it currently possesses, but which it has been unable to confirm or disprove." Id. There is no

indication that the conversations at issue here were recorded; the only sources of information regarding those conversations are the participants themselves.

Even if the grand jury possesses testimony of one party to a conversation, it may still need the testimony of other parties to the conversation to confirm or disprove the veracity of the prior testimony. The Court is well aware that two parties to a conversation may testify quite differently. As the D.C. Circuit recognized, even if a witness agrees to testify, the grand jury would still need to review further evidence to determine if it has the complete story. *Id.* In this instance, even if one witness has testified regarding a specific conversation, the grand jury may still need to subpoena other participants in that conversation to obtain the full picture. The evidence sought here is Mr. Breuer's version of certain conversations; such evidence can be obtained only from Mr. Breuer.

Second, the OIC has provided the Court with detailed information about its unsuccessful efforts to obtain this evidence through other sources. As the Court found significant in its previous executive privilege opinion, the OIC has diligently pursued other alternatives in seeking this information. The OIC has issued 23 subpoenas duces tecum to the White House since the beginning of its investigation and has issued one to President Clinton individually. Declaration of Julie A. Corcoran ¶ 4. In addition, the OIC interviewed eighty current or former White House employees during its investigation and thirty-five current or former White House employees have testified before the grand jury. Declaration of Patrick F. Fallon, Jr. ¶¶ 4-5.

The D.C. Circuit found that, in practical terms, "the primary effect of [the unavailability] standard will be to require a grand jury to delay subpoenaing evidence covered by presidential privilege until it has assured itself that the evidence sought from the President or his advisers is

both important to its investigation and practically unavailable elsewhere.” In re Sealed Case, 121 F.3d at 756-57. The fact that the OIC has not called Mr. Breuer until this time is consistent with the OIC’s having unsuccessfully attempted to obtain the evidence elsewhere and having determined the evidence to be necessary to the grand jury’s investigation.

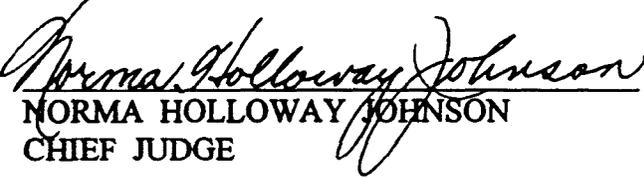
The White House contends that the OIC has many alternative sources for the information sought from Mr. Breuer, including Secret Service agents, Monica Lewinsky, and others. On the basis of the in camera submission, including declarations submitted by the OIC, the Court finds that these sources have not provided the grand jury with the information withheld by Mr. Breuer under the executive privilege. Moreover, it is not clear at this time how much information President Clinton will provide to the grand jury at his deposition.⁴ He may not remember certain events about which the grand jury seeks information.

The OIC has made a significant factual showing to the Court and has fully demonstrated its need for Mr. Breuer’s testimony. The Court also finds that the communications covered by the presumptive privilege likely contain evidence important to the grand jury’s investigation and cannot be obtained elsewhere with due diligence. The Court will therefore grant the OIC’s motion to compel the testimony of Mr. Breuer insofar as he has asserted the executive privilege.

Accordingly, upon consideration of the OIC’s in camera need submissions and the White House’s response to that submission, it is this 11th day of August 1998,

⁴ As the OIC points out, if the President intends to testify about his communications with Mr. Breuer, it is strange that Mr. Breuer is asserting executive privilege with respect to those very communications.

ORDERED that the Office of Independent Counsel's motion to compel the testimony of Lanny Breuer be, and hereby is, granted as to testimony covered by the executive privilege.


NORMA HOLLOWAY JOHNSON
CHIEF JUDGE

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Thursday, August 13, 1998

Section A

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Aide Implies President Will Not Dodge Queries
 BENNET, JAMES

President Clinton will answer every question put to him when he testifies on Monday in the grand jury investigation into his relationship with Monica S. Lewinsky, a White House spokesman indicated today./Some television commentators and essayists have speculated that Mr. Clinton might choose to invoke constitutional protections against compelled self-incrimination or invasion of privacy to prevent prosecutors from asking specific questions about his relationship with Ms. Lewinsky, a former White House intern.

---- INDEX REFERENCES ----

NAMED PERSON: CLINTON, BILL; LEWINSKY, MONICA
 KEY WORDS: SCANDALS; TESTIMONY; INVESTIGATIONS; ADULTERY; GRAND JURIES
 NEWS SUBJECT: Lifestyle; Law Enforcement (LIF LEN)
 NEWS CATEGORY: NEWS

Word Count: 73
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Thursday, August 13, 1998

NEWS

White House suggests Clinton plans to answer all questions
Judy Keen; Gary Fields

WASHINGTON

WASHINGTON -- The White House moved Wednesday to quell speculation that President Clinton might refuse to answer some questions when he testifies about Monica Lewinsky next week.

White House spokesman Joe Lockhart reiterated at the daily news briefing that Clinton intends to testify "completely and truthfully." Asked whether that means Clinton will not decline to answer certain questions, Lockhart said, "That's what it suggests to yes."

Clinton is scheduled to testify Monday under oath via closed-circuit TV from the White House. There has been speculation that he might assert his Fifth Amendment right not to incriminate himself or his Fourth Amendment right to privacy to avoid answering some questions about his relationship with the former White House intern.

Independent counsel Ken Starr is investigating whether Clinton had a sexual relationship with Lewinsky, lied about it under oath and asked others to conceal it. Clinton has denied the allegations.

Lewinsky testified last week to the grand jury that she did have an affair with Clinton and that they discussed ways to keep it secret, but that he did not directly ask her to lie, according to people with knowledge of her testimony.

Speculation is also mounting about a potentially critical piece of evidence: the dress being tested for DNA evidence. Lewinsky gave prosecutors the dark blue dress after she was given immunity from prosecution July 28.

Lockhart said Wednesday that he's not aware of any request from Starr for DNA samples from the president. Asked whether Clinton would like to know the results of the FBI tests, Lockhart said, "I

'13/98 USATD 04A

"I don't know." Other developments:

Justice Department lawyers are working with Starr's office to clear up an apparent discrepancy in the testimony of two Secret Service uniformed officers.

At issue are the recollections of officers John Muskett and Gary Byrne, people with knowledge of the matter said.

Those people say Muskett has told Justice Department lawyers that he and Harold Ickes, then deputy chief of staff, opened the door of the president's private study in early 1996 and saw Lewinsky leave the room. They also say Byrne has told the government lawyers that Muskett told him that he and Ickes saw Clinton and Lewinsky in an intimate situation.

Byrne and Muskett were unavailable for comment Wednesday. Ickes has said he never saw any sexual encounters between Clinton and Lewinsky.

Byrne and Muskett were among the first Secret Service personnel to appear before the grand jury after Supreme Court Justice William Rehnquist cleared the way last month for Secret Service officers and agents to be called.

Starr's office is preparing a report for Congress that may focus on evidence developed in the Lewinsky investigation.

Under the independent counsel act, Starr must report to Congress if he finds evidence of impeachable offenses by the president.

Other matters Starr has been reviewing, including the firing of travel office employees and the White House's acquisition of secret FBI background files, are not likely to produce evidence of impeachable offenses, people with knowledge of Starr's inquiry said.

Starr's report could be sent as early as next month, those people said, but no final decisions on its scope or findings have been made.

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PHOTO, b/w, AFP

---- INDEX REFERENCES ----

KEY WORDS: INVESTIGATION; PRESIDENCY; SCANDAL; WITNESS

GOVERNMENT: Executive (EXE)

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2497

Tab 71

tation
13/98 WASHPOST A04
8/13/98 Wash. Post A04
1998 WL 16549618

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The Washington Post
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Thursday, August 13, 1998

A Section

White House Rejects Suggestion Clinton Might Limit Testimony
Peter Baker
Washington Post Staff Writer

With unsolicited advice cascading in from all sides, the White House tried to stamp out speculation yesterday that President Clinton might not answer certain questions about Monica S. Lewinsky during his grand jury testimony Monday.

Despite Clinton's pledge to testify "completely and truthfully," some former advisers and legal analysts have suggested in recent days that he could limit his testimony, either by refusing to discuss his sex life or by giving a carefully worded statement on his relationship with Lewinsky without answering further questions.

But none of those scenarios comport with the president's pledge, according to aides who insisted they knew of no plans to follow such recommendations. Asked during the daily news briefing yesterday if Clinton was saying he would answer all questions when he vowed to testify "completely," White House deputy press secretary Joe Lockhart said, "That's what it suggests to me, yes."

Another senior official who did not want to be named said resisting some questions was not known to be under consideration, unless the president has discussed it with his personal attorney, David E. Kendall.

Clinton returned to Washington from a fund-raising trip early yesterday morning for what will be several days of intensive preparations with his lawyers, sessions that will extend into the weekend leading up to Monday's encounter with independent counsel Kenneth W. Starr at the White House.

Lockhart said that he could not say whether Clinton agreed with Hillary Rodham Clinton's comment this week attributing much of their problems to prejudice against Arkansas, but added that the president empathized with the view. "The president has heard that when he has gone home and I think he understands that," Lockhart said. Friends

13/98 WASHPOST A04

om there "feel like they were singled out because they were from Little Rock or they were from Arkansas."

The notion of restricting Clinton's testimony has some appeal among advisers who believe it could minimize his legal exposure in a way that could be politically defensible if couched in terms of privacy concerns. And yet while they publicly explore such options, nearly all of them have been kept out of the loop as Clinton limits his consultations to his private attorneys and the first lady -- virtually the only people he can talk with who would not be subject to subpoenas by Starr.

As a result, numerous suggestions offered during television appearances or in newspapers are not based on a full knowledge of the facts. "It's all just the inevitable chattering in this kind of pre-testimony buildup," said James E. Kennedy, of the White House counsel's office.

Much of the speculation appears based on confusion or disagreement about the definition of sex used in the Paula Jones case, in part because the publicly released portion of Clinton's deposition transcript does not include a full account of how the lawyers involved e to define the term. The definition is key to whether Clinton can e accused of perjury.

At the beginning of the Jan. 17 deposition, Jones's lawyers asked U.S. District Judge Susan Webber Wright to allow them to use a section of federal law to define the term "sexual relations" whenever it came up during the questioning. This was done for two reasons: to avoid having to ask the president salacious questions in explicit detail and to make clear to everyone exactly what was meant by the term "sexual relations."

The definition presented by Jones's lawyers included three parts: "For the purposes of this deposition, a person engages in 'sexual relations' when the person knowingly engages in or causes (1) contact with the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to arouse or gratify the sexual desire of any person; (2) contact between any part of the person's body or an object and the genitals or anus of another person; or (3) contact between the genitals or anus of the person and any part of another person's body. 'Contact' means intentional touching, either directly or through clothing."

Wright declined to accept the whole definition, deeming it too broad. Instead, according to an authoritative account, she limited it to the first point and excluded points two and three.

When Clinton was asked whether he had an affair with Lewinsky,

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to avoid confusion or ambiguity, Jones's attorney referred to the definition approved by the judge. Clinton lawyer Robert S. Bennett objected, saying he was not sure that the president could remember the definition.

"Well, it's real short," Wright responded. "I will permit the question and you may show the witness definition number one."

Shown that definition, Clinton then answered, "I have never had sexual relations with Monica Lewinsky. I've never had an affair with her."

----- INDEX REFERENCES -----

KEY WORDS: NATIONAL

EDITION: FINAL

Word Count: 778
8/13/98 WASHPOST A04
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2503

Tab 72

tation
8/13/98 WATIMES A1
8/13/98 Wash. Times (D.C.) A1
1998 WL 3455718

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WATIMES

The Washington Times
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Thursday, August 13, 1998

A

Clinton won't dodge questions about his sex life
Paul Bedard
THE WASHINGTON TIMES

President Clinton won't dodge questions about his sex life when he testifies to the Monica Lewinsky grand jury Monday, the White House said yesterday.

But his spokesman complained that the president's privacy has been violated.

"He plans to testify completely and truthfully," said deputy press secretary Joe Lockhart.

Asked whether Mr. Clinton will "answer every question" put to him by independent counsel Kenneth W. Starr and his deputies, Mr. Lockhart said, "Yes."

He said the president would not invoke his rights under the Fourth and Fifth Amendments to the Constitution, which protect citizens against unreasonable searches or self-incrimination.

"The president told you he'll answer truthfully and completely. I think that answers that question."

Speculation had blossomed that Mr. Clinton would refuse to answer questions about his sex life when he testifies from the White House via closed-circuit. He can expect to get questions about whether he engaged in oral and telephone sex with Miss Lewinsky and then discussed with her ways to avoid admitting it.

Mr. Lockhart said that the president would repeat his denial that he had sexual relations with the 25-year-old former White House intern and also that he never asked her to lie.

The spokesman dampened speculation that the president would address the nation after giving his testimony. "I think his main priority right now is to go in and testify completely and

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uthfully."

Mr. Lockhart said the White House hopes the contents of his testimony aren't leaked. "If the rule of law is followed and the president decides not to discuss his testimony, then there shouldn't be any leaks."

Several Democrats have called on the president to reveal his testimony in a public address, but his advisers have pressed the president not to do that.

The topic has dominated many White House meetings on the subject, but there has been no decision on a post-testimony address to the nation or short statement by the president to the press.

One aide joked that the president could quell the controversy and end his nonstop fund-raising campaign planned for the fall by "putting his testimony on pay per view. How about \$39.95?"

Mr. Clinton returned home early yesterday from a two-day campaign fund-raising trip and began preparing for his testimony, slated to last from shortly after 9 a.m. Monday to late afternoon. He is expected to leave Monday night for a two-week vacation in Martha's Vineyard, an island off the Massachusetts coast.

While the White House refused to detail his preparations or preview his testimony, his spokesman expanded on the first lady's attacks on Mr. Starr by claiming the prosecutor is digging too deeply into the first family's privacy.

"One of the negatives is a loss of privacy and privacy within your family," said Mr. Lockhart. "I would find it hard to believe, having watched the last few months, that he wouldn't believe that there were new inroads to that privacy."

The president and first lady have often complained about their loss of privacy, and have expressed concerns about intrusions by reporters and especially photographers who have taken pictures of the two in private vacation moments.

But Mr. Lockhart said that those concerns won't prompt the president to duck sensitive questions about his private life if asked by Mr. Starr and his team.

The White House endorsed Hillary Rodham Clinton's remarkable charge that Mr. Starr harbors a bias against Arkansas. Mr. Lockhart said the president thinks Mr. Starr dislikes the Clintons and that the investigation is driven by an anti-Clinton bias.

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'It's impossible for me . . . to separate the two. I am sure that there are some people who feel like they are treated unfairly because of their connection, or their friendship or their relationship, with the president. I am sure that there are others who feel that it's their connection to - whether the fact that they live in Little Rock or they're from Arkansas."

The first lady on Monday complained to the Arkansas Democrat Gazette of Little Rock that Mr. Starr's inquiry is driven by a "prejudice against our state . . . they wouldn't do this if we were from some other state."

Mr. Lockhart agreed, saying: "There have been a number of people who have little or no dealing with some of the matters that the independent counsel has looked at who've had their lives turned upside down and have run up legal bills. So I think there is a sentiment among some people back in Arkansas that they've been treated unfairly."

Mr. Starr, whose Whitewater investigation was set off by accusations by Arkansans, including the Clintons' former business partner, offered no comment yesterday.

Considerable time between today and Monday have been set aside for . Clinton to huddle with his lawyers and Harry Thomason, a Hollywood TV producer, in preparation for his testimony.

Mrs. Clinton also plans to provide advice. "She has some involvement," said the spokesman.

But Mr. Lockhart said only the president's lawyers - David Kendall, Nicole Seligman and Mickey Kantor - and his wife know what the president plans to say in his testimony.

"There is no loop," explained Lisa Caputo, Mrs. Clinton's former spokeswoman.

The White House is working to complete arrangements for the testimony. Previously taped Clinton depositions have taken place in the Map Room, the ground-floor room in the residence used by President Roosevelt for war councils during World War II.

---- INDEX REFERENCES ----

EDITION: 2

Word Count: 895

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Tab 73

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1998 WL 17010289

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Database
NEWSWEEK

Newsweek
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Monday, August 17, 1998

Vol. 132, No. 7, ISSN: 0028-9604

Monica On The Stand. (Monica Lewinsky's grand jury testimony)
Michael Isikoff Daniel Klaidman Karen Breslau

As Lewinsky tells her story to the grand jury, the president's team ponders how to fight back--in part, perhaps, by attacking the former intern's credibility. How ugly could it get?

David Kendall didn't waste time. When the news broke late last month that Monica Lewinsky had finally struck an immunity deal with Kenneth Starr, the president's lawyer began working the phones. He'd received an intriguing fax from a man named David Bliss, who said he had a story about Lewinsky that Kendall might want to hear. Kendall quickly faxed him back, thanking Bliss for sending the "very welcome" material "out of the blue." Kendall followed up with a phone call to Bliss, leaving a solicitous message--which Bliss played for Newsweek--on his answering machine. "I think it's important that we get together and, you know, decide how to proceed," Kendall said.

What did Bliss have on Lewinsky that was so tantalizing to the president's lawyer? Bliss, a drama-department shop foreman at Lewis & Clark College, told Kendall that when Lewinsky was a 21-year-old student there in 1995, she had forged a letter in his name on school stationery. Apparently Lewinsky was trying to help out Andy Bleiler, a married drama coach with whom she was allegedly having an affair. Bleiler was out of work, and embroiled in a custody battle. The forged letter--a purported job offer from Bliss to Bleiler--was supposed to help Bleiler's case. But the scheme went bad when the letter--which Bleiler says he never knew about--was returned to Bliss's mailbox as undeliverable. Bliss immediately suspected Lewinsky, who had been pestering him relentlessly to find work for Bleiler. Confronted with the letter, she proclaimed herself "humiliated," and begged forgiveness. But Bliss wasn't the forgiving kind. He took his story to Kendall. (A lawyer for Lewinsky declined to comment.)

The president's lawyer was all ears. Now that Lewinsky has become a fully immunized witness for the prosecution, Kendall is looking for details that might enable him to undermine Monica's credibility. Last week Lewinsky spent six hours before the grand jury in Washington.

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ere, under oath, she apparently contradicted the president's denials--both in his Paula Jones deposition and to the country--that the two had a sexual affair. The basics of Lewinsky's testimony began leaking to the press soon after she left the courthouse. The former intern reportedly admitted to more than a dozen sexual encounters with the president--and said that she and Clinton discussed how to conceal their relationship. But on the question of whether Clinton explicitly asked her to lie under oath, Lewinsky refused to testify that the president instructed her to perjure herself.

As Kendall prepares his legal counteroffensive--and with Clinton's Aug. 17 testimony just a week away--there are obstacles everywhere. Any lawyer's biggest fear is a surprise question that leaves his client befuddled and in danger of falling into a perjury trap. This is exactly what Kendall is up against. The biggest unknown, and one that could conceivably wreck all of Kendall's careful preparation, is the blue dress currently undergoing testing at the FBI lab. Does it contain "DNA evidence"? The crime lab may have already completed initial tests. But the end results--and whether Starr will ask the president for a DNA sample--are being tightly held. If the tests come back positive, and the results are linked to Clinton, anything Kendall might have dug up to discredit Lewinsky might be rendered irrelevant. But Kendall doesn't have the luxury of knowing what those tests will reveal. The best he can do is prepare his case--and his client--and get ready for the worst.

Meanwhile, Starr's staff is moving rapidly to complete its probe and may submit a possible report to Congress by early September. Contrary to expectations that Starr would present evidence of a broad pattern of obstruction of justice, Newsweek has learned the report will focus only on the Lewinsky matter and other allegations flowing out of the Paula Jones case. After four years and more than \$40 million, the independent counsel has won a string of Whitewater criminal convictions and still has two indictments pending. But whatever evidence Starr has developed against the president relating to Whitewater--and other matters such as the Travel Office affair and the FBI file scandal--sources say it is not strong enough to be included in an impeachment report. The findings could potentially cut both ways. The narrow scope of the report will allow White House spinners to denigrate Starr's entire probe as little more than a sexual inquisition. But a tightly focused report could present problems for the White House--laying out the lurid Lewinsky charges in stark and simple language that may be difficult to dispute.

No matter what Starr's report reveals, Kendall's immediate problem remains the same: how to make Clinton appear more credible than Lewinsky. One option: do "oppo" research on the chief accuser. Before Lewinsky reached an agreement with Starr, Kendall tread lightly on her to avoid pushing her into the independent counsel's camp. Since she's cut her deal, however, Kendall is no longer restrained. For now,

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a lawyer is keeping potentially damaging stories in his briefcase. But they could prove useful to him during possible impeachment hearings, where Democrats loyal to the president would get the chance to interrogate the former intern.

Kendall's Lewinsky digging isn't confined to Monica's Lewis & Clark days. He is also interested in the story of a Democratic activist from Indianapolis named John Sullivan, who recalled meeting Lewinsky at an October 1996 fund-raiser in Washington. As he waited along the rope line to shake Clinton's hand, Sullivan says he was pulled aside by an event organizer. She told him that the woman standing next to him was named Monica, and that Monica was infatuated with the president and may have fantasized about having a relationship with him. Would Sullivan keep an eye on her? The incident came to light last week when an Indianapolis TV reporter saw a tape of the event and recognized Sullivan--who then told his story to the reporter. Sullivan told Newsweek Kendall called him last week and asked about the event. Sullivan says the smooth lawyer, himself an Indiana native, played up his Hoosier roots to try to win Sullivan's trust.

Soft-spoken and camera averse, Kendall has a reputation as a gentleman lawyer. But he is a tenacious and crafty litigator with a reputation for tying his opponents in knots. Starr has already gotten a taste of Kendall's tactics. When the president's lawyer petitioned the courts to investigate the independent counsel's alleged grand-jury leaks to the press, it was seen as a somewhat desperate publicity stunt. But last week it was revealed that Judge Norma Holloway Johnson came down on Kendall's side--ruling that there probably were illegal leaks, and ordering Starr to prove his office wasn't the source. Last week a federal appeals court handed Starr one minor victory on the matter: it denied Kendall the opportunity to interrogate Starr's prosecutors about the leaks. Still, Johnson's decision was a blow to the independent counsel, and gives new ammunition to the White House spin team that Starr is out of control.

In public, the president is trying to rise above the legal imbroglio. After the embassy bombings in Africa last Friday, Clinton solemnly vowed to bring the terrorists to justice. This week, as the flag-draped coffins arrive home, the president will have other opportunities to emphasize statecraft over scandal. But those who saw Clinton last week after hours described him as burdened and withdrawn, rubbing his eyes and staring absently into space.

It's up to Kendall to take his dispirited client and transform him into a compelling, telegenic and credible witness. He's done it before. When Clinton gave videotaped testimony in previous Whitewater trials, jurors said they were "beguiled" by the president's performance. But trying to explain an alleged affair is a taller order. Kendall is legendary for exhaustive preparation sessions in which he grills his

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ments over and over, day after day, making them repeat their answers. In a case this complex, with so many possible hidden traps, that means the president and his lawyer will be spending plenty of quality time--and billable hours--together this week. The drill has already begun. In the mornings--and sometimes again in the evening--Kendall and his partner Nicole Seligman slip into the White House. They use the East Entrance to the private quarters, avoiding the cameras along the West Wing driveway. There, in Clinton's second-floor office overlooking the South Lawn, Kendall methodically runs through the evidence, asking the president to explain everything from Lewinsky's White House visits to her high-powered job search. There are usually only two others allowed in the room: Hillary Clinton and Mickey Kantor, another private lawyer.

No matter how thoroughly Kendall preps his client, however, he can't anticipate every question the special prosecutor might ask. Even Starr doesn't have all the answers. For months, for example, there have been numerous hazy press reports that a uniformed Secret Service officer witnessed an alleged encounter between Clinton and Lewinsky. The story has changed over time, and the details remained sketchy. A Newsweek reconstruction of the events may shed some light on the incident. On Easter Sunday 1996, according to government lawyers, officer John Muskett was stationed outside the Oval Office. A phone call came in for the president, but Clinton didn't respond. Muskett couldn't locate the president. Spotting Harold Ickes, Muskett asked the then deputy chief of staff for help. They knocked on the door to the Oval Office, but got no response. They then went to the door of the president's nearby private study. They knocked again, then opened the door.

What happened next is a matter of some controversy. Muskett later told Secret Service and Justice Department lawyers that he merely saw Lewinsky emerge from the room Clinton was in. But a fellow Secret Service officer, Gary Byrne--who wasn't present that day--told the government lawyers a different version. He said Muskett had told him that when they opened the door, Lewinsky's head was in Clinton's lap. Muskett has denied Byrne's account. And Ickes says he doesn't recall any aspect of the story. But sources tell Newsweek it was likely this incident that prompted Byrne to warn senior Clinton aide Evelyn Lieberman that Lewinsky was hanging around the Oval Office, and might be a potential problem. Shortly afterward, Lewinsky was transferred out of the White House to a job at the Pentagon. Now, Newsweek has learned, Starr's prosecutors, confronted with the contradictory accounts, want Justice Department officials to tell them what they were told in their interviews with Muskett and Byrne. Justice might agree to do so as early as this week. (Neither Muskett nor Byrne would comment to Newsweek.)

With a week to go, Clinton aides are doing their best to conduct business as Usual. This week Clinton will crisscross the country

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Using money for congressional Democrats and presiding over official White House "message events" wherever Air Force One touches down--touting voter favorites like the patients' bill of rights, clean-water laws and gun control.

But Clinton's mind may be elsewhere. Last week the president and First Lady invited a group of youth-violence experts to a cozy dinner in the Blue Room of the White House. There they hashed over the latest social theories about juvenile-crime prevention. According to some guests, Clinton, who normally revels in after-hours work sessions, seemed at times detached and weary. He faded in and out of the conversation, and was difficult to engage. Mrs. Clinton carried the dinner for both of them. She eagerly took notes and peppered the assembled academics and religious leaders with detailed questions. At the end of the evening, after most of the guests had departed and the First Lady had gone upstairs, Clinton lingered with Harvard professor Cornel West and a few others. How can you maintain your faith in the system when "right-wing gangsters in ties" seem intent on tearing you down? West asked the president. "They've been at me for a long time," Clinton responded. "I'm prepared." David Kendall certainly hopes so.

With Debra Rosenberg and Mark Hosenball

---- INDEX REFERENCES ----

NAMED PERSON: MONICA LEWINSKY

KEY WORDS: OBSTRUCTION OF JUSTICE SCANDALS

Word Count: 2009
8/17/98 NEWSWEEK 30
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Tab 74

2519



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Date: August 17, 1998

To: Mr. Kenneth W. Starr
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

FBI File No. 29D-OIC-LR-35063

Lab No. 980730002 S BO
980803100 S BO

Reference: Communication dated July 30, 1998 and evidence
submitted August 3, 1998

Your No. 29D-OIC-LR-35063

Re: MOZARK;
MC 106

Specimens received: July 30, 1998 and August 3, 1998

Specimens:

This report supplements two FBI Laboratory reports dated August 3, 1998 and August 6, 1998 and contains the results of the DNA-RFLP examinations.

This completes the requested examinations. The submitted items and the probed DNA membranes will be retained until retrieved by a representative of your organization. In addition to the evidence in the case, any remaining processed DNA from specimens examined by DNA analysis is also being returned to you. The processed DNA can be found in a package marked PROCESSED DNA SAMPLES: SHOULD BE REFRIGERATED/FROZEN. It is recommended that these samples be stored in a refrigerator/freezer and isolated from evidence that has not been examined.

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FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Report of Examination

Examiner Name:	[REDACTED]	Date:	08/17/98
Unit:	DNA Analysis 1	Phone No.:	202-324-4409
FBI File No.:	29D-OIC-LR-35063	Lab No.:	980730002 S BO 980803100 S BO

Results of Examinations:

Deoxyribonucleic acid (DNA) profiles for the genetic loci D2S44, D17S79, D1S7, D4S139, D10S28, D5S110 and D7S467 were developed from HaeIII-digested high molecular weight DNA extracted from specimens K39 and Q3243-1 (a semen stain removed from specimen Q3243). Based on the results of these seven genetic loci, specimen K39 (CLINTON) is the source of the DNA obtained from specimen Q3243-1, to a reasonable degree of scientific certainty.

No DNA-RFLP examinations were conducted on specimen Q3243-2 (a semen stain removed from specimen Q3243).

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CAUC - 7,870,000,000,000
SEH - 3,140,000,000,000
SWH - 943,000,000,000

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Tab 75

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By The Associated Press

Text of President Bill Clinton's address to the nation, as transcribed by the Federal Document Clearing House:

Good evening.

This afternoon in this room, from this chair, I testified before the Office of Independent Counsel and the grand jury.

I answered their questions truthfully, including questions about my private life, questions no American citizen would ever want to answer.

Still, I must take complete responsibility for all my actions, both public and private. And that is why I am speaking to you tonight.

As you know, in a deposition in January, I was asked questions about my relationship with Monica Lewinsky. While my answers were legally accurate, I did not volunteer information.

Indeed, I did have a relationship with Ms. Lewinsky that was not appropriate. In fact, it was wrong. It constituted a critical lapse in judgment and a personal failure on my part for which I am solely and completely responsible.

But I told the grand jury today and I say to you now that at no time did I ask anyone to lie, to hide or destroy evidence or to take any other unlawful action.

I know that my public comments and my silence about this matter gave a false impression. I misled people, including even my wife. I deeply regret that.

I can only tell you I was motivated by many factors. First, by a desire to protect myself from the embarrassment of my own conduct. I was also very concerned about protecting my family. The fact that these questions were being asked in a politically inspired lawsuit, which has since been dismissed, was a consideration, too.

In addition, I had real and serious concerns about an independent counsel investigation that began with private business dealings 20 years ago, dealings, I might add, about which an independent federal agency found no evidence of any wrongdoing by me or my wife over two years ago.

The independent counsel investigation moved on to my staff and friends, then into my private life. And now the investigation itself is under investigation.

This has gone on too long, cost too much and hurt too many innocent people.

Now, this matter is between me, the two people I love most - my wife and our daughter - and our God. I must put it right, and I am prepared to do whatever it takes to do so.

Nothing is more important to me personally. But it is private, and I intend to reclaim my family life for my family. It's nobody's business but ours.

Even presidents have private lives. It is time to stop the pursuit of personal destruction and the prying into private lives and get on with our national life.

Our country has been distracted by this matter for too long, and I take my responsibility for my part in all of this. That is all I can do.

Now it is time - in fact, it is past time - to move on. We have important work to do - real opportunities to seize, real problems to solve, real security matters to face.

And so tonight, I ask you to turn away from the spectacle of the past seven months, to repair the fabric of our national discourse, and to return our attention to all the challenges and all the promise of the next American century.

Thank you for watching. And good night.

Tab 76

The Washington Post

8/18/98

I Mised People. . . . I Deeply Regret That'

Federal Document Clearing House

Following are President Clinton's remarks last night on his grand jury testimony and the investigation by independent counsel Kenneth W. Starr.

Good evening. This afternoon in this room, from this chair, I testified before the Office of Independent Counsel and the grand jury. I answered their questions truthfully, including questions about my private life, questions no American citizen would ever want to answer.

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Thank you for watching. And good night.

Tab 77



**OFFICE OF THE ATTORNEY GENERAL
FACSIMILE TRANSMITTAL COVER SHEET**

DATE: AUGUST / 24 / 1998

TO: JACKIE BENNETT

FACSIMILE NO. 514-8802

TELEPHONE NO. 514-8688

FROM: GARY GRINDLER

FACSIMILE NO. 616-5117

TELEPHONE NO. 514-8283

NUMBER OF PAGES INCLUDING COVER SHEET 8

COMMENTS:

DRAFT - August 19, 1998 [5:00 p.m.]

This letter sets forth the terms of agreement between the Department of Justice (Department), the Secret Service, and the Office of Independent Counsel (OIC) regarding the OIC's desire to obtain information from Secret Service personnel that is relevant to its Monica Lewinsky-related investigation. This agreement is designed to facilitate the OIC's information-gathering process and, at the same time, to ensure that the Department and the Secret Service are discharging their law enforcement responsibilities in an appropriate manner.

I. Obtaining Information from Secret Service Personnel Not Previously Examined by the OIC

1. The OIC agrees to limit the questioning of additional Secret Service personnel by seeking information only from those agents and officers who served in a protective capacity in the vicinity of the Oval Office on six specified dates, during specified times. The Secret Service has identified 87 current and 2 retired agents and officers who served in such a capacity.¹ The OIC agrees not to seek information from agents and officers who served in a protective capacity on different dates, unless, in the future, it receives new information that provides probable cause to believe that evidence of a crime would be obtained by increasing the number of dates above six or speaking to additional Secret Service employees about events that occurred on dates other than the original six specified dates. The OIC agrees that prior to increasing the number of dates above six or speaking to additional Secret Service employees about events that occurred on dates other than the original six specified dates, the OIC will provide its basis for doing so, consistent with its obligations under Rule 6(e) of the Federal Rules of Criminal Procedure, to the Attorney General and Director Merletti, who, along with Kenneth W. Starr (and such other personnel as each may designate), will enter into good faith discussions on the need to increase the number of dates. If agreement cannot be reached on the need to increase the number of dates, the dispute will be presented to Chief Judge Johnson for resolution.

¹ To select such personnel, the Secret Service identified: (i) from official records the Uniformed Division personnel who were listed as occupying the posts specified by the OIC for the six specified time periods; (ii) from Protective Operations Activity and Personnel reports the Presidential Protective Division personnel who, for the six specified time periods, were listed as being assigned to the immediate shift protecting the President; and (iii) in an effort to be over inclusive rather than under inclusive, from Protective Operations Activity and Personnel reports the Presidential Protective Division personnel who, for the six specified time periods, were listed as being assigned to a specific Secret Service command center or were listed as participating in orientation.[deletion]

2. As promptly as possible, the Secret Service will require each of the 87 current agents and officers to complete the questionnaire attached at Tab A. Each current agent and officer will be required to swear to the contents of the questionnaire under penalty of perjury. After completing the questionnaire, the agents and officers will be directed to place the completed questionnaire in an envelope, seal the envelope, and send the envelope to the OIC. The OIC agrees that the questionnaire does not need to be sent to one of the two retired officers due to the OIC's prior contact with that officer. As for the other retired officer, the Secret Service will mail the questionnaire and a modified cover letter (attached at Tab B) to his last known mailing address.

3. The OIC agrees that the information provided by agents and officers in the questionnaires will be treated as sensitive and confidential information. At the Department's request, the OIC will provide the Department with copies of the completed questionnaires.
4. The OIC is entitled, in its sole discretion, to interview any agent or officer who does not answer each of the queries on the questionnaire in the negative. Consistent with past practice, prior to the OIC interviews, Department and Secret Service attorneys may, at their discretion, meet with any such agent or officer for the sole purpose of ascertaining whether the agent or officer possesses potentially relevant information that is covered by a currently-recognized testimonial privilege or otherwise implicates sensitive information about Secret Service security measures.
5. The OIC interviews will be conducted in the offices of the OIC in the presence of OIC attorneys and/or an FBI agent. [Jackie-we need to discuss this paragraph] Attorneys from the Department or the Secret Service may, at their discretion, accompany the agents and officers to the interviews and be available outside the interview room for consultation. The OIC agrees that the information provided by agents and officers in the interviews will be treated as sensitive and confidential information.
6. The OIC is entitled, in its sole discretion, to depose under oath any agent or officer who it has interviewed. These depositions, which shall not be videotaped, will be conducted in the offices of the OIC in the presence of OIC attorneys and a stenographer. Attorneys from the Department or the Secret Service may, at their discretion, accompany the agents and officers to the depositions and be available outside the deposition room for consultation. The OIC agrees that the information provided by agents and officers in the depositions will be treated as sensitive and confidential information.
7. The OIC agrees that it will not examine before the Grand Jury any agent or officer who it has interviewed in the absence of prior consultations in good faith between Kenneth W. Starr, Lewis C. Merletti and the Attorney General (and such other

personnel as each may designate). [The last sentence of this paragraph has been deleted]

II. Obtaining Information from Department Attorneys Regarding Secret Service Personnel Previously Examined by the OIC

1. The Department agrees to proffer orally to OIC attorneys information covered by the putative protective function privilege, which Department attorneys previously obtained during interviews of Secret Service officers.
2. The OIC agrees that the proffers will be treated as **sensitive and confidential information**.

III. General Agreements

1. The OIC agrees that, by adhering to the procedures described above, the Department and the Secret Service do not waive any possible claim of government attorney-client privilege, work product privilege, or protective function privilege.
2. The OIC agrees that the procedures outlined above will be the exclusive method by which the OIC henceforth obtains information from Department, Secret Service, or Treasury Department attorneys, agents, officers and personnel, unless the OIC receives new information that provides it with probable cause to believe that it would obtain new evidence of obstruction of justice, perjury, or making false statements arising from the OIC's efforts to obtain information from Secret Service personnel.
3. The OIC agrees that this exclusive method of obtaining information from Department of Justice, Treasury and Secret Service personnel obviates the need for the production of additional materials pursuant to any document subpoena served upon the Secret Service prior to the date of this agreement. The OIC, however, reserves the right to serve document subpoenas in the future for additional information deemed by the OIC as necessary to the grand jury investigation.
4. Attorneys from the Department, the Secret Service, or the Treasury Department who have obtained, or will obtain, information from the OIC or Secret Service agents and officers as a result of the procedures outlined above will, consistent with past practice, maintain that information as **sensitive and confidential** and restrict its dissemination only to those who have a compelling need to know it within the Department, the Secret Service, and the Treasury Department.

5. The parties to this agreement understand that, at any time in this process, including prior to completing the questionnaire, Secret Service personnel are entitled, at their discretion, to retain private counsel. OIC recognizes that private counsel who may be retained by Secret Service personnel in this matter are not parties to this Agreement and, accordingly, involvement by such counsel could result in proposals by them to modify the manner in which information from their individual clients will be provided to the OIC.
6. Should a dispute arise regarding the interpretation or application of the terms of this Agreement, the OIC, the Department and Secret Service agree that Kenneth W. Starr, Lewis C. Merletti and the Attorney General (and any such other personnel as each may designate) will engage in good faith consultations in an effort to resolve any such dispute. If any such dispute can not be resolved, the issues will be presented to Chief Judge Johnson for resolution.

[Memorandum to select Secret Service personnel:]

Independent Counsel Kenneth W. Starr has been authorized to investigate "whether Monica Lewinsky or others suborned perjury, obstructed justice, intimidated witnesses or otherwise violated federal law . . . concerning the civil case Jones v. Clinton." As part of that investigation, the Office of the Independent Counsel (OIC) is attempting to ascertain whether Secret Service officers or agents who worked in a protective capacity on a limited number of dates, during specified times, are in possession of information that may be relevant to its investigation. The OIC, the Department of Justice, and the Secret Service have agreed to a multi-step information-gathering process.

You have been identified as a Secret Service agent or officer who worked in a protective capacity on the list of dates and times that have been provided by the OIC. To determine whether you possess information that is relevant to the OIC's investigation, you are required to complete the attached questionnaire within three days of receiving it. Your responses to the questionnaire must be sworn to under penalty of perjury.

If you have any questions regarding the questionnaire, you may consult with attorneys from the Secret Service Office of Chief Counsel, at (202) 435-5771. Please note that these attorneys cannot represent you in your personal capacity, but would be representing the United States and its interests that may be implicated by the OIC's inquiry. As with any other potential witness, you have the right to retain private counsel at any time, including prior to completing the questionnaire. If you do retain private counsel, the Department of Justice will consider a request for reimbursement of private counsel fees, which will be authorized if the Department determines, in its sole discretion, that your request is in the interests of the United States.

The OIC has advised us that your responses to the questionnaire **will be treated as sensitive and confidential**. After you have completed the questionnaire, place it in the enclosed envelope, seal the envelope, and mail it to the OIC. Please be advised that, depending upon your answers to the questionnaire, the OIC may elect to interview you and/or obtain your testimony under oath, either in its offices or in front of the Grand Jury. Should the OIC elect to do so, the Secret Service Office of Chief Counsel will contact you individually to inform you of this fact and of how the OIC's information-gathering process will proceed from that point.

QUESTIONNAIRE

1. Print your full name.

2. Do you recall ever speaking with Monica Lewinsky?

Yes _____ No _____

If your answer to this question is "Yes," but your conversations with Monica Lewinsky were limited to the exchange of casual greetings or idle chit-chat about matters such as the weather, please describe those conversations on a separate page.

3. Do you recall, prior to January 21, 1998, ever observing Monica Lewinsky via a Secret Service video camera or closed-circuit monitoring device?

Yes _____ No _____

4. Do you recall, prior to January 21, 1998, ever observing Monica Lewinsky and President Clinton together?

Yes _____ No _____

If your answer to this question is "Yes," but your observations with Monica Lewinsky and the President were limited to those at widely-attended events, please describe those observations on a separate page.

5. Do you recall, prior to January 21, 1998, ever observing Monica Lewinsky inside, or in the vicinity, of the Oval Office suite of offices?

Yes _____ No _____

If your answer to this question is "Yes," but your observations with Monica Lewinsky and the President were limited to those at widely-attended events, please describe those observations on a separate page.

6. Do you recall, prior to January 21, 1998, ever hearing the President, any current or former White House or Secret Service employee, or any advisor or visitor to the White House

(excluding President Clinton's private attorneys), speak about or discuss any one of the following five topics: (i) a relationship between Monica Lewinsky and the President; (ii) Monica Lewinsky being alone with President Clinton at any location; (iii) Monica Lewinsky being inside, or in the vicinity, of the Oval Office suite of offices; (iv) Linda Tripp; or (v) any matter related to President Clinton, Monica Lewinsky, Linda Tripp, or Kathleen Willey being deposed, submitting affidavits, being a witness in, or otherwise being connected with the Paula Jones v. William Jefferson Clinton litigation?

Yes _____ No _____

I declare under penalty of perjury, pursuant to 28 U.S.C. Section 1746, that the foregoing is true and correct.

Signature

Date

Tab 78

Memorandum**Office of the Independent Counsel**

To: File**Date:** 8/27/98**From:** SA [REDACTED]**Subject:** Lewinsky interview on 8/13/98

During the 8/13/98 interview of Monica S. Lewinsky, Lewinsky asked if she could discuss a particular matter outside the presence of male investigators/attorneys. Associate Independent Counsel (AIC) Karin Immergut obliged Lewinsky, and the two left the interview room. After a few minutes, the two returned and the interview resumed. The contents of the interview of 8/13/98 are documented in an FD-302, transcribed on 8/14/98 by writer.

After the interview, AIC Immergut advised writer as to the details of what Lewinsky discussed outside the presence of investigators. Immergut advised that Lewinsky stated that during her November 13, 1997 meeting with Clinton, Lewinsky showed Clinton an e-mail. The e-mail described the [REDACTED]. Lewinsky also brought some Altoids with her and was eating them when she met with Clinton. Clinton told Lewinsky they did not have enough time for oral sex. Lewinsky told Clinton to at least put his tongue on hers and he obliged.

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Tab 79

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LAW OFFICES
WILLIAMS & CONNOLLY

725 TWELFTH STREET, N.W.

WASHINGTON, D. C. 20005-5901

(202) 434-5000

FAX (202) 434-5029

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

DAVID E. KENDALL
(202) 434-5145

August 31, 1998

CONFIDENTIAL

RULE 6(e), F.R.CRIM.P. GRAND JURY SUBMISSION

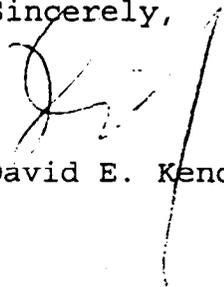
Robert J. Bittman, Esq.
Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004

By Hand

Dear Bob:

This will acknowledge your letter dated August 26, 1998. I believe that the President has complied with grand jury subpoenas nos. V002 and D1415. I will not repeat the comments of my letter to you dated April 13, 1998. As I have previously told you, the President receives a large number of gifts from a great many people. We have done our very best to comply with the grand jury subpoenas. I want to repeat, however, that if you have information concerning gifts or other objects which you think may be responsive to these subpoenas, and if you will give me a description of what those gifts or other objects might be, we will be happy to undertake a search for them, as we have in the past.

Sincerely,


David E. Kendall

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Tab 80

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Memorandum

Office of the Independent Counsel

To: FILE

Date: 9/7/98

From: Edward J. Page, AIC *elap*

Subject: Interview of USSS Special Agent Thomas M. Powers

AICs Mary Anne Wirth and Edward J. Page interviewed Thomas M. Powers, United States Secret Service Special Agent on 2 August 1998 at United States Secret Service (USSS) Headquarters in Washington, D.C.

Powers has worked for the USSS since June of 1986 and has been assigned to the Presidential Protective Detail (PPD) for approximately four years and two months.

Powers has seen President and Betty Currie talking during his PPD duties at the White House and has seen Currie go to the putting green to give the President messages.

Powers saw Betty Currie at the White House on Saturday, January 17, 1998, the day of President Clinton's deposition in Jones v. Clinton, and heard the President and Currie talking. Powers saw the President after he returned from his deposition; in Powers's opinion, President Clinton, who was by himself at the time, "looked angry, concerned and troubled."

Powers knows USSS Special Agent Nelson Garbitto, who also works on the PPD. Powers described Garbitto as follows: Hispanic, possibly of Puerto Rican descent, 6 ft. 2 or 3 inches in height, dark skinned, black hair, and tall and slender.

Powers has never seen Monica Lewinsky at the White House.

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Tab 81

(Cite as: 1998 WL 551961 (E.D.Ark.))

Paula Corbin JONES, Plaintiff,
v.
William Jefferson CLINTON and Danny Ferguson,
Defendants.

No. LR-C-94-290.

United States District Court,
E.D. Arkansas,
Western Division.

Sept. 1, 1998.

MEMORANDUM AND ORDER

SUSAN WEBBER WRIGHT, District Judge.

*1 On May 6th, 1994, the plaintiff in this case, Paula Corbin Jones, filed suit against William Jefferson Clinton, President of the United States, and Danny Ferguson, a former Arkansas State Police Officer, seeking damages for alleged actions beginning with an incident that is said to have occurred in a hotel suite in Little Rock, Arkansas, on May 8th, 1991. The case ultimately made its way to the Supreme Court of the United States where it was determined that plaintiff's lawsuit could proceed while the President is in office. See *Clinton v. Jones*, 520 U.S. 681, 117 S.Ct. 1636, 137 L.Ed.2d 945(1997). Following that decision, and following this Court's partial denial of the President's and Ferguson's subsequent motion for judgment on the pleadings, see *Jones v. Clinton*, 974 F.Supp. 712 (E.D.Ark.1997), formal discovery commenced. Because of the salacious nature of much of the discovery and the media's intense and often inaccurate coverage of this case, this Court, on October 30th, 1997, entered a Confidentiality Order on Consent of all Parties, thereby imposing limits on the dissemination of information concerning a large portion of discovery and placing under seal court filings dealing with discovery. The Court took this action to help ensure that a fair and impartial jury could be selected in the event this matter went to trial by limiting prejudicial pre-trial publicity. Following entry of the Confidentiality Order, various media entities filed a Motion for Leave to Intervene, Motion to Modify and/or Rescind Confidentiality Order and Motion for Access to Court Records and Discovery. [FN1] Other parties also sought rescission of the Confidentiality Order and for access to Court records and discovery. By

Memorandum and Order dated March 9th, 1998, this Court denied the motions seeking to rescind and/or modify the Confidentiality Order. In its Memorandum and Order, the Court pointed out the need to ensure a fair trial and, further, that there existed a need to protect the privacy interest of third-party witnesses pursuant to Fed.R.Civ.P. 26(c). [FN2] The media entities appealed. Following the filing of the notice of appeal but before the Court of Appeals for the Eighth Circuit could issue an opinion on the matter, this Court granted the President's and Ferguson's motions for summary judgment and entered judgment dismissing this case. See *Jones v. Clinton*, 990 F.Supp. 657 (E.D.Ark.1998). The Eighth Circuit subsequently issued an order dismissing the media entities' appeal and directing this Court to consider on remand the need for keeping its Confidentiality Order in place in view of the grant of summary judgment. See *Jones v. Clinton*, 138 F.3d 758 (8th Cir.1998). The Eighth Circuit's mandate was filed in this Court on June 3rd, 1998. In accordance with the Order of the Eighth Circuit, this Court, by Order dated June 8th, 1998, asked the parties to file briefs setting forth their positions, if any, on the need for keeping in place the Confidentiality Order. Following submission of the briefs outlining the parties' respective views, this Court, by Memorandum and Order dated June 30th, 1998, vacated in large part the Confidentiality Order and directed that a substantial portion of the record in this matter be unsealed. In so ruling, the Court determined that the Confidentiality Order shall remain in effect with respect to the identities of any Jane Does who may be revealed in the Court record, in any materials in possession of the parties that have not been filed of record, and in any public statements. In addition, the Court determined that all videotapes of depositions taken in connection with this lawsuit shall remain under seal. Now before the Court is a motion by the President for reconsideration of this Court's decision to partially unseal the record and to stay the June 30th Memorandum and Order. The plaintiff and the media have responded to the President's motion and the President has filed a reply to the plaintiff's and the media's responses. Having considered the matter, the Court grants in part and denies in part the President's motion for reconsideration.

I.

*2 The President argues that this Court should

reconsider the June 30th, 1998 Memorandum and Order because this Court may not have been aware of all the discovery material that remains under seal, much of which he says was not filed with the Court or attached to any motion; there is no right of access to the material at issue; the parties' fair trial interests would be prejudiced and that prejudice cannot be mitigated by the passage of time; the privacy interests protected are too narrow; and unsealing would permit plaintiff, the media and others to misuse the Court's processes and Court files for profit or political gain.

In response, the media entities argue that the President's motion raises no new issues and should be denied for that reason alone. They further argue that this Court's order represented a proper exercise of its discretion in balancing privacy rights against the interest of the media and the public in full and accurate disclosure of the history of this case and the course of the discovery process, and that there is no basis for the President's contention that much of the record in this litigation over serious allegations of official misconduct should be concealed from public view long after any circumstances require it.

For her part, the plaintiff has altered her previous position on the matter and now argues for the complete unsealing of the record. [FN3] She argues that it is in the best interests of all parties concerned, as well as the rights of the public and media, to disclose all the discovery and evidence relating to the case at this time, with the single exception of the identifying testimony relating to a certain Jane Doe. Plaintiff further argues that this Court has enunciated no rational justification for retaining the seal on videotapes of deposition testimony and that the Court's Order with regard to the videotapes constitutes a taking of her property without just compensation or due process pursuant to the Fifth and Fourteenth Amendments.

II.

At issue are three categories of materials: (1) court filings that are under seal; (2) discovery materials in the hands of the parties that are not filed with the Court but are nevertheless under seal as subject to the Confidentiality Order; and (3) videotaped and transcribed depositions. [FN4] The Court will address these categories in turn.

1.

With respect to the first category of materials--court filings that are under seal--the Court has determined that there are contained in the Court's files matters under seal which do not at this time impact upon the parties' rights to a fair trial or the interests of the Jane Does in maintaining privacy, two interests for implementation of the Confidentiality Order. In that regard, the Court will review all materials on file with the Court and will release on a periodic basis such materials, either in whole or as redacted, that the Court determines will not (1) impact upon the parties' rights to a fair trial and/or (2) do not adversely affect the privacy interests of any Jane Does. In releasing such materials, the Court will attempt to ascertain the negative inferences any such materials may have on one party or the other and will attempt, where possible, to coordinate the release of such materials on equal basis. The Court will not, however, release any materials involving Jane Does, whether in whole or as redacted, without first giving those Jane Does and the parties an opportunity to object to their release. While the President may be correct that such review and/or redaction of the record prior to release may prove to be a burdensome task, this Court must follow its duty notwithstanding the difficulty of any particular course of action.

2.

*3 With respect to the second category of materials--discovery materials in the hands of parties that are not filed with the Court but are nevertheless under seal as subject to the Confidentiality Order--the Court directs that no such materials in the hands of the parties be released or otherwise disclosed without first obtaining Court approval. In approving the release of any materials, whether in whole or as redacted, the Court will utilize the test previously enunciated, i.e. whether the release of any such materials impacts upon the parties' rights to a fair trial and/or whether such materials adversely affect the privacy interests of any Jane Does.

3.

With respect to the third and final category of materials--the videotaped and transcribed depositions of the parties--the Court will maintain under seal the videotapes of any depositions taken in connection

--- F.Supp.2d ----

(Cite as: 1998 WL 551961, *3 (E.D.Ark.))

with this lawsuit, whether they be videotapes of the parties or of non-party witnesses. As the Court has previously noted, the videotapes of the depositions are not judicial records to which any common law right of public access attaches and, with respect to the President, there is a strong judicial tradition of proscribing public access to recordings of testimony given by a sitting President. See *United States v. McDougal*, 103 F.3d 651, 656-659 (8th Cir.1996), cert. denied, --- U.S. ----, 118 S.Ct. 49, 139 L.Ed.2d 15 (1997).

With respect to transcripts of the depositions of the parties, however, the Court will permit these transcripts to be released in their entirety provided, however, that all identifying information of any Jane Does has been redacted and the redaction has been approved by the Court. It should be noted that the plaintiff and Ferguson do not object to their depositions being released in their entirety. Although the President does object, his deposition has largely been made public and has been the subject of intense scrutiny in the wake of his public admission that he was "misleading" with regard to his relationship with Monica Lewinsky. [FN5] That being the case, the Court determines that no fair trial interests are implicated by the release, as redacted and approved by this Court, of the transcripts of his or the other parties' depositions.

III.

Having set forth the procedure this Court will utilize in unsealing a large part of the record, the Court now addresses plaintiff's claim that she has a Fifth Amendment property interest in discovery materials, namely the videotapes of depositions which she noticed. Plaintiff cites no authority for such a proposition and, as correctly noted by the President, the Supreme Court has held that "[l]iberal discovery is provided for the sole purpose of assisting in the preparation and trial, or the settlement, of litigated disputes." *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 34, 104 S.Ct. 2199, 81 L.Ed.2d 17 (1984). Indeed, as a general matter, plaintiff would not have any right to the material at issue but for the discovery procedures set forth in the Federal Rules of Civil Procedure. The Court thus rules that plaintiff has no property interest in the discovery materials she has amassed.

*4 Likewise, the Court rejects any assertion by

plaintiff that this Court is impeding upon First Amendment interests in the discovery materials she has amassed in this case. See *Seattle Times*, 467 U.S. at 33-37 (holding that "restraints placed on discovered, but not yet admitted, information are not a restriction on a traditionally public source of information," and that "where a protective order is entered on a showing of good cause as required by Rule 26(c) [of the Federal Rules of Civil Procedure], is limited to the context of pretrial discovery, and does not restrict the dissemination of the information if gained from other sources, it does not offend the First Amendment").

IV.

One final matter concerns motions by two Jane Does to intervene and to reconsider the Court's June 30th, 1998 Memorandum and Order, both of which were filed for purposes of protecting their privacy interests, a motion by non-party deponent Dolly Kyle Browning for a Protective Order in which she requests that certain portions of her deposition transcript and exhibits remain sealed to protect the privacy of persons with little or no connection with the facts underlying this action and to preserve proprietary information, and a motion by the Office of Independent Counsel ("OIC") to maintain the confidentiality of its March 27th, 1998 filing, i.e., "In Camera Submission of the United States in Support of [the United States'] Motion for Limited Intervention and a Stay of Kathleen Willey's Further Deposition." The motions of the two Jane Does to intervene are granted. [FN6] Those portions of their motions to reconsider are granted to the extent set forth in today's Memorandum and Order. The motion of Dolly Kyle Browning for a Protective Order is granted as well. If and/or when the record in this matter is unsealed (either in whole or part), [FN7] the Court will address the concerns set forth in Ms. Browning's motion at that time. Finally, the Court grants OIC's motion and will maintain the confidentiality of its March 27th, 1998 filing, i.e., "In Camera Submission of the United States in Support of [the United States'] Motion for Limited Intervention and a Stay of Kathleen Willey's Further Deposition."

V.

The parties are hereby given until and including Tuesday, September 15th, 1998, in which to file a

(Cite as: 1998 WL 551961, *4 (E.D.Ark.))

notice of appeal from today's decisions. Assuming an appeal is filed, today's decision will be stayed in its entirety pending the resolution of any such appeal. If no appeal is filed, the Court will proceed to unseal the record as set forth above. All court filings unsealed in accordance with today's decision will be posted on the Court's website beginning on Monday, September 28th, 1998, at the following address: www.ark.uscourts.gov. Future documents unsealed in accordance with today's decision will be posted at the same address. Because it may be necessary for the Court to periodically have phone conferences to address any objections that may be raised to the release of a particular document, the Court cannot provide a precise schedule setting forth the times that any documents will be released. Accordingly, the Court will not announce any such postings in advance, and neither the Court nor the Clerk's Office will answer media inquiries about the timing of any such postings. The Court will be reviewing documents for possible unsealing and a barrage of calls could interfere with this process.

VI.

*5 For the foregoing reasons, the Court grants in part and denies in part the President's motion for reconsideration. The Confidentiality Order is hereby modified as set forth above. The motions of the Jane Does to intervene and to reconsider are granted to the extent set forth above, and the motions of Dolly Kyle Browning and OIC are granted as well.

IT IS SO ORDERED this 1st day of September, 1998.

FN1. The media entities that joined in this motion are as follows: Pulitzer Publishing Company, The New York Times Company; Associated Press, USA Today, a division of Gannett Satellite Information Network, Inc.; Cable News Network, Inc.; Newsday, Inc.; National Broadcasting Company, Inc.; CBS, Inc.; American Broadcasting Companies, Inc.; Time Inc.; Little Rock Newspapers, Inc.; and The Reporters Committee for Freedom of the Press. Following the filing of

this motion, two additional media entities, Fox News Network, LLC, and The Society of Professional Journalists, filed a motion seeking the same relief.

FN2. Rule 26(c) provides that "[u]pon motion by a party or by the person from whom discovery is sought ... and for good cause shown, the court in which the action is pending ... may make any order which justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense...."

FN3. Plaintiff initially took no position on the unsealing of the record but later submitted a pleading that argued for the need to keep in place the Confidentiality Order. In her most recent pleading, plaintiff withdraws her consent to the Confidentiality Order and argues for the complete unsealing of the record.

FN4. Portions the transcribed depositions of parties and various witnesses have been made part of the Court record by virtue of the briefing on the President's and Ferguson's motions for summary judgment, or by motions involving discovery issues. The latter motions currently remain under seal pursuant to the Confidentiality Order.

FN5. Although the Court has concerns about the nature of the President's January 17th, 1998 deposition testimony given his recent public statements, the Court makes no findings at this time regarding whether the President may be in contempt.

FN6. Because the Court is allowing all Jane Does the opportunity to object to the release of information which may affect their interests, the Court hereby sua sponte grants leave of all other Jane Does permission to intervene in this matter.

FN7. Assuming an appeal is filed, the Court will, of course, await the resolution of any such appeal prior to unsealing any part of the record in this case. See Section V, *infra*.

END OF DOCUMENT

2557

Tab 82

2558

Surfacing Lyrics

@1997 by Sarah McLachlan except as noted.

TRACKS: 1.) Building a Mystery 2.) I Love You 3.) Sweet Surrender 4.) Adia 5.) Do What You Have To Do 6.) Witness 7.) Angel 8.) Black and White 9.) Full of Grace 10.) Last Dance (Instrumental)

Building a Mystery
(Sarah McLachlan/Pierre Marchand)

You come out at night
That's when the energy comes
And the dark side's light
and the vampires roam

You strut your rasta wear
and your suicide poem
And a cross from a faith that died
Before Jesus came

You're building a mystery

You live in a church
Where you sleep with voodoo dolls
And you won't give up the search
For the ghosts in the halls

You wear sandals in the snow
And a smile that won't wash away
Can you look out the window
Without your shadow getting in the way

You're so beautiful
With an edge and charm
And so careful
When I'm in your arms

'Cause you're working
Building a mystery
Holding on and holding it in
Yeah you're working
Building a mystery
And choosing so carefully

You woke up screaming aloud
A prayer for your secret god
You feed off our fears
And hold back your tears oh

You give us a tantrum
And a know it all grin
Just when we need one



When the evening's thin

You're a beautiful
A beautiful fucked up man
You're setting up your
Razor wire shrine

I Love You

I have a smile
stretched from ear to ear
to see you walking down the road

we meet at the lights
I stare for a while
the world around disappears

just you and me
on this island of hope
a breath between us could be miles

let me surround you
my sea to your shore
let me be the calm you seek

oh and every time I'm close to you
there's too much I can't say
and you just walk away

and I forgot
to tell you
I love you
and the night's
too long
and cold here
without you
I grieve in my condition
for I cannot find the strength to say I need you so

oh and every time I'm close to you
there's too much I can't say
and you just walk away

and I forgot
to tell you
I love you
and the night's
too long
and cold here
without you

Sweet Surrender

It doesn't mean much
It doesn't mean anything at all
The life I've left behind me
Is a cold room

Surfacing Lyrics

I've crossed the last line
 From where I can't return
 Where every step I took in faith
 Betrayed me
 And led me from my home

Sweet surrender
 Is all that I have to give

You take me in
 No questions asked
 You strip away the ugliness
 That surrounds me
 Are you an angel
 Am I already that gone
 I only hope that I won't disappoint you
 When I'm down here on
 My knees

Sweet surrender
 Is all that I have to give
 Sweet surrender
 Is all that I have to give

And I don't understand
 By the touch of your hand
 I would be the one to fall

I miss the little things
 Oh I miss everything
 About you
 It doesn't mean much
 It doesn't mean anything at all
 The life I left behind me
 Is a cold room

Sweet surrender
 Is all that I have to give
 Sweet surrender
 Is all that I have to give

Adia
 (Sarah McLachlan/Pierre Marchand)

Adia, I do believe I failed you
 Adia, I know I've let you down
 Don't you know I tried so hard
 To love you in my way
 It's easy let it go

Adia, I'm empty since you left me
 Trying to find a way to carry on
 I search myself and everyone
 To see where we went wrong

There's no one left to finger
 There's no one here to blame

Surfacing Lyrics

There's no one left to talk to honey
And there ain't no one to buy our innocence

'Cause we are born innocent
Believe me Adia, we are still innocent
It's easy, we all falter
Does it matter?

Adia I thought that we could make it
But I know I can't change the way you feel
I leave you with your misery
A friend who won't betray
I pull you from your tower
I take away your pain
And show you all the beauty you possess
If you'd only let yourself believe that

We are born innocent
Believe me Adia, we are still innocent
It's easy, we all falter, does it matter?
Believe me Adia, we are still innocent
'Cause we are born innocent
Adia we are still
It's easy, we all falter
But does it matter?

Do What You Have to Do
(Sarah McLachlan/Coleen Wolstenholme)

What ravages of spirit
Conjured this temptuous rage
Created you a monster
Broken by the rules of love
And fate has lead you through it
You do what you have to do
And fate has led you through it
You do what you have to do

And I have the sense to recognize that
I don't know how to let you go
Every moment marked
With apparitions of your soul
I'm ever swiftly moving
Trying to escape this desire
The yearning to be near you
I do what I have to do
The yearning to be near you
I do what I have to do

But I have the sense to recognize
That I don't know how
To let you go
I don't know how
To let you go

A glowing ember
Burning hot

Burning slow
 Deep within I'm shaken by the violence
 Of existing for only you

I know I can't be with you
 I do what I have to do
 I know I can't be with you
 I do what I have to do
 And I have sense to recognize but
 I don't know how to let you go
 I don't know how to let you go
 I don't know how to let you go

Witness
 (Sarah McLachlan/Pierre Marchand)

Make me a witness
 Take me out
 Out of darkness
 Out of doubt

I won't weigh you down
 With good intention
 Won't make fire out of clay
 Or other inventions

Will we burn in heaven
 Like we do down here
 Will the change come
 While we're waiting
 Everyone is waiting

And when we're done
 Soul searching
 And we carried the weight
 And died for a cause
 Is misery
 Made beautiful
 Right before our eyes
 Will mercy be revealed
 Or blind us where we stand

Will we burn in heaven
 Like we do down here
 Will the change come
 While we're waiting
 Everyone is waiting

Angel

Spend all your time waiting
 For that second chance
 For a break that would make it okay
 There's always one reason
 To feel not good enough
 And it's hard at the end of the day
 I need some distraction

Oh beautiful release
 Memories seep from my veins
 Let me be empty
 And weightless and maybe
 I'll find some peace tonight

In the arms of an angel
 Fly away from here
 From this dark cold hotel room
 And the endlessness that you fear
 You are pulled from the wreckage
 Of your silent reverie
 You're in the arms of the angel
 May you find some comfort here

So tired of the straight line
 And everywhere you turn
 There's vultures and thieves at your back
 The storm keeps on twisting
 You keep on building the lies
 That you make up for all that you lack
 It don't make no difference
 Escaping one last time
 It's easier to believe
 In this sweet madness
 Oh this glorious sadness
 That brings me to my knees

In the arms of an angel
 Fly away from here
 From this dark cold hotel room
 And the endlessness that you fear
 You are pulled from the wreckage
 Of your silent reverie
 You're in the arms of the angel
 May you find some comfort here
 You're in the arms of the angel
 May you find some comfort here

Black and White

Unravel me
 A distant cord
 On the outside is forgotten
 A constant need
 to get along
 And the animal awakens
 And all I feel is black and white

The road is long
 The memory slides
 To the whole of my undoing
 I put aside
 I put away
 I push it back to get through each day
 And all I feel is black and white
 And I'm wound up small and tight

Surfacing Lyrics

And I don't know who I am

Everybody loves you when you're easy
 Everybody hates when you're a bore
 Everyone is waiting for your entrance so
 Don't disappoint them

Unravel me
 Untie this chord
 The very center of our union
 Is caving in
 I can't endure
 I am the archive of our failure
 And all I feel is black and white
 And I'm wound up small and tight
 And I don't know who I am

Everybody loves you when you're easy
 Everybody hates when you're a bore
 Everyone is waiting for your entrance so
 Don't disappoint them

Everybody loves you when you're easy so
 Don't disappoint them

Don't disappoint them

Full of Grace

The winter here's cold
 And bitter
 It's chilled us to the bone
 We haven't seen the sun for weeks
 Too long too far from home
 I feel just like I'm sinking
 And I claw for solid ground
 I'm pulled down by the undertow
 I never thought I could feel so low
 And oh the darkness I feel like letting go

If all of the strength and all of the courage
 Come and lift me from this place
 I know I could love you much better than this
 Full of grace my love

It's better this way, I said
 Having seen this place before
 Where everything we say and do
 Hurts us all the more
 It's just that we stay too long
 In the same old sickly skin
 I'm pulled down by the undertow
 I never thought I could feel so low
 And Oh the darkness I feel like letting go

If all of the strength and all of the courage
 Come and lift me from this place

I know I could love you much better than this

Full of grace, full of grace, my love

[Back to lyrics](#)

Tab 83

2568

18 § 2244

CRIMES AND CRIMINAL PROCEDURE

Note 7

to review district court's refusal to depart downward. *U.S. v. Fulton*, C.A.9 (Wash.) 1993, 987 F.2d 631.

8. Indictment

There was fatal variance between indictment and proof at trial regarding date of commission of offense of abusive sexual contact on child

within Indian country, where defendant's lawyers developed and presented documentary evidence that defendant, victim, and her mother lived off reservation until after date charged in indictment, contrary to requirements for federal jurisdiction, and only evidence of date when charged conduct occurred was two years after that charged in indictment. *U.S. v. Tahmehjimi*, C.A.9 (Ariz.) 1997, 112 F.3d 988.

§ 2245. Sexual abuse resulting in death

A person who, in the course of an offense under this chapter, engages in conduct that results in the death of a person, shall be punished by death or imprisoned for any term of years or for life.

(Added Pub.L. 103-322, Title VI, § 60010(a)(2), Sept. 13, 1994, 108 Stat. 1972.)

HISTORICAL AND STATUTORY NOTES

Prior Provisions

A prior section 2245 was renumbered section 2246 by Pub.L. 103-322, Title VI, § 60010(a)(1), Sept. 13, 1994, 108 Stat. 1972.

Legislative History

For legislative history and purpose of Pub.L. 103-322, see 1994 U.S. Code Cong. and Adm. News, p. 1801.

LAW REVIEW AND JOURNAL COMMENTARIES

Damage control for victims of physical assault—testing the innocent for AIDS. Michael P. Bruyere, 21 Fla.St.U.L.Rev. 945 (1994).

§ 2246. Definitions for chapter

As used in this chapter—

- (1) the term "prison" means a correctional, detention, or penal facility;
- (2) the term "sexual act" means—

(A) contact between the penis and the vulva or the penis and the anus, and for purposes of this subparagraph contact involving the penis occurs upon penetration, however, slight;

(B) contact between the mouth and the penis, the mouth and the vulva, or the mouth and the anus;

(C) the penetration, however slight, of the anal or genital opening of another by a hand or finger or by any object, with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person; or

(D) the intentional touching, not through the clothing, of the genitalia of another person who has not attained the age of 16 years with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person;

(3) the term "sexual contact" means the intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person;

(4) the term "serious bodily injury" means bodily injury that involves a substantial risk of death, unconsciousness, extreme physical pain, protracted and obvious disfigurement, or protracted loss or impairment of the function of a bodily member, organ, or mental faculty;

(5) the term "official detention" means—

(A) detention by a Federal officer or employee, or under the direction of a Federal officer or employee, following arrest for an offense; following surrender in lieu of arrest for an offense; following a charge or conviction of an offense, or an allegation or finding of juvenile delinquency; following commitment as a material witness; following civil commitment in lieu of criminal proceedings or pending resumption of criminal proceedings that are being held in abeyance, or pending extradition, deportation, or exclusion; or

(B) custody by a Federal officer or employee, or under the direction of a Federal officer or employee, for purposes incident to any detention described in

CRIMES AND CRIMINAL PROCEDURE

sal to depart down-
(Wash.) 1983, 987

within Indian country, where defendant's lawyers developed and presented documentary evidence that defendant, victim, and her mother lived off reservation until after date charged in indictment, contrary to requirements for federal jurisdiction, and only evidence of date when charged conduct occurred was two years after that charged in indictment. *U.S. v. Tammah-jimie*, C.A.9 (Ariz.) 1997, 112 F.3d 988.

indictment
of commission
contact on child

resulting in death

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VI, § 60010(a)(2), Sept. 13, 1994, 108 Stat. 1972.)

HISTORICAL AND STATUTORY NOTES

Legislative History

renumbered section
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REVIEW AND JOURNAL COMMENTARIES

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v. 945 (1994).

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nonconsciousness, extreme physical pain, protracted and obvious
tracted loss or impairment of the function of a bodily member,
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by a Federal officer or employee, or under the direction of a
or employee, following arrest for an offense; following surren-
arrest for an offense; following a charge or conviction of an
ilegation or finding of juvenile delinquency; following commit-
erial witness; following civil commitment in lieu of criminal
pending resumption of criminal proceedings that are being held
pending extradition, deportation, or exclusion; or

by a Federal officer or employee, or under the direction of a
or employee, for purposes incident to any detention described in

CRIMES AND CRIMINAL PROCEDURE

18 § 2248

subparagraph (A) of this paragraph, including transportation, medical diagnosis
or treatment, court appearance, work, and recreation;

but does not include supervision or other control (other than custody during
specified hours or days) after release on bail, probation, or parole, or after release
following a finding of juvenile delinquency.

(Added Pub.L. 99-646, § 87(b), Nov. 10, 1986, 100 Stat. 3622, § 2245, renumbered § 2246 and
amended Pub.L. 103-322, Title IV, § 40502, Title VI, § 60010(a)(1), Sept. 13, 1994, 108 Stat. 1945,
1972.)

HISTORICAL AND STATUTORY NOTES

Codification

Identical provision was enacted by Pub.L.
90-654, § 2, Nov. 14, 1966, 100 Stat. 3652.

1984 Amendments

Par. (2)(D). Pub.L. 103-322, § 40502, added
subpar. (D).

Effective Date

Section effective 30 days after Nov. 10, 1986,
see section 87(e) of Pub.L. 99-646, set out as a
note under section 2241 of this title.

Legislative History

For legislative history and purpose of Pub.L.
99-646, see 1986 U.S. Code Cong. and Adm.
News, p. 6139. See also, Pub.L. 103-322, 1994
U.S. Code Cong. and Adm. News, p. 1801.

LIBRARY REFERENCES

Rape § 1, 2.

C.J.S. Rape § 1 et seq.

NOTES OF DECISIONS

Weight and sufficiency of evidence. 1

1. Weight and sufficiency of evidence

Victim's testimony: that defendant grabbed
and held her arms and placed his upper body on
top of her, that she was unable to push him off

her, and that she was doing everything possible
to resist under the circumstances provided suffi-
cient evidence of force to sustain defendant's
conviction of aggravated sexual abuse involving
use of force. *U.S. v. Jones*, C.A.8 (S.D.) 1997,
104 F.3d 193, rehearing and suggestion for re-
hearing en banc denied, certiorari denied 117
S.Ct. 2470, 188 L.Ed.2d 228.

§ 2247. Repeat offenders

Any person who violates a provision of this chapter, after one or more prior
convictions for an offense punishable under this chapter, or after one or more prior
convictions under the laws of any State relating to aggravated sexual abuse, sexual
abuse, or abusive sexual contact have become final, is punishable by a term of
imprisonment up to twice that otherwise authorized.

(Added Pub.L. 103-322, Title IV, § 40111(a), Sept. 13, 1994, 108 Stat. 1908.)

HISTORICAL AND STATUTORY NOTES

Legislative History

For legislative history and purpose of Pub.L.
103-322, see 1994 U.S. Code Cong. and Adm.
News, p. 1801.

§ 2248. Mandatory restitution

(a) In general.—Notwithstanding section 3663 or 3663A, and in addition to any other
civil or criminal penalty authorized by law, the court shall order restitution for any
offense under this chapter.

(b) Scope and nature of restitution.

(1) Directions.—The order of restitution under this section shall direct the
defendant to pay to the victim (through the appropriate court mechanism) the full
amount of the victim's losses as determined by the court pursuant to paragraph (2).

(2) Enforcement.—An order of restitution under this section shall be issued and
enforced in accordance with section 3664 in the same manner as an order under
section 3663A.

(3) Definition.—For purposes of this subsection, the term "full amount of the
victim's losses" includes any costs incurred by the victim for—

**Bates—Numbered
Documents**

Documents

2072

LAW OFFICES
JANIS, SCHUELKE & WECHSLER
1728 MASSACHUSETTS AVENUE, N.W.
WASHINGTON, D.C. 20036

KARL N. METZNER

TELEPHONE
(202) 861-0600

January 23, 1998

TELECOPIER
(202) 223-7230**BY HAND DELIVERY**

Kenneth W. Starr, Esq.
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W., Suite 490-N
Washington, D.C. 20004

Re: Subpoena Duces Tecum to Betty W. Currie, Grand Jury # 97-3

Dear Mr. Starr:

In response to the above-referenced subpoena duces tecum to Ms. Betty W. Currie, enclosed please find the following:

One copy of the State of the Union address dated January 23, 1996, in a brown envelope.

One autographed photograph of President Clinton, held between two cardboard panels.

One green dress with a "Black Dog" logo, size L.

One turquoise T-shirt with a "Black Dog" logo, size L.

One white T-shirt with a "Seal of the Black Dog of Martha's Vineyard" on the front, size L.

One blue baseball cap with a "Black Dog" logo.

One three-page facsimile message.

Two twenty-page newspaper inserts from the *Washington Post*, February 14, 1997.

One jewelry pin in "Casual Corner" box.

One hatpin with a globe-like base in a black box with gold stars on it.

824-DC-00000001

Kenneth W. Starr, Esq.
January 23, 1998
Page 2

One framed signed picture of President Clinton and Monica Lewinsky.

One bottle, in its box, of Tiffany Spa Moisturizing Hand Cream.

One bottle, in its box, of Tiffany Spa Refreshing Body Mist.

One sympathy card, with envelope.

One card with joke re snowman and carrot, with envelope.

One thank-you card dated September 17, 1997, with envelope.

Four pages of handwritten notes.

Sincerely,



Karl Metzner

Enclosures

824-DC-00000002



824-DC-0000013

An Advertising Supplement
to The Washington Post,
Friday, February 14, 1997



U. S. Secret Service Epass Access Control Report

Date of report:

01/23/98

Search Criteria: LEWINSKI, MONICA

Search Dates: 01/01/97 to 12/31/97

Date	Time	Name	Badge	Type	Post	Status
08/01/97	10:46:17	LEWINSKI, MONICA	34F3D3	C	A4	ENTERING
08/01/97	11:40:27	LEWINSKI, MONICA	34F3D3	C	D2	EXITING
08/01/97	12:19:27	LEWINSKI, MONICA	34F346	C	A4	ENTERING

827-DC-00000002

202483



U. S. SECRET SERVICE

Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
07/10/95	13:18:02	LEWINSKY, MONICA	34EA68	I	D2	ENTERING
07/10/95	17:04:29	LEWINSKY, MONICA	34EA68	I	D2	EXITING
07/11/95	08:51:33	LEWINSKY, MONICA	34E9FF	I	D2	ENTERING
07/11/95	11:52:50	LEWINSKY, MONICA	34E9FF	I	D2	EXITING
07/11/95	16:57:39	LEWINSKY, MONICA	34EC23	I	D2	EXITING
07/12/95	09:00:29	LEWINSKY, MONICA	34E9F4	I	D1	ENTERING
07/12/95	13:20:28	LEWINSKY, MONICA	34E9F4	I	D2	EXITING
07/12/95	13:30:54	LEWINSKY, MONICA	34EA11	I	D2	ENTERING
07/12/95	17:21:31	LEWINSKY, MONICA	34EA11	I	D2	EXITING
07/13/95	09:18:44	LEWINSKY, MONICA	34EC04	I	D2	ENTERING
07/13/95	11:11:34	LEWINSKY, MONICA	34EC04	I	D2	EXITING
07/13/95	12:03:06	LEWINSKY, MONICA	34EA18	I	D2	ENTERING
07/13/95	12:36:50	LEWINSKY, MONICA	34EA18	I	D2	EXITING
07/13/95	13:23:53	LEWINSKY, MONICA	34EA12	I	D2	ENTERING
07/13/95	17:46:42	LEWINSKY, MONICA	34EA12	I	D2	EXITING
07/14/95	08:35:28	LEWINSKY, MONICA	34EA54	I	D1	ENTERING
07/14/95	16:33:22	LEWINSKY, MONICA	34EA54	I	D2	EXITING
07/17/95	08:21:01	LEWINSKY, MONICA	34EA54	I	D2	ENTERING
07/17/95	16:59:54	LEWINSKY, MONICA	34EA54	I	D2	EXITING
07/18/95	08:08:15	LEWINSKY, MONICA	34EC21	N	D2	INACTIVE
07/18/95	08:08:22	LEWINSKY, MONICA	34EC21	I	D2	ENTERING
07/18/95	12:38:05	LEWINSKY, MONICA	34EC21	I	D2	EXITING
07/18/95	14:29:41	LEWINSKY, MONICA	34EA1E	I	D2	ENTERING
07/18/95	18:29:46	LEWINSKY, MONICA	34EA1E	I	D2	EXITING
07/19/95	07:59:12	LEWINSKY, MONICA	34E9F5	I	D2	ENTERING
07/19/95	14:43:32	LEWINSKY, MONICA	34E9F5	I	D2	EXITING
07/20/95	08:59:17	LEWINSKY, MONICA	34EC04	I	D2	ENTERING
07/20/95	12:13:27	LEWINSKY, MONICA	34EC04	I	D2	EXITING
07/20/95	12:54:15	LEWINSKY, MONICA	34E9C6	I	D2	ENTERING
07/20/95	17:46:05	LEWINSKY, MONICA	34E9C6	I	D2	EXITING
07/21/95	08:38:13	LEWINSKY, MONICA	34E0B9	I	D2	ENTERING
07/21/95	12:34:55	LEWINSKY, MONICA	34E0B9	I	D2	EXITING
07/21/95	13:08:16	LEWINSKY, MONICA	34EC23	I	D2	EXITING
07/24/95	08:39:09	LEWINSKY, MONICA	34E948	I	D2	ENTERING
07/24/95	12:29:17	LEWINSKY, MONICA	34E948	I	D2	EXITING
07/24/95	13:36:02	LEWINSKY, MONICA	34E9D1	I	D2	ENTERING
07/24/95	17:31:47	LEWINSKY, MONICA	34E9D1	I	D2	EXITING
07/25/95	08:28:51	LEWINSKY, MONICA	34EA11	I	D2	ENTERING
07/25/95	11:06:23	LEWINSKY, MONICA	34EA11	I	A1	EXITING
07/25/95	11:55:19	LEWINSKY, MONICA	34E9DC	I	D2	ENTERING
07/25/95	12:35:36	LEWINSKY, MONICA	34E9DC	I	D2	EXITING
07/25/95	13:49:01	LEWINSKY, MONICA	34E9BB	I	D2	ENTERING
07/25/95	20:21:37	LEWINSKY, MONICA	34D9BA	N	A4	INACTIVE
07/25/95	20:21:41	LEWINSKY, MONICA	34D9BA	A	A4	ENTERING
07/25/95	20:21:44	LEWINSKY, MONICA	34D9BA	A	A4	ENTERING
07/26/95	09:08:17	LEWINSKY, MONICA	34D9BA	A	A4	UNAUTH
07/26/95	09:08:30	LEWINSKY, MONICA	34EA2F	N	D2	INACTIVE
07/26/95	11:59:49	LEWINSKY, MONICA	34D9BA	A	D2	EXITING
07/26/95	12:24:43	LEWINSKY, MONICA	34EA2F	I	D2	EXITING

01/23/98

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Epass Access Control Report

01/23/98

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Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
07/26/95	12:33:05	LEWINSKY, MONICA	34EB79	N	D2	INACTIVE
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07/26/95	12:39:00	LEWINSKY, MONICA	34EB79	I	D2	ENTERING
07/26/95	13:05:49	LEWINSKY, MONICA	34EB79	I	D2	EXITING
07/26/95	13:38:27	LEWINSKY, MONICA	34EB81	I	D2	ENTERING
07/26/95	18:01:06	LEWINSKY, MONICA	34EB81	I	D2	EXITING
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07/27/95	11:35:58	LEWINSKY, MONICA	34D9B1	N	D1	INACTIVE
07/27/95	11:36:16	LEWINSKY, MONICA	34D9B1	I	D1	ENTERING
07/27/95	12:15:22	LEWINSKY, MONICA	34D9B1	I	D2	EXITING
07/27/95	13:14:52	LEWINSKY, MONICA	34E9C4	I	D2	ENTERING
07/27/95	17:09:44	LEWINSKY, MONICA	34E9C4	I	D2	EXITING
07/28/95	09:04:11	LEWINSKY, MONICA	34EA18	I	D2	ENTERING
07/28/95	10:11:12	LEWINSKY, MONICA	34EA18	I	D2	EXITING
07/28/95	12:20:22	LEWINSKY, MONICA	34E948	I	D2	ENTERING
07/28/95	16:47:56	LEWINSKY, MONICA	34E948	I	D2	EXITING
07/31/95	10:00:37	LEWINSKY, MONICA	34C877	I	D2	ENTERING
07/31/95	13:03:57	LEWINSKY, MONICA	34C877	I	D2	EXITING
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08/01/95	12:49:55	LEWINSKY, MONICA	34E946	I	D2	EXITING
08/01/95	13:39:33	LEWINSKY, MONICA	34E3FC	I	D1	ENTERING
08/01/95	18:31:16	LEWINSKY, MONICA	34E3FC	I	D2	EXITING
08/02/95	08:19:20	LEWINSKY, MONICA	34EC1B	I	D2	ENTERING
08/02/95	12:02:42	LEWINSKY, MONICA	34EC1B	I	D2	EXITING
08/02/95	12:39:58	LEWINSKY, MONICA	34BDC5	I	D2	ENTERING
08/02/95	17:58:33	LEWINSKY, MONICA	34BDC5	I	D2	EXITING
08/03/95	08:14:07	LEWINSKY, MONICA	34E9FB	I	D2	ENTERING
08/03/95	10:18:21	LEWINSKY, MONICA	34E9FB	I	D2	EXITING
08/03/95	14:06:35	LEWINSKY, MONICA	34EA42	I	D2	ENTERING
08/03/95	17:12:58	LEWINSKY, MONICA	34EA42	I	D1	EXITING
08/04/95	08:55:22	LEWINSKY, MONICA	34EA5C	I	D2	ENTERING
08/04/95	13:55:34	LEWINSKY, MONICA	34EA4A	I	D2	ENTERING
08/04/95	17:22:12	LEWINSKY, MONICA	34EA4A	I	D2	EXITING
08/07/95	09:07:46	LEWINSKY, MONICA	34EAC0	I	D2	ENTERING
08/07/95	09:31:13	LEWINSKY, MONICA	34EAC0	I	D2	EXITING
08/07/95	09:49:53	LEWINSKY, MONICA	34EC22	I	D2	ENTERING
08/07/95	12:50:36	LEWINSKY, MONICA	34EC22	I	D2	EXITING
08/07/95	13:58:17	LEWINSKY, MONICA	34E957	I	D2	ENTERING
08/07/95	17:27:48	LEWINSKY, MONICA	34E957	I	D2	EXITING
08/08/95	08:58:27	LEWINSKY, MONICA	34EB79	I	D2	ENTERING
08/08/95	12:57:57	LEWINSKY, MONICA	34EB79	I	D2	EXITING
08/08/95	13:54:45	LEWINSKY, MONICA	34EA1D	I	D2	ENTERING
08/08/95	17:01:35	LEWINSKY, MONICA	34EA1D	I	D2	EXITING
08/08/95	17:15:28	LEWINSKY, MONICA	34EB7F	N	D2	INACTIVE
08/08/95	17:15:45	LEWINSKY, MONICA	34EB7F	I	D2	ENTERING
08/08/95	17:17:25	LEWINSKY, MONICA	34EB7F	I	D2	EXITING
08/09/95	07:39:34	LEWINSKY, MONICA	34EB7A	I	D2	ENTERING
08/09/95	12:33:41	LEWINSKY, MONICA	34EB7A	I	D2	EXITING

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Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
08/09/95	14:16:18	LEWINSKY, MONICA	34EA5B	I	D2	ENTERING
08/09/95	17:17:39	LEWINSKY, MONICA	34EA5B	I	D2	EXITING
08/10/95	09:12:12	LEWINSKY, MONICA	34EA05	I	D2	ENTERING
08/10/95	12:24:33	LEWINSKY, MONICA	34EA05	I	D2	EXITING
08/10/95	13:30:28	LEWINSKY, MONICA	34EA51	I	D2	ENTERING
08/10/95	18:47:58	LEWINSKY, MONICA	34EA51	I	D2	EXITING
08/11/95	09:07:36	LEWINSKY, MONICA	34EC0C	I	D2	ENTERING
08/11/95	12:12:55	LEWINSKY, MONICA	34EC0C	I	D3	EXITING
08/11/95	12:35:58	LEWINSKY, MONICA	34C759	I	D2	ENTERING
08/11/95	17:04:24	LEWINSKY, MONICA	34C759	I	D2	EXITING
08/14/95	08:50:18	LEWINSKY, MONICA	34EA1D	I	D2	ENTERING
08/14/95	12:01:36	LEWINSKY, MONICA	34EA1D	I	D1	EXITING
08/14/95	13:01:13	LEWINSKY, MONICA	34EA26	I	D2	ENTERING
08/14/95	17:59:53	LEWINSKY, MONICA	34EA26	I	D2	EXITING
08/15/95	09:14:27	LEWINSKY, MONICA	34EA2F	I	D2	ENTERING
08/15/95	13:50:00	LEWINSKY, MONICA	34EA2F	I	D2	EXITING
08/15/95	14:01:48	LEWINSKY, MONICA	34EA4E	I	D2	ENTERING
08/15/95	18:28:56	LEWINSKY, MONICA	34EA4E	I	D2	EXITING
08/16/95	09:24:08	LEWINSKY, MONICA	34EA64	I	D2	ENTERING
08/16/95	12:03:29	LEWINSKY, MONICA	34EA64	I	D1	EXITING
08/16/95	13:01:57	LEWINSKY, MONICA	34EC09	I	D1	ENTERING
08/16/95	15:44:27	LEWINSKY, MONICA	34EC09	I	D2	EXITING
08/17/95	09:12:33	LEWINSKY, MONICA	34EAD2	I	D2	ENTERING
08/17/95	17:03:10	LEWINSKY, MONICA	34EAD2	I	D3	EXITING
08/18/95	08:53:24	LEWINSKY, MONICA	34E94C	I	D2	ENTERING
08/18/95	12:34:32	LEWINSKY, MONICA	34E94C	I	D3	EXITING
08/18/95	13:35:25	LEWINSKY, MONICA	34BE78	I	D1	ENTERING
08/18/95	16:16:18	LEWINSKY, MONICA	34BE78	I	D2	EXITING
08/21/95	08:56:08	LEWINSKY, MONICA	34E9D0	I	D2	ENTERING
08/21/95	09:21:43	LEWINSKY, MONICA	34E9D0	I	D3	EXITING
08/21/95	09:31:54	LEWINSKY, MONICA	34EB98	I	D2	ENTERING
08/21/95	12:24:34	LEWINSKY, MONICA	34EB98	I	D1	EXITING
08/21/95	13:15:18	LEWINSKY, MONICA	34E9EC	I	D1	ENTERING
08/21/95	16:58:43	LEWINSKY, MONICA	34E9EC	I	D2	EXITING
08/22/95	09:05:25	LEWINSKY, MONICA	34E9E5	I	D2	ENTERING
08/22/95	12:39:17	LEWINSKY, MONICA	34E9E5	I	D2	EXITING
08/23/95	09:09:20	LEWINSKY, MONICA	34EAC2	I	D2	ENTERING
08/23/95	12:21:36	LEWINSKY, MONICA	34EAC2	I	D1	EXITING
08/23/95	13:42:42	LEWINSKY, MONICA	34B953	I	D2	ENTERING
08/23/95	16:34:46	LEWINSKY, MONICA	34B953	I	D2	EXITING
08/23/95	16:45:37	LEWINSKY, MONICA	34EA50	N	D2	INACTIVE
08/23/95	16:45:44	LEWINSKY, MONICA	34EA50	I	D2	ENTERING
08/23/95	17:27:32	LEWINSKY, MONICA	34EA50	I	D2	EXITING
08/24/95	08:53:10	LEWINSKY, MONICA	34EC08	I	D2	ENTERING
08/24/95	11:17:58	LEWINSKY, MONICA	34EC08	I	D2	EXITING
08/24/95	11:45:50	LEWINSKY, MONICA	34E94E	I	D2	ENTERING
08/24/95	12:53:44	LEWINSKY, MONICA	34E94E	I	D2	EXITING
08/24/95	14:19:33	LEWINSKY, MONICA	34EA66	I	D1	ENTERING
08/25/95	08:56:28	LEWINSKY, MONICA	34A781	I	D2	ENTERING

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U. S. SECRET SERVICE
Epass Access Control Report

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Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
08/25/95	12:14:36	LEWINSKY, MONICA	34A781	I	D2	EXITING
08/25/95	14:01:31	LEWINSKY, MONICA	34EA70	I	D2	ENTERING
08/25/95	15:25:39	LEWINSKY, MONICA	34EA70	I	D2	EXITING
08/28/95	09:17:53	LEWINSKY, MONICA	34EA55	I	D2	ENTERING
08/28/95	12:34:14	LEWINSKY, MONICA	34EA55	I	D2	EXITING
08/28/95	13:15:34	LEWINSKY, MONICA	34EA3B	I	D2	ENTERING
08/28/95	17:23:37	LEWINSKY, MONICA	34EA3B	I	D2	EXITING
08/30/95	10:04:25	LEWINSKY, MONICA	34EA24	I	D2	ENTERING
08/30/95	12:15:11	LEWINSKY, MONICA	34EA24	I	D2	EXITING
09/01/95	13:27:22	LEWINSKY, MONICA	34EA60	I	D2	EXITING
09/01/95	15:04:14	LEWINSKY, MONICA	34EA4F	I	D2	ENTERING
09/01/95	15:38:51	LEWINSKY, MONICA	34EA4F	I	D2	EXITING
09/05/95	08:47:29	LEWINSKY, MONICA	34E9BB	I	D2	ENTERING
09/05/95	12:57:14	LEWINSKY, MONICA	34E9BB	I	D2	EXITING
09/05/95	13:44:06	LEWINSKY, MONICA	34E9B0	I	D2	ENTERING
09/05/95	13:44:09	LEWINSKY, MONICA	34E9B0	I	D2	MULT ENT
09/05/95	18:37:47	LEWINSKY, MONICA	34E9B0	I	D2	EXITING
09/06/95	07:59:41	LEWINSKY, MONICA	34C3D3	A	D2	ENTERING
09/06/95	12:12:43	LEWINSKY, MONICA	34C3D3	A	D2	EXITING
09/06/95	13:26:42	LEWINSKY, MONICA	34E9F0	I	D2	ENTERING
09/06/95	16:00:00	LEWINSKY, MONICA	34E9F0	I	D2	EXITING
09/11/95	08:52:21	LEWINSKY, MONICA	34EA01	I	D2	ENTERING
09/11/95	12:08:06	LEWINSKY, MONICA	34EA01	I	D2	EXITING
09/11/95	13:43:48	LEWINSKY, MONICA	34EA6F	I	D2	ENTERING
09/11/95	18:00:13	LEWINSKY, MONICA	34EA6F	I	D2	EXITING
09/12/95	10:23:21	LEWINSKY, MONICA	34EB86	I	D2	ENTERING
09/12/95	12:24:04	LEWINSKY, MONICA	34EB86	I	D2	EXITING
09/12/95	15:10:54	LEWINSKY, MONICA	34EC07	I	D2	ENTERING
09/12/95	17:08:20	LEWINSKY, MONICA	34EC07	I	D2	EXITING
09/13/95	09:58:16	LEWINSKY, MONICA	34EC07	I	D2	ENTERING
09/13/95	10:14:02	LEWINSKY, MONICA	34EC07	I	D2	EXITING
09/13/95	12:15:30	LEWINSKY, MONICA	34EC07	I	D2	ENTERING
09/13/95	12:24:00	LEWINSKY, MONICA	34EC07	I	D2	EXITING
09/14/95	11:34:16	LEWINSKY, MONICA	34EB92	I	D2	ENTERING
09/14/95	12:39:37	LEWINSKY, MONICA	34EB92	I	D1	EXITING
09/14/95	13:15:46	LEWINSKY, MONICA	34EB8D	I	D2	ENTERING
09/14/95	18:04:48	LEWINSKY, MONICA	34EB8D	I	D2	EXITING
09/15/95	11:46:52	LEWINSKY, MONICA	34E9C9	I	D2	ENTERING
09/15/95	13:11:23	LEWINSKY, MONICA	34E9C9	I	D2	EXITING
09/15/95	13:34:21	LEWINSKY, MONICA	34EB85	I	D2	ENTERING
09/15/95	17:08:03	LEWINSKY, MONICA	34EB85	I	D2	EXITING
09/18/95	09:56:11	LEWINSKY, MONICA	34E9D2	I	D2	ENTERING
09/18/95	13:00:34	LEWINSKY, MONICA	34E9D2	I	D2	EXITING
09/18/95	13:38:45	LEWINSKY, MONICA	34EB76	I	D1	ENTERING
09/18/95	18:36:35	LEWINSKY, MONICA	34EB76	I	D2	EXITING
09/19/95	09:52:57	LEWINSKY, MONICA	34EC1B	I	D2	ENTERING
09/19/95	12:00:13	LEWINSKY, MONICA	34EC1B	I	D2	EXITING
09/19/95	13:38:59	LEWINSKY, MONICA	34BC6F	I	D2	ENTERING
09/19/95	16:42:35	LEWINSKY, MONICA	34BC6F	I	D2	EXITING

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U. S. SECRET SERVICE
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Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
09/20/95	09:10:26	LEWINSKY, MONICA	34EB71	I	D2	ENTERING
09/20/95	12:11:05	LEWINSKY, MONICA	34EB71	I	D2	EXITING
09/20/95	13:23:18	LEWINSKY, MONICA	34F26C	I	D2	ENTERING
09/20/95	15:21:59	LEWINSKY, MONICA	34F26C	I	D2	EXITING
09/29/95	10:39:34	LEWINSKY, MONICA	34E9BF	I	D2	ENTERING
09/29/95	11:33:28	LEWINSKY, MONICA	34E9BF	I	D2	EXITING
09/29/95	12:54:12	LEWINSKY, MONICA	34EA40	I	D2	ENTERING
09/29/95	16:24:10	LEWINSKY, MONICA	34EA40	I	D2	EXITING
10/02/95	13:29:44	LEWINSKY, MONICA	34C698	I	D2	ENTERING
10/02/95	17:36:20	LEWINSKY, MONICA	34C698	I	D2	EXITING
10/04/95	09:34:58	LEWINSKY, MONICA	34EABD	I	D2	ENTERING
10/04/95	13:26:30	LEWINSKY, MONICA	34EC06	I	D2	ENTERING
10/04/95	14:56:04	LEWINSKY, MONICA	34EC06	I	D2	EXITING
10/10/95	09:16:18	LEWINSKY, MONICA	34F24C	I	D2	ENTERING
10/10/95	12:55:46	LEWINSKY, MONICA	34F24C	I	D2	EXITING
10/11/95	09:14:40	LEWINSKY, MONICA	34EA64	I	D2	ENTERING
10/11/95	12:11:43	LEWINSKY, MONICA	34EA64	I	D2	EXITING
10/13/95	12:22:43	LEWINSKY, MONICA	34F263	I	D2	ENTERING
10/13/95	14:12:27	LEWINSKY, MONICA	34F263	I	D2	EXITING
10/16/95	10:00:10	LEWINSKY, MONICA	34E9D3	I	D2	ENTERING
10/16/95	13:09:37	LEWINSKY, MONICA	34E9D3	I	D2	EXITING
10/16/95	13:58:43	LEWINSKY, MONICA	34F24C	I	D2	ENTERING
10/16/95	16:21:36	LEWINSKY, MONICA	34F24C	I	D2	EXITING
10/17/95	10:11:05	LEWINSKY, MONICA	34EAD3	I	D2	ENTERING
10/17/95	14:14:42	LEWINSKY, MONICA	34EAD3	I	D1	EXITING
10/17/95	14:33:03	LEWINSKY, MONICA	34EA21	I	D1	ENTERING
10/17/95	15:29:02	LEWINSKY, MONICA	34EA21	I	D2	EXITING
10/17/95	19:58:46	LEWINSKY, MONICA	34D792	A	A4	ENTERING
10/17/95	20:43:47	LEWINSKY, MONICA	34D792	A	A4	EXITING
10/18/95	09:29:35	LEWINSKY, MONICA	34EA20	I	D1	ENTERING
10/18/95	12:01:50	LEWINSKY, MONICA	34EA20	I	D2	EXITING
10/18/95	12:40:27	LEWINSKY, MONICA	34EA29	I	D2	ENTERING
10/18/95	15:54:30	LEWINSKY, MONICA	34EA29	I	D2	EXITING
10/19/95	12:24:37	LEWINSKY, MONICA	34E9AA	I	D2	ENTERING
10/19/95	12:59:20	LEWINSKY, MONICA	34E9AA	I	D1	EXITING
10/20/95	08:49:45	LEWINSKY, MONICA	34CBD2	I	D2	ENTERING
10/20/95	12:06:14	LEWINSKY, MONICA	34CBD2	I	D2	EXITING
10/20/95	18:56:17	LEWINSKY, MONICA	34EB8C	I	D2	ENTERING
10/20/95	18:59:54	LEWINSKY, MONICA	34EB8C	I	D2	EXITING
11/06/95	09:10:39	LEWINSKY, MONICA	34BC6F	I	D2	ENTERING
11/06/95	12:23:50	LEWINSKY, MONICA	BC6F	I	D2	EXITING
11/06/95	13:05:35	LEWINSKY, MONICA	34A092	N	D2	INACTIVE
11/06/95	13:05:46	LEWINSKY, MONICA	34A092	I	D2	ENTERING
11/06/95	16:26:48	LEWINSKY, MONICA	34A092	I	D2	EXITING
11/06/95	16:32:55	LEWINSKY, MONICA	34BDF9	I	D2	ENTERING
11/06/95	16:35:52	LEWINSKY, MONICA	34BDF9	I	D2	EXITING
11/07/95	10:52:47	LEWINSKY, MONICA	34E952	I	D2	ENTERING
11/07/95	12:36:11	LEWINSKY, MONICA	34E952	I	D2	EXITING
11/07/95	13:17:49	LEWINSKY, MONICA	34A3C4	I	D2	ENTERING

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U. S. Secret Service Epass Access Control Report

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Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
11/07/95	14:46:13	LEWINSKY, MONICA	34A3C4	I	D2	EXITING
11/07/95	16:05:05	LEWINSKY, MONICA	34A3C4	I	D2	ENTERING
11/07/95	19:39:56	LEWINSKY, MONICA	34A3C4	I	D2	EXITING
11/08/95	08:54:24	LEWINSKY, MONICA	34F289	I	D2	ENTERING
11/08/95	11:14:43	LEWINSKY, MONICA	34A092	I	D2	ENTERING
11/08/95	12:26:29	LEWINSKY, MONICA	34A092	I	D2	EXITING
11/08/95	13:07:45	LEWINSKY, MONICA	34EA26	I	D2	ENTERING
11/08/95	18:29:02	LEWINSKY, MONICA	34EA26	I	B4	EXITING
11/09/95	09:22:03	LEWINSKY, MONICA	34EA08	I	D2	ENTERING
11/09/95	12:48:14	LEWINSKY, MONICA	34EA08	I	D2	EXITING
11/09/95	13:48:15	LEWINSKY, MONICA	34AE80	I	D2	ENTERING
11/09/95	18:05:26	LEWINSKY, MONICA	34AE80	I	D2	EXITING
11/13/95	09:29:13	LEWINSKY, MONICA	34F253	I	D1	ENTERING
11/13/95	11:31:52	LEWINSKY, MONICA	34F253	I	D2	EXITING
11/13/95	13:32:08	LEWINSKY, MONICA	34EA63	I	D2	ENTERING
11/13/95	21:35:26	LEWINSKY, MONICA	34EA63	I	B4	EXITING
11/14/95	08:50:42	LEWINSKY, MONICA	34EC08	I	D2	ENTERING
11/14/95	08:50:53	LEWINSKY, MONICA	34EC08	I	D2	MULT ENT
11/14/95	20:11:54	LEWINSKY, MONICA	34EC08	I	D2	EXITING
11/15/95	13:30:07	LEWINSKY, MONICA	34DAF5	A	A4	ENTERING
11/15/95	17:07:20	LEWINSKY, MONICA	34D944	A	A4	ENTERING
11/16/95	00:18:01	LEWINSKY, MONICA	34D944	A	B4	EXITING
11/16/95	09:01:46	LEWINSKY, MONICA	34DA8C	A	A4	ENTERING
11/16/95	12:27:45	LEWINSKY, MONICA	34DA8C	A	A4	EXITING
11/16/95	14:57:52	LEWINSKY, MONICA	34E31B	A	A4	ENTERING
11/17/95	08:15:50	LEWINSKY, MONICA	34DA03	A	A4	ENTERING
11/17/95	20:55:36	LEWINSKY, MONICA	34DA03	A	B4	EXITING
11/17/95	21:37:36	LEWINSKY, MONICA	34D9A3	A	B4	ENTERING
11/17/95	22:38:33	LEWINSKY, MONICA	34D9A3	A	B4	EXITING
11/18/95	09:04:49	LEWINSKY, MONICA	34C51D	A	A4	ENTERING
11/20/95	09:05:38	LEWINSKY, MONICA	34F263	I	D2	ENTERING
11/20/95	12:48:37	LEWINSKY, MONICA	34F263	I	B4	EXITING
11/20/95	15:23:26	LEWINSKY, MONICA	34EA38	I	D2	ENTERING
11/20/95	17:55:37	LEWINSKY, MONICA	34EA38	I	D1	EXITING
11/20/95	18:16:58	LEWINSKY, MONICA	34E9EA	I	D1	ENTERING
11/20/95	20:23:05	LEWINSKY, MONICA	34E9EA	I	D2	EXITING
11/21/95	09:16:35	LEWINSKY, MONICA	34E9EF	I	D2	ENTERING
11/21/95	16:23:50	LEWINSKY, MONICA	34E9EF	I	D2	EXITING
11/22/95	08:59:39	LEWINSKY, MONICA	34CC8E	I	D2	ENTERING
11/22/95	14:45:32	LEWINSKY, MONICA	34CC8E	I	D2	EXITING
11/24/95	13:41:20	LEWINSKY, MONICA	34E9C3	I	D2	ENTERING
11/24/95	17:47:43	LEWINSKY, MONICA	34E9C3	I	D2	EXITING
11/27/95	07:44:10	LEWINSKY, MONICA	34EC21	I	D2	ENTERING
11/27/95	08:55:59	LEWINSKY, MONICA	34C91B	A	K1	ENTERING
11/27/95	10:42:58	LEWINSKY, MONICA	34C91B	A	K1	EXITING
11/27/95	11:01:20	LEWINSKY, MONICA	34EC88	D	D2	ENTERING
11/27/95	20:36:42	LEWINSKY, MONICA	34EC88	D	D2	EXITING
11/28/95	07:46:58	LEWINSKY, MONICA	34ECC4	D	D2	ENTERING
11/29/95	07:51:46	LEWINSKY, MONICA	34ECC5	D	D2	ENTERING

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U. S. SECRET SERVICE
Epass Access Control Report

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Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
11/29/95	10:23:21	LEWINSKY, MONICA	34ECC5	D	A1	MULT ENT
11/29/95	13:21:36	LEWINSKY, MONICA S	34A629	P	ACB	ENTERING
11/29/95	13:33:25	LEWINSKY, MONICA S	34A629	P	A1	EXITING
11/29/95	14:08:45	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
11/29/95	16:36:51	LEWINSKY, MONICA S	34A629	P	A1	EXITING
11/29/95	17:01:46	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
11/30/95	07:39:56	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
11/30/95	09:21:45	LEWINSKY, MONICA S	34A629	P	A5	EXITING
11/30/95	09:44:55	LEWINSKY, MONICA S	34A629	P	K1	ENTERING
11/30/95	09:51:43	LEWINSKY, MONICA S	34A629	P	K1	EXITING
11/30/95	10:03:17	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
11/30/95	14:30:41	LEWINSKY, MONICA S	34A629	P	A1	EXITING
11/30/95	15:09:56	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
11/30/95	20:00:41	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/01/95	07:53:12	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/01/95	19:51:01	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/04/95	08:11:04	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/04/95	08:43:52	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/04/95	08:54:17	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/04/95	12:27:26	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/04/95	12:42:28	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/04/95	19:37:05	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/05/95	07:39:45	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/05/95	12:01:22	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/05/95	12:27:31	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/05/95	17:09:29	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/05/95	19:13:18	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/06/95	07:40:59	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/06/95	10:05:34	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/06/95	16:43:58	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/06/95	16:45:37	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/06/95	19:13:57	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/07/95	00:12:23	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/07/95	15:26:46	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/07/95	16:19:08	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/08/95	07:43:38	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/08/95	13:40:24	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/08/95	14:20:39	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/08/95	15:57:46	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/08/95	17:50:34	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/08/95	21:19:26	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/11/95	07:43:56	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/11/95	19:35:10	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/12/95	08:10:12	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/12/95	17:59:09	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/12/95	18:12:32	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/12/95	21:25:57	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/13/95	07:48:37	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/13/95	13:12:35	LEWINSKY, MONICA S	34A629	P	A1	ENTERING

202409

827-DC-00000009

01/23/98



U. S. SECRET SERVICE
Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
12/13/95	19:39:58	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/14/95	07:58:02	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/14/95	12:48:55	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/14/95	20:21:49	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/15/95	07:54:04	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/15/95	11:13:27	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/15/95	19:40:09	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/16/95	12:01:40	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/16/95	13:31:50	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/16/95	13:32:14	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/16/95	14:27:54	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/17/95	13:23:04	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/18/95	07:56:49	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/18/95	11:04:21	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/18/95	11:16:33	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/18/95	12:36:08	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/18/95	19:59:49	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/19/95	08:35:47	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/19/95	11:27:22	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/19/95	11:36:20	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/19/95	12:40:52	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/19/95	12:58:48	LEWINSKY, MONICA S	34A629	P	A1	BAD PIN
12/19/95	12:59:00	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/19/95	20:17:46	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/20/95	07:54:21	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/20/95	08:08:44	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/20/95	08:15:11	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/20/95	12:31:15	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/20/95	12:45:53	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/20/95	18:05:09	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/21/95	10:10:00	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/21/95	13:03:22	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/21/95	20:18:04	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/22/95	08:00:29	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/22/95	15:07:43	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/22/95	15:24:10	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/22/95	18:19:44	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/26/95	16:36:18	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/26/95	18:16:51	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/26/95	19:06:48	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/26/95	19:58:24	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/28/95	07:58:28	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/28/95	08:31:49	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/28/95	08:39:36	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
12/28/95	11:56:47	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/28/95	15:09:27	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/28/95	15:24:38	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/28/95	20:20:53	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/29/95	08:17:07	LEWINSKY, MONICA S	34A629	P	D2	ENTERING

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202490

827-DC-0000010

2587



U. S. SECRET SERVICE
Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/95 to 12/31/95

Date	Time	Name	Badge	Type	Post	Status
12/29/95	12:13:04	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/29/95	16:35:13	LEWINSKY, MONICA S	34A629	P	A1	EXITING
12/29/95	16:47:53	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
12/29/95	19:35:49	LEWINSKY, MONICA S	34A629	P	D2	EXITING
12/29/95	21:09:40	LEWINSKY, MONICA S	34A629	P	A5	EXITING
12/31/95	13:15:44	LEWINSKY, MONICA S	34A629	P	A5	EXITING

827-DC-00000011

202491



U. S. SECRET SERVICE
Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/96 to 12/31/96

Date	Time	Name	Badge	Type	Post	Status
01/02/96	08:13:05	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/02/96	14:18:09	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
01/02/96	20:46:55	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/03/96	08:11:20	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/03/96	13:46:34	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/03/96	13:54:07	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/03/96	19:42:08	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/04/96	08:15:43	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/04/96	12:27:12	LEWINSKY, MONICA S	34A629	P	A1	EXITING
01/04/96	12:47:25	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
01/04/96	19:23:36	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/05/96	08:11:57	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/05/96	14:28:35	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
01/05/96	19:51:21	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/06/96	13:00:17	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/06/96	15:22:42	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/09/96	11:51:45	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/09/96	12:02:03	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/09/96	19:44:48	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/09/96	19:46:06	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/09/96	20:02:11	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/10/96	08:36:45	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/10/96	15:32:24	LEWINSKY, MONICA S	34A629	P	A1	EXITING
01/10/96	17:25:15	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/11/96	08:34:09	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/11/96	11:44:54	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/11/96	11:55:34	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/11/96	19:29:10	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/12/96	08:39:11	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/12/96	08:42:54	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/12/96	08:55:20	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/12/96	16:42:45	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/15/96	19:01:51	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/16/96	08:23:30	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/16/96	16:16:53	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/16/96	16:22:09	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/16/96	18:39:20	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/17/96	07:58:33	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/17/96	15:49:29	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/17/96	15:56:26	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/17/96	22:29:15	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/18/96	07:51:05	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/18/96	15:37:16	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/18/96	15:46:53	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/18/96	20:55:28	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/19/96	08:05:59	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/19/96	10:29:29	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/19/96	12:36:18	LEWINSKY, MONICA S	34A629	P	A1	EXITING
01/19/96	12:56:19	LEWINSKY, MONICA S	34A629	P	A1	ENTERING

01/23/98

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827-DC-0000012



Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/96 to 12/31/96

Date	Time	Name	Badge	Type	Post	Status
01/19/96	20:30:04	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/21/96	15:56:01	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/22/96	07:52:30	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/22/96	15:16:03	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/22/96	17:18:04	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/22/96	19:53:43	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/22/96	20:15:37	LEWINSKY, MONICA S	34A629	P	B4	ENTERING
01/22/96	23:28:02	LEWINSKY, MONICA S	34A629	P	B4	EXITING
01/23/96	07:20:11	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/23/96	13:17:20	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/23/96	13:32:04	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/23/96	15:38:08	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/23/96	20:10:14	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/23/96	20:27:25	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/23/96	22:41:34	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/24/96	18:48:25	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/25/96	08:21:59	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/25/96	16:38:54	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/25/96	16:48:58	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/25/96	19:38:54	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/26/96	10:03:25	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/26/96	15:20:41	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/26/96	15:23:42	LEWINSKY, MONICA S	34A629	P	K1	ENTERING
01/26/96	15:27:58	LEWINSKY, MONICA S	34A629	P	K1	EXITING
01/26/96	15:30:14	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/26/96	18:16:48	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/30/96	08:07:25	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/30/96	13:08:19	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/30/96	13:28:05	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/30/96	20:44:31	LEWINSKY, MONICA S	34A629	P	D2	EXITING
01/31/96	07:49:23	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/31/96	16:00:05	LEWINSKY, MONICA S	34A629	P	A5	EXITING
01/31/96	16:06:46	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
01/31/96	18:46:32	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/01/96	08:02:52	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/01/96	14:09:03	LEWINSKY, MONICA S	34A629	P	A5	EXITING
02/01/96	14:19:50	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/01/96	21:05:07	LEWINSKY, MONICA S	34A629	P	A5	EXITING
02/02/96	07:50:56	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/02/96	10:36:16	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/02/96	10:45:16	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/02/96	12:48:36	LEWINSKY, MONICA S	34A629	P	A1	EXITING
02/02/96	13:05:11	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
02/02/96	18:46:53	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/05/96	08:03:01	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/05/96	19:53:49	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/06/96	08:21:36	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/06/96	18:30:58	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/07/96	07:54:30	LEWINSKY, MONICA S	34A629	P	D2	ENTERING

01/23/98

202493

827-DC-0000013



U. S. SECRET SERVICE

Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/96 to 12/31/96

Date	Time	Name	Badge	Type	Post	Status
02/07/96	15:45:32	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/07/96	15:51:51	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/07/96	19:21:05	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/08/96	19:52:35	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/09/96	07:55:40	LEWINSKY, MONICA S	34A629	P	D2	BAD PIN
02/09/96	07:55:51	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/09/96	12:49:33	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/09/96	12:56:56	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/09/96	19:21:03	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/12/96	08:05:17	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/12/96	17:27:12	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/12/96	17:39:26	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/12/96	19:25:37	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/13/96	08:10:38	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/13/96	17:12:52	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/13/96	17:19:36	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/13/96	19:10:02	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/14/96	08:04:02	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/14/96	12:58:46	LEWINSKY, MONICA S	34A629	P	A1	EXITING
02/14/96	18:47:25	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/15/96	08:00:47	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/15/96	16:48:53	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/16/96	08:24:57	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/16/96	18:54:29	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/20/96	08:05:10	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/20/96	19:51:48	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/21/96	08:07:35	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/21/96	17:18:39	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/21/96	17:30:10	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/21/96	21:36:11	LEWINSKY, MONICA S	34A629	P	A5	EXITING
02/22/96	08:18:16	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/22/96	14:34:10	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/22/96	14:43:35	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/22/96	19:10:32	LEWINSKY, MONICA S	34A629	P	A5	EXITING
02/23/96	08:21:12	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/23/96	20:24:44	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/24/96	09:41:57	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/24/96	10:13:34	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/24/96	16:31:37	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/24/96	17:26:31	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/26/96	08:04:58	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/26/96	19:28:47	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/27/96	08:02:10	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/27/96	19:13:44	LEWINSKY, MONICA S	34A629	P	D2	EXITING
02/28/96	08:23:36	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
02/28/96	08:55:57	LEWINSKY, MONICA S	34A629	P	A1	EXITING
02/28/96	22:29:21	LEWINSKY, MONICA S	34A629	P	A5	EXITING
02/29/96	08:38:01	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
02/29/96	19:57:12	LEWINSKY, MONICA S	34A629	P	D2	EXITING

202494

827-DC-00000014

01/23/98



Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/96 to 12/31/96

Date	Time	Name	Badge	Type	Post	Status
03/01/96	09:25:01	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/01/96	12:07:12	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/01/96	12:20:21	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/01/96	17:36:49	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/04/96	07:57:49	LEWINSKY, MONICA S	34A629	P	D2	BAD PIN
03/04/96	07:57:58	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/05/96	08:02:52	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/05/96	19:23:27	LEWINSKY, MONICA S	34A629	P	A1	BAD PIN
03/05/96	19:23:33	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/05/96	20:56:11	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/06/96	08:03:23	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/06/96	20:20:26	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/06/96	20:22:16	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/06/96	20:33:23	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/07/96	08:01:49	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/07/96	20:11:23	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/08/96	08:35:55	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/08/96	18:40:01	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/10/96	14:39:52	LEWINSKY, MONICA S	34A629	P	A5	EXITING
03/11/96	07:29:59	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/11/96	11:46:54	LEWINSKY, MONICA S	34A629	P	A1	EXITING
03/11/96	12:02:50	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/11/96	16:28:48	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/12/96	07:49:37	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/12/96	19:04:42	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/13/96	07:56:08	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/13/96	18:57:21	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/14/96	08:08:33	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/14/96	12:19:49	LEWINSKY, MONICA S	34A629	P	A1	EXITING
03/14/96	12:34:28	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/14/96	19:28:23	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/15/96	07:52:58	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/15/96	17:54:41	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/16/96	15:39:49	LEWINSKY, MONICA S	34A629	P	B4	ENTERING
03/16/96	15:52:27	LEWINSKY, MONICA S	34A629	P	B4	EXITING
03/17/96	16:43:33	LEWINSKY, MONICA S	34A629	P	A5	EXITING
03/18/96	08:02:43	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/18/96	12:50:09	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/18/96	13:26:12	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/18/96	21:31:08	LEWINSKY, MONICA S	34A629	P	A5	EXITING
03/19/96	08:10:39	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/19/96	21:04:33	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/19/96	23:57:20	LEWINSKY, MONICA S	34A629	P	A5	EXITING
03/20/96	08:13:03	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/20/96	19:57:07	LEWINSKY, MONICA S	34A629	P	A5	EXITING
03/21/96	08:22:30	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/21/96	20:09:29	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/22/96	07:54:28	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/22/96	10:53:32	LEWINSKY, MONICA S	34A629	P	A1	EXITING

01/23/98

202495

827-DC-00000015



U. S. SECRET SERVICE
Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/96 to 12/31/96

Date	Time	Name	Badge	Type	Post	Status
03/22/96	11:48:26	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/23/96	09:01:46	LEWINSKY, MONICA S	34A629	P	D2	BAD PIN
03/23/96	09:01:53	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/23/96	10:21:43	LEWINSKY, MONICA S	34A629	P	A1	EXITING
03/23/96	10:25:00	LEWINSKY, MONICA S	34A629	P	A1	BAD PIN
03/23/96	10:25:05	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/23/96	14:11:45	LEWINSKY, MONICA S	34A629	P	A5	EXITING
03/24/96	10:47:46	LEWINSKY, MONICA S	34A629	P	B4	ENTERING
03/24/96	11:13:10	LEWINSKY, MONICA S	34A629	P	A1	EXITING
03/24/96	11:13:14	LEWINSKY, MONICA S	34A629	P	A1	EXITING
03/24/96	21:29:48	LEWINSKY, MONICA S	34A629	P	B4	EXITING
03/25/96	07:42:24	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/25/96	12:31:03	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/25/96	12:35:52	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/26/96	07:53:43	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/26/96	12:10:33	LEWINSKY, MONICA S	34A629	P	A1	EXITING
03/26/96	12:22:15	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/26/96	19:45:21	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/27/96	08:05:19	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/27/96	11:29:57	LEWINSKY, MONICA S	34A629	P	A1	EXITING
03/27/96	11:49:47	LEWINSKY, MONICA S	34A629	P	A1	ENTERING
03/27/96	19:07:40	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/27/96	21:16:58	LEWINSKY, MONICA S	34A629	P	A1	EXITING
03/28/96	08:12:17	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/28/96	17:57:38	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/28/96	18:12:20	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/29/96	08:04:11	LEWINSKY, MONICA S	34A629	P	D2	BAD PIN
03/29/96	08:04:17	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
03/29/96	20:55:41	LEWINSKY, MONICA S	34A629	P	D2	EXITING
03/31/96	10:20:40	LEWINSKY, MONICA S	34A629	P	B4	ENTERING
03/31/96	16:27:13	LEWINSKY, MONICA S	34A629	P	B4	EXITING
04/01/96	12:31:59	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
04/01/96	18:50:51	LEWINSKY, MONICA S	34A629	P	D2	EXITING
04/02/96	07:53:01	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
04/03/96	07:58:13	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
04/03/96	18:48:19	LEWINSKY, MONICA S	34A629	P	D2	EXITING
04/04/96	08:04:50	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
04/04/96	18:32:37	LEWINSKY, MONICA S	34A629	P	D2	EXITING
04/05/96	08:05:09	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
04/05/96	13:13:03	LEWINSKY, MONICA S	34A629	P	D2	EXITING
04/05/96	13:13:03	LEWINSKY, MONICA S	34A629	P	D2	EXITING
04/05/96	13:42:17	LEWINSKY, MONICA S	34A629	P	D2	EXITING
04/05/96	18:20:57	LEWINSKY, MONICA S	34A629	P	D2	ENTERING
04/07/96	10:47:52	LEWINSKY, MONICA S	34A629	P	B4	ENTERING
04/07/96	14:51:05	LEWINSKY, MONICA S	34A629	P	B4	EXITING
04/07/96	16:56:44	LEWINSKY, MONICA S	34A629	P	B4	ENTERING
04/07/96	17:28:39	LEWINSKY, MONICA S	34A629	P	B4	EXITING
04/09/96	11:55:35	LEWINSKY, MONICA	34D9BD	A	D2	ENTERING
06/07/96	12:50:54	LEWINSKY, MONICA	34D8A2	A	D2	ENTERING

202496

827-DC-00000016

01/23/98



U. S. Secret Service Epass Access Control Report

Date of report.

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/96 to 12/31/96

Date	Time	Name	Badge	Type	Post	Status
06/07/96	13:03:49	LEWINSKY, MONICA	34D8A2	A	D2	EXITING
08/29/96	15:05:30	LEWINSKY, MONICA	34C3ED	A	D2	ENTERING
08/29/96	15:46:41	LEWINSKY, MONICA	34C3ED	A	D2	EXITING
08/29/96	18:22:28	LEWINSKY, MONICA	34C3CF	A	D2	ENTERING
08/29/96	19:03:52	LEWINSKY, MONICA	34C3CF	A	B4	EXITING
10/11/96	12:48:35	LEWINSKY, MONICA	34D9D2	A	D1	ENTERING
10/11/96	13:49:16	LEWINSKY, MONICA	34D9D2	A	D1	EXITING
10/24/96	07:41:53	LEWINSKY, MONICA	34E542	A	B4	ENTERING
10/24/96	10:11:18	LEWINSKY, MONICA	34E542	A	D1	EXITING
12/17/96	19:33:34	LEWINSKY, MONICA	34DADD	A	D1	ENTERING
12/17/96	20:10:53	LEWINSKY, MONICA	34DADD	A	B4	EXITING
12/30/96	13:01:18	LEWINSKY, MONICA	34E3E8	A	A4	ENTERING
12/30/96	13:42:41	LEWINSKY, MONICA	34E3E8	A	A4	EXITING

827-DC-00000017

202497



Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/97 to 12/31/97

Date	Time	Name	Badge	Type	Post	Status
02/24/97	09:38:25	LEWINSKY, MONICA	34D8D7	A	D2	ENTERING
02/24/97	10:32:24	LEWINSKY, MONICA	34D8D7	A	D2	EXITING
02/28/97	17:48:21	LEWINSKY, MONICA	34F4FB	A	A4	ENTERING
02/28/97	19:07:08	LEWINSKY, MONICA	34F4FB	A	A4	EXITING
03/13/97	10:01:22	LEWINSKY, MONICA	34F4F4	A	A4	ENTERING
03/13/97	10:15:27	LEWINSKY, MONICA	34F4F4	A	A5	EXITING
03/13/97	21:21:24	LEWINSKY, MONICA	34D880	A	B4	ENTERING
03/13/97	21:48:33	LEWINSKY, MONICA	34D880	A	B4	EXITING
03/29/97	14:02:57	LEWINSKY, MONICA	34C597	A	A4	ENTERING
03/29/97	15:16:10	LEWINSKY, MONICA	34C597	A	A4	EXITING
04/16/97	09:48:36	LEWINSKY, MONICA	34D960	A	A4	ENTERING
04/16/97	09:55:38	LEWINSKY, MONICA	34D960	A	A4	EXITING
05/01/97	17:42:48	LEWINSKY, MONICA	3467A9	A	A4	ENTERING
05/02/97	19:57:03	LEWINSKY, MONICA	34DACB	A	D2	ENTERING
05/02/97	20:21:08	LEWINSKY, MONICA	34DACB	A	D2	EXITING
05/24/97	12:20:39	LEWINSKY, MONICA	34A5AE	A	A4	ENTERING
05/24/97	13:53:30	LEWINSKY, MONICA	34A5AE	A	A4	EXITING
05/30/97	15:32:18	LEWINSKY, MONICA S	3457C6	A	D2	ENTERING
05/30/97	16:01:29	LEWINSKY, MONICA S	3457C6	A	D2	EXITING
06/11/97	10:57:54	LEWINSKY, MONICA S	34D85D	A	D2	ENTERING
06/11/97	12:04:04	LEWINSKY, MONICA S	34D85D	A	D2	EXITING
06/16/97	14:47:23	LEWINSKY, MONICA	345628	A	D1	ENTERING
06/16/97	16:10:45	LEWINSKY, MONICA	345628	A	B4	EXITING
06/24/97	18:59:02	LEWINSKY, MONICA	3468A0	A	A4	ENTERING
06/24/97	19:18:42	LEWINSKY, MONICA	3468A0	A	A4	EXITING
07/04/97	08:51:20	LEWINSKY, MONICA	345622	A	A4	ENTERING
07/14/97	21:33:40	LEWINSKY, MONICA	3467A7	A	B4	ENTERING
07/14/97	23:22:30	LEWINSKY, MONICA	3467A7	A	B4	EXITING
07/16/97	10:45:36	LEWINSKY, MONICA	34F63A	A	D1	ENTERING
07/16/97	11:41:51	LEWINSKY, MONICA	34F63A	A	B4	EXITING
07/24/97	18:04:29	LEWINSKY, MONICA	3468CE	A	A4	ENTERING
07/24/97	18:26:48	LEWINSKY, MONICA	3468CE	A	A4	EXITING
08/16/97	09:01:53	LEWINSKY, MONICA	34D871	A	B4	ENTERING
08/16/97	10:20:04	LEWINSKY, MONICA	34D871	A	B4	EXITING
09/11/97	18:58:35	LEWINSKY, MONICA	34CB84	A	D1	ENTERING
09/11/97	19:05:42	LEWINSKY, MONICA	34CB84	A	D2	EXITING
09/12/97	19:40:54	LEWINSKY, MONICA	34EDF1	A	B4	ENTERING
09/12/97	20:22:23	LEWINSKY, MONICA	34EDF1	A	B4	EXITING
09/22/97	19:11:24	LEWINSKY, MONICA	345827	A	D2	ENTERING
09/22/97	19:25:02	LEWINSKY, MONICA	345827	A	D2	EXITING
10/11/97	09:36:45	LEWINSKY, MONICA	34D9B8	A	B4	ENTERING
10/11/97	10:54:24	LEWINSKY, MONICA	34D9B8	A	B4	EXITING
11/13/97	18:20:43	LEWINSKY, MONICA	34A9AB	A	B4	ENTERING
12/06/97	12:52:09	LEWINSKY, MONICA	346671	A	B4	ENTERING
12/06/97	13:36:02	LEWINSKY, MONICA	346671	A	B4	EXITING
12/15/97	11:31:12	LEWINSKY, MONICA	34DAF6	A	B4	ENTERING
12/15/97	12:38:52	LEWINSKY, MONICA	34DAF6	A	B4	EXITING
12/28/97	08:16:26	LEWINSKY, MONICA	34C4CA	A	B4	ENTERING

202498

827-DC-00000018

(D)

Word#	DEPARTMENT	DATE	COST TIME	CENTE DURATION	DESTINATIO	EXTENSION DIALED	USER DIG	CO
2600	PRESS	03/14/97	ROOM 12:30	212A 1.9	WASZ 1B VA	4048	ADELE GILL	0.
2615	PRESS	03/28/97	ROOM 12:48	212A 6.3	WASZ 1B VA	4048	ADELE GILL	0.
18671	PRESS	04/08/97	ROOM 12:34	212A 1.6	WASZ 1B VA	4048	ADELE GILL	0.
24794	PRESS	06/11/97	ROOM 14:48	212D 5.2	WASZ 1B VA	4076	OFFICE PRE	0.
24837	PRESS	06/23/97	ROOM 11:48	212F 2.1	WASZ 1B VA	4153	SPARE SPA	0.
25308	REF/RESEARCH	06/17/97	REFERENCE 10:08	DESK 3.0	WASZ 1B VA	4160	DESK REFE	0
29030	MILITARY STAFF	05/23/97	ROOM 16:37	720B 0.0	WASZ 1B V	4147	RICHARD C	0.
29031	MILITARY STAFF	05/23/97	ROOM 16:50	720B 0.0	WASZ 1B V	4147	RICHARD C	0.
50051	EXECUTIVE	10/24/97	EXEC-C 14:09	0:00:30	WASZ 1B V	4402	ISABELLE	1-703-697-9312
50101	EXECUTIVE	10/29/97	EXEC-C 11:51	0:00:30	WASZ 1B V	4402	ISABELLE	1-703-697-9312
50102	EXECUTIVE	10/29/97	EXEC-C 13:50	0:00:30	WASZ 1B V	4402	ISABELLE	1-703-697-9312
50143	EXECUTIVE	10/30/97	EXEC-C 13:01	0:01:18	WASZ 1B V	4402	ISABELLE	1-703-697-9312
55274	EXECUTIVE	11/03/97	EXEC 11:02	0:02:54	WASZ 1B V	4404	WILLIAM RI	1-703-697-9312 0.
63728	PRESS	11/05/97	ROOM 15:58	212A 0:01:06	WASZ 1B V	4048	ADELE GILL	1-703-697-9312 0.
63751	PRESS	11/17/97	ROOM 19:29	212A 0:01:00	WASZ 1B V	4048	ADELE GILL	1-703-697-9312 0.
63799	PRESS	11/20/97	ROOM 13:23	212B 0:01:54	WASZ 1B V	4050	SPARE PRE	1-703-697-9312 0
63905	PRESS	11/18/97	ROOM 07:34	212C 0:01:24	WASZ 1B V	4052	REBECCA N	1-703-697-9312 0.
4418	PRESS	11/05/97	ROOM 14:51	215 0:05:18	WASZ 1B V	4058	CALVIN MI	1-703-697-9312 0
4474	PRESS	11/13/97	ROOM 17:46	215 0:02:00	WASZ 1B V	4058	CALVIN MI	1-703-697-9312 0
4479	PRESS	11/14/97	ROOM 12:48	215 0:01:30	WASZ 1B V	4058	CALVIN MI	1-703-697-9312 0
4546	PRESS	11/23/97	ROOM 17:14	215 0:03:00	WASZ 1B V	4058	CALVIN MI	1-703-697-9312 0
4650	UNATTACHED	11/17/97	UNATTACHED 16:44	0:06:36	WASZ 1B V	4294	SHOCAS SP	1-703-697-9312 0.
4650	PRESS	12/18/97	ROOM 12:30	212A 0:01:18	WASZ 1B V	4048	ADELE GILL	1-703-697-9312 0.
465	PRESS	12/22/97	ROOM 15:16	215 0:04:24	WASZ 1B V	4058	CALVIN MI	1-703-697-9312 0.

828-DC-00000003

<u>Res. Id#</u>	<u>DEPARTMENT</u>	<u>DATE</u>	<u>COST CENTE</u>	<u>TIME</u>	<u>DURATION</u>	<u>DESTINATIO</u>	<u>EXTENSION</u>	<u>USER</u>	<u>CO</u>
<u>ST</u>							<u>DIALED DIG</u>		
49735	EXECUTIVE	10/21/97	EXEC	19:01	0:05:42	WASHINGTON D	4404 1-202-965-6355	WILLIAM RI	O.
RDSON									
50074	EXECUTIVE	10/27/97	EXEC-C	17:15	0:00:36	WASHINGTON D	4402 1-202-965-6355	ISABELLE	
KINS									
50168	EXECUTIVE	10/30/97	EXEC-C	16:45	0:00:42	WASHINGTON D	4402 1-202-965-6355	ISABELLE	
WATKINS									
0.12									
50170	EXECUTIVE	10/30/97	EXEC-C	17:28	0:00:30	WASHINGTON D	4402 1-202-965-6355	ISABELLE	
WATKINS									
0.05									
60857	EXECUTIVE-III	11/19/97	EXEC-III-G	11:28	0:00:48	WASHINGTON D	4029 1-202-965-6355	MONA KAI	O.
SUTPHEN									
13									

828-DC-00000004

Monica S. Lewinsky

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(U)

Education:

Lewis and Clark College Portland, Oregon
 Bachelor of Science in Psychology May 1995

Experience:

Department of Defense The Pentagon Washington, D.C.
Confidential Assistant to the Assistant Secretary of Defense for Public Affairs
 April 1996 - present

Serve as principal assistant to the Assistant Secretary of Defense (ASD) for Public Affairs in support of his dual role as both Department of Defense spokesman and head of Department of Defense Public Affairs. Assist in preparing the ASD for bi-weekly press briefings. Interact with the national print and broadcast media on the ASD's behalf. Provide the ASD with timely updates of current media stories. Act as liaison with the offices of the Secretary, the White House, other Cabinet Secretaries and the National Security Council. Provide support to the Secretary of Defense and Assistant Secretary on frequent international travel which includes a contingent of traveling media. Handle the ASD's daily schedule and correspondence.

The White House Washington, D.C.

Staff Assistant to Director of Legislative Affairs Correspondence, November 1995 - April 1996
 Wrote drafts and correspondence for Staff Secretary's approval and ultimately the President's signature, which often required research of various Administration issues and policies. Coordinated mass mailings to Congress for the President and other Senior Administration officials. Processed and vetted all incoming mail to the President from Congress. Trained and supervised new interns on White House procedure and preparation of White House correspondence.

The White House Washington, D.C.

Summer Intern Office of the Chief of Staff, July - November 1995
 Drafted form letters and individual responses for the Chief of Staff's signature. Acted as a liaison for Chief of Staff's office to other White House offices, Cabinet agencies, and Congressional offices. Updated office manual. Supervised and coordinated intern and volunteer staff.

Metropolitan Public Defenders Portland, Oregon

Alternatives Staff, February - May 1995

Implemented new psychology expert reference techniques. Assisted attorneys in finding viable alternatives to prison for their clients. Directed clients in successful search for support, shelter, food and transportation. Updated files on resource materials.

Southeast Mental Health Network (Practicum) Portland, Oregon

Socialization Staff Assistant, January - June 1994

Assisted staff in teaching socialization skills to mentally ill clients to ease their integration back into society. Updated clients' confidential reports. Coordinated fund raising to benefit extra-curricular theatre activities.

Additional Information:

828-DC-00000012

- TS-SCI Clearance: Current
- Proficient in Macintosh for Microsoft Word 6.0, WordPerfect for Windows 5.2, Quorum, and Infoya.

Monica S. Lewinsky

[REDACTED]

WIND

Monica
What does
this?
mean?

3 November 1997

The Honorable Bill Richardson
United States Ambassador to the United Nations
799 United Nations Plaza
New York, New York 10017

Dear Ambassador Richardson:

It was a pleasure meeting with you last Friday morning. I know how very busy and demanding your schedule is; I particularly appreciated your taking the time to speak with me.

It was an honor to meet you. The US Mission to the United Nations is certainly in good hands with you at the helm.

Again, thank you for your time.

Sincerely,

Monica Lewinsky

Monica Lewinsky

BR -
SHE WROTE
THIS NOTE BEFORE
WE SPOKE LAST
WEEK. JUST A
THANK YOU.

Ⓢ

5:15 PM Principals meeting on Iraq, White House
 7:00 PM Mike Parker 2445 RHOB ([REDACTED])

OVERNIGHT WATERGATE

FRIDAY, OCTOBER 31, 1997
 (HALLOWEEN)

7:30 AM Meeting with Monica Lewinsky, Watergate
 ([REDACTED])
 8:30 AM Ben Gilman 2449 RHOB ([REDACTED])
 9:00 AM Xavier Becerra 1119 LHOB ([REDACTED])
 9:30 AM Nita Lowey 2421 RHOB ([REDACTED])
 10:00 AM Bill Hefner 2470 RHOB ([REDACTED])
 10:30 AM Ike Skelton 2227 RHOB ([REDACTED])
 11:15 AM Bob Clement 2229 RHOB ([REDACTED])
 11:15 AM Ed Pastor 2465 RHOB ([REDACTED]) Please
 change to noon if Livingston cancels
 11:30 AM Tom DeLay H-107 Capitol ([REDACTED])
 12:00 PM Rod Grams
 12:30 AM Bob Matsui 2308 RHOB ([REDACTED])
 1:00 PM Speaking Engagement - Earthkind, National
 Press Club (Luncheon begins at Noon)
 2:00 PM Depart Washington
 3:00 PM Arrive New York
 3:30 PM Meeting of the P-5 re Iraq, UN Room C-209
 4:00 PM Security Council
 6:40 PM Interview - CNN, 461 Eighth Avenue, 20th
 Floor ([REDACTED])

A

U27A

Monica Lewinsky

[Redacted]

13 January 1998

IAN 1 4 1997

Ms. Jenna Sheldon
Manager, Corporate Staffing
REVLON
625 Madison Avenue
New York, New York 10022
By fax: [Redacted]

Dear Jenna:

I am so excited about joining the team at Revlon. I think it's going to be great!

The following are two references from my employment at both the Pentagon and the White House. Please feel free to contact them. Mr. Bacon is currently traveling with Secretary Cohen in Asia and will return to the States on the 22nd of January. I would prefer you speak with him vice his deputy.

The Honorable Ken Bacon
Assistant Secretary of Defense
for Public Affairs
[Redacted]

*** Please contact Colonel Ed Veiga, USA to speak with Mr. Bacon.

January 23

The Honorable John Hilley
Assistant to the President for Legislative Affairs
[Redacted]

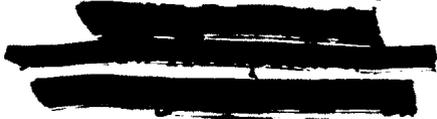
Please let me know if you need any more information.

Sincerely,

Monica Lewinsky
Monica Lewinsky

830-DC-00000007

Monica S. Lewinsky



11 December 1997

Mr. Richard E. Halperin
EVP & Special Counsel to the President
MacAndrews & Forbes
35 East 62nd Street
New York, New York 10021

Dear Mr. Halperin:

I am writing at the suggestion of Vernon Jordan, who has spoken with you on my behalf.

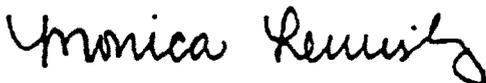
I am interested in exploring opportunities in Communications or Public Relations in New York. I am hoping to secure a position which would require effective communication skills, creativity, and frequent interaction with people. My various jobs in Washington, DC have provided me with the training and skills needed to further pursue a career in these areas.

Most recently, I have been working for the Honorable Ken Bacon, the Assistant Secretary of Defense for Public Affairs, as his primary assistant. My responsibilities range from interacting with the media on his behalf, to providing administrative assistance on the Secretary of Defense's international trips, to assembling timely updates of current media stories. My prior experience was at the White House in Legislative Affairs and the Chief of Staff's Office. Please see the enclosed resume for further detail.

I am moving to New York and am seeking employment to begin the first of the year. I am ready and available to speak with whoever in your office you might deem appropriate. I will follow up with a phone call to your office on Monday, December 15th, 1997.

Thank you for time.

Sincerely,



Monica S. Lewinsky

830-DC-00000017

CC: Mr. Vernon Jordan

WED 13:39

Retail Sales

FAX NO. 6198549C30

P. 04/06

2	992	C 17:28 01-18-98 00:00 01-01-70 1831175	16	8	Pages:	1
13	2 992	C 16:06 01-18-98 00:00 01-01-70 1831175	24	24	Pages:	1
SE CALL KAY AT HOME.						
13	2 992	C 15:22 01-18-98 00:00 01-01-70 1831175	22	24	Pages:	1
SE CALL KAY AT HOME.						
13	2 992	C 14:12 01-18-98 00:00 01-01-70 1831175	22	25	Pages:	1
SE CALL KAY AT HOME.						
13	2 992	C 20:26 01-17-98 00:00 01-01-70 1831175	10	38	Pages:	1
GINSBURG, [REDACTED]						
13	2 992	C 11:34 01-16-98 00:00 01-01-70 1831175	4	43	Pages:	1
VERY WORRIED. PLS CALL MOM RIGHT AWAY.						
13	2 992	C 11:05 01-16-98 00:00 01-01-70 1831175	11	24	Pages:	1
SE CALL MOM AT HOME.						
13	2 992	C 07:51 01-16-98 00:00 01-01-70 1831175	5	74	Pages:	1
LEAVING THE OTHER PHONE NUMBER, WILL CALL YOU LATER THIS MORNING. M						
13	2 992	C 07:45 01-16-98 00:00 01-01-70 1831175	5	21	Pages:	1
SE CALL MARY ASAP.						
13	2 992	C 07:35 01-16-98 00:00 01-01-70 1831175	2	21	Pages:	1
MARY AT WORK ASAP.						
13	2 992	C 07:35 01-16-98 00:00 01-01-70 1831175	6	41	Pages:	1
CALL MOM AT [REDACTED] OR [REDACTED]						
13	2 992	C 20:19 01-15-98 00:00 01-01-70 1831175	22	11	Pages:	1
AT HOME.						
13	2 992	C 18:57 01-15-98 00:00 01-01-70 1831175	10	21	Pages:	1
SE CALL MARY BACK						
13	2 992	C 18:48 01-15-98 00:00 01-01-70 1831175	14	25	Pages:	1
RETURNING YOUR CALL.						
13	2 992	C 14:22 01-15-98 00:00 01-01-70 1831175	7	22	Pages:	1
SE CALL KAY ASAP.						
13	2 992	C 14:07 01-15-98 00:00 01-01-70 1831175	4	78	Pages:	1
D KAPLOW CALLED. PLEASE CALL [REDACTED] AT HOME OR [REDACTED] AT [REDACTED]						
13	2 992	C 12:55 01-15-98 00:00 01-01-70 1831175	7	10	Pages:	1
L MOM.						
13	2 992	C 11:14 01-15-98 00:00 01-01-70 1831175	7	25	Pages:	1
SE CALL MARY AT HOME.						
13	2 992	C 10:19 01-15-98 00:00 01-01-70 1831175	10	16	Pages:	1
SE CALL MOM.						
13	2 992	C 10:08 01-15-98 00:00 01-01-70 1831175	8	41	Pages:	1
SE CALL FRANK CARTER AT [REDACTED]						
13	2 992	C 09:31 01-15-98 00:00 01-01-70 1831175	10	16	Pages:	1
SE CALL KAY.						
13	2 992	C 07:22 01-15-98 00:00 01-01-70 1831175	10	41	Pages:	1
SE CALL FRANCIS CARTER B [REDACTED]						
13	2 992	C 17:52 01-14-98 00:00 01-01-70 1831175	21	44	Pages:	1
JA, PLEASE CALL DEB B [REDACTED]						
13	2 992	C 15:18 01-13-98 00:00 01-01-70 1831175	6	50	Pages:	1
LL ME WHEN YOU CAN AT [REDACTED] DEBRA						
13	2 992	C 14:36 01-13-98 00:00 01-01-70 1831175	4	15	Pages:	1
SE CALL MOM						
13	2 992	C 13:45 01-13-98 00:00 01-01-70 1831175	2	29	Pages:	1
SE CALL MOM WHEN YOU CAN.						

831-DC-00000008

JAN-25-98 WED 13:36

Retail Sales

FHA TEL 833-0000

13	2	992	C 14:48 01-20-98 00:00 01-01-70 1831175	51	86	Pages:	2
PLEASE CALL MR MARTIN, TELL HIM ON HIS MACHINE, I AM WAITING OUTSIDE, I CANNOT GET IN.							
13	2	992	C 12:42 01-20-98 00:00 01-01-70 1831175	44	105	Pages:	2
DON'T LOOK ANGRY. PEOPLE WHO MAY PROOF VERY IMPORTANT WILL SEE YOU. YOU MUST LOOK COMPOSED. FROM MOM							
13	2	992	C 12:40 01-20-98 00:00 01-01-70 1831175	48	66	Pages:	1
IF YOU ARE IN A RESTAURANT PLEASE BRING HOME SWEET AND LOW. MOM							
13	2	992	C 09:39 01-20-98 00:00 01-01-70 1831175	42	71	Pages:	1
PLEASE CALL MOM. I'M SORRY I COULDN'T PICK UP A MIN AGO. PLS TRY AGAIN.							
13	2	992	C 09:34 01-20-98 00:00 01-01-70 1831175	47	17	Pages:	1
PLEASE CALL MOM.							
13	2	992	C 07:59 01-20-98 00:00 01-01-70 1831175	43	72	Pages:	1
THERE ARE PEOPLE YOU DONT WANT TO SEE WAITING FOR YOU IN THE LOBBY. MOM							
13	2	992	C 20:21 01-19-98 00:00 01-01-70 1831175	40	70	Pages:	1
PLEASE CALL MOM RIGHT AWAY, IF YOU ARE NOT IN A MEETING. IT'S URGENT.							
13	2	992	C 18:54 01-19-98 00:00 01-01-70 1831175	45	16	Pages:	1
PLEASE CALL MOM.							
13	2	992	C 17:31 01-19-98 00:00 01-01-70 1831175	42	16	Pages:	1
PLEASE CALL MOM.							
13	2	992	C 14:39 01-19-98 00:00 01-01-70 1831175	34	16	Pages:	1
PLEASE CALL MOM.							
13	2	992	C 13:55 01-19-98 00:00 01-01-70 1831175	27	75	Pages:	1
MIKE DOUBLEDAY @ [REDACTED] CALLED. PLEASE CALL HIM BACK AT YOUR CONVE NIENCE.							
13	2	992	C 11:46 01-19-98 00:00 01-01-70 1831175	33	40	Pages:	1
PLEASE CALL FRANK CARTER AT [REDACTED]							
13	2	992	C 10:19 01-19-98 00:00 01-01-70 1831175	28	41	Pages:	1
HAVE MOM CALL ME WHEN SHE GETS HOME. MIKE							
13	2	992	C 10:06 01-19-98 00:00 01-01-70 1831175	35	40	Pages:	1
PLEASE CALL BILL GINSBURG AT [REDACTED]							
13	2	992	C 08:44 01-19-98 00:00 01-01-70 1831175	32	41	Pages:	1
IT IS MIKE AGAIN. PLEASE HURRY UP AND CALL ME.							
13	2	992	C 08:18 01-19-98 00:00 01-01-70 1831175	33	31	Pages:	1
THIS MIKE. I AM HOME. PLEASE CALL ME.							
13	2	992	C 08:16 01-19-98 00:00 01-01-70 1831175	31	31	Pages:	1
PLEASE CALL MR JORDAN AT [REDACTED]							
13	2	992	C 07:36 01-19-98 00:00 01-01-70 1831175	29	31	Pages:	1
PLEASE CALL MR. JORDAN AT [REDACTED]							
13	2	992	C 06:39 01-19-98 00:00 01-01-70 1831175	30	31	Pages:	1
I'M HOME. PLEASE CALL ME. MIKE							
13	2	992	C 05:51 01-19-98 00:00 01-01-70 1831175	42	42	Pages:	1
MSG FROM KAY. PLEASE CALL, HAVE GOOD NEWS.							
13	2	992	C 05:44 01-19-98 00:00 01-01-70 1831175	31	38	Pages:	1
PLEASE CALL KATE RE: FAMILY EMERGENCY.							
13	2	992	C 05:41 01-19-98 00:00 01-01-70 1831175	33	28	Pages:	1
KAY IS AT HOME. PLEASE CALL							
13	2	992	C 05:37 01-19-98 00:00 01-01-70 1831175	38	57	Pages:	1
PLEASE CALL KAY AT HOME. IT'S A SOCIAL CALL. THANK YOU							
13	2	992	C 05:33 01-19-98 00:00 01-01-70 1831175	35	24	Pages:	1
PLEASE CALL KAY AT HOME.							
13	2	992	C 05:08 01-19-98 00:00 01-01-70 1831175	40	16	Pages:	1
PLEASE CALL KAY.							
13	2	992	C 04:02 01-19-98 00:00 01-01-70 1831175	24	45	Pages:	1
PLEASE CALL KAY AT HOME AT 8:00 THIS MORNING.							

831-DC-00000009

2	992	C 11:20 01-13-98 00:00 01-01-70 1831175	18	19	Pages: ✓	1
CALL ME. KAY						
13	2	992 C 08:11 01-13-98 00:00 01-01-70 1831175	25	40	Pages:	1
WILL KNOW SOMETHING THIS AFTERNOON. -KAY						
13	2	992 C 03:06 01-13-98 00:00 01-01-70 1831175	31	18	Pages:	1
PLEASE CALL MOM.						
13	2	992 C 14:22 01-12-98 00:00 01-01-70 1831175	12	36	Pages:	1
PLEASE CALL HARISSA AT [REDACTED]						
13	2	992 C 08:18 01-12-98 00:00 01-01-70 1831175	9	41	Pages:	1
PLEASE CALL FRANK CARTER AT [REDACTED]						
13	2	992 C 08:23 01-10-98 00:00 01-01-70 1831175	14	92	Pages:	2
TODAY IS DAD'S BIRTHDAY ISN'T IT? PLEASE CALL ME AS SOON AS YOU CAN. LOVE, E, MIKE [REDACTED]						
13	2	992 C 13:46 01-08-98 00:00 01-01-70 1831175	13	16	Pages:	1
PLEASE CALL MOM.						
13	2	992 C 09:22 01-08-98 00:00 01-01-70 1831175	7	4	Pages:	1
YOUR DAD CALLED [REDACTED] NOT URGENT.						
13	2	992 C 16:27 01-07-98 00:00 01-01-70 1831175	3	31	Pages:	1
PLEASE CALL MOM AT [REDACTED]						
13	2	992 C 08:54 01-07-98 00:00 01-01-70 1831175	5	41	Pages:	1
PLEASE CALL NONA SUTPHEN AT [REDACTED]						
13	2	992 C 17:00 01-06-98 00:00 01-01-70 1831175	20	52	Pages:	1
HAVE YOUR BROTHER CALL ME AT [REDACTED], KENNETH.						
13	2	992 C 12:14 01-06-98 00:00 01-01-70 1831175	13	87	Pages:	2
AMK CARTER AT [REDACTED]. I WILL SEE YOU TOMORROW MORNING AT 10:00 IN MY OFFICE.						
1	2	992 C 08:32 01-06-98 00:00 01-01-70 1831175	15	40	Pages:	1
CALL FRANK CARTER @ [REDACTED]						
13	2	992 C 07:40 01-06-98 00:00 01-01-70 1831175	17	32	Pages:	1
PLEASE COME HOME, MICHAEL IS UP.						
13	2	992 C 07:11 01-06-98 00:00 01-01-70 1831175	10	15	Pages:	1
PLEASE CALL MOM						
13	2	992 C 08:49 01-03-98 00:00 01-01-70 1831175	6	30	Pages:	1
ALEX IS HERE. PLEASE CALL [REDACTED]						
13	2	992 C 09:26 01-02-98 00:00 01-01-70 1831175	26	73	Pages:	1
HURRY UP AND CALL ME I WANT TO LEAVE SOON AND I AM WAITING FOR YOUR CALL						
13	2	992 C 08:58 01-02-98 00:00 01-01-70 1831175	32	42	Pages:	1
I'M AWAKE. CALL ME WHEN YOU GET A CHANCE.						
13	2	992 C 13:42 01-01-98 00:00 01-01-70 1831175	27	109	Pages:	1
GIVE ME A CALL WITH INFO RE: FLIGHT AT HOME OR LEAVE A MSG ON PAGER.						
13	2	992 C 12:00 12-30-97 00:00 01-01-70 1831175	6	27	Pages:	1
CALL ASHLEY @ [REDACTED]						
13	2	992 C 10:25 12-29-97 00:00 01-01-70 1831175	29	46	Pages:	1
FRANK CARTER RETURNED YOUR CALL, [REDACTED]						
13	2	992 C 07:41 12-28-97 00:00 01-01-70 1831175	22	21	Pages:	1
I AM AWAKE. CALL ME.						
13	2	992 C 07:29 12-27-97 00:00 01-01-70 1831175	33	98	Pages:	2
MAKE SURE TO LEAVE MONEY IN THE LOBBY FOR ME BECAUSE I HAVE NO CASH FOR A CAB, PROBABLY \$40. MIKE						
13	2	992 C 13:17 12-24-97 00:00 01-01-70 1831175	60	16	Pages:	1
PLEASE CALL MOM.						
13	2	992 C 09:45 12-23-97 00:00 01-01-70 1831175	39	18	Pages:	1
E CALL MOM.						

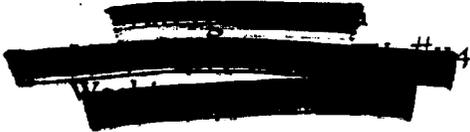
13	2	992	C 04:55 12-22-97 00:00 01-01-70 1831175	33	68	Pages:	1
OT COME TODAY. WILL WAIT AT HOME FOR YOU TO CALL. - LOVE, MOM.							
13	2	992	C 06:13 12-21-97 00:00 01-01-70 1831175	13	21	Pages:	1
PLEASE CALL YOUR MOM.							
13	2	992	C 14:25 12-19-97 00:00 01-01-70 1831175	9	33	Pages:	1
AM TAKING 7:30 TRAIN TONIGHT. MOM							
13	2	992	C 12:30 12-19-97 00:00 01-01-70 1831175	5	46	Pages:	1
I WILL BE AT MY HOME PHONE NUMBER AT 4:30. MOM							
13	2	992	C 12:39 12-19-97 00:00 01-01-70 1831175	12	74	Pages:	1
I WILL BE BY HOME PHONE @ 4:30. MOM (CALLER HUNG UP. MSG NOT VERIFIED)							
13	2	992	C 16:13 12-16-97 00:00 01-01-70 1831175	3	64	Pages:	1
PLEASE CALL MIKE ON MOM'S LINE. I WILL BE WAITING FOR THE CALL.							
13	2	992	C 09:44 12-16-97 00:00 01-01-70 1831175	9	62	Pages:	1
WHAT TIME IS MIKE'S DINNER TONIGHT? PLEASE CALL DEB AT [REDACTED]							
13	2	992	C 12:33 12-11-97 00:00 01-01-70 1831175	11	61	Pages:	1
FAX NUMBER IS [REDACTED] PLS CALL ME WHEN YOU TRANSMIT. MOM							
13	2	992	C 10:45 12-11-97 00:00 01-01-70 1831175	11	61	Pages:	1
CALL YOUR MOM WHEN YOU ARE FINISHED AT [REDACTED] ASK FOR DEBBIE.							
13	2	992	C 09:05 12-07-97 00:00 01-01-70 1831175	14	36	Pages:	1
PLEASE CALL YOUR MOTHER AT [REDACTED]							
13	2	992	C 07:34 12-06-97 00:00 01-01-70 1831175	18	31	Pages:	1
WAS IN RESIDENCE CALL BACK. BETTY							
13	2	992	C 13:40 12-05-97 00:00 01-01-70 1831175	6	3	Pages:	1
-S-							
13	2	992	C 13:35 12-05-97 00:00 01-01-70 1831175	14	42	Pages:	1
PLEASE CALL BETTY CURRIE AT [REDACTED]							
13	2	992	C 09:58 11-30-97 00:00 01-01-70 1831175	62	76	Pages:	1
PLEASE CALL KASSORLA AND TELL HER I HAVE SENT A CHECK. AND PLEASE CALL R ON.							
13	2	992	C 21:57 11-29-97 00:00 01-01-70 1831175	24	22	Pages:	1
CALL ZACK AT [REDACTED]							
13	2	992	C 13:22 11-26-97 00:00 01-01-70 1831175	11	38	Pages:	1
CALL MARSHA AT [REDACTED]							
13	2	992	C 12:07 11-26-97 00:00 01-01-70 1831175	10	40	Pages:	1
PLEASE CALL VERNON JORDAN, BETTY CURRY.							
13	2	992	C 10:39 11-26-97 00:00 01-01-70 1831175	8	70	Pages:	2
I WILL CALL BACK. CURRIE WILL CALL LATER. THANK YOU (MESSAGE NOT VERIFIED. CALLER HUNG UP)							
13	2	992	C 07:35 11-26-97 00:00 01-01-70 1831175	19	21	Pages:	1
PLEASE CALL SAMANTHA.							
13	2	992	C 14:04 11-25-97 00:00 01-01-70 1831175	8	19	Pages:	1
PLEASE CALL MARSHA.							
3	1	992	C 09:26 11-25-97 00:00 01-01-70 1831175	9	19		0
TEST PAGE FROM MOC.							
3	1	992	C 07:57 11-24-97 00:00 01-01-70 1831175	13	71		0
WELCOME TO YOUR NEW ALPHA MESSAGE SERVICE, YOUR NUMBER IS [REDACTED]							

 TOTAL PAGES BILLABLE: 136
 TOTAL MQU'S BILLABLE: 0
 TOTAL ETP Pages BILLABLE: 0

TYPE	DESCRIPTION	COUNT
3 - Page	Test Page	2
3 - Page	800 Operator Alpha Page	136
		138

831-DC-0000011

Monica S. Lewinsky



6 November 1997

Mr. Vernon Jordan
Akin, Gump, Strauss, Hauer & Feld
1333 New Hampshire, NW
Washington, DC 20036

Dear Mr. Jordan:

It was a real pleasure meeting with you. I know how very busy and demanding your schedule is; I particularly appreciated your taking the time to speak with me.

I feel compelled to mention how overcome I was by your genuineness. While some people wear their heart on their sleeve; you appear to wear your soul. It made me happy to know that our friend has such a wonderful confidante in you.

I believe I may have neglected to mention that while my current position is administrative, I am seeking more substantive work in my next position.

Thanks again for your time, and I look forward to hearing from you upon your return.

Sincerely,

Monica S. Lewinsky

833-DC-0000980

Scan of Xerox telecopier 7021, 4717250, 11/07/90

Selection Detail Report

Company Name

DATE	TIME	DURATION MOON:MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT CODE	COST (DOLLARS)
01/21/90	09:12	0:07:24				OUTGO			8.80

832-DC-00000005

SENT BY: Xerox Telecopier 7021 ; 4-10-98 ; 1:07PM ;

2122231942-

12025140002.0

Selection Detail Report

Company Name

DATE	TIME	DURATION HH:MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT CODE	COST (DOLLARS)
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832-DC-00000004

01/21/98	00:11	0:00:30							
01/21/98	00:13	0:00:00							
01/21/98	00:18	0:10:00							



OUTGO	
OUTGO	
OUTGO	
OUTGO	



0.00
0.00
0.00
0.00

24 June 1997

Dear Betty:

Since I have not been able to get in touch with him, I am taking the unorthodox liberty of sharing my concerns with you. I would very much appreciate it if you could relay this information to him either verbally or by letting him read this note. If you're not comfortable doing either, I understand.

The intention of this note is not to "tattle-tale", but to clarify. My meeting with Marsha was not at all what I expected. While she was very pleasant, she questioned me endlessly about my situation. Despite the fact that she already knew why I had to leave, she asked me to tell her about it, asked if I had acted "inappropriately" and why I wanted to come back. She seemingly knew nothing about my current position. She didn't know of any openings and said she would check with the people in Communications. He said to me that he had told her I had gotten a bum deal, and I should get a good job in the West Wing. I was surprised that she would question his judgment and not just do what he asked of her. Is it possible that, in fact, he did not tell her that? Does he really not want me back in the complex? He has not responded to my note, nor has he called me. Do you know what is going on? If so, are you able to share it with me?

I did not cause any trouble when I had to leave last year because I knew how important the election was. He promised me then I could come back after the election, and I have been counting on him. I think I have been more than patient since it has now been eight months since the election, not to mention the seven months prior to November that I waited. Shall I continue to be patient?

Betty, I am very frustrated and sad. I especially don't understand this deafening silence, lack of response and complete distancing evidenced by him. Why is he ignoring me? I have done nothing wrong. I would expect that behavior like this might be directed toward an "unfriendly", but certainly not to me. I would *never* do anything to hurt him.

I am hoping to hear from either of you soon. I'm at a loss, and I don't know what to do.

Best wishes.

833-DC-00001070

Tripp, Linda, , OSD/PA

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: hi, ya
Date: Wednesday, March 05, 1997 11:34AM

Are you asking me if the tie is really pretty? It is positively gorgeous. I am not (ha!) particularly into ties, but from my exposure to you, I am developing an interest. Yours was stupendous, no kidding, clean, crisp, texture, color, pattern, bright, without being at all over the top.....a total hit.

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: hi, ya
Date: Wednesday, March 05, 1997 10:05AM
Priority: High

Boy, I look so scary today. People might think that I thought it was Halloween. Oh, well, [REDACTED] should (if Betty is nice) get my tie today. I sure hope he likes it. Make me feel better and tell me it's really pretty, o.k.? msl

833-DC-00001857

Tripp, Linda, , OSD/PA

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: where are you?
Date: Monday, March 03, 1997 12:48PM

Kate is faxing me a copy of the announcement -- she is planning to go see Marsha today. If someone in house wants it, there is a chance they will get it, but Kate seems confident that that won't happen. She said to have your resume ready. LRT

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: where are you?
Date: Monday, March 03, 1997 12:21PM
Priority: High

Hello, where are you? I am sorry i was such a pain before but this is all very stressful for me. write back. i don't know what's goin on. msl

833-DC-00001876

Tripp, Linda, , OSD/PA

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: ADVICE
Date: Monday, February 24, 1997 11:22AM

Eureka!!!!

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: ADVICE
Date: Monday, February 24, 1997 8:31AM

Hi, I hope you're feeling better ! I 'm trying to go over to the WH today to give Jodie these pictures. I also plan to stop by Betty's office to drop off these lame photos. Any advice/suggestions what to do or say? write me back...msl

833-DC-00001906

Tripp, Linda, , OSD/PA

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: secret message
Date: Wednesday, February 19, 1997 9:01AM

WELCOME BACK!!! How was Jolly, Olde England? Well, here's the saga in a nutshell. On Friday (of course), Howard County (the boondocks where I live) was totally and completely snowed and iced in, so I couldn't get up my hill, schools were closed, no one moved, believe it or not. I was in a panic about the papers.....by the time I could get up the hill late that night, all the Posts were gone, BUT I called work and had my Deputy save me what he could, which was one, and then I found another, so we have two. I can't believe it became that big a deal, but it did. **CALL ME WHEN YOU GET IN.** PS It read beautifully, placement was great, typeface totally effective, and text superlative.....good job. LRT

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: RE: secret message
Date: Thursday, February 13, 1997 1:23PM

O.K. here is my fax in London 011-44-171-235-4552 and phone, just in case, I don't know what, here is the phone number 011-44-171-235-2000. I will also be checking my messages in the hopes that the creep will call and say "Thank you for my love note. I love you. Will you run away with me?" What do ya think the likelihood of that happening is? Also, please don't forget about the newspapers. I will bring you the \$ later.

thanx...xoxoxo...msl

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: secret message
Date: Thursday, February 13, 1997 1:03PM

Ah, but that has already transpired, says my omnipotent crystal ball.....

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: RE: secret message
Date: Thursday, February 13, 1997 11:05AM
Priority: High

IF ONLY I COULD PURSUADE THE CREEP AS EASILY!!!!!!!

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: secret message
Date: Thursday, February 13, 1997 11:03AM

833-DC-00001934

OK OK OK. 12 at bridge.

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: RE: secret message
Date: Thursday, February 13, 1997 10:18AM
Priority: High

I'LL PROBABLY GO GET LUNCH AT 12:00 BECAUSE I'M HUNGRY ALREADY!!! I DON'T THINK I'LL BE MORE THAN 1/2 HOUR BECAUSE I'M LEAVING EARLY. PLEASE ESCAPE WITH ME!!!!!! HOW CAN YOU RESIST ME?? DON'T FORGET I'LL BE GONE FOR AWHILE...MSL

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: secret message

Tripp, Linda, , OSD/PA

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: Afternoon
Date: Tuesday, February 04, 1997 2:55PM

None of the above, if you ask me. Because, none of it makes sense. Do not despair, there is most definitely light at the end of this tunnel. LRT

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: RE: Afternoon
Date: Tuesday, February 04, 1997 2:15PM
Priority: High

Thank God for you! Oh Linda, i don't know what I am going to do. I just don't understand what went wrong, what happened? How could he do this to me? Why did he keep up contact with me for so long and now nothing, now when we could be together? Maybe it was the intrigue of wanting something he couldn't have (easily) with all that was going on then? Maybe he wanted to insure he could have variety and phone sex while he was on the road for those months? AAAAHHHHH!!!!!! I am going to lose it! And, where is Betty's phone call? What's up with all this shit? oh, well. bye.

msl

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: Afternoon
Date: Tuesday, February 04, 1997 2:06PM
Priority: High

Just checking in, it's been a nutty day so I haven't had much chance to see you. I had to go up to the third floor and drop off some paperwork, so I actually walked the entire E-ring, which took 15 minutes. Guess I am kinda slow, huh? Oh well, next time I will go by myself so that I can keep my own pace. I feel as though I did SOMETHING anyway. I have had tons of water the past few days, and even more today, so watch and see, I'll have gained weight tonight, at this rate. I don't seem to be getting rid of the water, so it's hanging out somewhere!! Anyway, my real purpose in jotting off this e-mail is to see what's up with you, and how you're doing. I am so jealous that you are off to London soon, I love it so. I would spend tons of time in Harrod's, spend time on Fleet Street and down in the Silver Vaults, putter around Portebello Road, and shop til I dropped!! I would have high tea every day even if I had to skip real meals. I used to spend all my summers in Europe as a kid, and would sneak over to London whenever I could, always by myself, when I was about 16. Back then (I'm dating myself!!!) you could buy the all time BEST fish and chips from these little holes in the wall, wrapped in newspaper!! It was one of the best things I had ever eaten.

LRT

833-DC-00001974

Form 50-B Department of Personnel Management Form 296-33, Subch. 4													NOTIFICATION OF PERSONNEL ACTION										
(Last, First, Middle) INSKY MONICA S						2. Social Security Number [REDACTED]			3. Date of Birth [REDACTED]		4. Effective Date 12-26-97												
FIRST ACTION						SECOND ACTION																	
5-A. Code 317		5-B. Nature of Action RESIGNATION				6-A. Code		6-B. Nature of Action															
5-C. Code RUM		5-D. Legal Authority REG 715.202 OTHER				6-C. Code		6-D. Legal Authority															
5-E. Code		5-F. Legal Authority				6-E. Code		6-F. Legal Authority															
7. FROM: Position Title and Number CONFIDENTIAL ASSISTANT						15. TO: Position Title and Number																	
720000 DDAKA 16151																							
8. Pay Plan GS		9. Occ. Code 0301		10. Grade/Level 09		11. Step/Rate 02		12. Total Salary \$32,736.00		13. Pay Basis PA		16. Pay Plan		17. Occ. Code		18. Grade/Level		19. Step/Rate		20. Total Salary/Award		21. Pay Basis	
12A. Basic Pay \$30,563		12B. Locality Adj. \$ 2173		12C. Adj. Basic Pay \$32,736		12D. Other Pay \$ 0		20A. Basic Pay		20B. Locality Adj.		20C. Adj. Basic Pay		20D. Other Pay									
14. Name and Location of Position's Organization ASD (PUBLIC AFRS)						22. Name and Location of Position's Organization																	
WASHINGTON, D. C.																							
EMPLOYEE DATA						PERSONNEL INFORMATION																	
Veterans Preference <input checked="" type="checkbox"/> 1 - None <input type="checkbox"/> 2 - 5 Point <input type="checkbox"/> 3 - 10-Point/Disability <input type="checkbox"/> 4 - 10-Point/Compensable <input type="checkbox"/> 5 - 10-Point/Other <input type="checkbox"/> 6 - 10-Point/Compensable/30%						24. Tenure <input checked="" type="checkbox"/> 0 - None <input type="checkbox"/> 1 - Permanent <input type="checkbox"/> 2 - Conditional <input type="checkbox"/> 3 - Indefinite		25. Agency Use		26. Veterans Preference for All <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO													
FEGU BASIC LIFE ONLY						28. Annuitant Indicator <input checked="" type="checkbox"/> NOT APPLICABLE		29. Pay Rate Determination <input type="checkbox"/> 0															
30. Retirement Plan <input checked="" type="checkbox"/> FERS AND FICA			31. Service Comp. Date (Leave) 11-26-95			32. Work Schedule <input checked="" type="checkbox"/> FULL TIME			33. Part-Time Hours Per Biweekly Pay Period														
POSITION DATA			34. Position Occupied <input checked="" type="checkbox"/> 1 - Competitive Service <input type="checkbox"/> 2 - Excepted Service <input type="checkbox"/> 3 - SES General <input type="checkbox"/> 4 - SES Career Reserved			35. FLSA Category <input checked="" type="checkbox"/> E - Exempt <input type="checkbox"/> N - Nonexempt			36. Appropriation Code SEE BLOCKS 43 & 44			37. Bargaining Unit Stat. 8888											
38. Duty Station Code 51-0100-013			39. Duty Station (City - County - State or Overseas Location) ARLINGTON VA																				
40. AGENCY DATA ARK		41.		42.		43. FM:APCY220104 TO:APC:		44. FM:FUNDS SYM 970100.11200000 TO:FUNDS SYM															
45. Remarks SF-8 ISSUED. SF-2810 ISSUED. LUMP-SUM PAYMENT TO BE MADE FOR ANY UNUSED ANNUAL LEAVE. FORWARDING ADDRESS: [REDACTED] HEALTH BENEFITS COVERAGE IS EXTENDED FOR 31 DAYS DURING WHICH YOU ARE ELIGIBLE TO CONVERT TO AN INDIVIDUAL POLICY (NONGROUP CONTRACT). YOU ARE ALSO ELIGIBLE FOR TEMPORARY CONTINUATION OF YOUR FEHB COVERAGE FOR UP TO 18 MONTHS. REASON FOR RESIGNATION: SEEKING EMPLOYMENT OPPORTUNITIES OUTSIDE THE GOVERNMENT.																							
Employing Department or Agency OFFICE OF THE SECRETARY OF DEFENSE						50. Signature/Authentication and Title of Approving Official <i>[Signature]</i> DESIGNATED APPOINTING OFFICIAL																	
Agency Code DD01		48. Personnel Office ID 1936		49. Approval Date 01-22-98																			

**Confidential Assistant to the Assistant Secretary
of Defense for Public Affairs (GS-301-09)**

INTRODUCTION

This position is located in the Office of the Assistant Secretary of Defense for Public Affairs. The Assistant Secretary of Defense for Public Affairs (ASD(PA)) is the principal staff assistant and advisor to the Secretary of Defense on all DoD public affairs programs and activities and on the internal information and related activities of the American Forces Information Service. He is responsible for establishing and implementing policies and systems necessary for the effective and economical performance of DoD public affairs and internal information programs, including those of the military departments.

The incumbent of this Schedule C position will have access to highly confidential, sensitive and frequently politically controversial information and must be a person in whom the ASD(PA) has complete trust and confidence. This close relationship is that of a confidential nature required for Schedule C exception.

DUTIES

833-DC-00002880

As Confidential Assistant, the incumbent provides secretarial and administrative support directly to the ASD(PA) in key areas of his ongoing official and administrative responsibilities.

On behalf of the ASD(PA), maintains contact at primary management levels within the DoD on personal and special taskings. This includes contacts with the office of the Secretary of Defense, the Organization of the Joint Chiefs of Staff, the Secretariats of the military departments, defense agencies and similar DoD components. In addition, incumbent may represent the ASD(PA) in personal and confidential contacts with members of Congress and civilian industry executives.

Travels with the ASD(PA) and Secretary of Defense, providing secretarial and administrative support to the ASD and other members of the Secretary's traveling group, as required.

Participates in all ASD(PA) staff meetings and directors' meetings.

Conducts fact-finding research and summarizes and arranges the data in formats preferred by the ASD(PA). When background material is

cargo handling equipment needed? Will the baggage be loose or palletized? How will the bags be marked - will there be some sort of uniform tag on each bag identifying its owner? How and when are the Civic Leaders leaving Eglin on May 8th - i.e. are they departing on military air?

Concerning the Ramada:

I sort of doubt that the brochure from the Ramada will fax very well - how about if I mail one to you? Give me an address and I'll do just that.

Concerning Gifts:

Is OSD paying us up to \$25 per 60 JCOC participants for gifts?

Concerning JCOC participants:

When can I expect to get a list of JCOC participants? On the list of participants, I need to know their SSNs for the MEGP letters (permission to fly on AF aircraft). Will there be any handicapped individuals? We would like to know of any special medical conditions such as history of motion sickness, asthma, cardiac, diabetes etc. Will that kind of info be available?

In General:

Do you expect full up dress rehearsals for each of your advance trips?

Will the 10 OSD support personnel be going on the demos on May 7 & 8? Did you already get a representative base photo from us? If not, when do you need one? Do you need any bios from us now? Am I required to provide videographers for the visit?

I noticed the comment concerning the "Persian Gulf" vs the "Arabian Gulf". Is that a problem for this trip, i.e. will there be any Arabians in the group?

V/R, Hart Franklin

Tripp, Linda, , OSD/PA

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: I'm back!
Date: Wednesday, February 19, 1997 8:09AM
Priority: High

833-DC-00009446

LRT--- Hi, I missed you!!!! I hope you enjoyed your few days of sanity with me gone because I'm back and NOT in good spirits.

1. I have a small present for you. Everything was SOOOOO expensive so I'm sorry it's small.
2. Nice that the Big Creep didn't even try to call me on V-day and he didn't know for sure that I was going to London.
3. He could have called last night and didn't. He was out of town.
4. Finally, the Babba went away and it was the same night he was gone. Fuck me!!!!

HHHEEELLPPP!!!!

Maybe we can have lunch or meet sometime today cuz I want to give you your present.

Bye...msl

Bell Atlantic TEMPO MDR for 7036979312 per DTS-W Request dated 24 FEB 98

ORIG_TN	DEST_TN	DURATION	Start date-time
7036979312		000:00:13	21NOV97 20:03:09
7036979312		000:00:33	22NOV97 12:13:18
7036979312		000:10:38	22NOV97 12:14:20
7036979312		000:05:09	22NOV97 13:18:43
7036979312		000:02:31	22NOV97 14:33:48
7036979312		000:22:22	22NOV97 14:51:32
7036979312		000:00:19	22NOV97 15:24:37
7036979312		000:09:14	24NOV97 07:43:33
7036979312		000:22:08	24NOV97 07:55:02
7036979312		000:06:44	24NOV97 10:14:17
7036979312		000:00:10	24NOV97 10:18:54
7036979312		000:00:11	24NOV97 10:19:50
7036979312		000:27:06	24NOV97 10:25:38
7036979312		000:02:22	24NOV97 10:57:17
7036979312		000:00:04	24NOV97 11:01:29
7036979312		000:43:22	24NOV97 11:58:36
7036979312		000:08:59	24NOV97 13:13:13
7036979312		000:00:40	24NOV97 13:21:24
7036979312		000:00:51	24NOV97 13:23:16
7036979312		000:00:53	24NOV97 13:25:48
7036979312		000:08:26	24NOV97 14:03:37
7036979312		000:03:50	24NOV97 15:01:07
7036979312		000:00:10	24NOV97 15:13:29
7036979312		000:02:22	24NOV97 15:20:51
7036979312		000:00:59	24NOV97 15:56:05
7036979312		000:00:48	24NOV97 16:51:31
7036979312		000:18:23	24NOV97 16:58:03
7036979312		000:02:28	24NOV97 17:10:01
7036979312		000:17:37	24NOV97 17:17:24
7036979312		000:00:15	24NOV97 17:29:22
7036979312		000:03:23	24NOV97 17:59:54
7036979312		000:00:07	24NOV97 19:02:02
7036979312		000:04:10	24NOV97 19:04:52
7036979312		000:17:10	24NOV97 19:17:55
7036979312		000:03:21	24NOV97 19:43:38
7036979312		000:03:46	24NOV97 20:38:49
7036979312		000:13:33	25NOV97 07:43:30
7036979312		000:07:32	25NOV97 07:59:38
7036979312		000:15:23	25NOV97 08:11:09
7036979312		000:01:58	25NOV97 08:21:03
7036979312		000:00:44	25NOV97 08:28:13
7036979312		000:00:43	25NOV97 08:38:03
7036979312		000:10:16	25NOV97 09:11:30
7036979312		000:00:39	25NOV97 09:34:48
7036979312		000:00:07	25NOV97 09:48:36
7036979312		000:01:53	25NOV97 09:48:54
7036979312		000:00:36	25NOV97 09:50:38
7036979312		000:03:27	25NOV97 09:52:47
7036979312		000:00:06	25NOV97 09:55:35
7036979312		000:07:02	25NOV97 09:55:56
7036979312		000:02:04	25NOV97 10:47:35
7036979312		000:00:41	25NOV97 10:51:39
7036979312		000:00:49	25NOV97 11:38:03
7036979312		001:17:38	25NOV97 11:58:39
7036979312		000:00:09	25NOV97 18:52:02
7036979312		000:13:45	26NOV97 07:42:12
7036979312		000:05:52	26NOV97 09:00:34
7036979312		000:04:00	26NOV97 09:18:26
7036979312		000:39:11	26NOV97 12:27:35
7036979312		000:07:10	26NOV97 14:32:00

833-DC-00017908

Bell Atlantic TEMPO MDR for 7036979312 per DTS-W Request dated 24 FEB 98

RIG_TN	DEST_TN	DURATION	Start date-time
036979312		000:02:22	13NOV97 10:37:05
7036979312		000:01:40	13NOV97 11:06:57
7036979312		000:00:03	13NOV97 11:20:19
7036979312		000:03:20	13NOV97 11:25:46
7036979312		000:00:09	13NOV97 11:29:43
7036979312		000:00:17	13NOV97 11:50:49
7036979312		000:28:20	13NOV97 11:59:25
7036979312		000:21:52	13NOV97 12:25:17
7036979312		000:00:10	13NOV97 13:15:50
7036979312		000:00:23	13NOV97 13:36:43
7036979312		000:00:14	13NOV97 14:25:19
7036979312		000:02:30	13NOV97 14:26:56
7036979312		000:00:42	13NOV97 14:32:00
7036979312		000:00:08	13NOV97 14:37:31
7036979312		000:00:18	13NOV97 14:42:12
7036979312		000:00:44	13NOV97 14:49:37
7036979312		000:00:30	13NOV97 14:53:59
7036979312		000:02:39	13NOV97 15:04:13
7036979312		000:22:04	13NOV97 15:10:25
7036979312		000:04:17	13NOV97 16:29:31
7036979312		000:00:40	13NOV97 16:33:07
7036979312		000:00:14	13NOV97 16:34:18
7036979312		000:03:44	13NOV97 16:47:04
7036979312		000:00:11	13NOV97 17:22:43
7036979312		000:00:09	13NOV97 17:24:05
7036979312		000:00:05	13NOV97 17:24:32
7036979312		000:02:26	13NOV97 17:44:52
7036979312		000:07:04	13NOV97 18:23:35
7036979312		000:00:08	13NOV97 18:29:39
7036979312		000:05:42	13NOV97 18:50:34
7036979312		000:00:21	13NOV97 19:08:42
7036979312		000:00:50	13NOV97 19:47:46
7036979312		000:20:08	14NOV97 07:57:24
7036979312		000:00:29	14NOV97 08:27:55
7036979312		000:00:15	14NOV97 08:30:24
7036979312		000:00:05	14NOV97 08:42:40
7036979312		000:02:19	14NOV97 08:58:15
7036979312		000:00:16	14NOV97 09:12:24
7036979312		000:00:15	14NOV97 09:52:34
7036979312		000:00:35	14NOV97 09:53:36
7036979312		000:05:40	14NOV97 09:58:41
7036979312		000:12:01	14NOV97 10:03:29
7036979312		000:02:12	14NOV97 10:21:44
7036979312		000:02:04	14NOV97 10:23:39
7036979312		000:02:32	14NOV97 10:25:24
7036979312		000:05:34	14NOV97 10:43:37
7036979312		000:00:46	14NOV97 11:25:23
7036979312		000:00:22	14NOV97 11:26:21
7036979312		000:06:45	14NOV97 11:27:24
7036979312		000:00:36	14NOV97 12:06:25
7036979312		000:00:24	14NOV97 12:41:24
7036979312		000:00:22	14NOV97 12:53:47
7036979312		000:02:13	14NOV97 13:31:35
7036979312		000:00:28	14NOV97 13:57:07
7036979312		000:00:18	14NOV97 13:59:58
7036979312		000:00:50	14NOV97 14:00:45
7036979312		000:00:30	14NOV97 14:16:25
7036979312		000:00:43	14NOV97 14:22:10
7036979312		000:01:41	14NOV97 14:50:11
7036979312		000:00:10	14NOV97 15:02:44

833-DC-00017904

Bell Atlantic TEMPO MDR for 7036979312 per DTS-W Request dated 24 FEB 98

RIG_TN	DEST_TN	DURATION	Start date-time
036979312		000:00:41	10NOV97 16:33:48
7036979312		000:05:05	10NOV97 17:00:26
7036979312		000:00:22	10NOV97 17:04:28
7036979312		000:05:01	10NOV97 17:09:00
7036979312		000:08:50	10NOV97 17:17:19
7036979312		000:00:31	10NOV97 17:27:51
7036979312		000:00:10	10NOV97 17:29:09
7036979312		000:00:39	10NOV97 17:31:32
7036979312		000:00:39	10NOV97 17:53:47
7036979312		000:02:01	10NOV97 17:54:37
7036979312		000:00:12	10NOV97 17:58:51
7036979312		000:00:04	10NOV97 18:18:14
7036979312		000:00:45	10NOV97 18:18:33
7036979312		000:43:31	10NOV97 18:19:56
7036979312		000:03:41	10NOV97 18:49:56
7036979312		000:20:00	10NOV97 18:56:58
7036979312		000:00:26	10NOV97 19:11:44
7036979312		000:00:11	10NOV97 19:28:34
7036979312		000:00:08	10NOV97 19:32:24
7036979312		000:03:22	12NOV97 07:58:08
7036979312		000:15:41	12NOV97 08:00:21
7036979312		000:00:25	12NOV97 08:19:20
7036979312		000:00:44	12NOV97 08:28:44
7036979312		000:00:08	12NOV97 09:05:08
7036979312		000:00:03	12NOV97 09:23:18
7036979312		000:00:34	12NOV97 09:53:45
036979312		000:03:52	12NOV97 10:21:37
036979312		000:03:33	12NOV97 11:06:39
036979312		000:00:53	12NOV97 11:16:38
036979312		000:00:59	12NOV97 11:36:54
7036979312		000:01:55	12NOV97 11:56:20
7036979312		000:39:13	12NOV97 11:58:16
7036979312		000:00:21	12NOV97 12:30:44
7036979312		000:00:28	12NOV97 12:32:30
7036979312		000:05:37	12NOV97 12:51:15
7036979312		000:00:14	12NOV97 13:01:15
7036979312		000:01:46	12NOV97 13:36:36
7036979312		000:08:43	12NOV97 13:38:16
7036979312		000:00:08	12NOV97 13:44:01
7036979312		000:00:23	12NOV97 13:58:25
7036979312		000:00:07	12NOV97 14:05:56
7036979312		000:00:55	12NOV97 14:06:32
7036979312		000:25:24	12NOV97 14:30:02
7036979312		000:05:07	12NOV97 15:34:53
7036979312		000:01:57	12NOV97 15:39:09
7036979312		000:00:20	12NOV97 15:48:00
7036979312		000:00:09	12NOV97 15:53:26
7036979312		000:02:19	12NOV97 15:55:28
7036979312		000:01:55	12NOV97 17:26:27
7036979312		000:00:45	12NOV97 17:35:44
7036979312		000:00:11	12NOV97 17:37:54
7036979312		000:15:03	13NOV97 07:56:31
7036979312		000:02:04	13NOV97 08:12:56
7036979312		000:00:16	13NOV97 08:23:18
7036979312		000:00:05	13NOV97 08:33:18
7036979312		000:00:03	13NOV97 08:38:30
7036979312		000:00:04	13NOV97 09:02:32
7036979312		000:05:02	13NOV97 09:26:56
7036979312		000:00:31	13NOV97 09:59:21
7036979312		000:02:03	13NOV97 10:12:28

833-DC-00017903

Bell Atlantic TEMPO MDR for 7036979312 per DTS-W Request dated 12 MAR 98

ORIG_TN	DEST_TN	DURATION	Start date-time
6979312		000:00:33	17DEC97 08:23:16
6979312		000:40:48	17DEC97 08:46:20
7036979312		000:00:35	17DEC97 09:19:07
7036979312		000:01:49	17DEC97 09:20:40
7036979312		000:00:53	17DEC97 11:18:10
7036979312		000:03:28	17DEC97 11:24:58
7036979312		001:24:16	17DEC97 11:58:24
7036979312		000:00:32	17DEC97 12:54:28
7036979312		000:00:07	17DEC97 13:21:47
7036979312		000:06:48	17DEC97 13:22:25
7036979312		000:00:23	17DEC97 14:34:11
7036979312		000:45:19	17DEC97 14:44:27
7036979312		000:00:10	17DEC97 16:37:39
7036979312		000:00:40	17DEC97 18:17:29
7036979312		000:00:21	17DEC97 18:25:31
7036979312		000:05:02	17DEC97 18:32:11
7036979312		000:05:14	17DEC97 18:36:50
7036979312		000:00:20	17DEC97 18:58:34
7036979312		000:00:25	18DEC97 07:31:27
7036979312		000:00:46	18DEC97 07:48:28
7036979312		000:21:47	18DEC97 07:54:09
7036979312		000:00:22	18DEC97 09:17:25
7036979312		000:00:18	18DEC97 09:25:37
7036979312		000:00:26	18DEC97 10:59:54
7036979312		000:13:56	18DEC97 12:23:12
7036979312		000:20:22	18DEC97 15:05:11
7036979312		000:20:48	18DEC97 17:15:37
7036979312		000:00:16	18DEC97 17:28:44
6979312		000:00:54	18DEC97 17:29:27
6979312		000:15:03	19DEC97 07:59:35
7036979312		000:00:30	19DEC97 08:27:11
7036979312		000:15:38	19DEC97 09:07:29
7036979312		000:00:09	19DEC97 09:19:06
7036979312		000:00:06	19DEC97 09:19:21
7036979312		000:02:14	19DEC97 09:22:39
7036979312		000:02:16	19DEC97 09:25:23
7036979312		000:00:07	19DEC97 10:15:11
7036979312		000:00:44	19DEC97 10:17:34
7036979312		000:00:47	19DEC97 10:33:05
7036979312		000:25:22	19DEC97 10:52:42
7036979312		000:00:07	19DEC97 11:11:13
7036979312		000:00:30	19DEC97 11:12:31
7036979312		000:05:27	19DEC97 11:20:14
7036979312		000:00:28	19DEC97 11:39:52
7036979312		000:08:54	19DEC97 12:36:59
7036979312		000:07:22	19DEC97 12:54:07
7036979312		000:00:07	19DEC97 13:01:13
7036979312		000:11:58	19DEC97 13:02:10
7036979312		000:00:11	19DEC97 13:26:00
7036979312		000:00:22	19DEC97 13:35:13
7036979312		000:13:47	19DEC97 13:35:52
7036979312		000:01:50	19DEC97 13:47:32
7036979312		000:00:04	19DEC97 13:50:56
7036979312		000:02:31	19DEC97 13:54:06
7036979312		000:00:35	19DEC97 13:58:41
7036979312		000:00:32	19DEC97 13:59:37
6979312		000:07:16	19DEC97 14:15:58
6979312		000:01:56	19DEC97 16:09:21
6979312		000:00:10	19DEC97 18:03:59
7036979312		000:00:24	19DEC97 18:26:46

833-DC-00017890

Bell Atlantic TEMPO MDR for 7036979312 per DTS-W Request dated 12 MAR 98

ORIG_TN	DEST_TN	DURATION	Start date-time
36979312		000:12:15	01DEC97 07:42:18
36979312		000:30:06	01DEC97 07:59:10
7036979312		000:32:36	01DEC97 11:58:03
7036979312		000:13:25	02DEC97 07:41:34
7036979312		000:00:11	02DEC97 07:57:39
7036979312		000:13:41	02DEC97 07:57:58
7036979312		000:07:37	02DEC97 11:10:34
7036979312		000:04:08	02DEC97 11:52:42
7036979312		000:45:46	02DEC97 11:59:08
7036979312		000:00:12	02DEC97 18:28:45
7036979312		000:15:23	03DEC97 07:58:03
7036979312		000:37:28	03DEC97 12:04:02
7036979312		000:00:45	03DEC97 15:33:48
7036979312		000:02:14	03DEC97 15:34:55
7036979312		000:05:08	04DEC97 07:46:53
7036979312		000:09:02	04DEC97 07:57:46
7036979312		000:38:26	04DEC97 12:00:16
7036979312		000:02:16	04DEC97 15:23:01
7036979312		000:02:02	04DEC97 15:25:04
7036979312		000:06:40	04DEC97 16:44:07
7036979312		000:38:25	04DEC97 18:38:57
7036979312		000:09:15	05DEC97 07:44:23
7036979312		000:12:16	05DEC97 07:58:14
7036979312		000:38:58	05DEC97 08:07:06
7036979312		000:01:46	05DEC97 13:27:42
7036979312		001:20:32	05DEC97 13:30:28
7036979312		000:12:21	05DEC97 14:33:30
16979312		000:00:50	05DEC97 14:55:33
36979312		000:00:22	05DEC97 16:46:06
36979312		000:03:48	05DEC97 16:58:25
7036979312		000:00:12	05DEC97 17:47:29
7036979312		000:00:14	05DEC97 18:19:07
7036979312		000:00:44	05DEC97 18:26:56
7036979312		000:13:30	08DEC97 07:44:44
7036979312		000:22:01	08DEC97 07:59:12
7036979312		000:02:04	08DEC97 08:23:33
7036979312		000:10:58	08DEC97 08:56:30
7036979312		000:01:57	08DEC97 09:06:26
7036979312		000:00:17	08DEC97 10:08:26
7036979312		000:02:28	08DEC97 10:29:39
7036979312		000:05:10	08DEC97 11:03:29
7036979312		000:49:01	08DEC97 11:57:14
7036979312		000:00:08	08DEC97 13:05:35
7036979312		000:00:40	08DEC97 14:15:54
7036979312		000:00:10	08DEC97 14:31:45
7036979312		000:06:48	08DEC97 16:22:52
7036979312		000:00:28	08DEC97 16:32:37
7036979312		000:03:31	08DEC97 16:49:35
7036979312		000:00:50	08DEC97 17:09:31
7036979312		000:02:03	08DEC97 17:19:38
7036979312		000:00:08	08DEC97 17:41:35
7036979312		000:03:34	08DEC97 17:44:05
7036979312		000:00:08	08DEC97 18:10:14
7036979312		000:11:58	08DEC97 18:19:35
7036979312		000:00:50	08DEC97 18:31:27
75979312		000:29:10	09DEC97 07:58:29
6979312		000:01:51	09DEC97 09:41:21
6979312		000:02:33	09DEC97 09:52:26
6979312		000:21:41	09DEC97 10:05:26
7036979312		000:08:34	09DEC97 10:22:30

833-DC-00017886

Bell Atlantic TEMPO MDR for 7036979312 per DTS-W Request dated 12 MAR 98

ORIG_TN	DEST_TN	DURATION	Start date-time
7036979312		000:17:19	03NOV97 07:57:03
7036979312		000:18:42	03NOV97 08:15:00
7036979312		000:00:12	03NOV97 09:21:27
7036979312		000:02:00	03NOV97 10:02:54
7036979312		000:00:09	03NOV97 10:49:07
7036979312		000:00:04	03NOV97 11:16:01
7036979312		000:06:52	03NOV97 11:28:00
7036979312		000:30:05	03NOV97 12:00:35
7036979312		000:00:36	03NOV97 12:20:53
7036979312		000:00:25	03NOV97 12:26:46
7036979312		000:00:14	03NOV97 12:58:31
7036979312		000:00:15	03NOV97 13:02:09
7036979312		000:00:12	03NOV97 13:24:14
7036979312		000:05:24	03NOV97 13:34:28
7036979312		000:01:48	03NOV97 13:41:00
7036979312		000:00:04	03NOV97 14:51:19
7036979312		000:01:59	03NOV97 15:47:04
7036979312		000:00:21	03NOV97 16:04:47
7036979312		000:00:30	03NOV97 16:53:26
7036979312		000:02:21	03NOV97 17:06:25
7036979312		000:00:06	03NOV97 17:08:41
7036979312		000:00:05	03NOV97 17:09:19
7036979312		000:00:06	03NOV97 17:12:45
7036979312		000:00:08	03NOV97 17:33:36
7036979312		000:04:01	03NOV97 18:01:40
7036979312		000:00:21	03NOV97 18:11:55
7036979312		000:13:51	03NOV97 18:15:39
7036979312		000:00:10	03NOV97 18:24:56
7036979312		000:01:49	03NOV97 18:50:25
7036979312		000:00:15	03NOV97 18:54:17
7036979312		000:00:15	03NOV97 18:56:15
7036979312		000:00:41	03NOV97 18:57:28
7036979312		000:00:18	03NOV97 18:58:17
7036979312		000:20:07	04NOV97 07:56:10
7036979312		000:00:42	04NOV97 09:05:05
7036979312		000:00:59	04NOV97 09:12:30
7036979312		000:06:57	04NOV97 10:05:21
7036979312		000:00:28	04NOV97 11:01:00
7036979312		000:00:24	04NOV97 11:18:58
7036979312		000:35:21	04NOV97 11:47:46
7036979312		000:01:47	04NOV97 12:09:16
7036979312		000:00:28	04NOV97 12:41:22
7036979312		000:01:53	04NOV97 12:47:54
7036979312		000:00:38	04NOV97 14:13:06
7036979312		000:03:49	04NOV97 14:28:01
7036979312		000:07:38	04NOV97 15:06:28
7036979312		000:20:58	04NOV97 15:11:47
7036979312		000:02:35	04NOV97 15:27:47
7036979312		000:00:09	04NOV97 15:49:00
7036979312		000:03:32	04NOV97 15:54:16
7036979312		000:06:59	04NOV97 16:40:12
7036979312		000:00:39	04NOV97 16:44:52
7036979312		000:00:34	04NOV97 16:50:29
7036979312		000:00:54	04NOV97 16:51:15
7036979312		000:03:28	04NOV97 17:06:52
7036979312		000:04:17	04NOV97 17:15:14
7036979312		000:00:07	04NOV97 17:20:06
7036979312		000:01:57	04NOV97 17:25:16
7036979312		000:00:49	04NOV97 17:45:41
7036979312		000:04:10	04NOV97 17:58:10

age: 1

833-DC-0001782

21716

Bell Atlantic TEMPO MDR for 7036979312 per DTS-W Request dated 12 MAR 98

OPTG_TN	DEST_TN	DURATION	Start date-time
7036979312		000:03:33	15OCT97 17:39:08
7036979312		000:03:20	15OCT97 18:21:22
7036979312		000:00:53	16OCT97 07:36:58
7036979312		000:23:57	16OCT97 07:56:34
7036979312		000:01:48	16OCT97 08:35:23
7036979312		000:08:44	16OCT97 08:36:36
7036979312		000:00:55	16OCT97 08:47:56
7036979312		000:18:48	16OCT97 09:31:19
7036979312		000:01:59	16OCT97 10:49:51
7036979312		001:05:20	16OCT97 11:59:39
7036979312		000:00:28	16OCT97 13:18:17
7036979312		000:00:16	16OCT97 14:48:20
7036979312		000:05:25	16OCT97 17:33:13
7036979312		000:03:32	16OCT97 17:50:52
7036979312		000:13:21	16OCT97 18:07:33
7036979312		000:00:18	16OCT97 18:42:45
7036979312		000:00:21	16OCT97 18:48:40
7036979312		000:00:12	16OCT97 18:50:01
7036979312		000:05:02	16OCT97 18:52:38
7036979312		000:00:05	16OCT97 18:56:39
7036979312		000:01:49	16OCT97 19:12:32
7036979312		000:00:53	16OCT97 19:14:52
7036979312		000:00:23	16OCT97 19:23:01
7036979312		000:01:46	16OCT97 19:24:55
7036979312		000:28:44	16OCT97 19:36:30
7036979312		000:01:52	16OCT97 19:54:29
7036979312		000:19:11	17OCT97 07:58:06
7036979312		000:00:29	17OCT97 09:04:08
7036979312		000:04:05	17OCT97 10:35:35
7036979312		000:00:26	17OCT97 11:10:54
7036979312		000:00:18	17OCT97 11:16:42
7036979312		000:02:28	17OCT97 11:18:44
7036979312		000:00:10	17OCT97 11:34:48
7036979312		000:00:14	17OCT97 12:50:56
7036979312		000:00:14	17OCT97 13:06:23
7036979312		000:03:20	17OCT97 13:23:31
7036979312		000:00:11	17OCT97 14:33:47
7036979312		000:00:06	17OCT97 14:51:01
7036979312		000:00:47	17OCT97 14:56:26
7036979312		000:13:28	17OCT97 15:18:48
7036979312		000:00:29	17OCT97 15:32:49
7036979312		000:00:27	17OCT97 15:41:14
7036979312		000:00:08	17OCT97 15:52:02
7036979312		000:00:19	17OCT97 15:52:43
7036979312		000:00:04	17OCT97 15:59:04
7036979312		000:00:53	17OCT97 16:09:29
7036979312		000:02:18	17OCT97 16:11:25
7036979312		000:00:52	17OCT97 16:19:41
7036979312		000:00:59	17OCT97 16:41:23
7036979312		000:00:37	17OCT97 17:07:48
7036979312		000:00:19	17OCT97 18:21:01
7036979312		000:00:53	17OCT97 18:22:10
7036979312		000:10:38	17OCT97 18:26:20
7036979312		000:00:36	17OCT97 18:41:52
7036979312		000:00:47	17OCT97 18:44:25
7036979312		000:00:11	17OCT97 19:16:08
7036979312		000:00:05	20OCT97 06:25:13
7036979312		000:00:05	20OCT97 06:37:23
7036979312		000:30:55	20OCT97 07:55:39
7036979312		000:05:19	20OCT97 08:25:45

Bell Atlantic TEMPO MDR for 7036979312 per DTS-W Request dated 12 MAR 98

ORIG_TN	DEST_TN	DURATION	Start date-time
6979312		000:00:07	06OCT97 10:43:23
6979312		000:00:45	06OCT97 10:44:18
6979312		000:00:10	06OCT97 10:48:23
7036979312		000:00:24	06OCT97 11:06:25
7036979312		000:00:51	06OCT97 11:07:12
7036979312		000:03:56	06OCT97 11:54:36
7036979312		000:00:59	06OCT97 12:24:25
7036979312		000:05:16	06OCT97 15:34:01
7036979312		000:05:53	06OCT97 15:44:17
7036979312		000:02:23	06OCT97 15:54:16
7036979312		000:00:05	06OCT97 16:05:48
7036979312		000:07:00	06OCT97 16:16:42
7036979312		000:02:30	06OCT97 16:27:59
7036979312		000:22:10	07OCT97 07:55:15
7036979312		000:00:13	07OCT97 09:24:05
7036979312		000:02:09	07OCT97 09:37:54
7036979312		000:04:10	07OCT97 09:59:36
7036979312		000:01:51	07OCT97 10:53:05
7036979312		000:00:01	07OCT97 11:09:53
7036979312		000:00:33	07OCT97 11:15:57
7036979312		000:33:53	07OCT97 11:55:11
7036979312		000:18:23	07OCT97 12:21:59
7036979312		000:00:07	07OCT97 13:10:26
7036979312		000:00:48	07OCT97 13:37:38
7036979312		000:00:27	07OCT97 14:01:11
7036979312		000:00:13	07OCT97 15:02:07
7036979312		000:00:50	07OCT97 15:02:41
6979312		000:00:43	07OCT97 15:05:09
6979312		000:00:48	07OCT97 15:10:03
6979312		000:02:05	07OCT97 16:11:13
6979312		000:00:09	07OCT97 16:38:13
7036979312		000:00:54	07OCT97 16:50:20
7036979312		000:05:53	07OCT97 17:20:28
7036979312		000:00:10	07OCT97 17:49:23
7036979312		000:00:09	07OCT97 18:35:07
7036979312		000:15:12	08OCT97 07:58:48
7036979312		000:15:49	08OCT97 08:12:50
7036979312		000:07:03	08OCT97 08:24:12
7036979312		000:01:56	08OCT97 10:34:44
7036979312		000:09:09	08OCT97 11:38:43
7036979312		000:35:10	08OCT97 11:44:57
7036979312		000:00:46	08OCT97 13:05:27
7036979312		000:01:54	08OCT97 13:07:28
7036979312		000:08:20	08OCT97 13:10:54
7036979312		000:05:02	08OCT97 13:17:55
7036979312		000:01:43	08OCT97 13:42:46
7036979312		000:00:20	08OCT97 14:00:29
7036979312		000:03:51	08OCT97 14:01:21
7036979312		000:05:23	08OCT97 14:13:19
7036979312		000:01:57	08OCT97 16:32:15
7036979312		000:00:26	08OCT97 16:34:08
7036979312		000:00:35	08OCT97 17:41:11
7036979312		000:00:45	08OCT97 17:42:20
7036979312		000:00:20	09OCT97 07:28:19
7036979312		000:48:30	09OCT97 07:56:46
36979312		000:00:24	09OCT97 09:20:27
36979312		000:00:04	09OCT97 09:24:00
5979312		000:08:56	09OCT97 09:37:44
6979312		000:17:26	09OCT97 10:19:43
7036979312		000:10:26	09OCT97 10:38:20

2627

CLIENT ✓ COA	CALL BY: Monica	DATE: 10-28
	REF # 837-DC-00000004	COURIER # 25
FROM Frontagon Mall [REDACTED]	TIME IN 3:00	
	TIME OUT 5:59	
TO: SW Gate White House	SERV. TYPE:	
Jessica L... Jessica - x-1	CHARGES 10 -	

2628

CLIENT		REF. # [REDACTED]		COURIER #	
FROM:		TIME IN:		TIME OUT:	
TO:		SERV. TYPE:		CHARGES:	
SIGNATURE		X		F	

DC-00000003

 (202) 638-5533

2629

CLIENT <i>COP</i>	CALL BY <i>MONICA LEWIS</i>	DATE <i>1/1/07</i>
	REF # <i>[REDACTED]</i>	COURIER # <i>38</i>
FROM <i>BY/AM</i>	<i>Pentagon Mall</i> 837-DC-00000002	TIME IN <i>1002</i>
TO	<i>WIFE Betty Lewis</i> <i>HOUSE 5 W STATE</i>	TIME OUT <i>1215</i>
 SPEED SERVICE COURIERS ★ (202) 638-5533	SIGNATURE <i>[Signature]</i>	CHARGES <i>10.-</i>

2630

CLIENT

CCP

CALL BY:

Monica Lewinsky 10-7

DATE:

REF. #

COURIER #

FROM:

BY 11AM Perotagen - Mail

TIME IN

1002

TIME OUT

1215

TO:

sw Gate house

SERV. TYPE:

837-DC-00000001

Betty Curmy

CHARGES:

\$10. —

#

2631

01
/ ~~11/11/2001~~ <22

837-DC-00000005

2632

CLIENT ✓ C.O.P.	CALL BY: MONICA	DATE: 11-3
	REF. #	COURIER # 33
FROM: [REDACTED] ^{MAIL} Pentagon SWS Gate C.O.P. @ 15.00		TIME IN: 4:13
		TIME OUT: 5:00
TO:	SWS Gate White House	SERV. TYPE: RUSH PLUS
Ⓟ	837-DC-00000006	CHARGES:

2633

CLIENT COP	CALL BY: MONICA	DATE: 3 Nov 97
	REF. #	COURIER # 33
FROM: Pentagon Mall ENT. ROOM 1207 Monica [REDACTED]	WAT	TIME IN: 4:13
TO: White House SW Gate White House [REDACTED]	837-DC-00000007	TIME OUT: 5-
 (202) 638-5533	SIGNATURE [Signature]	CHARGES: \$15.00

2634

CLIENT	CALL BY	DATE
<i>Cof</i>	<i>Monica</i>	<i>11/12</i>
	REF #	COURIER
		<i>3/1/73</i>
FROM	837-DC-00000008	TIME IN
<i>Per togen Mall</i>		<i>1115</i>
TO:	<i>Su Gate</i>	TIME OUT
		<i>150</i>
	RUSH	SERV TYPE:
		PLUS
		CHARGES:
<i>(i)</i>	<i>130</i>	<i>15.00</i>

2635

CLIENT ✓ COP	CALL BY MONICA	DATE 11-12
	REF # [REDACTED]	COURIER # 23
FROM Pentagon mall		TIME IN 1:00P
		TIME OUT 2:00P
TO 837-DC-00000009	SW gate [REDACTED]	SERV. TYPE RUSH PLUS ON PICK-UP
	[REDACTED]	CHARGES 15.-
	SIGNATURE [REDACTED]	

(202) 838-5533

2636

✓ JLF	[REDACTED]	COURIER # 21
FROM:	TIME IN 7:00	
TO: 837-DC-00000010	TIME OUT 7:30	
[REDACTED]	SERV. TYPE:	
 X SIGNATURE (202) 638-5533	CHARGES 15	

2637

CLIENT

C.O.P.

CALL BY:

MOWIEA

DATE

11-20

REF. #

COURIER

12

FROM:

TIME IN

9:54

Pentagon MAU

TIME OUT

10:54

TO:

SERV TYPE

837-DC-00000011

SW Gate

RUSH

PLUG

CHARGES

5'6" - 170 lbs

ms xif

2638

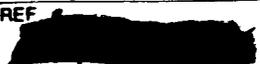
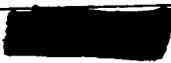
CLIENT	CALL BY MONICA	DATE 11/27/98
COP	REF [REDACTED]	COURIER # 12
FROM 837-DC-00000012		TIME IN 9:24
PENTAGON - MAIL		TIME OUT 10:24
TO [REDACTED]		SERV TYPE PLUS
WHITE HOUSE - SW GATE	RUSH	
 SPEED SERVICE COURIERS ★	SIGNATURE [Signature] MS. SELF	CHARGES 15.1
(202) 638-5533		

2638

2639

CALL BY: J. D. WICK		DATE: 11/25/01
REF: [REDACTED]	COURIER # 13	
FROM: [REDACTED]	TIME IN: 9:51	
SENTAS-N-MALL 837-DC-0000013	TIME OUT: 10:04	
TO: [REDACTED]	SERV. TYPE:	
WHITE HOUSE - W GATE		
 (202) 638-5533	SIGNATURE: [REDACTED]	CHARGES: 15.1

2640

CLIENT <i>Cof</i>	CALL BY: <i>MONICA</i>	DATE: <i>11-21</i>
	REF: 	COURIER # <i>12</i>
FROM: <i>Pentagon - mall</i>	<i>ATL, VA</i>	TIME IN <i>8:18</i>
		TIME OUT <i>15-</i>
TO: <i>White House SW gate</i>	SERV TYPE:	
<i>8</i>	837-DC-00000014 	CHARGES: <i>\$ 10.-</i>

2641

CLIENT COP	CALL BY MUNIA	DATE 11/21/97
	REF # [REDACTED]	COURIER # 12
FROM 837-DC-00000015		TIME IN 8:18
PENTAGON - MALL ENT.		TIME OUT 10 -
TO WHITE HOUSE - SW GATE		SERV TYPE
 (202) 638-5533	SIGNATURE Justin [unclear] COLEMAN	CHARGES 10. -

2642

CLIENT		11/21/07
REF #	[REDACTED]	COURIER # 12
FROM:	837-DC-00000016 PENTAGON - MAIL - INT	TIME IN: 7:00
TO:	WHITE HOUSE - WHITE	TIME OUT: 8:00
SPEED SERVICE COURIERS ★ (202) 638-5533		SERV. TYPE:
SIGNATURE [Signature]		CHARGES: 0 -

2643

CLIENT <i>CP</i>	CALL BY <i>ANNIA</i>	DATE <i>12-8</i>
	REF. # [REDACTED]	COURIER # <i>30</i>
FROM: <i>So Pentagon - Mail</i>	<i>ANNIA</i>	TIME IN: <i>825</i>
		TIME OUT: <i>1025</i>
TO: <i>SW Gate</i>		SERV. TYPE:
837-DC-00000017		CHARGES: <i>\$ 10.-</i>

2644

CLIENT <i>COF</i> <i>Monica</i>	CALL BY <i>MONICA</i>	DATE <i>12/5</i>
	REF [REDACTED]	COURIER # <i>7c</i>
FROM <i>Pentagon Mall</i> 837-DC-00000018		TIME IN <i>8²⁵</i>
TO <i>W. H. S. W. Gate</i> [REDACTED]		TIME OUT <i>10²⁵</i>
		SERV TYPE
 (202) 638-5533	SIGNATURE <i>[Signature]</i> <i>Self</i>	CHARGES <i>10.-</i>

2645

CLIENT <i>CP</i>	CALL BY: <i>FRANCIS</i>	DATE:
	REF: [REDACTED]	COURIER #
FROM:	837-DC-0000019	TIME IN: <i>2:25</i>
		TIME OUT: <i>3:25</i>
TO:	[REDACTED]	SERV. TYPE:
 (202) 638-5533	X _____ SIGNATURE	CHARGES: <i>10</i>

2646

CLIENT <i>COP.</i>	CALL BY: <i>MONICA</i>	DATE: <i>14 JAN 98</i>
	REF: [REDACTED]	COURIER # <i>33</i>
FROM: <i>700 New Hampshire Ave.</i>	TIME IN: <i>1037</i>	TIME OUT: <i>1201 / 1236</i>
TO: [REDACTED] <i>for Mr. Lewinski #1949</i>	SERV. TYPE: 837-DC-00000024	CHARGES: <i>15</i>
SIGNATURE: _____		



(202) 638-5533

2647

CLIENT ~~West~~

CALL BY: MONICA

DATE: 7-14

LEWINSKY

REF # [REDACTED]

COURIER # 33

FROM:

[REDACTED]

TIME IN: 10:37

PAGE

[REDACTED]

TIME OUT: 12:36

TO:

(12) (12)

[REDACTED]

SERV. TYPE: 1236

OPEN 12:00 ✓

837-DC-00000023

CHARGES:

9/5.00

2648

CALL BY		DATE
RE [REDACTED]		COURIER #
FROM:		TIME IN:
		TIME OUT: 7:12
TO:	837-DC-00000022	SERV. TYPE:
SIGNATURE		CHARGES:
x		

 (202) 638-5533

2649

CLIENT	CALL BY	DATE
<i>CL Montica</i>	<i>MONICA</i>	<i>1: 6</i>
REF	COURIER #	
[REDACTED]	<i>3c</i>	
FROM	TIME IN	
<i>Pentagon Mall</i>	<i>825</i>	
	TIME OUT	
	<i>942</i>	
TO	SERV TYPE	
<i>17 23 N/Hamp</i>	<i>837-DC-00000021</i>	
<i>bro</i>		
	SIGNATURE	CHARGES
<i>x</i>	<i>Proctor</i>	<i>10.-</i>
(202) 638-5533		

2650

CLIENT COP	CALL BY: MONICA	DATE: 10 8
	REF. #	COURIER # 32
FROM: Perotagon - Melle	AMM	TIME IN: 825
		TIME OUT: 942
TO: 1333 N. Main St		SERV. TYPE:
837-DC-00000020		CHARGES: 4 10

837-DC-0000025		COURIER	CHECK/ CASH	MILES	TOTAL	✓ RECEIVED
9-21	[REDACTED]	30	✓		30-	✓ x a. 26
9-26	[REDACTED] MD	30	✓		10-	✓ x a. 27
9-29	[REDACTED]	30			10-	✓ } 10/1
9-30	[REDACTED]	33			20-	✓ } 10/1
1-30	[REDACTED]	24			10-	Deduct
10-1	[REDACTED]					
10-1	[REDACTED]	23			7-	Deduct
10-7	Restoration Mill VA → SN GATE WH.	30			10-	✓ x 10/7
10-7	[REDACTED]	27			10-	Deduct
10-7	[REDACTED]	33			10-	✓ } 10/7
10-7	[REDACTED] MD	30			14-	✓ } 10/7
10-7	[REDACTED]	30			20-	✓ } 10/7
10-7	[REDACTED]	28			7-	Deduct
10-15	[REDACTED]	30	HOLIDAY		27-	✓
10-14	[REDACTED]	33	✓	STATION	27-	✓ x 10/14
10-16	[REDACTED]	28			7-	✓
10-21	[REDACTED]	30			10-	✓ } 10/21
10-21	[REDACTED]	30			14-	✓ } 10/21
10-28	[REDACTED]	35	✓		10-	✓ } 10/28
10-27	[REDACTED]	31	RUS-		27-	✓ } 10/27
10-22	[REDACTED]	33			10-	✓ } 10/22
10-21	[REDACTED]	28			10-	✓ } 10/21
10-21	[REDACTED]	24			10.50	✓ } 10/21
10-27	[REDACTED]	33			15-	✓ } 10/27
10-28	[REDACTED]	31			10-	✓ } 10/28

DATE	837-DC-0000026	COURIER	CHECK / CASH	MILES	TOTAL	RECEIVED
[REDACTED]	[REDACTED]	31			10.-	
[REDACTED]	[REDACTED]	31			36.-	Jan 10
11-5	Pentagon → SW GATE	33			15.-	
11-4	[REDACTED]	30			14.-	
11-4	[REDACTED]	30			35.-	
1-4	[REDACTED]	31			22.-	
11-5	[REDACTED]	31			10.-	
11-5	[REDACTED]	29			10.-	
1-6	[REDACTED]	34			7.-	Deduct
1-7	[REDACTED]	33			10.-	
11-10	[REDACTED]	31			16.-	
1-	Pentagon → White House	31			15.-	
1-	[REDACTED]	35			10.-	Jan 11-14
11-14	[REDACTED]	33			10.-	
1-17	[REDACTED]	31			12.-	
11-17	[REDACTED]	12			12.-	Jan 11-19
1-17	[REDACTED]	12			14.-	
1-19	[REDACTED]	33			16.-	Jan 11-20
1-20	Pentagon → SW GATE	32			15.-	
1-21	" "	12			10.-	Jan 11-21
1-22	[REDACTED]	33			12.-	
1-24	[REDACTED]	29			7.-	
[REDACTED]	[REDACTED]	10			16.-	Jan 11-24
[REDACTED]	[REDACTED]	29			40.-	
[REDACTED]	[REDACTED]	35			30.-	Jan 11-24

610

DATE	837-DC-00000027	COURIER	CHECK/CASH	MILES	TOTAL	✓	RECEIVE
11-25	[REDACTED]	28			40		11-29
11-26	[REDACTED]	30	\$		29		11-28
11-26	[REDACTED]	35	✓		14		11-28
11-26	[REDACTED]	12			7		
1-2-6	[REDACTED]	23			7		
2-2	[REDACTED]	35			14		12-2
2-2	[REDACTED]	35			14		
2-3	[REDACTED]	29	✓		60		
2-4	[REDACTED]	21	✓		7.50		12-4
12-5	[REDACTED]	29	\$		10		Deduct
12-5	[REDACTED]	33			16		12-8
12-5	Penitentiary - Small Hall → 1332 N. Grand → BIV GATE.	30			20		
12-8	[REDACTED]	23			7		12-12
12-15	[REDACTED]	30			14		12-17
12/16	30 N Grand St. [REDACTED]	33		32 14	46		
12/16	[REDACTED]	34			14		Deduct
12/17	[REDACTED]	21			10		
12/17	[REDACTED]	33			15		
12/17	[REDACTED]	35			10		
12/19	[REDACTED]	31			30		12-22
12/23	[REDACTED]	30			15		12-21
12/29	[REDACTED]	12	✓		10		
12-31	[REDACTED]	34			14		Deduct
12/31	[REDACTED]	12			12		
12/31	[REDACTED]	30			10		
12/31	[REDACTED]	30			10		12



U. S. Secret Service Epass Access Control Report

Date of report:

01/27/98

Search Criteria: MONDALE, ELEANOR

Search Dates: 07/01/97 to 12/31/97

Date	Time	Name	Badge	Type	Post	Status
07/20/97	14:09:09	MONDALE, ELEANOR	346672	A	A4	ENTERING
07/20/97	16:26:56	MONDALE, ELEANOR	346672	A	A4	EXITING
12/06/97	09:32:57	MONDALE, ELEANOR	34667A	A	A4	ENTERING
12/06/97	10:46:08	MONDALE, ELEANOR	34667A	A	A4	EXITING

843-DC-00000004

202507

Aug - greet suit

fulcrum

Sep - Oct -

Mid Nov.

end of Dec 31st "day"

1st week Dec - signed picture
in back office -

845-DC-00000002

3^d wk in Dec - "hi Kiddo"

↳ White House Staff

Dec party in the
21st afternoon -

10 days later = 31 Dec 97

rest on 7 days later

Weekend - Sun called

1 1/2 later Snowing at 2:40 -

~~10/3~~ Blizzard of '96

she went to work =

waited by, come on in -

closed door - 45 minutes

guard there - heavy session

Jan 7

Jan MLK Day - at latter
for the day

" Really
Had to have someone
die under your executive
order" " Chewies time
w/ her - true zips"
near alone
~~Buddy coming 1/2 hour~~

Nancy ofc -
fooled around -
joking off ^{with back cause} ~~dim was~~ ^{loled.}

21st Jan 96

27 Jan
ofc -
she was in
Jan 27
gone Monday

AA Tues -
Barewell
to
Pat

(fooled around first)

1/2 hour - finished
 "Will you call me?"
 Recited # -

met in hall - walked
 in together -

20 mins. later

Called @ ofc

"had a really nice
 time"

Calls

Tues. night

(Bala gave Tues & Wed)

enjoyed talking to
~~her~~

have to go help
 homework - called
 from "home"

next day were better

Midnight
 called next night
 in the middle of
 night - from bed -
 phone sex 20-30 minutes
 7th feb

~~do~~ no contact
 President's tail 19 feb -
 was 11:00 ~~am~~ ^{max} am. at home
 she going to work -
 was

19 feb she went straight to
 knocked on door -

closed door - ~~jump~~

dumped her =

845-DC-00000007

I love her

I've hurt them both

so need before

ofc - ~~at~~

went to back - bugged

next weekend
or

2 wks later -

ran into him w/
Natalie - didn't call -

The day he signed Cuba
~~Summit~~ ^{thing} Libertod

Saxatins
against
Cuba -

receiving line

Mark ~~and~~ then he went
that afternoon Summit
in Egypt = funded.

The Bula & exit ^{were} in Bacai

that weekend he
golped at Sunday

{ screening at 8:00
(theater stuff at
night -
waited til
10:00

next week - Bela gone
to Boston area

Monday - ^{she is} passed

jogging - Dip Room
walked by
ignored him.

11:00 A.M. -
Tues. called on
house phone
to see Potus didn't
occur showed on
phone.

Thursday: Slept

Friday am.
jogging

returned -
elevator Passed
Carpenter Marcus
Dr.

participate or rest of
for day -

P.M. - Harold & Bruce
Hi Marcus

845-DC-00000010

Sun: put ^{into} Mary ^{not Sat.}
 (- fooled around - blue & white tie)
 told about ^{Wesley}

Tue:
 Alexander position

Nary said - Ron Brown
 family on Sat -
 coming to see Potus -
 call me Monday -

~~6:00 AM~~

6:00 Sedy might be
 called at home -

- Come over - -

845-DC-00000012

Romantic.

if I win in Nov.

I'll have you back like

that! fooled around.

phone call from Dick

Morris - head on phone

Harold came in -

He went out a piece good

" called at
7:00 @ home "

Why did you leave?
Came back & you weren't
here??

845-DC-00000013

you call Walter -
I'll bet it had something
to do w/ me

Monday - met w/ Nancy
Very sweet - Cried -
conscientious worker -

as ~~she~~ she left, Betty
asked what was wrong.

Betty hugged her -

Something in E (1) happen
for a reason -

Friday - ^{he} called ^{her} at
home - she was hysterical
& found out what happened.

845-DC-00000014

11. visitants

Evelyn Lubein

Maisha & Nary bound
out -

→ had gotten different
accounts. He was
paying too much attention
she's got to go -

after election
doesn't care -

if you don't like
it, get you a job
on the campaign

will call you later -

3:00 AM. promised
to call, made
wkd myself wate up -

swat call

19a20
left Sun to go 6-7
appt Tokyo - then Russian
Sun. night returned =

2012

Mandy xite - called
after trip - hates job -

not want see you
Seen APAC thing

dy itta
MOM and shorts NO-

11-12 PM. out of town
Thurs night - he called
at home - phone sex -
promise I'd call this
weekend.

didn't call.

3:00 AM
MOM's night -
apology call
sich can't talk

APAC
there

845-DC-00000015

May - Saxophone doesn't
key & miss - I miss you

1 wk goes by -
10 DAYS to next phone call

Phone sex

Week later ^{he called} - Brenda
committed suicide -

he was upset =

with
event
mg

Coming to Pentagon ^{prison}
visited her ^{to see}

he called that night ^{she left that} - ^{night}
for a week - phone sex

1 1/2 wk later (following)
"hello" on tape (guides)

Called Wash. prison to
big driver -

845-DC-00000016

Betty called next
AM at work - re
Radio address =

845-DC-00000017

wants to meet her
family - Dad &
Stepmother were
coming

Radio tape on Friday
w/ parents

Sat. June 23?
next weekend - called
just to talk -

She
leaves for Bosnia to
July 5

July 5 calls that
night -

Weird phone sex =
short 20 min
jerked off keep
just talking

July 1972 - called
0182 bus 6:30 -

Baba out of town
July 5 -

845-DC-00000018

6:30 AM
Leaving for Olympics
that day -

phone sex - after
Well, Good Morning! came

promised to call
while he was away -
didn't call on Birthday
next week I called on
Sunday -
Australia night

speed away
phoned & apologized 8:30
for Birthday pm.
short: July 30th

Ball seen Aug 4 =
Pink Suit - afternoon
stewie like away 45 minutes
with phone
5:45

Vacation - 1 WK -

Aug - ~~2~~ ~~days~~ taken
day before travel
21st Departure - for conversion
6:00 p.m.
phone sex -
in his eye

Her 250th pleased to
19 Aug. Birthday party NY

NY jewelry - touched
grabbed his die
sent tie for B'day.

~~Sep 5~~

845-DC-00000019

Sep 5 - called from
good conversation road - at
home - phone sex

Sep 10²⁷ - kept msg -
to me -

~~20~~ 20-30th ^{she was in} 10:00 AM, 1200.

Sep 30th Called again
Saw you walking -
good conversationalist

At Sep 5. phone sex
"NO WAY" (will you
[ever marry me to me])
when you get to
my eye, everything
has consequences"

fight about it!
do you want me
to not call you
anymore?

Barbara
not there
Michael
2:30 AM

Oct. 22nd weedy
in florida
he
really into phone
sex.
Michael

"Triple C" hotels

Black suit

845-DC-00000021

Tues. Oct. - ^{Baba not here} DC - he
next night - event

next day - ~~you~~

tell Betty to

walk helicopter

^{waited in} West Wing Lobby -

Betty told her Evelyn
Siberman didn't
like it.

Wed. Sunday - Rally -
protest.

OCT 23 -

welcome home at WH
'following election'

6 wks later -

night before the visit.

Dec 2nd

phone
sex -

3 wks.

Christmas party Tues.

next night - he calls -
everyday can't be

sunshine -
preser - has something
come by on Sat.

never called -

to search him at Nutcracker

Called Monday -

Jan 1997 saw I missed you - next yr
away for New York
East

Jan 18th - he calls -

Jan 12 phone sex
had to push
M. nap - present ^{here}
See you
etc.

Inaugural - red dress

~~Jan~~ -
Feb 8th - noon
Snowing -
come in for present.
Betty can't see in -

sick over this
think about this
all the time
in present ^{should call}

845-DC-00000023

he called last -
phone sex -

~~Val. at~~ ^{had him}

Betty called ofc
to write radio address

Feb 28th go to radio
address -

slight phone - embassy
hat pin tapping
Book fees & wages
out
fool around.

Mar 13th

got at phone at
work - want to
see you tomorrow

Aimee
leaving for Florida
Jordanian shot

concerns from Nancy & Steven

Mar 30th crutches

Betty

Visit, go out

28 feb - didn't want
to come
addiction -

Mar 30 cried -

fighter
phone
he April 24th
called -

Thursday 23 May -

2677

845-DC-00000188

Handwritten notes:
P.T. 1/2
14 July 1966
C. M. ...
...
...

2678

Letters Editor
Newsweek
251 West 57th Street
New York, New York 10019-1894

(BY FAX: 212.445.4120)

I would like to clarify the questions that have arisen about my involvement in the matter reported by Newsweek in its August 11th edition. Contrary to the perception held by many that I granted Newsweek "an interview" for this story, the truth is the reporter appeared, uninvited and unannounced, in my office at the Pentagon in late March 1997. I was compelled to respond when he asserted that Ms. Willey had given him my name, as a purported contemporaneous witness who could corroborate her new claim of "harassment" or "inappropriate behavior" on the part of the President.

My response then, as it remains today, was that this was completely inaccurate and that her version in 1993 and her version in 1997 were wholly inconsistent. One must wonder how such disparate allegations spanning a period of four years could have much, if any, credibility.

Regarding the comment made by the President's attorney about me, which appeared in the same article, I am acutely disappointed that my integrity has been questioned.

Linda R. Tripp
Department of Defense
Washington, D.C. 20301-1400

[REDACTED]

[REDACTED]

Ann McDermott [REDACTED]

845-DC-00000190

Trainer - broke off at 9:30
Robin Byrd - walking in at same time

July 4
July 24
Amy Nelson
Stats
Mailing
Black Red
yellow

Aug 16
9:00
T shirt
socks shoes
tennis shoes

picture frame
Jigsaw
& Reproduction

1)
 says he is
 "paranoid"
 right now.
 gate -
 car comes out
 Robin Weary
 5:30 pm.

17 Sep - Betty call
 her @ 2:00ish & says
 he had asked her if
 she had gotten the
 Black Day stuff to M,
 & to let her know
 that now John Polenta
 was working on getting
 her back - & when
 Betty said M might
 also want to move
 to NY, he said "oh
 that's easy, she she
 can work for rebuffer
 Bill Richardson" - her

M met Betty
 at the gate
 after work -
 - received
 - many
 2 T shirts
 turquoise & 1 white
 1 green cotton dress.
 strange
 badge
 I
 fed up
 off
 himself

Sept. 15
 Betty call me
 from his home @ -
 & asks if M knows
 about a woman
 who had a KW
 experience - he is
 trying to find out
 who she is. all he
 knows is that
 she is married,
 they don't live
 in Washington,
 she is a
 smart, savvy
 professional
 woman w/ a
 "Chief in Chief" -
 happened in
 1998 - during
 Iraq war time,
 she received
 "a flurry of phone
 calls" from his at

... from ...

Moz dumped
4 July - nice

March 28
Liberated -
Newbie
Feb 28 radio address

Older
Brown
Crawford

Friday, September 12 that gate, hour and a half -- repeated calls to office, finally she came out and got her -- long talk, he left. She poked to him before she left and told him XX was hysterical and at the gate and that she would clear her in and determine if she was a "crazy woman" --

apr 5
fired

apr 7
196

interview

Called
at
6:00 ->

Serv
with

- Hooker -
she went
+ that ran out
back door
cause Harold
came in

Sept 14 Sunday night -- her plane from Illinois was cancelled, luckily she ran into Glickman who claimed she was with their party and got her on their flight out but to National instead of BWI -- she had to go get her car at BWI and called at 7:00 or so -- said she would call him and if he checked his messages, maybe he would call her back. He was at the pool at 7:30 -- she didn't know if he had company or what, but he called her later that evening and said that he would talk to XX XXX this week.

radio
June 9 address
my
Dad

Calls to M
at her house
from Betty
Sunday with

M.M., Sep 15 -

845-DC-00000193

Seal of
the
Black
Dog
Melvin
Boyer
Mr. Pres.
1997
with
my
M...

B calls M at office
late afternoon
to tell her
about "stuff"
he brings
her from

took her to
London -
to see Benten
movie
Jug and roses

needs to
be done
soon

Danny M...
Shabari
14...

2:30 16 Sep M calls Betty
to try & arrange a phone call -
& asked whether he had spoken to
Suzanne - Betty said she had already

done that & was now
aware of the situation
0 0 1 ... M.H. - maintain.

**PRESIDENT CLINTON'S RESPONSE
TO PLAINTIFF'S THIRD SET OF
INTERROGATORIES
JONES V. CLINTON
SEALED PURSUANT TO
COURT ORDER**

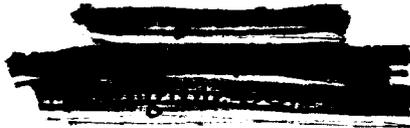
2684

PAULA CORBIN JONES
V.
WILLIAM JEFFERSON CLINTON

WITNESS LIST

2685

Monica S. Lewinsky



11 December 1997

Ms. Ursula Fairbairn
EVP, Human Resources & Quality
American Express Company
American Express Tower
World Financial Center
New York, New York 10285

Dear Ms. Fairbairn:

I am writing at the suggestion of Vernon Jordan, who has spoken with you on my behalf.

I am interested in exploring opportunities in Communications or Public Relations in New York. I am hoping to secure a position which would require effective communication skills, creativity, and frequent interaction with people. My various jobs in Washington, DC have provided me with the training and skills needed to further pursue a career in these areas.

Most recently, I have been working for the Honorable Ken Bacon, the Assistant Secretary of Defense for Public Affairs, as his primary assistant. My responsibilities range from interacting with the media on his behalf, to providing administrative assistance on the Secretary of Defense's international trips, to assembling timely updates of current media stories. My prior experience was at the White House in Legislative Affairs and the Chief of Staff's Office. Please see the enclosed resume for further detail.

I am moving to New York and am seeking employment to begin the first of the year. I am ready and available to speak with whoever in your office you might deem appropriate. I will follow up with a phone call to your office on Monday, December 15th, 1997.

Thank you for time.

Sincerely,

A handwritten signature in cursive script that reads "Monica S. Lewinsky".

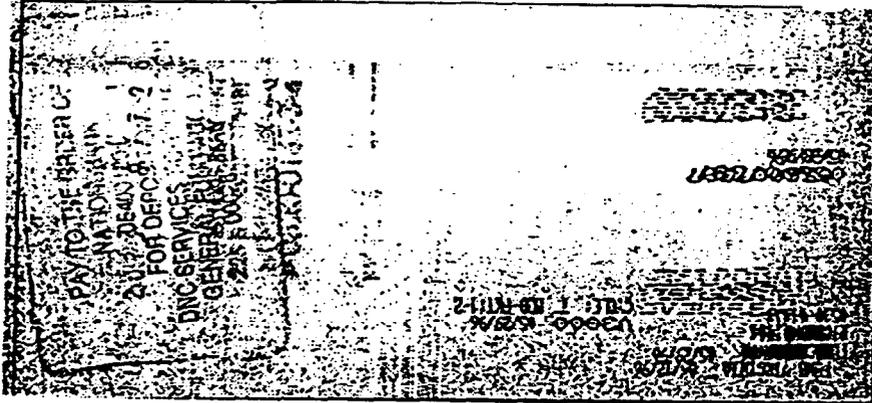
Monica S. Lewinsky

856-DC-00000002

From Ursula Fairbairn's Files

CC: Mr. Vernon Jordan

PAY TO THE ORDER OF **MONICA S. LEWINSKY** 594
 6 May 96
 \$ 250.00
 Two hundred fifty 00/100
 First Union National Bank of Virginia
 M. Lewis



[Redacted]

JOB 08008 OP JNH WS IDW09W NODE4
 CF12982 P 02/03/98 15:09:25
 AA
 LEWIS, 2/17, [Redacted], #0500, 7/96
 WILKES SUBPOENA DESK
 NC 2010

854-DC-00001485

NC 99999

0041/0085

Express Cash Statement

Electronic Fund Transfers Involving
Withdrawals From Checking Account:

Card Number: [REDACTED]

Cash Withdrawal From Financial Institution Account No

11-29-97	Cash Received: Dispenser: OLO1	\$300.00	Fee: \$.00	UBOC BRENTWOOD W/U	Transaction Total: LOS ANGELECAUS	\$300.00
12-04-97	Cash Received: Dispenser: L9BDCC11	\$168.49	Fee: \$.00	LLOYDS BANK, U.K.	LLOY DSGB	\$168.49
12-04-97	Cash Received: Dispenser: L9BCGC11	\$134.79	Fee: \$.00	LLOYDS BANK, U.K.	LLOY DSGB	\$134.79

To change your bank or Personal Identification Number, or to find out the Express Cash location nearest you, call 1-800-CASH-NOW.



/BGN01228

// PG-2138 / ST PG 2 OF 2 /

ITEM 1 HOLIDAY INN, DIEGEM \$403.25

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	97/12/04	913576412	53
Service Establishment and Location			
HOLIDAY INN HOLIDAYSTRAAT 7			
Record of Charge			
HOTEL			
S/E # 9410126783			
TOTAL CHARGE AMOUNT			14724

ITEM 2 GROSVENOR HOUSE HOTEL, PARK LANE, LONDON \$752.26

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	97/12/05	011024005	
Service Establishment and Location			
GROSVENOR HOUSE HOTEL PARK LANE			
Record of Charge			
ACCOMMODATION			
S/E # 9420124570			
TOTAL CHARGE AMOUNT			455.37

ITEM 3 001217 ATM WITHDRAWAL 11/29/97 \$300.00

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	11/29/97	001217	00
Service Establishment and Location			
20022 N			
Record of Charge			
GOVERNMENT/CEC ROC NUMBER OLO1			
S/E # 5026514182			
TOTAL CHARGE AMOUNT			\$300.00

ITEM 4 442204 ATM WITHDRAWAL 12/04/97 \$134.79

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/04/97	442204	00
Service Establishment and Location			
20022 N			
Record of Charge			
GOVERNMENT/CEC ROC NUMBER L9BCGC11			
S/E # 5026514182			
TOTAL CHARGE AMOUNT			\$134.79

ITEM 5 233061 ATM WITHDRAWAL 12/04/97 \$168.49

Cardmember Account No	Date of Charge	Reference Code	Approval Code
[REDACTED]	12/04/97	233061	00
Service Establishment and Location			
20022 N			
Record of Charge			
GOVERNMENT/CEC ROC NUMBER L9BDCC11			
S/E # 5026514182			
TOTAL CHARGE AMOUNT			\$168.49

852-DC-00000045

STATEMENT OF ACCOUNT

0040/0085

8 R4 0 3

YOUR ACCOUNT IS 60 DAYS PAST DUE. PLEASE CONTACT US TO AVOID POSSIBLE SUSPENSION PER OUR FEDERAL CONTRACTUAL AGREEMENT.

Government Account Number

Statement Closing Date

Total Amount Due

[REDACTED]

12-17-97

\$1,842.42

MONICA S LEWINSKY
OSD/WHS

MAIL PAYMENT TO:

AMERICAN EXPRESS
P.O. BOX 42010
PHILADELPHIA PA 19162-4201



8376985563 001842420001775386

Summary of Account

Government Cardholder Name

Government Account Number

Statement Closing Date

MONICA S LEWINSKY

[REDACTED]

12-17-97

Previous Balance

New Charges

Other Debits

Payments Received

Other Credits

Balance Due

\$67.04

\$1,758.79

\$16.59

\$.00

\$.00

\$1,842.42

Reference Number	Item Number	Description of Monthly Activity	Charges	Credits
		PREVIOUS BALANCE	\$67.04	
094338	1	HOLIDAY INN, DIEGEM BELGIUM		
		14,724 BELGIAN FRANCS BILLED AS	403.25	
090342	2	GROSVENOR HOUSE HOTEL, PARK LANE, LONDON UNITED KINGDOM		
		455.37 POUNDS STERLING BILLED AS	752.26	
501334	3	001217 ATM WITHDRAWAL 11/29/97		
		UBOC BRENTWOOD W/U LOS ANGELECAUS	300.00	
501339	4	442204 ATM WITHDRAWAL 12/04/97		
		LLOYDS BANK, U.K. LLOY DSGB	134.79	
501339	5	233061 ATM WITHDRAWAL 12/04/97		
		LLOYDS BANK, U.K. LLOY DSGB	168.49	
823334		ATM CASH ADVANCE FEE		
		DATE OF ABOVE 11/30	8.25	
823339		ATM CASH ADVANCE FEE		
		DATE OF ABOVE 12/05	4.63	
823339		ATM CASH ADVANCE FEE		
		DATE OF ABOVE 12/05	3.71	
		TOTAL CHARGES AND CREDITS	\$1,775.38	
		BALANCE DUE	\$1,842.42	

PAGE 1 OF 2

852-DC-0000044

/RGN01228
/ ST PG 1 OF 2 / 1 02 / Y ZIP 20037
// PG-2135

2690

Statement of Account

0033/0085

8 R4 0 2

YOUR ACCOUNT IS 30 DAYS PAST DUE. PLEASE DISREGARD THIS NOTICE IF EXPENSE REPORTS HAVE BEEN SUBMITTED OR PAYMENT SENT.

Government Account Number

Statement Closing Date

Total Amount Due

[REDACTED]

08-17-97

\$1,895.36

MONICA S LEWINSKY
OSD/WHS
[REDACTED]

MAIL PAYMENT TO:

AMERICAN EXPRESS
P.O. BOX 42010
PHILADELPHIA PA 19162-4201



8376985563 001895360001091630

Summary of Account

Government Cardholder Name

Government Account Number

Statement Closing Date

MONICA S LEWINSKY

[REDACTED]

08-17-97

Previous Balance	New Charges	Other Debits	Payments Received	Other Credits	Balance Due
\$803.73	\$1,083.38	\$8.25	\$.00	\$.00	\$1,895.36

Reference Number	Item Number	Description of Monthly Activity	Charges	Credits
		PREVIOUS BALANCE	\$803.73	
095199	1	DUNA HOTEL MARRIOTT, BUDAPEST HUNGARY		
090200	2	52,120.00 HUNGARIAN FORINT BILLED AS RUS HOTEL, KIEV UKRAINE	278.66	
016209		137.00 U.S. DOLLARS BILLED AS HOTEL SHERATON SOFIA, SOFIA BULGARIA	137.00	
501202	3	367.72 U.S. DOLLARS BILLED AS 000061 ATM WITHDRAWAL 07/20/97	367.72	
823202		UB of CA BRENTWOOD W/U LOS ANGELECAUS ATM CASH ADVANCE FEE	300.00	
		DATE OF ABOVE 07/21	8.25	
		TOTAL CHARGES AND CREDITS	\$1,091.63	
		BALANCE DUE	\$1,895.36	

PAGE 1 OF 2

852-DC-00000037



// PG-2567 / ST PG 1 OF 2 / 1 OZ / N ZIP 200372-0900/8600 1203

Government Cardholder Name
MONICA S LEWINSKY

Government Account Number
 [REDACTED]

Expiry Date
07-17-97

Page 2 of 3

EG001217
 3425

0031/0085

Express Cash Statement

Card Number: [REDACTED]

Electronic Fund Transfers Involving
 Withdrawals From Checking Account

Cash Withdrawal From Financial Institution Account No

07-08-97	Cash Received: Dispenser: 2150	\$67.97	Fee: \$.00	Transaction Total:	\$67.97
				AMEX-PLAZA DE LAS CORTES MADRID TSO ES	
07-08-97	Cash Received: Dispenser: 2150	\$33.99	Fee: \$.00	Transaction Total:	\$33.99
				AMEX-PLAZA DE LAS CORTES MADRID TSO ES	
07-10-97	Cash Received: Dispenser: 2062	\$10.76	Fee: \$.00	Transaction Total:	\$10.76
				AMEX-AMEX- BUDAPEST TSO BUDAPEST TSO HU	
07-10-97	Cash Received: Dispenser: 2062	\$53.82	Fee: \$.00	Transaction Total:	\$53.82
				AMEX-AMEX- BUDAPEST TSO BUDAPEST TSO HU	
07-10-97	Cash Received: Dispenser: 2062	\$107.63	Fee: \$.00	Transaction Total:	\$107.63
				AMEX-AMEX- BUDAPEST TSO BUDAPEST TSO HU	

852-DC-00000035

To change your bank or Personal Identification Number, or to find out the Express Cash location nearest you, call 1-800-CASH-NOW.



ITEM 1 \$402.22
 PALACE HOTEL, MADRID

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	97/07/09	191001816	29
Service Establishment and Location			
PALACE HOTEL PLZ DE LAS CORTES 7			
Record of Charge			
GRACIAS POR UTILIZAR LA TARJETA AMERICAN EXPRESS THANK YOU FOR USING THE AMERICAN EXPRESS CARD			
TOTAL CHARGE AMOUNT			59348

ITEM 2 \$119.80
 JUDIT FOLKLOR, BUDAPEST

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	97/07/10	1607	31
Service Establishment and Location			
JUDIT FOLKLOR VACI U.S.			
Record of Charge			
SHOP CHARGE			
TOTAL CHARGE AMOUNT			22000.00

ITEM 3 \$33.99
 031820 ATM WITHDRAWAL 07/08/97

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	07/08/97	031820	00
Service Establishment and Location			
20022 N			
Record of Charge			
GOVERNMENT/CEC ROC NUMBER 2150			
S/E # 5026514182			TOTAL CHARGE AMOUNT
			\$33.99

ITEM 4 \$67.97
 031806 ATM WITHDRAWAL 07/08/97

Cardmember Account No.	Date of Charge	Reference Code	Approval Code
[REDACTED]	07/08/97	031806	00
Service Establishment and Location			
20022 N			
Record of Charge			
GOVERNMENT/CEC ROC NUMBER 2150			
S/E # 5026514182			TOTAL CHARGE AMOUNT
			\$67.97

THE WHITE HOUSE

Linda Tripp 703/
 [REDACTED]

Dudge Rept

What I was told

No lawyer speaks
 to me because
 I was told she is
 I know she is

lying

- harassment -
 blatantly untrue
 - make no bones
 about what he
 did

880-DC-00000002


 HB 004746

at second office -
volunteering

Claimed to be a
close friend of BC

Greggins, no
wonder

volunteer - 3 times
a week - heated

• Air Stock - a bit

- asked if we could
use a vol.

- we brought her over

880-DC-00000003


HB 004747

3

THE WHITE HOUSE

Shortly before Bernie

Turned over —
in her attempt

on going plastic —
Richard defect
Chickie soup

Rehearsed speeches

Notes —

Everything was over
w/ one attempt

—
The day this speech
occurred — ~~speech~~ ^{Chickie}
was next — this is
what he did to

880-DC-00000004



HB 004748

" They were doing
 * in study area

Don't believe that
she is stable

No words of
 sexual harassment
 →

She claims now it
 is harassment

~~Prior to her husband~~
 shooting himself -
days prior

She was in pursuit
 3 times a week

880-DC-00000005



HB 004749

THE WHITE HOUSE

I think Isakoff
leaked it -

Calaramitto -

Her lawyer -

Called Robert Wieg -

She chose to bring
this out - now
she is in sure -

Not only will I
not confirm

880-DC-00000006



HB 004750

You were a happy
 ecstatic, joyful

Aggressively pushed
 ← →

Marriage shaky -
 asking for a divorce
 →

Told her husband
 supposedly - he was
 going to leave -

I don't know what
 happened - his mother

preferred -
 couldn't call - for

BC -

880-DC-00000007



HB 004751

THE WHITE HOUSE

Tom Swine -

Talking about his
name in August

Great ~~memorandum~~
about - -

Great distribution of
the fact -

mainly ~~quibbling~~
I would be fine
~

880-DC-00000008


HB 004752

DAVID PYKE, ESQ.
Rader, Campbell, Fisher & Pyke
Counsel for Plaintiff
Stemmons Place, Suite 1080
2777 Stemmons Freeway
Dallas, Texas 75207

and

ROBERT S. BENNETT, ESQ.
KATHERINE S. SEXTON, ESQ.
Skadden, Arps, Slate, Meager & Flom LLP
Counsel for Defendant Clinton
1440 New York Avenue, N.W.
Eleventh Floor
Washington, D.C. 20005-2111

and

BILL W. BRISTOW, ESQ.
Counsel for Defendant Ferguson
216 E. Washington
Jonesboro, Arkansas 72401

902-DC-00000003

	<u>Hours</u>	
<u>Drafting Matter</u>		
01/12/98	Draft letter to Atty David Pyke.	0.50
01/15/98	Draft memo to file re: courier issue.	0.30
	Draft Motion to Quash and for Protective Order.	5.90
01/20/98	Draft letter to Atty Speights.	0.40
	Draft letter to Atty Speights.	0.30
		<u>Amount</u>
	SUBTOTAL:	[7.40 1,850.00]
<u>Research</u>		
01/15/98	Research: discovery limits.	3.50
		<u>Amount</u>
	SUBTOTAL:	[3.50 875.00]
<u>Telephone conf.</u>		
01/07/98	Telephone conference with Atty Jordan.	0.20
01/12/98	Telephone message to Atty David Pyke.	0.10
	Telephone conference with Client.	0.20
	Telephone conference with Atty David Pyke.	0.20
	Telephone conference with Client.	0.20
01/14/98	Telephone conference with Client.	0.20
01/15/98	Telephone conference with Client.	0.20

FedEx USA Airbill

Tracking Number **8009077576**

Form 1's Copy

197 500 51010052 5303N

1 From (please print)

Date **1-16-98** Sender's FedEx Account Number **[REDACTED]**

Sender's Name **Francis D. Carter, Esq.** Phone **[REDACTED]**

Company **CARTER & YARRONE** Dept./Floor Suite/Room

Address **1341 G ST NW STE 510**

City **WASHINGTON** State **DC** Zip **20005**

2 Your Internal Billing Reference Information (Make sure it fits in the space and appears on the label)

3 To (please print)

Recipient's Name **Bill W. Bristow, Esq.** Phone **[REDACTED]**

Company Dept./Floor Suite/Room

Address **216 E. Washington**

City **Jonesboro** State **AR** Zip **72401**

For "HOLD" Service check here Weekday Saturday

For Saturday Delivery check here Yes Charge Has no effect on all air services No

Service Conditions, Restricted Dates, and Limit of Liability - By using this Airbill, you agree to the service conditions in our current Service Guide or U.S. Government Service Guide. Both are available on request. See back of Service Guide for a complete and additional terms. You will not be responsible for any damage to contents of packages unless the result of loss, damage, or delay, including any conditions or restrictions, unless you declare in writing that the actual charges and document you attach to the shipping label. This Airbill is not valid for use for any other purpose.

Questions? Call 1-800-Go-FedEx **902-DC-0000033**

The World On Time

4 Service*

FedEx Priority Overnight FedEx Standard Overnight FedEx 2Day
 FedEx Next Business Day FedEx Overnight Freight FedEx 2Day Freight
 FedEx Home Overnight

5 Packaging

FedEx Envelope FedEx Pak FedEx Box FedEx Tube Other Packaging

6 Special Handling

Does this shipment contain dangerous goods? Yes No
 Dry Ice Fragile Cargo Aircraft Only

7 Payment

Sender Recipient Third Party Credit Card Cash/Check

Total Packages Total Weight Total Declared Value Total Charges

Total Packages: Total Weight: Total Declared Value: Total Charges: \$0.00

*When declaring value, please use the actual value of the contents, not the declared value. For international shipments, the maximum declared value is \$5000 per package. For U.S. domestic shipments, the maximum declared value is \$100 per package. For U.S. international shipments, the maximum declared value is \$5000 per package. For U.S. international shipments, the maximum declared value is \$5000 per package.

8 Release Signature

The recipient's signature is required for all packages. For U.S. domestic shipments, the recipient's signature is required for all packages. For U.S. international shipments, the recipient's signature is required for all packages.

232

Net. G.W. 100% PAID BY AIRMAIL
FORM 1'S COPY - PRINTED IN U.S.A.

2701

2702

CARTER & VARRONE

Attorneys-at-Law
Suite 510, The Colorado Building
1341 G Street, NW
Washington, DC 20005

(202) 393-4330
Facsimile (202) 393-5657

Francis D. Carter
Edward G. Varrone*
* also admitted in Maryland

Stephanie Y. Bradley *
of counsel
* also admitted in MD and NY

Invoice submitted to:

MS. MONICA S. LEWINSKY
700 New Hampshire Avenue, N.W.
Apartment 114
Washington DC 20037

January 7, 1998

In Reference To: Jones v. Clinton and Ferguson
Invoice # 10951

Professional services

	<u>Hours</u>	
<u>Conference</u>		
12/22/97 Meeting with Client (Office),	1.10	
12/23/97 Meeting with Attys Bob Bennett and Kathy Sexton (their Office).	1.00	
01/05/98 Meeting with Client (Office).	1.10	
		<u>Amount</u>
SUBTOTAL:	[3.20	800.00]
<u>Document Review</u>		
01/05/98 Review material from Atty Kathy Sexton.	0.20	
01/06/98 Review material from Atty Sexton at Skadden, Arps.	0.40	
SUBTOTAL:	[0.60	150.00]

902-DC-00000037

MS. MONICA S. LEWINSKY

	<u>Hours</u>	
<u>Drafting Matter</u>		
12/24/97	Draft Engagement Agreement.	0.50
	Draft letter to Client.	0.20
01/06/98	Draft Affidavit for Client.	0.60
		<u>Amount</u>
	SUBTOTAL:	[1.30 325.00]
<u>Telephone conf.</u>		
12/22/97	Telephone message to Atty Bob Bennett.	0.10
	Telephone conference with Atty Kathy Sexton.	0.20
12/23/97	Telephone conference with Atty Kathy Sexton.	0.10
	Telephone conference with Client.	0.10
	Telephone conference with Client.	0.20
12/29/97	Telephone conference with Client.	0.10
12/30/97	Telephone conference with Atty Kathy Sexton, Skadden, Arps firm.	0.10
	Telephone conference with Client.	0.10
01/06/98	Telephone conference with Atty Katy Sexton, Skadden, Arps.	0.30
	Telephone message to Atty David Pyke.	0.10
	Telephone conference with Client.	0.10

Issued by the
UNITED STATES DISTRICT COURT
 DISTRICT OF COLUMBIA

PAULA JONES,*Plaintiff,*

V.

SUBPOENA IN A CIVIL CASECASE NUMBER:¹

LR-C-94-290

WILLIAM JEFFERSON CLINTON

and

DANNY FERGUSON,*Defendants.***COPY**TO: **MONICA LEWINSKY**


YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION The Rutherford Institute 733 15th Street NW., Suite 410 Washington, DC 20005	DATE AND TIME Friday, January 23, 1998 9:30 a.m.
---	--

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

Exhibit A, attached hereto.

PLACE The Rutherford Institute 733 15th Street NW., Suite 410 Washington, DC 20005	DATE AND TIME Friday, January 23, 1998 9:30 a.m.
---	--

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
----------	---------------

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person designated, the matters on which the person will testify, Federal Rules of Civil Procedure, 30(b) (6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)  , ATTORNEY FOR PLAINTIFF	DATE December 17, 1997
--	---------------------------

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
 Donovan Campbell, Jr., Rader, Campbell, Fisher & Pyke, Stemmons Place, Suite 1080,
 2777 Stemmons Freeway, Dallas, Texas 75207, (214) 630-4700

902-DC-00000135

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

EXHIBIT A**DOCUMENTS AND THINGS TO BE PRODUCED**

Pursuant to the Federal Rules of Civil Procedure, the Deponent is directed to produce, at the time and place of the Deponent's deposition, all of the documents and tangible things described in the enumerated requests below. In responding to the following requests for production, the Deponent is directed to comply with the following instructions and to apply the following definitions.

DEFINITIONS

For the purposes of these requests, the following definitions apply:

"Defendant Clinton" means William Jefferson Clinton.

"Defendant Ferguson" means Danny Ferguson.

"Document" means any tangible thing on which appears, or in which is stored or contained, any words, numbers, symbols, or images. The term "document" includes any and all writings, drawings, graphs, charts, photographs, tape recordings, video recordings, phonorecords, and other data compilations from which information can be obtained and translated, if necessary, through detection devices, into reasonably usable form.

"Person" means any identifiable entity, including but not limited to individuals, corporations, partnerships, sole proprietorships, and unincorporated associations.

"You" means the Deponent.

INSTRUCTIONS

A request for any particular document or thing is a request for the original, for each and every photocopy or duplicate of that document or thing, and for each and every draft of the document or thing. If, however, you produce the original of the document or thing, you are not required to produce any photocopies or duplicates unless they are not identical (as, for example, when marginal notations are made on a copy).

The documents and things to be produced should, at the time of production, be organized and labeled to correspond to the enumerated requests below. In the alternative, they may be produced as they are kept in the ordinary course of business, if it is possible to do so.

902-DC-00000136

DEC -19 97 (FRI) 14:15 RADER CAMPBELL

TEL: 214 630 9996

You are to produce not only the documents and things in your immediate possession, but also those over which you have custody or control, including but not limited to documents and things in the possession, custody, or control of your agent(s), your accountant(s), your attorney(s), any investigator employed by you or by your attorney(s), or any consultant or expert witness employed by you or by your attorney(s).

If, in response to a particular request, an objection is interposed, and the objection applies to some but not all of the documents requested, please produce all responsive documents and things to which the objection does not apply.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Every document relating to any private meetings between you and Defendant Clinton, including any agendas, letters, journals, diaries, notes, tape recordings or memoranda.

REQUEST FOR PRODUCTION NO. 2: Every document constituting or containing communications between you and Defendant Clinton, including letters, cards, notes, memoranda, and all telephone records, notes or memoranda reflecting calls to or from any telephone in the White House, the Pentagon, any governmental office or property, or your home or office, any cellular or mobile telephone, or to or from any other telephone numbers of Bill Clinton or you or anyone acting for or on behalf of him or you.

REQUEST FOR PRODUCTION NO. 3: Every document concerning any communications with persons other than Defendant Clinton which reference any relationship or any private meetings between you and Defendant Clinton.

REQUEST FOR PRODUCTION NO. 4: Every document concerning any communications with persons other than Defendant Clinton which reference any relationship or any private meetings between you and Defendant Clinton.

REQUEST FOR PRODUCTION NO. 5: Every calendar or address book or other document reflecting any meetings between you and Defendant Clinton or reflecting the address or telephone number of Defendant Clinton at any location.

REQUEST FOR PRODUCTION NO. 6: Every document relating to any communications with anyone concerning any occurrence involving you and Defendant Clinton, including any agendas, letters, journals, diaries, notes, time records, employment records, tape recordings or memoranda.

902-DC-00000137

EXHIBIT A - DOCUMENTS AND THINGS TO BE PRODUCED

DEC. -19 97 (FRI) 14:16 RADER, CAMPBELL

TEL: 214 630 9990

REQUEST FOR PRODUCTION NO. 7: Please produce each and every gift including, but not limited to, any and all dresses, accessories, and jewelry, and/or hat pins given to you by, or on behalf of, Defendant Clinton.

REQUEST FOR PRODUCTION NO. 8: Please produce each and every document mentioning or describing any gift given to you by Defendant Clinton.

902-DC-00000138

EXHIBIT A - DOCUMENTS AND THINGS TO BE PRODUCED

Dec. 22 MONDAY

11:00 Vernon Janday, Sr. off

52 / 156 - 9

Dec. 23 TUESDAY

11:00 Bob Bennett, his off

357 - 8

Dec. 24 WEDNESDAY Chanukah

158 - 7

Christmas Day

THURSDAY Dec. 25

159 - 6

Boxing Day CANADA FRIDAY Dec. 26

160 - 5

SATURDAY Dec. 27

161 - 4

SUNDAY Dec. 28

162 - 1

Jan. 5 MONDAY

3:00 Maria Lewis, etc
177.

2/5 - 140

Jan. 6 TUESDAY

20:

42

6 - 159

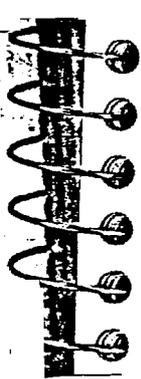
Jan. 7 WEDNESDAY

10: Maria Lewis, etc
177.

2: Phoebe M. Hanson, etc
177.

7 - 158

2710



Standard Line™
AGNER REORDER NO. 504

P H O N E	TO	F	DATE	11/6	TIME	10:41	AM PM
	FROM	William Jordan	AREA CODE				
	OF		NO.				
M E S S A G E	Calling you from the train						
	station in NY. Will call back						
	this afternoon when I get to						
	D.C.						
							SIGNED

902-DC-0000251

2711

PARK HYATT - WASHINGTON, D.C.
MELROSE
101 LISA
8/1 1501 GST 2
JAN07'98 8:19AM

1 FRUIT PLATE	2.50
1 FRUIT YOGURT	3.25
1 CEREAL W/FRUIT	5.50
1 ENGLISH MUFFIN	1.00
1 COFFEE	2.50
1 O. JUICE	3.75
1 HOT CHOCOLATE	3.00
FOOD SALES	30.50
SERVICE CHARGES	6.00
TAX	3.05
TOTAL PAID	39.55
\$ CHARGE TIP	6.00
	07/99
VE JORDAN	
AMERICAN EXPRESS	39.55
704 CLOSED JAN07 9:11AM	

PARK HYATT - WASHINGTON, D.C.
MELROSE
CHECK: 1501
TABLE: 8/1
SERVER: 101 LISA
DATE: JAN07'98 8:57AM
CARD TYPE: AMERICAN EXPRESS
ACCT #:
EXP DATE: 07/99
AUTH CODE: 950042
VE JORDAN

SUBTOTAL: 33.55

TIP: 6-
TOTAL: 39.55

CUSTOMER SIGNATURE
I HEREBY PAY ABOVE TOTAL
AMOUNT ACCORDING TO CARD ISSUES
AGREEMENT
* YELLOW IS CUSTOMER COPY *

916-DC-00000003

Issued by the
UNITED STATES DISTRICT COURT
 DISTRICT OF **COLUMBIA**

PAULA JONES,

Plaintiff,

v.

WILLIAM JEFFERSON CLINTON

and

DANNY FERGUSON,

Defendants.

SUBPOENA IN A CIVIL CASE

CASE NUMBER:¹

LR-C-94-290

920-DC-00000013

TO: **MONICA LEWINSKY**

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY

COURTROOM

DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION

The Rutherford Institute
 733 15th Street NW., Suite 410
 Washington, DC 20005

DATE AND TIME

Friday, January 23, 1998
 9:30 a.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

Exhibit A, attached hereto.

PLACE

The Rutherford Institute
 733 15th Street NW., Suite 410
 Washington, DC 20005

DATE AND TIME

Friday, January 23, 1998
 9:30 a.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person designated, the matters on which the person will testify, Federal Rules of Civil Procedure, 30(b) (6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)

DATE

Donovan Campbell Jr., ATTORNEY FOR PLAINTIFF

December 17, 1997

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

Donovan Campbell, Jr., Rader, Campbell, Fisher & Pyke, Stemmons Place, Suite 1080,
 2777 Stemmons Freeway, Dallas, Texas 75207, (214) 630-4700

(See Rule 45, Federal Rules of Civil Procedure, Parts C & D on Reverse)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

Date	Place
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
Date

Signature of Server

Address of Server

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fees.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

PROOF OF SERVICE

Date Place

SERVED

12-19-97 AT 4:00 P.M.

THE PENTAGON, ARLINGTON, VA

SERVED ON (PRINT NAME)

MANNER OF SERVICE

MONICA LEWINSKY

PERSONALLY

SERVED BY (PRINT NAME)

TITLE

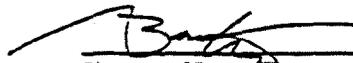
BRIAN HARTE

PRIVATE PROCESS SERVER

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on 12-22-97
Date


Signature of Server

CAPITOL PROCESS SERVICES
1827 18TH STREET, N.W.
Address of Server WASHINGTON, D.C. 20009
(202) 667-0050

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fees.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;
(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

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(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

EXHIBIT A**DOCUMENTS AND THINGS TO BE PRODUCED**

Pursuant to the Federal Rules of Civil Procedure, the Deponent is directed to produce, at the time and place of the Deponent's deposition, all of the documents and tangible things described in the enumerated requests below. In responding to the following requests for production, the Deponent is directed to comply with the following instructions and to apply the following definitions.

DEFINITIONS

For the purposes of these requests, the following definitions apply:

"Defendant Clinton" means William Jefferson Clinton.

"Defendant Ferguson" means Danny Ferguson.

"Document" means any tangible thing on which appears, or in which is stored or contained, any words, numbers, symbols, or images. The term "document" includes any and all writings, drawings, graphs, charts, photographs, tape recordings, video recordings, phono records, and other data compilations from which information can be obtained and translated, if necessary, through detection devices, into reasonably usable form.

"Person" means any identifiable entity, including but not limited to individuals, corporations, partnerships, sole proprietorships, and unincorporated associations.

"You" means the Deponent.

920-DC-00000016

INSTRUCTIONS

A request for any particular document or thing is a request for the original, for each and every photocopy or duplicate of that document or thing, and for each and every draft of the document or thing. If, however, you produce the original of the document or thing, you are not required to produce any photocopies or duplicates unless they are not identical (as, for example, when marginal notations are made on a copy).

The documents and things to be produced should, at the time of production, be organized and labeled to correspond to the enumerated requests below. In the alternative, they may be produced as they are kept in the ordinary course of business, if it is possible to do so.

You are to produce not only the documents and things in your immediate possession, but also those over which you have custody or control, including but not limited to documents and things in the possession, custody, or control of your agent(s), your accountant(s), your attorney(s), any investigator employed by you or by your attorney(s), or any consultant or expert witness employed by you or by your attorney(s).

If, in response to a particular request, an objection is interposed, and the objection applies to some but not all of the documents requested, please produce all responsive documents and things to which the objection does not apply.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Every document relating to any private meetings between you and Defendant Clinton, including any agendas, letters, journals, diaries, notes, tape recordings or memoranda.

REQUEST FOR PRODUCTION NO. 2: Every document constituting or containing communications between you and Defendant Clinton, including letters, cards, notes memoranda, and all telephone records, notes or memoranda reflecting calls to or from any telephone in the White House, the Pentagon, any governmental office or property, or your home or office, any cellular or mobile telephone, or to or from any other telephone numbers of Bill Clinton or you or anyone acting for or on behalf of him or you.

REQUEST FOR PRODUCTION NO. 3: Every document concerning any communications with persons other than Defendant Clinton which reference any relationship or any private meetings between you and Defendant Clinton.

REQUEST FOR PRODUCTION NO. 4: Every document concerning any communications with persons other than Defendant Clinton which reference any relationship or any private meetings between you and Defendant Clinton.

REQUEST FOR PRODUCTION NO. 5: Every calendar or address book or other document reflecting any meetings between you and Defendant Clinton or reflecting the address or telephone number of Defendant Clinton at any location.

REQUEST FOR PRODUCTION NO. 6: Every document relating to any communications with anyone concerning any occurrence involving you and Defendant Clinton, including any agendas, letters, journals, diaries, notes, time records, employment records, tape recordings or memoranda.

920-DC-00000017

REQUEST FOR PRODUCTION NO. 7: Please produce each and every gift including, but not limited to, any and all dresses, accessories, and jewelry, and/or hat pins given to you by, or on behalf of, Defendant Clinton.

REQUEST FOR PRODUCTION NO. 8: Please produce each and every document mentioning or describing any gift given to you by Defendant Clinton.

920-DC-00000018

PAULA CORBIN JONES
V.
WILLIAM JEFFERSON CLINTON

SEALED DOCUMENTS

2719

NationsBank, N.A.
 Regional Center, VA2-125-04-01
 P.O. Box 27025
 Richmond, VA 23261-7025

Page 2 of 4
 Statement Period
 07-04-97 through 08-05-97
 Number of checks enclosed 12
 B 03 0 C 03 67963

Account Number: [REDACTED]

MONICA S LEWINSKY

Regular Checking Additions and Subtractions

Date Posted	Amount(\$)	Resulting Balance(\$)	Transaction
07-07	1.50-	193.22	Eds/7-11 07/04 #000004841 Withdrwl 1500 S. Fern St. Arlington, VA Fee
07-07	1.50-	191.72	Chevy Chase Fe 07/06 #000117101 Withdrwl Safeway #928 Washington DC Fee
07-07	1.50-	190.22	Chevy Chase Fe 07/06 #000425641 Withdrwl Georgetown Park M Washington DC DC Fee
07-09	13.25-	176.97	Check 316
07-11	966.25+	1,143.22	Dao Cl Des= fed Salary ID= [REDACTED] Eff Date: 970711
07-16	200.00-	943.22	NationsBank ATM 07/16 #000001861 Withdrwl Pentagon N. Conc Washington VA
07-18	101.50-	841.72	B Of A 07/17 #000056215 Withdrwl Century City Mrkt Los Angeles CA
07-18	50.00-	791.72	Check 319
07-18	1.50-	790.22	B Of A 07/17 #000056215 Withdrwl Century City Mrkt Los Angeles CA Fee
07-21	201.50-	588.72	B Of A 07/19 #000124805 Withdrwl Beverly Hills Mai Beverly Hills CA
07-21	160.00-	428.72	Ub of CA 07/20 #000000042 Withdrwl Brentwood W/U Los Angeles CA
07-21	100.00-	328.72	Cnb 07/19 #000426083 Withdrwl 9229 Sunset Blvd. Los Angeles, CA
07-21	70.31-	258.41	White Dove 07/18 #000742817 Purchase White Dove Santa Monica CA
07-21	77.30-	181.11	Check 320
07-21	1.50-	179.61	B Of A 07/19 #000124805 Withdrwl Beverly Hills Mai Beverly Hills CA Fee
07-21	1.50-	178.11	Cnb 07/19 #000426083 Withdrwl 9229 Sunset Blvd. Los Angeles, CA Fee
07-21	1.50-	176.61	Ub of CA 07/20 #000000042 Withdrwl Brentwood W/U Los Angeles CA Fee
07-22	4.60-	172.01	Check 321
07-22	0.00	172.01	Fee For Electronic Account Inquiry
07-23	60.00+	232.01	NationsBank ATM 07/23 #000003950 Fr Sav Pentagon N. Conc Washington VA
07-23	80.00-	152.01	Check 323
07-24	100.49-	51.52	Check 351
07-25	1,290.53+	1,342.05	Dao Cl Des= fed Salary ID= [REDACTED] Eff Date: 970725
07-25	30.00-	1,312.05	Citibank 90406 07/24 #000185914 Withdrwl 1000 Conn Av NW Washngtn DC
07-25	1.50-	1,310.55	Citibank 90406 07/24 #000185914 Withdrwl 1000 Conn Av NW Washngtn DC Fee
07-28	0.00	1,310.55	Fee For Electronic Account Inquiry
07-28	160.00-	1,150.55	NationsBank ATM 07/28 #000007065 Withdrwl Pentagon N. Conc Washington VA

2721

ACTIVITY REPORT
OCTOBER 11, 1997
SATURDAY

WHEN THIS SHIFT RELIEVED THE SHIFT, THE PRESIDENT
WAS ON THE SECOND FLOOR RESIDENCE.

PROTECTEE MOVEMENTS:

0952 HRS POTUS MOVED TO THE OVAL OFFICE.
1028 HRS POTUS MOVED TO THE OVAL STUDY.

WHEN THIS SHIFT WAS RELIEVED BY THE SHIFT, THE
PRESIDENT WAS IN THE OVAL OFFICE.

952-DC-0000060

2722

RECORD TYPE: PRESIDENTIAL (NOTES MAIL)

CREATOR: Betty W. Currie (CN=Betty W. Currie/OU=WHO/O=EOP [WHO])

CREATION DATE/TIME: 6-DEC-1997 12:05:03.00

SUBJECT: :

TO: BRUCE R. (Pager) #LINDSEY (BRUCE R. (Pager) #LINDSEY [UNKNOWN])
READ: UNKNOWN

TEXT:

Call Betty ASAP [REDACTED]

964-DC-00000862



0 002118

~~11:10 am~~ 12:57
~~11:15 am~~ 12:59

MEETING
OVAL OFFICE
Staff Contact: ~~Stephanie Street~~ Anne Hawley

11:15 am ✓
~~11:30 am~~ 11:32

BRIEFING
OVAL OFFICE
Staff Contact: Sandy Berger

12:46
12:50

~~11:30 am~~ 11:35
~~12:30 pm~~ 12:45

MEETING
CABINET ROOM
Staff Contact: Sandy Berger, Rahm Emanuel

12:53
12:56 → STEW
BILL

12:30 pm-
6:00 pm

PHONE/OFFICE TIME
OVAL OFFICE

6:00 pm-
6:15 pm

BRIEFING
OVAL OFFICE
Staff Contact: Don Baer, Michael Waldman

6:15 pm-
6:45 pm

TAPE RADIO ADDRESS
ROOSEVELT ROOM
Staff Contact: Megan Moloney

1:23
1:54
WH
STAFF MESS
CREET FRIENDS OF

BC AND HRC RON

THE WHITE HOUSE

1:56 → OVAL

REDACTED

PHOTO

968-DC-00000073



2724

WASHINGTON, D.C.
THURSDAY, NOVEMBER 13, 1997

5:10 pm- CONGRESSIONAL RECEPTION
6:00 pm STATE DINING ROOM
Staff Contact: John Hilley
Event Coordinator: Setti Warren
CLOSED PRESS

Note: Call time for Congressional Members for 5:00 pm.

-- The President will meet and greet informally with 40 Congressional Members.

6:30 pm- BRIEFING
6:45 pm RESIDENCE
Staff Contact: Sandy Berger

6:45 pm- PRIVATE DINNER WITH PRESIDENT ZEDILLO OF MEXICO
8:35 pm RESIDENCE
Staff Contact: Sandy Berger
Event Coordinator: Setti Warren
OFFICIAL PHOTOGRAPH ONLY

REDACTED

968-DC-00000187

8:50 pm THE PRESIDENT departs The White House via motorcade en route
Private Residence
[drive time: 25 minutes]

9:15 pm THE PRESIDENT arrives Private Residence

November 13, 1997 08:57 pm


0 003547

Saturday, March 29, 1997

Daynotes...

- The President talked, today, with:

5:38 p.m.
, 9:17 p.m.
, 9:01 p.m.
, 8:32 p.m., 8:58 p.m., 9:15 p.m.
, 10:44 p.m.
11:12 a.m.
11:23 a.m.
11:51 a.m.
4:14 p.m.

968-DC-00000236

REDACTED

0 003596

2726

The President, left out
of the Oval office door for the helicopter at 2:20 p.m. and

- The President arrived at Fort McHenry in Baltimore at 2:50 p.m.

REDACTED

The President arrived at the hotel at 3:10 p.m.

968-DC-00000263

- At 4 p.m., the President made Remarks on the Budget Accord:

1 00 000000 00 0000 0000 0000 0000 0000 0000
0 003623

He returned to the residence at at 7 p.m., joined by Sandy and Mack, for a Private Dinner with Mexico President Zedillo. The President greeted President Zedillo at the South Portico and escorted him to the second floor for the dinner. Markie Bowles visited for five minutes, then departed.

The President joined Zedillo in the diplomatic room for his departure, at 8:45 p.m.

The President departed the White House at 9:10 p.m. for a Private Birthday party for King Hussein and Queen Noor. The President returned to the residence at 1:25 a.m.

Daynotes...

The President talked, via phone, with:

-- Conference Call

9:38 a.m.

11:10 a.m.
 , 12:02 a.m.
 , 12:30 a.m.
 , 11:32 a.m.
 , 4:44 p.m.
 4:50 p.m.
 4:52 p.m.
 , 4:59 p.m.
 , 2:57 p.m.
 3:43 p.m.

REDACTED

6:30 p.m.

PRESS SCHEDULE OF THE PRESIDENT
FRIDAY, APRIL 5, 1996
PAGE 2

8:50 am THE PRESIDENT plants a tree in memory of Secretary of Commerce,
Ronald H. Brown
The South Lawn
INHOUSE POOL COVERAGE ONLY

Press Note: At the conclusion of the planting, the Inhouse
Pool will be escorted to the Marine One departure
area

9:20 am THE PRESIDENT departs the White House via Marine One en route
Andrews AFB, MD
The South Lawn
OPEN PRESS

Press Note: Press Set-Up Scenario for South Lawn
8:45 - 9:10 am - Cabling, Mults & Pre-Set
9:10 - 9:15 am - Escorts to South Lawn
9:15 am - FINAL Access to Departure

9:30 am THE PRESIDENT arrives Andrews AFB, MD and boards Air Force One
OPEN PRESS

9:45 am THE PRESIDENT departs Andrews AFB, MD via Air Force One en route
Oklahoma City, Oklahoma
AF-1 Travel Pool accompanies on board

FOR INFORMATION REGARDING THE PRESIDENT'S SCHEDULE WHILE IN
OKLAHOMA, PLEASE REFER TO THE WHITE HOUSE TRAVELING PRESS
SCHEDULE, AVAILABLE IN THE WHITE HOUSE PRESS OFFICE

6:20 pm C THE PRESIDENT departs Oklahoma City, Oklahoma en route Andrews
AFB, MD
AF-1 Travel Pool accompanies on board

968-DC-00000841

-MORE-



**PRESS SCHEDULE OF THE PRESIDENT
SUNDAY, AUGUST 17, 1997**

**EDITOR'S ADVISORY: FOR NEWS PLANNING ONLY
NOT FOR PUBLICATION OR RELEASE**

Intown Travel Pool

Wires: AP, Reuter, UPI
Wire Photo: AFP, AP, Reuter, UPI
TV Corr & Crew: NBC
Lights: NBC
Mag Photo: USN&WR
Radio: ABC Radio
Print: USA Today

Inhouse Pool

All of the Intown pool plus:
Net Cuts: NBC
Mults: NBC
Independent Pool: Reuters

8:00 am Intown Travel Pool gathers, WH Briefing Room,
for protective purposes

PRESS PLANE DEPARTURE SCENARIO TO MARTHA'S VINEYARD, MASS

10:00-11:00 am - Gear and Baggage Call
10:30-11:30 am - Passenger Check-In for press charter
11:45 am - Passenger Check-In Ends
12:15 pm - Press Charter Departs to Martha's Vineyard, MASS

12:15 pm AF-1 Travel Pool Check-In, Andrews AFB,
Maryland, Operations Terminal

AF-1 Travel Pool

Wires: AP, Reuter, UPI
Wire Photo: AP, Reuter, AFP
TV Corr & Crew: NBC
Mag Corr: Newsweek
Mag Photo: USN&WR
Radio: CBS Radio
Print: Boston Globe

968-DC-00002947



Press Schedule

TRIP OF THE PRESIDENT
to
Denver, Colorado; Seattle, Washington;
and Vancouver, British Columbia, Canada
Saturday, November 22 - Tuesday, November 25

NOT FOR RELEASE OR PUBLICATION - For news planning only

Weather/Denver: Mostly cloudy; no rain. High 49, low 24

Weather/Seattle: Rain. High 51, low 43.

Weather/Vancouver: Saturday: Showers, high 51, low 50.

Sunday: Rain likely, high 54, low 35.

Monday: Partly cloudy, high 43, low 31.

REMINDER: Your check-in on Saturday is for an international departure. Please be on time with yourselves, your bags and gear. Remember you MUST have your valid passport with you for this check-in.

968-DC-00003300

VANCOUVER NOTES:

The International Press Center and Television workspace is located in the Vancouver Trade and Convention Center (VTCC), located directly across the street from the Waterfront Center Hotel (there is also an underground connector). The only time when access will be difficult will be between 2 and 5 pm on Monday, when the leaders are holding their meetings there. Please plan accordingly.

Due to security needs, the Waterfront Center Hotel rooms have been reserved for four nights (even though we are only spending three). Therefore, you will be charged for Tuesday, so there is no need to check-out early.

For those in APEC Pools, expect to be standing outside for extended periods (even if your pool is indoors)—so, be prepared with a coat and umbrella.


 S 015832

Trip to Denver, Seattle and Vancouver -- November 22-25, 1997

Saturday - November 22

Press Charter, Andrews AFB to Denver, CO

*All these are at the Andrews Air Force Base in the
the Operations Terminal:*

6:00 am EST	Baggage call, gear call and passenger check-in begin, Andrews AFB
6:30 am EST	Gear call ends.
7:15 am EST	Baggage call ends. *** CHECK-IN CONTINUES ONLY FOR PASSENGERS WHO HAVE ALREADY CHECKED THEIR BAGS.
7:45 am EST	Passenger check-in ends.
8:30 am EST	Press charter departs Andrews AFB en route Denver, CO [Flying time: 3 hrs 40 mins] [Time change: MINUS 2 to MST]
8:30 am EST	AF ONE Pool #1 check-in, Andrews AFB

FILING FACILITIES AND HOTELS

Saturday, mid-day in Denver

Press Advance: Mark Bernstein, George Fitzgerald

MAIN FILE - Denver:

*Geography: The events at the Phipps Conference Center
and the file are located in the residential neighborhood
of southeast Denver called "Belcaro". The file
is in the Denver public school (Knight) at the corner
of the block where the Phipps Center is.*

968-DC-00003301

*WH Press Office. Filing Center and TV Pool all in:
Knight Fundamental Academy
3245 East Exposition, Denver, CO 80209*

NOT FOR RELEASE OR PUBLICATION - For news planning only Page 2



S 015833

February 1996

HILLARY RODHAM CLINTON

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1 Chirac State Visit National Prayer Breakfast	2 Groundhog Day Jr. League RON Des Moines, IA	3 Ames, Iowa Cedar Falls, Iowa
4 NQA Dinner	5 Beyond Beijing Breakfast Governor's Spouses Lunch McLean, VA National School Boards	6 Interviews	7 Denver, CO RON-Los Angeles, CA	8 RON San Francisco San Francisco, CA (Book) Los Angeles, CA (Book)	9 Dallas, TX (Book) Interviews	10
11	12 Iowa Caucus Lincoln's Birthday	13	14 Valentine's Day	15 Book Party (DC) Videos	16	17
18	19 President's Day	20 Interviews Lunch w/ Ambassador Ray NH Primary Ramadan Event (WH)	21 Lexington, KY (Book) Louisville, KY (Book)	22 Nashua, NH Philadelphia, PA (Book) Washington's Birthday	23 Tea w/ Mrs. Mubarak	24 DE Primary UNICEF Concert Warner Theater
25	26 C-Span Citizen's medals Philadelphia, PA (WLF) w/ MEG	27 AZ, SD Primary Videos	28 Hispanic Scholarship Dinner	29 Media Conference Volunteer Reception	968-DC-00003458	

S 015989

March 1996

HILLARY RODHAM CLINTON

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					1 Duluth, MN (C/G) Minneapolis, MN (C/G)	2
					Camp David, MD	
3 Camp David, ...	4 Advocacy Event Child Conference Foundation Tea	5 TX (C/G) TX, NY, CO, GA, ID, CT, MD, MA, MN, UT, WA Primaries	6 BTF Conference Donahue Show NY (C/G) RON-DC	7 Int'l Visitors Recep NY, MO, ND Primaries Project Children	8 International Women's Day PTA Board of Directors	9 MI, NY, SC, WV, AZ Primary/Caucus Nat'l Council of Jewish Women
10 NY Caucus	11 Chicago, IL- Good Housekeeping Senior Citizens Discussion	12 GL, HI, LA, MS, MO, OK, RI, TN, TX Primaries Int'l Womens Day Event	13 Lunch w/ Queen Noor Potomac, MD	14 American/Ireland Fund Dinner	15 Reception w/ Ireland Rm.	16
17	18	19 IL, MI, OH Primaries	20 Cabines & Spouses Reet. Interviews	21 Radio & TV Dinner Videos	22 Interviews Newspaper Assoc. Sick Children's Hospital	23 WY Caucus
24 Germany	25 Germany Italy RON Ankara, Turkey	26	27	28	29	30 Olympia
	Turkey			Athens, Greece		
31 Santorini Shannon, Ireland						

968-DC-00003459

S 61599C

July 1997

HILLARY RODHAM CLINTON

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968-DC-00003475

October 1997

HILLARY RODHAM CLINTON

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December 1997

HILLARY RODHAM CLINTON

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7 Kennedy Center Honors TODAY Show	8 Carnegie Presentation Congressional Ball Interviews	9 Team Harmony, Boston	10 Asthma Event (T) Hispanic \$ NY Women's Agenda UN Human Rts Speech WLF Lunch (T)	11 NYC Asthma Event	12 Xmas Reception	13 Arkansas Fundraiser Xmas Dinner																																																																																												
14 Christmas in Washington	15 Children's Natl Medical Ctr	16 Friend of Children Awards Press Party (T) Toys R Us Playroom visit	17	18 CBS Sunday Morning Children's Event	19 Xmas Dinner	20																																																																																												
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2737

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

FEBRUARY 28th 1997

	TIME		NAME	ACTION
	PLACED	DISC		
OUT	XAX		SPEAKER NEWT GINGRICH WASHINGTON, D.C.	TKLD-OK 2:34 P.M.
YAK	2:09 PM	2:47	[REDACTED]	
OUT	AM			
INC	PM			
OUT	XAX		CONGRESSMAN RICHARD A. GEPHARDT OFC: WASHINGTON, D.C.	TKLD-OK 2:48 P.M.
YAK	2:09 PM	3:04	WHITE HOUSE ADMIN EXT. [REDACTED]	
OUT	AM			
INC	PM			
OUT	XAX		CONGRESSWOMAN CAROLYN Mc CARTHY HEMPSTEAD, N.Y.	TKLD-OK 4:08 P.M.
YAK	3:54 PM	4:13	[REDACTED]	
OUT	AM			
INC	PM			
OUT	XAM		MR. D. STEPHEN GOODIN CELLULAR PHONE NO NUMBER AVAILABLE	MESSAGE PASSED TO PRESUS 11:47 P.M.
INC	11:45 PM			
OUT	AM			
INC	PM			
OUT	AM			
INC	PM			
OUT	AM			
INC	PM			
OUT	AM			
INC	PM		968-DC-00003506	 S 018924

2738

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

MARCH 29th

97

		TIME		NAME	ACTION
		PLACED	DISC		
OUT XX		11:05 AM		MS. MARSHA SCOTT RES: WASHINGTON, D.C. ██████████	INFORMED PRESUS 3:08 P
INC OUT		XX AM			
INC OUT		PM AM			
YY INC OUT		11:06 AM	11:14	MRS. BETTY W. CURRIE RES: ARLINGTON, VA. ██████████	TLKD-OK 11:12 A.M.
		YY PM AM			
INC EXT		PM AM			
		11:23 AM	11:25	MR. DICK KELLEY WASHINGTON, D.C. WHITE HOUSE ADMIN EXT ██████████	TLKD-OK 11:23 A.M.
INC OUT		PM AM			
INC OUT		PM AM			
		11:51 AM	11:54	MR. JOHN D. PODESTA RES: WASHINGTON, D.C. ██████████	TLKD-OK 11:51 A.M.
INC OUT		PM AM			
INC OUT		PM AM			
		4:00 PM		MR. JOHN D. PODESTA OPC: WASHINGTON, D.C. ██████████	MR. PODESTA DISCONNECT WHILE RINGING THE PRES 3:02 P.M.
INC OUT		PM AM			
INC OUT		PM AM			
		4:14 PM	4:15	MR. JOHN D. PODESTA OPC: WASHINGTON, D.C. WHITE HOUSE ADMIN EXT ██████████	TLKD-OK 4:14 P.M.
INC		PM			

968-DC-00003510



5 018928

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

MAY 1st

19 97

	TIME		NAME	ACTION
	PLACED	DISC		
XXX INC OUT	2:44 PM	XXX	CONGRESSMAN STENY HOYER OFC: WASHINGTON, D.C. ██████████	HOLD PER MS. BETTY CURRIE 2:50 P.M.
INC OUT	PM	XXX	MRS. ETHEL KENNEDY RES: McLEAN, VA. ██████████	TLKD-OK 3:32 P.M.
XXX OUT	2:47 PM	3:34	GOVERNOR WILLIAM F. WELD OFC: BOSTON, MA. ██████████	TLKD-OK 3:34 P.M.
INC OUT	PM	XXX	SENATOR JOHN McCAIN OFC: WASHINGTON, D.C. ██████████	PER MS. BETTY CURRIE WILL CALL BACK 3:34 P.M.
XXX OUT	2:47 PM	3:41	CONGRESSMAN JOHN M. SPRATT, JR. OFC: WASHINGTON, D.C. ██████████	TLKD-OK 4:20 P.M.
INC OUT	PM	XXX	SENATOR TRENT LOTT OFC: WASHINGTON, D.C. ██████████	TLKD-OK 4:34 P.M.
XXX OUT	3:53 PM	4:29		
INC OUT	PM	XXX		
XXX OUT	4:33 PM	4:46		

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THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JULY 4th

.19 97

	TIME		NAME	ACTION
	PLACED	DISC		
OUT	2:01 AM	2:01	MESSAGE: "OPERATOR, CALL ME AT 8:00 A.M. THANKS."	ACKNOWLEDGED 2:01 A.M.
XXX OUT	XXX AM			
INC OUT	PM 10:19 AM	10:25	MR. BRUCE R. LINDSEY CELLULAR PHONE NO NUMBER AVAILABLE	TLKD-OK 10:22 A.M.
XXX OUT	XXX AM			
INC OUT	PM 10:22 AM	10:36	MS. NANCY V. HERNREICH WASHINGTON, D.C. NO NUMBER AVAILABLE	TLKD-OK 10:25 A.M.
XXX OUT	XXX AM			
INC OUT	PM 10:24 AM	10:38	MS. STEPHANIE S. STREETT RES: WASHINGTON, D.C. [REDACTED]	TLKD-OK 10:37 A.M.
INC OUT	PM AM			
INC OUT	PM 10:50 AM	10:56	MR. JOHN D. PODESTA OFC: WASHINGTON, D.C. WHITE HOUSE ADM. EXT. [REDACTED]	TLKD-OK 10:51 A.M.
XXX OUT	XXX AM			
INC OUT	PM 3:46 PM	4:07	SECRETARY ROBERT E. RUBIN TREASURY OPERATOR NO NUMBER AVAILABLE	TLKD-OK 3:46 P.M.
INC				

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THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JULY 14th 19 97

	TIME		NAME	ACTION
	PLACED	DISC		
OUT	XXX		CONFERENCE CALL	
INC	9:59 PM	10:54	MR. BOB BENNETT LIVINGSTON, MT.	TLKD-OK 10:03 P.M.
OUT	AM		[REDACTED]	
INC	PM		AND MR. CHARLES RUFF	
OUT	AM		RES: WASHINGTON, D.C. [REDACTED]	
INC	PM			
OUT	AM			
INC	PM			
OUT	XXX		MR. BRUCE R. LINDSEY RES: WASHINGTON, D.C.	TLKD-OK 10:55 P.M.
INC	10:54 PM	11:01	[REDACTED]	
OUT	AM			
INC	PM			
OUT	AM			
INC	PM			
OUT	AM			
INC	PM			
OUT	AM			
INC	PM			
OUT	AM			
INC	PM			
OUT	AM			
INC	PM			
OUT	AM			


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THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

AUGUST 16th 1997

	TIME		NAME	ACTION
	PLACED	DISC		
OUT	1:10 AM	1:10	MESSAGE: "OPERATOR, CALL ME AT 8:00 A.M. THANKS."	ACKNOWLEDGED 1:10 A.
XXX OUT	XXX AM			
INC	PM			
XXX OUT	8:00 AM	8:00	WAKE-UP BY WHITE HOUSE OPERATOR	COMPLETED 8:00 A.M.
INC	XXX AM			
OUT	AM			
INC	PM			
OUT	9:18 AM	9:19	MRS. BETTY W. CURRIE OFC: WASHINGTON, D.C. WHITE HOUSE ADMIN EXT. [REDACTED]	TLKD-OK 9:18 A.M.
XXX OUT	XXX AM			
INC	PM			
OUT	XXX AM		MR. LOU HOLTZ RES: ORLANDO, FL. [REDACTED]	TLKD-OK 9:05 P.M.
XXX OUT	5:48 PM	9:09		
OUT	AM			
INC	PM			
XXX OUT	XXX AM		MRS. HILLARY RODHAM CLINTON RES: WASHINGTON, D.C. WHITE HOUSE ADMIN EXT. [REDACTED]	MRS. CLINTON DISCONNECTED 6:05 P.
INC	6:05 PM			
OUT	AM			
INC	PM			
OUT	AM		MESSAGE: "OPERATOR, TELL MRS. CLINTON THAT I AM FINISHED HERE AND THAT I'M"	 S 018976
XXX OUT	6:06 PM	6:06		

(CONTINUE NEXT SHEET)

Thursday, November 13, 1997

The Iraq problem continue to escalate, in spite of the UN's resolution yesterday condemning their actions against American soldiers.

The President responded to their threats yesterday to expell Americans from the country, with his own condemnation and warnings, during remarks before a Bill signing.

Today...

The President arrived at the Oval office at 8:05 a.m., and had an 8:15 a.m., **Foreign Policy Meeting** this morning in the Cabinet Room.

Participants in this meeting were: Veep, Sec. Albright, Sec. Cohen, Ambassador Richardso, CIA Director Tenet, Erskine, Sandy, Gen. Shelton, Ambassador Pickering, Slocombe, Steinberg, Fuerth, Riedel, Welch, Pace King.

At 9:15 a.m, the President made a foreign policy call to

At 9:45 a.m., the President Signed the Labor/Health/HHS bill in the Oval Office.

The President golfed with Congressional leaders today from 12 noon to 4 p.m. at the Army/Navy Golf Course in Arlington (18 holes)

The President greeted 50 guests in the State Dining Room at 5:22 p.m., at a **Reception for Democrats who supported the FastTrack Bill.**

Attendants at the Reception, included: Representatives: Ken Bentsen, Marion Berry, Earl Pomeroy, Harold Ford, Jr., Robert Matsui, Sheila Jackson-Lee, William Jefferson, E.B. Johnson, David Price, Anna Eshoo, Bob Clement, Jim Davis, Cal Dooley, Vic Fazio, Norm Dicks, Vick Synder, Charles Stenholm, Ike Skelton, David Skaggs, Ellen Tauscher, Jane Harman, Matthew Martinez, Lloyd Doggett, Jim McDermott, Chet Edwards, Bob Etheridge, Ralph Hall, Lee Hamilton, Darlene Hooley, Zoe Lofgren, James Moran, Owen Pickett, John Tanner, Peter Deutsch.

Administration officials included: Secretary Glickman, Daley, Albright, Shalala, Richardson, Browner, Pena, Slater, Alvarez, Herman, Berger, Goodie and Silverman.

He proceeded to the Oval at 6:34 p.m. He was briefed by Sandy, Tarullo, Brainard and Dobbins. He took a Foreign Call
at 6:47 p.m.


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