

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- X  
IN RE: :  
GRAND JURY PROCEEDINGS :  
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Grand Jury Room No. 2  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001

Thursday, July 30, 1998

The testimony of NELSON ULYSSES GARABITO was taken  
in the presence of a full quorum of Grand Jury 97-5,  
impaneled on December 5, 1997, commencing at 10:22 a.m.,  
before:

TIMOTHY SUSANIN  
TERRENCE GALLIGAN  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

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1 BY MR. SUSANIN:  
2 Q It's Mr. Garabito is how you pronounce that; is  
3 that right?  
4 A That's correct.  
5 Q And you are a Special Agent with the PPD in the  
6 Secret Service?  
7 A Yes, sir.  
8 Q Sir, we just met briefly outside, let me  
9 reintroduce myself. My name is Timothy Susanin. I'm an  
10 Associate Independent Counsel. To my left is my colleague  
11 from the Independent Counsel's Office, Terrence Galligan.  
12 Across from me is the court reporter and to Mr. Galligan's  
13 left are two members of the grand jury, and the ladies and  
14 gentlemen to your right there comprise the rest of the grand  
15 jury that you're testifying in front of today.  
16 Before we begin, I briefly want to review some  
17 rights and obligations you have as a witness before the grand  
18 jury today.  
19 First, as our Deputy Foreperson has already stated,  
20 we are going to ask you to keep your voice elevated so  
21 everyone in the back can hear. We are also going to ask that  
22 you give us verbal answers as opposed to nods or shrugs so  
23 that the court reporter can take everything down.  
24 As you know, you were just sworn in, you're under  
25 oath. You have an obligation to testify truthfully before

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1 PROCEEDINGS  
2 Whereupon,  
3 NELSON ULYSSES GARABITO  
4 was called as a witness and, having been first duly sworn by  
5 the Foreperson of the Grand Jury, was examined and testified  
6 as follows:  
7 EXAMINATION  
8 BY MR. SUSANIN:  
9 Q Good morning, sir.  
10 A Good morning.  
11 Q Could you please state your full name for the  
12 record?  
13 A Nelson Ulysses Garabito.  
14 Q Could you spell your last name for us?  
15 A G-a-r-a-b-i-t-o.  
16 Q We've been misspelling your name, so I've got to  
17 write this down.  
18 A JUROR: Could you spell that again?  
19 BY MR. SUSANIN:  
20 Q Once more.  
21 A Last name is Garabito, G-a-r-a-b-i-t-o.  
22 THE DEPUTY FOREPERSON: Sir, we would ask you to  
23 keep your voice up. The lady in the back also has to hear  
24 every one of your answers.  
25 THE WITNESS: Thank you.

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1 the grand jury. Do you understand that, sir?  
2 A Yes, I do.  
3 Q And do you understand that includes not misleading  
4 the grand jurors in any way. For instance, saying you don't  
5 know or you don't remember something when in fact you do know  
6 or do remember that something. Do you understand that?  
7 A Yes, I do.  
8 Q You have the right to counsel. You do not have the  
9 right to have counsel in the room with you here, but you do  
10 have the right to have counsel outside and to stop the  
11 proceedings if you feel you need to go out and consult with  
12 your attorney or attorneys. Do you understand that?  
13 A Yes, I do.  
14 Q And is Mr. Tom Dougherty, D-o-u-g-h-e-r-t-y, here  
15 from Secret Service Counsel's Office on your behalf today?  
16 A Yes, he is.  
17 Q And there is another attorney by the name of Matt  
18 from the Office as well?  
19 A That's correct.  
20 Q What's his last name?  
21 A Spades? Spacta? Something along those lines.  
22 Q Are there any other Secret Service attorneys here  
23 on your behalf, sir?  
24 A No, sir.  
25 Q And do you have a private attorney that you've

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<p>1 hired to represent you here today?</p> <p>2 A No. I do not.</p> <p>3 Q Special Agent Garabito, you also have under the</p> <p>4 Fifth Amendment of the Constitution a right against self-</p> <p>5 incrimination. What that means is if a truthful answer to a</p> <p>6 question posed by me would tend to incriminate you, you have</p> <p>7 the right to refuse to answer that question. Do you</p> <p>8 understand that?</p> <p>9 A Yes, I do.</p> <p>10 Q Do you have any questions for me about these rights</p> <p>11 or obligations before begin?</p> <p>12 A No, sir.</p> <p>13 Q I want to begin by asking you about your</p> <p>14 employment, as you said earlier, with the Presidential</p> <p>15 Protective Detail with the Secret Service; is that correct?</p> <p>16 A That is correct.</p> <p>17 Q How long have you been with the PPD?</p> <p>18 A Three years and three months.</p> <p>19 Q How long have you been with the Secret Service</p> <p>20 altogether, sir?</p> <p>21 A It will be 10 years August 1st.</p> <p>22 Q And you've been an agent the entire 10 years?</p> <p>23 A Yes, sir.</p> <p>24 Q You've never been with the Uniformed Division?</p> <p>25 A No, sir.</p>	<p>1 Q Let me ask it from a different end, then. Do you</p> <p>2 know how soon after you started at the White House in April</p> <p>3 of '95 you first saw Ms. Lewinsky? Whether it's a month</p> <p>4 later, a year later, two years later?</p> <p>5 A Probably a year later.</p> <p>6 Q So you think you might have seen her by spring of</p> <p>7 '96?</p> <p>8 A That's correct.</p> <p>9 Q Do you know before the story broke in January of</p> <p>10 this year, 1998, how far back from that date was the last</p> <p>11 time you saw her?</p> <p>12 A No, sir. That would be very unclear to me.</p> <p>13 Q Can you tell the grand jurors at least whether it</p> <p>14 was a matter of months or a year or two?</p> <p>15 A No. Several months, two to three months, I'd say.</p> <p>16 Q So is it fair to say you saw her sometime towards</p> <p>17 the end of 1997?</p> <p>18 A That would be a fair guess, yes.</p> <p>19 Q Now I believe you said that you had seen Ms.</p> <p>20 Lewinsky often delivering papers and that type of thing in</p> <p>21 the White House.</p> <p>22 A That is right.</p> <p>23 Q Did you see her in the West Wing?</p> <p>24 A Yes, sir.</p> <p>25 Q Did you see her in areas other than the West Wing?</p>
<p>Page 6</p> <p>1 Q How many of those 10 years have you worked in</p> <p>2 Washington? Did you start right out 10 years ago here in</p> <p>3 D.C.?</p> <p>4 A No, sir. I began in Newark, New Jersey, then San</p> <p>5 Juan, Puerto Rico, and I arrived in Washington April 29th of</p> <p>6 1995.</p> <p>7 Q So you arrived here to start directly with the PPD;</p> <p>8 is that right?</p> <p>9 A Yes, sir.</p> <p>10 Q Now let me start off by asking you if you know a</p> <p>11 woman by the name of Monica Lewinsky.</p> <p>12 A Yes, I do. I know her by name since the press</p> <p>13 releases came out.</p> <p>14 Q Would that be in January of this year, roughly?</p> <p>15 A That's correct.</p> <p>16 Q That this story first hit the media?</p> <p>17 A That's correct.</p> <p>18 Q Did you know her before you knew her by name in</p> <p>19 January of this year, did you know her to see?</p> <p>20 A Yes, sir, I did.</p> <p>21 Q How long before January did you know her to see?</p> <p>22 A I would be unclear on that. I would remember</p> <p>23 seeing her often through the White House delivering what</p> <p>24 appeared to be papers or documents from one office to</p> <p>25 another, from one side of the White House to another.</p>	<p>Page 8</p> <p>1 A Yes, sir.</p> <p>2 Q What areas would those be?</p> <p>3 A The area we call the colonnade and walking towards</p> <p>4 the residence part or sometimes in the residence section</p> <p>5 walking through the residence coming from the East Wing of</p> <p>6 the White House.</p> <p>7 Q All right. Let me back up a bit. The West Wing is</p> <p>8 where the Oval Office is; is that correct?</p> <p>9 A That's correct.</p> <p>10 Q And you've seen Ms. Lewinsky there?</p> <p>11 A Yes.</p> <p>12 Q In and around the Oval Office?</p> <p>13 A Yes, sir.</p> <p>14 Q Explain what the colonnade is for the ladies and</p> <p>15 gentlemen of the grand jury.</p> <p>16 A It's an area that's outside. You can walk -- it's</p> <p>17 a paved area that you can walk from the West Wing area of the</p> <p>18 White House where the Oval Office is, it takes you towards</p> <p>19 the residential part of the White House where the private</p> <p>20 quarters are.</p> <p>21 Q And is that kind of like a sidewalk with a little</p> <p>22 roof over it?</p> <p>23 A Yes, sir, it is.</p> <p>24 Q Are there columns on one side?</p> <p>25 A Yes, there are.</p>

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<p>1 Q And that's why it's called the colonnade?</p> <p>2 A I don't know that, but, yes, you are correct.</p> <p>3 Q And you had seen Ms. Lewinsky out on the colonnade.</p> <p>4 A Sure.</p> <p>5 Q And, again, that connects the West Wing complex to</p> <p>6 the residence?</p> <p>7 A That's correct.</p> <p>8 Q And the residence is in the main part of the White</p> <p>9 House?</p> <p>10 A That's correct.</p> <p>11 Q You also said you saw Ms. Lewinsky walking towards</p> <p>12 the residence. Would that be some area other than the</p> <p>13 colonnade?</p> <p>14 A Not towards the residence -- well, walking towards</p> <p>15 the residence from the West Wing back towards the residence.</p> <p>16 I'm assuming she would come from somewhere in the East Wing</p> <p>17 of the White House because at times I would see her walking</p> <p>18 through the residence towards the West Wing. And sometimes</p> <p>19 if we were stationed at the West Wing part, we could see her</p> <p>20 departing the West Wing going back towards the residence.</p> <p>21 Q But that's all inside?</p> <p>22 A I don't understand.</p> <p>23 Q Well, if you saw Ms. Lewinsky walking towards the</p> <p>24 residence on the colonnade, she's outside.</p> <p>25 A Yes.</p>	<p>1 A I might have said that, but I was incorrect.</p> <p>2 Q Okay. And you want to correct that now?</p> <p>3 A Yes.</p> <p>4 Q Okay. Go ahead and correct that.</p> <p>5 A Sometime, as I said, spring of '96 to fall of '96</p> <p>6 is the time I remember.</p> <p>7 Q Okay. And would that roughly be the same months,</p> <p>8 October of '96, somewhere in there roughly?</p> <p>9 A Yes, sir.</p> <p>10 Q And let me go back using those new parameters and I</p> <p>11 appreciate you correcting that. From roughly the spring of</p> <p>12 '96 towards the end of '96, when you say that you had seen</p> <p>13 Ms. Lewinsky often, try to give the grand jurors a better</p> <p>14 sense, if you could, of what you mean by "often." Would you</p> <p>15 see her on a daily basis? Would you see her on a weekly</p> <p>16 basis? A monthly basis? That kind of thing.</p> <p>17 A At the time I was assigned to what's called our</p> <p>18 Transportation Section, we drive the limousines and so forth,</p> <p>19 and during that time, we would be assigned to come back and</p> <p>20 work -- let me back up.</p> <p>21 The Transportation Section is away from the White</p> <p>22 House. It's approximately six blocks away. During that</p> <p>23 time, we would be assigned once or twice a week to come back</p> <p>24 to the White House and work with the shift, which are the</p> <p>25 people around the President that follow him throughout the</p>
<p>Page 10</p> <p>1 Q My question is when you saw Ms. Lewinsky walking</p> <p>2 from the East Wing through the residence to the West Wing,</p> <p>3 that's inside.</p> <p>4 A That is correct.</p> <p>5 Q And did you ever see her walk, making that same</p> <p>6 trip in the opposite direction? In other words --</p> <p>7 A Yes.</p> <p>8 Q -- from the West Wing through the residence back to</p> <p>9 the East Wing, but inside as opposed to out on the colonnade?</p> <p>10 A Yes, sir.</p> <p>11 Q Thanks. Now just to pick up on your use of the</p> <p>12 word, "often," and I know these dates are rough and you're</p> <p>13 giving us the best you can, if you saw Ms. Lewinsky roughly</p> <p>14 from April of '96 to maybe September or October of '97, which</p> <p>15 would be two or three months before this story broke in</p> <p>16 January --</p> <p>17 A I'm sorry. That is not what I intended to say. I</p> <p>18 think more like '96, towards the end of '96.</p> <p>19 Q Would be the last time you saw --</p> <p>20 A Right. Spring of '96 towards fall of '96.</p> <p>21 Q Okay. Let me back up then to make sure I have this</p> <p>22 right. I had asked you how long before the story broke in</p> <p>23 January of this year, '98, was the last time you saw Ms.</p> <p>24 Lewinsky. I thought you had said two to three months before</p> <p>25 that, meaning towards the end of '97.</p>	<p>Page 12</p> <p>1 White House. So, once or twice a week you didn't have a</p> <p>2 driving assignment, you would be sent to help out the shift.</p> <p>3 It was during this time that I remember seeing her, so if I</p> <p>4 was there once or twice a week, and being posted in different</p> <p>5 areas, I could see her going back and forth maybe twice,</p> <p>6 three times a day -- not necessarily every day I was there,</p> <p>7 but I do recall her, you know -- especially, if she went in</p> <p>8 one direction, I could anticipate seeing her coming back in</p> <p>9 the other direction ten minutes later. So two or three times</p> <p>10 a day that days that I did happen to see her.</p> <p>11 Q Can you give us an idea of when you worked the</p> <p>12 Transportation Section? Did you start with them as soon as</p> <p>13 you arrived in D.C. in April of '95?</p> <p>14 A No, sir. I think I went to Transportation</p> <p>15 approximately February of '96, and I was in Transportation</p> <p>16 until approximately March of '97.</p> <p>17 Q And let me ask you during the occasions that you</p> <p>18 saw Ms. Lewinsky, do you know what her status was in the</p> <p>19 White House?</p> <p>20 A No, not at that time. I've learned it since. At</p> <p>21 the time, I just thought she was another staff person.</p> <p>22 Q Did you ever see anything that she was wearing to</p> <p>23 indicate whether she was authorized to be in the locations</p> <p>24 where you would see her?</p> <p>25 A Yes. We all have to carry a pass that indicates</p>

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1 that you have access to walk throughout. I can't recall ever  
 2 looking at it specifically to determine if she was staff or  
 3 intern or something, just I would look at it to realize that  
 4 she was authorized to walk back and forth.  
 5 Q Is it fair to say you could see the pass from a  
 6 distance just to make sure she was authorized?  
 7 A That's correct.  
 8 Q But you would have to maybe read the pass to see  
 9 whether she was an intern or an employee or staffer?  
 10 A That's correct.  
 11 Q And are you saying you never read the pass, but  
 12 from a distance, you verified she had a pass?  
 13 A Yes, sir, that's correct.  
 14 Q Is it the same color pass that a staffer and an  
 15 intern would have?  
 16 A I think they would have different colors. Again, I  
 17 never stopped to look at what color she had, but I think  
 18 there would be different passes.  
 19 Q As long as she had a pass, that was good enough for  
 20 you if you were on post?  
 21 A That's correct.  
 22 Q And you don't remember as you sit here what color  
 23 pass she had?  
 24 Let me ask you this, was it part of your job when  
 25 you would come back on occasion to work shift work or to

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1 stand post in the White House, was it part of your job to  
 2 make sure people in the West Wing or other parts of the White  
 3 House had a pass?  
 4 A Yes, sir.  
 5 Q And did she have a pass on those occasions when you  
 6 saw her?  
 7 A Yes.  
 8 Q Do you know if you ever saw Ms. Lewinsky in the  
 9 White House, any part of the White House when she did not  
 10 have a pass?  
 11 A I do not recall that, no.  
 12 Q And aside from the pass, was there ever a time when  
 13 you saw Ms. Lewinsky in the White House that after, to your  
 14 knowledge, she had stopped working there?  
 15 A I believe, I believe I might have seen her on one  
 16 occasion. I cannot be 100 percent certain because I did not  
 17 see a frontal view, I just saw a side view and a rear view.  
 18 I thought it might have been her, but I can't be 100 percent  
 19 certain.  
 20 Q Let me ask you what makes you think that occasion  
 21 -- I understand you to say you believe it was her -- what  
 22 makes you think that that was after her employment at the  
 23 White House?  
 24 A Because I didn't see her for a long period of time,  
 25 so I knew that she wasn't working there. Also, on a -- I

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1 think on a movement to the Pentagon, again I was driving one  
 2 of the vehicles. I don't remember if it was limo or back-up  
 3 limo; so, obviously, we park at -- we arrive at our location  
 4 and all the drivers stay with their vehicles. The people  
 5 going inside go inside. While I was outside I saw her and,  
 6 you know, just smiled and said, "Hello," and assumed that she  
 7 was, what's called "working," doing the advance for the site.  
 8 The staff sends out someone to prepare everything so when the  
 9 President arrives everything is pretty much coordinated.  
 10 I assumed she was setting up the advance for that  
 11 site. And I don't recall exactly how, there were several of  
 12 us in a conversation and I heard her say that she was no  
 13 longer working for the White House, that she was working for  
 14 the Pentagon now. And that's when I realized that she  
 15 wasn't. Because we didn't work every day at the White House,  
 16 I didn't realize that she had already left. When I heard  
 17 that conversation is when I realized she was no longer  
 18 working for the White House, but working at the Pentagon.  
 19 Q So at some point you had personal knowledge from  
 20 her directly that she no longer worked at the White House?  
 21 A That's correct.  
 22 Q And then let me ask you about the occasion where  
 23 you believe it was she that you had seen at the White House  
 24 after employment, was that before or after this movement to  
 25 the Pentagon you just described?

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1 A Way before -- I'm sorry. Way after. Way after.  
 2 Q All right. We'll come back to that in a little  
 3 bit. Let me move back to the occasions that we were speaking  
 4 about where Ms. Lewinsky is still working at the White House.  
 5 During those occasions, did you know her name?  
 6 A No, I did not.  
 7 Q Did she know your name?  
 8 A I don't think so.  
 9 Q Did you have any kind of contact or conversation  
 10 with her on the occasions when you would see her?  
 11 A She was very friendly; besides hello, good morning,  
 12 good afternoon, whatever, that was it.  
 13 Q So she was friendly in demeanor?  
 14 A Yes.  
 15 Q But there was no conversation other than greetings?  
 16 A Correct. That is correct.  
 17 Q Did you ever see her with the President while she  
 18 was an employee of the White House?  
 19 A See her walking? Talking?  
 20 Q Did you ever see her in any way with the President?  
 21 A The only time I recall seeing her with the  
 22 President is on one occasion where she -- I believe -- I  
 23 believe it must have been a weekend only because the way the  
 24 Oval Office area is set up, there is a door that leads to the  
 25 secretary's office and if the secretary is there, that door

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1 is open. And we are always in that area.  
 2 At this point, to the best of my recollection, that  
 3 door was closed and Mrs. Currie, the President's secretary,  
 4 was not there; so, for that reason, I believe it was either a  
 5 weekend or a holiday because she wasn't there. And there  
 6 weren't -- it wasn't a normal day. There wasn't the usual  
 7 traffic of people going back and forth. It was kind of a  
 8 weekend holiday day. And she came I assume from the East  
 9 Wing and she approached with some documents and paperwork.  
 10 Obviously, if Mrs. Currie were there, she would go into the  
 11 secretary's office and enter wherever she needed to go. That  
 12 door was closed, so she came to me.  
 13 I was standing in front of the door that leads to  
 14 the President's office, and she indicated -- I don't know the  
 15 exact words, but she indicated she had some paperwork for the  
 16 President.  
 17 I knocked on the door, excused myself. I indicated  
 18 to the President that there was someone to see him. Not  
 19 exact words, but something to that effect. He, to some  
 20 effect said, "Thank you." Or "Please come in." I allowed  
 21 her in. I closed the door and that was it.  
 22 Q All right. Let me go through this incident with  
 23 you again asking you some questions. First of all, I know  
 24 you've said that you believe this is a weekend or a holiday  
 25 because there wasn't a lot of traffic and Mrs. Currie was

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1 there; is that right?  
 2 A Mrs. Currie was not there.  
 3 Q Mrs. Currie was not there.  
 4 A That is correct.  
 5 Q Can you place this weekend or holiday for us on a  
 6 time line?  
 7 A No, I can't. One thing I've tried to remember is  
 8 when the government shut down that we worked for a week, I  
 9 don't recall those dates, that is the only other time that I  
 10 could possibly think that this could have occurred. If it  
 11 wasn't a weekend or a holiday, then it might have been around  
 12 the time the government shut down; because all I recall is it  
 13 wasn't a regular workday. We didn't have the usual people  
 14 moving back and forth. It was like a down day where the  
 15 President had some work in the Oval Office. We were there  
 16 with him, but it was very low key and there weren't that many  
 17 people going back and forth as it would usually be.  
 18 Q Now, Special Agent Garabito, I take it you're not  
 19 saying you recall it was during the shutdown.  
 20 A No, no, no. No, no. I'm not saying that at all.  
 21 Q You're saying it was during the shutdown or a  
 22 holiday or a weekend; is that fair to say?  
 23 A That is correct. My main recollection is that it  
 24 was not a normal working day. That's what I'm trying to  
 25 clarify.

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1 Q And let me ask you if perhaps you can at least  
 2 place it during the time frame that you spoke about earlier  
 3 when you would see Ms. Lewinsky in the White House.  
 4 In other words, can you place this incident during  
 5 her period of employment at the White House?  
 6 A I think so. It would be between that spring  
 7 '96/fall '96 period. I don't know what her term of  
 8 employment was, but this is the time that I remember.  
 9 Q So to your recollection, she was working at the  
 10 White House either as an intern or employee, but at any rate,  
 11 working at the White House when this happened?  
 12 A Yes. It was at a time where it was customary,  
 13 usual for me to see her, yes.  
 14 Q Do you remember what time of day this took place?  
 15 A No, sir, I do not.  
 16 Q And do you remember where you were working when  
 17 this incident took place?  
 18 A Yes. Directly in front of the door that leads from  
 19 the Oval Office to the Roosevelt Room, directly in front of  
 20 that door.  
 21 Q Okay. So that's a door from a hallway into the  
 22 Oval Office?  
 23 A That is correct.  
 24 Q And as you stand and look at this door, is there a  
 25 little table to the right with a telephone on it?

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1 A Yes, there is.  
 2 Q And as you stand and look at this door, would Mrs.  
 3 Currie's, the secretary's desk and office space be down a  
 4 little ways to your left?  
 5 A That is correct.  
 6 Q And is there another door into the Oval Office from  
 7 Mrs. Currie's area?  
 8 A Yes, sir. Yes, there is.  
 9 Q And as you're back at the door we were just talking  
 10 about with the little table and the telephone in front of it,  
 11 down a ways to your right as you look at that door, would  
 12 there be another door into the Oval Office pantry and dining  
 13 room area?  
 14 A Yes, there is.  
 15 Q So the door you are talking about is really in the  
 16 middle of the dining room-pantry room door which is to the  
 17 right and Mrs. Currie's area and door to the Oval Office  
 18 which is down to the left.  
 19 A That is correct.  
 20 Q And is there a letter and number designation given  
 21 to this door that we're talking about?  
 22 A Yes.  
 23 Q What is that?  
 24 A [REDACTED]  
 25 Q [REDACTED]. And you were on post at [REDACTED], correct?

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1 A I was.  
 2 Q And given that you're a PPD as opposed to Uniformed  
 3 Division, I take it the fact that you're at [REDACTED] means the  
 4 President is in the Oval Office?  
 5 A That's correct.  
 6 Q And that's because you go where the President is as  
 7 a member of the PPD: is that correct?  
 8 A That is correct.  
 9 Q Now was there another PPD agent working with you  
 10 during this incident?  
 11 A Again, since it wasn't a regular working day, the  
 12 door to the secretary's office was locked. On those  
 13 occasions, we -- the supervisor, not "we," the supervisor has  
 14 the latitude to move the posts. If that door is locked,  
 15 there is no reason [REDACTED]  
 16 [REDACTED] directly in front of the secretary's door. If  
 17 that door is locked, [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 And on this occasion, I just don't remember the  
 21 other agent being there [REDACTED] d  
 22 the door that comes from the East Wing through the Press  
 23 area, from that area, I remember seeing her as that door  
 24 opened and she came directly to me. Had there been another  
 25 agent over there, she would have stopped there first before

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1 getting to me. So I remember the door opened, I looked, she  
 2 came over to me and she had -- she showed me the documents  
 3 she had to take inside.  
 4 Q Okay. I'm going to put Ms. Lewinsky aside for a  
 5 minute, but we'll get to that in a second. Let me ask you if  
 6 there were any Uniformed Division officers [REDACTED]  
 7 in the area, maybe even down the hallway that day.  
 8 A When we are stationed, when a PPD Agent is  
 9 stationed [REDACTED] as you said,  
 10 you know, that pantry door to my -- if I'm looking at the  
 11 door, to my right. If I'm standing as I should be, then it's  
 12 to my left.  
 13 Q In other words, it's to your left if your back is  
 14 to [REDACTED] door; is that correct?  
 15 A That is correct.  
 16 Q Do you remember if there was a Uniformed Division  
 17 officer at the pantry door during this incident?  
 18 A I do not remember specifically. I'm saying there  
 19 usually is. There should be someone there. They usually  
 20 hold our posts. When the President comes, [REDACTED]  
 21 [REDACTED]  
 22 Q And you don't recall as you sit here today who the  
 23 Uniformed Division officer was?  
 24 A No, sir.  
 25 Q All right. Getting back to Ms. Lewinsky, could you

Page 23

1 tell the grand jurors where she was when you first saw her on  
 2 this date or during this incident?  
 3 A As I said, when the door opened, the doors that are  
 4 beyond the secretary's office, beyond the Cabinet Room that  
 5 lead to the Press area, as I'm standing with my back to the  
 6 Oval Office [REDACTED]. When those doors  
 7 opened is when I looked and I saw her. That's the first time  
 8 I saw her approaching, approaching the office.  
 9 Q And where do those doors lead to? Do those lead  
 10 towards the residence in the East Wing?  
 11 A That is correct. If you go down that and make a  
 12 right, it will take you right into the colonnade, right  
 13 towards the East Wing.  
 14 Q So, Ms. Lewinsky is coming from that general  
 15 direction.  
 16 A Correct.  
 17 Q And can you tell us what you remember about how she  
 18 looked when you saw her? Could you describe what she was  
 19 wearing, how she appeared, what she was carrying?  
 20 A No, I don't recall much about what she was wearing.  
 21 I just remember it was a large yellow manila envelope which I  
 22 assumed had documents in it. I don't recall specifically how  
 23 she was dressed.  
 24 Q And did she walk right up to you?  
 25 A Yes. That's my recollection, that there was no

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1 other agent there, so that's why she came directly to me.  
 2 Q And had you recognized her by that point? Had you  
 3 seen her around the White House by that time?  
 4 A Yes, yes, sir.  
 5 Q What happens when she gets up to you?  
 6 A She indicates in one format or another that she has  
 7 documents that the President is waiting for or asked for.  
 8 Q And during the course of your shift work in the  
 9 West Wing, did that strike you as usual or unusual that  
 10 somebody would come in in this manner with papers to see the  
 11 President?  
 12 A No, it was not unusual. The only thing unusual  
 13 about it is that they would approach me. Usually, Mrs.  
 14 Currie is there and they go through her. Since Mrs. Currie  
 15 was not there, I was the only person that could give her  
 16 access to the office. That was the only thing unusual.  
 17 Q Did Ms. Lewinsky know the President was in the Oval  
 18 Office to your knowledge? Or did she inquire as to whether  
 19 he was in the Oval Office?  
 20 A It appeared to me that she knew, because her  
 21 indication was, "I have these papers for the President." So,  
 22 it's an assumption on my part, but it felt like she had been  
 23 called and told to bring something over or ordered to bring  
 24 something over, you know. She did not ask me is the  
 25 President in. No, she did not.

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1 Q And I take it at some point then you turned towards  
 2 the door and opened the door; is that right?  
 3 A That's correct.  
 4 Q Did you have any additional conversation with Ms.  
 5 Lewinsky after she tells you she has the papers, but before  
 6 you turned to open the door?  
 7 A No, sir.  
 8 Q All right. Now you're at this door because you're,  
 9 of course, guarding the President; correct?  
 10 A Yes, sir.  
 11 Q And you knew him to be in the Oval Office before  
 12 you opened that door?  
 13 A Yes, that's why I'm standing there, yes.  
 14 Q Okay. Was anyone in there with him at that time,  
 15 or was he alone?  
 16 A I can't -- I don't know that. When you open the  
 17 door, obviously, I didn't have to open the door totally. I  
 18 just opened it enough to see him and if I'm at the door and I  
 19 open it, his desk is right there, so I could open the door a  
 20 third of the way, see him, and I just said something to the  
 21 effect, "Mr. President, there's someone here to see you."  
 22 Q All right. Let me interrupt you there before we  
 23 pick up again. How long had you been on post to the best of  
 24 your recollection by the time this incident takes place?  
 25 A Perhaps -- I remember being there only a short time

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1 after that, so I would say maybe 10 to 15 minutes.  
 2 Q And how long are you typically on that post?  
 3 A We may be there, again, depending on what type of  
 4 day it is, we may be there approximately 20 minutes.  
 5 Q So, if that was a 20-minute shift and you recall  
 6 leaving the shift a few minutes after Ms. Lewinsky goes in,  
 7 you, therefore, are assuming this happened 10 or 15 minutes  
 8 into the shift; is that what you're saying?  
 9 A Yes. Yes, sir.  
 10 Q And do you have any recollection as to whether this  
 11 was the morning shift or the night shift? Do you recall  
 12 daylight? Darkness?  
 13 A Daylight, yes. Daylight, yes.  
 14 Q It happened during the day?  
 15 A Daylight.  
 16 Q Do you remember what time of day?  
 17 A No, sir, I do not.  
 18 Q In the 10 to 15 minutes that you had been on duty  
 19 there, had anyone else gone into the Oval Office?  
 20 A No, sir.  
 21 Q Do you recall where you had been before you took  
 22 [redacted] ?  
 23 A What we call "down," so I wasn't -- I was  
 24 [redacted].  
 25 Q Is that on a break?

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1 A You're never on a break, but you're down. You're  
 2 not standing at a post. You're down, ready but down,  
 3 downstairs.  
 4 Q Okay. And how long is the down shift?  
 5 A It depends on how many posts we're holding.  
 6 Usually, I'd say maybe 40 minutes.  
 7 Q Do you remember where you were before you were down  
 8 that day?  
 9 A Again, depending on the rotation, I would have been  
 10 on a post that's outside on the colonnade.  
 11 Q Okay. Do you remember seeing the President on this  
 12 day [redacted] ?  
 13 A No, sir, I can't remember that specifically.  
 14 Q All right. Do you know how long before you took  
 15 the E-6 post, the President moved to the Oval Office?  
 16 A No, sir, I cannot recall that.  
 17 Q Now, you said you don't recall if you saw the  
 18 President that day [redacted] ?  
 19 A Correct.  
 20 Q If you had been out on the colonnade before you  
 21 were down, would you have seen the President if he was in the  
 22 Oval Office?  
 23 A No, because for me to be on the colonnade, he would  
 24 already be in the office.  
 25 Q All right. And do you remember that you were in

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1 the colonnade before you were down?  
 2 A No. For example, if we were in the residential  
 3 part of the house and I were down on that side and he moved  
 4 at that point, [redacted] so I would have  
 5 been on the other side when he walked over. And when it was  
 6 my turn to come on post, [redacted], so I would  
 7 not have seen him on the walkover or been on post as he  
 8 walked over.  
 9 Q Now in the 10 or 15 minutes you were [redacted]  
 10 before Ms. Lewinsky came, you did not let anyone else into  
 11 the Oval Office?  
 12 A I do not recall anyone else entering.  
 13 Q When you assumed the post, are you ever told by the  
 14 person you're replacing, "Everything's fine. The President's  
 15 in with so-and-so." Or given any information like that?  
 16 Status type of information.  
 17 A Usually very brief. If it's a regular staff  
 18 person, I don't think any comment would be made. If it's out  
 19 of the ordinary, sometimes we'll have 10 or 15 press people  
 20 in there because they're taking some photo op, that we're  
 21 advised of; but if it's a usual -- I wouldn't be told Mrs.  
 22 Currie's in there. I wouldn't be told a staff person is in  
 23 there.  
 24 Q Do you recall whether you were told anything about  
 25 additional people [redacted] ?

1 A I do not recall.  
 2 Q You don't recall whether you saw the President  
 3 [REDACTED]  
 4 A I cannot be certain of that, no.  
 5 Q Is the first time you saw the President after you  
 6 [REDACTED] opened the door?  
 7 A I would say yes.  
 8 Q And did you knock, first?  
 9 A Yes.  
 10 Q Did you wait to get a response?  
 11 A Yes, sir.  
 12 Q What did you hear?  
 13 A "Yes?"  
 14 Q And then you opened the door?  
 15 A Yes, sir.  
 16 Q Tell the ladies and gentlemen of the grand jury  
 17 what you see when you open the door.  
 18 A If you were to open the door completely you would,  
 19 obviously, see the entire Oval Office. I think I'm  
 20 disturbing the President, so I just open it as much as I  
 21 needed to get his attention to me to inform him of why I had  
 22 disturbed him. I told him someone was there to see him, he  
 23 acknowledged and I let the person in and then I closed it.  
 24 So I could -- I only opened the door enough to see where his  
 25 desk was. I did not hold the door open.

1 Q Did you use Ms. Lewinsky's name?  
 2 A I didn't know -- I did not. I did not know her by  
 3 name.  
 4 Q Was there any point at which the President either  
 5 asked who it was or you even with your body language kind of  
 6 turned to signal who it was to see whether he indeed wanted  
 7 to see the visitor?  
 8 A That's exactly what I did. I turned to make sure  
 9 that he could see who was standing there, and he acknowledged  
 10 to some effect, "Yes, please come in." Something to that  
 11 effect. And that's when I allowed her through.  
 12 Q All right. Now did you kind of gesture in her  
 13 direction as you've just done now?  
 14 A Yes, sir.  
 15 Q You turned and kind of gestured towards Ms.  
 16 Lewinsky?  
 17 A Mm-hmm. Mm-hmm.  
 18 Q And what did the President say then?  
 19 A Something to the effect of, "Yes?" Or "Please come  
 20 in." Something like that.  
 21 Q And did you hear Ms. Lewinsky say anything during  
 22 this whole evolution while you're opening the door or talking  
 23 to the President, gesturing to Ms. Lewinsky, up until the  
 24 time you closed the door?  
 25 A No, sir.

1 Q Let me ask you a few questions about that. Was the  
 2 President at his desk?  
 3 A Yes, he was.  
 4 Q Do you recall how he was dressed?  
 5 A I would say casual. Casual, maybe a golf shirt,  
 6 something to that effect.  
 7 Q Okay. And what makes you say that?  
 8 A Just I don't recall it being a suit.  
 9 Q All right. And what was he doing at his desk? Do  
 10 you remember in any more detail?  
 11 A Just at his desk, this position. (Indicating.)  
 12 Not necessarily a pen, but at his desk.  
 13 Q And tell the ladies and gentlemen what you see Ms.  
 14 Lewinsky do up until the time you shut the door.  
 15 A She stood behind me as I opened the door. Once I  
 16 got the President's acknowledgement, she walked in.  
 17 Q And where was she when you closed the door?  
 18 A Beyond the door. I closed the door behind me.  
 19 Q Was she walking?  
 20 A Yes, walking towards, towards him.  
 21 Q Towards the desk?  
 22 A Yes, sir.  
 23 Q And before she did that, you said to the President,  
 24 "You have a visitor." Or something to that effect?  
 25 A "Someone here to see you." Something like that.

1 Q And did Ms. Lewinsky leave that door to your  
 2 knowledge in the remaining minutes of your shift?  
 3 A No, sir.  
 4 Q And do you recall who replaced you on the shift?  
 5 A No, sir.  
 6 Q Do you recall where you went next?  
 7 A No, not specifically, again, because it wasn't a  
 8 normal day. Normally, I would have gone to [REDACTED] the  
 9 door in front of the secretary. I don't think I went there.  
 10 I think I went to one of the outside posts.  
 11 Q Now, just getting back to your earlier testimony  
 12 that you had seen Ms. Lewinsky often during this period in  
 13 the White House and you've just finished telling us about  
 14 this specific incident where you saw her. Were there other  
 15 incidents during this time -- again, this is the period where  
 16 you had seen her at several locations around the White House,  
 17 the colonnade, walking to and from the East Wing, on the  
 18 interior, in the West Wing, were there any other incidents  
 19 other than the one you just described that involved both Ms.  
 20 Lewinsky and the President?  
 21 A No, sir.  
 22 Q Did you ever see her with the President on any  
 23 other occasion?  
 24 A No, sir.  
 25 Q Did you ever see her go into an area where you knew

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1 the President to be on any other occasion?  
 2 A No, sir.  
 3 Q Did you ever hear that she was with the President  
 4 on any other occasion?  
 5 A No, sir.  
 6 Q Did you ever hear any rumors about her being alone  
 7 with the President?  
 8 A No, sir.  
 9 Q On the other occasions where you saw Ms. Lewinsky  
 10 in the White House and, again, I want to get back to the ones  
 11 you described as "often," when you were filling in at the  
 12 White House from your Transportation duties. Other than the  
 13 Oval Office incident you just described, was there anything  
 14 noteworthy or significant that the grand jury should know  
 15 about those other occasions where you would see her at  
 16 various locations in the White House?  
 17 A No, nothing I can recall, no.  
 18 Q Were each of those other instances basically of a  
 19 similar nature as with regard to what you saw?  
 20 A I saw her just walking by with documents.  
 21 Q Well, just in terms of generally what you saw.  
 22 A Similar in nature to what? All the incidents  
 23 amongst themselves, were they similar?  
 24 Q Right.  
 25 A Yes. Basically transporting documents back and

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1 forth.  
 2 Q Now, I want to move to the incident where you're on  
 3 a Transportation detail to the Pentagon. Is it possible for  
 4 you to estimate for the grand jurors how long, how much time  
 5 went by between that incident where you see Ms. Lewinsky at  
 6 the Pentagon and the last time you had seen her at the White  
 7 House?  
 8 A No, sir, I can't. That is why it was surprising to  
 9 me that she was no longer employed there, because I didn't  
 10 know how, you know, I didn't notice that she was gone. Then,  
 11 again, I wasn't there every day to see, to notice that she  
 12 was missing.  
 13 Q Let me shift gears back to the Oval Office incident  
 14 we were speaking about where Ms. Lewinsky went into the Oval  
 15 Office. Let me just ask you a follow-up question there on  
 16 timing.  
 17 You had talked about seeing Ms. Lewinsky on a  
 18 number of occasions, as you say, "often," in this period  
 19 where she worked at the White House. Was the incident where  
 20 you let her in on a holiday or a weekend into E-6, was that  
 21 the first time you had ever seen her while she worked at the  
 22 White House?  
 23 A No, sir.  
 24 Q So there were other times you had seen her before  
 25 that.

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1 A Yes.  
 2 Q Was that the last time you had seen her when she  
 3 worked at the White House?  
 4 A No.  
 5 Q So you had seen her at the White House wearing a  
 6 pass after the Oval Office incident?  
 7 A Sure.  
 8 THE REPORTER: Please keep your voice up, sir.  
 9 THE WITNESS: I'm sorry.  
 10 BY MR. SUSANIN:  
 11 Q Now moving back to the Pentagon trip, I believe you  
 12 said that you and several other Secret Service Agents who  
 13 were working the Transportation detail there waited outside  
 14 the Pentagon while the President was at an event or a meeting  
 15 of some sort in the Pentagon; is that correct?  
 16 A That is correct.  
 17 Q Do you remember what time of year this was?  
 18 A Hot. Very hot. Summertime.  
 19 Q And how do you remember it was summertime?  
 20 A Just the heat, being outside.  
 21 Q How many agents are on the Transportation detail  
 22 that would have been with you that day waiting by the car?  
 23 A Perhaps four, four drivers and four different  
 24 vehicles.  
 25 Q And were you a driver of one of the vehicles?

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1 A Yes, I was.  
 2 Q What were the names of the other individuals you  
 3 were with?  
 4 A I do not recall.  
 5 Q Do you recall any of them?  
 6 A No, sir.  
 7 Q Do you recall roughly how long you waited outside  
 8 the Pentagon during this?  
 9 A Probably over an hour, an hour-and-a-half.  
 10 Q How soon after you got to the Pentagon -- do you  
 11 remember what time of day it was, incidentally?  
 12 A I would say 11:00 or 12:00. I want to say high  
 13 noon, again, because of the heat and the sunlight.  
 14 Q Do you know where the President was going in the  
 15 Pentagon?  
 16 A No.  
 17 Q Do you remember what the event was he was  
 18 attending?  
 19 A No, sir.  
 20 Q How long in that hour or hour-and-a-half period  
 21 that you're waiting outside the Pentagon was it that you  
 22 first saw Ms. Lewinsky?  
 23 A Oh, no. We saw her as soon as we arrived. She was  
 24 at the door. That is why I assumed that she was part of the  
 25 advance team for this particular event. Once we arrive, we

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1 have to reposition the vehicles and so forth, and it was  
 2 during that time that I saw her, and I heard the  
 3 conversation.  
 4 Q And when you say you saw her right at the door, is  
 5 that the door to the car? The door to the Pentagon?  
 6 A The door to the Pentagon.  
 7 Q So you drive right up to the Pentagon?  
 8 A Yes.  
 9 Q And when you say you thought she was part of the  
 10 advance, are you saying you thought she was part of a White  
 11 House Office that went out to prepare the trip?  
 12 A That is correct.  
 13 Q So you thought she was still an employee of the  
 14 White House?  
 15 A That is correct.  
 16 Q Can you remember with specificity when you first  
 17 saw Ms. Lewinsky during this incident? In other words, did  
 18 you see her as the car was still moving, pulling up to the  
 19 door? Did you see her before or after the President gets out  
 20 of the car? Before or after the President actually goes into  
 21 the Pentagon? That type of thing.  
 22 A After. After the President had entered.  
 23 Q So you don't see her while the car's moving?  
 24 A No. I'm driving, no.  
 25 Q And the car stops, the President gets out and

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1 enters the building.  
 2 A Yes.  
 3 Q And then you are first aware of Ms. Lewinsky?  
 4 A Correct. At that point, we need to reposition the  
 5 vehicles and get ready for the departure, so that's when I  
 6 can step out and that's when I noticed her.  
 7 Q You noticed her when you stepped out of the car?  
 8 A Yes, to the best of my recollection.  
 9 Q After you repositioned the car?  
 10 A No, no. We're there. Then we have to, you know,  
 11 we can all get out and start talking about, "Hey, let's go  
 12 turn around there." Or whatever we need to do. So we  
 13 usually come out and discuss the way we want to do it.  
 14 "Let's put this one first, second," whatever. And at that  
 15 point when we were speaking is when I noticed that she was  
 16 there.  
 17 Q All right.  
 18 A There was still some staff people going in,  
 19 especially the press is way behind in the motorcade, so  
 20 they're still going in. And I recall her holding the door  
 21 open as other people went through.  
 22 Q Was the President already in the building by the  
 23 time you first saw Ms. Lewinsky?  
 24 A Oh, yes.  
 25 Q Did you see any contact between the President and

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1 Ms. Lewinsky?  
 2 A No, sir.  
 3 Q And is she still holding the door when you first  
 4 see her?  
 5 A Yes. I think she was still holding the door. I  
 6 think there were still some people coming through.  
 7 Q All right. How far are you from her at that  
 8 point?  
 9 A The Pentagon has several steps that come down --  
 10 she was way up at the door, we were down on the street level,  
 11 50 feet, maybe.  
 12 Q All right. So there are some steps going up to  
 13 this door?  
 14 A Yes.  
 15 Q And at some point, you and the other agents speak  
 16 with Ms. Lewinsky?  
 17 A That is correct.  
 18 Q How long after it is from when you first see her  
 19 until you're speaking with her?  
 20 A Whatever time it took for the rest of the press  
 21 people to or whoever was lagging behind to go through. At  
 22 that point, everybody is through. I'm assuming she probably  
 23 let the door go and, you know, she approached us and we might  
 24 have spoken then.  
 25 Q And did you ever leave where you were speaking with

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1 the agents to go closer to her or did she come up to the  
 2 agents' location?  
 3 A I think she came down to us. We wouldn't go away  
 4 from the cars.  
 5 Q And tell us about the conversation from the moment  
 6 she approaches.  
 7 A Nothing in particular, just that she was no longer  
 8 at the White House, that she was now working for the  
 9 Pentagon. And the only reason I remember is because I  
 10 realized at that point that she was no longer at the White  
 11 House. That's the only part that struck me.  
 12 Q Did she come over to speak with you, specifically?  
 13 A No. I don't think so. I think there was, as I  
 14 said, a group of us.  
 15 Q But you recognized her.  
 16 A Yes.  
 17 Q And she recognized you?  
 18 A I would assume so.  
 19 Q Did she ever say hi to you individually or use your  
 20 name?  
 21 A I don't think so.  
 22 Q Did she recognize the other agents?  
 23 A It appeared -- it appeared that way, yes.  
 24 Q Did they recognize her?  
 25 A It appeared that way, yes.

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1 Q All right. And was there any conversation after  
 2 she says, "Hello," and before she says, "I no longer work at  
 3 the White House."  
 4 A I assume there was. Perhaps I wasn't paying  
 5 attention at that point or it's not that's memorable.  
 6 Q And how did it come up that she no longer worked at  
 7 the White House? Do you recall?  
 8 A No, I don't.  
 9 Q Okay. But you remember her addressing that topic  
 10 at some point.  
 11 A That's correct.  
 12 Q Tell the ladies and gentlemen to the best of your  
 13 knowledge what you remember her saying.  
 14 A That she was no longer working at the White House,  
 15 that she was now working for the Pentagon doing pretty much  
 16 the same thing, doing advances, preparing events but doing it  
 17 for the Pentagon now.  
 18 Q And, Special Agent Garabito, let me ask you, did  
 19 she say how long she had been at the Pentagon?  
 20 A I don't think so, no.  
 21 Q Did she mention whether she liked her job at the  
 22 Pentagon?  
 23 A I don't think the conversation was that long.  
 24 Q Did she mention whether she missed the White House?  
 25 A No.

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1 Q What was discussed after she talked about working  
 2 at the Pentagon?  
 3 A That's all I recall. Then she had to -- she went  
 4 inside -- she went inside to finish whatever her duties were  
 5 and then we got busy with our responsibilities.  
 6 Q And how long, all told, from the moment she  
 7 approached you and the agents to the moment she left you and  
 8 the agents would you say she was there?  
 9 A I'd say a few short minutes. She had to finish or  
 10 continue with what she was doing.  
 11 Q And as I've been asking you questions about this  
 12 group conversation with you, other agents and Ms. Lewinsky,  
 13 have you been able to recall in any way who was with you of  
 14 the PPD?  
 15 A No, sir, not in particular, no.  
 16 Q If you do recall that as a result of being here  
 17 today at any time in the future, will you contact my office?  
 18 A No problem, yes.  
 19 Q How long after the Pentagon incident would you say  
 20 it was until the occasion at the White House where you  
 21 believed you saw her?  
 22 A I think that was December of '97.  
 23 Q And what makes you say that?  
 24 A That's all I remember. I remember I went on  
 25 vacation after that throughout the whole, the entire

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1 holidays, so I'm thinking it was either late November or  
 2 early December of '97.  
 3 Q Now this story all hit the media January of '98;  
 4 correct?  
 5 A That's my understanding.  
 6 Q And did you see reports of this on the TV or hear  
 7 about it on the radio?  
 8 A Yes.  
 9 Q And at the time you saw the story break, did you  
 10 recognize Ms. Lewinsky?  
 11 A Yes.  
 12 Q And did it occur to you when the story broke that  
 13 you had seen her fairly recently?  
 14 A Yes.  
 15 Q And you were able to tie that towards the holidays  
 16 or your vacation roughly?  
 17 A I think that's what made me remember that that  
 18 particular incident which wouldn't have been of any  
 19 importance prior to that. Then when I saw the report is when  
 20 I remembered. "You know, I think that was her I saw the other  
 21 day."  
 22 Q All right. Now, you finished up with the  
 23 Transportation Section earlier in '97, in March of '97;  
 24 correct?  
 25 A Yes, March of '97.

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1 Q Where did you go in March of '97?  
 2 A I went back to what's called shift work, working  
 3 around the President.  
 4 Q So if the President was not traveling, you were in  
 5 the West Wing during your workday?  
 6 A Yes, sir.  
 7 Q Is that correct?  
 8 A That is correct.  
 9 Q Tell the ladies and gentlemen of the grand jury  
 10 what you remember about this incident from late November or  
 11 December of '97?  
 12 A Again, I was positioned at [REDACTED] the pantry door  
 13 that you speak of is to my left.  
 14 Q [REDACTED]  
 15 A [REDACTED] just saw Mrs.  
 16 Currie and a female with black hair, about the same size and  
 17 build as Ms. Lewinsky, depart and walk towards -- if you know  
 18 the area, towards the Vice President's Office, away --  
 19 towards the Chief of Staff's Office [REDACTED]  
 20 Q So if you come out the pantry door and take a left,  
 21 [REDACTED]  
 22 A That is correct.  
 23 Q And Mrs. Currie is who?  
 24 A The President's secretary.  
 25 Q Is that Betty Currie?

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<p>1 A Yes.</p> <p>2 Q And do you recall what time of day this was?</p> <p>3 A No, sir.</p> <p>4 Q Do you recall if anyone from the PPD was with you?</p> <p>5 A At my post? No.</p> <p>6 Q How about in the area of your post?</p> <p>7 A No, not at my post. [REDACTED]</p> <p>8 which is far enough away that they can't see the hallway.</p> <p>9 They would not be able to see what I saw.</p> <p>10 Q [REDACTED]</p> <p>11 A That is directly in front of Mrs. Currie's office.</p> <p>12 Q Do you remember any Uniformed Division officers who</p> <p>13 presumably you would have [REDACTED] closer towards the</p> <p>14 pantry door being in the area during this incident?</p> <p>15 A Yes, I do remember an officer. I do remember the</p> <p>16 white uniform standing there, yes.</p> <p>17 Q Do you know who the officer was?</p> <p>18 A No, sir.</p> <p>19 Q Can you describe him? Was it a male?</p> <p>20 A Yes, probably a male.</p> <p>21 Q Can you describe him for us?</p> <p>22 A Looking, seeing, the movement and at the same time</p> <p>23 visualizing an officer there but not that I stopped to look</p> <p>24 to see who he was. Again, at that point, it wasn't anything</p> <p>25 to think about, not until the reports came out a couple of --</p>	<p>1 Ms. Lewinsky when she worked at the White House and the time</p> <p>2 you've seen her subsequently, did it appear to be her from</p> <p>3 the side view of her face?</p> <p>4 A Yes. The only thing that made me believe it was</p> <p>5 her was that quick side view. That was it.</p> <p>6 Q And I understand you believe this to be Ms.</p> <p>7 Lewinsky, but you can't be sure.</p> <p>8 A That is correct.</p> <p>9 Q Is there anything that makes you hesitant to say</p> <p>10 that it was her? Anything specific?</p> <p>11 A The fact that it was so quick. It was just -- I'm</p> <p>12 not looking in that direction generally. I probably out of</p> <p>13 the corner of my eye see a movement, I look, and it's a very</p> <p>14 quick, boom, and they walk away. So it wasn't --</p> <p>15 Q Did you get a -- I'm sorry.</p> <p>16 A So it wasn't something that I was expecting someone</p> <p>17 to come out of that door. It's just I'm looking in all</p> <p>18 directions and I think I probably spotted out of the corner</p> <p>19 of my eye, movements and look and then see a very quick,</p> <p>20 boom, and they're out.</p> <p>21 Q So you turned and looked before the individual</p> <p>22 coming out turns to walk away?</p> <p>23 A I look before the individual gives me her back, is</p> <p>24 that what you mean?</p> <p>25 Q Yes.</p>
<p>1 maybe four weeks later.</p> <p>2 Q I believe you said earlier today you didn't get a</p> <p>3 full frontal look of this person with Mrs. Currie during this</p> <p>4 incident, but you saw a side view and a rear view. Would you</p> <p>5 have seen a side view as they're coming out the pantry door?</p> <p>6 A That is correct.</p> <p>7 Q And then you saw a rear view because they turned</p> <p>8 away from you?</p> <p>9 A That is correct.</p> <p>10 Q All right. Tell us what you saw when you got the</p> <p>11 side view. Did you get a profile of this woman?</p> <p>12 A A pretty quick profile, yes.</p> <p>13 Q And describe what you saw?</p> <p>14 A Just black hair, short black hair, white female,</p> <p>15 about the size and build of Ms. Lewinsky, quickly turned and</p> <p>16 from then on it was just a rear view of Mrs. Currie, whom I</p> <p>17 recognize easily, and this female walking away.</p> <p>18 Q And did it appear to be Ms. Lewinsky as you watched</p> <p>19 from behind?</p> <p>20 A From behind I wouldn't -- if I had just seen her</p> <p>21 from behind, I wouldn't have known.</p> <p>22 Q Okay. Let me ask that a different way, then. Did</p> <p>23 it match Ms. Lewinsky from behind?</p> <p>24 A Yes, yes.</p> <p>25 Q Okay. Now base on all the times that you had seen</p>	<p>1 A Yes. I see a quick side view, a quick profile.</p> <p>2 Q And at that time, did you believe it to be Ms.</p> <p>3 Lewinsky based on that quick profile?</p> <p>4 A That's right. At that time, I really didn't think</p> <p>5 about it. I thought about it after the report came out.</p> <p>6 Q I see. Do you know a Uniformed Division Officer by</p> <p>7 the name of Lewis Fox?</p> <p>8 A Yes.</p> <p>9 Q Tell the grand jurors how you know Mr. Fox?</p> <p>10 A I did not know him by name until the interview on</p> <p>11 television. I recall that he lives in Pittsburgh and that he</p> <p>12 was interviewed.</p> <p>13 Q When you say the interview on television, was this</p> <p>14 an interview in regard to the Monica Lewinsky case?</p> <p>15 A Yes, it was.</p> <p>16 Q When you saw Mr. Fox give an interview with regard</p> <p>17 to the Ms. Lewinsky case, did you recognize him?</p> <p>18 A Yes, having seen him numerous times at the White</p> <p>19 House.</p> <p>20 Q All right. By the time of the interview, he had</p> <p>21 retired. Do you recall that?</p> <p>22 A From the interview, not that I knew that.</p> <p>23 Q All right, but you learned that during the</p> <p>24 interview?</p> <p>25 A Yes.</p>

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1 Q Seeing the interview on TV.  
 2 A Correct.  
 3 Q As a result of seeing Mr. Fox on TV, did you ever  
 4 recall a time where you saw Ms. Lewinsky in the West Wing on  
 5 an occasion when Mr. Fox was on duty?  
 6 A No, I do not recall Mr. Fox being there on that  
 7 occasion.  
 8 Q Did you ever tell any of your superiors at the  
 9 Secret Service after seeing Officer Fox's interview something  
 10 to the effect of, "I saw that interview and I think I was  
 11 there that day."  
 12 A Yes, I did.  
 13 Q All right. Explain that to the grand jury, please.  
 14 A When I saw, when I saw Mr. Fox interviewed and  
 15 heard what he allegedly stated, that is what brought back the  
 16 memory of allowing Ms. Lewinsky in on one occasion.  
 17 Q Okay.  
 18 A And I went to my supervisor, Larry Cockle, and I  
 19 said, "I don't know if this is the same exact day, because I  
 20 don't know if it occurred several times or not, but I do  
 21 recall on one occasion I allowed Ms. Lewinsky into the Oval  
 22 Office."  
 23 Q Okay.  
 24 A "And I do not know if Mr. Fox was working that  
 25 particular day."

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1 Q All right. That's what I want to get at. Let me  
 2 back up and ask that in a little more detail. Give the basic  
 3 gist of what you saw Mr. Fox say to the ladies and gentlemen  
 4 of the grand jury, if you would.  
 5 A That it was somewhat surprising to me. And I think  
 6 he indicated that he allowed Ms. Lewinsky into the Oval  
 7 Office and [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]. So when he said that, it  
 12 startled me and I said, "Wait a minute. I remember doing  
 13 that once."  
 14 The fact that he said something that didn't sound  
 15 normal to me is what caused me to remember that I had allowed  
 16 her in on one occasion.  
 17 Q And that's not sounding normal because once the  
 18 President arrives in the Oval Office, [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 A That's correct.  
 24 Q All right. Is it your testimony that hearing  
 25 Fox's story on TV triggered this weekend or holiday or

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1 government shutdown event you've discussed where you [REDACTED]  
 2 [REDACTED] let Ms. Lewinsky in?  
 3 A That is correct.  
 4 Q Did it trigger a recollection of Lou Fox in any  
 5 way?  
 6 A No, it did not.  
 7 Q And it caused you to go to Special Agent in Charge  
 8 Cockle.  
 9 A Yes, sir.  
 10 Q And what did you tell Special Agent in Charge  
 11 Cockle?  
 12 A Exactly, exactly what I said here. I said, "I  
 13 remembered an occasion where Ms. Lewinsky came to the door  
 14 with some documents and I allowed her into the Oval Office."  
 15 Q What did Mr. Cockle tell you to do?  
 16 A He asked me if I had witnessed any type of  
 17 inappropriate behavior or anything to that effect. I said,  
 18 "No, sir. The door was closed and I departed shortly after  
 19 that when I was pushed."  
 20 Q Did he advise you what to do beyond that?  
 21 A No, sir.  
 22 Q All right.  
 23 A As long as I hadn't witnessed anything illegal or  
 24 inappropriate.  
 25 Q Now with the incident that you've described, the

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1 holiday or government shutdown or weekend incident, do you  
 2 recall Lou Fox being in the White House in any location  
 3 during any part of that day?  
 4 A No, I don't -- I don't have any recollection of  
 5 that.  
 6 Q Does Lou Fox -- do you recall Lou Fox being present  
 7 during any of the other times you've told us about where you  
 8 saw Monica Lewinsky, whether it was just walking around the  
 9 White House, the time this November or December '97 you saw  
 10 her or the trip to the Pentagon?  
 11 A No, sir.  
 12 Q Is it possible that Lou Fox was the Uniformed  
 13 Division officer on duty during the [REDACTED] incident that you've  
 14 described?  
 15 A Sure.  
 16 Q Is it possible he was not the Uniformed Division  
 17 officer on duty?  
 18 A Yes, it is possible.  
 19 Q I want to ask you next, Special Agent Garabito,  
 20 about some of the other posts. If Ms. Lewinsky had the type  
 21 of pass that you described earlier, that is an intern or  
 22 staffer pass, to your knowledge, would that prohibit her from  
 23 entering certain gates or entrances to the complex? Or would  
 24 she otherwise be limited to certain entrances to the complex?  
 25 A I am not fully aware of what the restrictions are.

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1 I think the Uniformed Division officers have much more  
 2 specific guidelines to that. We are so concerned with who's  
 3 around the President that we don't -- I don't know if that  
 4 pass allows you this access, that access. We're just  
 5 concerned if anyone approaching him.  
 6 Q And as a practical matter as a PPD, you don't work  
 7 a gate anyway; is that correct?  
 8 A That is correct.  
 9 Q Have you heard of an entrance or a gate designated  
 10 ACB?  
 11 A No, sir.  
 12 Q How about a gate or an entrance [REDACTED]?  
 13 A No, sir.  
 14 Q [REDACTED]  
 15 A No, sir.  
 16 Q Special Agent Garabito, I'm going to ask you to  
 17 step outside the grand jury room for a moment or two and  
 18 we'll be with you in a few moments.  
 19 (Witness was excused. Witness was recalled.)  
 20 THE FOREPERSON: Mr. Garabito, you understand you  
 21 are still under oath?  
 22 THE WITNESS: Yes, ma'am.  
 23 THE FOREPERSON: Thank you.  
 24 BY MR. SUSANIN:  
 25 Q Special Agent Garabito, a few follow-up questions

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1 for you from the grand jurors. First, with regard to the  
 2 incident you talked about where you let Ms. Lewinsky in  
 3 [REDACTED] on this holiday or weekend or government shutdown  
 4 date, do you recall who you relieved [REDACTED] when  
 5 you arrived there?  
 6 A No, sir.  
 7 Q Do you recall whether it was a Uniformed Division  
 8 officer or a PPD agent?  
 9 A I would say it was another agent because if it  
 10 would have been an officer it would have meant that I would  
 11 have walked from the residence to the Oval Office part in  
 12 order to push him to the next post, and I don't recall that.  
 13 So my assumption would be it was another agent.  
 14 Q I might have asked you this earlier and I forgot  
 15 just as a follow-up to that question. Do you recall that the  
 16 President was already in the Oval Office when you arrived on  
 17 the shift?  
 18 A Yes, that is correct.  
 19 Q So is it fair to say you are assuming since there  
 20 was a PPD person to relieve -- let me ask you that a  
 21 different way. Strike that.  
 22 So is it fair to say you're assuming since the  
 23 President was already in the Oval Office and you didn't  
 24 accompany him to the Oval Office there was already a PPD  
 25 person to relieve?

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1 A That is correct.  
 2 Q But do you have a specific recollection one way or  
 3 the other, that assumption aside?  
 4 A No, sir.  
 5 Q Secondly, do you remember when the government  
 6 shutdown was?  
 7 A I feel ashamed, but I don't.  
 8 Q Do you remember a year or a month, time of year?  
 9 A I want to say '96, towards the time when they have  
 10 to do the budget which is September/October, you know.  
 11 August maybe.  
 12 Q Let me ask you with regard to your testimony that  
 13 you would see Ms. Lewinsky walking, say, from the East Wing  
 14 through the residence to the West Wing or around the  
 15 colonnade, was it unusual to have someone of her level  
 16 walking, say, through the White House or through the Press  
 17 area or through the colonnade to go back and forth?  
 18 A No, sir. The areas that I have indicated she  
 19 walked through are areas that all staff people, all interns  
 20 would have to walk through. That's the way to get from one  
 21 side to the other.  
 22 Q Let me ask you a follow-up based on that. When you  
 23 actually used the word, "residence," when you say someone is  
 24 going from the East Wing through the residence to the West  
 25 Wing, is it a public part of the residence they're walking

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1 through or are they walking through the Clintons' residence?  
 2 In other words, are they walking through the private  
 3 quarters, the living room, their dining room, that part of  
 4 the residence?  
 5 A No, sir. It's totally the public area. It is the  
 6 only way to get from one side to the other. Everybody takes  
 7 that route.  
 8 Q But it is still called the residence?  
 9 A Well, I'm using that terminology so that you know  
 10 what part of the building it is.  
 11 Q So is "residence" used to describe the main White  
 12 House in that context you're using it?  
 13 A That's the terminology we would use. Officially, I  
 14 think the residence begins on the second floor above the  
 15 State Floor and the State Floor and the ground floor, which  
 16 is what I'm referring to, the ground floor of the residence  
 17 is a very public area. That's what everyone has to walk  
 18 through.  
 19 Q You would see Ms. Lewinsky on the ground floor?  
 20 A Yes.  
 21 Q And the State Floor above that is also public?  
 22 A But I don't, I don't ever recall seeing her there.  
 23 Q And then the two floors above that start the  
 24 residence?  
 25 A Considered the private part of the residence, yes.

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1 Q And is the ground floor taken up to the State Floor  
 2 by tourists?  
 3 A Yes.  
 4 Q And when you get to the State Floor, is that the  
 5 bulk of the tour? That's where you see the dining room and  
 6 the State Room and the Red Room and the Blue Room and all  
 7 that?  
 8 A That is correct.  
 9 Q Another question for a grand juror, on the  
 10 occasion where you saw Mrs. Currie leading someone out that  
 11 may or may not have been Ms. Lewinsky, was Mrs. Currie's door  
 12 locked?  
 13 A I do not recall. I would say no, but I do not  
 14 recall. That was I think a regular working day, so I would  
 15 say no, it was not locked. It was opened.  
 16 Q And what makes you think it was a regular working  
 17 day?  
 18 A Just because of the whole -- the day where I  
 19 allowed Ms. Lewinsky into the office stands out as an  
 20 abnormal day; whereas, this other day was just a normal day.  
 21 Q How was the amount of traffic in the West Wing?  
 22 A Normal, you know, people going back and forth.  
 23 Q Do you recall whether you saw Mrs. Currie before  
 24 the incident where Mrs. Currie and someone you say might have  
 25 been Ms. Lewinsky came out of the pantry door?

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1 A No, I don't think so. I don't remember it  
 2 actually, but I don't think so.  
 3 Q You don't think that you saw her earlier?  
 4 A Correct.  
 5 Q Do you know if you saw her after that incident?  
 6 A Yes. She returned from down in that direction  
 7 somewhere, from the Chief of Staff's direction, she returned  
 8 this way.  
 9 Q How much later --  
 10 A See, there you go. The door was opened because she  
 11 returned from that section, walked by me and went into her  
 12 office. Yeah, it was open.  
 13 Q All right. How much time went by from the time you  
 14 saw her leave with the woman until you saw Mrs. Currie  
 15 coming back?  
 16 A A short period of time, 2-3 minutes.  
 17 Q And she walked back to her office, so her office  
 18 was unlocked.  
 19 A Yes.  
 20 Q And the last question I have for you, when you say  
 21 you saw the woman with short dark hair walking out of the  
 22 pantry with Mrs. Currie, can you show us what length you mean  
 23 when you use the word, "short."  
 24 A About here. (Indicating.) Neck line.  
 25 Q Okay.

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1 A Not on the shoulders. Right about there.  
 2 Q Okay. So, for the record, Special Agent Garabito  
 3 is pointing to his suit collar, right under the shirt collar.  
 4 Help me out here. What else is he doing.  
 5 A JUROR: Shoulder length.  
 6 THE WITNESS: Shoulder length to me means this.  
 7 (Indicating.)  
 8 MR. SUSANIN: You can all tell somebody in my boat  
 9 doesn't need to worry about a description of hair.  
 10 (Laughter.)  
 11 MR. SUSANIN: Thank you very much. Thank you for  
 12 the help.  
 13 Special Agent Garabito, I'm going to ask you to  
 14 step outside for another moment, sir.  
 15 (The witness was excused at 11:38 a.m.)  
 16 (Whereupon, the taking of the testimony before a  
 17 full quorum of the Grand Jury was concluded at 11:38 a. m.)  
 18 \* \* \* \* \*  
 19 MR. SUSANIN:  
 20 A JUROR: Shoulder length.

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1 (The witness was excused at 10:06 a.m.)  
 2 (Whereupon, the taking of the testimony before a  
 3 full quorum of the Grand Jury was concluded at 10:06 a.m.)  
 4 \* \* \* \* \*  
 5



## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/2/98

PETER A. GEORGESCU, Chairman and Chief Executive Officer, YOUNG and RUBICAM, INC. (YRI), 285 Madison Avenue, New York, NY, was made available for interview by his attorneys, MARK T. McENROE and MARK DILLER, Legal Counsels for YRI, telephone number (212) 210-3427. McENROE and DILLER were present during the interview which was arranged to take place at the Millinium Hotel. All persons present were advised of the purpose of the interview and the official identity of OIC Investigator [REDACTED] and FBI Special Agent [REDACTED]. GEORGESCU thereafter provided the following information:

A few days before December 11, 1997 Georgescu recalls receiving a telephone call from "an old friend and business acquaintance since 1979" VERNON JORDAN who asked that he take a look at a "young person from the WHITE HOUSE" for possible work in the New York area. GEORGESCU responded that "we'll take a look at her in the usual way". GEORGESCU explained that both he and JORDAN knows that the "usual way" means that if we have an opening that she can qualify for. The conversation was only a few minutes in length and JORDAN closed the telephone call with a committment to send her resume to his office.

A resume with a cover letter and fax sheet was recieved at GEORGESCU's office on December 11, 1997. GEORGESCU saw these documents on December 12, 1997 and wrote on the fax transmittal page the following note to TOM BELL, president of BURSON-MARSTELLER, a division of YRI:

"Dear Tom,  
Our good pal called personally to ask us to look with care at this young lady. I know it would mean lots if we can help. Could you arrange for her to meet the right people. Let me know what they think. Thanks, Peter"

Near the bottom of the page GEORGESCU wrote the following note:

"P.S. I'll have JANE follow up with RHONDA to see who MONICA should see in N.Y."

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Investigation on 1/29/98 at New York City, NY File # 29D-LR-35063  
 by [REDACTED] [REDACTED] Date dictated 2/2/97

29D-LR-35063

Continuation of OIC-302 of Peter A. Georgescu, On 1/29/98, Page 2

Some time before January 21, 1997 GEORGESCU remembers that he happened to think about the referral from JORDAN and so he rechecked with BELL to see if she had been interviewed by BURSON-MARSTELLER. BELL replied that LEWINSKY had been interviewed.

A short time following the newspaper stories about the President and LEWINSKY (approximately January 21, 1997) GEORGESCU learned for the first time from an unrecalled company associate that LEWINSKY was not offered a job with BURSON-MARSTELLER.

GEORGESCU remembers on the day of VERNON JORDAN's press conference about his part in the job search for MONICA LEWINSKY, he received a telephone call from JORDAN at about 2:00 pm which was about 1 hour before the press conference. JORDAN informed GEORGESCU that he was going to hold a press conference and he was simply giving GEORGESCU advance notice. JORDAN explained that he was going to tell about his involvement and he wanted to do it soon. JORDAN's main concern seemed to be that GEORGESCU had prior warning that he would mention YRI in his press release. GEORGESCU remembers it being a short phone call and he did not see the press conference.

GEORGESCU is described as follows from observation and interview:

Name: [REDACTED]  
Sex: [REDACTED]  
Race: [REDACTED]  
DOB: [REDACTED]  
SSAN: [REDACTED]  
Home Address: [REDACTED]  
Home Telephone: [REDACTED]  
Business Telephone: [REDACTED]  
Business FAX: [REDACTED]

## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 3/26/98

PETER A. GEORGESCU, Chief Executive Officer, YOUNG & RUBICAM (Y&R), New York, New York, telephone number [REDACTED], was interviewed telephonically at his place of business. Also present in New York during the conversation was MARK DILLER, a corporate attorney for Y&R. Present in Washington at the time of interview was THOMAS BIENERT, Assistant Independent Counsel, Office of Independent Counsel. Y&R is an advertising company.

At the outset, it was re-affirmed that Y&R was not a target of investigation. It was also stated that this interview was a follow-up to GEORGESCU's earlier interview for the purpose of clarification and coverage of additional issues.

GEORGESCU and VERNON JORDAN have been friends and business associates for about twenty years. They originally met in Chicago. JORDAN has no formal connection to Y&R or any of its subsidiary companies. JORDAN may have done some work for Y&R in the past, however GEORGESCU has no knowledge of it.

Y&R's subsidiary companies are:

BURSON MARSTELLER (B-M)  
WONDERMAN, VITO & JOHNSON  
LONDON & ASSOCIATES  
STODLER & HENNESSEY  
BRAVO  
COHN & WOLFE  
CHAPLAIN

These companies have varying interests such as public relations, advertising, and direct marketing.

During the calendar year ending with December 1997, GEORGESCU saw VERNON JORDAN in person one or two times.

In 1997, GEORGESCU had only one telephone conversation with VERNON JORDAN which occurred in December, exact date not recalled. The topic of the conversation was singular in nature with only one apparent motivation. JORDAN called GEORGESCU at

(telephonically)

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Investigation on 3/25/98 at New York, New York File # 29D-OIC-LR-35063  
by [REDACTED] Date dictated 3/26/98

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29D-OIC-LR-35063

Continuation of OIC-302 of PETER A. GEORGESCU, On 3/25/98, Page 2

his office to ask if they (Y&R) would take a look at a certain young woman for the purpose of ~~potential~~ employment with one of their companies. He asked if they **would provide** her with an employment interview. JORDAN suggested that her experience might fit well with B-M, a public relations company. JORDAN mentioned that this request would be in accordance with "the usual conditions." This meant that GEORGESCU would arrange to initiate the employment interview process, but from there on **GEORGESCU's** involvement would be from arm's length. The interviewee would be on their own from that point.

JORDAN said that GEORGESCU would shortly receive a facsimile communication from the person in question, MONICA LEWINSKY. During this conversation JORDAN did not characterize **LEWINSKY's** qualifications other than to mention that she was a young person. JORDAN did not engage in a "sales pitch" about LEWINSKY. GEORGESCU inferred that LEWINSKY would be qualified for an entry level position. JORDAN's remarks gave no indication as to whether the favor was on behalf of any other person. GEORGESCU could not recall if there was a White House connection mentioned during the conversation with JORDAN. He took no notes during their discussion.

GEORGESCU recalled that JORDAN made a similar request to Y&R on a previous occasion more than five or six years ago. He was unsure; however, it was possible JORDAN made a request in the past for more than one person. GEORGESCU could not recall the level of experience of the last recommended person. In addition to these instances, JORDAN and GEORGESCU have exchanged opinions of several people in the industry on an informal basis.

Soon after the telephone call, GEORGESCU's office received a fax from **LEWINSKY** consisting of a Department of Defense cover page, a letter to GEORGESCU, and a resume. Upon receiving it, he read through the document.

GEORGESCU referred the matter of LEWINSKY to TOM BELL, Chief Executive Officer (CEO), B-M, a public relations firm. He did this because he recalled JORDAN mentioning public relations as a possible area of employment. JORDAN may have specifically mentioned B-M; however, GEORGESCU was unsure of this point. GEORGESCU pointed out that as a matter of practice, if he were

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Continuation of OK-302 of PETER A. GEORGESCU, On 3/25/98, Page 3

recommending someone to B-M, even at the entry level, he would make the initial contact with TOM BELL.

Regarding GEORGESCU's handwritten notes on the Department of Defense facsimile cover sheet received by Y&R from LEWINSKY, he said the following:

The phrase "our good pal" is a reference to JORDAN which BELL would understand, not only because of JORDAN's familiarity with the company, but the attached documents contained his name. GEORGESCU added that he attached significance to the request from JORDAN because he had not spoken with JORDAN on the telephone on any matter for approximately one year. The referral obviously meant a lot to JORDAN. The term "meet the right people" indicated that she should get an interview. BELL would decide what would be done from that point.

The mention of the name JANE is a reference to GEORGESCU's secretary, JANE TRESE. RHONDA is a reference to BELL's assistant. The initials PAG refers to PETER A. GEORGESCU.

The note on the side of the page is probably BELL's handwriting. The note in the middle of the page may be the writing of PATTY FOX, BELL's assistant.

GEORGESCU did not make any other notes about this matter and had no further involvement. Between December 12, 1997 and the follow-up call from JORDAN, GEORGESCU received no other feedback on LEWINSKY. In addition, he did not receive any other communication from LEWINSKY. JORDAN'S December telephone call to GEORGESCU was made to [REDACTED] or [REDACTED], which are his office telephone numbers. His secretary's telephone number is [REDACTED].

GEORGESCU initiated one inquiry about LEWINSKY after his first referral to BELL. At some point prior to January 21, 1998, he had his secretary call someone (exact person not recalled) about the matter. He did not recall what prompted *him* to do this, but he believed he may have seen some written reference to LEWINSKY. He learned, as a result, that LEWINSKY had been interviewed; however, he did not hear about any assessment of her. GEORGESCU believed that his obligation to

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JORDAN was fulfilled. He made no effort to inform JORDAN of what had happened or the status of LEWINSKY's employment prospects.

GEORGESCU had no further dealings with the matter until receiving a telephone call from JORDAN a couple hours before his (JORDAN's) statement to the press on or about January 21, 1998. In this call, JORDAN said he wanted GEORGESCU to know about his impending comments. He said he planned to announce that he had asked three organizations, including Y&R, to interview LEWINSKY. While GEORGESCU was on the telephone with JORDAN, he recalled that he had seen news stories about the LEWINSKY matter; however, he had not, until that moment, connected the news reports to the request from JORDAN.

GEORGESCU did not ask JORDAN any questions about the matter of the LEWINSKY referral. The issue as to why the request was made seemed to be self-evident. GEORGESCU neither made nor received any calls from JORDAN about this subject after the news became public.

Since approximately January 21, 1998, GEORGESCU has seen JORDAN on one occasion. This occurred at the end of January, when they were present at the same economic forum in Davos, Switzerland. He did not recall any references to LEWINSKY during that encounter.

At no time did JORDAN offer any explanation as to how he got involved with LEWINSKY.

GEORGESCU has had no contact with any attorneys connected with CLINTON about LEWINSKY or JORDAN.

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## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1 / 7 7 / 9 8

LUCY GOLDBERG, [REDACTED] [REDACTED]  
[REDACTED] was served with a Grand  
Jury subpoena, issued in the United States District Court, 401  
Courthouse Square, Alexandria, Virginia. The subpoena which was  
addressed to GOLDBERG requested her appearance before the Grand  
Jury and documents referring or relating to LINDA TRIPP and  
MONICA LEWINSKY.

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Investigation on 1/22/98 at New York, New York

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File # 29D-IR-35063 -1093 Date dictated 1/22/98

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by [REDACTED]

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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 07/17/98

LUCIANNE STEINBERGER GOLDBERG, white, female, date of birth April [REDACTED] place of birth [REDACTED] Social Security Account Number unknown. Corporate Identification number [REDACTED], [REDACTED], [REDACTED], home telephone number [REDACTED] sole proprietor LUCIANNE S. GOLDBERG LITERARY AGENTS, Incorporated, telephone number [REDACTED], was interviewed at the New York office of the Federal Bureau of Investigation, 26 Federal Plaza, New York, New York, 10278. Also present for the interview was Associate Independent Counsel (AIC) STEPHEN BINHAK. GOLDBERG was apprised of the official identities of the interviewers and the nature of the interview and thereafter provided the following information:

GOLDBERG advised that in the Summer of 1996, she was introduced to LINDA TRIPP. GOLDBERG and TRIPP share TONY SNOW as a mutual friend. SNOW contacted GOLDBERG and said he had a friend interested in doing a book. TRIPP talked with GOLDBERG and explained she was interested in writing a book on her experiences working in the BUSH and CLINTON White Houses. GOLDBERG and TRIPP arranged a meeting sometime later in the Summer of 1996.

GOLDBERG and TRIPP met in the Washington, DC home of GOLDBERG's son, JONAH GOLDBERG, who was present for the meeting, which lasted a couple of hours. TRIPP brought some documents and notes to the meeting to provide a snap-shot of TRIPP's experience at the White House, which gave GOLDBERG an idea that TRIPP knew what she was talking about. TRIPP did not have any official White House documents at this meeting.

GOLDBERG suggested TRIPP procure a ghost-writer for the project. GOLDBERG got the idea that TRIPP thought the CLINTON administration was unusual and she wanted to write about it. TRIPP indicated she liked the style of the BUSH White House, but did not like the style of the CLINTON White House. GOLDBERG advised that TRIPP did not provide a warm and fuzzy portrait of the CLINTON administration.

GOLDBERG did not initially have a specific ghost-writer in mind, so she called around to other agencies and was provided the name MAGGIE GALLAGHER. TRIPP knew the way the ghost-writer

Investigation on 07/17/98 at New York, New York File # 29D-OIC-LR-35063

by [REDACTED] Date dictated 07/17/98

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Continuation of OIC-302 of LUCIANNE STEINBERGER GOLDBERG .On 07/17/98 .Page 2

" game " was played. Money was not discussed at this point. GALLAGHER was not going to charge **money to write the proposal**.

At that point, GOLDBERG and TRIPP informally kept in touch through a handful of phone calls. It took several weeks for GALLAGHER to finish the proposal, which she sent to GOLDBERG when it was completed. GOLDBERG thought it was interesting.

GOLDBERG submitted the proposal to **LIZA** DAWSON, a friend of GOLDBERG's who works at PUTNAM, a New York publishing house. DAWSON said the management at PUTNAM was too liberal to touch such a product. Only two pages referred to women in the White House who were involved sexually with President WILLIAM JEFFERSON CLINTON. One of the women was KATHLEEN WILLEY, whose name was not revealed in the book and the other was DEBBIE SCHIFF, whose name was revealed in the book.

GOLDBERG advised the book was about the Travel Office matter, "**Filegate**" and other things going on in the White House Counsel's Office.

GOLDBERG advised that before she could submit the proposal to other publishing houses, TRIPP called and she had changed her mind and she did not want to write the book. TRIPP advised that she thought publishing such a book was too big a risk and TRIPP was afraid she would lose her job. GOLDBERG advised that money was not discussed with TRIPP, no "**ballpark**" figures were given. GOLDBERG advised she typically does not mention dollar amounts because she does not like to promise what she can not deliver.

GOLDBERG advised that TRIPP was not thrilled with GALLAGHER's product. GOLDBERG sensed that TRIPP and GALLAGHER did not get along personally. TRIPP called the project off in the Fall of 1996. GOLDBERG advised the TRIPP project was not a priority item in GOLDBERG's business. TRIPP was very apologetic for calling the project off. TRIPP felt as if she wasted GOLDBERG's time. GOLDBERG advised TRIPP was a "**straight arrow**" who was embarrassed for dropping the project.

GOLDBERG had no contact with TRIPP until fourteen months later. In August of 1997, GOLDBERG traveled to Russia. Upon returning, GOLDBERG had a message from TONY SNOW, who said that TRIPP would like to get back in touch with GOLDBERG. GOLDBERG recalls the time frame as late August or early September when she contacted TRIPP.

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Continuation of OK-302 of LUCIANNE STEINBERGER GOLDBERG .On 07/17/98 .Page 3

GOLDBERG assumed TRIPP was interested in renewing the book deal. When GOLDBERG spoke with TRIPP, TRIPP indicated she had found herself in an extraordinary situation. TRIPP indicated that MIKE ISIKOFF, a reporter from Newsweek, showed up at her office, asking questions about KATHLEEN WILLEY. TRIPP indicated that ISIKOFF wanted to sit down with TRIPP to discuss a young woman that TRIPP was familiar with. TRIPP did not mention the woman's name during this telephone conversation with GOLDBERG. GOLDBERG believes that TRIPP wanted to discuss matters with a "wiser head" before agreeing to meet with ISIKOFF.

TRIPP provided just enough information for GOLDBERG to be interested in the story. According to TRIPP, TRIPP had been friends with a woman, who also worked at the Pentagon, who now found herself at a "critical juncture" because of the PAULA JONES lawsuit.

TRIPP was convinced she would be called to testify and that no one would believe her. TRIPP reminded GOLDBERG that CLINTON's attorney, ROBERT BENNETT, had already called TRIPP a liar. TRIPP told GOLDBERG that TRIPP pleaded with the young woman to tell CLINTON that TRIPP knew about their relationship. TRIPP felt this would cause CLINTON to settle the JONES case, freeing TRIPP from having to testify.

TRIPP advised that, if the information she had got out, it would be explosive. GOLDBERG suggested TRIPP go to a tabloid. TRIPP declined, indicating she felt that was "sleazy." TRIPP wanted the story to come out in Newsweek so her credibility could be protected. TRIPP knew she would not get any money if the story came out in Newsweek. GOLDBERG advised that there was no book deal mentioned during this time period.

GOLDBERG recalls three conversations with TRIPP during the Fall of 1997. The first was on either September 18th or 19th. GOLDBERG advised she recorded this telephone call. GOLDBERG cannot recall the date of the second conversation with TRIPP, but it was not recorded by GOLDBERG. GOLDBERG advised her third telephone call with TRIPP was on September 28th and it was recorded by GOLDBERG.

GOLDBERG advised she told TRIPP to tape the telephone conversations with the young woman from the Pentagon. TRIPP did not want to tape the calls as she thought it was "sleazy." GOLDBERG told TRIPP that the "machine" would destroy TRIPP unless TRIPP had irrevocable proof. TRIPP felt she was being betrayed by the young woman.

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TRIPP must have made the decision to record after the second conversation with GOLDBERG in September of 1997. GOLDBERG and TRIPP met in Washington, DC prior to TRIPP meeting with ISIKOFF. GOLDBERG was present to witness TRIPP's meeting. GOLDBERG suggested she and TRIPP meet at JONAH GOLDBERG's house. GOLDBERG feels her presence made TRIPP comfortable meeting with ISIKOFF.

TRIPP brought two audiotapes of telephone conversations with the young woman. TRIPP wanted JONAH GOLDBERG to duplicate the tapes. TRIPP gave the tapes to LUCIANNE GOLDBERG, who put them in her purse. GOLDBERG did not listen to the tapes until after the LEWINSKY story broke. GOLDBERG advised that TRIPP gave her the tapes twenty minutes before ISIKOFF was to show up, so there was no time to duplicate the tapes.

ISIKOFF showed up and began interviewing TRIPP. TRIPP told ISIKOFF of a Pentagon employee who was involved in a sexual relationship with CLINTON. TRIPP told ISIKOFF of numerous visits to the White House by this woman, love letters sent from the woman to CLINTON and other fairly specific information. TRIPP did not tell ISIKOFF the woman's name. GOLDBERG advised she did not know the woman's name at this time, either.

ISIKOFF sat stone-faced while TRIPP told her story. ISIKOFF told TRIPP he needed more information. TRIPP advised ISIKOFF of the tapes she had. ISIKOFF did not listen to the tapes. GOLDBERG advised this meeting was on a weeknight and ISIKOFF was rushing so that he could appear on a television show that night.

After meeting with ISIKOFF, TRIPP and the **GOLDBERGS** went to dinner at a Thai restaurant in Washington, DC. GOLDBERG advised that money was not discussed during this meeting.

After this meeting, TRIPP kept GOLDBERG apprised of her situation, as it related to the young woman. GOLDBERG soon learned the woman's first name was MONICA. TRIPP advised the situation was becoming more intense. TRIPP showed GOLDBERG some e-mails written by MONICA. GOLDBERG had no reason to doubt MONICA existed.

TRIPP did not play any tapes for GOLDBERG. TRIPP and GOLDBERG spoke daily, except when GOLDBERG traveled. TRIPP felt sorry for LEWINSKY. TRIPP also worried about **LEWINSKY's** mental health. TRIPP, LUCIANNE GOLDBERG and JONAH GOLDBERG were all angry at CLINTON for allowing the situation to continue.

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**GOLDBERG** advised she gave **TRIPP** no further suggestions regarding documentation. **TRIPP** advised that **MONICA** would complain about the cost of sending items via **FEDERAL EXPRESS**. **GOLDBERG** suggested **TRIPP** tell **MONICA** about **GOLDBERG**'s brother's courier service, because it was cheaper than **FEDERAL EXPRESS**. **GOLDBERG** made the remark in an off-handed way, with the only intention of steering some business to her brother.

In November, **TRIPP** called **GOLDBERG** in a panic, and said that someone from **PYKE's** office called. **GOLDBERG** told **TRIPP** that she would return the call on behalf of **TRIPP**. **GOLDBERG** told **PYKE** who she was, that she was calling on behalf of **TRIPP** and that **TRIPP** was afraid of being subpoenaed. **GOLDBERG** advised she did not call anyone anonymously. **PYKE** told **GOLDBERG** he was very interested in **TRIPP** and that **TRIPP** knew "**stuff.**" **PYKE** did not mention **KATHLEEN WILLEY**. **GOLDBERG** does not know if **TRIPP** then called **PYKE** or if **PYKE** then called **TRIPP**.

**GOLDBERG** did not have much contact with **TRIPP** during the holidays. **GOLDBERG** advised that a week prior to **TRIPP** going to Independent Counsel **KENNETH STARR**'s office, **TRIPP** took a tape mentioning **VERNON JORDAN** to **TRIPP's** attorney, **KIRBY BEHRE**. According to **TRIPP**, **BEHRE** went "ballistic," because **BEHRE** had told **TRIPP** to stop taping phone calls from her home in Maryland,, **BEHRE** said he was going to call **BENNETT** and get **BENNETT** to settle the **JONES** case. **TRIPP** said that **BEHRE** said she could go to jail.

**TRIPP** became very nervous and told **GOLDBERG** she needed a new attorney. **TRIPP** provided the prerequisites the attorney would have to meet to satisfy her. The attorney would have to work for free, take the job now and be based in Washington, DC.

In the meantime, because **TRIPP** was so nervous about being prosecuted under the Maryland wiretap laws, she wanted to go to the Office of the Independent Counsel (**OIC**) to get immunity for making the tapes. **GOLDBERG** called around to friends she has, including one in Chicago who works at the same firm **KEN STARR** does. This person recommended **GOLDBERG** call **JACKIE BENNETT** at the **OIC**. **GOLDBERG** advised that the **OIC** knew who this person is and that this person is very nervous at this time. **GOLDBERG** called **JACKIE BENNETT** sometime before **TRIPP** did.

**GOLDBERG** made telephone calls to attorneys in Washington, DC, New York, Los Angeles and Chicago. **GOLDBERG** eventually came up with **JIM MOODY**, and recommended him to **TRIPP**. After meeting with **TRIPP**, **MOODY** took a letter to **BEHRE**,

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Continuation of OIC-302 of LUCIANNE STEINBERGER GOLDBERG .on 07/17/98 . Page 6

indicating BEHRE was being dismissed by TRIPP and MOODY was now representing TRIPP. The letter was signed by TRIPP. BEHRE apparently said he needed seventy-two hours to finish typing transcripts to all the tapes,

TRIPP told GOLDBERG about her meeting with the OIC. TRIPP told GOLDBERG she was going to be "wired" to go into a lunch meeting with MONICA. After this lunch, TRIPP spoke with GOLDBERG and advised that everything went fine. After another meeting with the OIC that same week, TRIPP told GOLDBERG that the OIC said that TRIPP should not be talking to a press agent. At that point, TRIPP and GOLDBERG decided not to speak to each other.

GOLDBERG was recently contacted by TRIPP, the night before TRIPP's first grand jury appearance. TONY SNOW called GOLDBERG and said TRIPP wanted to talk to GOLDBERG. GOLDBERG advised the talk was mostly "girl-talk" and about the media. GOLDBERG has spoken to TRIPP approximately five or six times since, including the night before this interview. GOLDBERG advised that now the topic is mostly about the grand jury.

GOLDBERG advised that when she recently was quoted saying that LINDA TRIPP knew who prepared the "talking points," she was misquoted. GOLDBERG advised that she was on the show "Hardball," hosted by CHRIS MATTHEWS. Also appearing on the show was MATT DRUDGE. GOLDBERG said that she could not imagine that TRIPP does not know who prepared the talking points. When asked by MATTHEWS if she knew and if so, how she knew. When GOLDBERG did not answer, MATTHEWS filled in that GOLDBERG heard a tape. DRUDGE picked up on it and ran with the story the following day.

TRIPP gave GOLDBERG permission to say that LEWINSKY told TRIPP that CLINTON knew LEWINSKY would lie and that LEWINSKY said TRIPP should lie. Everything GOLDBERG said publicly was with the permission of TRIPP.

GOLDBERG said that TRIPP did not specifically mention tapes, except for one referring to JORDAN and the two she gave GOLDBERG. GOLDBERG assumes TRIPP was taping from October through January. GOLDBERG believes the tape referring to JORDAN was made in January.

GOLDBERG advised that she has been offered \$750,000 to sell the transcripts of the two tapes she made of conversations with TRIPP. GOLDBERG thinks all of TRIPP's tapes are worth approximately \$2 million.

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Steve Goodin, 2/17/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE  
PREPARED BY:

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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

In re:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 4 United States District Court for the District of Columbia 3rd & Constitution, N.W. Washington, D.C. 20001 Tuesday, February 17, 1998

The testimony of DAVID STEPHEN GOODIN was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 1:57 p.m., before: SOLOMON WISENBERG STEPHEN BINHAK MARY ANNE WIRTH Associate Independent Counsel Office of Independent Counsel 1001 Pennsylvania Avenue, Northwest Suite 490 North Washington, D.C. 20004

Whereupon,

DAVID STEPHEN GOODIN

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

EXAMINATION

BY MR. WISENBERG:

Q Good afternoon. Would you state and spell your name for the record, please, sir?

A Full name?

Q Sure.

A David Stephen Goodin, D-a-v-i-d S-1-e-p-h-e-n

G-o-o-d-i-n.

Q Mr. Goodin, my name is Sol Wisenberg. I'm with the Office of Independent Counsel. I'm here with my colleagues Stephen Binhak and Mary Anne Wirth, also attorneys with the Office of Independent Counsel, the members of the grand jury and the grand jury court reporter.

I'm going to before we begin tell you a little bit about the grand jury's authority and about your rights and responsibilities as a grand jury witness. Do you understand?

A Yes, I do.

Q Occasionally, I will ask you whether or not you understand certain things and we'll need an audible response,

a yes, a no, a maybe, as opposed to a shaking of the head, so that the court reporter can get it down.

A I understand.

Q This is a grand jury empaneled by a United States district judge here in the district conducting an investigation of possible violations of federal criminal laws involving possible perjury, obstruction of justice and subornation of perjury.

I'm going to read to you from a portion of the order from the U.S. Court of Appeals granting this grand jury its authority.

The Independent Counsel shall have jurisdiction and authority to investigate to the maximum extent authorized by the independent Counsel Reauthorization Act of 1994 whether Monica Lewinsky or others suborned perjury, obstructed justice, intimidated witnesses or otherwise violated federal law other than a Class B or C misdemeanor or infraction in dealing with witnesses, potential witnesses, attorneys or others concerning the civil case Jones v. Clinton.

Do you understand that I just read to you from the court's order?

A Yes, I do.

Q Let me tell you a little bit about your rights and responsibilities. You have what's called a privilege against

self-incrimination which means you may refuse to answer any question if a truthful answer to the question would tend to incriminate you. Do you understand that?

A- I do

Q Anything that you do say may be used against you before the grand jury or in a later legal proceeding. Do you understand that?

A I do

Q If you have retained counsel, he cannot sit in the grand jury room with you, but the grand jury will permit you a reasonable opportunity to step outside the grand jury room to consult with your counsel if you so desire. Do you understand that?

A I do

Q Are you represented here today, by counsel?

A Yes, I am.

Q And tell us who that might be.

A Mr. Rick Gripley.

Q All right. And are you involved in a joint defense agreement with any other individuals in relation to what we are doing here today?

A No, I am.

Q Let me tell you a little bit about grand jury secrecy. Myself, my colleagues, the court reporter and the grand jurors are all, with certain exceptions, well

recognized legal exceptions, we're all bound by an oath of secrecy about what goes on here at the grand jury. Do you understand that?

A I do understand that.

Q We can't go blab about it to the press, we can't go out on the courthouse steps and talk about it. You, on the other hand, are not bound by such an oath. You are free to talk about it to anybody you want to or to not talk about it, that's a matter between you and your attorney. Do you understand?

A Yes, I do.

Q I sad there are certain exceptions to our oath of secrecy and let me tell you what some of them are. This isn't exhaustive, it's just some examples.

One would be if there's any trial that ever results from this investigation and you were to be a witness in that trial and you were to say something different than what you say here today, somebody could stand up, one of the lawyers, and say, "Excuse me, I have a transcript of Mr. Goodin's grand jury testimony and he said something different there than what he's saying on the stand." Do you understand that?

A Yes, I do.

Q Another example would be we have FBI agents who helping us in this investigation. We're allowed to tell them about what goes on in the grand jury, but they're also

subject to grand jury secrecy. They can't go blab it. Do you understand that?

A Yes, I do.

Q Another example would be Independent Counsels. Under the law authorizing Independent Counsels, there are certain instances where the Independent Counsel makes a report to Congress, the Independent Counsel can reveal grand jury information but only if he or she gets a court order allowing him to do so. Do you understand that?

A Yes.

Q All right. There are three kinds of people who come before grand juries to give testimony: witnesses, subjects and targets. I'm giving you informal definitions here, but a target is somebody who the grand jury and the prosecutor feel it's more than likely that they're going to be indicted. Do you understand that?

A Yes, I do.

Q You are not a target. Do you understand that?

A Yes, I do.

Q A subject is somebody who's not a target, but the grand jury might have suspicions about him or her, the grand jury wants to hear their story. Do you understand that?

A Yes, I do.

Q You are not a subject. Do you understand that?

A Yes, I do.

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Q A witness is somebody who is coming in, who is giving testimony about a subject matter that a grand jury has a right to inquire about. Do you understand that?

A Yes, I do.

Q You are a witness. Do you understand that?

A Yes, I do.

Q You understand that we can't guarantee that you'll never be a target, we can't make that guarantee to any witness? Do you understand that?

A Yes, I do.

Q Your status now based on what we know, based on what we know, is a witness. Do you understand?

A Yes I do.

Q You're here pursuant to a subpoena. Is that correct?

A That's correct.

Q Did that subpoena call just for your person or did it call for any documents?

A I don't believe that it called for any documents.

Q Let me ask you whether or not you understand that you cannot lie to us here today. Do you understand that?

A I do understand that.

Q If you lie about a material matter, that's against the law and that's perjury and that's prosecutable. Do you

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understand that?

A Yes, I do.

Q Also this is very important. Everything I've read here is important, but if there's any question that it is not clear to you, that you just don't understand, we need you to ask us to repeat it so that there's no question about that. Do you understand that?

A Yes, I do.

Q All right. Is there anything about our authority or about your rights and responsibilities as a grand jury witness that you don't understand?

A No, I understand all that you've said.

Q All right. Remember, if you need at any point to go and speak with your attorney, we'll allow you a reasonable opportunity to do so.

A Okay.

MR. WISENBERG: With that, I will hand over the questioning to Mr. Binhak.

MR. BINHAK: All right. And before I start, let me just ask the grand jury forewoman, do we have a quorum?

THE FOREPERSON: Yes we do.

MR. BINHAK: And are there any unauthorized people in the room?

THE FOREPERSON: No, there are not.

MR. BINHAK: Thank you.

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BY MR. BINHAK:

Q Mr. Goodin, why don't you start out by telling the grand jury how old you are and where you were born.

A [REDACTED]

Q And just give the grand jury a brief background of where you went to school.

A College? High school?

Q Start with high school and work your way up.

A I grew up in Gainesville, Texas, so I attended Gainesville high school, public school, in Gainesville, Texas. And then after that I went on to the University of Texas at Arlington and from there I went to the University of Texas at Austin, where I graduated with a Bachelor's degree.

Q And what did you study at Austin?

A Psychology.

Q Okay. After you graduated from UT Austin did you come straight to Washington, or did you stop any place along the way?

A I lived in Austin for approximately a year after I graduated and then after that year, I moved from Austin to Washington.

Q What were you doing while you lived in Austin for that year?

A I was bartending and waiting tables at a

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restaurant.

Q And when you moved to Washington what did you do when you got up here?

A When I moved to Washington, I took two jobs, waiting tables, and served a number of internships on the Hill.

Q Okay. Who did you work for on the Hill?

A Martin Frost and the Democratic Congressional Campaign Committee.

Q And what did you do in those internships basically?

A Pretty standard fare. Copying. I worked with the office manager in Congressman Frosts office and so I would do projects for him or for the congressman AA.

Q And once you were finished with your internships, I guess there were two of them, what happened next? Where did you go next?

A Well, they were simultaneous. After my internships, I moved to Manchester, New Hampshire and I joined the Clinton for President campaign.

Q And you worked in New Hampshire?

A Worked in New Hampshire.

Q What was your job on the Clinton campaign for New Hampshire?

A During the New Hampshire primary. I was the deputy scheduler for the state campaign office.

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Q And how long did that last?

A That lasted from December of 91 through the primary date, February of 92.

Q After the primary, did you stay with the Clinton campaign?

A Yes, I did.

Q What did you do at the campaign?

A I did some work in Florida for a couple of weeks and then I moved to Little Rock, Arkansas and joined the headquarters office staff.

Q And you stayed there until the end of the campaign?

A I stayed based out of Little Rock. I stayed permanently in Little Rock through the primary season, which was essentially through July, and then in August I began traveling and doing work in various cities based out of Little Rock.

Q And what kind of work was that?

A Advance work.

Q When you were in Little Rock, were you based in any sort of section in the campaign?

A In the scheduling advance office.

Q Okay. And did you do scheduling through the end of the election, I would think?

A I did advance work through the end of the election.

Yes.

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Q Okay. And did you have any place during the transition, with the Clinton transition team?

A Yes, I did. I was part of the transition advance team which was a group of people based in Little Rock, Arkansas.

Q Okay. And after the transition, did you come back to Washington?

A Yes.

Q Okay. Were you offered a job in the White House or in the administration?

A I was offered a job that I did not take in the White House.

Q Which one was that?

A A job as a staff assistant in the advance office.

Q And did you take another job instead?

A Yes, I did.

Q Why don't you tell the grand jury what that was?

A Well, it wasn't simultaneous to that job offer, but shortly thereafter, I took a job with the Democratic National Committee.

Q All right. And what did you do at the DNC?

A David Wilhelm, who was at that time the chairman of the DNC. I was his special assistant.

Q And what kind of things would you do for Mr. Wilhelm?

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OIC-Starr

## Page 14

[1] A I traveled within, I oversaw the logistics of his  
 [2] schedule and his events, his public appearances and speeches.  
 [3] Q How long did you work for him?  
 [4] A Worked for him in that job for approximately a  
 [5] year and then I moved to another job at the DNC.  
 [6] Q And which job was that?  
 [7] A I moved to the finance department, where I was the  
 [8] chief of staff for the finance department.  
 [9] Q And what did you do as the chief of staff in the  
 [10] finance department?  
 [11] A I was responsible for kind of all of the political  
 [12] and administrative aspects of the work that was done in that  
 [13] department, budgeting, coordinating with our political  
 [14] affairs office on cities where we had events and managing the  
 [15] staff and the expenditures of the staff of the department.  
 [16] Q How long did you stay with that job?  
 [17] A Again, approximately a year.  
 [18] Q And what was next?  
 [19] A And then in October of 1994, I joined the White  
 [20] House staff as the President's aide.  
 [21] Q Okay. And did you interview for that job? How did  
 [22] that come about?  
 [23] A I did interview for that job. I was interviewed by  
 [24] Erskine Bowles. Prior to that, I had done some advance work  
 [25] for the White House in my capacity as a DNC employee, as a

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[1] volunteer, and other things that I had done. I had  
 [2] substituted for the gentleman who was then the President's  
 [3] aide when he was out of town on at least one, but maybe more  
 [4] occasions. I filled in for him on a temporary basis.  
 [5] Q And did you have any other -- well, let me ask this  
 [6] this way. Are you still the President's aide?  
 [7] A No.  
 [8] Q Okay. So when did you stop being the President's  
 [9] aide?  
 [10] A At the beginning of December of this past year.  
 [11] December of 97.  
 [12] Q Did you have any other jobs at the White House  
 [13] between October 94 and December 97?  
 [14] A No.  
 [15] Q Okay. So you were always -- for the time that you  
 [16] worked at the White House, you were always the President's  
 [17] aide.  
 [18] A That's correct.  
 [19] Q Okay. What does the President's aide do?  
 [20] A Well, the President's aide. I guess, helps  
 [21] implement the President's daily schedule and helps ensure  
 [22] that the President has whatever materials may be necessary to  
 [23] perform his job.  
 [24] Q Do you have any input in creating the schedule?  
 [25] A No. It's pretty much presented as a final product

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[1] with the aide having the responsibility of implementing it.  
 [2] On occasion, someone in the scheduling office who would put  
 [3] together that schedule might ask for your opinion on how to  
 [4] structure an event or something like that based on your  
 [5] experience.  
 [6] Q Okay. But mostly kind of guide the President  
 [7] through his day. Is that correct?  
 [8] A That's correct.  
 [9] Q Kept him on schedule?  
 [10] A Attempted to, yes.  
 [11] Q Made sure he was at the right place at the right  
 [12] time?  
 [13] A Yes.  
 [14] Q With the right -- if he needed whatever anything  
 [15] from a pad to props or whatever charts. That's your job.  
 [16] A Exactly.  
 [17] Q Okay. You said that you tried your best. Is the  
 [18] President a difficult person to move along from a meeting?  
 [19] A He can be difficult to move from meeting to  
 [20] meeting. Yes.  
 [21] MR. BINHAK: Okay. I'll show you what's marked as  
 [22] DG-1. DG obviously are your initials. And it's here is a  
 [23] floor plan of the West Wing of the White House.  
 [24] (Grand Jury Exhibit DG-1 was  
 [25] marked for identification.)

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[1] BY MR. BINHAK:  
 [2] Q And what I would like you to do is use this pen and  
 [3] I would like you to illustrate two things, illustrate the  
 [4] answers to these questions. First, did you have a particular  
 [5] work area that you were assigned to within the White House?  
 [6] A The answer is yes and, in fact, I had two  
 [7] particular work areas assigned to me.  
 [8] Q Okay. That's sort of what I meant by two things.  
 [9] Let's start with the first work area. I want you to describe  
 [10] where it was and what you did there.  
 [11] A Should I draw it or just tell you about it?  
 [12] Q Yes. You can put -- as you're describing it, just  
 [13] put where it was and put DG No. 1 next to that.  
 [14] A Okay. The first and primary location that I would  
 [15] be at would be a small table outside of the Oval Office.  
 [16] I'll just make an arrow. DG No. 1.  
 [17] Q Okay. And why don't you tell the grand jury when  
 [18] you would be there, at that location, DG 1.  
 [19] A During a typical day, if you will, I would be at  
 [20] that location as long as we had scheduled meetings and/or  
 [21] events.  
 [22] Q And is that just meetings or events in the Oval  
 [23] Office or would that be meetings or events anywhere in the  
 [24] White House?  
 [25] A In the Oval Office, within the White House complex,

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[1] or within Washington but off the White House.  
 [2] Q All right. Now, in the typical day, if you will,  
 [3] give a rough percentage of how much time during the day you  
 [4] would spend at the location DG No. 1.  
 [5] A Well --  
 [6] Q More than half your time?  
 [7] A Well, the reason I said a typical day was that  
 [8] every day was very different so it's kind of hard to say an  
 [9] average. Having said that, I would guess maybe -- I don't  
 [10] know, 60 percent or more.  
 [11] Q Okay. Let me ask the question another way that  
 [12] might be a little more helpful to you. Assuming that the  
 [13] President is in the White House, how much time of the time  
 [14] that the President is in the White House are you spending at  
 [15] DG No. 1?  
 [16] A Well, again, it varies on how much of that time he  
 [17] might have scheduled appointments or he may just happen to be  
 [18] in the White House without scheduled appointments, so it  
 [19] would vary. But, again, on balance, I'd say 60 percent or  
 [20] more of my time would be there.  
 [21] Q All right. Let's talk about DG No. 2. First, why  
 [22] don't you tell the grand jury where that is and mark it on  
 [23] your map as DG 2.  
 [24] A Well, there's a slight error in your map here with  
 [25] regard to the room.

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[1] Q Okay.  
 [2] A For reference, if you are looking at the map where  
 [3] it says First Floor across the top and you see the Roosevelt  
 [4] Room, the room immediately adjacent to the Roosevelt Room to  
 [5] the left --  
 [6] Q The one that says Lobby or the one below that?  
 [7] A The one below the room marked Lobby. To my  
 [8] knowledge, there is not a wall. That's one large room.  
 [9] Q Okay.  
 [10] A So the wall that is represented on this diagram is  
 [11] not correct.  
 [12] Q Okay.  
 [13] A Within that room, if you make a quadrant out of  
 [14] that room, in the upper right-hand quadrant, I would have a  
 [15] desk which I will now mark on your map as DG No. 2.  
 [16] Q Okay. And under what circumstances would you find  
 [17] yourself at the location you've now marked DG 2?  
 [18] A Any time I could get away from DG No. 1. This  
 [19] was -- you know, that was the place where I would get any  
 [20] work that I needed to get done that didn't revolve  
 [21] immediately around the President.  
 [22] Q Okay. And I assume you're being facetious to at  
 [23] least a certain extent when you say you wanted to get away  
 [24] from DG 1, but what kind of work would do you when you were  
 [25] getting away from DG 1?

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1 A Well, I might file any papers, send any E-mails  
2 make any telephone calls, catalogue gift items or break down  
3 the briefing materials that we had used on a previous day or  
4 on a previous trip or assembly my own materials to carry on a  
5 trip if we were going on a trip that day, that evening or  
6 something like that. Those are the types of things I'd do  
7 back there.  
8 Q I assume from what you said that you traveled with  
9 the President when he left either Washington or the White  
10 House.  
11 A Yes, that's correct.  
12 C Now, I know -- obviously you've given us the caveat  
13 that there really wasn't such a thing as a typical day in the  
14 White House, but we'll try to do the best we can, given those  
15 constraints.  
16 A Okay.  
17 Q Assuming that the President was in the White House,  
18 in Washington, he was in Washington, he was going to work in  
19 the White House --  
20 I'll just for the record that Mr. Wisenberg has  
21 entered the room.  
22 Assuming that the President was in Washington and  
23 was going to spend at least part of the day in the White  
24 House, about what time would you come to work on a day like  
25 that?

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1 A I would take whatever time his first appointment  
2 was and back up at least 30 minutes prior to that and make  
3 sure I was in the office by then.  
4 Q Would you get the schedule the evening before so  
5 you could make that determination?  
6 A They would attempt to get the schedule, to me the  
7 evening before, but most often -- there's a weekly version of  
8 the schedule circulated and I would try to keep myself  
9 familiar with what time each day of the week started and try  
10 to keep an eye on that as it changed. I may not know what  
11 the final schedule says, but I have a general idea.  
12 Q And as a general matter, what time are we talking  
13 about there? Is it more in the 7:00 range, more in the 8:00  
14 range, more in the 8:00 range?  
15 A Usually I would get to work between 8:00 and 8:30  
16 in the morning.  
17 Q Now, when you arrived in the morning, would you go  
18 to DG No. 1 or would you go to typically DG No. 2?  
19 A Usually I would go to DG No. 2 and there I would  
20 pick up my briefing materials for the day and assembly my  
21 version of the briefing book and, you know again, do any  
22 work that I might have to do back there before moving to the  
23 other location.  
24 Q And would the weekends be any different than the  
25 weekdays? Did you work on the weekends, typically?

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1 A My supervisor was pretty good about trying to make  
2 it so that I didn't have to work on the weekends, so I would  
3 say that I worked probably -- depending on whether we were  
4 traveling or not. If we were traveling, of course I was  
5 working. If we were not traveling, I would probably work  
6 half or less of the Saturdays and almost none of the Sundays.  
7 Q When the President would arrive -- just for the  
8 purposes of what we're talking about now, let's call a  
9 typical day a day when the President is in Washington and  
10 working, at least starting his day, in the White House.  
11 A Okay.  
12 Q On a day like that, on a typical day, what time  
13 would the President usually arrive?  
14 A Usually any time between 8:30 and 9:30  
15 Q How would you learn that the President was arriving  
16 at the Oval Office? Was there some kind of signal or did  
17 people tell you? Did he have to walk by your work location  
18 in order to get there?  
19 A Well, there were a couple of different ways I might  
20 find out. If I'm in the back at DG No. 2, in that room,  
21 there is a device called the First Family Locator, which  
22 displays the whereabouts of all of the principals at any  
23 given time. That box, whenever the President moves from one  
24 location to another, it beeps and his location changes. So  
25 if I'm in the back, it may beep and I'd turn around and look

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1 at it and I see that he has arrived at the Oval Office  
2 That's one way. The second way is if I'm at location number  
3 1, I would usually see him through the window walking across  
4 the colonnade from the residence to the Oval Office  
5 Q Okay. Let me just back up for one second. In the  
6 room where DG 2 is, were there other people who had their  
7 work stations there?  
8 A Oh, yes.  
9 Q Who would that be?  
10 A Well the executive assistant to the Deputy Chief  
11 of Staff would be one of the people in that room. The staff  
12 assistant to the Director of Oval Office Operations would be  
13 one of the other people in that room. An intern from Oval  
14 Office Operations would be in there. And then the  
15 President's records manager would be in there.  
16 Q So it's mostly junior level staff people who are  
17 assigned to more senior level people within the West Wing.  
18 Is that correct?  
19 A That's correct. Actually, now I just realized as  
20 I've talked through that that I made a mistake in challenging  
21 your diagram. The wall is correct, but the proportions  
22 between those two rooms are not accurate, I don't think. So  
23 DG No. 2 should in fact be in the left-hand room there and  
24 that's the room where the five people that I just described  
25 to you work.

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1 Q Okay. Do you want to just cross that out and  
2 correct that?  
3 A Yes. But the left quadrant, I think, or the left  
4 section is roughly twice the size of the other one, so that's  
5 what threw me off.  
6 Q Let me ask you about DG 1, then as well. The same  
7 question. Who else, if anybody, was in the area where your  
8 work station, DG 1, was?  
9 A Well, in that immediate area is also where Betty  
10 Currie's desk is, the President's secretary. And then if you  
11 see the small office to the left, is where the Director of  
12 Oval Office Operations sits.  
13 Q And her name is?  
14 A Nancy Hemreich.  
15 Q Okay. Thanks. All right. Now, you had just  
16 identified for the grand jury a couple of the ways that you  
17 might notice that the President was coming to work or  
18 actually arriving in the Oval Office. Let's assume for the  
19 moment you're in DG No. 2. What do you do when you find out  
20 that the President is arriving for work at the Oval Office?  
21 A Well, depending on what his first appointment or  
22 meeting is, it may go down there to make sure that he has his  
23 materials, if it's something that he needs materials for. Or  
24 if it's a meeting that he doesn't need any materials for or  
25 it's not critical that he start in a timely fashion or

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1 necessarily finish in a timely fashion, I may not go down  
2 there at all.  
3 Q Okay. And if you're in DG 1 does that make any  
4 difference about how you treat the fact that the President is  
5 coming in?  
6 A Well, if I'm at DG No. 1 and whomever his first  
7 appointment is is not there ready to see him, if it's time  
8 for that appointment, then I will make sure that that person  
9 is either on their way or knows that they should be there.  
10 Q Okay. Did you have any responsibilities as far as  
11 setting up the Oval Office for the day?  
12 A In terms of what?  
13 Q Putting out any papers, making sure pads were out  
14 or different materials -- as a general matter now, as opposed  
15 to a specific meeting.  
16 A Yes, I would -- let me just give you an  
17 illustrative example. If we are having a bilateral meeting  
18 with Prime Minister Tony Blair, for example, it would be my  
19 responsibility to make sure that the office is appropriately  
20 arranged for that. And by that I mean that there are enough  
21 chairs and that they are situated in the right way and that  
22 they accommodate a pool spray, which is when we bring the  
23 members of the press in at the beginning of a meeting. So,  
24 yes, to the degree that that needs to be done, I'd do that.  
25 Q Okay. And there's just various protocols for the

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[1] different kinds of meetings and you're trained in what those  
 [2] are and how to implement them?  
 [3] A Yes.  
 [4] Q Okay. So now we're at the point I guess, in a  
 [5] typical day where the President comes to the Oval Office.  
 [6] What would your typical contact be with the President, at  
 [7] least for the first time of the day?  
 [8] A I probably tell him "Good morning." If we have a  
 [9] major speech to be delivered that day and I know that he's  
 [10] been working on that speech draft and it may need to be  
 [11] retyped, I might try to get that speech draft from him. If  
 [12] there's anything critically important that is occurring that  
 [13] morning -- again, let's say for example that Prime Minister  
 [14] Blair is coming, I will remind him what time Prime Minister  
 [15] Blair is expected, so I can make sure that he's aware of what  
 [16] his time constraints are.  
 [17] Q Would you on a regular basis have just regular  
 [18] conversation with the President or was it mostly  
 [19] business-like conversations?  
 [20] A I very rarely and almost never would engage the  
 [21] President in just idle kind of -- you know, did you see the  
 [22] game last night.  
 [23] Q Is there any particular reason for that or was that  
 [24] just the way your relationship, your professional  
 [25] relationship, developed?

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[1] A That was a piece of what I deemed to be  
 [2] professionalism. One of my responsibilities, I think, was to  
 [3] make sure that he had efficient use of his time and talking  
 [4] to me about the game is not what I consider an efficient use  
 [5] of his time.  
 [6] Q Fair enough. A very self-deprecating but truthful  
 [7] answer to that.  
 [8] A Unless it was the Razorbacks.  
 [9] Q Fair enough. And I guess as far as your contact  
 [10] for the rest of the day, would it basically follow along  
 [11] those lines, mostly professional, just talk related to the  
 [12] particular meetings at hand in order to get him through his  
 [13] day in the most efficient way?  
 [14] A Yes.  
 [15] Q Let me sort of shift gears for a second. Who has  
 [16] access generally to the West Wing in general?  
 [17] A You mean to the building of the West Wing?  
 [18] Q Yes. What kind of people would have access to  
 [19] that?  
 [20] A Well, I mean, I don't know what the specific  
 [21] security rules are, but it's my understanding that people  
 [22] with -- blue pass holders have unrestricted access to the  
 [23] West Wing and would go into the West Wing.  
 [24] Q And I'm not, you know, pinning you down to know  
 [25] what the exact criteria are for a blue pass holder, but just

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[1] from your experience from working at the White House and  
 [2] I know you spent a lot of time in the West Wing, what kind of  
 [3] person would get a blue pass?  
 [4] A A permanent staff person, long-time volunteer or an  
 [5] intern. Anybody from those three categories who has  
 [6] completed a background check.  
 [7] Q All right. You worked over in, say, the Old  
 [8] Executive Office Building --  
 [9] A Sorry. I just want to correct. A background  
 [10] investigation, not just a background check as someone who  
 [11] comes in the gate.  
 [12] Q Okay. And that's a full field investigation  
 [13] conducted by the FBI?  
 [14] A That's correct.  
 [15] Q All right. If you were assigned to a work area,  
 [16] say, in the Old Executive Office Building, would you get a  
 [17] blue pass or was that reserved for only people who had work  
 [18] stations in the West Wing?  
 [19] A Again, I don't know what the specific rules are,  
 [20] but, you know, I think that blue passes were also issued in  
 [21] terms of -- I think the rule is supposed to be need to be in  
 [22] the West Wing, not that you have an office in the West Wing.  
 [23] So, for example, an assistant to the President or a deputy  
 [24] assistant to the President, which is a senior commissioned  
 [25] officer, who may not necessarily have a desk or an office in

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[1] the West Wing will probably have a blue pass because they may  
 [2] need to frequently go over to the West Wing because of their  
 [3] job.  
 [4] Q So is it fair to say that mostly permanent  
 [5] employees, more senior employees, senior level employees?  
 [6] A Yes, but as I've pointed out, interns and long-time  
 [7] volunteers who have also gone through this background  
 [8] investigation and their job may give them need to go over to  
 [9] the West Wing even on occasion may have also have blue  
 [10] passes.  
 [11] Q Okay. Now, on a typical day, again, typical using  
 [12] the understand that were working with are there a lot of  
 [13] people in the West Wing or is it relatively free of people?  
 [14] How crowded is it?  
 [15] A It's pretty crowded, as the five people in that one  
 [16] office attest to, both of people who are permanently working  
 [17] over there, people who are over there for meetings and/or  
 [18] people who are just dropping papers off or whatever, passing  
 [19] through for whatever reason.  
 [20] Q Okay. Now, let me ask you to turn your attention  
 [21] more towards the portion of the West Wing that contains the  
 [22] Oval Office, the dining room and the study and that area.  
 [23] Generally as you get closer to that area, is it more filled  
 [24] with people or is it less filled with people?  
 [25] A Well, there's kind of an unwritten rule that you

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[1] should not pass by that area unless you have a reason to.  
 [2] So it would be slightly less. In general, it would be  
 [3] slightly less populated but, you know, we have events with  
 [4] guests from outside in the Roosevelt Room, the Cabinet Room,  
 [5] or even the Oval Office that causes there to be crowds of  
 [6] guests and press people on occasion.  
 [7] Q Does anybody enforce that unwritten rule that  
 [8] you've just described?  
 [9] A I mean, I've seen varying degrees of enforcement of  
 [10] that rule. You know, sometimes the uniformed division  
 [11] officers might challenge someone. They would certainly,  
 [12] I think, I mean, I don't know, I don't remember seeing any  
 [13] instances of this, but I would think if you did not have a  
 [14] blue pass and you were walking through there unescorted, they  
 [15] would challenge you. But in general, if you have a blue pass  
 [16] and according to your pass you don't require an escort, they  
 [17] wouldn't generally challenge people. They might give them a  
 [18] dirty look or something like that.  
 [19] Q So there's this unwritten rule but there's also, is  
 [20] it fair to say, a certain institutional discouraging of  
 [21] people there in the sense that there are guards there and  
 [22] it's a little less crowded and you might feel out of place if  
 [23] you were there and you didn't have business?  
 [24] A Yes. If one of my friends who happens to have a  
 [25] blue pass shows up in that hallway five minutes before Prime

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[1] Minister Blair is supposed to go into the Oval Office, I'm  
 [2] going to ask them to go away, come back or call me.  
 [3] Something like that.  
 [4] Q Now, moving sort of in that direction a little more  
 [5] specifically, when I say the Oval Office complex, I mean now  
 [6] the Oval Office, the study and the dining room, all right?  
 [7] A Okay. Were you talking specifically about those  
 [8] three rooms?  
 [9] Q Well, no. I was just talking about the oval area,  
 [10] you know, that area of the hall, but now I'm talking about  
 [11] those three rooms, okay?  
 [12] A Well if I can -- just to clarify I was thinking  
 [13] in terms of the kind of L shape, if you will, that goes from  
 [14] the Oval Office complex down to the Cabinet Room.  
 [15] Q Sort of the hall that surrounds the Roosevelt Room  
 [16] on the south end and eastern side?  
 [17] A Southeastern. That's correct.  
 [18] Q Okay. Now, as I said, let me ask you to turn your  
 [19] attention to the Oval Office complex, which I consider for  
 [20] the purposes of this conversation to be the Oval Office, the  
 [21] study and the dining room area and the pantry, that group of  
 [22] rooms, okay?  
 [23] A Okay.  
 [24] Q Who would have access? Starting with the Oval  
 [25] Office, who would have access to the Oval Office?

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[1] A To the Oval Office **itself**?

[2] Q Yes. Who would be able to enter the Oval Office?

[3] A Well, it depends on the **situation**. If the

[4] **President** is in the **Oval Office**, that's a completely

[5] different dynamic than --

[6] Q Let's start with that. Let's say the President is

[7] in the Oval Office. I assume anybody who has business with

[8] the President would obviously be allowed in. Would anybody

[9] else feel free to go in there under those circumstances.

[10] A Generally either Nancy **Herrreich**, Betty Currie or

[11] **myself** would usher anyone into the Oval Office. An **anyone** would

[12] be announced, with the kind of exceptions, if you will, of

[13] the chief of staff, the Vice President and Mrs. Clinton.

[14] **Aside** from those three, you know, people don't just want in

[15] the door.

[16] Q And even for those three people you've identified,

[17] **the Vice President** the chief of staff and the **First Lady**,

[18] **was it** common for them to just walk into the **Oval Office**

[19] **unannounced** while you were **working** there?

[20] A Yes. If we know that the President is working on

[21] his speech and that it would be better for them not to walk

[22] in, we might point **that** put to them, but we're not going to

[23] **keep them from going** in there.

[24] Q **Now**, anybody **else** you said you or Betty Currie or

[25] **Nancy Herrreich** would have to **escort** in, **is that correct**?

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[1] A Yes.

[2] Q What would **happen** if someone else tried to just

[3] **walk right into** the Oval Office?

[4] A Well, we would stop them.

[5] Q Now moving **deeper** inside the Oval **Office** complex,

[6] **what** about the dining room? **Who** would have access to the

[7] **dining room** and how would they get access to that area of the

[8] **Oval Office** complex?

[9] A **Well**, I don't know if it's necessary to review the

[10] **doors** into there

[11] Q If you feel it's **necessary** to answer the question.

[12] **please** do.

[13] A Let me just say first of all and more broadly

[14] **speaking**, that's **considered** a more private area and that,

[15] **like** the hallway, door to the Oval **Office** itself, the doors

[16] into that area **are** locked with the exception of the pantry

[17] **door** and there's a pantry between the actual **dining room** and

[18] the hallway. So you would have to run over one of the

[19] **stewards** in order to go in that way. And other doors into

[20] **that area** would be **locked**.

[21] Q All right. So would anybody have access to the

[22] **Oval Office** complex through say the **back door** to the dining

[23] **room** there? That second door? that would be locked all the

[24] **time**?

[25] A Are you talking about the one from the hallway into

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[1] **the dining room**?

[2] Q Yes. The one that's not the pantry.

[3] A Yes. I mean, **people don't just walk in** that door.

[4] Q Okay. So to **get there** --

[5] A In fact even **the Vice President** or someone who

[6] **generally** has access, the door is locked and there's a little

[7] **lock button** to **unlock it**, so he literally can't just walk

[8] through it because it's locked.

[9] Q So for the most part, then, is it fair to say that

[10] **you** have to come through the **Oval Office** to get to the dining

[11] **room**?

[12] A You would have to either come through the Oval

[13] **Office** --

[14] Q **Or have a steward let you in?**

[15] A **Someone would have to let you in from inside or**

[16] someone who knows about how to **unlock the doors** would have to

[17] **unlock** the door for you.

[18] Q All right. So is it fair to say, then, the same

[19] **rules** apply to entering the dining room as the Oval Office

[20] **except it's** a more private area?

[21] A **Yes**.

[22] Q So fewer people, then, would have access to that.

[23] A **Yes**.

[24] Q What about the study? Would you characterize that

[25] as a more private area or less **private** area than the dining

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[1] room?

[2] A Well, I think the area that you're referring to as

[3] the Oval **Office** complex is -- as a whole, it's just **treated**

[4] as a more private area.

[5] Q Okay. What about -- is the study considered more

[6] private even within the Oval Office or you would not

[7] **distinguish at that point between those rooms?**

[8] A Well, I mean, I personally would not distinguish.

[9] You know, there's another door to it, so to the extent that

[10] you want to assume that, that's an assumption. I wouldn't

[11] make that distinction.

[12] Q Fair enough. Now, you've obviously told the grand

[13] jury that you've been in the Oval Office. You've obviously

[14] been in there for work and when the President's been in

[15] there. And you've also told the grand jury that you've been

[16] in there to set up meetings and I would assume that on

[17] occasion you've been there alone to set up meetings. Is that

[18] correct?

[19] A Yes.

[20] Q Would there be any other occasions when you'd find

[21] yourself in the Oval Office alone?

[22] A I mean, if I'm going in there to make sure that the

[23] **President** has a particular set of notes or to replace an

[24] **outdated** set of notes with a revised set of notes or if I'm

[25] going in there to retrieve a speech that either a **senior**

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[1] **advisor** has a question about or, as I mentioned earlier as an

[2] **example**, that we may need to **type in** changes to that speech.

[3] those are examples of reasons that I would go in there by

[4] myself.

[5] Q Are there any reasons you'd go in there that are

[6] not business related? Would you ever just go into the Oval

[7] **Office** without a purpose?

[8] A Well, I mean, I would go in there and just

[9] appreciate the fact that I was standing in the Oval **Office** on

[10] **occasion**. I mean, I wouldn't make it a point to go in there.

[11] If the President's in the restroom, I may wait for **him** in the

[12] Oval Office and just appreciate the fact that I get to be

[13] **there**.

[14] Q Okay. That's one of the perks of having the job

[15] that you had. I would assume.

[16] A It's a nice place to be.

[17] Q What about the dining room? Would you ever find

[18] **yourself** in the dining room alone?

[19] A Yes.

[20] Q Okay. Under what circumstances would that be?

[21] A If the President is having a luncheon in **the dining**

[22] **room**, for **example**, or he has conducted interviews in the

[23] **dining room before**, I might again make sure that the seating

[24] **arrangements** are appropriate, the right number of chairs are

[25] in there, plan for where -- if it's an interview, for

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[1] **example**, where I may place the stenographer. Those types of

[2] **things**.

[3] Q And what about the study? Would you ever find

[4] **yourself** in the study?

[5] A Yes, I might.

[6] Q Okay. Could you describe to the grand jury the

[7] occasions that you might find yourself in the **study**?

[8] A **If I've gone there** -- a lot of times we would, as

[9] I've said, have events in the Oval **Office** and in those cases

[10] **audio-visual** people and members from the press **office** and

[11] **furniture** movers will come into the Oval Office to rearrange

[12] **things** for the event. In a case like that I would take the

[13] President's papers, personal papers, off the resolute desk,

[14] his desk in the Oval Office, and move them back to his study

[15] so that people **will** not be prying into them or **knocking** them

[16] off or anything like that.

[17] Q If the President were in the study using the study

[18] would you ever go into the study?

[19] A If he were in the study?

[20] Q **Yes**.

[21] A Yes, I might. I mean, it depends on what he's

[22] doing. If I know that he's napping, I'm not going to go in

[23] there. If he's **changing** clothes and were late for an event,

[24] I might go back there to point that out to him.

[25] Q Okay. To point that out that you'd be for an

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[1] event," correct?  
 [2] A Yes. Not that he's changing. He would know that.  
 [3] Q Fair enough. Now, I think it's fair to say that  
 [4] there are two kinds of people that have a lot of contact with  
 [5] the President. There would be the very senior staff people  
 [6] like the chief of staff or the special assistants or the most  
 [7] senior advisors who would have the most contact with him, but  
 [8] then there are also sort of lower level people in terms of  
 [9] the policy functioning of the White House but who have a lot  
 [10] of contact, someone like you or Betty Currie. Is that an  
 [11] accurate statement?  
 [12] A In general. Yes.  
 [13] Q Okay. I'm not talking about either of those  
 [14] categories of people now, I'm talking about sort of medium to  
 [15] low level policy people in the White House, okay?  
 [16] A Mm-hmm.  
 [17] Q Assistants or staff assistants. Would someone like  
 [18] that find him or herself in a meeting with the President on a  
 [19] regular basis?  
 [20] A Yes. I mean, it depends on what their rank is and  
 [21] what their position is and what their expertise is. if you  
 [22] will.  
 [23] C Okay. Would someone of that level, relatively  
 [24] junior level, find themselves or himself or herself in a  
 [25] meeting with the President alone?

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[1] A I wouldn't think so. I mean, it wouldn't be very  
 [2] likely, but it might happen.  
 [3] Q Okay. But it would be unusual?  
 [4] A Well, it depends again on their expertise. If they  
 [5] are a -- if they are a low level Domestic Policy Council  
 [6] assistant, but they happen to be the expert on Hope  
 [7] Scholarship funding and the congressional state of play for  
 [8] Hope scholarships, they might be in there answering a  
 [9] question for him.  
 [10] Q Okay. So --  
 [11] A If they're an expert or whatever --  
 [12] Q Assuming that you have someone who's not an expert  
 [13] in a particular area, is that the kind of person who would  
 [14] have a meeting with the President alone?  
 [15] A Well, I mean, you know, the people who answer  
 [16] the phones in the press office don't just sit around in the  
 [17] Oval Office with the President. I think that's a fair  
 [18] characterization.  
 [19] Q What about interns? Do interns generally get to  
 [20] meetings with the President?  
 [21] A Do they get to meetings with the President?  
 [22] Q Yes. Do they have meetings with the President?  
 [23] A Generally, I would not think that they do. In  
 [24] fact, my experience is that they don't.  
 [25] Q Okay. And would an intern have as a usual course

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[1] of business -- let me put this another way. Would it be  
 [2] unusual for an individual intern to have a meeting alone with  
 [3] the President?  
 [4] A Unusual but not unprecedented.  
 [5] Q Okay. When you say "unprecedented" and I'm putting  
 [6] aside a person named Monica Lewinsky for this moment, can you  
 [7] think of any other interns?  
 [8] A I mean, he -- you know, if the President were to  
 [9] find out that intern Joe Smith is Uncle Billy Bob Smith's  
 [10] nephew from Smith, Arkansas, yes. He might make it a point  
 [11] if we see that person or he may make it a point to say  
 [12] "I want Smith to come in here and get a photo, his uncle's a  
 [13] good friend of mine." Or whatever.  
 [14] Q Okay. And so that would be either a photo  
 [15] opportunity or a brief meeting?  
 [16] A Yes.  
 [17] Q All right. So that would be uncommon but not  
 [18] unprecedented.  
 [19] A Exactly.  
 [20] Q What about a long meeting with a person like that?  
 [21] A That would be highly unusual.  
 [22] Q Okay. Have you ever been in the Oval Office --  
 [23] I assume you've been in the Oval Office with the President  
 [24] alone?  
 [25] A Yes.

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[1] Q And for business reasons?  
 [2] A Yes.  
 [3] Q Okay. And I assume you've been in the dining room  
 [4] with the President alone.  
 [5] A Yes.  
 [6] Q And for business reasons again?  
 [7] A Yes.  
 [8] Q And the same with the study?  
 [9] A Yes. Everywhere except for the bathroom.  
 [10] Q Okay. Fair enough. Does the President ever take  
 [11] one-on-one meetings in the Oval, just him and another person?  
 [12] A Oh, yes. Definitely.  
 [13] Q Okay. That's a common thing?  
 [14] A Yes.  
 [15] Q And who would have that kind of access? For the  
 [16] most part, as we've described it before, mostly senior level  
 [17] people but perhaps someone of your level?  
 [18] A Well, with regard to internal people, you're  
 [19] talking about staff people?  
 [20] Q Yes.  
 [21] A Yes. I mean, I think a one-on-one sit-down meeting  
 [22] with him with a staff person is most likely to be the chief  
 [23] of staff or the director of one of the major offices.  
 [24] Something like that.  
 [25] Q What about in the dining room? Does he ever

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[1] conduct meetings like that, a one-on-one meeting, in the  
 [2] dining room?  
 [3] A Yes. Quite often -- again, when we have these  
 [4] events in the Oval Office, we have to shift his normal office  
 [5] functions to the dining room, so, yes.  
 [6] Q Okay. And what about the study? Does he ever have  
 [7] one-on-one meetings in the study with any other individuals?  
 [8] A He has, but I think that would be much less common.  
 [9] Q And what kind of person would warrant a one-on-one  
 [10] meeting in the study?  
 [11] A Well, I mean, if he -- again, to use my example,  
 [12] you know, if he has to change clothes or he's putting his tie  
 [13] on but Erskine Bowles, the chief of staff needs to speak with  
 [14] him about the budget negotiations, that would be a meeting  
 [15] that might occur in there.  
 [16] Q So more of an unusual kind of thing  
 [17] A Yes. I mean, you wouldn't schedule a meeting,  
 [18] lets get to either in the study.  
 [19] Q Okay. A little earlier you described to the grand  
 [20] jury that part of your job was to log in gifts. I assume  
 [21] from that you say, from that statement, that President  
 [22] received gifts. Is that correct?  
 [23] A Yes.  
 [24] Q Can you just give a brief outline to the grand jury  
 [25] about how the President would receive a gift?

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[1] A Well, I mean, he gets gifts everywhere he goes.  
 [2] More often than not what I'm referring to by that is a gift  
 [3] that's been given to him when we're traveling. We may be  
 [4] shaking hands with an audience in Cleveland and four, five,  
 [5] six, ten, twenty people want to give him a T-shirt. I would  
 [6] take that T-shirt, try to make sure that I have the person's  
 [7] name and address and I would log that gift or send it to the  
 [8] gift unit which is a unit of the correspondence office, and  
 [9] they would log the gift, and I would provide the information  
 [10] so that they might get a thank you letter from the President.  
 [11] Q And when you say log, you basically mean the item  
 [12] and who gave it to you and the time and the date? Some  
 [13] information like that?  
 [14] A Yes. I wouldn't log it to the time that it was  
 [15] given, but I'll prepare cards that I would attach to the gift  
 [16] that I could check off a number of quick pieces of  
 [17] information about the gift, staple a business card to the  
 [18] card, check that they handed it to the President or that if  
 [19] in fact he didn't actually take the T-shirt but I saw that  
 [20] they had the T-shirt and I accepted it on his behalf, I would  
 [21] check that off. And then put the card with the gift and then  
 [22] send the gifts over to the gift unit.  
 [23] Q All right. And I would assume that because we're  
 [24] talking about a large volume of gifts the President doesn't  
 [25] keep the vast bulk of the kind of gifts that you're

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describing right now.  
 A If I can get my hands on them before he can, he probably will not keep it.  
 Q I would assume that the President also gets more personal type gifts from either people he works with or friends of his.  
 A Mm-hmm.  
 Q Would those all be logged in as well?  
 A I mean, if they pass through me, yes, I would try to get them directly to the gift unit because there is a mechanism for him to retrieve the gifts from the gift unit. A weekly report or something like that. I don't deal with it, but somehow a report goes to him so that if there is a gift that I hid from him over to the gift unit he can get it back.  
 Q Is there another mechanism for receiving gifts?  
 A Might Betty or Nancy Hemreich keep gifts or log in gifts?  
 A Oh, yes. They might.  
 Q Okay. And how would they get a gift that was on the way to the President?  
 A I mean, I don't know. I would have to go off of what I've read in the press about how they might get gifts but, you know, I mean, you can imagine the normal way that anyone might receive a gift, either someone brings it to them or it arrives in the mail in care of them. Or a person who

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is giving the gift actually brings it into the complex and delivers it to them.  
 Q All right. But you don't have personal knowledge about that aspect of the gifts, I guess, because you're saying you're going by what you've read in the press, is that correct?  
 A Well, I mean, that's -- if I think about the ways that people get gifts, those are some of the ways that they would happen and I imagine that's exactly how they would take those gifts and they would have to address that better.  
 Q Of the gifts that the President keeps, I would assume some of them he keeps in where he works, in the Oval Office and the Oval Office complex, is that correct?  
 A That's correct.  
 Q Where within the Oval Office complex might the President keep his gifts?  
 A Anywhere that is part of his space. There are gifts that he has been given that he has had placed in some of the public, if you will, hallways. An example I'm thinking of is there's an ancient picture of the first Boston Celtic championship team in front of the West Wing and he thought that that was really nice and that people would get a kick out of that, so he had that placed on a credenza in a hallway so a lot of people can see that. He may put it in the Oval Office itself. He may put it in the Oval Office

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complex as you have defined it or in the residence, the second floor of the residence or the third floor of the residence or at Camp David. Or on Air Force One.  
 Q Let me ask you about the study for a second. Did the President keep any gifts in the study?  
 A Yes.  
 Q Do you know where he would keep them in the study?  
 A I mean, wherever. Usually -- he has a fondness for displaying things so he likes to arrange things.  
 Q As far as you know, did he have a bag of gifts under his desk in the study?  
 A I mean, I don't -- I don't recall that as a standard procedure or anything, but if it's Christmas time, he might have a bag of gifts under his desk in the study. I mean, I vaguely recall that he may have something like that, but as far as like, you know, keeping a bag of goodies under there all the time, I'm not aware of anything like that.  
 Q Did you ever see a mug anywhere in the Oval Office that would have said Santa Monica on it? Are you familiar with a mug like that?  
 A A mug?  
 Q Yes. A coffee mug.  
 A I may have. I mean, I don't remember seeing any such mug.

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Q You don't have any independent recollection of that?  
 A No. I mean, he has all kinds of mugs, so I wouldn't pay much attention to them.  
 Q Do you know the term "clutch" or "gawker"? Are those terms that you're familiar with?  
 A Yes.  
 Q Why don't you define those terms to the grand jury.  
 A Well, gawker is. I think, a more widespread term. We never used that term, so I'm not really familiar with that. Clutch is a term that's widely used to define someone who is trying to clutch onto a principal or tries to make it a point to spend time, be around, get face time, as you say, with a principal.  
 Q And when you say "principal," how far does that extend? Who are the principals?  
 A Generally when people say the principals, they're talking about the President and the Vice President, the First Lady, Mrs. Gore, and Chelsea.  
 Q Okay. Let's talk about an individual named Monica Lewinsky. Do you know a woman named Monica Lewinsky?  
 A I don't know her. I know who she is.  
 Q All right. Now, for the next couple of questions I'm going to ask you or the next few questions, I'd like you to just put aside the last month at least insofar as what

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you've seen on TV or read in newspapers or magazines.  
 A To the degree that I can, I will.  
 Q Okay. And if that becomes a problem doing that, please note that in your answer so that it's clear.  
 A Thank you.  
 Q You said that you've heard of Monica Lewinsky, is that correct?  
 A Yes.  
 Q Did you hear about her before the last month?  
 A Yes. I knew who she was before the last month.  
 Q Okay. Why don't you describe to the grand jury how you first either heard about her or came into contact with her, if you ever did.  
 A I guess the first time I came into contact with her that I can recall, and I'm sure has been somewhat tainted by what I've read in the last month to help stimulate my memory, but as I sit here now, the first time I recall was during the budget shutdown of 1995 when most of the staff of the White House were legally forbidden from coming to work.  
 Q And that was as a part of the government shutdown, correct?  
 A Yes. She was working in the chief of staffs office and therefore since all of his staff were forbidden from coming to work and she was an intern at that point, as I now know from reading, I didn't know who she was then, she

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was helping staff his office.  
 Q Okay. And the chief of staff at that point was Leon Panetta, correct?  
 A That's correct.  
 Q And his office on the map that you have would be room 111, correct?  
 A That's right.  
 Q And when she was working there during the budget shutdown do you have a recollection of where she was assigned? Or did you just see her around in the West Wing at that time?  
 A Well, she definitely was staffing one of the desks in there, but since then the desks have been rearranged under the new chief of staff, so it's kind of hard for me to remember exactly how the desks were situated. But she was at one of the desks in there.  
 Q Are we talking about room 111 or the room that's just to the right of it?  
 A Oh, I'm sorry. She would be in the unnumbered room, not room 111, but the unnumbered room between 111 and 108.  
 Q Okay. Now, you said that you remember, I guess, first having contact with her during the budget shutdown. Why don't you elaborate on that? Why do you remember having contact with her under those circumstances?

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A **Because I didn't know** -- I knew the people who worked in that office **ordinarily** and she was not one of them, so she stood out as a new face. She stood out as someone who -- not to sound **cliche'd**, but looked pretty starry eyed about being thrust into **kind of an acting staff position** during this situation, so she stood out to me in that way, too.

Q All right. Other than her sort of being enamored with having greater responsibility than most interns and **probably** working where she was, **was** there any other behavior that you noticed during this government shutdown where she **was working**?

A Well, she seemed -which is not uncommon, she seemed enamored of the President. I mean, I'm sure that **would** have made her stand out in my mind.

Q And you said that you saw her -- you knew that she worked in that room just to the right of room 111. Did you see her during that period of the government shutdown any other places in the West Wing?

A Not that I recall.

Q Okay. Have you ever seen -- well, after the government shutdown, did you have occasion to see Monica Lewinsky in the West Wing on other periods, at other times?

A I mean, I don't remember a specific day, but I'm sure I did. Yes.

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Q Okay. And what kind of situations, if you remember?

A Well, I mean, she -- she -- again, at the time, I didn't know what, but I would see her on occasion passing in the colonnade between the West Wing and the residence or the East Wing. As I now know, she was working in the Legislative Affairs Office so I would see her passing from the Legislative Affairs Office to the West Wing or you know, I might see her at an event that we had within the complex. I don't remember any specific event, but I have a vague recollection of seeing her at events.

Q Now, at this time, we're talking about -- when you see her occasionally around the White House, this is after the budget shutdown?

A Definitely after the budget shutdown.

Q Okay. So after the budget shutdown and up until whenever you stopped seeing her around the complex. Did you have a name placed in her face, or did you just know her as a person who worked in the White House and belonged there?

A I think I knew that her name was Monica. I did not know what her last name was.

Q Okay. Do you know how you knew that? Were you ever introduced to her?

A I recall vaguely introducing myself to her during the shutdown because, as I said, I didn't know who she was.

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Q Have you ever seen Monica Lewinsky in the Oval Office?

A Yes.

Q Okay. Can you describe the occasions or the occasion that you've seen that?

A There's only one occasion that I can think of specifically and that was a radio address on -- I don't remember the date or even the year or season, but she was at a radio address at some point.

Q And were there other people in the Oval Office at that time with her?

A Yes.

Q Was the President in the Oval Office at that time?

A Yes.

Q Was there anything about her visit to the Oval Office on that occasion that was different from any of the other guests of the radio address?

A Well, she -- I mean, in what way different?

Q In any way. Did she have more access to the President? Did she linger later, did she come earlier, did she exhibit any kind of behavior that distinguished her from the other guests in your mind?

A Yes. She did. She stayed after the radio address.

Q Okay. Can you elaborate on that a little bit? And specifically was that at the President's request, was that at

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[1] her request, was it at someone else's request?

[2] A I don't know whose request it was at, but whenever

[3] we have guests for a radio address they will sit as an

[4] audience and watch the President either broadcast or in this

[5] case,, since I recall it being an afternoon as opposed to a

[6] morning, he had to have been taping the radio address, so

[7] they sit and they view this taping, and after the taping, he

[8] will -- the taping may occur in the Oval Office, it may occur

[9] in the Roosevelt Room, it may occur in the Cabinet Room.

[10] wherever, but his usual practice is to then receive the

[11] guests in a receiving line in the Oval Office and so the

[12] guests will come by one by one, say hello, have a picture.

[13] visit with him briefly, and then exit the office and depart

[14] I remember her coming through the line and

[15] remaining in the outer office where the DG 1 desk is marked

[16] after she had gone through the receiving line. And then she

[17] stayed longer.

[18] Q Did that strike you as odd at the time?

[19] A A little bit.

[20] Q Why?

[21] A Well, you know as I said she had seemed kind of

[22] enamored, she would kind of stare at him, which was not

[23] uncommon for anybody in the complex, but particularly for

[24] younger staff people or interns to look at him that way. And

[25] I don't know at this point if she was an intern or a younger

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[1] staff person. As I mentioned also I had seen her at these

[2] events on occasion. I might see her at an event. And so it

[3] seemed that she, you know, was not making sure that she was

[4] scarce when near the President was around, which is kind of,

[5] again, one of these unwritten rules, which is how people get

[6] to be termed a clutch.

[7] Q Fair enough. So here you are, it's after the radio

[8] address, I assume you're somewhere near the location marked

[9] DG 1 because you know that she's in the location marked DG 1

[10] and it seemed a little -- I think, it's fair to say unusual to

[11] you that she stuck around. Did you do anything about that?

[12] A Yes.

[13] Q What did you do?

[14] A I went in and I told the President that she was

[15] still here and she was waiting to see him.

[16] Q How did you know that she was waiting to see him?

[17] A I don't remember. Either I overheard her say or

[18] someone else said to me or I asked her about it directly.

[19] I have no idea.

[20] Q But somehow you determined that?

[21] A Somehow I determined that she was expecting to see

[22] him again.

[23] Q And what was the President's response to that?

[24] A He said, you know, "Yeah, she's going to visit with

[25] me for a minute." You know, whenever I come back tell Betty

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[1] to bring her in.

[2] Q When you say "Whenever I come back," do you mean

[3] the President said, "Whenever I come back" or whenever you --

[4] what did you mean by that?

[5] A Well, I don't know whether I was leaving the room

[6] or he left the room or what, but, you know -- he was going to

[7] do something else or I was going to do something else, one of

[8] us was and then he said to tell Betty to bring her in.

[9] Q Okay. And do you know if that ever occurred? Do

[10] you know if that happened?

[11] A I have a vague recollection of Betty ushering her

[12] into the Oval Office going in then with her.

[13] Q Okay. So at the very least, you know that the

[14] President, Betty Currie and Monica Lewinsky were in the Oval

[15] Office for some period of time at that point.

[16] A Yes.

[17] Q Do you know if Betty Currie left the room such that

[18] the President and Monica Lewinsky were alone in the Oval

[19] Office?

[20] A I do not know.

[21] Q Okay. Did you get a chance to see Monica Lewinsky

[22] leave the Oval Office at that time? At any time during that

[23] day.

[24] A I don't recall.

[25] Q Okay. So is it fair to say, then, that you don't

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[1] know how long they were in there together.  
 [2] A It's true. I do not know how long the three of  
 [3] them were in there together  
 [4] Q Okay. And you don't know whether there was two or  
 [5] three or three for the whole time or two for the whole time?  
 [6] A I do not know that either. As I recall, I went --  
 [7] at that point, you know, we had gotten through our  
 [8] appointed -- taping the radio address session and I went from  
 [9] DG 1 to DG 2 at that point to do other work.  
 [10] Q Did the President seem to know who Monica Lewinsky  
 [11] was at that point?  
 [12] A Yes.  
 [13] Q Okay. How did he signal his familiarity with her?  
 [14] A Well, I was again in my role of kind of protecting  
 [15] his time. When I went in to ask him about this, I was  
 [16] basically offering to chase her away because I didn't know if  
 [17] that was a good use of his time, but he told me that no, in  
 [18] fact she is connected to someone. Now I think it's Walter  
 [19] Kaye. I don't know if he said Walter Kaye on that day or  
 [20] because I've read stuff in the paper I think it was Walter  
 [21] Kaye. He may or may not have mentioned the name in  
 [22] particular, but he did indicate that she's a friend of a  
 [23] political supporter and I just need to, you know, be nice to  
 [24] her.  
 [25] Q Just for the benefit of everybody and the record,

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[1] who is Walter Kaye?  
 [2] A Walter Kaye is a Democratic political supporter of  
 [3] the President.  
 [4] Q Did you know at that time when you went in to see  
 [5] the President, did you know Monica Lewinsky by name at that  
 [6] point? Did you see Monica Lewinsky?  
 [7] A Just by Monica.  
 [8] Q Okay. And he knew exactly who you were talking  
 [9] about when you said Monica? Or did you say there's a person  
 [10] out here or Monica's out here or do you remember?  
 [11] A I don't remember exactly how I phrased it.  
 [12] Q Okay. But he understood who you were talking  
 [13] about.  
 [14] A It's my understanding that he understood.  
 [15] Q Did you think that was unusual at the time?  
 [16] A No, not really. I mean, as I mentioned, you know,  
 [17] people who were politically connected either via Democratic  
 [18] politics, Republican politics even, you know, say Senator  
 [19] Lott's nephew were one of these people, he would frequently  
 [20] ask for them to come by and see him. So, no, it didn't  
 [21] strike me as unusual.  
 [22] Q Did you ever see her any other times in the Oval  
 [23] Office? Not the Oval Office complex, now I'm talking about  
 [24] the Oval Office.  
 [25] A No. I don't recall seeing her there.

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[1] Q What about the dining room? Did you ever see  
 [2] Monica Lewinsky in the dining room?  
 [3] A No.  
 [4] Q And what about the study? Have you ever seen  
 [5] Monica Lewinsky in the study?  
 [6] A No.  
 [7] Q Okay. Do you know whether she's ever been in the  
 [8] Oval Office other than the times that you might have seen  
 [9] her, the time you saw her?  
 [10] A No, I do not know.  
 [11] Q What about the study? Do you know if she's ever  
 [12] been in the study?  
 [13] A I do not know.  
 [14] Q What about the dining room?  
 [15] A I do not know.  
 [16] Q Okay. Have you ever seen the President alone with  
 [17] Monica Lewinsky?  
 [18] A No.  
 [19] Q Okay. Have you ever seen her enter a room where  
 [20] you knew the President to be other than the time that you've  
 [21] just described?  
 [22] A Well, I've seen her at events, as I mentioned.  
 [23] Q Alone? Have you ever seen her enter a room where  
 [24] the President was alone or you knew the President to be  
 [25] alone?

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A No.  
 Q Have you ever seen her enter a room where the  
 President would shortly enter the same room?  
 A Alone?  
 Q Yes.  
 A No.  
 Q Okay. What about in a room where the President had  
 just left?  
 A No.  
 Q Okay. And the converse. Have you ever seen her  
 leave a room where the President was alone?  
 A I'm sorry, say --  
 Q Have you ever seen her leave a room where you knew  
 the President to be?  
 A No.  
 Q Okay. And did the President ever speak to you  
 about Monica Lewinsky?  
 A Just in that one conversation.  
 Q That one time  
 A Mm-hmm.  
 Q No other times?  
 A No.  
 Q Okay. Did you ever speak to --  
 A Well, not that I remember.  
 Q Okay. Fair enough. Did you ever speak to the

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[1] President about Monica Lewinsky aside from this one time in  
 [2] the Oval Office at the radio address?  
 [3] A No. That was the only time.  
 [4] Q Did anyone at the White House ever speak to you  
 [5] about Monica Lewinsky?  
 [6] A You mean in the whole history of up until now?  
 [7] Q Yes. Can you remember anything in particular?  
 [8] A I mean, clearly in the past couple of months,  
 [9] several hundreds of people have spoken to me about her.  
 [10] Q I can imagine. I think many of us are in that  
 [11] position. Can you remember any particular conversations that  
 [12] you had with anybody at the White House before the last  
 [13] couple of months?  
 [14] A Yes. I vaguely remember at some point going to  
 [15] Evelyn Lieberman and telling her about seeing Monica at these  
 [16] events and it seemed to me, as I said, that she was kind of  
 [17] going out of her way to be walking down the colonnade the  
 [18] same time that we were. I mean, which was not uncommon for  
 [19] that to happen for me to go to a supervisor or someone else  
 [20] about something like that.  
 [21] Q Okay. To me that sort of begs two questions. The  
 [22] first one is why would you go to Evelyn Lieberman of all  
 [23] people to express that concern?  
 [24] A Evelyn Lieberman was the Deputy Chief of Staff for  
 [25] operations at that point and, as such, her job

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[1] responsibilities included the kind of management or running  
 [2] of the White House, as opposed to the politics and the policy  
 [3] of different agencies.  
 [4] Q Did she have a reputation as sort of being a  
 [5] traffic cop, kind of a tough person who --  
 [6] A She definitely has a reputation as a tough person.  
 [7] Yes.  
 [8] Q Okay. And one of her areas of concern was who was  
 [9] where in the West Wing? Is that fair to say?  
 [10] A Yes. Just people being where they should be.  
 [11] Q Okay. Is that one of the reasons you went to speak  
 [12] to her?  
 [13] A Yes. I mean, the combination of this being an  
 [14] issue of people not being where they should be and the fact  
 [15] that this had to do with someone who, as I recollect, at that  
 [16] point was a staff person that I thought was going out of  
 [17] their way to be wherever we were. So I went to her as a  
 [18] management issue.  
 [19] Q And, second why was that a concern of yours? Was  
 [20] that part of your job description or did you take that upon  
 [21] yourself or is that connected with your mission to keep the  
 [22] President's time as sacred as possible?  
 [23] A Yes. It's directly related. I mean it seems like  
 [24] an insignificant piece, but if we spend two seconds saying  
 [25] hello to a staff person on the colonnade instead of looking

OIG-Starr

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{1] at a briefing card, that's a waste of his time. And so if  
 {2] **I think** people are **going** out of **their** way to **have** those  
 {3] chances to say hello or whatever. then I'm going to say  
 {4] **something** about it, either to them directly or to someone in  
 {5] the management.  
 {6] Q Okay. Now, from October 94 to December 97 while  
 {7] you were at the White House how many people did you speak to  
 {8] Evelyn Lieberman about regarding this particular problem?  
 {9] A I have no idea.  
 {10] Q More than 10?  
 {11] A I have no idea.  
 {12] Q Was it a common thing for you to go to her?  
 {13] A It was absolutely common for me to go. I mean, you  
 {14] know, usually I would go directly to that person and say  
 {15] something to them. I may have in this case. I may have done.  
 {16] it and found her unresponsive. I don't know if I did. Or  
 {17] maybe I didn't want to take the time to fool with it, so  
 {18] I went directly to Evelyn. I have no idea.  
 {19] Q Would you consider that unusual for you to go to  
 {20] Evelyn Lieberman and tell her that there's a particular  
 {21] person that you perceive as being, for lack of a better word,  
 {22] a clutch?  
 {23] A No. As I said, I view that as a management issue.  
 {24] You know, it's the staff not doing their job right and it's  
 {25] something that needs to be addressed by their immediate

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A No.  
 Q Okay. Have you ever heard --  
 A Well, aside from -- let me just correct that.  
 Aside from seeing footage of them hugging on this rope line  
 which I know from seeing myself in the footage that I was  
 there, but I don't even recall that happening. I'm sure I've  
 witnessed it, but I don't remember it. Because of that film.  
 Q And you're talking about that sort of widely played  
 footage that you see on CNN and other networks where there is  
 the rope line and the President --  
 A The black beret and -- yes.  
 Q And they hug at that time.  
 A Yes. Which would like to point out, though, is  
 completely not uncommon for the President to hug, you know, a  
 woman of any age, a man of any age, you know, a 60-year-old  
 woman, a 25-year-old woman, a 38-year-old man. You know.  
 Whatever. I mean, he's a very hugging kind of guy, so -- it  
 bothers me a little bit that that footage keeps coming up in  
 this.  
 Q It bothers you that it's taken on a sort of  
 sinister context?  
 A Yes. Like it's some kind of secret hug or  
 something. I mean, I've seen the man hug literally thousands  
 of people.  
 Q Okay. So it's fair to say, then, when you see that

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{1] supervisor and whomever their immediate supervisor was on an  
 {2] issue like that, they were answering to Evelyn.  
 {3] Q So as near as you can sort of recall, what did you  
 {4] say to Evelyn Lieberman at this meeting about Monica?  
 {5] A I mean, to say that we had a meeting is definitely  
 {6] not a good characterization. I mean, if I had this  
 {7] conversation, which I vaguely recall having, I probably just  
 {8] ran down the hallway to her office and said, "Hey, can you do  
 {9] something about so and so." And that was it.  
 {10] Q Okay.  
 {11] A I mean there wouldn't have been -- you know, a big  
 {12] drawn out -- schedule meeting with her, sit down and talk  
 {13] about it. It wouldn't be that formal.  
 {14] Q Okay. Do you remember what her response was?  
 {15] A I do not.  
 {16] Q Okay. Did she seem receptive to the fact that you  
 {17] told her?  
 {18] A I mean, I don't remember this conversation, but she  
 {19] was generally receptive to my suggestions and my point of  
 {20] view.  
 {21] Q Okay. So is it fair to say then that the fact that  
 {22] you don't remember anything about it means that it probably  
 {23] went just like any other of the many meetings that you had  
 {24] with her, you told there was a problem with a particular  
 {25] individual, she said I'll take note of that or whatever.

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{1] hug, based on the contact you've had with the President over  
 {2] a little over three years, that that's not an unusual thing,  
 {3] that's not unusual behavior on a rope line.  
 {4] A That's correct.  
 {5] Q Have you ever heard about Monica Lewinsky being  
 {6] alone with the President either at the White House or  
 {7] anywhere else?  
 {8] A No, not aside from current press reports of this  
 {9] Officer Fox.  
 {10] Q Okay. So other than what you've read about what  
 {11] Officer Fox said, you have no other knowledge.  
 {12] A I have no other knowledge.  
 {13] Q Okay. Do you have any indirect knowledge about the  
 {14] relationship or any relationship between Monica Lewinsky and  
 {15] the President?  
 {16] A You mean like gossip? Have I heard gossip about  
 {17] that?  
 {18] Q Putting aside the last month, were there rumors  
 {19] about that at the White House?  
 {20] A No.  
 {21] Q Was there any gossip?  
 {22] A No.  
 {23] Q Okay.  
 {24] A About them having some kind of physical  
 {25] relationship, I assume, is what you're saying.

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{1] A Yes. And I would go to Evelyn with all manner of  
 {2] problems. Yes. Sometimes just to vent or to complain.  
 {3] So --  
 {4] Q As a result of that -- I called it a meeting,  
 {5] I know you said it's less formal but let's just for the  
 {6] moment use the term meeting, as a result of that meeting or  
 {7] discussion, whatever, did you notice any change?  
 {8] A I never gave another thought.  
 {9] Q Okay. So is it fair to say that because you never  
 {10] gave it another thought Monica Lewinsky at least as far as  
 {11] being around the President too much, that problem was solved?  
 {12] A I mean, I don't have a good sense of the time line  
 {13] on this kind of stuff so I don't really know. I mean,  
 {14] I don't remember like going to her and having this  
 {15] conversation several times, so I assume that that means that  
 {16] the problem went away.  
 {17] Q Okay. Did you ever speak to anyone else at the  
 {18] White House about Monica Lewinsky other than Evelyn  
 {19] Lieberman?  
 {20] A Prior to the last few months?  
 {21] Q Yes.  
 {22] A Not that I remember. I mean, I probably did.  
 {23] I don't remember any specific conversations, though.  
 {24] Q Okay. Did you ever see the President and Monica  
 {25] Lewinsky have any physical contact?

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{1] Q Well, let's just start with a relationship at this  
 {2] point.  
 {3] A I heard no rumors about that.  
 {4] Q Okay. Then I would assume if there was none about  
 {5] a general relationship, then there was none about a specific  
 {6] one.  
 {7] A Correct.  
 {8] Q Okay. Do you know why Monica Lewinsky was  
 {9] ultimately transferred from the White House?  
 {10] A I do not.  
 {11] Q Okay. Do you know why she was hired at the White  
 {12] House?  
 {13] A I do not.  
 {14] Q Did you ever see Monica Lewinsky at a place where  
 {15] the President was traveling outside of Washington or outside  
 {16] the White House?  
 {17] A I remember seeing her at an event here in  
 {18] Washington outside the White House.  
 {19] Q And where was that event?  
 {20] A It was at one of the hotels. We go to all of them  
 {21] so many times I don't remember. I think it was one -- a  
 {22] hotel on Capitol Hill, but I don't remember which one it was.  
 {23] Q Okay. And during that, this particular event that  
 {24] you have in mind right now, did the President and Monica  
 {25] Lewinsky ever spend any time alone?

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[1] A No.  
 [2] Q Okay. Have you ever heard that the President and  
 [3] Monica Lewinsky were at a place together outside of the White  
 [4] House or outside of Washington?  
 [5] A No.  
 [6] Q Okay. Other than what you've just generally  
 [7] described about guarding the President's time, was it part of  
 [8] your job to keep Monica Lewinsky away from the Oval Office?  
 [9] A Specifically, people like her? I don't understand.  
 [10] Q No, I'm talking about her in particular. Aside  
 [11] from your general job of protecting the area and the  
 [12] President's time, was it part of your job to deal  
 [13] specifically with her?  
 [14] A No.  
 [15] Q In any way?  
 [16] A No. You mean was I ever assigned to keep Monica  
 [17] away?  
 [18] Q Yes.  
 [19] A No.  
 [20] Q Did anybody ever talk to you about that?  
 [21] A No. Not that I recall.  
 [22] Q Okay. Is that something that you would recall if  
 [23] it had happened?  
 [24] A It's hard to say. I mean, given the events of the  
 [25] last couple of months, it seems like I would recall it, but

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[1] I don't recall ever being assigned to keep any specific  
 [2] individual way from the President, so that's why I make that  
 [3] assumption.  
 [4] Q Okay. Do you know if the President ever received  
 [5] gifts from Monica Lewinsky?  
 [6] A I do not know.  
 [7] Q Okay. Do you know if the President ever gave gifts  
 [8] to Monica Lewinsky?  
 [9] A I do not know.  
 [10] Q Did you ever have any social contact with Monica  
 [11] Lewinsky?  
 [12] A Did I date her?  
 [13] Q Well, let's start with the more general. Did you  
 [14] ever go to a party that she was at or go out to dinner with a  
 [15] group of people?  
 [16] A I don't recall ever seeing her at a social event  
 [17] Q A anything like Christmas parties at work or some  
 [18] kind of event like that?  
 [19] A I don't recall seeing her at any events like that.  
 [20] Q Okay. And then I assume at that point then you  
 [21] never went out on a date with her or anything like that?  
 [22] A No. Absolutely not.  
 [23] Q Did you ever go out to dinner in a group of people  
 [24] and she was in that group?  
 [25] A No.

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[1] Q Drinks or something like that? Happy hour?  
 [2] A No.  
 [3] Q Okay. Did you ever speak to Tim Keating about  
 [4] Monica Lewinsky?  
 [5] A I don't remember speaking to Tim about her. It  
 [6] would not be out of the question for me to have done so  
 [7] because he -- I probably would have viewed Tim, if in fact he  
 [8] was still in his position during the time that I recall this  
 [9] going on with Monica showing up at places, I might have  
 [10] addressed it with him because I would have viewed him as her  
 [11] more direct supervisor between her and Evelyn, but I don't  
 [12] recall specifically having a conversation with him about it.  
 [13] Q Okay.  
 [14] A I assume that everybody back there knows who Tim  
 [15] Keating is.  
 [16] Q Why don't you tell everybody? But I think they do.  
 [17] A Tim was the staff director for the Office of  
 [18] Legislative Affairs during some of this period. I don't  
 [19] remember exactly when he left the White House staff. He no  
 [20] longer is in that position.  
 [21] Q Okay. And let's not forget the people over there.  
 [22] A Sorry, I didn't know he was such a household name.  
 [23] Q Some people are better known than others in certain  
 [24] circumstances.  
 [25] A In certain circles.

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[1] Q Now let's focus a little bit on in the last four  
 [2] weeks, okay? Has anybody from the White House spoken to you  
 [3] since the story basically broke in the media about Monica  
 [4] Lewinsky?  
 [5] A Oh, I'm sure. You know, again, hundreds of people.  
 [6] You know, staff people talk to each other about what their  
 [7] take on it is, et cetera. I mean, it's part of the buzz.  
 [8] Q Okay. And as part of the buzz, did you hear from  
 [9] anybody that the President had had any kind of relationship  
 [10] with Monica Lewinsky?  
 [11] A No.  
 [12] Q Okay. As part of the buzz, did any instance that  
 [13] you had noticed in the past take on new significance in light  
 [14] of what you heard now? And let me give you just an example  
 [15] to make that a little more clear question.  
 [16] Sometimes you just walk down the street and you're  
 [17] just walking down the street, it's a regular afternoon, you  
 [18] go home and you look at the news and you realize there was a  
 [19] bank robbery like two blocks from where I was and you find  
 [20] out that the bank robber was driving a blue car and you  
 [21] didn't even notice the blue car when it passed by you but in  
 [22] light of the news report you say, "Oh, you know, I saw a blue  
 [23] car drive right down Constitution Avenue and I was there at  
 [24] that time." So it takes on new significance in light of what  
 [25] you heard, if anything.

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[1] As part of what you've been hearing now, and I'll  
 [2] loosely call it the buzz like you did, is there anything that  
 [3] takes on new significance in that way to you? Any events?  
 [4] A If it sounds like you're kind of asking if I've  
 [5] remembered something that maybe didn't seem significant to me  
 [6] before that has been drawn out by this process.  
 [7] Q That's a better way of putting it.  
 [8] A I think it's always hard and definitely subjective  
 [9] to try to figure out did I remember this because it was  
 [10] significant at the time or do I remember it now because  
 [11] Monica's picture is on the cover of Newsweek. I mean, it's  
 [12] certainly hard for me to distinguish anything like that.  
 [13] I don't recall any moments of insight or any epiphanies that  
 [14] I've had where I said, "Oh, yeah, that's why this was  
 [15] happening" or that or anything like that.  
 [16] You know, certainly either -- maybe my memory was  
 [17] helped by stuff that I've heard, maybe even tainted or  
 [18] influenced, or, you know, I remember all of those experiences  
 [19] but only was able to recall this one with Monica because now  
 [20] all of a sudden she's got this prominence. But I haven't had  
 [21] any, like I said, epiphanies or flashes of insight.  
 [22] Q Did anybody at the White House speak to you -- now  
 [23] I'm talking about after you had gotten your subpoena now, did  
 [24] anybody at the White House talk to you about either your  
 [25] testimony here today or appearing here today or this case?

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[1] A After I received my subpoena?  
 [2] Q Yes.  
 [3] A No.  
 [4] Q Did anybody before you received your subpoena?  
 [5] A I had a conversation with Bruce Lindsey prior to  
 [6] being subpoenaed.  
 [7] Q Okay. And what was that conversation about?  
 [8] A Well I don't want to discuss the conversation with  
 [9] him. I'm told that it's protected by an attorney-client  
 [10] privilege.  
 [11] Q Okay. So you're now -- in response to my question  
 [12] what was that conversation about, you're saying that that was  
 [13] an attorney-client privilege?  
 [14] A I consider that discussion privileged. Yes.  
 [15] Q Okay. As an attorney-client privilege.  
 [16] A Yes.  
 [17] MR. BINHAK: Okay. Let's put that aside.  
 [18] MR. WISENBERG: Steve, could I ask a question about  
 [19] that?  
 [20] MR. BINHAK: Absolutely. Absolutely.  
 [21] BY MR. WISENBERG:  
 [22] Q We need to make this clear for the record,  
 [23] Mr. Goodin, do you believe this is attorney-client  
 [24] privilege because you have been told this is the President's  
 [25] or the White House's position or are you saying that you went



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1 have not been covered in this session as far as I can recall.  
 2 Q Okay. And so you're continuing, then, with respect  
 3 to the subject matter of the conversation, what you actually  
 4 said to him and what he said to you, you're continuing on  
 5 advice of counsel to invoke the attorney-client privilege on  
 6 that?  
 7 A Yes, I am.  
 8 Q Okay. Now, let me ask -- we might ask you back or  
 9 might not ask you back at a later date for future discussions  
 10 or litigation about that. Do you understand?  
 11 A Yes.  
 12 Q Okay. We got some other questions for you and we  
 13 have some questions that the grand jurors have asked us to  
 14 ask.  
 15 A Okay.  
 16 Q You mentioned early on a First Family Locator, kind  
 17 of a thing that you could both hear and perhaps see that  
 18 would tell you where the First Family was?  
 19 A Yes.  
 20 Q Is there any -- how shall I phrase this -- hard  
 21 copy, for want of a better word, version of that any  
 22 historical version of the First Family Locator where you can  
 23 go and find out through that locator or a similar type device  
 24 where they've been at all times?  
 25 A I don't know exactly the answer to that, but it's

1 Office complex, you know this as the dining room, correct?  
 2 A Yes I do. That is the dining room.  
 3 Q Okay. All right. Let me ask you to write dining  
 4 room on there.  
 5 A Okay.  
 6 Q All right. This would be to the left of that,  
 7 whose room when you were working there, to the left of the  
 8 dining room?  
 9 A To the left of the dining room, this room would be  
 10 the office of the senior advisor who has been George  
 11 Stephanopoulos or currently Rahm Emmanuel.  
 12 Q Okay. And how do you spell Rahm. R-o-h-m?  
 13 A R-a-h-m  
 14 Q Okay. And there is a door between the dining room  
 15 and the Stephanopoulos office, correct?  
 16 A That's correct.  
 17 Q Is that typically open or closed?  
 18 A It's pretty much always closed.  
 19 Q All right. Based upon your time served as the  
 20 aide, how common was it for access to the Oval Office, the  
 21 dining room, to the study, to be obtained by anybody by going  
 22 through the Stephanopoulos door into the dining room?  
 23 A Pretty much never.  
 24 Q Okay.  
 25 A The President might use that door to step in there

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1 my understanding that the Secret Service logs which that box  
 2 is reflective of become a part of the permanent daily record  
 3 that's compiled by the diarist.  
 4 Q Okay.  
 5 A In other words, that log goes on a daily basis to  
 6 the diarist. I also think it's important to point out that  
 7 the locator box is not foolproof and, in fact, on several  
 8 occasions I can recall locking at it and nothing that it was  
 9 wrong, that they might show the President on the locator box  
 10 in the Oval Office when I know that he's been over in the  
 11 residence for 45 minutes because it's maintained by the  
 12 uniformed division officers and therefore there's human error  
 13 involved.  
 14 Q How generally -- did you find it to be generally  
 15 reliable?  
 16 A I mean, for the most part. In the example that  
 17 we mentioned it, when he's coming over to the office for  
 18 the first time of the day, it was very reliable. Even then,  
 19 it would still be -- the time documented would often be off  
 20 by a matter of minutes, but it was generally reliable in that  
 21 situation. I wouldn't use it as the Bible.  
 22 Q You mentioned the diarist. Would that be Janice  
 23 Kearney or Ms. McCatherine?  
 24 A McCatherine.  
 25 Q Okay. There are two diarists, correct? Or do you

1 to ask Mr. Emmanuel or Mr. Stephanopoulos a question, but,  
 2 you know people, people don't use the door the other way  
 3 around. In fact, it may be locked similar to the  
 4 other doors. I don't know particularly, but I think that it  
 5 is.  
 6 Q In other words, the President can go fetch, you  
 7 can't go fetch the President.  
 8 A Exactly. That was the rule.  
 9 Q All right. You mentioned this incident that you  
 10 recall where Ms. Lewinsky stayed around after a radio  
 11 address was hovering in DG 1, the room that DG 1 is in. Is  
 12 that correct?  
 13 A Yes.  
 14 Q And ultimately I believe you said that Betty Currie  
 15 ushered her in. Is that correct?  
 16 A That's how I recall it. Yes.  
 17 Q Do you recall roughly when that was? Can you put  
 18 any kind of timeframe on it?  
 19 A Time of day?  
 20 Q No, I think you said it was right after the taping,  
 21 perhaps a Friday taping of the radio address?  
 22 A Well, in assuming that it was a taping of the  
 23 radio address, I know that it wasn't morning time. And  
 24 typically we would do that on a Friday or maybe a Thursday if  
 25 we were traveling Friday, so I'm not sure which day of the

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1 know Ms. McCatherine as the diarist?  
 2 A Well, I know Ms. McCatherine as the diarist only.  
 3 Q Okay. I want to talk about something here; I  
 4 might have missed it when I stepped out of the room and if I  
 5 did, I apologize. Were looking at DG No. 1. I want to show  
 6 you what's called the Oval Office complex in this map is also  
 7 known as the dining room by you, is that correct?  
 8 A As I heard the other counsel describe it, the  
 9 dining room is a component of the Oval Office complex.  
 10 That's my understanding.  
 11 Q All right. I'm talking about this room on this  
 12 map, just to the left of the study.  
 13 A Yes. I just want to clarify, though, my  
 14 understanding, the way that you used that term is to refer to  
 15 the dining room, the study, the hallway, the pantry and the  
 16 private restroom.  
 17 MR. BINHAK: And the Oval Office itself.  
 18 THE WITNESS: Okay. I was excluding the Oval  
 19 Office from my own point of view.  
 20 BY MR. WISENBERG:  
 21 Q Okay. Well, that's not how I'm referring to it as.  
 22 A Okay. That's important.  
 23 Q Let's just call it the dining room, okay?  
 24 A Okay.  
 25 Q You know this room that on this map says Oval

1 week it was, but that would be a natural guess.  
 2 Q If they've done live, they've done Saturday  
 3 morning?  
 4 A Yes.  
 5 Q What makes you think it wasn't a Saturday morning?  
 6 A I don't know. I recall it being a taping. I  
 7 recall it being a weekday. It was more like a normal day  
 8 instead of, you know, a sunny Saturday. Saturdays are more  
 9 relaxed. I don't remember anybody being in casual attire, so  
 10 that's probably what makes me think that.  
 11 Q Okay. And would it be fair to say you're not sure  
 12 what time of day it was?  
 13 A I'm not sure.  
 14 Q Okay. On this particular day in question, you saw  
 15 Betty usher in Ms. Lewinsky. When Betty typically ushers in  
 16 a guest to the Oval Office, and I take it she ushered her in  
 17 through the door from the DG 1 area, correct?  
 18 A Yes. That's what I recall.  
 19 Q When Betty does that, does she typically then leave  
 20 the guest there and go back out to her desk?  
 21 A It would depend entirely upon who the guest is.  
 22 Q Okay. How soon did you leave the area after Betty  
 23 ushered in Ms. Lewinsky?  
 24 A Almost immediately, as I recall it.  
 25 Q Okay. So basically, you're not really in a

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[1] position to tell us how long Ms. Currie stayed in there if  
[2] she stayed in there 30 seconds or if she stayed in there 15  
[3] minutes? Is that a fair statement?  
[4] A Yes. She could have been in there 30 seconds, 15  
[5] minutes or an hour.  
[6] Q is there some reason that you didn't want to see if  
[7] Mrs. Currie stayed in there or not?  
[8] A No. I mean I don't recall thinking, "Ooo. I want  
[9] to hide my eyes from this." I don't recall thinking anything  
[10] like that."  
[11] Q I'm sorry?  
[12] A I was going to say as we talked about it would be  
[13] natural for me at that point to go back to my other desk. As  
[14] I said, that's my only chance to kind of get away from  
[15] everything that's going on, the chaos of the schedule and in  
[16] fact do quiet work, sit down at my desk.  
[17] Q It didn't make you uncomfortable in any way and  
[18] that didn't have any effect on why you left the area?  
[19] A No.  
[20] Q That's a two-part question. Did it make you  
[21] uncomfortable in any way?  
[22] A I don't recall it making me uncomfortable and I  
[23] don't think that I went back to the D8 2 area because I  
[24] didn't want to be there to see what happened.  
[25] Q And DG 2, you would sometimes be at DG 2 even if

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[1] because of President Clinton's -- what he has suffered in the  
[2] media?  
[3] A I mean, I consider that to be such a basic element  
[4] of common sense --  
[5] Q Nobody would have to say anything?  
[6] A -- that no one would have to say that to me. I  
[7] mean, that's -- that's my opinion. That would be my opinion.  
[8] I don't need someone to tell me that.  
[9] Q And no one has told you that?  
[10] A Not that I remember.  
[11] Q Has the President talked to you in the last  
[12] approximately two months about Monica Lewinsky?  
[13] A No.  
[14] Q The President never had a conversation with you in  
[15] approximately the last two or three months or even let's take  
[16] it back six months where he talked to you about, for  
[17] instance, that's -- that's my opinion. That would be my opinion.  
[18] remember Monica was only here at such and such a time? No  
[19] conversation along those lines?  
[20] A No. No conversations like that.  
[21] Q Anybody have any conversation with you in relation  
[22] to the Jones v. Clinton lawsuit?  
[23] A I mean, not a substantive conversation. I'm sure  
[24] it's a matter of, again it's one of the tactical things that  
[25] is an element of the administration. No.

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[1] the President was in the Oval Office?  
[2] A Yes.  
[3] Q Okay. Now, my other question is do you know what  
[4] time of year or what year, what month, this occurred?  
[5] A I don't.  
[6] Q Do you know whether or not Ms. Lewinsky was still  
[7] either an intern or a staffer in Legislative Affairs?  
[8] A I do not know.  
[9] Q As opposed to her later job at the Pentagon  
[10] A Yes. I have no idea where that fell in the time  
[11] line of her employment.  
[12] Q Did Evelyn Lieberman ever give you general  
[13] instructions about clutches, clutchers or clutches, and what  
[14] you were to do about them?  
[15] A I don't remember having any conversations with her  
[16] about it. It would not be out of character for her to tell  
[17] me, you know, you tell me what people are doing this and I'll  
[18] take care of it. It's consistent with how I reacted to it.  
[19] Q Were you aware of an appearance problem? You were  
[20] there during the time Panetta was there, correct?  
[21] A Yes.  
[22] Q Were you aware from anybody, including Mr. Panetta  
[23] and Ms. Lieberman but anybody, of a particular reason to be  
[24] careful of female clutches because of the appearance problem  
[25] involving the President? Going all the way back to the

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[1] Q Okay. Nobody -- I'm not sure I understand your  
[2] answer. Nobody had a conversation with you that related in  
[3] any way to this lawsuit, if you get called I want you to say  
[4] this or, you know, there is this lawsuit, one of the  
[5] allegations involves woman A or woman B, now, what do you  
[6] remember about woman A or woman B?  
[7] A I have not been instructed by anyone on how to  
[8] react to any questions like that from anyone. I have not  
[9] been contacted by any of the attorneys involved in the suit  
[10] on either side in any way whatsoever.  
[11] Q Okay. So there has been no conversation,  
[12] basically, other than, as I understand your answer, from a  
[13] colleague who might be saying have you heard this about this  
[14] lawsuit, there's been no substantive conversation.  
[15] A That's correct.  
[16] Q About that lawsuit with anybody at the White House  
[17] A That's correct.  
[18] Q Why did you go to Evelyn Lieberman? You said that  
[19] you went to Evelyn Lieberman at some point about Ms. Lewinsky.  
[20] On this particular occasion, why did you go to her rather  
[21] than maybe the immediate supervisor or Ms. Lewinsky? Because  
[22] I think you told us sometimes you'd go to the clutcher, you'd  
[23] go to the individual directly and say cut that out or  
[24] something.  
[25] A Yes.

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[1] campaign. Issues involving women, things like Jennifer  
[2] Flowers?  
[3] A Well I don't recall Mr. Panetta Ms. Lieberman or  
[4] anyone else pointing that out to me or having a discussion  
[5] with me about it. As a matter of common sense, with regard  
[6] to politics, you know, young attractive women or women in  
[7] general around a male principal is a matter of concern about  
[8] perception.  
[9] Q There was no particular concern at the Clinton  
[10] White House about that? I'm not saying there would be  
[11] anything wrong with that, just because of his particular --  
[12] the allegations against him. That was not something that you  
[13] all were particularly alert about?  
[14] A I haven't served in another administration so I  
[15] don't know how to compare that.  
[16] Q Well even aside from comparison, were there  
[17] special instructions in that regard?  
[18] A There were no special instructions. I mean a ain,  
[19] as a matter of common sense, you know, people are aware of  
[20] charges that get levelled at any particular principal.  
[21] certainly those levelled at President Clinton, and therefore  
[22] that might be an issue that they would be -- anybody who  
[23] works there would be more sensitive to.  
[24] Q Has anybody ever said to you one of the reasons we  
[25] want to be careful about the clutches or the clutchers is

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[1] Q Why did you go to Evelyn directly instead of the  
[2] supervisor or to Ms. Lewinsky?  
[3] A Well, I don't recall specifically, is the short  
[4] answer. As we've talked about it during the course of the  
[5] afternoon, I may have in fact confronted her directly and she  
[6] was not responsive; I may have in fact talked to Tim Keating  
[7] whom I would have perceived as her direct supervisor about  
[8] it. I don't recall doing that. Or it may be that I was  
[9] just -- I didn't have time to go find Tim Keating's phone  
[10] number and Evelyn Lieberman is just down the hallway from me.  
[11] Or I may be talking to her about some other issue and just  
[12] mention it in passing. I don't know the answer to that  
[13] question. There are several reasons.  
[14] Q Keating would not be some guy you would be ignorin  
[15] on purpose.  
[16] A No. I had a very good relationship with him.  
[17] Q Bright guy, able administrator?  
[18] A Very capable. Yes.  
[19] Q Knows what's going on around the White House as  
[20] much as anybody else?  
[21] A Yes.  
[22] Q By the way, did you hear anything during this same  
[23] time period that Ms. Lewinsky is there and that you're  
[24] noticing that she's trying to get quality time with a  
[25] principal --

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[1] A Well, I didn't say quality time. Face time.  
 [2] Q Face time. Okay. My words, quality time. Face  
 [3] time with a principal. Did you hear anything about her work  
 [4] abilities? Her abilities at the job she was actually  
 [5] assigned to?  
 [6] A No. I don't recall. I don't recall being involved  
 [7] in any discussions about her work capabilities, nor would I  
 [8] generally know what her work product was or how to evaluate  
 [9] it.  
 [10] Q Do you know Nel?  
 [11] A Nelvis?  
 [12] Q Yes. The steward.  
 [13] A Mm-hmm.  
 [14] Q Do you know him as Nelvis or Nel or --  
 [15] A I call him Nel or Nelvis.  
 [16] Q Okay. Have you ever spoken with him about Monica  
 [17] Lewinsky?  
 [18] A No.  
 [19] Q All right. Has he ever spoken to you about Monica  
 [20] Lewinsky?  
 [21] A No. Not that I remember.  
 [22] Q Do you know anything about his relationship to  
 [23] Monica Lewinsky?  
 [24] A No.  
 [25] Q How about Glen Mays? Isn't he the other steward?

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[1] A Yes. Glen Mays is the other steward.  
 [2] Q Same questions for him.. Do you recall any  
 [3] discussions with him about Monica Lewinsky?  
 [4] A No.  
 [5] Q Either you talking or him talking?  
 [6] A I don't recall conversations in either direction.  
 [7] Q Do you ever recall an incident where either one of  
 [8] those individuals were upset about something that somehow  
 [9] related to Monica Lewinsky and relayed that to you directly  
 [10] or indirectly?  
 [11] A No I mean, over the course of three years, I had  
 [12] several conversations with them about things that they may  
 [13] have been upset about and I don't ever recall Monica Lewinsky  
 [14] being one or even involved in anything that they were upset  
 [15] about.  
 [16] Q All right. Were there ever any -- you were asked  
 [17] about hearing things, rumors about a relationship. Were  
 [18] there any events during the time that she was working as an  
 [19] intern, as a staffer or over at the Pentagon, any events that  
 [20] occurred which led you to conclude there might be a  
 [21] relationship between Monica Lewinsky and President Clinton?  
 [22] A No There was nothing that would lead me to  
 [23] conclude that.  
 [24] Q Assuming that she wanted to have time alone with  
 [25] the President, that that was one of her goals in life, would

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[1] you and Nancy Hemreich be an impediment to that goal? And  
 [2] I'm not implying there would be anything wrong with you being  
 [3] an impediment.  
 [4] A I think it's -- Nancy Hemreich and I would be  
 [5] considered an impediment to just about anybody wanting to  
 [6] spend time with the President.  
 [7] Q And why is that?  
 [8] A Because it's our job to make sure that his time is  
 [9] used efficiently and what other people want of his time is  
 [10] often not consistent with what's an efficient use of his  
 [11] time.  
 [12] Q Was Nancy your superior?  
 [13] A Yes.  
 [14] Q And did she give you any special instructions in  
 [15] this regard about people trying to get face time with the  
 [16] President?  
 [17] A I don't recall ever getting any instruction from  
 [18] her. It would be more likely that I would describe to her  
 [19] what I do or how I do things and make sure that she didn't  
 [20] have a problem with it. Something like that. I don't recall  
 [21] her ever telling me how to do that.  
 [22] Q Did she ever discuss Monica with you?  
 [23] A I think that we probably talked about her at some  
 [24] point. I don't recall any specific conversations, but it  
 [25] wouldn't surprise me that we had.

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[1] Q Is this during the period we're talking about where  
 [2] you're perceiving Monica as a problem in the sense that she's  
 [3] hanging around trying to get face time?  
 [4] A It's likely that I would have gone to Nancy to make  
 [5] her aware of that. Or, as I think I probably did, if I had a  
 [6] conversation with Evelyn Lieberman, I probably would have  
 [7] advised Nancy that I'd had that conversation. I mean, I  
 [8] tried to make it a point to keep her up to date on whatever I  
 [9] was doing.  
 [10] Q Do you recall talking to anybody about this  
 [11] incident you've described where Monica lingered around after  
 [12] the radio address and Mrs. Currie ushered her into the Oval  
 [13] Office? Who did you tell about that?  
 [14] A I probably would have had a conversation with Nancy  
 [15] Hemreich about that. I vaguely recall that I did.  
 [16] Q Do you recall what her response was?  
 [17] A No, I don't.  
 [18] Q Based on what you know about her, would this have  
 [19] been something that would have concerned her?  
 [20] A Based on what I know about Nancy Hemreich?  
 [21] Q Nancy Hemreich.  
 [22] A Yes. I mean I would imagine that it would be for  
 [23] the same reasons that I've outlined that it would be a point  
 [24] of concern for me.  
 [25] Q You mentioned that sometimes the President will

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[1] talk to people who have political connections and you  
 [2] speculated that that might have been one of the reasons that  
 [3] he spoke to Monica that day, the day that we're talking about  
 [4] after the radio address.  
 [5] A Yes, but that wasn't just my speculation. I  
 [6] vaguely recall him saying something to me to that effect.  
 [7] Q Okay. Do you recall any other interns who he  
 [8] told you -- that he had similar conversations with,  
 [9] because they were politically connected so he had to talk  
 [10] to them?  
 [11] A I don't recall the names of any of them. I can  
 [12] conjure up images of that happening and see their faces. so  
 [13] I'm fairly confident that it happened, but I can't give you a  
 [14] list of those names.  
 [15] Q Interns specifically?  
 [16] A Yes. Interns specifically.  
 [17] Q Okay. Can you give us a ballpark figure? Five,  
 [18] ten, fifteen, a hundred?  
 [19] A I would definitely put it in the five to ten range,  
 [20] if not more.  
 [21] Q And that's during your --  
 [22] A During my tenure. And that's people that I would  
 [23] know about or that I was familiar with. I mean, you know  
 [24] Nancy may have asked Uncle Jed's nephew to write by without me  
 [25] even knowing about it, so --

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[1] Q Okay. How often did you see Monica in the West  
 [2] Wing on the weekends during the whole time that you were at  
 [3] the White House? Can you recall?  
 [4] A I don't recall specifically ever thinking, Oh,  
 [5] it's the weekend and there's Monica.  
 [6] Q All right. So you really can't recall when you saw  
 [7] her on the weekends as opposed to other times?  
 [8] A I mean I don't remember ever seeing her on the  
 [9] weekend, let alone how many times, if at all.  
 [10] Q How did you speak of Monica when you spoke about  
 [11] her?  
 [12] A Well, I probably didn't have occasion to speak of  
 [13] her much except in this conversation I imagine that I had  
 [14] with Ms. Lieberman, but I would -- I would probably have  
 [15] characterized her as a clutch.  
 [16] Q But you don't remember that for sure?  
 [17] A No. I don't remember using that term in reference  
 [18] to her. I certainly think that her behavior was consistent  
 [19] with the way we've talked about that term.  
 [20] Q Has anybody spoken to you about the President's  
 [21] deposition in the Jones v. Clinton case.  
 [22] A No.  
 [23] MR. WISENBERG: I think that's all I've got  
 [24] Ms. Wirth?  
 [25] MS. WIRTH: I just have a few.

OIC-Starr

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BY MS. WIRTH:  
 Q You testified earlier about the budget shutdown working then? You were not one of the people --  
 A I was deemed **essential**. Unlucky for me. All my other friends were having margaritas at lunch somewhere.  
 Q You told us a **little bit** about when your day began. On the average, how long would your day last at the White House? I know there probably is no precise answer to that, but what was your range of hours?  
 A I think from 8:00 to **8:30** I would often start until some time between 7:00 and 8:00 at night when we did not have any evening events and as late as until we got home, if I accompanied the President to an event off campus at night. In those cases, it would be until **10:00, 11:00** at night.  
 Q On the radio address day that you described, do you have any recollection of whether Monica Lewinsky was alone or with other people like family or friends in terms of attending the address?  
 A I don't remember one way or the other.  
 Q When she was waiting to see the President, she was alone?  
 A It seems like she was alone at that point.  
 Q The hotel event that you described, you have some memory of attending a hotel event in the Capitol Hill area?  
 A Mm-hmm.

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Q Do you remember what that event was, by any chance?  
 A I think it was a DNC saxophone club **reception**.  
 Q And do you remember whether that event took place before or after you had your conversation with Evelyn Lieberman about Monica Lewinsky?  
 A I don't remember that one way or the other.  
 Q Did you notice whether Monica Lewinsky spoke to the President on that occasion?  
 A I don't remember watching them speak. I don't remember one way or the other.  
 Q Was that an event that --  
 A In sorry. I will say that she was on the front row of the rope line, as at this other event, so it would -- I would assume that she spoke as he spoke with every other person who would have been either on the front of the rope line or up to three, four, five, six **people** deep into the crowd.  
 Q Is there any particular reason why you noticed her that day?  
 A Well not knowing temporally how these things occurred it's possible that I had been observing her around prior to this and therefore she stood out to me. But as I recall, she stood out because she was wearing a bright pink jacket, a bright pink dress, and she was right smack dab in the center of the room. And as I often do at off-campus

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events, I will skip ahead of the principals and take a look at the room, what are we walking into, what is the situation, and I just remember going into the room to take a quick look around and that she popped out at me. I don't even know that I knew her name at that point, but I recognized her.  
 Q Do you remember anything about what she was wearing the day of the radio address?  
 A No.  
 Q Okay. Putting aside anything that you've read in the paper or heard from the media, do you know anything at all about Monica Lewinsky getting a job in New York?  
 A I think the only thing I know about that at all is what has been in the media accounts. I don't have any independent knowledge of that at all.  
 Q Anything about her getting a job at the U.N.?  
 A No. Not aside from what I've read in the media accounts.  
 Q Anything about her moving to New York?  
 A Not at all.  
 Q Do you know anything at all, again, aside from anything that you've heard in the media about Monica Lewinsky being asked to sign an affidavit in the Paula Jones case?  
 A No. Not aside from what I've read.  
 Q Do you know anything at all about any contact between Monica Lewinsky and Vernon Jordan?

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A Do I know anything about contact between them?  
 A Mm-hmm  
 A No. Not aside from what I've read in the media accounts.  
 Q Aside from the hotel event and the incident that you've described in the Oval Office, the radio address day do you have any knowledge whatsoever about any time the President was with Monica Lewinsky whether alone or with others? Either of your own knowledge --  
 A Whether alone or with others?  
 Q Mm-hmm. Leaving aside the hotel event and leaving aside the radio address.  
 A Let me just recap to make sure I'm not getting myself in trouble here, but the short answer is I don't think so. There's the radio address, there's the event at the hotel. I've mentioned instances that I can't remember specific times but seeing her at events within the complex where other people were there. And I have learned from seeing this video that she was at the South Lawn event which didn't even register with me at the time.  
 Q Other than those occasions?  
 A I don't recall any other occasions.  
 Q Either of your own personal knowledge or anything anybody else told you?  
 A Of other people telling me things like that?

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Q Yes.  
 A No. I don't recall other people saying anything like that. I mean, more often than not, I would have been with him to witness it firsthand, so, no.  
 MS. WIRTH: All right. That's all I have.  
 MR. BINHAK: As they say, you're on the goal line.  
 Just a couple more questions.  
 THE WITNESS: In the red zone?  
 MR. BINHAK: Right. In the red zone.  
 BY MR. BINHAK:  
 Q Do you keep what's known as the annotated schedule of the President?  
 A Yes, I do.  
 Q Okay. Why don't you just explain to the grand jury what that is.  
 A Much like the Secret Service logs that I referred to that I think are the result of the First Family Locator box, I keep another record called the annotated schedule which is where I take the daily schedule and I write on the schedule what actually happens in terms of this meeting was scheduled to start at 9:30, did it start at 9:30 or did it start at 9:40, 9:20. It says that the chief of staff and the National Security Advisor were going to be here, were they chief of staff and National Security Advisor here. And to the best of my abilities I try to make that an accurate

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reflection of how the President spent that day with regard to the schedule as it was produced.  
 I then turn the annotated schedule over to the diarist who compiles my record along with other records into basically a chronological database of what the President did on a particular day.  
 Q And now you're talking about Ms. McCatherine.  
 A Ellen McCatherine. Yes.  
 Q All right. Now, can you remember any instances where the name Monica Lewinsky would have shown up on the annotated schedule?  
 A I don't remember any instances.  
 Q That's not a name that you remember ever writing down on the annotated schedule?  
 A No. As I've mentioned, I didn't know her last name.  
 Q I take it that you have been following this story in the press, at least to a certain extent.  
 A Mm-hmm.  
 Q So you are familiar, then, with the fact that Ms. Lewinsky at least as it's been reported had an opportunity to discuss getting a new job with Vernon Jordan, that she had an interview with Ambassador Richardson in New York and that she had interviews at several companies in New York City, private companies.

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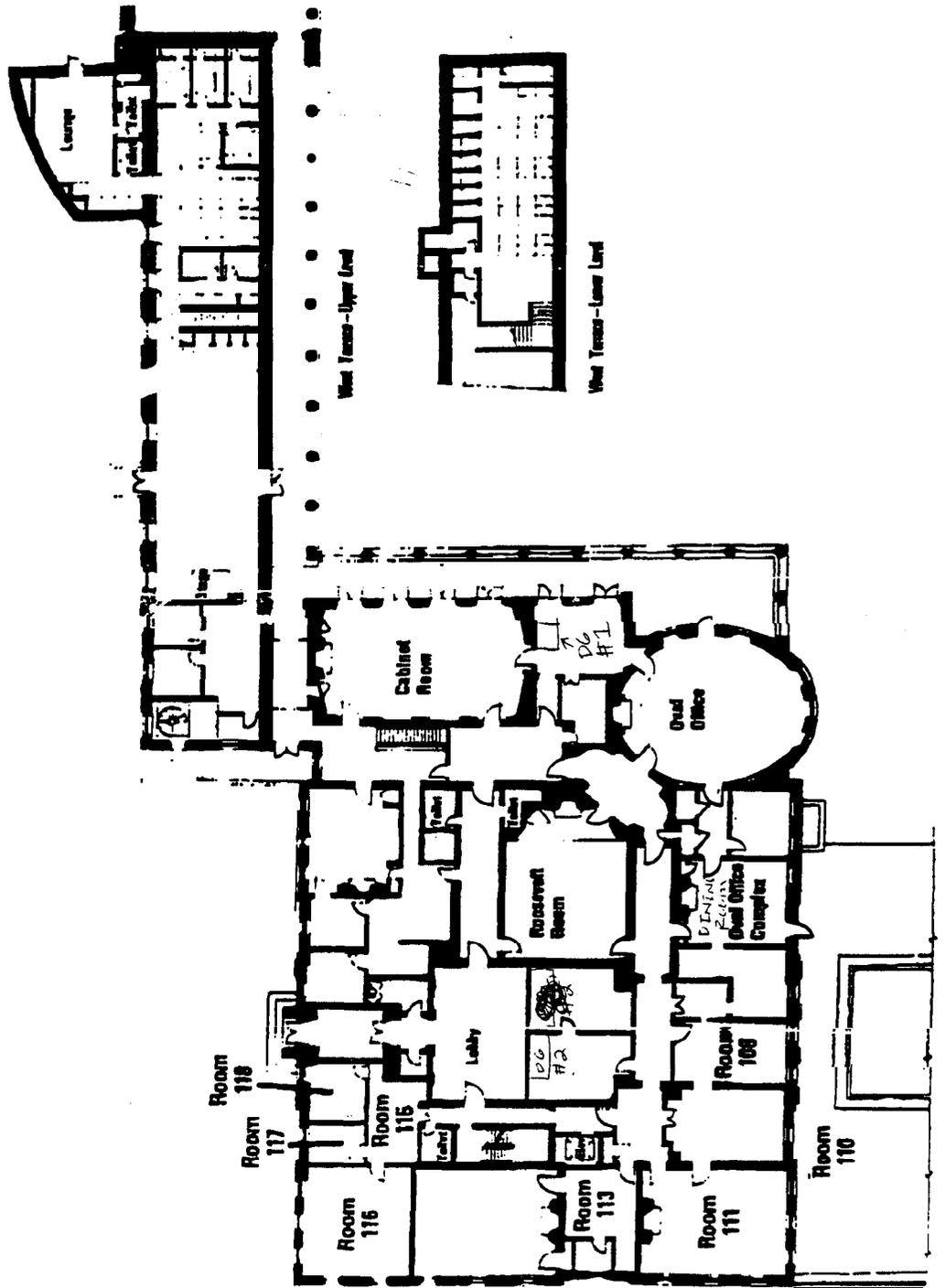
[1] A I have read reports that say that. Yes.  
 [2] Q All right. As a person of roughly the same age as  
 [3] hers and although obviously with a great deal more contact  
 [4] with the President but I think we can assume that you're  
 [5] about the same level in staff, do you regard the treatment  
 [6] that Ms. Lewinsky received as unusual for someone who was  
 [7] leaving the White House and looking for work?  
 [8] A Well, as I've read the reports, she was at that  
 [9] point leaving the Pentagon when she was looking for work.  
 [10] Q Excuse me. I'm sorry. I misspoke.  
 [11] A I don't know. Maybe unusual but certainly not  
 [12] unprecedented.  
 [13] Q Would you expect to have a conversation with  
 [14] someone like Vernon Jordan if you decided to leave now the  
 [15] White House and look for work yourself?  
 [16] A Yes.  
 [17] MR. BINHAK: Okay. Last two questions.  
 [18] MR. WISENBERG: From you.  
 [19] MR. BINHAK: From me.  
 [20] MR. WISENBERG: Let me just -- can I ask one real  
 [21] quick?  
 [22] MR. BINHAK: Sure. Absolutely.  
 [23] BY MR. WISENBERG:  
 [24] Q Would you expect Vernon Jordan to take you in his  
 [25] car to an attorney that he recommended for you?

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[1] A It would not surprise me if he were willing to do  
 [2] that for me.  
 [3] BY MR. BINHAK:  
 [4] Q Is there anything -- let's start this way. You've  
 [5] now sat for about two hours or maybe three discussing the  
 [6] various subjects that we're talking about, so I think you  
 [7] have a good sense of the areas that we've been asking you  
 [8] about.  
 [9] A Yes.  
 [10] Q Is there anything that you can think of that is  
 [11] relevant to the areas that we're asking about that we have  
 [12] not elicited from you through our questioning? Any  
 [13] information?  
 [14] A Well, nothing comes to mind and not having a better  
 [15] understanding of the approach that you all are taking, no.  
 [16] Nothing does come to mind.  
 [17] BY MR. WISENBERG:  
 [18] Q Well, you heard me describe our authority and read  
 [19] a part of the courts order about what we're looking at at  
 [20] the beginning of your session, correct?  
 [21] A Yes. I think you're talking about looking into  
 [22] perjury or suborning perjury.  
 [23] Q Byonica Lewinsky or anybody having to do with  
 [24] Jones v. Clinton. So I guess the question is is there any  
 [25] relevant information that you haven't told us, anything

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[1] relevant to our inquiry?  
 [2] A No, I don't think so.  
 [3] BY MR. BINHAK:  
 [4] Q Is there a question that you could think of that we  
 [5] could ask you that could trigger a memory that you have?  
 [6] A Barring hypnosis no. I don't think there is. In  
 [7] definitely not a prosecutor, so I hope that I don't get held  
 [8] to this, but no.  
 [9] MR. BINHAK: Fair enough. As far as I'm concerned.  
 [10] you've now passed the goal line. If any of my colleagues  
 [11] have any questions --  
 [12] MR. WISENBERG: I don't. Do you?  
 [13] MS. WIRTH: No.  
 [14] MR. BINHAK: Any other questions from grand jury?  
 [15] MR. WISENBERG: Questions from the grand jury?  
 [16] (No response.)  
 [17] MR. WISENBERG: Okay. Thirty seconds to spare.  
 [18] May the witness be excused?  
 [19] THE FOREPERSON: Yes, he may.  
 [20] (The witness was excused.)  
 [21] (Whereupon, at 4:30 p.m., the taking of testimony  
 [22] in the presence of a full quorum of the Grand Jury was  
 [23] concluded.)  
 [24] \* \* \* \* \*  
 [25]



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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 05/11/98

PATRICK JOSEPH GRIFFIN, white, male, date of birth [REDACTED], place of birth [REDACTED], Social Security Account Number [REDACTED], home telephone number [REDACTED], home address [REDACTED], President, GRIFFIN & JOHNSON, 1300 Connecticut Avenue, NW, 6<sup>th</sup> Floor, Washington, DC was apprised of the official identity of the interviewing Agents and the nature of the interview. Also present for the interview was GRIFFIN's attorney, ROBERT F. BAUER with the law firm of PERKINS, COIE, LLP, Washington, DC. GRIFFIN provided the following information:

GRIFFIN began working in the White House in January of 1994 as the Assistant to the President and Director of Legislative Affairs. GRIFFIN worked in that position until February of 1996, when he left the White House to return to private industry.

GRIFFIN first met MONICA LEWINSKY in November of 1995 during the Government shutdown. LEWINSKY spent time in the office outside of LEON PANETTA's office answering telephones during the shutdown.

GRIFFIN described LEWINSKY as a little too eager and effervescent. GRIFFIN advised that LEWINSKY's attire and demeanor indicated she was not aware of where she worked. GRIFFIN advised that LEWINSKY's dresses were too short and her blouses were too tight. LEWINSKY went out of her way to get noticed.

GRIFFIN recalls one occasion during the shutdown when LEWINSKY met the President. GRIFFIN described LEWINSKY as being flirtatious. In response, the President was friendly.

GRIFFIN advised he played no role in LEWINSKY receiving a paid position in the Office of Legislative Affairs. GRIFFIN advised that TIM KEATING, GRIFFIN's Chief of Staff, was responsible for hiring LEWINSKY. GRIFFIN is not aware of how KEATING came to know LEWINSKY. GRIFFIN may have signed the form which approved LEWINSKY getting the paid position, but GRIFFIN did so at the recommendation of KEATING.

Investigation on 05/07/98 Washington, DC File # 29D-OIC-LR-35063  
 by [REDACTED]

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Continuation of OIC-302 of PATRICK JOSEPH GRIFFIN . On 05/07/98 . Page 2

**GRIFFIN** stated he had no supervisory duties over LEWINSKY. **GRIFFIN** advised that he had a one on one meeting with LEWINSKY when she worked in the Office of Legislative Affairs. **GRIFFIN** felt sorry for LEWINSKY as she was overweight and self-conscious about it. **GRIFFIN** told LEWINSKY to "chill," that she did not have to make it a point to get noticed. **GRIFFIN** recalls LEWINSKY nodding when he said this.

**GRIFFIN** did not hear any stories about LEWINSKY and the President having a relationship. **GRIFFIN** has some recollection as to why LEWINSKY was transferred to the Pentagon. **KEATING** advised **GRIFFIN** that **JOCELYN JOLLEY**, **LEWINSKY's** supervisor in the Correspondence Unit of the Office of Legislative Affairs, was not doing a very good job. **KEATING** told **GRIFFIN** that **LEWINSKY's** performance was not helping the overall operation of the office.

**GRIFFIN** recalls seeing LEWINSKY at a going away party for **STEVE GOODIN** held near **BETTY CURRIE's** office, just outside the Oval Office. **GRIFFIN** recalls seeing the President there, but does not recall seeing LEWINSKY and the President together. **GRIFFIN** thought **GEORGE STEPHANOPOLOUS** was one of approximately sixty people at that party.

**GRIFFIN** recalls a going away party thrown for him in the White House. The President, Vice President and LEWINSKY were there among the fifty or so people in attendance. **GRIFFIN** recalls a photograph being taken of the President with the junior staff of the Office of Legislative Affairs, including LEWINSKY.

**GRIFFIN** advised he remains in contact with many current and former White House employees. **GRIFFIN** advised he has limited his conversations about the LEWINSKY matter to the political impact the situation is having. **GRIFFIN** has not discussed with anyone the details of any of the stories related to LEWINSKY that have appeared in the press in the past four months. **GRIFFIN** has not asked if any of the stories are true, and no one has volunteered such information.

**GRIFFIN** advised that the practice in government was to transfer **people** who would probably be terminated in private industry.

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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/29/98

On 1/29/98, a federal Grand Jury subpoena was served on **DAVID GROBAINE, owner** of Briarwood Bookstore, Maryland Avenue, Annapolis, Maryland. Service of the subpoena was effected at his place of business. The subpoena specified his appearance before the Grand Jury on February 3, 1998 as well the production of documents relating to the sale of a book as specified in the subpoena.

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Investigation on 1/29/98 at Annapolis, Maryland File # 29D-OIC-LR-35063  
by [REDACTED] Date dictated 1/29/98

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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/29/98

DAVID GROBAINE, owner of Briarwood Bookstore, Maryland Avenue, Annapolis, Maryland, was interviewed at this place business at which time he provided the following information:

During March or April of 1997, the President of the United States along with an entourage, which included among others, Governor Parris Glendening, visited his bookshop. At that time, he recalled that President Clinton looked around the shop and looked at some of the books that were for sale. At one point, the President read aloud some poetry from one of the books. The President was interested in one of the other books, however, GROBAINE could not presently recall the exact item. GROBAINE stated that the President did not at any time read any limericks. He is sure of that fact because the book which he was reading was written in the mid-19th century and the limerick was not invented until around the turn of the 20th century.

At some point after the visit, GROBAINE received a telephone call at his shop from an unknown female who advised she wanted to purchase a book. She advised that her father or uncle (GROBAINE could not recall which) worked with the President and that she and her relative wanted to give the book to the President as a present. GROBAINE described the woman as adamant that she find the book the President liked and obtain it.

During the call GROBAINE advised the woman the book recalled as the one of interest. She said she was located in Washington, DC and that she was going to come to Annapolis to make the purchase. GROBAINE recalled that she was unable to arrive at the shop prior to the 6:00 PM closing time. As an accommodation, he provided her with a telephone number where he could be reached that evening. GROBAINE said that he played the mandolin and banjo and was scheduled to practice with his musical group that night.

The woman did, in fact, call him from what he believed was a cellular telephone, said she was ten minutes away, and that she wanted to meet him. GROBAINE met her at his store whereupon she purchased the book. GROBAINE recalled that she paid either by check or credit card. He further stated that would have a record of the credit payment. If she paid by bank check, he ~~would be able to retrieve record of the sale by looking at his~~

Investigation on 1/29/98 at Annapolis, Maryland File # 29D-OIC-LR-35063

by [REDACTED] Date dictated 1/29/98

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Continuation of OIC-302 of DAVID GROBAINÉ , On 1/29/98 , Page 2

bank deposit slips which note the amount of each check along with the last name of the customer.

**GROBAINÉ** does not recall the name of the customer. **He** was displayed a newspaper photo of **MONICA LEWINSKY** at which time he stated it was possible that it was the same person, but he was not sure. **He** said that he has not been reading any newspapers or watching much television, so he was not familiar with the individual or the situation in general.

**He** described the woman as an attractive person about 5 feet 4 or 5 inches tall.

**GROBAINÉ** further stated that he would inquire with his music group associate as to the name of the woman customer in that he discussed the matter with him.

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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 3/6/98

DAVID GROBANIE, owner of the BRIARWOOD BOOKSHOP, Maryland Avenue, Annapolis, Maryland, telephone number [REDACTED], was interviewed, at which time he provided the following information:

A book entitled The Presidents of the United States, published by D. APPLETON AND COMPANY in 1898, bearing Office of Independent Counsel Bate stamp number **V002-DC-00000471**, was displayed to GROBANIE. He examined the book and stated with certainty the book was never in his store and specifically that he did not sell the book to anyone, including President CLINTON on the occasion of his visit to BRIARWOOD BOOKSHOP, or the woman customer who told him she was purchasing a book for the President of the United States.

GROBANIE said he has purchased every book which has been for sale in his store and the book described above has never been in his inventory.

GROBANIE also examined the first page of the book and noted a faint pencil marking which indicated a price of \$45.00. The price marking was located about one inch from the top of the page and about one and one half inches from the right side of the page. GROBANIE said he always, without fail, places the price of a book in pencil in the uppermost portion of the right corner of the first page leaving virtually no margin between the marking and the corner of the page. He displayed several examples of his technique on books currently for sale in the store.

Regarding the woman with whom he made arrangements to meet at his shop after normal business hours to purchase a book for the President, GROBANIE stated that he has recalled that the woman purchased a book entitled History of Peter the Great, 1814 edition. The price of the book was \$200.00, however, GROBANIE recalled that he thinks he charged her \$150.00.

Within a few weeks of the President's visit to his shop, GROBANIE received a series of four telephone calls from an unknown woman over a period of two weeks. During the first call,

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Investigation on 3/5-6/98 at Annapolis, Maryland File # 29D-OIC-LR-35063

by [REDACTED] Date dictated 3/6/98

29D-OIC-LR-35063

Continuation of OIC-302 of DAVID GROBANIE , On 3/6/98 , Page 2

she asked GROBANIE if he had any suggestions for a book to be given as a present for President CLINTON. She next called and asked him about the hours of operation of the store. During the third call, she made arrangements with GROBANIE to meet him at his store after normal business hours, in view of the fact that she was traveling from Washington, DC, or Virginia, and was unable to arrive at the Annapolis location before the shop's 6:00 p.m. closing time. The fourth, and last, telephone call GROBANIE received was on the evening of their appointment. She called from what he believed was a cellular telephone, advising him that she had arrived in Annapolis and would be at the store in about ten minutes.

During their meeting at the store, she made several comments to GROBANIE about President CLINTON, from which he inferred that she was quite enamored of CLINTON. Referring to CLINTON's visit to the store, she said, "wasn't it just wonderful meeting him? I think he's a wonderful man." GROBANIE recalled thinking at the time that she was interested in either getting a job or pursuing a career in politics.

GROBANIE could not recall the method of payment used for the purchase of the book, saying that it could have been by credit card, check, or cash. GROBANIE has examined his credit card sale records for calendar year 1997, and could not find any record of a sale in the name of MONICA LEWINSKY. He has also checked his bank deposit slips reflecting records of purchases made by check, with negative results. He displayed his bank deposit slip forms indicating where he writes the last name of the person writing the check. GROBANIE also reviewed sales by credit card in 1997, in the name of MARCIA LEWIS; however, he was unable to locate any such record.

During his record search of purchases (other than cash), he located only one sale which fit the criteria of the correct price, time frame, and female purchaser. This was a sale on March 27, 1997, to a **BETTIE DEEN** for \$157.50 (\$150.00 purchase price and \$7.50 state sales tax). He could not recall the name of the book bought by DEEN. GROBANIE said that the name **BETTIE DEEN** did not seem to fit with his recollection of the name the woman in question provided to him at the time.

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Continuation of OIC-302 of DAVID GROBANIE . On 3/6/98 . Page 3

GROBANIE has seen several pictures of MONICA LEWINSKY and said that although he was not sure, the woman customer could have been her. He recalls she may have been about 5' 4" or 5' 5" tall with long brown hair. He described her as pretty.

